



2024

SUSTAINABILITY REPORT

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List of Acronyms

ACA	Additional Conservation Action	CR	Critically Endangered Species
AEMS	Ambatovy Environmental Management System	CRC	Convention on the Rights of the Child
AfDB	African Development Bank	CRGRC	<i>Comité Régional de Gestion des Risques et des Catastrophes</i> (Regional Committee for Disaster Risk Management)
AFNOR	<i>Association Française de Normalisation</i> (French Standardization Association)	CSR	Communities and Social Relations
AIFR	All Injury Frequency Rate	CTD	<i>Collectivités Territoriales Décentralisées</i> (Decentralized Territorial Collectivities)
AIMS	Ambatovy Incident Management System	CTE	<i>Comité Technique d'Évaluation</i> (Technical Evaluation Committee)
ALBI	Ambatovy Local Business Initiative	DGDD	<i>Direction Générale du Développement Durable</i> (General Directorate of Sustainable Development)
AMSA	Ambatovy Minerals S.A.	DMSA	Dynatec Madagascar S.A.
APELL	Awareness and Prevention of Emergencies at the Local Level	DRAE	<i>Direction Régionale de l'Agriculture et de l'Élevage</i> (Regional Directorate of Agriculture and Livestock)
B2B	Business-to-Business	DREDD	<i>Direction Régionale de l'Environnement et du Développement Durable</i> (Regional Directorate of Environment and Sustainable Development)
BBOP	Business and Biodiversity Offsets Program	DREN	<i>Direction Régionale de l'Éducation Nationale</i> (Regional Directorate of National Education)
BNGRC	<i>Bureau National de Gestion des Risques et des Catastrophes</i> (National Office of Disaster Risk Management)	DRETFP	<i>Direction Régionale de l'Enseignement Technique et de la Formation Professionnelle</i> (Regional Directorate of Technical Education and Vocational Training)
CAHRA	Conflict-Affected and High-Risk Area	DRPEB	<i>Direction Régionale de la Pêche et de l'Économie Bleue</i> (Regional Directorate of Fisheries and the Blue Economy)
CAZ	<i>Couloir Ankeniheny-Zahamena</i> (Ankeniheny-Zahamena Corridor)	DRSP	<i>Direction Régionale de la Santé Publique</i> (Regional Directorate of Public Health)
CCDR	Country Climate and Development Report	EDBM	Economic Development Board of Madagascar
CCS	<i>Centre Culturel et Social</i> (Cultural and Social Center)	EGOC	External Grievance Oversight Committee
CDP	Communal Development Plan	EITI	Extractive Industries Transparency Initiative
CEO	Chief Executive Officer	EN	Endangered Species
CFAM	<i>Corridor Forestier Analamay Mantadia</i> (Analamay-Mantadia Forest Corridor)	EPFI	Equator Principles Financial Institution
CHRD	<i>Centre Hospitalier de Référence de District</i> (District Reference Hospital Center)	ERP	Emergency Response Plan
CHU	<i>Centre Hospitalier Universitaire</i> (University Hospital Center)	ERT	Emergency Response Team
CI	Cobalt Institute	ESG	Environmental, Social and Governance
CIREDD	<i>Circonscription de l'Environnement et du Développement Durable</i> (District for Environment and Sustainable Development)	ESIA	Environmental and Social Impact Assessment
CLP	Classification, Labeling and Packaging	ESU	Evolutionary Significant Unit
CNLS	<i>Comité National pour la Lutte contre le Sida</i> (National Committee for the Fight against AIDS)		
COBA	Community-based Association		
CPN	Child Protection Network		

FAI	First Aid Injury	KOMIR	Korea Mine Rehabilitation and Mineral Resources Corporation
FAT	Fatality	KPI	Key Performance Indicator
FIMIAM	<i>Fikambanambe Mivondrona Ampitambe Mahatsara</i> (Federation of Formal Entities of Ampitambe)	kt	Kiloton
FOS	Foundations of Supervision	LGIM	<i>Loi sur les Grands Investissements Miniers</i> (Law on Large Scale Mining Investments)
FTE	Full-Time Equivalent	LME	London Metal Exchange
GEM	<i>Groupement des Entreprises de Madagascar</i> (Madagascar Business Association)	LPG	Liquid Petroleum Gas
GERP	<i>Groupe d'Etude et de Recherche sur les Primates</i> (Primate Study and Research Group)	LTI	Lost Time Injury
GHG	Greenhouse Gas	LTIFR	Lost Time Injury Frequency Rate
GISTM	Global Industry Standard on Tailings Management	LWA	Local Watch Association
GRI	Global Reporting Initiative	MBG	Missouri Botanical Garden
Ha	Hectare(s)	MECIE	<i>Mise en Compatibilité des Investissements avec l'Environnement</i> (Rendering Investments Compatible with the Environment)
HIA	Health Impact Assessment	MFG	Madagascar Fauna and Flora Group
HIV / AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome	Min	Minimize
HOP	Human and Organizational Performance	MTI	Medical Treatment Injury
HR	Human Resources	NGO	Non-Governmental Organization
HS	Health and Safety	NI	Nickel Institute
HSEQ	Health, Safety, Environment and Quality	NNL	No Net Loss
ICMM	International Council on Mining and Metals	OCHA	Office for the Coordination of Humanitarian Affairs
IFC	International Finance Corporation	OECD	Organization for Economic Cooperation and Development
IGA	Income Generating Activity	ONE	<i>Office National pour l'Environnement</i> (National Office for the Environment)
ILCAD	International Level Crossing Awareness Day	OPP	Ore Preparation Plant
ILO	International Labor Organization	ORN	<i>Office Régional de Nutrition</i> (Regional Office of Nutrition)
INGO	International Non-Governmental Organization	ORTALMA	<i>Office Régional de Tourisme d'Alaotra Mangoro</i> (Regional Tourism Office of Alaotra Mangoro)
IPCC	Intergovernmental Panel on Climate Change	OSCIE	<i>Organisation de la Société Civile sur les Industries Extractives</i> (Civil Society Organization on Extractive Industries)
IRM	International Raw Materials	PAL	Pressure Acid Leach
ISO	International Organization for Standardization	PAP	People Affected by the Project
IT	Information Technology	PAPRIZ	<i>Projet d'Appui pour l'Amélioration de la Productivité et de l'Industrialisation du Secteur Riz</i> (Support Project for the Improvement of Productivity and Industrialization of the Rice Sector)
IUCN	International Union for Conservation of Nature		
JICA	Japan International Cooperation Agency		
kg	Kilogram		
km	Kilometer		

PGEDS	<i>Plan de Gestion Environnementale et de Développement Social</i> (Environmental and Social Development Management Plan)	SIM	<i>Syndicat des Industries de Madagascar</i> (Madagascar Industries Union)
PGES	<i>Plan de Gestion Environnementale Spécifique</i> (Specific Environmental Management Plan)	SME	Small and Medium-sized Enterprise
PI	Predicted Impact	SMIMO	<i>Service Médical Inter-entreprise de Moramanga</i> (Inter-enterprise Medical Service of Moramanga)
PPE	Personal Protective Equipment	SMTTP	<i>Société Malgache de Transformation de Plastiques</i> (Malagasy Plastics Processing Company)
PPI	<i>Plan Particulier d'Intervention</i> (Particular Plan of Intervention)	SOC	Species of Concern
PRI	Principles for Responsible Investment	SOP	Standard Operating Procedure
PSHP	Private Sector Humanitarian Platform	SRA	System of Improved Rice Cultivation
QAQC	Quality Assurance Quality Control	SRI	System of Rice Intensification
QMM	QIT Madagascar Minerals	STI	Sexually Transmitted Infection
QMS	Quality Management System	TMF	Tailings Management Facility
REACH	Registration, Evaluation, Authorization and Restriction of Chemical Substances	ToT	Training of Trainers
RMAP	Responsible Minerals Assurance Process	TPSD	Total Plant Shutdown
RMI	Responsible Minerals Initiative	TRIFR	Total Recordable Injury Frequency Rate
RoW	Right of Way	UDHR	Universal Declaration of Human Rights
Rs	Restore	UN	United Nations
RSE-IDD	<i>Responsabilité Sociétale de l'Entreprise et des Initiatives pour le Développement Durable</i> (Corporate Social Responsibility and Initiatives for Sustainable Development)	UNAIDS	Joint United Nations Programme on HIV and AIDS
RWI	Restricted Work Injury	UNDP	United Nations Development Programme
SCC	Scientific Consultative Committee	UNEP	United Nations Environment Programme
SCM	Supply Chain Management	UNICEF	United Nations Children's Fund
SDGs	Sustainable Development Goals	USAID	United States Agency for International Development
SDS	Safety Data Sheet	VPSHR	Voluntary Principles on Security and Human Rights
SICE	Social Investment and Community Engagement	VSLA	Village Savings and Loan Association
SIF	Social Investment Fund	WASH	Water, Sanitation and Hygiene
		WHO	World Health Organization
		WUA	Water Users Association





Message from our President



Trevor Naidoo,
Acting President

“Working hand-in-hand with Madagascar’s local communities, we continue operating as a responsible mining company that demonstrates how industry can be a force for positive change in one of the world’s most biodiverse nations.”

Dear Readers,

We are pleased to present Ambatovy’s 2024 Sustainability Report – our 15th annual publication.

This report reflects the dedication and hard work of our entire team throughout the year, demonstrating Ambatovy’s ongoing commitment to sustainable mining practices and its positive impact on Madagascar’s communities and environment.

The achievements documented here build on a strong foundation established over many years, supported by the expertise and dedication of our workforce. Ambatovy continues to commit to industry standards for responsible resource extraction through an integrated approach to sustainability – encompassing environmental stewardship, community development, and economic growth – that aligns with Madagascar’s development goals and the expectations of our stakeholders.

In 2024, we faced both opportunities and challenges. Our teams responded with resilience and innovation, maintaining a strong focus on operational efficiency, cost management, and production reliability. From biodiversity conservation initiatives to community partnership programs, every aspect of our work reflects our commitment to leaving a positive legacy for future generations.

We extend our sincere appreciation to our employees, partners, host communities, and all those who support our mission. As we look ahead, Ambatovy remains dedicated building on this strong foundation and shaping a sustainable future together.

This report not only showcases our 2024 achievements but also reaffirms our commitment to operate responsibly and contribute meaningfully to Madagascar’s sustainable development.

We invite you to explore the detailed information contained in this report and welcome your feedback as we continue our sustainability journey.

Misaotra betsaka!

About This Report

Report Profile

For the 15th consecutive year, Ambatovy is proud to present its annual Sustainability Report. This document, prepared in reference to the Global Reporting Initiative (GRI) Standards, covers the performance period from January 1st to December 31st, 2024. It follows the release of our 14th annual Sustainability Report, which detailed our 2023 performance and was published in the first quarter of 2024.

The 2024 Sustainability Report highlights Ambatovy's achievements, challenges, and sustainability performance in key areas of interest to stakeholders. To ensure the report's relevance, accuracy, and completeness, it undergoes a robust internal review and approval process. Each section is carefully examined and validated by the relevant members of Senior Management. While this report has not been externally assured, Ambatovy submits annual sustainability performance

updates to Malagasy authorities and the National Office for the Environment (ONE), the national regulator. Additionally, our field activities are regularly monitored and reviewed by the ONE and Independent Engineers appointed by our lenders. To further enhance transparency, the Scientific Consultative Committee (SCC), composed of respected national and international scientists, conducts biennial reviews of our environmental and social programs, offering impartial advice and insights.

No significant changes have been made to the list of material topics compared to the previous reporting period. Likewise, there have been no substantial alterations in the size, scope, boundary, or measurements that would affect the comparability of this report with previous reports or require a restatement of key disclosures. Any variations in previously reported data have been clearly explained and disclosed within the report.

Reporting Boundary, Materiality and Scope

Unless otherwise noted, this report discloses material information for the calendar year 2024 (January 1st – December 31st). It addresses a wide range of economic, social, environmental, and governance topics that Ambatovy considers materially significant, following the GRI guidance on materiality and completeness. According to the GRI guidance, sustainability reports should focus on topics and indicators that reflect a company's most significant impacts on the economy, environment, and people. This includes human rights and any issues that could substantively influence stakeholder assessments and decisions.

This report encompasses Ambatovy's operations, all of which are fully based in Madagascar, and includes departments and initiatives directly under our control. As a private joint venture entity, Ambatovy does not have subsidiaries, leased facilities, joint ventures, suppliers, or other bodies under its jurisdiction. The report draws on internal data sources; however, external data is included when relevant or necessary. Its scope reflects not only GRI Standards but also the expectations of our stakeholders, ensuring coverage of topics that are both material to stakeholders and essential to our business. For continuity, statements from previous years' reports may be included to provide context and background information for new readers or those less familiar with our operations.

Two key considerations guided our decisions on the content and organization of this report:

- **Organizational Commitments:** Ambatovy's obligations to the Malagasy Government, the national regulator, and international standards – such as the International Finance Corporation (IFC) Performance Standards – were pivotal in determining which GRI disclosures to include.
- **Materiality for Stakeholders:** Ambatovy prioritizes GRI disclosures that are relevant, important, and meaningful to both internal and external stakeholders. Additionally, the report also includes supplementary information not required by GRI guidelines but deemed important in light of our mandatory and voluntary commitments to national and international regulatory bodies, associations, and programs. This approach ensures that the report delivers essential insights on our structure, strategy and performance while addressing the sustainability challenges specific to our industry. Our senior management actively participates in this process. For a complete list of material topics, please refer to the GRI Content Index in the appendices.

We intend this report to be used as a reference for a diverse range of stakeholders, including government authorities, local communities, civil society groups, employees, international organizations, partner companies, financial institutions, suppliers, customers, and members of the business and media communities. For more detailed information on our stakeholder identification process and engagement activities, please refer to the Stakeholder Engagement section of this report.

We welcome comments and questions related to this report. Please contact us at media@ambatovy.mg for further information. Please note, all monetary values in the report are in US Dollars unless otherwise noted.

About Us

Ambatovy is a large-scale nickel and cobalt mining operation in Madagascar, consisting of a laterite mine near Moramanga and a processing plant and refinery in Toamasina. The two sites are connected by a pipeline approximately 220 km long. An auxiliary office in Antananarivo provides administrative, legal, and communications support to both locations and acts as a liaison with government offices and international organizations as well as the media and business sectors.

Our Vision

To be recognized as the world's most successful and sustainable producer of high-quality nickel and cobalt.

Our Mission

To deliver high quality nickel and cobalt to the market, operating at high standards of corporate and social responsibility, with utmost regard for the health and safety of our employees and contractors, the preservation of the surrounding environment, and the creation of long-lasting benefits for the communities in the areas where we operate.

Our Values

Respect

- We treat others with dignity and respect, regardless of the situation.

Integrity

- We are true to our word and are ethical in all that we do.

Responsibility

- We take responsibility for our choices, our words, and our actions.

Excellence

- We never stop seeking to improve our business.

Number of Employees (31-12-2024)

3,674 direct employees
89% Malagasy



Environment and Biodiversity

2,162 hectares mine footprint
(mine area + buffer zone)
14,000 hectares of forest offsets



2024 Production

27,690 tons nickel
2,535 tons cobalt
80,200 tons ammonium sulfate



Operational lifespan of the Mine

Until approximately 2052,
including reclamation
and mine closure



Locations

Ambatovy is located in central
and eastern Madagascar



Our Operations and Facilities



Mine Site

Our Mine Site is located near the town of Moramanga, in the Alaotra Mangoro Region, about 80 km east of Madagascar's capital. The ore body at the Mine consists of two lateritic nickel deposits: the Ambatovy and Analamay deposits, with a total footprint of 2,162 ha, including our actual mine area of 1,616 ha and a buffer zone. Ore is surface-mined and turned into slurry for transportation to the Plant Site via a pipeline.



Plant Site

Our Plant Site is located approximately ten kilometers south of the Port of Toamasina, in the Atsinanana Region. It is an industrial complex covering more than 320 hectares. The facility was designed and built to operate in accordance with Malagasy regulations and the IFC Performance Standards. The site's main components include a pressure acid leaching area (PAL), a refinery, and a utilities area to support the process. The site also includes a medical clinic, a training center, several canteens, warehouses, workshops, a laboratory, offices, and living quarters.



Tailings Management Facility

Ambatovy's Tailings Management Facility (TMF) is located nine kilometers west of the Plant Site and will be constructed over the life of the project in three phases, with the perimeter dams continuously raised to meet tailings containment needs. Tailings – the residue with no commercial value left over after mining, processing, and refining – are neutralized and pumped from the Plant Site through a 15 km pipeline to the Tailings Site, a secure, stabilized area where the treated residue is deposited for permanent safekeeping. Excess water from the tailings is discharged into the ocean through a diffuser system designed to minimize localized impacts. A portion of this water is available to be reused at the Plant Site. Once the Tailings Site is filled, it will be reclaimed and drainage systems will be re-established. Ambatovy's TMF was built to specifications consistent with IFC requirements, and the site was chosen for its relatively low environmental sensitivity.



Pipeline

Ambatovy's Pipeline, approximately 220 km in length, runs from the Mine to the Plant Site in Toamasina. The route selected for the Pipeline makes significant deviations to avoid sensitive environmental areas, cultural sites, and local populations. The Pipeline is buried for the majority of its route, thereby avoiding critical wildlife habitats and residual forest fragments. Deep-rooting vegetation has been planted along the Pipeline to stabilize steep slopes, prevent erosion, and assist in rehabilitation.

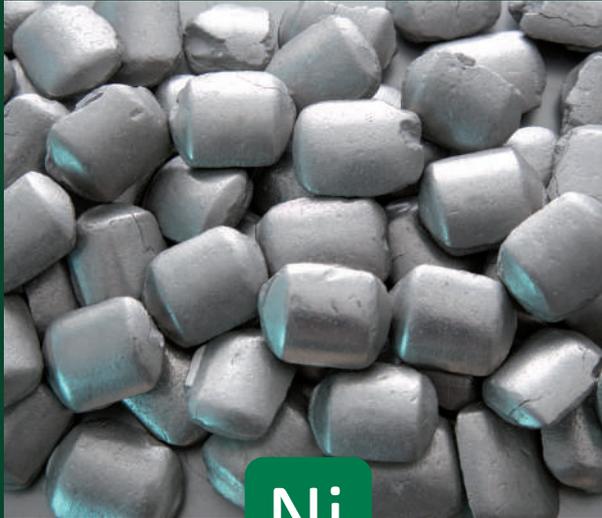


Support Facilities

Ambatovy also operates several support facilities near the Plant Site, including the port, railway, road, ammonia storage tanks and the marine outfall. During the construction phase, Ambatovy installed a substantial extension of Pier B at the Port of Toamasina, which includes a new fuel terminal, as well as equipment for handling the importation of bulk raw materials such as limestone, coal, sulphur and ammonia. We also installed a 12 km railway and financed the upgrade of an 11 km road linking the port to the Plant Site. Ambatovy imports ammonia and stores it, first at a large storage tank located four km north of the Plant Site, and then at the Plant Site's ammonia storage tanks. The marine outfall is a pipeline that extends 1.5 km offshore within a rock-filled breakwater structure. Installed in 2011, it is used to dispose of excess reclaimed water from the TMF.

Our Products

Ambatovy uses a hydrometallurgical process to produce finished nickel, cobalt, and ammonium sulphate. We supply a global portfolio of industrial customers located primarily in Asia, Europe, and the United States. Our nickel and cobalt products are mainly used as inputs for the production of stainless steel, chemicals for battery manufacture, and specialty high-performance alloys for turbine components in both aerospace and land-based power generation equipment. They are also consumed in the production of a wide range of other specialty industrial products. Both our nickel and cobalt are registered brands on the London Metal Exchange (LME).



Ni

The majority of nickel produced worldwide goes into manufacturing stainless steel. Nickel is also frequently combined with other metals to create superalloys. It is found throughout modern life, from jewellery and silverware to rechargeable batteries for hybrid and electric vehicles, cell phones, portable electronics, and jet turbines as well as other high-performance applications. Ambatovy produces Class I nickel briquettes of 99.9% purity for the world market. In 2024, we produced **27,690 tons of nickel**.



Co

Cobalt has been used for centuries to add vivid blues to glass, glazes, and pottery. In modern times, it is used in hundreds of chemical, metallurgical, and industrial products and is an indispensable component of rechargeable batteries found in devices such as cell phones, tablets, power tools, and other portable devices, as well as hybrid and electric vehicles and other technologies. Ambatovy produces cobalt that is of 99.9% purity. It is sold in briquette and in powdered form. In 2024, we produced **2,535 tons of cobalt**.



$(\text{NH}_4)_2\text{SO}_4$

As a by-product of the hydrometallurgical process, Ambatovy also produces ammonium sulphate, an inorganic, highly water-soluble salt. The primary use of ammonium sulphate is as a fertilizer for soils, as part of a comprehensive agronomic improvement plan. Ambatovy's ammonium sulphate is produced in crystallized granules and is sold mainly on the international market, with a portion distributed locally. In 2024, we produced **80,200 tons of ammonium sulphate**.

2024 Highlights



0.056 Total Recordable Injury Frequency Rate (TRIFR)

0.18 All Injury Frequency Rate (AIFR)



172,936

meals served across 18 primary schools in Atsinanana and Alaotra Mangoro regions



23.86 ha restored with native plant species

7,959 orchids growing in Ambatovy shade houses



Over **US \$400,000** invested in community donations



252,226

training work-hours completed



US \$263.3M

spent on local purchasing



13%

Female Workforce Representation



232

students enrolled in Ambatovy's scholarship program



291 interns

enrolled in the Ambatovy internship program



3,674 direct employees

89% nationals



72.8%

of waste recycled



Certified:

ISO 9001 / ISO 14001 / ISO 45001

Corporate Governance

Ambatovy is a joint-venture enterprise held by two shareholders: Sumitomo Corporation (54.18%) and Korea Mine Rehabilitation and Mineral Resources Corporation known as KOMIR (45.82%). Both partners are fully committed to transparent, sustainable and responsible business practices. Indeed, central to Ambatovy's record as a trusted operator is our commitment to ethical business practices and high standards of corporate governance. We recognize the importance of having an integrated approach to managing our operations, risks and relationships.

Ambatovy is comprised of two companies: Ambatovy Minerals S.A. (AMSA) and Dynatec Madagascar S.A. (DMSA), which, together, are responsible for day-to-day operations. AMSA is the holder of the mining title and operates the Mine Site, and DMSA manages the Plant Site and all the activities related to it. Both AMSA and DMSA are subject to the laws of Madagascar, and each has a Board of Directors, chaired by Ambatovy's President, that are responsible for setting the overall strategy of the company. In practice, AMSA and DMSA act in parallel under the purview of Ambatovy's Executive Committee, which consists of members from each of the two partner companies.

The Executive Committee is responsible for upholding and adhering to our Integrity Guide and Code of Conduct. Guided by these policies, they provide direction and guidance to our business; support our directors and employees; approve strategies, policies and procedures; and promote a culture of integrity, honesty and accountability that upholds Ambatovy's core values.

At the end of 2024, the Executive Committee was comprised of eight voting members who are responsible for overseeing the direction and execution of Ambatovy's activities and for ensuring proper due diligence.

Ambatovy also has a Senior Management team comprised of eight persons (as of December 2024) selected for their diverse competencies, professional expertise, and perspectives that enhance our business operations. Each member brings extensive knowledge and experience to their role. To ensure alignment with Ambatovy's values and standards, all members undergo an annual evaluation to assess and reinforce their contributions.

The Executive Committee meets at least quarterly or as circumstances require and receives regular updates from the Senior Management team and from external advisors on matters including corporate governance, business ethics and sustainability. Members of the Executive Committee and of the Senior Management team participate in a variety of relevant conferences, seminars and workshops to keep abreast of

developments in sustainability, responsible mining and ESG, and to share best practices.

In addition to the Executive Committee, there are three sub-committees whose members are also employees of each of our partners:

- Audit
- Environment, Health and Safety, Sustainability
- Marketing

The Audit sub-committee plays a pivotal role in maintaining Ambatovy's financial integrity and transparency across its operations. Its key responsibilities include overseeing financial reporting processes, ensuring compliance with regulatory requirements, and monitoring internal controls. The sub-committee also reviews audit findings and provides recommendations to strengthen Ambatovy's financial governance.

The Environment, Health and Safety, Sustainability sub-committee is charged with monitoring and guiding Ambatovy's policies, practices, programs, and disclosures in areas such as environmental management, tailings management, sustainable development, climate change, health and safety, social performance, community relations, human rights, and security. This sub-committee ensures that Ambatovy consistently promotes ethical, transparent, and responsible behavior while meaningfully engaging stakeholders and communities.

The Marketing sub-committee focuses on optimizing the commercial aspects of Ambatovy's operations. It oversees product sales strategies, market analyses, customer engagement, and branding efforts to enhance Ambatovy's market position and ensure alignment with global and local market demands.



Our Sustainability Commitment

Ambatovy believes that our long-term sustainability is directly linked to the quality of our relationships with our stakeholders, along with our resilience to external and internal crises and our ability to weather negative cycles within the mining industry.

In the conduct of our business, we are committed to engaging with our stakeholders and earning their support by operating ethically, creating a rewarding workplace, demonstrating environmental excellence and submitting to external controls.

To meet this commitment Ambatovy will:

- **Effectively engage stakeholders** in order to understand their expectations and concerns, to build trust, to foster employee pride and community ownership, to maximize socio-economic benefits to the community and country, and to strengthen our social license to operate;
- **Demonstrate strong governance** ensuring that our internal governance and compliance is flawless, that the country and our neighboring communities receive their fair share of benefits from Ambatovy, and that we operate ethically within our zero tolerance policy and with uncompromising respect for human rights as defined by international standards;
- **Comply with national environmental regulations and international standards** in order to ensure no net loss of biodiversity via Ambatovy's Environmental Management System (AEMS); to adequately fund and staff the AEMS; to ensure the legal protection, long-term management and

financing of Ambatovy's land offsets; and to consistently use clear metrics to measure loss and gain of biodiversity;

- **Ensure external controls of our activities** through continued use of third party expertise and sound science-based programs, as well as open and transparent collaboration with authorities charged with supervising our environmental and social activities;
- **Create a rewarding workplace** that attracts the best industry talent, emphasizes skills development, and engages and develops our workforce;
- **Maintain the safety and security of our surroundings** by committing to Zero Harm in order to build a safe working environment, by ensuring the security of our employees and assets in accordance with the guidance of the Voluntary Principles on Security and Human Rights, and by supporting a Safety Culture within Ambatovy's areas through effective risk management, active communication, training and awareness-raising, and ongoing community engagement.

This commitment is reflected in our new Health and Safety, Environment, Community and Quality Policy (which can be found on our website at www.ambatovy.com/en/who-we-are/our-policies). It is not only internalized within Ambatovy's activities but is also expected of our suppliers and contractors. In this way, we hope to further increase the positive impacts we have in the country and extend our best practices across the industry.

The Sustainable Development Goals

The United Nations' Sustainable Development Goals (SDGs), which followed the Millennium Development Goals, consist of 17 ambitious goals aimed at tackling global challenges and securing a sustainable and resilient world by 2030. Success depends on the engagement of governments, communities, NGOs, and corporations alike.

The natural resources sector plays a significant role, with economic, social, and environmental effects on the areas where it operates. This sector holds considerable potential to advance all 17 SDGs. Organizations can incorporate relevant SDGs into their operations, affirm their current practices, and leverage collaboration with stakeholders to maximize impact.

As a responsible company operating in a low-income country and biodiversity hotspot, we strive to minimize and mitigate any negative impacts of our activities, while focusing on actions that benefit local communities and the country as a whole. The SDGs serve as a framework to evaluate how we contribute

to Madagascar's development and progress toward these internationally recognized goals.

For more details on our contributions to the 17 SDGs, see Appendix 1.





Key Impacts, Risks and Opportunities

Environmental, Social and Governance (ESG) and sustainability considerations continue to gain momentum across all industries, and the mining sector is no exception. Companies are increasingly committing to a more responsible approach to economic activities, one that reflects the growing expectations of stakeholders, and embraces transparency and accountability.

ESG provides a framework to gauge a company's exposure to environmental, social, and governance risks and its performance in managing them. For mining operations, this means understanding how these factors may affect our ability to raise capital, secure authorizations and permits, collaborate with local authorities and communities, and protect our long-term assets. At the same time, ESG presents opportunities to improve energy efficiency, enhance operational performance and build stronger relationships with stakeholders.

The growing awareness of ESG poses both challenges and significant opportunities for the mining industry. It encourages innovation, reduces environmental impact, and reinforces the need to deliver tangible societal benefits. This shift engages not only mining companies, but also governments, businesses, and civil society to create shared value.

At Ambatovy, we recognize the unique economic, social and environmental landscape of Madagascar. Our operations bring significant benefits – including job creation, economic growth, infrastructure development, and industrial capacity building – but we also understand the importance of managing potential negative impacts.

Operating in a country with exceptional biodiversity and socio-economic vulnerabilities requires careful stewardship. If not managed responsibly, mining activities could disrupt delicate ecosystems and exacerbate poverty. We therefore conducted thorough assessments before starting operations and remain vigilant in our monitoring and mitigation efforts.

Each year, in consultation with our stakeholders, we identify the ESG impacts and opportunities most relevant to our context. We then prioritize those with the greatest potential to affect the environment, stakeholders, or our operational efficiency. Our goal is to strike a balance between minimizing risks and delivering value in a safe, responsible, and efficient manner.

In recent years, we have shifted our focus from merely establishing a presence in Madagascar to building meaningful, lasting partnerships and ensuring the long-term sustainability of our actions and investments. This approach reflects our dedication to responsible mining and stakeholder engagement.

ESG considerations are now an integral part of our corporate culture, and we are working to ensure they are fully integrated into every aspect of our operations. Our current focus areas include:

- Economic: Local employment and training, taxes and government payments, local procurement and supplier development, infrastructure contributions.
- Environment: Biodiversity, protected areas and habitats, ecosystem services, water management, air quality, noise, energy, tailings and waste management, climate change (carbon footprint, and GHG emissions), hazardous substances, and mine closure planning.
- Social: Human rights, land use and acquisition, resettlement, stakeholder engagement, social investment, diversity, labor conditions, health and safety, security, and post-closure planning.
- Governance: Legal compliance, business ethics, anti-fraud, anti-bribery and corruption measures, transparency and disclosure, corporate governance and risk management systems.

Economic

Many extractive companies in sub-Saharan Africa opt to refine their minerals in Asia, Europe, or North America. Ambatovy's choice to refine its products domestically delivers significant local benefits, such as creating thousands of additional jobs accompanied by professional training and career development opportunities, generating substantial revenue for the Government of Madagascar, boosting local procurement of goods and services, fostering technology transfer and capacity building, and developing critical infrastructure. These efforts contribute significantly to Madagascar's economic growth and will continue to do so for years to come.

There is enormous potential for extensive positive financial benefits for the communities and the country through wages and supply contracts. There is also the potential to improve the capacity to deliver goods and services of international quality.

We work to maximize these positive impacts through targeted programs to increase local supply, promote local employment, and support income-generating activities for community members. Identified negative impacts include the potential for price inflation and increased strain on municipal services as people move into the communities surrounding our operations looking for economic opportunities. However, these are more than compensated for by the aforementioned economic benefits.

In recent years, our industry has seen a growing requirement from manufacturers and consumer-facing companies to demonstrate responsibility, in their supply chains, which is subsequently putting pressure on upstream mining companies to demonstrate social and environmental responsibility, with a strong focus on human rights, labor rights, and occupational health and safety. Customer expectations for mining companies have risen significantly, requiring high ESG standards alongside safe and efficient mining and processing.

Environmental

Ambatovy operates at the southern edge of Madagascar's eastern rainforest, a globally significant biodiversity hotspot. Protecting this unique natural heritage has been a priority since the earliest planning stages of our operations. The surrounding forests, many of them partially degraded, have long been under pressure from human activities such as hunting, gathering, selective logging, slash-and-burn agriculture, uncontrolled fires, and species collection for trade and consumption. These pressures often predate our presence, but they shape the environmental context in which we operate and the responsibilities we bear.

Operating in such a sensitive ecosystem demands rigorous environmental stewardship. We have embedded avoidance, mitigation, and conservation measures into every stage of our business plans and operational processes. Our approach combines scientific expertise with strong community partnerships, engaging local stakeholders in conservation, sustainable resource use, and habitat restoration. These collaborations not only safeguard biodiversity but also create shared value by fostering environmental awareness and alternative livelihoods.

Our environmental commitments are shaped by Madagascar's regulatory framework, international best practice, and voluntary programs such as the Business and Biodiversity Offsets Program (BBOP), for which Ambatovy was a pilot project. Through BBOP, we aim to achieve No Net Loss of biodiversity and have dedicated significant financial and human resources to achieving measurable, long-term results.

In 2024, we maintained our focus on continuous improvement in critical areas such as tailings management, water stewardship, air quality, and climate resilience. Following industry-wide lessons from dam failures in other countries, we continued to upgrade and strengthen our tailings facilities, aligning progressively with the Global Industry Standard on Tailings Management (GISTM). These facilities are managed and monitored around the clock by a dedicated engineering team, supported by robust risk assessments and independent reviews.

We also intensified our work on climate change adaptation and greenhouse gas (GHG) emissions management. As the global demand for nickel and cobalt – key materials in the clean energy transition – continues to grow, Ambatovy is integrating climate considerations into operational planning and exploring opportunities to reduce our carbon footprint while maintaining high production standards.

For Ambatovy, environmental responsibility is not an isolated function but an essential pillar of operational resilience and

stakeholder trust. By aligning our actions with global initiatives, national priorities, and local community needs, we aim to minimize our impacts, preserve Madagascar's biodiversity, and ensure the long-term sustainability of the natural systems that our business and surrounding communities depend on.

Social

In a context of persistent socio-economic challenges, large companies operating in the natural resource sector continue to face increasing expectations from stakeholders. In 2024, local communities, civil society, regional authorities, and the national government looked to mining operations like Ambatovy's to deliver lasting and meaningful benefits, as the sector is widely viewed as a key driver of development.

At the same time, the year brought significant challenges. Ongoing volatility in global metal markets put pressure on the industry while technical difficulties temporarily disrupted our operations, requiring adjustments and additional efforts to stay on track. Despite these challenges, we were able to

Building Madagascar's Future Together

Ambatovy represents one of the largest-ever private investments in Madagascar's history, anchoring a platform for inclusive economic growth and local development that extends far beyond our operational boundaries.

With every kilometer of pipeline constructed, training session delivered, and conservation project implemented, Ambatovy is helping shape a stronger foundation for the next generation of Malagasy professionals, entrepreneurs, and environmental stewards.

Our integrated approach creates lasting impact: transferring critical technical skills, building local supplier capacity, and developing environmental programs where communities become trained biodiversity monitors and conservation advocates. These initiatives don't just meet today's needs – they equip local communities with the tools and knowledge for long-term prosperity.

As we expand our sustainability commitments, we are not just extracting resources – we are contributing to building resilience, knowledge, and shared prosperity that will support Madagascar's progress long into the future.



count on the support of local communities, a crucial factor in fostering a constructive and sustainable relationship with our stakeholders.

In light of these circumstances, Ambatovy remains fully committed to meeting national regulations and upholding the IFC Performance Standards. Our focus remains on minimizing negative impacts and maximizing the positive contributions our operations can bring to surrounding communities. At the same time, we recognize that the provision of essential public services – such as education, healthcare, and infrastructure – remains first and foremost the responsibility of the government.

To enhance the impact of our initiatives, we prioritized strategic partnerships that bring together the expertise and resources of multiple stakeholders. These collaborations were designed to complement, rather than replace, government efforts while ensuring sustainable and locally adapted solutions. Despite the economic and operational challenges of 2024, Ambatovy remained firmly committed to supporting the long-term development of the regions in which it operates, helping to promote inclusive, resilient growth.

Governance

At Ambatovy, we are committed to conducting all activities with integrity and upholding the highest standards of responsible conduct. This commitment includes avoiding both actual and perceived conflicts of interest, maintaining zero tolerance for corruption in any form, and respecting the rights of all individuals with whom we engage.

We achieve this through the rigorous implementation of our Business Ethics Code, Anti-Corruption Policy and Human Rights Policy across all levels of our operations.

Transparency is a cornerstone of our approach. We actively participate in the Extractive Industries Transparency Initiative (EITI) process in Madagascar, through the EITI National Committee, ensuring the disclosure of our financial and operational information in compliance with EITI standards. Additionally, by implementing the Voluntary Principles on Security and Human Rights (VPSHR), we align our security operations and policies with the highest international standards for both security and human rights.



Sustainability-related risk management is the responsibility of the Executive Committee and the Environment, Health and Safety, Sustainability sub-committee.

This sub-committee meets quarterly to discuss issues that have arisen over the period and to authorize any significant changes to our plans and management strategies. We remain committed to managing these impacts, risks and opportunities, and to improving our ESG performance.



Stakeholder Engagement

At Ambatovy, we believe that sustainable development depends on strong, inclusive, and respectful relationships with all those affected by our activities. As a responsible mining operation, we are committed to building and maintaining constructive, transparent, long-term partnerships with local communities, civil society, government entities, employees, business partners, and the broader public. Through open dialogue and collaboration, Ambatovy aims to align its operations with shared sustainability goals, generating positive socio-economic and environmental impacts.

Our engagement takes many forms, including community forums, targeted workshops, regular consultations, and accessible grievance mechanisms. These platforms ensure that a wide range of voices, including those of women, youth, and other vulnerable groups, are heard and considered in decision-making processes. We prioritize equitable participation and work to ensure that all stakeholders can meaningfully shape the direction and impact of our activities.

This inclusive approach helps build lasting partnerships and create shared value. By integrating diverse perspectives, we strengthen our resilience and improve our ability to support long-term progress. Responsible engagement also ensures compliance with national regulations, reinforces our social license to operate, and upholds our reputation for ethical and responsible business conduct.

Effective engagement is a cornerstone of sustainable business practices. Trust-based relationships create a foundation for mutual understanding, risk mitigation, and collective action to address local priorities. These partnerships lead to more impactful outcomes for both the business and the communities where we operate. Transparent communication further supports these efforts, and deepens long-term collaboration grounded in respect, integrity, and shared goals.

Stakeholder engagement is a dynamic, two-way process. Feedback plays a key role in the continuous improvement of our strategies and operations. For example, collaborative dialogue has helped us enhance emergency preparedness planning – particularly relevant during Madagascar’s cyclone seasons – bringing benefits to both the company and host communities.

Recognizing that stakeholder needs and expectations evolve, our engagement strategy is designed to be flexible and responsive. We continually adapt our approach based on the feedback we receive and the changing social and environmental context.

To guide this evolving process, we rely on a comprehensive Stakeholder Engagement Plan that outlines how we identify, map, and interact with stakeholders based on their interests and influence. The plan defines engagement objectives, methods, responsibilities, and includes monitoring and reporting systems to ensure transparency and accountability.

Engagement efforts involve employees at all levels, from frontline workers to senior leadership, reflecting a company-wide commitment to sustainability and responsible business conduct. This shared commitment helps ensure that engagement is integrated into every aspect of our operations and strengthens our connection with communities.

Transparency and integrity remain at the heart of our approach. We commit to open and honest communication, ensuring that feedback leads to meaningful action and continuous improvement. By maintaining clear accountability and regularly reporting on our progress, we build trust with stakeholders and reinforce our pledge to conduct business responsibly and ethically. Our goal is to create opportunities for inclusive economic growth and social progress that are accessible to everyone.

Sustainability principles are woven throughout our efforts as we work closely with communities and stakeholders to deliver long-lasting economic, social, and environmental value. Together, we address concerns, manage risks, and co-develop solutions that drive progress.

Ultimately, stakeholder engagement is not a one-off effort but an ongoing, evolving process that supports our broader vision for sustainable development. By embedding these principles into our



operations, Ambatovy contributes meaningfully to community well-being and Madagascar's long-term development. Our efforts are aligned with national priorities and global frameworks such as the UN Sustainable Development Goals, reinforcing a collective vision for sustainable progress.

In 2024, our stakeholder engagement activities raised a range of important concerns, reflecting the key priorities of those impacted by or interested in our operations. These issues remain central to our continued efforts to operate responsibly and sustainably.

The main topics raised include:

- Health, safety, and security
- Community safety and emergency response
- Cyclone preparedness and response
- Livelihood development
- Access to resources
- Royalties
- Employment and business opportunities
- Operational impacts
- Compliance with national and international standards
- Social investments and the Social Investment Fund
- Rice field restoration
- Grievance management
- Good governance and responsible sourcing
- Mining sector and Mining Code revision
- Opportunities for collaboration
- Global nickel prices
- Pipeline maintenance and replacement

The Social Investment and Community Engagement team holds regular meetings with key committees set up to enhance our stakeholder engagement plan. These meetings take place quarterly in Toamasina, Moramanga, and Brickaville, ensuring comprehensive coverage of all administrative areas near our operations. Over time, the following engagement platforms have been developed:

- Local Authorities
- Mine Lease Committee
- Employability Committee
- Resettlement Committee
- External Grievance Officers
- External Oversight Grievance Committee

These platforms enable meaningful, two-way exchanges of information, strengthening mutual understanding of stakeholder expectations, needs, and concerns. The insights gathered help us continuously refine and improve our action plans.

These concerns were raised by a range of stakeholder groups, underscoring their importance and relevance to our operations. We remain committed to addressing them through ongoing engagement, transparent communication, and tailored strategies for each group. This approach ensures responsiveness to local needs and alignment with global sustainability objectives.

Malagasy Government and Regulatory Bodies

Ambatovy strives to maintain an open and transparent relationship with the Government of Madagascar at all levels, as well as with regulatory bodies overseeing our operations. We achieve this through continuous engagement and reporting, often exceeding our legal obligations. We regularly meet with relevant ministries and authorities at national, regional, and local levels, and frequently host representatives for site visits to provide them with a deeper understanding of Ambatovy's operations, approaches, and challenges. In 2024, we collaborated with government officials on several important matters and policy issues specific to Ambatovy, including VAT-related concerns (with the support of the Japanese and Korean Ambassadors), the decree on the pipeline replacement project, local sales of ammonium sulphate, and import/export clearance matters. We also hosted several key authorities at our Mine and Plant Sites to provide on-the-ground insights. As in previous years, Ambatovy maintained close collaboration with the ONE regarding our environmental and social commitments.

Ambatovy's stakeholders are identified as those who have been directly or indirectly impacted by our activities, who have an interest in the company, and/or who have the ability to influence matters, be it positively or negatively. Through our stakeholder identification process, we have identified ten groups of national and international stakeholders:

- Malagasy Government and Regulatory Bodies
- Regional and Local Authorities
- Local Communities and People Affected by the Project (PAPs)
- Malagasy General Public
- International Community
- Civil Society Organizations and Local Non-Governmental Organizations (NGOs)
- Press and Media
- Private Sector/Business Community
- Our Employees and Contractors
- Our Shareholders and Lenders

Regional and Local Authorities

As with our counterparts at the national level, Ambatovy works closely with regional and local authorities across many aspects of its operations. To promote transparency and maintain open communication, we regularly host informational visits and site tours for these authorities.

In 2024, we strengthened our partnerships with regional stakeholders by signing a Convention with the District of Moramanga, establishing a formal framework for collaboration. We also worked with local authorities on initiatives including technical assistance for farmers, reforestation programs, youth development and child protection efforts, and the construction of schools and classrooms.

Local Communities and People Affected by the Project (PAPs)

Ambatovy is committed to contributing to sustainable development by building strong, transparent relationships with the communities surrounding its operations. Recognizing that our activities can have both positive and negative impacts, we place a high priority on maintaining regular dialogue with local stakeholders, including traditional authorities and fokontany representatives, to promote collaboration and mutual understanding.

In 2024, Ambatovy reinforced this commitment through targeted initiatives along the Pipeline, near operational sites, and in conservation areas. These efforts focused on sharing information and raising awareness, promoting income-generating activities to strengthen local livelihoods, supporting sustainable forest and water resource management, and helping communities build stronger governance structures. We also worked closely with farmers' organizations and supported the efforts of 32 Local Watch Associations (LWAs), which monitor key parts of our infrastructure, from the Mine and Pipeline to the Plant Site and Tailings Facility.

Over the past year, Ambatovy's Social Investment and Community Engagement teams conducted more than 1,740 formal and informal interactions with stakeholders. These meetings covered a wide range of topics, including risk management, environmental and social safeguards, security, child protection, and responsible natural resource use. Through these collaborative efforts, we strive to strengthen trust, reduce risk, and support the long-term well-being and resilience of communities closest to our operations.

Malagasy General Public

As part of its broader stakeholder engagement strategy, Ambatovy places strong emphasis on building transparent, constructive relationships with the Malagasy public. Recognizing the importance of public trust, the company adopts a proactive approach to information sharing, outreach, and direct engagement to foster better understanding of its activities and address misinformation.

In 2024, Ambatovy implemented a multi-faceted public engagement strategy. Over 3,100 visitors were welcomed to our operational sites, and more than 3,600 people visited our Information Center. We also organized 80 public information sessions, reaching over 4,800 participants. Our presence at various events enabled direct engagement with more than 14,000 visitors at our booths, where they could learn more about our operations, sustainability initiatives, and contributions to national development.

To further promote responsible mining and inclusive growth, Ambatovy participated in 39 key national and local events, including fairs, conferences, and workshops. These events focused on key topics such as sustainability, employment, environmental protection, health and safety, good governance, local procurement, and community development. Notably, Ambatovy played an active role in the annual Corporate Social Responsibility and Sustainable Development Initiatives Fair (*Salon RSE-IDD*) and participated in major economic events such as *FIER Mada* and *Foire Taom'Ketrika*, as well as environmental events such as the *Festival des Amphibiens*.

Ambatovy also contributed to public discussions and research on mining-related topics. In April 2024, the company participated in a public debate on relocation and compensation, engaging with key stakeholders including project-affected persons (PAPs), civil society organizations, and regulatory bodies. Ambatovy also contributed to civil society-led surveys examining the social and environmental impacts of large-scale mining.

Throughout these efforts, Ambatovy ensured that its public engagement strategy remained aligned with national and regional priorities, reinforcing its commitment to transparency, accountability, and long-term partnership with the Malagasy public.



International Community

Ambatovy actively engages with the international community in Madagascar, which includes diplomatic missions, UN agencies, donors and international non-governmental organizations (INGOs). This engagement helps create and reinforce synergies between Ambatovy and other international actors, providing valuable opportunities to build a climate of trust, respect and

openness, while exchanging information, developing best practices, and establishing partnerships. Such partnerships are vital for maintaining our social license to operate, ensuring our initiatives complement those of other stakeholders, making the most of each partner's expertise, and achieving a greater and more sustainable impact.

In 2024, Ambatovy engaged in discussions on critical materials and the Inflation Reduction Act (IRA) with members of the U.S. House of Representatives during their visit to Madagascar focused on the African Growth and Opportunity Act (AGOA). We also hosted visits from key ambassadors and showcased our work during the official visit of Japan's Minister of Foreign Affairs to Madagascar.

Civil Society Organizations and Local Non-Governmental Organizations (NGOs)

We engage actively with civil society organizations where common interests and concerns exist, whether these are broad policy issues with a national scope or local issues that affect communities around our operations. Consistent with our approach to all stakeholders, we respect the views of civil society groups and seek to build dialogue in a constructive manner. We are pleased to partner with a number of civil society organizations that collaborate with us on the implementation of programs that fulfil our commitments to our stakeholders and that help meet our objectives.

In 2024, we maintained our partnership with the local NGO SAHA to support and assist communes that receive royalty payments from Ambatovy, focusing on capacity building and sustainable development initiatives. We also engaged regularly with civil society groups such as OSCIE and Transparency International providing updates on Ambatovy's operations, sustainability initiatives, and contribution to Madagascar's mining sector development.

To further promote transparency, Ambatovy participated in key public forums and multi-stakeholder consultations throughout 2024. We contributed to independent assessments of mining industry practices and participated in collaborative dialogues on responsible mining standards. Building on our ongoing public engagement, we continued discussions with key stakeholders, including project-affected persons (PAPs), civil society organizations, and regulatory bodies to address operational matters and advance community development.

Press and Media

The media plays a crucial role in promoting transparency and fostering public trust in Ambatovy's operations. As a key stakeholder, the press serves as an important conduit for sharing accurate information, addressing concerns, and ensuring balanced reporting on Ambatovy's activities. Through consistent engagement, we ensure that journalists receive timely, verified updates on our operations, policies, and socio-economic contributions.

To strengthen this relationship, Ambatovy maintains open communication with journalists through regular information sessions, press briefings, and organized site visits. In 2024, we conducted 21 information sessions with 106 economic journalists and held five meetings with 16 editorial leaders. These interactions provided a platform to share our latest initiatives and address industry-related questions.

Major media coverage throughout the year included the inauguration of drinking water supply pumps in Moramanga and our partnership with CISCO (*Circonscription Scolaire*, or local school district) to support education.

To reinforce transparency and counter misinformation, Ambatovy produced a series of videos showcasing the socio-economic impacts of its work. These were shared across multiple media platforms, offering tangible insights into community-level outcomes.

During the Pipeline incident in September 2024, Ambatovy proactively engaged with the media to ensure timely and accurate reporting. A press conference held in Antananarivo on September 27, reinforced our commitment to openness and accountability. Media coverage highlighted our swift response and transparent communication throughout the incident.

Digital Engagement: Website and Social Media

In an increasingly connected world, digital communication remains central to Ambatovy's approach to transparency, accountability, and stakeholder engagement. In 2024, we strengthened our online presence to deliver timely, multilingual updates on our operations, sustainability efforts, and community-based initiatives. These included initiatives focused on the environment, health and safety, education, and employment.

Our social media platforms, including Facebook and LinkedIn, continued to grow in reach and influence. By sharing regular updates, community impact stories, and interactive content, we increased engagement with key audiences, especially youth and urban populations. In total, Ambatovy was mentioned 4,271 times online, with 97.2% of these mentions reflecting objectives and positive initiatives. Our social media following grew by 5.54% to 233,043 followers, with 193 posts published throughout the year. These platforms have proven effective in facilitating two-way communication, allowing us to both inform and listen to stakeholders.

Complementing our social media presence, Ambatovy's official website remained a centralized and comprehensive source of information, providing stakeholders with access to company updates, project milestones, procurement opportunities, and sustainability reports. The site recorded 75,000 visits in 2024, with the most popular pages being Join Our Team (22,000 visits), Home (13,000 visits), and Career (10,000 visits).

Together, these platforms have deepened public understanding of our work, reinforced transparency, and strengthened

relationships with diverse stakeholder groups. Looking ahead, we remain committed to evolving our digital strategy to foster meaningful, inclusive engagement and build lasting trust.

Our Employees

At Ambatovy, we prioritize hiring national employees whenever possible and are committed to developing a skilled local workforce. Recruiting, developing, and retaining talented, motivated employees makes us more productive, drives better business results, and strengthens our position as an employer of choice in Madagascar. As of December 2024, Ambatovy had 3,674 direct employees (of whom 89% are Malagasy). Ambatovy also has many contractor companies that work at our sites for various projects and assignments and for various durations.

Over the years, thousands of Malagasy employees and contractors have received technical, operational, leadership and administrative training. Investing in such training provides them with the skills required to assume roles with increasing responsibility during the life of our operations. Partnerships with local technical schools also strengthen capacity building for our workforce and the wider community.

At Ambatovy, we believe that our employees are our greatest strength. Their involvement is fundamental to our success and to building trust with the communities around us. As ambassadors within their families, social circles, and communities, they play a vital role in shaping Ambatovy's reputation. In 2024, we focused on strengthening team spirit, improving communication, and fostering a supportive work environment. We encouraged open dialogue and collaboration to keep employees motivated, connected, and ready to meet challenges together.

To keep employees informed and connected, we used a range of internal communication tools throughout 2024. These included the Ambatovy News newsletter, digital screens, an internal Facebook group, the company intranet, and text messaging. A notable innovation was a new email platform designed to boost interactivity, track employee engagement with shared content, and support the assessment of internal communication effectiveness.

Several engagement activities were organized throughout the year to foster team spirit and promote organizational cohesion. Employees proudly represented Ambatovy at national events, including the International Women's Day parade on March 8 and the Independence Day parade on June 26. Exchange visits between staff from the Mine and Plant Sites helped break down silos and build interdepartmental collaboration. Additionally, site tours for new employees provided valuable insight into Ambatovy's operations and corporate culture. In total, more than 240 employees across the organization participated in these initiatives.

A major highlight of 2024 was the return of the Internal Open Door (IOD) event, which had been suspended since the COVID-19 pandemic. Its scope was expanded to include not only employees but also their families, recognizing their role as valued ambassadors of the company. Departments across Ambatovy showcased their work, enhancing mutual understanding and collaboration across the organization.

A dedicated Partner's Day, organized in collaboration with the Works Council, welcomed external service providers including banks, insurance companies, suppliers, and local artisans, who offered exclusive services and benefits to employees and their families. The event was a great success, attracting over 11,000 visitors over four days at the Plant Site and three days in Moramanga.

Family engagement remained a priority in 2024, with over 1,000 visitors joining family site visits that strengthened ties between work and home. On International Family Day, employees participated in activities organized by the We Are Ambatovy employee social club. Through voluntary employee contributions, the club donated food, toys, and essential supplies to three orphanages in Moramanga and Toamasina, supporting over 220 vulnerable children – a reflection of our broader commitment to social responsibility and community involvement.

To promote open dialogue between leadership and staff, three Town Hall Meetings were held during the first three quarters of 2024. Attended by over 3,100 employees, these sessions provided updates on company developments and goals, and gave employees the chance to engage directly with the President and senior management.

In 2024, Ambatovy also launched several company-wide campaigns to strengthen workplace culture and promote shared responsibility. These included the Waste Elimination Program, a comprehensive cybersecurity awareness campaign, an energy conservation drive, and an Anti-Fraud, Bribery, and Corruption (FBC) initiative. Each campaign was designed to foster accountability, encourage proactive engagement, and reinforce a sense of ownership among employees in their day-to-day activities.

Employee well-being was also a top priority. In September, we dedicated the entire month to health awareness. Campaigns throughout the year addressed topics including cardiovascular health, breast and prostate cancer, diabetes, fatigue, hand injury prevention, heat stress, tobacco use, malaria, and HIV/AIDS. These initiatives reinforced our commitment to creating a safe, healthy, and supportive workplace.

Ambatovy's employee engagement strategy is founded on the principle that a well-informed, connected, and empowered workforce drives both operational excellence and a positive organizational culture. The initiatives undertaken in 2024 reflect our dedication to fostering inclusion, collaboration, and pride in the workplace, while recognizing the essential role that employees and their families play as ambassadors for the company.



Looking ahead, we remain focused on deepening engagement efforts, evolving our communication strategies, and aligning employee initiatives with our broader sustainability goals. Our goal is to ensure that every member of our workforce continues to thrive and make meaningful contributions to both Ambatovy and the communities we serve.

Our Shareholders and Lenders

Our shareholders and lenders play a vital role in supporting Ambatovy's long-term success. Since 2007, our financing has been backed by a consortium of 14 commercial banks, development banks, and export credit agencies, alongside our Sponsors.

In December 2024, Ambatovy achieved a major milestone with the successful completion of a debt restructuring plan, sanctioned by the High Court of Justice in England and Wales.

This agreement resulted in the forgiveness of US \$1.7 billion in subordinated and senior debt, significantly strengthening our financial foundation.

As part of the restructuring, Ambatovy secured new, more flexible debt facilities with improved terms, including repayment linked to cash flow and no fixed expiry dates. Additional funding from our sponsors, along with US \$95 million in available senior funds, further enhanced our liquidity and operational resilience. Together with a clear cash flow plan aligned to our 2025 forecasts, these measures ensure that Ambatovy is well-positioned to sustain operations over the next 12 to 15 months and beyond.

This restructuring underscores our commitment to long-term financial sustainability and reinforces our ability to deliver responsible value to all stakeholders while maintaining resilience in a dynamic global market.





Governance and Human Rights

Objectives

- Strive to meet and, where possible, exceed applicable laws, regulations, and voluntary commitments, including those associated with our operations, financing arrangements and stakeholder expectations.
- Ensure that all employees and contractors adhere to Ambatovy’s standards of ethical behavior, integrity, and respect for human rights.
- Contribute to the promotion of good governance within Madagascar’s mining sector.

Approach

We are dedicated to operating with integrity, transparency, respect, and the highest ethical standards, forming the foundation for Ambatovy’s commitment to our communities, partners, and employees. We prioritize considering the interests of our stakeholders in decision-making and uphold respect for culture, customs, values, and human rights in all interactions with those impacted by our activities. This commitment includes avoiding actual or perceived conflicts of interest, maintaining zero tolerance for any form of corruption, and upholding the rights of everyone we engage with. We achieve this by diligently enforcing our Business Ethics Code, Anti-Corruption Policy, and Human Rights Policy, supported by robust systems and programs to meet our standards and expectations. Our policies for responsible business conduct can be found on our website at: www.ambatovy.com/en/who-we-are/our-policies/.

We hold all employees, regardless of their position, responsible for respecting both their fellow employees and the communities around our operations. We also expect that the companies with which we work maintain the same level of ethical behavior. Our suppliers and contractors are required to sign a Supplier Code of Conduct and to fulfill certain labor requirements if they wish to do business with us. Our Supply Chain Management (SCM) team is responsible for educating our suppliers and ensuring their compliance with our standards.

Human rights issues are an inherent risk to all mining sites around the world. To manage this risk, we are aligning with international best practices and expectations regarding human rights, and we take human rights very seriously, in line with our commitment to minimizing actual and potential negative impacts of our operations on local communities. Human rights protection and awareness have been integrated into our operational and sustainability strategies. We have a formal Human Rights Policy that affirms the commitment of Ambatovy to operate in a way that

respects human rights as set forth in the Universal Declaration of Human Rights (UDHR). Human rights are addressed through the IFC Performance Standards, with which we are obliged to comply, and we adhere to the Voluntary Principles on Security and Human Rights (VPSHR) in all of our areas.

We believe that human rights are everyone’s responsibility and, as a major purchaser of goods and services in Madagascar, we have worked to ensure that human rights violations are not present in our supply chains. Both employees and external stakeholders have access to Ambatovy’s Grievance Management and Whistleblower Systems for filing grievances on any subject and raising issues of concern, including unethical behavior and human rights violations. We are committed to investigating any violations and ultimately aim to prevent such violations before they take place by informing our employees and key stakeholders of our expectations with regards to respect, honesty, and integrity.

Performance



Compliance to External Initiatives (Mandatory and Voluntary)

Ambatovy strives to maintain the highest standards, to respect local culture and traditions, and to comply with the laws and regulations of Madagascar. We endeavor to meet and, when possible, exceed the mandatory compliance requirements of our agreements with the Government of Madagascar, our lenders, and other stakeholders. We are also committed to several voluntary measures that go beyond our legal obligations. More information about each of these mandatory compliance and voluntary commitments can be found in Appendix 3.

Mandatory Compliance

	Law on Large Scale Mining Investments (<i>Loi sur les Grands Investissements Miniers, LGIM</i>)
	Decree on Rendering Investments Compatible with the Environment (<i>Décret sur la Mise en Compatibilité des Investissements avec l'Environnement, MECIE</i>)
	International Finance Corporation (IFC) Performance Standards
	Equator Principles

Voluntary Commitments

	Standard on Biodiversity Offsets (BBOP, 2012) ¹
	Voluntary Principles on Security and Human Rights (VPSHR)
	Extractive Industries Transparency Initiative (EITI)
	International Organization for Standardization ²
	Responsible Minerals Initiative (RMI)
	Global Industry Standard on Tailings Management (GISTM)
	International Council on Mining and Metals (ICMM)

In 2024, Ambatovy remained actively engaged in a range of international standards, certifications, and voluntary initiatives that promote responsible mining practices. These include ongoing efforts in transparency, ethical mineral sourcing, environmental and safety certifications, and human rights-based security protocols. Together, these efforts reflect our commitment to integrity, continuous improvement, and meaningful contributions to sustainable development in Madagascar.

Key highlights from our compliance and voluntary initiatives in 2024 are outlined below.

- Ambatovy has been a long-standing supporter of the Extractive Industries Transparency Initiative (EITI) process and remains an active member of Madagascar's Multi-Stakeholder Group (referred to as the National Committee). In 2024, Ambatovy continued its strong engagement in the National Committee of EITI Madagascar, contributing to several key milestones:
 - The finalization and publication of the 2021 EITI report on February 6, 2024;
 - Successful third-party validation of EITI Madagascar on March 20, 2024;
 - Ongoing support for the implementation of systematic disclosure in Madagascar, including recommendations for future improvements;
 - Participation in the regional EITI workshop held in Abidjan from May 28 to 30, 2024;
 - Finalization and publication of the 2022 EITI Report on December 31, 2024.

- In 2024, Ambatovy reaffirmed its vision: *“To be recognized as a responsible and successful producer of high-quality nickel and cobalt that creates lasting value for all stakeholders while contributing to sustainable development in Madagascar.”* In line with this vision, Ambatovy DMSA maintained the following certifications, which apply specifically to its operations:

- ISO 14001:2015 for its Environmental Management System
- ISO 45001:2018 for its Occupational Health and Safety Management System
- ISO 9001:2015 (Third Re-certification) for the Quality Management System, covering refining, analysis, and shipping of nickel, cobalt and ammonium sulfate products.

While the Environment and Health & Safety management systems are implemented across all Ambatovy operations, the formal ISO certifications are held exclusively by Ambatovy DMSA. In August 2024, an annual surveillance audit was conducted covering all three standards for DMSA. All certifications were successfully maintained. No major non-conformities were found, and only four minor non-conformities were reported.

- Ambatovy continues to fully support the Responsible Minerals Initiative's Responsible Minerals Assurance Process (RMI-RMAP) and complies with:
 - The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and
 - The Cobalt Refiner Supply Chain Due Diligence Standard.
 This ongoing commitment ensures Ambatovy aligns with international best practices for ethical sourcing and transparency in the nickel and cobalt supply chains.
- Ambatovy's supply chain is unique due to its fully integrated structure. All nickel and cobalt ore is mined, transported, processed and refined by Ambatovy in Madagascar, with no

¹The Business and Biodiversity Offsets Program (BBOP), initiated in 2004, was a partnership of some 80 leading organizations, companies, financial institutions, governments and civil society groups from around the world. The aim was to develop and test best practices for conservation and biodiversity offsets by following the mitigation hierarchy. It is considered a best practice approach to reducing the negative impacts of public and private sector development projects on biodiversity and ecosystem services. The BBOP officially ended in December 2018; however, its principles have been adopted by international standards to which Ambatovy adheres, including the IFC Performance Standards and the Equator Principles.

²The International Organization for Standardization (ISO) is an independent, non-governmental organization and developer of voluntary international standards. It facilitates world trade by providing common standards across nations. Use of these standards ensures that products and services are safe, reliable, and of good quality.

third-party ore entering the supply chain. This single-source model was explicitly confirmed by the external RMI-RMAP auditor.

- Both the Mine and Plant Sites are located in Madagascar. Ambatovy conducts an annual assessment to determine whether Madagascar is considered a Conflict-Affected and High-Risk Area (CAHRA). Ongoing monitoring ensures the assessment remains valid. As of 2024 neither Madagascar nor Ambatovy (AMSA & DMSA) are classified as CAHRAs.
- Every year, Ambatovy carries out a risk assessment in accordance with Annex II of the OECD Due Diligence Guidance. The 2024 assessment was completed to identify and address potential risks that could have significant adverse impacts related to the extraction, trade, handling, and export of minerals globally – particularly from conflict-affected and high-risk areas. The results of the 2024 Risk Assessment confirmed that no red flags were identified for either AMSA or DMSA.
- The 2024 RMI-RMAP third party audit, originally scheduled for December 2024, was postponed to March 2025 due to both internal and international factors. This rescheduling was mutually agreed upon by Ambatovy and the Responsible Business Alliance Committee, which oversees the audit process in collaboration with the appointed third-party auditor.
- Ambatovy remains committed to the Global Industry Standard for Tailings Management (GISTM), which promotes zero harm to people and the environment, with a zero tolerance for fatalities. Although not a member of the International Council on Mining & Metals (ICMM), Ambatovy is actively implementing GISTM across the lifecycle of its Tailings Management Facility (TMF). As of 2024, we have achieved substantial alignment with the Standard, with compliance estimated at 90%, despite technical and financial constraints since late 2023. While the ICMM mandates its members to meet full compliance for facilities with “Extreme” or “Very High” potential consequences by August 2023 and all other facilities by August 2024, Ambatovy is voluntarily pursuing full adherence to these same timelines and requirements.
- In 2024, building on previous dam safety assessments and preparedness initiatives, Ambatovy advanced its emergency planning by refining and presenting its Emergency Preparedness and Response Plan (EPRP) and After-Failure Recovery Plan to both internal and external stakeholders. Although the National Office of Disaster Risk Management (BNGRC) postponed the planned emergency drill to 2025 due to an early cyclonic season, Ambatovy participated in the national SIMEX exercise. Acting as the regional private sector focal point, we coordinated humanitarian contributions and activated our internal response procedures during a simulated tailings spillway overflow caused by heavy rainfall. The exercise, organized by the BNGRC with support from the United Nations Office for Disaster Risk Reduction (UNDRR), brought together representatives from Mauritius, Seychelles, Comoros, and the SIMA Foundation. This initiative reinforced Ambatovy’s collaborative approach to risk management and its commitment to strengthening community resilience.



Business Ethics

Ambatovy’s core values require that we conduct our business in a moral and ethical manner and that our employees comply with all applicable laws. To support this conduct and provide clear guidance on what it means to act with integrity, Ambatovy has an Integrity Guide, a Code of Conduct, and a policy against discrimination and harassment in the workplace. These policies apply to all employees, including members of the Board of Directors, the Executive Committee, and any Ambatovy representative.

This Integrity Guide is part of Ambatovy’s Fraud, Bribery, and Corruption (FBC) program, launched in 2021 and aligned with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. It provides clear guidance on acting with integrity in all aspects of business. The Code of Conduct focuses on behavioral expectations related to safety, community engagement, use of company assets, confidentiality, and more. All employees are introduced to the Integrity Guide and Code of Conduct upon hiring. To reinforce understanding and commitment, annual online refresher courses are mandatory for all employees.

Our contractors are also required to comply with these ethical standards through a Supplier Code of Conduct, which outlines expectations related to environmental responsibility, human rights and labor practices, anti-corruption measures, and overall ethical behavior. When needed, Ambatovy engages with contractors and provides training on different topics, where contractor representatives acquire the necessary information with the expectation that they will return to their respective companies and share the knowledge and skills they have acquired with their co-workers.

To mitigate risks of conflicts of interest, Ambatovy requires contractors to disclose any potential conflicts with our personnel. Contractors must also sign a disclosure form agreement, which helps prevent undue influence during the bidding process and throughout the duration of the business relationship.

Human Rights

Protection of Children’s Rights

As a signatory to the Convention on the Rights of the Child (CRC), Madagascar is committed to upholding its principles. Ambatovy aligns with these principles through our Human Rights Policy. Our Zero-Tolerance Policy on child exploitation is mandatory for all employees to sign, and contractors are also required to comply with strict policies concerning child labor, forced labor, and the protection of fundamental human rights.

Human rights considerations are an integral part of our supplier selection process. For existing suppliers, periodic audits are conducted by the Ambatovy Local Business Initiative (ALBI) team and our Quality Management System (QMS) team. Any suspected or confirmed violation leads to immediate removal from our supplier list, as this constitutes a direct breach of our Code of Conduct.

Ambatovy’s commitment to the national campaign against child exploitation is fully aligned with our Environmental and Social Development Management Plan (PGEDS). We work with a range of stakeholders to address child protection issues within our host communities. In 2024, members of the Moramanga Child Protection Network (CPN) volunteered to support education and awareness around children’s rights. As an active CPN member, Ambatovy supported various initiatives led by the network, including awareness campaigns in six schools, which reached 3,558 students. Training sessions were also delivered to institutional stakeholders. In partnership with the Regional Directorate of Population and Solidarity of Alaotra Mangoro and the District Service of Population and Solidarity of Moramanga, Ambatovy facilitated a capacity-building program for 16 CPN members. This training focused on strengthening their ability to offer psychosocial support in cases involving gender-based violence and child protection. Through these efforts, we aim to help build a safer, more supportive environment for children while equipping CPN members with the tools to promote and uphold children’s rights in their communities.

Voluntary Principles on Security and Human Rights (VPSHR)

Ambatovy is committed to maintaining a safe and secure working environment while respecting the rights and freedoms of individuals. Our approach to security is grounded in national laws, international best practices, and the Voluntary Principles on Security and Human Rights (VPSHR), which guide our efforts to balance effective protection with respect for human rights.

We proactively manage and respond to security risks, working in close collaboration with public authorities, and we investigate all security-related incidents and concerns, taking corrective actions as needed.

As part of our commitment to VPSHR, we provide annual training to public and private security personnel working at our sites.

In 2024, AMSA and DMSA teams trained a total of 1,657 public and private security staff. This training is mandatory for all new security personnel at the Mine and Plant Sites and is supplemented with regular refresher sessions.



The Ambatovy Grievance Management System

Ambatovy is fully committed to upholding human rights across all aspects of its operations, in line with the United Nations Guiding Principles on Business and Human Rights. These principles outline both the State’s duty to protect human rights and the responsibility of businesses to respect them – responsibilities Ambatovy takes seriously.

As part of this commitment, we have established clear and fair mechanisms for individuals, particularly those in local communities, to raise concerns and seek solutions. Our community engagement processes are designed not only to resolve issues early and effectively but also to foster respectful, long-term relationships that support the sustainability of our operations.

Since its launch in 2012, our Grievance Management System has provided a transparent and participatory platform for community members to voice concerns and receive fair treatment. Based on international best practices, the system ensures both credibility and effectiveness. To reinforce transparency and provide external oversight, it includes an External Grievance Oversight Committee composed of independent community members. This committee meets regularly to assess the grievance management process. Additionally, External Grievance Officers are appointed to receive and address complaints directly at community level, improving both accessibility and responsiveness.

A formal agreement governs our commitment to these stakeholders. In 2024, all committee members renewed their mandate for another three-year term, reaffirming Ambatovy’s long-term dedication to a responsible and transparent grievance management system.

To strengthen the capacity of our grievance officers, four training workshops were held in 2024, benefiting 37 External Grievance Officers. These sessions enhanced their skills in documenting and resolving community concerns. Four additional meetings were held with the External Grievance Monitoring Committee to assess the system's effectiveness and identify areas for improvement. These actions have contributed to growing community confidence in the process.

In 2024, 18 complaints were filed, 72% of which related to livelihood concerns. Over the years, we have observed a steady decline in the number of complaints, reflecting the successful resolution of past grievances, proactive mitigation of potential impacts, and visible actions on the ground. Continued engagement and open dialogue with communities have been essential to this progress.

Each complaint is thoroughly analyzed to determine its validity and relevance. Valid complaints are addressed through detailed action plans, including specific corrective measures. In 2024, one such initiative involved the rehabilitation of 50 rice fields to repair damages. Beyond restoring the fields, the project also created temporary employment opportunities for local workers, further supporting affected communities.

In total, 59 complaints – both current and past – have been resolved through the implementation of agreed corrective actions. These outcomes reflect our commitment to addressing community concerns and promoting local well-being.

This collaborative approach has helped build lasting trust between Ambatovy and the communities in which we operate, while contributing to the long-term sustainability of local resources. Our ongoing efforts to resolve grievances and restore impacted areas demonstrate our strong commitment to community development and meaningful engagement.

The Ambatovy Whistleblower System

Ambatovy's whistleblower system provides employees with a safe and anonymous way to report concerns about fraud, bribery, and corruption, or other misconduct. It is designed to support individuals who may feel uncomfortable speaking

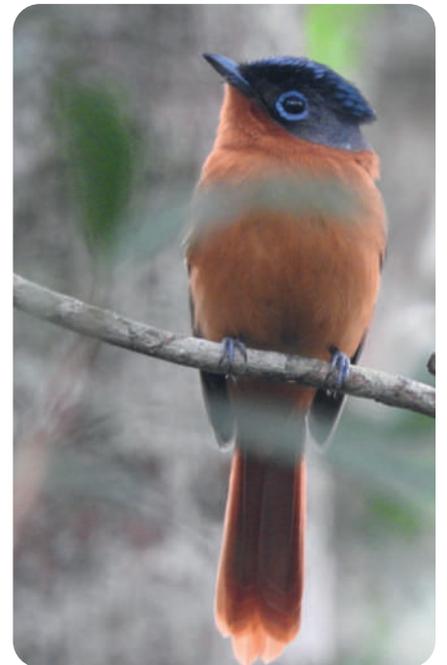
directly with supervisors or senior management. A toll-free hotline is available, and callers can communicate in Malagasy, French or English. Employees may also submit reports online through a dedicated, confidential website.

Every report is carefully investigated to ensure fairness and transparency. The system reflects our ongoing commitment to human rights and to maintaining a healthy and ethical organizational culture. A Compliance Committee is responsible for monitoring compliance with the Code of Conduct and ensuring that effective mechanisms are in place to address ethical concerns. To date, no human rights-related grievances have been reported.



Internal Grievance Mechanism

In addition to our community grievance mechanism and whistleblower system, Ambatovy also has an internal grievance policy managed by the Human Resources Department. This process provides employees with a confidential and accessible channel to raise workplace concerns, including issues related to working conditions, discrimination, or other HR matters. The mechanism ensures that complaints are reviewed and addressed fairly, in line with our commitments to human rights, transparency, and accountability.





Economic Performance

Objectives

- Position Ambatovy among the most successful and sustainable nickel laterite operations in the world, with a real competitive advantage, to secure long-term company sustainability for the benefit of our employees, the country of Madagascar and our shareholders.
- Maximize the economic returns of our operations to local communities, wherever possible.
- Prioritize local procurement and invest in local capacity to enable them to participate in our supply chain.

Approach

Ambatovy recognizes that our presence in Madagascar has had, and will continue to have, considerable economic impacts at the national, regional, and local levels. Our vision is to significantly contribute to Madagascar’s development and maximize the economic return from our operations to local communities. Our decision to refine our products in-country brings important value-added benefits for Madagascar, including the creation of thousands of additional jobs, increased earnings for local communes, regions and the country as a whole, as well as the construction of local infrastructure, to name just a few.

At the national level, since Ambatovy’s exports began in 2012, nickel has become one of Madagascar’s top export products. Export earnings from nickel and cobalt have helped reduce the external current account deficit, maintain the value of the local currency (the Ariary), and build adequate foreign currency reserves. At the local level, significant economic returns have already been realized in the form of salaries, wages, and employment benefits, improved infrastructure, and greater business opportunities.

Recognizing that an operation of this size can generate both positive and negative economic impacts, Ambatovy has implemented proactive programs and mitigation measures to counterbalance any adverse effects. For example, to help control inflation, simplify purchasing procedures, and ensure quality, we source products directly from several farmers’ associations and cooperatives.

We are also committed to improving the capacity of local companies to deliver goods and services that meet international standards, through regular support and training. Moreover, Ambatovy recognizes that with an investment of this size, comes the responsibility to ensure that funds are managed ethically and transparently, and to conduct due diligence to reduce the risk of corruption in all transactions.

Performance



Economic Benefit Footprint

When evaluating the overall economic impact of our presence at national, regional, and local levels, we track our “economic benefit footprint”. This includes payments to the government in the form of taxes, royalties, and fees; the procurement of local goods and services; salaries, wages, and employment benefits through local recruitment efforts; and community investments and donations that go above and beyond our formal obligations and commitments.

Payments to Government

In 2024, Ambatovy paid approximately US \$43.6 million in taxes, royalties, and fees to the Government of Madagascar. This included payments to both Central Government entities and Decentralized Territorial Collectivities, underscoring our long-term commitment to supporting the country’s economic development through responsible fiscal contributions.

Local Procurement

In 2024, Ambatovy spent approximately US \$263.36 million on goods and services from over 400 local suppliers. As part of our commitment to maximizing economic returns to local communities, we have implemented a range of support programs and tools to help local businesses and entrepreneurs meet our procurement and quality standards.

The Ambatovy Local Business Initiative (ALBI), established several years ago, is a cornerstone of this effort and reflects our local procurement policy of “buy locally, hire locally.” We remain firmly dedicated to local sourcing and have consistently prioritized it whenever feasible. Since operations began in 2012, Ambatovy has spent over US \$3 billion on local purchases.

As of the end of 2024, over 5,800 potential vendors had been vetted and registered in our supplier database. During the year, 48% of total procurement was conducted through over 400 local suppliers across 40 different business sectors, including construction, transportation, cleaning and catering services, consumables, and materials. These vendors continue to have access to training modules and mentoring support in key areas such as quality, health and safety, environment, labor regulations and financial analysis. Examples of locally sourced items include pallets and barrels used for shipping nickel and cobalt, uniforms and raincoats for employees, big bags for internal operations, as well as signage and equipment covers for safety purposes.

We also maintain contracts with local service providers in various fields such as construction, repairs, and maintenance. These local suppliers, in turn, generate much-needed employment opportunities. While the exact number of indirect jobs created is difficult to quantify, we estimate that at least 500 jobs have been created through activities such as pallet manufacturing, uniform production, and the recycling of plastic, tires, and wood.

Ambatovy strives to align its recycling efforts with its commitment to supporting local businesses and promoting community development. By combining our economic development and

environmental protection objectives, we have established several partnerships with local associations and NGOs to recycle waste. Key results of these activities in 2024 include:

- 312 m³ of used wood and pallets were transformed into school and office furniture, agricultural tools and other useful items by the Toamasina Cultural and Social Center and the FIMIAM Association in Moramanga.
- 2,118 m³ of plastic waste were processed into pellets by ECO-AID, and STAR (ADONIS).
- 648 m³ of food waste were composted by Arovy Ny Aina and used to grow a variety of fresh fruits and vegetables for school nutrition programs.
- 5 m³ of used cooking oil were converted into domestic soap by the Velontegna Mandroso Association in Toamasina and the Yloaina Association in Moramanga.
- 71,350 tons of fly ash were converted into raw material by αCIMENT.
- 431 metal drums and 88 used tires were recycled by Vonjy Aina.
- 267 m³ of used motor oil and 6,430 used oil filters were recycled by ADONIS and YRR.

As part of our Ambatovy Local Business Initiative (ALBI), Ambatovy has continued to develop a “local-local” supplier base drawn from areas directly affected by our operations (i.e., inside the districts of Toamasina I, Toamasina II, Moramanga, and Brickaville). In 2024, we purchased approximately US \$52 million worth of goods and services from 273 “local-local” suppliers. This included over 25,000 uniforms, 25,000 pallets, and 16,500 metal drums purchased from local manufacturers.

These “local-local” purchase agreements not only create job opportunities and support local economic development, but also contribute to Ambatovy’s broader objective of improved health and well-being among vulnerable populations through social and economic integration as well as sustainable development.



Local Salaries, Wages and Benefits

In 2024, local salaries, wages, and employment benefits for our direct employees totaled US \$36.2 million. This reflects our commitment to supporting the Malagasy population through stable, meaningful employment. Beyond financial compensation, we invest in professional development, safe working conditions, and other employee benefits that contribute to well-being and career growth. These efforts strengthen livelihoods, empower families, and support the broader communities near our operations, demonstrating Ambatovy’s ongoing dedication to sustainable local development.

Community Donations

As part of Ambatovy’s broader sustainability strategy and long-standing commitment to social responsibility, over US \$400,000 was invested in 2024 in targeted initiatives to support vulnerable communities, improve infrastructure, promote safety, and build long-term resilience. These efforts reflect a holistic approach, combining material assistance, training, awareness campaigns, and community involvement.

- US \$50,000 was allocated for food assistance and essential household items for vulnerable households. This included

food packs, kitchen utensils, and refreshments for local gatherings. Beyond meeting nutritional needs, these actions served as platforms for community education on issues such as food security, hygiene, and social inclusion. The approach emphasized dignity, equity, and solidarity, ensuring that no member of the community was left behind.

- US \$50,000 was invested in the modernization of technological and administrative infrastructure. Computers, printers, and other equipment were provided to local institutions to improve operational efficiency and access to digital tools. These upgrades were complemented by community training sessions aimed at enhancing digital literacy and empowering local actors to engage more effectively with public services. The initiative contributed directly to better service delivery, greater transparency, and the empowerment of local governance structures.
- US \$30,000 was used to furnish hospitals, centers for persons with disabilities, children’s facilities, and community guest

houses. This support aimed to create safer, more dignified, and comfortable environments that promote recovery and well-being, especially for those in vulnerable situations.

- US \$270,000 was allocated to address a wide range of community priorities, including school materials, construction tools, and other essential equipment. These contributions were carefully designed not only to improve living standards, education, and infrastructure but also to strengthen community resilience and autonomy. A key component of this investment focused on training and awareness campaigns covering safe construction practices and environmental protection. In parallel, the programs integrated community safety measures, including risk communication activities and sensitization sessions on emergency preparedness and industrial risks. This reflects Ambatovy’s proactive approach to safeguarding communities, reducing vulnerabilities, and building resilience through locally informed and inclusive participation.





Social Investment and Community Engagement

Objectives

- Develop a climate of mutual trust, transparency and open dialogue between Ambatovy and neighboring communities.
- Promote positive and sustainable impacts within communities and contribute to improved living conditions of the local population.
- Mitigate the potential negative impacts on affected populations and their surroundings.

Approach

Today, more than ever, local stakeholders, including community members and civil society organizations, expect to see tangible improvements in their daily lives as a result of natural resource extraction and processing. This is especially true in Madagascar, where socio-economic challenges remain significant. At Ambatovy, we recognize that earning and keeping a solid social license to operate means going beyond compliance. It requires proving that our operations generate real positive outcomes for both local communities and society at large. That is why supporting long-term, meaningful community development is central to our mission.

Our operations inevitably affect the communities where we operate. The way we manage these impacts, whether positive or negative, shapes our relationships with local stakeholders. We believe a transparent, proactive, and well-structured approach to engagement and development helps ensure that our presence brings lasting value without creating dependency. We are committed to striking the right balance between meeting stakeholder expectations and delivering consistent, sustainable results throughout the life of the Mine.

Our ultimate goal is for communities to be better because we are here. We want to be known as a good neighbor: one who listens, collaborates, and helps build opportunities together.

Effective engagement allows us to better understand the needs, concerns, and aspirations of the people around us. It also helps us make informed decisions that align with both community priorities and our own business goals – such as risk management, improving performance, and ensuring sustainable growth. Just as importantly, it lays the foundations for genuine partnerships.

Since large-scale extractive projects are still relatively uncommon in Madagascar, direct, consistent face-to-face communication is key. Regular interaction helps dispel misinformation, ease concerns, and address issues before they escalate. For those that do, communities need a reliable way to raise and resolve concerns. That is why we updated our Grievance Management System in 2023 to align with the UN Guiding Principles on Business and Human Rights (more details can be found in the Governance and Human Rights section of this report).

In 2024, the Social Investment and Community Engagement (SICE) department was restructured into four specialized units, each with a clear and distinct mandate:

- **Social Investment:** Responsible for implementing voluntary programs across three priority areas – Education, Livelihood, and Local Economic Development – and for managing the company’s donations, guided by the Sponsorship and Donation Committee.
- **Community Engagement:** Focuses on stakeholder engagement at the local level, including the prevention, mitigation, and management of impacts, as well as the preservation of cultural heritage.
- **Community Safety:** Oversees initiatives related to community health and safety, emergency preparedness and response, and leads capacity-building efforts through awareness campaigns and simulation exercises.
- **Monitoring, Evaluation, and Compliance:** Ensures adherence to national regulations and the IFC Performance Standards, prepares the organization for audits, and manages the community grievance mechanism.

Performance



Social Investment

Livelihoods

Ambatovy is committed to improving the livelihoods of local communities through targeted interventions that promote economic empowerment, food security, and environmental sustainability. Since the launch of its flagship livelihood initiatives, significant progress has been made in improving household incomes, strengthening agricultural value chains, and building climate resilience in areas affected by the project.

Since 2018, five agricultural cooperatives near the Mine and Tailings Sites have partnered with *Newrest*, supplying a total of 71.28 tons of fruits and vegetables in 2024 alone, generating US \$36,000 in revenue. These partnerships have not only improved rural incomes, but also facilitated market access for over 100 local producers.

To boost agricultural productivity, Ambatovy has provided critical inputs, such as seeds, compost, fertilizers, equipment, and technical training. In 2024, over 185 producers benefited from these inputs, resulting in higher yields and improved farming practices, especially in rice and vegetable cultivation.

To help local businesses grow and reach new markets, Ambatovy supported 13 producers from Toamasina, Brickaville, and Moramanga to showcase their products at FIER Mada 2024, a major agricultural fair. Between 2023 and 2024, Ambatovy distributed 15,000 taro shoots and 20,000 yam cuttings to help rural households diversify food production with fast-growing, climate-resilient crops. Three producer associations located along the pipeline are directly benefiting from these initiatives.

As part of its environmental stewardship efforts, Ambatovy also supported 44 members of community environmental associations (COBA) in launching poultry farming activities by providing 2,000 kg of feed and necessary equipment. In addition, 10 producers were trained in apiculture (beekeeping), and 1,174 nursery seedlings were supplied to support reforestation and agroforestry efforts. These activities promote a balanced approach to ecosystem preservation, and sustainable livelihoods.



Local Economic Development

As part of its commitment to inclusive and sustainable development, Ambatovy is implementing a Local Economic Development Program to stimulate economic growth in the Atsinanana and Alaotra Mangoro regions. This program leverages local assets and opportunities to strengthen key sectors, promote entrepreneurship, and improve youth employability. In 2024, several strategic initiatives delivered tangible results.

The Business Incubation Initiative, launched in 2023, continues to support local entrepreneurship through training, mentoring, and access to financing. Of the 50 participants who began the program, 47 remain actively engaged, having completed foundational training in business management, marketing, accounting, and product development. To date, 26 businesses have successfully formalized their activities, improving their access to markets and growth potential. In 2024, 15 entrepreneurs were selected for the program's second phase, which provides tailored support for business expansion.

The Blue Economy Initiative, implemented in partnership with the Regional Directorate of Fisheries and Blue Economy (DRPEB), aims to strengthen the resilience and incomes of fishing communities, while promoting sustainable practices. Five new savings and loan associations (VSLAs) were created among local fishing groups, bringing the total number of active members to 665. Formalization efforts resulted in the issuance of 399 fisher ID cards and the registration of 249 pirogues. In addition, 28 training sessions covering 10 key topics were conducted to enhance technical, financial, and environmental capacities. To improve productivity and working conditions, 306 fishing tools were distributed to 455 fishers from nine associations.

In Morarano Gare, the ecotourism project continues to promote youth employment and community-based tourism as alternative sources of income. Eleven young guides received French language training, and four are currently undergoing internships with a community-based organization in Andasibe to strengthen their guiding skills. To improve the visitor experience and raise accommodation standards, Ambatovy provided two solar kits, three beds, and additional wooden furniture to local eco-lodges. The initiative contributes both to nature conservation and the development of local livelihoods.

Support for Village Savings and Loan Associations (VSLAs) has also expanded. A total of 46 active groups – each with 15 to 30 members – now operate across the two regions, including six newly established under the Blue Economy program. These groups receive ongoing training and support to improve financial management and ensure sustainability. In 2024, 48 training sessions were delivered across six core modules, equipping members with the skills needed to improve their livelihoods, and foster greater economic independence.

Through these combined efforts, Ambatovy is helping to build more resilient and diversified local economies that support long-term, sustainable development.

More Than a Mine: Supporting Sustainable Development

Ambatovy continued to fund programs aligned with the UN Sustainable Development Goals, including initiatives in health, education, agriculture, and environmental protection. Each project reflects our belief that responsible mining must support the broader development of society.

Education

Ambatovy's commitment to education is rooted in its broader vision of equitable and sustainable human development across local communities. By addressing key barriers to learning such as financial hardship, malnutrition, and limited access to educational resources, Ambatovy's initiatives aim to strengthen student capacity and foster inclusive education systems. These efforts contribute directly to Sustainable Development Goal (SDG) 4: Quality Education for All.

Secondary School Scholarship Program: Since the 2021 - 2022 academic year, Ambatovy has supported access to secondary education for students from the most vulnerable households in its areas of operation. Originally designed to support girls' school retention, the program was later expanded to include boys following requests from parents and local education authorities.

The scholarship program covers school-related expenses over a four-year period, helping to reduce school dropout rates. In 2024, a total of 232 students from Moramanga, Brickaville, and Toamasina benefitted from this initiative, with a total investment of US \$15,600 for the year. This program reflects Ambatovy's commitment to equal opportunities and improved access to education in host communities.

University Excellence Scholarship: To enhance access to higher education, Ambatovy launched a merit-based university scholarship program for outstanding high school graduates in the districts of Moramanga, Brickaville, Toamasina I, and Toamasina II. This initiative supports promising students with the financial resources needed to pursue university-level studies.

Each student receives US \$670 per year, paid in three installments: 34% at the start of the academic year, 40% upon completion of the first semester, and 26% at the end of the academic year. In the 2023 - 2024 academic year, 29 students were selected, with 28 completing the year. For 2024 - 2025, 17 new students joined the program, bringing the total number of beneficiaries to 45. This initiative strengthens local human capital and aligns with long-term sustainability goals.

School Nutrition Program: To help improve student concentration and academic performance, Ambatovy collaborates with regional education and nutrition offices to implement school feeding programs across 18 primary schools in the Atsinanana and Alaotra Mangoro regions. During the 2023 - 2024 school year, the program delivered 172,936 meals

and 69,040 bean-based snacks to primary school children in Toamasina. To support local food production, 190 kg of fertilizer were provided for the development of school gardens at two public primary schools, contributing fresh vegetables for use in school canteens. Additionally, anthropometric evaluations were conducted for 2,610 students to monitor nutritional progress.

In Moramanga, similar actions were implemented. A total of 1,669 children from eight schools received anthropometric follow-up to monitor their growth and health. To improve hygiene and efficiency in meal preparation, kitchen utensil kits were also distributed to participating schools. This initiative contributes to SDG 2 by addressing hunger and malnutrition among school-aged children.

Digital Library: As part of its efforts to modernize education, Ambatovy continued the rollout of its digital library at the Razafindraibe Victorien High School in Moramanga in 2024. This initiative included the installation of nine fully equipped computers and the provision of 25 GB of internet data, giving students access to a wide range of digital educational resources.

A total of 1,512 students now benefit from greater access to information and communication technologies, enhancing their digital literacy and research autonomy. This project helps bridge the digital divide and improve learning outcomes through access to modern tools and educational content.

Adult Literacy Program: Building on a successful pilot in Toamasina in 2023, Ambatovy also launched an adult literacy program in Moramanga in 2024 to improve basic reading, writing, and arithmetic skills among adults living near the mining site. Implemented by the MITIA association, the program targets 172 beneficiaries from surrounding villages and is delivered by 12 trained facilitators. The six-month training is tailored to reflect the everyday realities of participants, focusing on practical skills applicable to rural economic life. Through improved literacy, participants are expected to improve their ability to manage small-scale economic activities and support their children's education. This initiative aligns with SDG 8 by promoting lifelong learning, inclusive economic participation, and greater self-sufficiency.

Vocational Training: In 2024, Ambatovy launched a vocational training program to strengthen local capacity and promote economic development in the communities surrounding its Moramanga mining site. The program targets underprivileged youth, including school dropouts, by providing technical and vocational training opportunities.



In the first phase, 15 young women were enrolled at a tailoring training center in Andasibe. Ambatovy is currently working to identify a woodworking center to train 15 young men, ensuring equal access to skills development. With a total of 30 participants, the program is a key step toward inclusive and sustainable development. By equipping young people with marketable skills and encouraging entrepreneurship, the initiative ultimately contributes to a more resilient and self-reliant local workforce.

From primary school meals to vocational and university scholarships, Ambatovy's education initiatives in 2024 aimed to remove barriers to learning and build stronger foundations for young people. By equipping students and adults with the skills and support that they need, the company is contributing to the emergence of a future workforce that is better prepared, more resilient, and rooted in the communities where it operates.



Social Investment Fund (SIF)

In 2012, Ambatovy, in partnership with the Government of Madagascar, launched the Social Investment Fund (SIF), allocating a total of US \$25 million, to support sustainable social and infrastructure development for local communities. Grounded in inclusive engagement with Malagasy authorities and local stakeholders, the SIF has funded 17 impactful initiatives over the years, all executed in line with Ambatovy's rigorous procurement and compliance standards.



In 2024, the final project scheduled under this phase was successfully completed with the establishment of a state-of-the-art environmental laboratory for the National Office for the Environment (Office National de l'Environnement – ONE) in Toamasina. Following the handover of the permanent facility in 2022, the project was finalized in 2024, with the delivery of specialized laboratory equipment, significantly improving ONE's technical capacity. This milestone marks the completion of the projects previously launched in partnership with the Government to date and reflects Ambatovy's ongoing commitment to environmental stewardship and community resilience.

A comprehensive overview of the 17 SIF-funded projects is provided in Appendix 4.

Community Health and Safety

As responsible neighbors, we are committed to ensuring that our mining activities, transportation operations, and broader business practices do not pose a threat to public well-being. Our approach is grounded in proactive community engagement, regulatory compliance, and continuous risk management.

Our activities align with national legislation and relevant international standards such as the IFC Performance Standards – particularly Performance Standard 4, which addresses community health, safety, and security. These principles guide our long-term efforts to identify, prevent, and mitigate potential risks to the public.

In 2024, we maintained a close dialogue with regional and local authorities, health officials, and community representatives. Through these regular exchanges, we not only increase transparency but also strengthen mutual trust and cooperation. Our objective is to foster a culture of prevention, reinforce local capacity, and remain responsive to evolving community needs relating to public health and safety.

Public Health and Safety

In 2024, Ambatovy continued to implement targeted actions to prevent or mitigate impacts on public health and safety, particularly in communities located near our operations and transport corridors.

Building on the recommendations of our Health Impact Assessment (HIA), we worked with local health authorities to update and refine our community health strategy. Specific areas of focus included communicable disease prevention, road safety awareness, and hygiene promotion. Public health campaigns were carried out in partnership with health professionals and local leaders, often targeting vulnerable groups such as schoolchildren and the elderly.

We also maintained a strong emphasis on water safety, vector control, and sanitation. Where relevant, Ambatovy helps supply materials, technical expertise, or logistical support for local health initiatives.

Emergency preparedness remained a key theme throughout the year. Joint drills and coordination sessions were conducted with local authorities and first responders to test readiness and improve response times. We also supported the strengthening

of local emergency plans and communications systems to better address risks associated with industrial operations or natural events. All these efforts aim to promote a safe, healthy environment where communities can thrive alongside responsible industrial development.

In 2024, we implemented a range of initiatives to strengthen community health and safety across our areas of operation:

- **Medical Mobile Consultations:** Four mobile medical consultations, organized with the Moramanga District Public Health Service, were held in Befotsy, Ampitambe, Berano, and Behontsa. These initiatives provided free medical care to 748 individuals and improved access to healthcare services.
- **Railway Safety Campaign:** In preparation for the railway safety awareness campaign, a survey was conducted to identify individuals with disabilities living along the railway corridor between the Port and the Plant Site. The campaign then targeted these individuals and their families, raising awareness among 40 people with disabilities and 19 families, including 21 members with mental health conditions, about railway risks. In collaboration with Madarail and the Regional Directorate of Youth and Sports, the 2024 World Level Crossing Awareness Day reached 2,472 people. Maintenance work was also carried out on the pedestrian bridge near Jovena station, and meetings were held between Madarail, Ambatovy, and SINOHYDRO to improve safety at level crossings.
- **Overhead Power Line Risk Reduction:** To address risks associated with overhead power lines, we conducted door-to-door awareness sessions with 52 households and a nearby school of 263 students. Following technical inspections, we replaced deteriorated electrical poles and cleared access routes and vegetation ahead of the cyclone season.
- **Tailings Facility Area Safety:** We engaged with 13 surrounding villages to raise awareness of vandalism risks and community responsibilities. Additional safety measures included vegetation clearing, infrastructure protection, and targeted campaigns on road safety and bushfire prevention.
- **Road Safety in Moramanga and Toamasina:** We supported the training of 215 new tricycle drivers and reached more than 10,000 students through school sensitization programs. In partnership with local authorities, we contributed to urban road safety improvements, including convoy coordination, traffic control, and pedestrian safety measures.

HIV/AIDS

While Madagascar continues to maintain a relatively low national HIV prevalence – estimated at under 1% among adults – underlying structural challenges persist. Limited access to healthcare, high rates of other sexually transmitted infections (STIs), and social vulnerabilities create conditions that heighten the risk of HIV transmission. Recognizing these factors, Ambatovy places HIV/AIDS and STI prevention at the core of its health and social responsibility agenda.

Our strategy proactively addresses the potential social and cultural impacts of our operations, particularly the spread of communicable diseases. In line with national public health priorities and the global “three zeros” vision – zero new infections, zero discrimination, and zero AIDS-related deaths –

Ambatovy actively supports and reinforces local efforts to maintain Madagascar’s low HIV/AIDS prevalence through sustained, evidence-based action.

Our HIV/AIDS prevention program adopts a comprehensive and collaborative approach. We work closely with District Health Services (SDSP) in Moramanga, Brickaville, and Toamasina, as well as with the Ministry of Public Health, the National AIDS Committee (CNLS), civil society, youth groups, and international stakeholders, to implement health initiatives that benefit both employees and neighboring communities.

In 2024, Ambatovy’s awareness and testing campaigns reached 12,978 individuals, resulting in 1,285 voluntary HIV tests. These efforts contribute to the objectives of Sustainable Development Goal 3: Ensure healthy lives and promote well-being for all at all ages.

In Moramanga, mobile medical teams visited five villages near the Mine Site, reaching 1,604 people with HIV awareness and prevention messages. During these visits, 2,592 condoms were distributed, and 301 individuals opted for voluntary testing. Likewise, in Brickaville similar campaigns were held in high-traffic communes such as Antsampanana, Ranomafana, and Ampasimbe reaching 6,250 people, and testing 245 individuals. By focusing on areas with increased vulnerability, the initiative ensured meaningful engagement with at-risk populations through culturally appropriate approaches.

Beyond community outreach, Ambatovy also championed awareness within the workplace. In collaboration with health authorities, World AIDS Day events were held at our industrial sites in Toamasina, Brickaville, and Moramanga. These efforts reached 3,024 employees, including subcontractors, and resulted in 516 voluntary tests. In Ampasimbe, 2,100 community members were engaged, and 223 individuals chose to be tested. These results reflect Ambatovy’s integrated health promotion model that connects workplace safety with community well-being.

A cornerstone of our strategy is the empowerment of peer educators; trusted individuals trained to lead by example and encourage behavior change. In Moramanga, 30 peer educators completed two capacity-building sessions on HIV prevention, community engagement, and effective health communication. Similarly, in Brickaville, 15 peer educators received specialized training to expand outreach through both mass sensitization and one-on-one interventions.

These peer educators are now equipped to deliver accurate information, challenge stigma, and foster lasting behavior change in their communities. Their role is vital to ensuring our health messages are not only heard but also trusted and acted upon.

Through these comprehensive programs, Ambatovy demonstrates a sustained and strategic commitment to advancing public health, strengthening community resilience, and creating inclusive, safe environments for all. By partnering with public health institutions and investing in grassroots leadership, we amplify the long-term impact of our interventions. Health is a foundational pillar of sustainable development. Through education, voluntary testing, and prevention, Ambatovy is building more informed, empowered, and resilient communities, creating lasting value for people and the broader ecosystem.

Emergency Preparedness and Response

Ensuring the safety of nearby communities and operational sites remains a top priority. Robust emergency preparedness and response plans are developed based on detailed scenario analyses and risk assessments and actively implemented. These plans are designed to protect people, the environment, and critical infrastructure during major incidents. Proactive measures are continually taken to minimize the severity of potential impacts. Close coordination with both internal and external emergency response teams ensures efficient and unified action during crises, with regular joint training exercises to maintain a high level of readiness.

This approach aligns with international best practices, including IFC Performance Standard 4 and the United Nations' APELL (Awareness and Prevention of Emergencies at the Local Level) framework. Such alignment demonstrates a commitment to proactive preparedness, collaborative engagement, and adherence to global safety standards; reinforcing Ambatovy's dedication to community protection and operational resilience.

Emergency communication systems have been upgraded to strengthen industrial risk awareness and preparedness in communities near facilities in Toamasina and Moramanga. A new toll-free emergency hotline (939), now accessible on all national mobile networks, replaced the previous provider-specific number, significantly improving community access to emergency services. This improvement was formally approved by the national telecommunications authority (ARTEC).

In the Madarail area, located along a high-risk ammonia pipeline zone, the existing manual emergency siren presents operational challenges. To address this, a remote radio-controlled activation system is being developed. Preliminary tests have been conducted, with technical refinements planned before full implementation.

Under a Memorandum of Understanding (MoU) with the National Office of Disaster Risk Management (BNGRC), planning sessions identified the need for a local emergency preparedness workshop based on the UNEP APELL methodology. BNGRC also requested assistance in equipping its territorial office in Toamasina and the Emergency Operations Coordination Center in Moramanga. A formal request was recommended to initiate this support process.

Ambatovy actively participated in the national Simulation Exercise (SIMEX) led by BNGRC in Toamasina, simulating a combined cyclone and flooding event. An additional scenario involving overflow at the Tailings Facility spillway was proposed. Supervised by the United Nations Office for Disaster Risk Reduction (UNDRR), the exercise included participants from Mauritius, Seychelles, Comoros, and the SIMA Foundation. Ambatovy activated its internal emergency protocols and helped coordinate private sector humanitarian aid.

Ambatovy also participated in the Regional Forum on climate outlooks for the hot and rainy season in the Atsinanana region. Essential cyclone preparedness equipment – including megaphones, water tanks, fluorescent vests, life jackets, and whistles – was distributed to four municipalities with



contingency plans developed in collaboration with Ambatovy. These initiatives strengthen community resilience and ensure a rapid response to cyclones.

A separate MoU with the 4th Civil Protection Unit establishes quarterly joint emergency drills and mutual aid agreements, further strengthening institutional coordination and response capacity.

Next to our Tailings Management Facility, thirteen damaged evacuation signs were repaired, and two planning sessions were held to update evacuation procedures. A new 52-meter flood elevation model was integrated, redefining hazard zones and assembly points. Upcoming initiatives include assessing the accessibility of safe zones, updating household registries, and running public awareness campaigns.

In partnership with local education authorities, BNGRC, CRGRC, and NGO Vohimanana, evacuation drills were conducted in 36 schools along the ammonia pipeline corridor from the Port to the Plant. These drills involved 9,632 participants – 9,338 students and 294 teachers. Stakeholders recommended annual drills and suggested including faith-based schools in collaboration with DIDEC.

The Emergency Response Plan (PPI) for Toamasina Prefecture was updated, validated in a joint workshop with CRGRC and BNGRC, and officially approved by the Prefect, reinforcing local emergency management structures.

In Moramanga, a parallel process resulted in the finalization and approval of the district's PPI following validation by the District Disaster and Risk Management Committee (CDGRC) and BNGRC. The updated plan incorporates improved prevention measures, alert systems, and inter-agency coordination to boost community resilience.

NGO Vohimanana also shared findings from a door-to-door campaign on gas leak prevention and safety practices in communities along the pipeline corridor. A population census within a 2.2 km radius of the Plant Site identified 6,354 residents across 1,598 households, including 826 children under five, 127 elderly people, and 105 persons with disabilities. Three

ammonia risk awareness billboards between the Port and Plant areas were updated to prominently display the new 939 emergency hotline.

At the Mine Site, a comprehensive awareness campaign focused on dam break risks was conducted. This initiative produced a detailed map covering 329 villages and designated 101 high-ground assembly points.

Community Engagement

Resettlement – Vohitrambato

During the early construction phase, communities living near the Tailings Management Facility (TMF) and the Plant Site were relocated in accordance with international and national resettlement standards. Between December 2007 and February 2008, 261 households were resettled in two newly established villages, Vohitrambato and Marovato. These communities were provided with housing and essential infrastructure, including water points and a school, to restore livelihoods and support long-term well-being.

While the physical relocation process was completed over a decade ago, Ambatovy has maintained an ongoing commitment to supporting the resettled communities. For over 15 years, a comprehensive resettlement program has been implemented in line with the World Bank’s involuntary resettlement principles, the International Finance Corporation (IFC) Resettlement Action Plan (RAP) guidelines, and national standards. The approach has focused on promoting self-reliance through local empowerment and sustainable development.

Resettled communities have benefited from a range of livelihood support initiatives, including vegetable gardening, handicrafts, and small-scale animal husbandry. Complementary programs have addressed community health, hygiene, education, and sustainable forestry. These efforts have been successful thanks to the active involvement of the community, which have taken the lead in driving its own development.

In recent years, additional investments have gone into improving living conditions and strengthening community resilience. A standout example is the rehabilitation of the road connecting Vohitrambato to National Route 2 (RN2), an important route for local transportation, economic activity, and ecotourism. This work, implemented in collaboration with the suburban municipality of Toamasina and the Ampihaonana fokontany, targeted the worst sections of the road. Beyond improving infrastructure, this initiative provided 1,507 hours of temporary employment for local workers, bringing income and supporting local economic development.

Healthcare support remains a key pillar. A quarterly reimbursement program for medical expenses has facilitated access to essential treatment for 17 vulnerable individuals in Vohitrambato. By removing financial barriers to care, this initiative contributes to social inclusion and safeguards public health.

Access to clean water also remains a priority. The second phase of the Sahavahy gravity-fed water system rehabilitation was completed, resulting in the installation of 24 public standpipes

serving 271 households across 21 hamlets. To help ensure the system’s long-term sustainability, a water users’ association (ASUREP) was established to collaborate with the operator. Together, with community input, they agreed on a household water fee of 4,000 Ariary – striking a balance between covering operational costs and keeping access affordable.

Together, these efforts address both immediate community needs and broader development objectives, such as economic empowerment, participatory governance, and environmental stewardship. Strong partnerships with local authorities and community-based structures have reinforced institutional capacity and fostered a shared sense of responsibility.

These long-standing initiatives reflect Ambatovy’s enduring commitment to responsible resettlement and inclusive development. They demonstrate a holistic approach that aligns with global sustainability frameworks, including the United Nations Sustainable Development Goals (SDGs) and the IFC Performance Standards, and contribute to building resilient, inclusive, and self-sustaining communities.

Communities near the TMF

In 2024, Ambatovy reached an important milestone in its social compliance commitments with the successful relocation of the last four remaining families living in the “no-go” zone of the Tailings Management Facility (TMF). This was one of the most sensitive and complex resettlement challenges within the project footprint.

After years of constructive dialogue and careful planning, the families – guided by a respected community elder – were relocated to sites of their choice. This process fully respected the company’s formal resettlement agreements and was carefully managed to honor local customs, family dynamics, and land rights.

As part of their relocation, each family received a newly built house with proper sanitation facilities that meet health and safety standards. Two traditional family tombs – maternal and paternal – were also built and formally handed over, in recognition of the cultural importance of ancestral burial sites. Each phase of the relocation was marked by traditional ceremonies, including the slaughtering of four zebus, symbolizing cultural continuity and respect for local rites.



To ensure that livelihoods were not disrupted, each household received replacement land of similar size and quality to their previous holdings within the TMF. Community consultations were held throughout the process to ensure mutual understanding and local ownership.

With the final relocation now complete, Ambatovy has met all its resettlement obligations in the TMF area, marking a key milestone in its social responsibility efforts. The process was shaped by respect for culture, fairness, and ongoing dialogue with the communities involved – principles that align with the IFC Performance Standards, including free, prior and informed consent (FPIC), the World Bank Environmental and Social Framework, and national regulations. This careful and transparent approach highlights Ambatovy’s dedication to sustainable development and building lasting, trust-based relationships with nearby communities.

Ambolomaro

In 2008, Ambatovy launched an “economic resettlement” program for 29 families in Ambolomaro, near the Mine Site. Although their homes were outside the official Mine lease boundary, their rice fields were inside it, requiring the relocation of their farming activities. To address this, Ambatovy provided access to alternative farming sites and ongoing technical support, which over time led to improved rice yields for these farmers. After a temporary suspension due to the COVID-19 pandemic, activities in the area resumed in 2022.

In 2024, Ambatovy reinforced its commitment to sustainable farming and soil fertility in Ambolomaro. Under the technical guidance of the Regional Directorate of Agriculture and Livestock (DRAE) of Alaotra Mangoro, Ambatovy provided improved agricultural inputs and hired local labor to assist with land preparation during both the 2023–2024 main season and the 2024 off-season. This work was carried out in close coordination with a network of highly motivated smallholder farmers organized into seven local associations: MIRAY, VONONA, MIAVOTRA, EZAKA, MIARAMIJORO, TSINJO, and TIANTSOA.

A total of 54 farmers cultivated 32 hectares under the technical supervision of CIRAE/DRAE experts. Despite seasonal flooding, 31.37 hectares were successfully planted, with average rice yields reaching 2.18 tons per hectare – a testament to both farmer dedication and effective agronomic support.

A notable innovation in 2024 was the expansion of off-season cropping to boost soil fertility through crop rotation. With support from Ambatovy, farmers applied organic fertilizers and selected seeds suited to local agro-climatic conditions. During the off-season, 35 farmers cultivated 434 kilograms of beans on 3.7 hectares, applying 55 cubic meters of manure to enrich the soil.

One of the year’s greatest achievements was the rehabilitation of 9.5 kilometers of irrigation and drainage canals, improving water distribution across all rice fields in the area. With technical assistance from DRAE, this upgrade significantly improved water management and agricultural productivity.

To ensure long-term sustainability, training sessions were held for members of the local Water User Association (AUE), focusing on canal maintenance and water governance. These sessions equipped farmers with the knowledge and skills

needed to manage their irrigation systems autonomously and effectively.

Community Dialogue

At Ambatovy, community engagement is central to how we operate responsibly and sustainably. We prioritize open, transparent, and respectful dialogue with local communities to build trust and support inclusive, well-informed decision-making. Through this engagement, we aim to respond to local concerns, uphold our commitments, and reinforce our social license to operate.

In 2024, Ambatovy continued to conduct extensive awareness campaigns on issues of shared concern and importance to our stakeholders. These campaigns covered a broad range of themes including, child protection, road and rail safety, cyclone preparedness, environmental protection, mining operations, dam risk mitigation, illegal mining, security, community health and safety, and HIV/AIDS awareness. Additionally, we promoted community development initiatives that contribute to long-term well-being and resilience.

Ambatovy maintained its strong partnerships with local authorities, traditional leaders, local associations, women’s groups, and civil society organizations. This collaborative approach resulted in 1,741 formal interactions being recorded through our Stakeholder Engagement Plan, equally reaching local authorities and communities across our Mine, Pipeline, and Plant Site areas.

Cultural Heritage

Ambatovy’s commitment to sustainable development includes the protection and promotion of local culture, identity, and heritage. We recognize the value of Madagascar’s rich cultural and historical legacy and take active steps to ensure it is respected, preserved, and shared.

Through our archaeology and ethnology program, we protect cultural heritage sites, artifacts discovered within our operational footprint between Moramanga and Toamasina. In addition, archaeological surveys and ethnological studies are carried out in parallel to document traditions, rituals, and cultural narratives of local communities.

The archaeological museum, inaugurated in 2020, continues to serve as a repository and educational platform, housing more than 1,800 objects unearthed during our operations. We remain committed to making heritage accessible and valued – not only for its historical importance but also for the sense of identity and continuity it provides to future generations.

Monitoring, Evaluation and Social Compliance

The Monitoring, Evaluation, and Compliance Unit plays a key role in making sure Ambatovy’s social investments, community obligations and development efforts are implemented in line with applicable standards, norms, and regulatory frameworks. Its main goal is to maximize the impact of these initiatives, use resources wisely, and respond to community feedback and concerns promptly and effectively.

By regularly assessing performance, the unit provides evidence-based updates on how programs are working and the results they are delivering. This supports transparency, enhances accountability, and helps build trust with communities, local authorities, and shareholders. Rigorous monitoring and evaluation practices are essential for staying aligned with expectations and maintaining open and constructive dialogue.

The unit also oversees compliance, ensuring that all activities adhere to local, national, and international regulatory frameworks, such as the IFC Performance Standards and the UN Guiding Principles on Business and Human Rights. Staying compliant protects Ambatovy's reputation, reduces risks, and helps maintain its social license to operate. By spotting problems early through clear indicators, the team can intervene before issues escalate and continue improving processes.

In parallel, the unit plays a critical role in data consolidation and analysis, drawing from multiple sources to generate insights on the effectiveness, efficiency, and relevance of social initiatives. These insights help the SICE department refine strategies,

adjust programs when needed, and keep efforts in line with community needs and evolving development priorities.

Proactive social risk monitoring enables the unit to anticipate and mitigate potential negative impacts associated with mining operations. Keeping an eye on potential challenges means the unit can ensure appropriate protective measures are integrated into project planning and implementation. This approach reinforces the sustainability and resilience of company-community relations.

To support strong, results-driven operations, the unit monitors a range of key performance and compliance indicators, including:

- **Community Impact:** Tracks improvements in livelihoods, education access, health outcomes, and local economic development to measure tangible benefits for host communities.
- **Initiative Effectiveness:** Assesses the relevance and success of programs through surveys, beneficiary interviews, and participatory feedback mechanisms, ensuring initiatives remain responsive to real needs.
- **Grievance Management:** Reviews the performance of complaint-handling mechanisms to ensure grievances are received, processed, and resolved transparently, fairly, and without reprisals.
- **Regulatory Compliance:** Monitors adherence to legal obligations and international standards, to reduce regulatory risks and align operations with global expectations for responsible business.

Through this integrated approach, the Monitoring, Evaluation, and Compliance Unit helps ensure Ambatovy's social commitments are not only fulfilled but delivered with integrity, efficiency, and measurable results. Its work is fundamental to driving inclusive development, maintaining corporate accountability, and building sustainable relationships with host communities.





Environment

Objectives

- Achieve no net loss in biodiversity, throughout our impacted sites.
- Support and empower local communities to reduce pressure on conservation areas.
- Manage waste, emissions and water to minimize Ambatovy’s overall environmental impact and footprint.
- Reduce our carbon footprint.

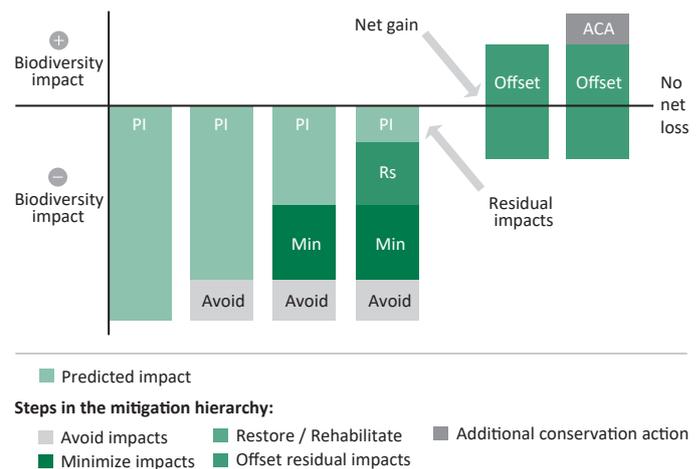
Approach: Biodiversity

Ambatovy’s primary goal is to minimize environmental impacts wherever possible and to reduce the effects of its mining operations on Madagascar’s unique environment. Specifically, the company aims to achieve no net loss (NNL) of biodiversity through a comprehensive approach that includes avoidance, risk minimization, timely restoration of sustainable landscapes, and offsetting residual impacts. The main biodiversity impacts result from forest clearing at the Mine, which spans 1,614 ha. Prior to construction, the forests in this area were already under significant pressure from human activities, including agricultural clearing, illegal timber harvesting, and hunting. Meanwhile, the Plant and Tailings Sites were intentionally located on degraded coastal scrubland, which hosts comparatively low biodiversity. The impacts across all sites have been carefully considered in the development of a comprehensive biodiversity program designed to address environmental effects at every stage of Ambatovy’s operations. The program is guided by the following core objectives:

- Achieving no net loss of biodiversity.
- Preventing species loss and maintaining or increasing the population of endangered species.
- Minimizing impacts on flora, fauna, and aquatic resources.
- Enhancing the conservation of critical habitats.
- Ensuring the viability of priority habitats by maintaining or improving ecosystem connectivity.
- Integrating biodiversity activities with regional biodiversity initiatives.

To achieve these objectives, Ambatovy follows the mitigation hierarchy outlined in the IFC Performance Standard 6 and adheres to the principles of the Business and Biodiversity Offsets Program (BBOP). This approach involves: avoiding impacts where possible, minimizing unavoidable impacts, restoring or

The Mitigation Hierarchy



Source: “Working towards NNL of Biodiversity and Beyond: Ambatovy, Madagascar – A Case Study (2014)”, by Forest Trends and Ambatovy, p. 23.

repairing any damage, and providing offsets for residual impacts (e.g., through the conservation and protection of ecologically comparable areas). Additional conservation efforts may be implemented to further compensate for biodiversity impacts.

In line with IFC Performance Standard 6 and BBOP guidance, Ambatovy has developed a comprehensive offset program, consisting of several conservation sites and associated activities.

This program is necessary due to the large scale of our operations, which impact sensitive, high-biodiversity areas. In addition to “like for like” habitat offsets, Ambatovy is also evaluating the need to designate additional offset areas, particularly for the conservation of the Golden Mantella and certain endemic fish species. The company’s current offset sites include the Mine Conservation Forests, the Analamay-Mantadia Forest Corridor (CFAM), the Ankerana Forest, and

the Torotorofotsy Wetlands Ramsar Site. Together, these sites protect nearly 14,000 hectares of forested land, approximately nine times the area impacted by our mining activities. Further details about the offset program, including offset site descriptions, can be found on the Ambatovy website.

Adhering to these standards has resulted in a comprehensive approach to managing our impacts, including those that pre-date our involvement, through collaboration with local communities, the Government of Madagascar, and other conservation and development NGOs. The program focuses on several key areas, including flora, fauna, and aquatic and marine ecosystems. Each area has specific actions for the construction, operations, and mine closure phases. Additionally, we have developed detailed management plans for the Mine, Pipeline, Plant, Tailings, and Port facilities, all of which integrate biodiversity considerations. There is also an overarching Biodiversity Management System that governs all our biodiversity programs.

Our biodiversity program is managed under the framework of the Ambatovy Environmental Management System (AEMS), a quality assurance and quality control (QAQC) system aligned with ISO 14001 principles to meet IFC good practice standards. The biodiversity program at the Mine continues to align with the AEMS, ensuring that our operations adhere to the highest environmental management standards.

The AEMS system includes 20 management plans that cover the entire Ambatovy environmental program, addressing each category of fauna and flora identified in our areas of operation. The objective of our biodiversity program is to ensure the continued viability of fauna and flora populations in Ambatovy's areas of operations. For fauna, this involves pre-clearing inventories, as well as the rescue and relocation of animals from mining areas to our conservation zones. Our fauna programs focus on five key groups: lemurs, micro-mammals, birds, fish, and amphibians and reptiles. Each group has its own set of management plans and standard operating procedures (SOPs), all based on the principle of adaptive management. Species classified as endangered or critically endangered on the IUCN Red List are identified as Species of Concern (SOCs) and are subject to specific management actions.

Performance: Biodiversity



For all our biodiversity impacts and interventions, specific biodiversity goals have been established to ensure we achieve our vision of operating a sustainable and responsible business in Madagascar. These goals, along with associated key performance indicators (KPIs), are periodically assessed and adjusted based on consultations and data collected through our monitoring programs. The KPIs are aligned with the requirements of Madagascar's regulator, ONE, as well as with international standards, including the IFC Performance Standards on Environmental and Social Sustainability (IFC 2012 version) and the BBOP standard.

Lemur and Small Mammal Management

The Ambatovy-Analamay forest complex is home to 11 lemur species, each with different IUCN conservation statuses. Two species are classified as Critically Endangered (CR) according to

the IUCN: *Indri indri* and *Propithecus diadema*. Two species are listed as Endangered (EN): *Daubentonia madagascariensis* and *Allocebus trichotis*. The remaining seven species are considered Vulnerable (VU): *Hapalemur griseus*, *Eulemur rubriventer*, *Avahi laniger*, *Cheirogaleus crossleyi*, *Microcebus lehilahytsara*, *Lepilemur mustelinus*, and *Eulemur fulvus*.

In 2024, 12 individuals from three lemur species were safely rescued from the clearing area, thanks to Ambatovy's mitigation methods. These included three *Indri indri*, seven *Propithecus diadema*, and two *Avahi laniger*. Additionally, manual lemur salvaging and translocation activities were conducted during the year, resulting in the successful relocation of two *Propithecus diadema* (rescued from the road) and one *Microcebus lehilahytsara* (from existing Mine site infrastructure) to conservation zones.

Radio-collar monitoring continued in 2024 across four lemur groups (one *Indri indri* group and three *Propithecus diadema* groups), demonstrating stability in both group size and territorial range.



Flora Management

Ambatovy continues to advance research aimed at conserving viable populations of Critically Endangered (CR) and Endangered (EN) plant species within the Mine's conservation forests and other protected areas in Madagascar. The goal is to gradually reduce reliance on ex-situ conservation methods by strengthening in-situ strategies and habitat protection. In 2024, Ambatovy inventoried a total of 3,579 individuals from 22 priority plant species within the clearing areas. Additionally, 577 orchids from 96 species were salvaged, including *Bulbophyllum* sp. 24 *aff. Sandrangatense* (a newly identified species), 19 endangered species, and 77 common species.

By the end of 2024, 7,959 orchids were growing in Ambatovy's shade houses, with more than 90% surviving and adapting well throughout the year.

Manual pollination was performed on 241 individual plants representing 57 species, including one CR, 18 EN, and two newly identified species. An additional 165 individuals underwent auto-pollination. Orchid seeds from 146 individuals across 46 species were successfully preserved in 205 conservation tubes.

The 2024 orchid park inventory recorded 4,297 individuals. The transfer of 847 non-threatened orchids achieved a viability rate of 93.6%. A first test translocation of 20 individuals to a rehabilitation area yielded a viability rate of 60%. Insights gained from this pilot effort will inform the development of long-term orchid translocation strategy.



Invasive species control

Ambatovy is committed to protecting and promoting at-risk species by actively managing invasive species that pose a threat to biodiversity in both aquatic and terrestrial habitats, as well as in surrounding communities. Our fauna control efforts prioritize targeted campaigns to eradicate key invasive species, including the Louisiana crayfish, Asian toad, and three species of exotic rats.

For invasive plant species, targeted removal efforts are carried out to eliminate species such as *Lantana camara*, *Eucalyptus robusta*, and *Rubus moluccanus*. These cleared areas are then restored with indigenous plant species to promote the natural regeneration of local biodiversity.

In 2024, a key action at the Mine Site involved the control of stray dogs, which represent a threat to native wildlife and employee safety. In December, we conducted a session of ethical euthanasia, removing 36 stray dogs from the area. This intervention significantly reduced predation pressure on native fauna and mitigated associated health risks for personnel. Looking ahead, Ambatovy is exploring sustainable alternative solutions for dog management, aiming to eliminate the need for euthanasia in future interventions.

Fish

Ambatovy is committed to preserving aquatic biodiversity through proactive conservation measures and the management of invasive species. Within the Ambatovy-Analamay forest complex, we have identified 16 fish species across 9 families, including 6 local endemic species, 3 native species, and 7 exotic species. Notably, five of the endemic species are potentially new to science and have been designated as priority species due to their small populations and vulnerability.

To protect these species, Ambatovy conducts regular risk assessments, water quality monitoring, and targeted invasive species eradication. In 2024, key conservation efforts included:

Rescue and Relocation

A total of 147 *Ratsirakia* sp. and 39 *Rheocles* sp. were salvaged from a dam-impacted area (AN-NWRCP) and relocated to two release sites within the Ankanja River Conservation Zone.

Invasive Species Eradication and Habitat Restoration

Eighty-one river sections were cleared of invasive fish species, including *Coptodon zillii*, *Xiphophorus maculatus* and *Channa maculata*. Following the clearing, endemic species were reintroduced to restore ecological balance:

- 159 *Rheocles* sp.
- 3,603 *Ratsirakia* sp.
- 9 *Anguilla mossambica*.
- 4 *Awaous macrorynchus*.

Ecosystem Health Monitoring

We conducted assessments at 19 sites using the Global Normalization Biological Indicator (GNBI), which evaluated aquatic ecosystem health based on macro-invertebrate communities. Results showed:

- 9 sites rated as good
- 8 sites rated as medium
- 2 sites rated as low

While there was a slight decrease in high-quality sites compared to 2023, monitoring and restoration efforts continue.

Offset Feasibility Studies

Ambatovy is exploring an offset program for *Ratsirakia* sp. and *Rheocles* sp. Feasibility studies are ongoing to evaluate the technical, ecological, financial, and socio-economic viability of this initiative to ensure long-term conservation outcomes.

Ambatovy remains dedicated to the protection and restoration of Madagascar's aquatic ecosystems by:

- Updating the Aquatic Management Plan to reflect evolving conservation priorities
- Maintaining exotic species barriers at key river sites
- Strengthening invasive species eradication within the mining area to safeguard native habitats.

These initiatives highlight Ambatovy's ongoing efforts to balance operational needs with the preservation of aquatic biodiversity.



Amphibians and Reptiles

Ambatovy's areas are home to 92 species of amphibians and 69 species of reptiles. Within the Mine footprint, 12 species (nine amphibian species and three reptile species) have been identified as requiring specific mitigation efforts due to their IUCN status. These include one Critically Endangered (CR) species and 11 Endangered (EN) species.

Since 2007, rescue efforts have contributed to enhancing scientific knowledge of Madagascar's amphibian and reptile populations, particularly those at risk. As forest clearing continues within the Mine footprint, rescue and translocation activities continue to be a priority. Ecological monitoring is also carried out to assess reptile population densities and trends across conservation areas and release zones.

The Golden Mantella frog (*Mantella aurantiaca*) is one of Ambatovy's flagship species. To ensure its long-term conservation, Ambatovy has implemented a three-pronged approach that includes:

- Manual rescues from clearing zones,
- Monitoring of conservation ponds, and
- Captive breeding for release into natural marshes.

This program is conducted in collaboration with the Mitsinjo Association, EcoFauna, the Ministry of Environment and the IUCN's Amphibian Specialist Group. It encompasses breeding activities, monitoring, manual rescue, and physical inventories.

In 2024:

- A total of 9 *Mantella aurantiaca* and 10 *Mantella crocea* were auto salvaged from clearing areas.
- An additional 16 *Mantella aurantiaca* and 1 *Mantella crocea* were manually relocated from three spawning marshes affected by land clearing.
- Population monitoring recorded 188 *Mantella aurantiaca* and 408 *Mantella crocea* in the conservation zone, indicating stable populations in these protected areas.

To reinforce wild populations, 313 juvenile *Mantella aurantiaca* bred in captivity were released into three receiving marshes. Monitoring across 16 receiving marshes confirmed species viability, reproductive success, and adaptation in these habitats.

For reptiles, 462 individuals from 18 species were salvaged from clearing zones, with 15% identified as *Phelsuma quadriocellata* and *Phelsuma lineata*. Additionally, a two-year herpetological study concluded in 2024 successfully confirmed the presence of two of the three priority reptile species: *Boophis boehmei* and *Cophyla mavomavo*.



Offsets

In 2024, Ambatovy strengthened its conservation efforts across four offsite locations: the Conservation Zone, CFAM, Torotorofotsy, and Ankerana. A total of 624 illegal activities were recorded, primarily related to logging, along with incidents of charcoal production, forest fires, and land clearing. To reinforce forest protection, local community associations (COBAs) were further engaged in patrolling activities, playing a vital role in monitoring and reporting threats to biodiversity.

Government support also played an important role. A regional workshop led by the Regional Director of the Ministry of Environment in Ambatondrazaka resulted in the decision to mobilize all available workforces at both regional and local levels to strengthen forest conservation enforcement.

Throughout the year, 24 COBA coaching sessions were conducted, and 145 patrols were conducted across key conservation areas. COBAs also contributed to natural resource management by handling wood authorization requests and enforcing penalties for illegal activities, resulting in 20 fines paid for illegal activities. Income-generating initiatives further supported community livelihoods, such as poultry farming, which generated an average income of 56,748 Ar per beneficiary, and seedling sales for Ambatovy's rehabilitation program.

At Ankerana, 144 patrols were conducted, recording 241 threat cases, a 23% reduction compared to 2023. Restoration activities covered 13,627 hectares, and the four COBAs successfully implemented all recommended actions. Community support included agricultural training and seed distribution for 196 beneficiaries, as well as cash crop assistance for 253 beneficiaries.

In Torotorofotsy, patrols in 2024 also noted a decrease in certain illegal activities, such as tree cutting and gold panning, although pressures like forest fires, logging, and charcoal production remain. Collaboration with three COBAs promoted sustainable management across 1,018 hectares. Livelihood initiatives included poultry farming for 317 beneficiaries and ginger cultivation for 26 beneficiaries. Awareness activities reached 4,545 adults, complemented by environmental education programs in five local schools.

Ambatovy remains committed to balancing community needs with biodiversity protection by continuously improving conservation strategies and empowering local communities to become long-term stewards of their environment.



Scientific Consultative Committee (SCC)

Established in 2009, the Scientific Consultative Committee (SCC) integrates international conservation expertise into our environmental program and ensures transparency. Comprising independent national and international scientists with expertise in biodiversity, conservation, and environmental management, the Committee meets biennially to review our environmental and social programs, providing impartial advice and key recommendations.

In 2024, after more than 15 years of collaboration, Ambatovy initiated a review of the SCC's membership and scope of work. The objective is to align the Committee's support with the evolving context of environmental management within Madagascar's complex biodiversity. This review is expected to strengthen ongoing efforts and help define future areas of focus.

Restoration to a Sustainable Landscape

The rehabilitation of disturbed areas is a key component of Ambatovy's commitment to biodiversity. The rehabilitation plan for 2022 - 2027 targets 100 hectares of revegetation, with a margin of +/- 10%.

In 2024, a total of 23.86 hectares was restored using native plant species, and 0.19 hectares were restored through hydroseeding, bringing the cumulative total to 216.10 hectares since 2007. This includes 96.02 hectares through ecological restoration and 120.08 hectares through hydroseeding.

A total of 1,333 kg of seeds was collected from 62 species, 46 genera, and 30 plant families. These efforts were supported by partners such as the *Silo National des Graines Forestières* and Conservation International. The collected seeds are used in ongoing restoration and revegetation activities, including the planting of native flora in disturbed areas.

In 2024, a high-diversity, high-density planting strategy (planting to maturity) was successfully demonstrated using the collected seeds. The nursery held a stock of 367,368 viable plants covering 225 species across 150 genera and 75 families.

Since 2011, Ambatovy has been working with grassroots community-based associations (COBAs) to create a green shield around conservation forests and support sustainable resource use near the Mine Site. Recognizing that local populations rely heavily on forests for natural resources, Ambatovy has focused on promoting sustainable income-generating activities to help reduce over-exploitation.

The COBAs have played an active role in rehabilitation efforts by producing fast-growing seedlings, which Ambatovy purchases for restoration activities. In 2024, the sale of 10,000 seedlings generated a total income of 20,000,000 Ar for the COBAs.

Additionally, collaboration between the Social and Environment departments has helped diversify and strengthen the COBAs' livelihoods. In 2024, 378 COBA members received 2,635 kg of seeds (rice, beans, and Bambara peas) through various crop cultivation initiatives. With technical training in improved agricultural practices, they successfully harvested 45,238 kg of crops, generating a 58,708,040 Ar.

Ambatovy also continued to strengthen capacity-building efforts to equip the COBAs with the skills needed to manage the transferred areas effectively.



Ecosystem Services and Forest Conservation Efforts

Ambatovy recognizes the importance of ecosystem services – the benefits that natural ecosystems provide to both the environment and local communities. In line with its sustainability objectives, Ambatovy has prioritized forest conservation and management to preserve and enhance these vital services.

Ambatovy supports the protection and management of 36 hectares of natural forest and 69.5 hectares of forest plantations near the villages of Vohitrambato and Marovato. This includes the Analabe natural forest and the Andravinjaza forest plantation near Vohitrambato, managed by the Fehizoro Federation, as well as the Marovato forest plantation, managed by the Association Marovato Mitambatra Toamasina (AMMT). These forest areas are critical for biodiversity conservation, water regulation and erosion control. They also provide local communities with essential resources such as timber, firewood, and medicinal plants. To ensure long-term sustainability, Ambatovy works closely with local forest management committees to promote best practices in forest stewardship. Initiatives include agroforestry, the development of village nurseries and technical training for improved land use. These efforts contribute to both environmental protection and local economic development.

To further support sustainable forest conservation and community-based initiatives, the Analabe Forest was officially launched as an ecotourism site in March 2024. This milestone followed a year of dedicated efforts, including the creation of an interpretation center, the establishment of an ecotourism circuit, and the development of targeted communication materials.

Analabe covers approximately 22 hectares of natural forest, complemented by an additional 13 hectares of restored forest. The site is of significant biological, social, and cultural importance to the Vohitrambato community. An ecotourism management plan, developed in response to a community request, has been in place since 2019. Ambatovy, through its Environment department, began implementing this plan by establishing an interpretation center, with technical support from the contractor ECOFAUNA and strong community engagement.

The initiative was made possible through close collaboration with the Regional Directorate of Tourism, the Regional Direction of Environment and Sustainable Development, and the Regional Tourism Office. Their support was instrumental

in empowering the Fehizoro Federation and in facilitating the successful establishment of the center. A formal specification document was developed to clearly define the responsibilities of each partner involved in the site's operations.

Through these initiatives, Ambatovy continues to promote biodiversity preservation, support sustainable community development and enhance the value of ecosystem services for both local communities and the broader environment.

Performance: Emissions, Effluents and Waste



Environmental Stewardship and Sustainable Resource Management

Our environmental program remains focused on key objectives related to air quality, noise, and water management, as outlined in our Environmental Impact Assessment and approved Environmental Management Plans. These objectives are embedded within our environmental monitoring activities and are regularly updated based on background levels, Malagasy regulations, and international standards. A comprehensive monitoring program continuously gathers real-time data from instruments across our facilities, allowing us to proactively identify and address emerging issues. This program undergoes regular reviews and refinements based on ongoing observations, project developments, stakeholder consultations, and lessons learned.

Air Quality and Emissions Management

Our air quality monitoring program ensures that any changes in ambient air quality resulting from Ambatovy activities are well understood and comply with both international and national air quality standards. Monitoring is conducted at both the Plant and Mine Sites, using a network of fixed continuous air monitoring stations and mobile multi-gas detectors that collect real-time meteorological and air quality data. While the release of greenhouse gases (GHGs) from our operations and the transportation of personnel and freight is an essential aspect of our activities, we continue to implement initiatives to minimize GHG emissions wherever feasible. These initiatives include optimizing site layouts, designing pipeline slurry transportation to prioritize gravitational flow and reduce energy demand, and expanding the use of electric vehicles for employee transport around the Plant Site.

Noise and Community Well-being

We monitor ambient noise levels at our operational boundaries and in surrounding communities to ensure that noise from our activities remains within acceptable limits. Our noise monitoring strategy aligns with the IFC's community noise standards and aims to minimize potential impacts on both local communities and biodiversity.

Water Management and Conservation

Water is a critical resource for our nickel and cobalt production processes, and we manage it with care and responsibility. Baseline studies conducted at both the Mine and Plant Sites,

along with continuous risk assessments and stakeholder engagement, inform our water management strategies. Our Water Management Plans are designed to:

- Ensure that all phases of our operations do not adversely impact surface and groundwater quality, and that wastewater meets environmental standards.
- Monitor flow rates and water quality downstream of mining activities to detect and mitigate potential risks.
- Protect sensitive ecosystems, including wetlands, from adverse operational impacts.
- Maintain open communication with downstream water users to address concerns and propose solutions where necessary.
- Ensure that water supply and sewage treatment comply with applicable water quality regulations and guidelines.

Waste Management and Circular Economy Efforts

To manage waste generated by our operations, we have developed comprehensive Waste Management Plans that outline procedures for the responsible collection, transportation, storage, and disposal of waste. These plans emphasize waste reduction, reuse, and recycling efforts to minimize environmental impact. Waste materials range from industrial by-products such as scrap metal and wood to domestic waste like food and office scraps. All waste is sorted, treated, and processed at our waste management facilities to reduce volume, recover usable materials and support our broader sustainability goals.

GHG Emission Data

In 2024, Ambatovy's carbon intensity was 58.5 tCO₂e per ton of finished nickel and cobalt produced.

Total CO₂ emissions amounted to 1776.44 kilotons, representing a decrease compared to the previous year.

Material Consumption 2024 (ERM tool)			
Material	Consumption	Unit	CO ₂ emitted (t)
Diesel Fuel	34,423,786	L	93,232.51
Coal	442,428	t	1,118,207.27
Naphtha	22,463	t	878.65
LPG	4,857	t	14,907.35
Limestone	1,255,618	t	489,157.85
Others (travel, HVAC, Landfill, ...)	-		60,060.00
Total CO₂ Emission		kt	1,776.44

Commitment to Compliance and Continuous Improvement

Aligned with our ISO 9001, 14001, and 45001 certifications, Ambatovy maintains a robust integrated reporting system for environmental, health, safety, and security incidents, known

as the Ambatovy Incident Management System (AIMS). This system ensures that spills and other incidents are thoroughly tracked, analyzed, and documented through a structured process that includes root cause analysis up to the implementation of preventive and corrective measures. This approach reflects our strong commitment to regulatory compliance, risk mitigation, and the continuous improvement of our environmental performance.

Waste Management

Waste management across Ambatovy sites is focused on increasing the volume of waste recycled and reducing landfill disposal.

Throughout 2024, 72.8% of waste was recycled, while 25.3% was landfilled. Smaller amounts were composted (0.3%), reused onsite (0.1%), incinerated (0.1%), treated through sludge spreading on landfarm areas (0.3%), and recycled as scrap metal (1.1%).

Key waste management initiatives in 2024 included:

- Implementing a hazardous waste management procedure,
- Improving waste sorting at the source (e.g., Ambatovy offices), and
- Seeking new recycling partners.

At the Mine Site, continuous improvements in waste management were observed. This was driven by the allocation of additional resources and support. These improvements continued in 2024 with the introduction of new waste treatment equipment, such as filter cutters, and the acquisition of a waste shredder. Additional initiatives included repurposing paper for composting instead of incineration. In 2024, 1,410.74 m³ of waste was landfilled, while 1,759.5 m³ was incinerated.

Since 2017, Ambatovy has remained committed to promoting external waste recycling through collaboration with local associations and companies. In 2024, four types of waste were recycled externally:

- Used wood: Processed by the FIMIAM Ampitambe Federation.
- Plastic bottles: Collected by STAR through the Kopakelatra Project.
- Used oil: Sold and recycled through a partnership with Yuanchuang Recycling Resources Co. Ltd. in Behenjy.
- Metal drums (pressed and not pressed): Managed by the VONJY AINA Association.

At the Plant Site, waste generation primarily consisted of fly ash, industrial waste, general waste, plastics, and scrap metal. In 2024, the volume of waste sent to the landfill decreased significantly compared to previous years, from 53,167 m³ in 2023 to 50,357 m³ in 2024. At the same time, waste recycling increased by approximately 39%, rising from 103,887 m³ in 2023 to 145,105 m³ in 2024. This improvement was driven by strengthened recycling partnerships and new collaborations focused on repurposing used cooking oil and aluminum. To further minimize landfill waste and increase recycling efforts, composting of food waste continued to support revegetation trials at the TMF. At the Plant Site, 109 m³ of fruit and vegetable waste was composted, producing 28 m³ of mature compost for land rehabilitation.

Looking ahead to 2025, Ambatovy's waste management priorities will focus on enhancing waste tracking through the development of effective performance monitoring systems. Strengthening oversight of treatment and recycling partners will also be a key focus, alongside initiatives to improve waste sorting at facilities. Additionally, Ambatovy aims to further diversify its recycling efforts by identifying new opportunities for repurposing domestic waste, paper, cardboard, tires, plastics, and wood scraps.

Water Management

Compliance

Ambatovy's objectives in water management are to understand and minimize our operational water footprint and manage our activities to protect water resources.

At the Plant Site, our water quality monitoring program is robust. It covers the analysis of treated water, surface water, groundwater, and seawater across all operational areas to ensure full compliance. Monitoring is conducted on a daily, weekly, monthly, and semi-annual basis in alignment with our commitments in the Environmental and Social Management Plan (ESMP) and to enable proactive decision making. Effluents from both the Plant Site and TMF are closely monitored to ensure they meet regulatory requirements and protect the surrounding ecosystem.

Our water quality standards comply with Malagasy regulations, the IFC Environmental Health and Safety Guidelines for Mining, and the World Bank's Pollution Abatement Manual. In addition, excess water from the metallurgical process is treated and discharged into the TMF. To manage effluent from the southern side of the Plant Site, we operate an automatic system designed to prevent contamination before water leaves the site boundaries.

In 2024, we achieved full compliance with key parameters across all monitoring sites, with only a few isolated non-compliance events that did not affect overall compliance. Ocean water quality, monitored bi-annually during both the wet and dry seasons, remained in full compliance with environmental standards, demonstrating our strong commitment to both terrestrial and marine environmental protection.

The Tailings Management Facility (TMF) is designed to safely manage waste materials from nickel and cobalt extraction. Solids settle at the bottom of the basins, while the clarified liquid is carefully monitored before being discharged into the ocean through a diffuser, which helps minimize environmental impact. To prevent contamination from infiltration or overflow, both



surface and groundwater are regularly monitored for quality and quantity. A network of wells and pumping systems supports early detection and mitigation of any potential contamination. Regular monitoring of ocean discharge is also conducted to ensure continued environmental protection. At the TMF, manganese is a key parameter used to evaluate water quality performance.

In 2024, downstream water quality monitoring at the TMF showed a drop in compliance at three key monitoring points – from 72% in 2023 to 50% in 2024. This decline was primarily due to extreme weather patterns linked to climate change, including prolonged and more intense rainfall during the wet season and an extended dry season. These conditions overwhelmed the pump-back system, reducing its efficiency in containing and redirecting impacted water. The increased runoff also limited the system’s ability to fully control remediation efforts on its own.

To address these challenges, we enhanced our treatment efforts by optimizing pump-back system operations and

improving the efficiency of our active pilot treatment plant, particularly to address elevated manganese levels. Looking ahead, Ambatovy remains committed to building resilience in water management through ongoing investments in treatment technologies, infrastructure upgrades, and adaptive strategies to mitigate the growing impacts of climate change on water resources.

Water Usage

In terms of water usage, Ambatovy maintained compliance with permitted water withdrawal volumes in 2024, with no exceedances recorded.

A total of 15,319,935m³ of water was withdrawn at the Plant Site, compared to 16,026,289m³ in 2023. This decrease is primarily attributed to a five-week operational shutdown between September and October, which reduced water demand.

Water Withdrawals 2020-2024 (m ³)					
Sources	2020	2021	2022	2023	2024
Ivondro	7,343,058	13,621,234	15,330,762	15,685,914	14,938,334
Groundwater	674,467	668,199	680,063	340,375	381,601
Mangoro River	3,931,760	8,572,946	8,276,589	8,718,178	7,721 344
Antsahalava Creek	560,839	1,485,153	2,559,709	3,041,594	2,910,253
Sahaviara River	8,190	78,282	29,696	25,718	17,438
Ankaja River	-	4,928	6,736	-	139,441
Vondronina River	-	13,870	84,866	93,298	95,914



A Safe and Rewarding Workplace

Objectives

- Maximize local workforce composition to have 85% of positions held by nationals.
- Develop a highly skilled and committed Malagasy workforce.
- Provide a rewarding, safe and satisfying work environment for our employees.

Approach

Our business cannot operate or thrive without a dedicated, experienced, competent and engaged workforce. Indeed, we recognize that our employees are our most valuable asset and that our performance depends on a skilled and committed team, built on respect, collaboration, and a strong culture of safety.

For our operations, we require a workforce capable of meeting the engineering, maintenance, technical, administrative, and program needs of a complex operation. We believe that creating a rewarding and satisfying work environment – offering more than just a paycheck – is key to building and retaining such a team.

To ensure Ambatovy remains an employer of choice in Madagascar, we have developed policies and strategies that support key areas such as local recruitment, training, career progression, localization and succession planning, capacity-building, internal communication, knowledge transfer, labor-management relations, performance management, health and safety, human rights, workplace discrimination and harassment, and diversity. We also promote fairness and equity in the workplace through our company values, with employees represented by Worker Delegates, the Works Council, and four active employee unions.

Teamwork is one of our values. We believe that success depends on all employees working together in a spirit of mutual respect, trust, and collaboration. Nowhere is this more important than in our labor-management relationships, which are built on four key principles:

- Treating every employee fairly and with respect.
- Demonstrating integrity in all our actions.
- Respecting employees' privacy and confidentiality.
- Nurturing Malagasy talent.

Ambatovy aims to be an employer of choice. Towards that end, we offer a range of attractive benefits that promote a positive working environment and support the well-being of our employees. Permanent employees³ are eligible for:

- A social benefits program, which includes death, accident, and disability insurance.
- A housing allowance.
- A retirement program.
- A Performance Incentive Program.
- The Daily Production Incentive Program: certain national employees are eligible to receive a variable monthly bonus based on the achievement of our daily production and safety targets.
- The Monthly Production Incentive Program: all national direct employees are eligible for a bonus when the company exceeds production targets for saleable nickel and cobalt.
- Training and development: each employee receives an individual training plan to reinforce their skills and to develop new skills valuable to the organization.

All employees and their families are eligible for medical coverage. In the event of the death of an employee or dependent, the company covers funeral expenses and repatriation services. In addition, traditional condolence payment is provided in the event of the death of a close relative.

We recognize that our company's impact on local human resources is significant and can contribute positively to the national economy through employment, capacity building, industrial experience, and the payment of taxes and wages. Ensuring the right programs are in place to support employee

³All Ambatovy direct employees are full-time employees.

development at all levels is crucial to Ambatovy’s long-term success and succession planning. Continued investment in skills development and learning, therefore, remains a key priority.

Ambatovy offers training programs in safety, mining and processing operations, maintenance trades, mobile equipment, management, leadership and other general areas to ensure that Malagasy employees have the skills needed to perform their current roles and to take on positions with increasing technical and leadership responsibility. A range of training methodologies is used, including computer-based learning, classroom instruction, workshop-based training, international exposure, coaching, and on-the-job learning. Whenever possible, we seek opportunities to bring teams and departments together to reinforce shared values and strengthen our culture. In addition, expatriate team members are expected to transfer specialist knowledge and skills to Malagasy team members, helping to build local capacity and support ongoing career development.

The presence of Ambatovy’s workforce inevitably impacts local communities. Overall, these impacts are largely positive – for example, through contributions in the housing and construction markets, and through increased spending in the local economy with more wage earners living in the area. However, some impacts can potentially be negative, such as increased pressure on local resources and municipal services due to an influx of new residents.

To help mitigate this, our recruitment process prioritizes local candidates who meet the skills requirements before extending the search to candidates from other regions. This approach promotes local job creation and helps reduce the inflow of people looking for work in our host communities.

Over a decade of operations, Ambatovy has made a lasting contribution to the development of Madagascar’s labor force. Our commitment to fair, inclusive, and forward-thinking labor practices continues to help raise national standards in industrial and technical trades. By investing in skills development and offering practical, on-the-ground experience, we are strengthening the capacity of the country’s workforce and providing a pipeline of qualified, experienced professionals for both Ambatovy and the broader industrial sector.

As mentioned in the section on Governance and Human Rights, we also uphold high expectations for our contractors. All are



required to operate legally in Madagascar and to comply with the same codes of conduct and corporate policies that apply to our own workforce. These include policies on Health and Safety, Code of Conduct, Zero-Tolerance, Anti-Corruption, and Human Rights. To ensure continued alignment, we regularly audit active suppliers and contractors for compliance with these standards.

Performance



Local Recruitment

Building and sustaining a highly skilled national workforce remains one of Ambatovy’s core strategic commitments. This approach not only strengthens Madagascar’s talent pool but also ensures that our operations are supported by a workforce equipped with the right skills and competencies.

We continue to collaborate with different technical schools and universities to identify promising young Malagasy graduates, many of whom join our internship program – a key pillar of our nationalization strategy.

In 2024, due to technical and operational constraints, external recruitment was temporarily put on hold. However, this challenge was transformed into an opportunity: Ambatovy’s HR and Management teams intensified efforts on internal mobility and staff development, leading to strong progress in employee growth and succession planning.

Key achievements in 2024 included:

- 229 talent reviews conducted, supporting the internal placement of more than 200 positions.
- 97 interns recruited and actively progressing through training programs to become highly skilled technicians and operators for both the Plant and the Mine.
- 44 internal recruitments completed, reinforcing our commitment to promoting from within.
- 67 skilled and semi-skilled technicians/operators completed their training and were offered employment contracts.
- Continued development of the internship program, focused on training young Malagasy talent to assume key operational roles over time – supporting the gradual replacement of expatriates in strategic positions.
- Direct fixed-term contracts offered to high-performing national trainees, reinforcing long-term career opportunities and local succession planning.

Approximate Project Wide Employee Headcount December 2024			
	National	Expatriate/ PN	Total
Direct Employees*	3,288	386	3,674

*All direct employees are full-time employees reported in head count. Ambatovy does not employ temporary, part-time or non-guaranteed hours employees.

With a total workforce of 3,674 employees as of December 2024 – 89% of whom are Malagasy nationals – our team is well-positioned to support Ambatovy’s growth and strategic direction.

Diversity and Inclusion in the Workplace

Diversity and inclusion are increasingly important across all sectors of society, and especially so in the natural resources sector, where women and individuals from diverse backgrounds and abilities have historically been underrepresented. At Ambatovy, we recognize that embracing a wide range of cultural backgrounds, genders, ages, and life experience makes us a stronger, more innovative and resilient company.

At Ambatovy, our policy is to find the right person for each role, regardless of gender, race, ethnicity, religion, or background. While we prioritize local employment in our recruitment efforts, all positions are filled based on merit – with selection grounded in relevant experience and required competencies.

Our compensation structure is role-based, with remuneration aligned to the responsibilities and accountability of the position – it is not determined by gender or age.

Though the mining and industrial sectors remain traditionally male-dominated, Ambatovy has steadily increased the representation of women across all levels of the organization. Women now serve as electrical technicians, geologists, forestry engineers, millwrights, truck drivers, and electrical motor repair technicians – as well as in leadership roles.

By the end of 2024, approximately 12.6% of our direct employee workforce was female, a figure we aim to continue growing through targeted recruitment, development programs, and inclusive workplace practices.

Breakdown of Direct Employees by Age and Gender December 2024						
	Under 30		30-50		Over 50	
	Male	Female	Male	Female	Male	Female
National	393	85	2,142	355	291	22
Expatriate	5	2	279	20	76	4

Training, Capacity Building and Skills Transfer

Ensuring the right programs are in place to support employee development at all levels is crucial for Ambatovy’s long-term success and succession planning. Continued investment in skills development and robust skills pipelines therefore remains a key priority.

In line with our Strategic Plan, Ambatovy prioritizes skills development to ensure that employees are well-equipped to carry out their duties and to assume roles with increasing technical and leadership responsibilities. In 2024, Ambatovy advanced its training and development activities by launching a joint venture with the Artisan Training Institute (ATI) to better

meet business needs, while continuing the Internship Program, which supported 291 interns and skilled graduates from higher technical schools. Over the year, a total of 252,226 training workhours were delivered, alongside the implementation of a new Learning Management System (INX).

In 2024, the development activities focused on coordinating regulatory training, revalidating competencies, accelerating trade skills, and cultivating leadership essentials. These initiatives are designed not only to improve individual performance but also to build a high-performing, sustainable organization capable of adapting to future challenges.

The training team also played a key role in building the skills pipeline for maintenance and operations.

Training in these areas achieved the following results:

- **Health and Safety Training:** This critical training is mandatory for all employees and contractors and underpins safe operations across all sites. In 2024, Ambatovy rolled out a revised chemical risk training module in response to audit recommendations from ISO Certifications 45001 and 14001. The updated module aims to improve hazardous material management and increase employee awareness of chemical-related risks at both the Plant and Mine Sites. Regulatory training and Verification of Competency (VoC) sessions were also coordinated during the Total Plant Shutdown. A total of 86,832 training workhours were completed during the year – an increase from 86,576 in 2023 – despite a reduced contractor presence onsite.
- **Trade Training Program:** Launched in 2019, this program accelerates the development of national technicians across multiple trades. Of the 338 technicians initially enrolled in staged programs (including electrical, instrumentation, mechanical, welding, machining, HVAC, power generation, and hydro-compressor disciplines), 314 remained active, with 241 (77%) successfully completing the full program. In addition, 47 semi-skilled fixed plant fitters successfully achieved certification and were hired as full-time employees. At the end of 2024, 101 maintenance trainees across various disciplines were enrolled in the Internship Program and are expected to join the business as employees by 2026.
- **Competency Revalidations:** Competency revalidation efforts continued for Plant Process Operations staff, with 118 operators receiving training aligned to their progression ladders. Over the year, 1,519 formal assessments were conducted. As a result, 96 operators earned certifications as Control Room Operators, Permit Coordinators, Field Operators II, and Lead Operators, maintaining a 100% success rate. In parallel, 24 operator interns from Ambatovy’s Internship Program (launched in 2022) were placed within operations, and 88 skill-set operators were trained to fill vacant positions.
- **Multiskilling Training for HME Operators:** Ambatovy continued its Multiskilling Training Program for Heavy Mobile Equipment (HME) Operators, first established in 2021. The program ensures operators can proficiently handle various types of heavy equipment, enabling greater flexibility within operational teams. Enrollment increased from 216 operators in 2022 to 318 in 2024, with training across multiple equipment types.

- Trade Training Program for HEM Employees: Initiated in 2018, this program focuses on developing highly qualified Heavy Mobile Equipment Maintenance (HEM) Technicians, capable of servicing and maintaining HME equipment to internationally recognized standards. In 2024, an additional 47 trainees were certified as Maintenance Technicians.



Meanwhile, 41 current HEM trainees remained enrolled in the Internship Program and are expected to graduate into the workforce in 2026.

- Trainer Progression Pathway: Ambatovy’s Trainer Progression Pathway supports professional development through three levels of trainer certification. In 2024, two trainers achieved Trainer III certification. In addition, three mechanical trainers earned their Trade Test Certification through the ATI in South Africa.
- Leadership Development: The Ambatovy Leadership Program continued to develop and reinforce frontline and mid-level leadership, aligning closely with the company’s values and operating context. To date, 100% of leaders have completed Part 1 of the *Foundations of Supervision* (FOS) course, and 67% have completed Part 2.

Labor-Management Relations

At Ambatovy, we have both unionized and non-unionized employees, and we fully respect our employees’ rights to freedom of association and collective bargaining. All national employees contracted under DMSA and AMSA (89% of our direct employee workforce) are covered by a Collective Bargaining Agreement (CBA). In 2024, we continued to uphold the commitments set out in the CBA signed in March 2023.

For expatriate employees, terms of employment and working conditions are defined through individual employment contracts.

As with all our relationships, we strive to maintain positive, productive, and mutually beneficial relationships with all employees and their union representatives. When labor grievances arise, we investigate each case thoroughly and work to reach a fair resolution. Once resolved, the Management team reviews the issues raised to identify any opportunities for process improvements. In 2024, 16 grievances related to working conditions were reported and all were resolved. This marks a significant improvement from 2023, when 40 such grievances were recorded.

Approach: Health and Safety

Ambatovy is committed to maintaining a healthy and safe workplace for all employees, contractors, visitors and neighboring communities. Health and safety is our top priority, and we believe that all injuries are preventable. Our operations are guided by a zero-harm health and safety culture. We work proactively to minimize operational risks to both our workforce and nearby communities and engage with these important stakeholders regularly on matters of safety, security and emergency response. For more information about our work to support health and safety at the community level, please see the section on Communities and Social Relations, earlier in this report.

Our Health and Safety (HS) team plays a central role in supporting employees to identify hazards, assess risks, implement controls, and monitoring performance. The team also oversees training, work authorizations and reporting processes. Health and safety performance is reported regularly to Management to drive continuous improvement. Our incident recording and reporting system is compliant with the International Labor Organization’s (ILO) Code of Practice on Recording and Notification of Occupational Accidents and Diseases.



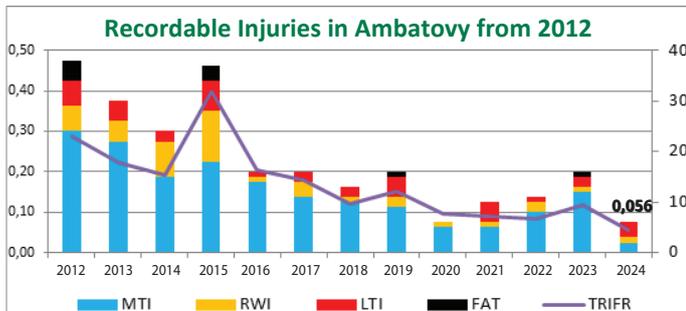
Performance: Health and Safety



Ambatovy’s zero-harm and Health and Safety culture is supported by a range of strategic programs and initiatives, including Leadership in the Field, training, the “three-in-a-row” initiative, awareness campaigns, standards development, and a business assurance program that verifies compliance with our Fatality Prevention Standards. We carefully track our safety performance against benchmarks set by the International Council on Mining and Metals (ICMM) and ensure continuous improvement and safe production through comprehensive auditing and reporting systems. Any safety observation, near miss, or incident is seen as an opportunity to improve. In 2024, Ambatovy maintained ISO 45001 certification for its safety management system, the highest international standard for occupational health and safety.

Ambatovy Health and Safety Performance 2020-2024					
	2020	2021	2022	2023	2024
AIFR	0.42	0.47	0.35	0.37	0.18
TRIFR	0.10	0.09	0.08	0.117	0.056
LTIFR	0.00	0.04	0.01	0.02	0.03

*Rates are calculated based on 200,000 hours worked and include hours worked by both direct employees and operational contractors.



In 2024, Ambatovy met its safety performance targets for the year except for the Lost Time Injury Frequency Rate (LTIFR), which stood at 0.03. The Total Recordable Injury Frequency Rate (TRIFR) was 0.056, and the All Injury Frequency Rate (AIFR) was 0.18. These results reflect Ambatovy’s commitment to rigorous incident investigations, ongoing investment in safety training programs, and the consistent implementation of corrective and preventive actions.

In 2024:

- There were six recordable injuries at Ambatovy, including Medical Treatment Cases, Restricted Work Cases, and Lost Time Injuries. These injuries involved three Ambatovy employees and three employees of contractor partners. Importantly, no work-related fatalities occurred.
- The Total Recordable Injury Frequency Rate (TRIFR) was 0.06 for Ambatovy and 0.05 for business partners, based on a total of 21, 357,025 hours worked.

Hand injuries were the most common type of work-related injury recorded in 2024, primarily due to unsafe working methods, the use of inappropriate tools, and a lack of attention to the “line of fire” principle.

As an industrial enterprise, managing risks daily to maintain an injury-free workplace remains one of our greatest challenges. Work-related hazards that pose risks for recordable injuries

are identified through Ambatovy’s Operational Control and are addressed in our Fatality Prevention Standards. Every task, whether routine or specialized, must undergo a thorough risk assessment before work begins. This process includes hazard identification and the implementation of controls, based on the hierarchy of controls outlined in Ambatovy’s Risk Management Procedures.

To instill a safety culture focused on prevention, Ambatovy continues to implement its Health and Safety Road Map, which is structured around three core pillars: Fatality Prevention, Injury Prevention and Catastrophic Event Prevention.

In 2024, Ambatovy continued to work on the road map progress across all three pillars. A key improvement was the increased involvement of senior leaders (Superintendents, Managers and Directors) in leadership in the field. This hands-on leadership is essential to promoting a positive safety culture, supporting a physically and mentally healthy workplace, and driving overall performance at all levels.

In 2024, to bring these pillars to life, Ambatovy implemented specific actions and initiatives across each area, including:

- **Fatality Prevention:** A Critical Controls Booklet was developed and implemented. It requires field supervisors to verify that all safety controls related to a task are in place before authorizing work to begin, ensuring fatality risks are minimized. Fatality Prevention Committees oversee each of the 12 Fatality Prevention Standards. These committees, led by a manager with subject matter expertise continue managing specific action plans and ensure the effective implementation of each standard. Progress is reviewed monthly, allowing for adjustments to controls based on committee focus and organizational expectations.
- **Injury Prevention:** Reinforcing the best practices in the field focus on encouraging proper work methods, the use of appropriate tools, and strict adherence to the “line of fire”. To reinforce this approach, an incident learning campaign was launched, enhancing employee awareness and understanding and implementing safe work methods through HS communication on lessons learned from past incidents. Increased reporting has helped identify safety system weaknesses and identify additional mitigation measures to avoid reoccurrences and or new incidents.
- **Catastrophic Event Prevention:** The Process Safety team worked closely with operational and engineering teams across all process areas to reinforce safety requirements and monitor critical controls. The main focus was to reduce Loss of Primary Containment (LOPC) Category 1 events to prevent catastrophic events.





Responsible Production

Objectives

- Provide and promote products that are produced and consumed in a socially, ethically and environmentally responsible manner.
- Remain committed to implementing policies and management systems aligned with OECD requirements and with good industry practice, ensuring supply chain due diligence in the responsible production of our minerals.
- Maintain ISO 9001:2015 certification to demonstrate our commitment to quality and to meet our customer and interested parties' needs.
- Maintain ISO 14001:2015 and ISO 45001:2018 certifications to demonstrate our commitment to environmental management, workplace health and safety, and continuous improvement in line with international standards.

Approach

Society and markets increasingly demand responsibly and ethically produced goods. Downstream customers of Ambatovy are, in turn, requesting more robust evidence of policies, management systems, and supply chain due diligence to ensure responsible mineral production and sourcing. Ambatovy is committed to extracting and producing minerals in a manner that meets our stakeholders' social, ethical, environmental, and human rights expectations. We continue to work with partners, suppliers and customers to advance these commitments.

The adoption of responsible sourcing obligations reflects a broader global shift in the extractives industry. In recent years, organizations and institutions, such as the International Council on Mining and Metals (ICMM), the Extractive Industries Transparency Initiative (EITI) and the Organization for Economic Cooperation and Development (OECD), have developed and refined various standards to encourage more sustainable and ethical practices. These initiatives have largely been driven by a combination of factors: the need to reduce supply chain and operational risks; consumer demand for ethically sourced products, and growing pressure from the international community and investors to align business practices with human rights and sustainable development goals.

In October 2019, the London Metal Exchange (LME) introduced a new policy to promote the responsible sourcing of metals. The LME Policy on Responsible Sourcing sets out mandatory requirements relating to labor practices, environmental

protection and supply chain due diligence. A key objective of the policy is to prevent conflict minerals from being traded on the exchange. It requires producers to ensure their brands comply with ISO 14001 (environmental management systems), and ISO 45001 (occupational health and safety management systems)⁴, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). Ambatovy has two LME-listed products, nickel and cobalt, and has been working to meet these requirements. A cross-functional internal Responsible Sourcing Working Group – comprising representatives from HSEQ Management System, Marketing, Environment, Social Investment and Community Development, and Legal – guides the implementation of our responsible sourcing commitments.

To meet customer and stakeholder expectations, we have aligned our operations with international standards including ISO 9001, ISO 14001, ISO 45001, the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI), and the OECD Due Diligence Guidance. During 2024, our efforts included conducting internal audits, training employees, suppliers and subcontractors, performing gap assessments, and collaborating with industry associations for technical support. Our customers can be assured that Ambatovy produces high-quality nickel and cobalt in full compliance with applicable laws, regulations, and leading international standards.

⁴Producers must be compliant with the ISO standards or with Equivalent Certification Programs.

Ambatovy has a robust management system in place to identify and manage environmental and social risks, and to meet or exceed performance expectations.

The Ambatovy Quality Policy is our formal commitment to supplying reliable services and defect-free products to all our customers. To uphold this commitment, we aim to:

- Understand customer requirements as agreed;
- Communicate effectively with both customers and suppliers;
- Complete our work correctly the first time;
- Deliver products that meet established quality standards;
- Promote clear communications around safety and quality;
- Engage all personnel in the quality process;
- Continuously improve our systems and practices;
- Comply with all applicable laws and regulations.

A key mechanism for implementing this approach is our Quality Management System (QMS), which was first certified to ISO 9001:2008 in 2014. This milestone supported the successful registration of our nickel and cobalt briquettes on the London Metal Exchange. Since then, we have undergone annual audits to maintain ISO 9001 compliance. In 2017, our QMS was upgraded to the more stringent 2015 version of the ISO 9001 standard and in 2020, we successfully renewed our certification. Most recently, in 2023, we achieved another successful renewal, reaffirming Ambatovy's commitment to quality and underscoring the company's dedication to customer and stakeholder satisfaction.

Performance



Responsible Sourcing

As part of Ambatovy strategy, the company has been engaged with the Responsible Minerals Initiative's Responsible Minerals Assurance Process (RMI RMAP) since 2021. In line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, Ambatovy regularly conducts assessments to determine its classification with respect to Conflict-Affected and High-Risk Areas (CAHRAs). The 2022 CAHRA assessment concluded that Ambatovy is not classified as operating in a high-risk area, and this status remained unchanged in 2023 and throughout 2024, based on ongoing reviews using the same robust methodology.

Ambatovy was certified against the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, the Cobalt Standard of 2018, and the OECD Due Diligence Guidance in 2022. In August 2023, zero non-conformities were confirmed by our external assessor with respect to the Mica Standard of 2021, the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of 2021, and the Global Responsible Sourcing Due Diligence Standard for All Minerals of 2021, as well as the OECD Due Diligence Guidance. We have maintained our certifications.

In 2024, the external audit scheduled for that year was postponed to March 2025. Nonetheless, we successfully passed our annual compliance review, maintaining our high standard

and reaffirming our commitment to transparent and ethical supply chain practices.

Our Responsible Mineral Sourcing Policy, validated in March 2023, and updated in June 2025, remains in effect and continues to guide our actions and supplier engagement. It is publicly available on our website.

For more information about the RMI RMAP, please refer to Appendix 3.

Material Stewardship

Ambatovy's nickel and cobalt are stable, unreactive metals, widely used in the production of stainless steel, other metal alloys, specialty chemicals, and a variety of other applications. However, our production process involves industrial and hazardous materials, such as chemicals and compressed gases.

Ambatovy has developed detailed policies and procedures for the handling, transport, storage, recycling, and disposal of such materials. We maintain Safety Data Sheets (SDSs) from suppliers for all hazardous substances used, and produce SDSs for Ambatovy products and by-products. These data sheets are electronically accessible to employees and are also made available to our customers in various languages.

Training is provided on proper handling procedures and on the use of appropriate Personal Protective Equipment (PPE), where applicable. Our procurement and transportation handling procedures continue to align with regulations from the International Maritime Organization (IMO), the International Air Transport Association (IATA), and the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).

Where possible, we prioritize the procurement of goods and services that offer positive social or environmental returns. ALBI continues to collaborate with local businesses to source a range of items for our operations. Examples of procurement initiatives are available in the Economic Performance section.

Customer Relations, Health and Safety

Ambatovy's nickel products are marketed and sold through our shareholder companies (Sumitomo and KOMIR) to end customers. Cobalt products are marketed directly by Ambatovy, including through exclusive distribution arrangements in Europe and the USA. In other geographical areas, such as Asia and Africa, Ambatovy markets and sells cobalt directly to the end customer.

Ammonium sulphate, primarily used as an agricultural fertilizer, is marketed and sold under exclusive distribution arrangements in both local and global markets.

Ambatovy and our partner companies are committed to ensuring that customers have access to reliable, science-based information regarding the health and environmental effects of our products.

In 2024, we continued to assess the health and safety aspects of our products through active membership and participation in international industrial organizations such as the Nickel

Institute (NI), the Cobalt Institute (CI) as various consortia established to ensure compliance with the European Union's Registration, Evaluation, Authorization and Restriction of Chemical Substances (REACH) and Classification, Labelling, and Packaging (CLP) regulations.

All Ambatovy products are accompanied by comprehensive SDSs that include hazard classifications, handling recommendations, and safety protocols, tailored to meet applicable regulatory standards in the regions where they are sold.

Customers in the European Union have cooperated in the development of specific Generic Exposure Scenarios to support compliance with REACH regulations. These scenarios provide guidance on the operating conditions required to ensure the safe use of both nickel and cobalt, helping to mitigate potential risks for workers handling Ambatovy products and minimizing possible impacts on surrounding populations near facilities producing or using these substances.

Ambatovy products comply with all applicable rules and regulations, including REACH and CLP, in where they are marketed and sold. Hazardous substances are clearly labelled to ensure proper handling, and these labels serve as critical

indicators for carriers during transportation. Transporters adhere to internationally recognized standards, including the International Maritime Dangerous Goods (IMDG) Code, to ensure safety throughout the logistics chain.

Nickel and cobalt produced by Ambatovy are sold directly to industrial end-users, who are typically well-versed in the relevant health and safety requirements. In contrast, consumers who use the final products made with these metals rarely come into direct contact with the refined substances themselves.

The international organizations to which Ambatovy belongs, including the Nickel Institute and the Cobalt Institute, play a key role in promoting safe and appropriate use of these substances and advocating for science-based regulatory approaches. Environmental considerations related to our products are communicated through multiple channels, including Safety Data Sheets (SDSs), product labelling, usage guidance, environmental quality standards, and REACH-compliant exposure scenarios for industrial use.

There have been no reported incidents of non-compliance with regulations or voluntary codes related to the health and safety of Ambatovy's products.

Product Information Required	
Information required for product labelling	Yes
Content, particularly with regard to substances that might produce an environmental or social impact	Yes
Safe use of the product of service	Available on SDSs and on the NI and CI websites
Disposal of the product and environmental/social impacts	A caution to dispose of materials and containers in accordance with the applicable national, regional and/or local environmental regulations is included on SDSs; due to the high value of nickel and cobalt, global recycling rates are significant

— Appendices —

Appendix 1: The Sustainable Development Goals

The United Nations' Sustainable Development Goals (SDGs), which follow the Millennium Development Goals, consist of 17 ambitious targets designed to address global issues and ensure a sustainable and resilient future for the world by 2030. The success of the SDGs depends on the participation of a range of actors – governments, communities, non-governmental organizations, and corporations.

The natural resources sector has social, economic and environmental impacts on the jurisdictions where projects and operations are located. As a responsible company operating in both a low-income country and a biodiversity hotspot, we work to minimize and mitigate the potential negative impacts of our activities, while also focusing on actions that create positive outcomes for local communities and Madagascar as a whole. To this end, the SDGs serve as a reference framework for us to gauge how and to what extent we are contributing to Madagascar's development and to its achievement of these globally recognized sustainability targets.

Below is a summary of ways in which Ambatovy contributed to the achievement of the 17 SDGs during 2024.

More information about our work can be found throughout this report.



End poverty in all its forms everywhere

- One of the largest private sector employers in Madagascar, contributing to household income security.
- As of 2024, employed 3,674 direct employees – 89% of whom are Malagasy.
- Recruitment practices that prioritize national talent, especially from local communities near operational sites.
- Strong focus on skills development and vocational training, to enhance employability both within and beyond the company.
- Support for income-generating activities and promotion of Village Saving Loan Associations (VSLAs) to foster financial resilience in local communities.
- Policy of “Buy locally, hire locally” promotes economic inclusion and benefits small businesses and service providers in surrounding regions.
- Support for entrepreneurship through business incubation programs and SME capacity-building.
- Investments in community infrastructure, indirectly reducing the cost of living and improving local economic stability.
- Social development programs targeting vulnerable populations, including access to basic services, education support, and disaster relief when needed.



End hunger, achieve food security and improved nutrition, and promote sustainable agriculture

- Agricultural and livestock training for local community members to enhance food production capacity and diversify livelihoods.
- School nutrition program implemented with regional education and nutrition offices in 18 primary schools in the Atsinanana and Alaotra Mangoro regions.
- In the 2023-2024 school year, 172,936 meals and 69,040 bean-based snacks were distributed to children in Toamasina.
- Provision of 190 kg of fertilizer for school gardens supplying fresh vegetables for school canteens.
- Donation of ammonium sulphate fertilizer and promotion of its use among smallholder farmers as an affordable and appropriate option to enhance crop yields and strengthen food security.
- Encouragement of climate-resilient agricultural practices and crop diversification in areas affected by environmental challenges.



Ensure healthy lives and promote well-being for all, at all ages

- Regular HIV/AIDS awareness-raising and voluntary testing campaigns for Ambatovy employees and surrounding communities.
- Assistance during public health emergencies.
- Support for local health facilities through donations of medical equipment or supplies to support access to healthcare.
- Free mobile medical consultations provided in remote villages with limited access to healthcare.
- Donation of seeds and agricultural inputs to help farmers rebuild their livelihoods following cyclone damage.
- Ongoing efforts to maintain a safe and healthy work environment for all employees, with training, protective equipment, and regular health check-ups.



Ensure inclusive and equitable education and promote lifelong learning opportunities for all

- Extended scholarship program in partnership with the Ministry of Education, prioritizing girls and including a 25% quota for boys, to improve access to secondary and higher education for vulnerable youth in Ambatovy's zones of intervention.
- Ongoing training and leadership development for our employees to build skills and promote internal career growth.
- Assistance to local technical and vocational schools, including equipment donations, training support, and curriculum alignment with local employment needs.
- Support for school nutrition and feeding programs to improve concentration and academic performance.
- Support for national campaigns against child exploitation and continued collaboration with the Moramanga Child Protection Network, reinforcing children's rights and school attendance.



Achieve gender equality and empower all women and girls

- As of 2024, women represent 13% of Ambatovy's total workforce, reflecting our ongoing commitment to gender diversity and inclusion.
- Ambatovy promotes equal employment opportunities across all levels, including for traditionally male-dominated roles in mining operations.
- Implementation and promotion of income-generating activities and VSLAs supporting female-headed households to enhance financial independence and community resilience.
- Strong enforcement of a Zero Tolerance policy on sexual exploitation, harassment, and abuse, with particular focus on protecting young girls and vulnerable women.
- Ongoing awareness and training campaigns on gender-based violence prevention within Ambatovy and surrounding communities.
- Continuation of scholarship programs for vulnerable girls within Ambatovy's zones of operation to improve access to education and reduce gender disparities.
- Programs aimed at building leadership skills among women both within Ambatovy and in the wider community to foster empowerment and participation in decision-making processes.



Ensure viability and sustainable management of water and sanitation for all

- Continued collaboration with local Water Users Associations (WUA) to promote community ownership and sustainable management of water resources.
- Installation and upkeep of water pumps and water points in villages and schools to improve access to clean and safe water.
- Implementation of an extensive water monitoring system across all Ambatovy sites, ensuring compliance with environmental standards and early detection of potential issues.
- Regular testing and reporting to maintain transparency and safeguard water resources.
- Support for hygiene promotion and sanitation awareness campaigns in local communities and schools to complement improved water access and reduce waterborne diseases.
- Integration of water efficiency and conservation practices within Ambatovy's operations to minimize water use and reduce environmental impact.



Ensure access to affordable, reliable, sustainable, and modern energy for all

- In 2024, Ambatovy continued to advance its commitment to sustainable energy by expanding the electric vehicle fleet at the Plant Site, reducing reliance on fossil fuels and lowering greenhouse gas emissions.
- Ongoing efforts were made to optimize energy efficiency across operations, aligned with Ambatovy’s broader decarbonization and environmental sustainability goals.



Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all

- In 2024, Ambatovy maintained a robust employment program offering comprehensive employment benefits to its workforce, supporting both employee well-being and productivity.
- The Works Council continued to play a vital role in strengthening employee relations and fostering constructive dialogue between employees and management.
- Contractor engagement remained stringent, with strict adherence to health and safety standards, human rights, and environmental compliance embedded in contract requirements.
- Ambatovy actively collaborated with over 400 local suppliers, supporting local economic development and entrepreneurship.
- Income generating activities and VSLAs were promoted to empower community members and diversify livelihoods.
- Agricultural produce used in Ambatovy’s canteens was sourced from nearby farmers’ groups, further stimulating local economies.



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

- Extensive road rehabilitation and construction projects were completed to improve accessibility and connectivity around operational sites.
- The Social Investment Fund finalized key infrastructure investments supporting local development.
- Ambatovy supported innovative pilot projects in environmental management and operational efficiency, underscoring its commitment to sustainable industrial practices.



Reduce inequalities within and among countries

- Nickel remained one of Madagascar’s top export products, supporting the national currency and helping to narrow the trade deficit.
- Ambatovy continued to generate significant foreign exchange earnings through investment, expatriate salaries and international product sales.
- The company maintained a firm stance against corruption and continued to support efforts at both national and local levels.
- Ambatovy promoted the good governance of mining royalties, advocating for their transparent, equitable and sustainable use to benefit communities.
- By fostering local employment, sourcing from regional suppliers, and supporting inclusive development programs, Ambatovy contributed to reducing regional disparities and promoting economic inclusion in our areas of operation.



Make cities and human settlements inclusive, safe, resilient and sustainable

- We worked closely with regional authorities to strengthen disaster preparedness and response systems, particularly in areas vulnerable to industrial or natural risks.
- Ambatovy provided support for cyclone relief efforts in affected communities, including the provision of cyclone prevention equipment and emergency supplies.
- Road safety training and pedestrian awareness programs were conducted in the communities around our operations..



Ensure sustainable consumption and production patterns

- In 2024, we continued to help stabilize local market prices by sourcing produce through collection centers that work directly with local farmers.
- We supported the development of local businesses that provide goods and services to Ambatovy and the broader industrial sector, helping to build a resilient local supply chain.
- Our waste management practices were enhanced with further investments in recycling and reuse initiatives.
- We emphasized circular economy principles in our operations, including reuse of treated wastewater and recycling of materials where possible.
- Ongoing monitoring and reporting ensured transparency in our production practices and helped guide continuous improvements.



Take urgent action to combat climate change and its impacts

- Extensive reforestation work and conservation actions carried out with local community involvement.
- Minimization of emissions by utilizing a gravity-fed system to transport slurry along the Pipeline from the Mine to the Plant and by importing low emission coal for Plant processes.
- Coordinated bus transport for employees and installation of an electric vehicle fleet.
- Launch of a “decarbonization journey” to lower carbon emissions.



Conserve and sustainably use the oceans, seas, and marine resources for sustainable development

- Recycling of process water rather than relying entirely on river water withdrawals.
- Conservation activities for rivers in our areas and the native fish species, including control of invasive species.
- Waste treatment through the Tailings Management Facility to ensure that water discharged into the sea has the same composition as marine water.
- Support for the Blue Economy through sustainable, small-scale fishing initiatives.



Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and halt biodiversity loss

- Extensive biodiversity monitoring, mitigation and restoration program in place.
- BBOP pilot project from 2009 to 2018, promoting avoidance, minimization, restoration and offsets to achieve no net loss in biodiversity.
- Work with village organizations on monitoring and enforcing the sustainable use of ecosystem services.
- Protection of conservation offset sites.
- Protection, monitoring, evaluation, and study of flora and fauna in our conservation areas.
- Environmental awareness-raising at schools and at community level for communities surrounding our conservation zones.
- Awareness-raising on the damage caused by slash-and-burn agriculture, poaching, bush meat consumption, and endangered species trade.



Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable, and inclusive institutions at all levels

- Support for the EITI process and participation in the Voluntary Principles on Security and Human Rights.
- Collaboration with Government and local authorities to develop a mechanism for the safe, transparent, equitable and sustainable management of mining royalties.
- Partnership with the local NGO SAHA for capacity building, guidance and accompaniment of Communes receiving our royalties.
- Firm stance on business ethics and anti-corruption, which all employees and contractors must adhere to.
- Work with the international NGO Search for Common Ground to foster constructive company-community dialogue, to promote mutual understanding and to build trust.



Strengthen the means of implementation and revitalize the global partnership for sustainable development

- Extensive partnerships supporting our activities in health, education, livelihoods, social development, the environment and good governance.
- Partnerships and close collaborations with the public, private, NGO, and business communities in Madagascar and around the world.



Appendix 2: Partnerships and Associations

Ambatovy is a member of several industry associations and initiatives. We are a member of the Multi-Stakeholder Group (National Committee) for the EITI in Madagascar, the Chamber of Mines of Madagascar, the Madagascar Industries Union (*Syndicat des Industries de Madagascar, SIM*) and the Madagascar Business Association (*Groupement des Entreprises de Madagascar, GEM*). We also engage with international industry bodies, such as the Nickel Institute and the Cobalt Institute.

Ambatovy is also a member of several regional coordination committees with civil society and local government. Ambatovy has worked in recent years with a number of local, national and international organizations to ensure transparency, to create opportunities, to broaden networks and perspectives, and to develop sustainable operations. These partners and associations include:

International

- Cobalt Institute
- Columbus Zoo
- Conservation International
- Duke Lemur Center of Duke University
- Extractive Industries Transparency Initiative (EITI)
- Forest Trends
- Henry Doorly Zoo
- International Raw Materials (IRM)
- Japanese International Cooperation Agency (JICA)
- Joint United Nations Programme on HIV/AIDS (UNAIDS)
- Madagascar Fauna and Flora Group (MFG)
- Missouri Botanical Garden (MBG)
- Nickel Institute
- Office for the Coordination of Humanitarian Affairs (OCHA)
- Office of the High Commissioner for Human Rights (OHCHR)
- South African Institute for Aquatic Biodiversity
- The Peregrine Fund

National

- *Action et Développement*
- American Chamber of Commerce (AmCham)
- Asity Madagascar (an affiliate of BirdLife International)
- *Association Nationale d'Actions Environnementales (ANAE)*
- *Association Handicaps Esperance Tamatave*
- *Brickaville Miara-Mitraka (BRIMIMI)*
- *Bureau National de Gestion des Risques et des Catastrophes (BNGRC)*
- Canadian Chamber of Commerce and Cooperation (CanCham)
- *Centre d'Études et de Recherches Ethnologiques et Linguistiques (CEREL)*
- *Centre National de Recherches Océanographique (CNRO)*
- *Centre National de Recherche sur l'Environnement (CNRE)*
- *Centre Technique Horticole de Tamatave (CTHT)*
- Chamber of Mines of Madagascar

- *Circonscription de l'Environnement et du Développement Durable (CIREDD)*
- Cultural and Social Center (CCS)
- Department of Animal Biology at the University of Antananarivo
- Diocesan Development Office of Toamasina (ODDIT)
- *Direction Générale du Développement Durable (DGDD)*
- *Direction Régionale de l'Agriculture et de l'Élevage (DRAE)*
- *Direction Régionale de l'Environnement et du Développement Durable (DREDD)*
- *Direction Régionale de la Pêche et de l'Économie Bleue*
- *Direction Régionale de Tourisme*
- *EcoFauna*
- *Ezaka ho Fampanandrosoana any Ambanivohitra (EFA)*
- *Ezaka Vaovao*
- *Fehizoro Federation*
- *Fianakaviana Sambatra (FISA)*
- *Fifanampiana Kristiana ho an'ny Fampanandrosoana eto Madagasikara (FIKRIFAMA)*
- *Fikambanambe Mivondrona Ampitambe Mahatsara (FIMIAM)*
- *Groupe d'Étude et de Recherche sur les Primates (GERP)*
- *Groupe Mavitrika, University of Tamatave*
- *Groupement des Entreprises de Madagascar (GEM)*
- *Kopakelatra Project*
- *La Fabrique*
- Love and Care Organization
- Madagascar Consulting Ingredients (MCI)
- *Maison des Jeunes Moramanga*
- *Malagasy Red Cross Society*
- *Mamizo*
- Man and the Environment (MATE)
- *Miarintsoa*
- MIDEM (Independent Mission for Development and Education in Madagascar)
- Ministry of Agriculture
- Ministry of Education
- Ministry of Handicrafts and Trade
- *Mitsinjo Association*
- Museum of Art and Archeology of the University of Antananarivo (ICMAA)
- *Ny Sahy*
- *Ombona Tahiry Ifampisamborana Vola (OTIV)*
- Private Sector Humanitarian Platform of Madagascar (PSHP)
- Regional Office of Nutrition (ORN)
- Regional Tourism Office of Alaotra Mangoro (ORTALMA)
- SAF/FJKM
- SAHA (*Sahan'Asa Hampandrosoana ny eny Ambanivohitra*)
- St. Gabriel
- *Syndicat des Industries de Madagascar (SIM)*
- University of Antananarivo
- *Vahatra*
- *Voahary Voakajy*
- *Vohimanana*
- *Zararano Project*

Appendix 3: Compliance with External Initiatives

Ambatovy strives to maintain the highest standards, to respect local culture and traditions, and to comply with the laws and regulations of Madagascar. We endeavor to meet – and where possible, exceed – the mandatory compliance requirements of our agreements with the Government of Madagascar, our lenders, and other stakeholders. We are also committed to several voluntary measures that go beyond our legal obligations.

Mandatory Compliance

Law on Large Scale Mining Investments (*Loi sur les Grands Investissements Miniers, LGIM*) – Madagascar’s LGIM establishes the legal framework for developing and operating large-scale mining projects in the country. Ambatovy was certified under the LGIM in 2007. Under the LGIM, we are required to report annually to the Government on a range of sustainability issues, such as local employment, local content, environment measures, and community activities.

Decree on Rendering Investments Compatible with the Environment (*Décret sur la Mise en Compatibilité des Investissements avec l’Environnement, MECIE*) – The MECIE is a national decree that regulates environmental compliance for investment projects in Madagascar. Ambatovy received our environmental permit from the Malagasy authorities in December 2006, six months after filing our Environmental and Social Impact Assessment (ESIA). Following the ESIA, Ambatovy developed an Environmental and Social Development Management Plan (PGEDS), which provides the framework to ensure all issues identified during the ESIA are addressed through appropriate mitigation and follow-up actions. We submit annual reports to the ONE on our progress against the PGEDS, and ONE officials conduct regular site visits to review our work.

International Finance Corporation (IFC) Performance Standards – The IFC Performance Standards are an international benchmark for identifying and managing environmental and social risks; they have been adopted by many companies and organizations as a key component of their environmental and social risk management. Our US \$2.1 billion project financing agreement requires adherence to IFC Performance Standards on environment, labor, and social aspects for a major investment project. Our work is closely monitored and regularly reviewed by Independent Engineers sent by our lenders to ensure compliance with these standards.

Equator Principles – The Equator Principles are voluntary standards for banking institutions; they have greatly increased the attention and focus on environmental and social/community standards, accountability and responsibility. Since some of Ambatovy’s lending institutions are Equator Principles Financial Institutions (EPFIs), our financing agreements require that we uphold these principles. EPFIs pledge to consider social and environmental criteria in large-scale projects they finance and to abstain from financing loans where borrowers are unwilling or unable to comply with these criteria.

Voluntary Commitments

Voluntary Principles on Security and Human Rights (VPSHR) – Established in 2000, the VPSHR are a set of principles designed to guide companies in the extractive sector in maintaining the safety and security of their operations within an operating framework that ensures respect for human rights and fundamental freedoms. The duty to protect human rights rests with governments, but other actors – including businesses – also have a responsibility to respect human rights. Extractive industry companies, such as Ambatovy, have a unique opportunity to have a positive impact on peace and stability, and we are continuously engaging with local, national and international entities to educate and raise awareness for the promotion of human rights. The VPSHR are embedded in Ambatovy’s Security Policy and, in order to reinforce shared commitments to the Principles, Ambatovy has developed relationships and agreements with national ministries responsible for security that establish clear expectations for public security forces and Ambatovy under the VPSHR.

Extractive Industries Transparency Initiative (EITI) – The EITI is a global standard for the good governance of oil, gas and mineral resources. It seeks to address the key governance issues in the extractive sector and to foster transparency along the extractive industry value chain – from the point of extraction, to payments to the government, to production levels, to contributions to the economy and community investments. Since Madagascar became an EITI candidate country in February 2008, Ambatovy has been a strong supporter of the EITI process and an active member of the Multi-Stakeholder Group (known as the National Committee in Madagascar), comprised of representatives from government, extractive industry companies, and civil society. Each year, Ambatovy participates in Madagascar’s EITI reconciliation report.

International Standard ISO 9001 – ISO 9001 certification is based on quality management principles, including strong customer focus, motivation and commitment of Senior Management, the use of a process and risk-based approach to managing the business, and continuous improvement. It confirms the ability of Ambatovy to provide goods and services meeting the needs of our clients, and the conformity of our products with international market requirements. For example, it is needed to meet the requirements of the London Metal Exchange (LME). In 2014, we received our ISO certification for Refining, Analytical Services and Shipping of Nickel, Cobalt, and Ammonium Sulphate products by AFNOR (the Association Française de Normalisation), the certification and standardization body. In February 2017, our certification was renewed, under the new and more stringent 2015 version of the ISO 9001 standard. In 2023, Ambatovy successfully renewed its ISO 9001 certification.

International Standards ISO 14001 and ISO 45001 – ISO 14001 and ISO 45001 certifications are internationally recognized standards for environmental management and occupational

health and safety, respectively. In 2023, Ambatovy successfully attained ISO 14001 certification for its environmental management system at the Plant Site and ISO 45001 for its health and safety management system. This achievement underscores Ambatovy's dedication to implementing sustainable practices and fostering a culture of health, safety, and environmental responsibility across its operations.

International Council on Mining and Metals (ICMM) – The ICMM is an organization established in 2001 to act as a catalyst for performance improvement in the mining and metals industry. The ICMM brings together mining and metals companies with national and regional mining associations and global commodity associations. Ambatovy endeavors to apply relevant ICMM principles and has integrated them, where applicable, into internal planning and strategies.

Global Industry Standard on Tailings Management (GISTM) – Established in 2020 by the International Council on Mining and Metals (ICMM), the United Nations Environment Programme (UNEP) and the Principles for Responsible Investment (PRI), the GISTM sets a precedent for the safer management of tailings facilities, towards the goal of zero harm to people and the environment. To be compliant, companies must adopt specified measures to prevent the catastrophic failure of tailings facilities and implement best practices in planning, design, construction,

operation, maintenance, monitoring, closure and post closure activities. While Ambatovy is not a member of the ICMM, we are fully committed to implementing best industry practices. By December 2023, we achieved substantial compliance with the standard for our TMF and remain dedicated to achieving full compliance.

Responsible Minerals Initiative (RMI) – Founded in 2008 by members of the Responsible Business Alliance and the Global e-Sustainability Initiative, the Responsible Minerals Initiative (RMI) is one of the most utilized and respected resources for companies from a range of industries addressing responsible mineral sourcing issues in their supply chains. The RMI's flagship Responsible Minerals Assurance Process (RMAP) offers companies and their suppliers an independent, third-party audit that determines which smelters and refiners can be verified as having systems in place to responsibly source minerals in line with current global standards, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act. More than 400 companies and associations across more than ten industries participate in the RMI today. Ambatovy began our engagement with the RMI in 2021 and is proud to align with the RMI's rigorous standards, contributing to the global effort to ensure responsible mineral supply chains.

Appendix 4: Social Investment Fund (SIF)

In 2012, Ambatovy, in partnership with the Government of Madagascar, established the Social Investment Fund (SIF), allocating a total of US \$25 million to support sustainable social and infrastructure development for local communities. Projects were identified through inclusive engagement with Malagasy authorities and local stakeholders and were executed in accordance with Ambatovy's procurement and purchasing policies.

As of December 2024, all 17 projects initiated under this phase have been completed or closed, marking the successful delivery of this set of investments. These projects include:

- The rehabilitation of the century-old *Bazary Be* market in Toamasina (completed in 2014).
- The destruction of the Zeren ammonia stock, which was stored in deteriorating pressure vessels and posed a serious safety hazard in Toamasina (completed in 2014).
- The establishment of the Harenasoa Poultry Project, a social business in the form of an integrated poultry farm (completed in 2016).
- Support for JIRAMA in Toamasina, the national water and energy provider, through the donation of two generators producing 12.6 megawatts of power to support electricity supply in Toamasina (completed in 2016).
- Provision of equipment and two fire trucks to the Toamasina fire brigade (completed in 2016).
- The rehabilitation of the Technical and Vocational High School in Toamasina (completed in 2016).
- The rehabilitation of road infrastructure in Ambatondrazaka, the capital of the Alaotra Mangoro Region (completed in 2016).
- The creation of a Civil Protection Unit in Toamasina to strengthen the city's emergency response capacities, including the provision of radios for improved coordination among security services (completed in 2016).
- The construction of a new market facility in Moramanga (completed in 2017).
- The rehabilitation of the Brickaville market (construction completed in 2017; final handover to local authorities in 2019).
- The rehabilitation of the Moramanga trial court building (completed; final handover to local authorities in 2019).
- The provision of two ambulances for Moramanga (completed; handover in 2020).
- The rehabilitation/construction of small-scale infrastructure in Toamasina (completed in 2021).
- Support for the establishment of a mechanism for the good governance of royalties, *Tsara Tantana*, and for the accompaniment and capacity building of communes impacted by our operations, including handover of community development plans for communes (completed in 2023).
- Support for the collection and recycling of domestic waste in Moramanga through the "Moramadio" waste management project (suspended).⁵
- Support for the collection and recycling of domestic waste in Toamasina through the "Tamadio" waste management project (suspended).
- The establishment of a state-of-the-art environmental laboratory for the National Office for the Environment (*Office National de l'Environnement – ONE*) in Toamasina with construction completed in 2022 and final delivery of specialized equipment in 2024, to enhance ONE's analytical capabilities (completed 2024).

⁵"Moramadio" is the combination of two words "Moramanga" and "madio" which is Malagasy for "clean"; similarly for "Tamadio" in the case of the waste management project in Toamasina (Tamatave).

Appendix 5: Priority Species

These priority species are listed by the International Union for Conservation of Nature (IUCN) as Endangered (EN), Critically Endangered (CR), Evolutionary Significant Units (ESU) or Species of Concern (SOC), and are endemic at the national, regional or local level within our conservation and intervention areas.

LEMURS		
NAME	STATUS	LOCATIONS
<i>Daubentonia madagascariensis</i>	EN	Mine footprint, Mine conservation zone, Pipeline, Ankerana, CFAM, Torotorofotsy
<i>Indri indri</i>	CR	Mine footprint, Mine conservation zone, Pipeline, Ankerana, CFAM, Torotorofotsy
<i>Propithecus diadema</i>	CR	Mine footprint, Mine conservation zone, Pipeline, Ankerana, CFAM, Torotorofotsy
<i>Prolemur simus</i>	CR	CFAM, Torotorofotsy
<i>Varecia variegata</i>	CR	Ankerana, CFAM

OTHER MAMMALS		
NAME	STATUS	LOCATIONS
<i>Microgale jobihely</i>	EN	Mine footprint, Mine conservation zone, CFAM

BIRDS		
NAME	STATUS	LOCATIONS
<i>Anas melleri</i>	EN	Mine footprint, Torotorofotsy
<i>Ardea humbloti</i>	EN	Mine footprint, Torotorofotsy
<i>Ardeola idae</i>	EN	Torotorofotsy
<i>Sarothrura watersi</i>	EN	Torotorofotsy
<i>Tachybaptus pelzelinii</i>	EN	Mine footprint
<i>Circus macroscleles</i>	EN	Torotorofotsy

AMPHIBIANS		
NAME	STATUS	LOCATIONS
<i>Mantella aurantiaca</i>	CR	Mine footprint, Mine conservation zone, Pipeline, CFAM, Torotorofotsy
<i>Boophis boehmei</i>	EN	Mine footprint, Mine conservation zone, Pipeline, Ankerana, CFAM, Torotofotsy
<i>Boophis feonnyala</i>	EN	Mine footprint
<i>Gephyromantis eiselti</i>	EN	Mine footprint, Mine conservation zone
<i>Gephyromantis thelenae</i>	EN	Mine footprint, Mine conservation zone, Ankerana
<i>Mantidactylus albobrenatus</i>	EN	Mine conservation zone, Ankerana
<i>Plethodontohyla guentheri</i>	EN	Mine conservation zone
<i>Rhombophryne kibomena</i>	EN	Mine footprint, Mine conservation zone, Ankerana, CFAM, Torotorofotsy
<i>Cophyla mavomavo</i>	EN	Mine footprint, Mine conservation zone

REPTILES		
NAME	STATUS	LOCATIONS
<i>Brookesia ramanantsoai</i>	EN	Mine footprint, Mine conservation zone, CFAM
<i>Calumma furcifer</i>	EN	Pipeline, Ankerana
<i>Calumma gallus</i>	EN	Pipeline, Ankerana
<i>Phelsuma flavigularis</i>	EN	Pipeline
<i>Phelsuma pronki</i>	CR	Mine footprint, Mine conservation zone
<i>Uroplatus pietschmanni</i>	EN	Mine footprint, Mine conservation zone
<i>Brookesia minima</i>	EN	Pipeline

FISH		
NAME	STATUS	LOCATIONS
<i>Ratsirakia Mangoro</i>	ESU	Mine footprint, Mine conservation zone
<i>Ratsirakia Sakalava</i>	ESU	Mine footprint, Mine conservation zone
<i>Ratsirakia Vondronina/Rianila</i>	ESU	Mine footprint, Mine conservation zone
<i>Rheocles Mangoro</i>	ESU	Mine footprint, Mine conservation zone
<i>Rheocles Vondronina</i>	ESU	Mine footprint, Mine conservation zone

PLANTS		
NAME	STATUS	LOCATIONS
<i>Dicoryphe sp.nov</i> (Non Orchid)	SOC	Mine footprint
<i>Helichrysum sp. nov. aff.</i> <i>Ambondrombeense</i> (Non Orchid)	SOC	Mine footprint
<i>Hyperacanthus sp. nov. A</i> (<i>'mangoroensis'</i> ined.) (Non Orchid)	SOC	Mine footprint
<i>Aloe leandrii</i> (Non Orchid)	CR	Mine footprint, Mine conservation zone
<i>Ellipanthus razanatsimae</i> (Non Orchid)	CR	Mine foot print
<i>Seringia macrantha</i> (Non Orchid)	CR	Mine footprint
<i>Bulbophyllum uroplatoides</i> (Orchid)	CR	Mine footprint
<i>Macaranga racemosa</i> (Non Orchid)	CR	Mine footprint, Mine conservation zone, Ankerana, CFAM
<i>Angraecum letouzeyi</i> (Orchid)	EN	Mine footprint
<i>Aerangis monantha</i> (Orchid)	EN	Mine footprint
<i>Aeranthes polyanthemus</i> (Orchid)	EN	Mine footprint
<i>Angraecum alleizettei</i> (Orchid)	EN	Mine footprint

PLANTS		
NAME	STATUS	LOCATIONS
<i>Angraecum ankeranense</i> (Orchid)	EN	Mine footprint, Mine conservation zone
<i>Angraecum bicallosum</i> (Orchid)	EN	Mine footprint
<i>Angraecum obesum</i> (Orchid)	EN	Mine footprint
<i>Angraecum pseudodidieri</i> (Orchid)	EN	Mine footprint
<i>Angraecum triangulifolium</i> (Orchid)	EN	Mine footprint
<i>Angraecum scroticalcar</i> (Orchid)	EN	Mine footprint
<i>Benthamia nigrescens</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum briophyllum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum callosum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum cardiobulbum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum debile</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum horizontale</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum petrae</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum sulfureum</i> (Orchid)	EN	Mine footprint, Mine conservation zone
<i>Cryptocarya fulva</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Cryptocarya myristicoides/ multiflora</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Cryptopus paniculatus</i> (Orchid)	EN	Mine footprint, Mine conservation zone
<i>Cymbidiella pardalina</i> (Orchid)	EN	Mine footprint
<i>Cynorkis aurantiaca</i> (Orchid)	EN	Mine footprint
<i>Dombeya biumbellata</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone, CFAM
<i>Gastrorchis tuberculosa</i> (Orchid)	EN	Mine footprint
<i>Lemurella papillosa</i> (Orchid)	EN	Mine footprint
<i>Liparis ambohimangana</i> (Orchid)	EN	Mine footprint
<i>Liparis warpuri</i> (Orchid)	EN	Mine footprint, Mine conservation zone

PLANTS		
NAME	STATUS	LOCATIONS
<i>Aspidostemon conoideus</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Coffea liaudii</i> (Non Orchid)	EN	Mine footprint
<i>Cynanchum moramangense</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Eugenia urschiana</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Eugenia wilsoniana</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Melicope discolor</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Melittacanthus divaricatus</i> (Non Orchid)	EN	Mine footprint
<i>Pandanus analamazaotrensis</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Phyllanthus ambatovolana</i> (Non Orchid)	EN	Mine footprint
<i>Psorospermum nervosum</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Baroniella acuminata</i> (Non Orchid)	EN	Mine footprint
<i>Breonia louvelii</i> (Non Orchid)	EN	Mine footprint
<i>Canarium moramangae</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Croton enigmaticus</i> (Non Orchid)	EN	Mine footprint
<i>Croton ferricretus</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Croton humbertii</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Croton radiatus</i> (Non Orchid)	EN	Mine footprint
<i>Decaryochloa diadelpha</i> (Non Orchid)	EN	Mine footprint
<i>Gravesia tanalensis</i> (Non Orchid)	EN	Mine footprint
<i>Ivodea antilahimena</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Korthalsella taenioides</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Medinilla mandrakensis</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Noronhia cuspidata</i> (Non Orchid)	EN	Mine footprint
<i>Ochna thouvenotii</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Tina urschii</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone

PLANTS		
NAME	STATUS	LOCATIONS
<i>Exacum bulbiferum</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Psychotria moramangensis</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Psychotria trichantha</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Aeranthus antennophora</i> (Orchid)	EN	Mine footprint, Mine conservation zone
<i>Aeranthus neoperrieri</i> (Orchid)	EN	Mine footprint, Mine conservation zone
<i>Angraecum pinifolium</i> (Orchid)	EN	Mine footprint
<i>Beclardia grandiflora</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum amoenum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum auriflorum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum ciliatilabrum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum discilabium</i> (Orchid)	EN	Mine footprint, Torotorofotsy
<i>Bulbophyllum hapalanthos</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum imerinense</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum lakatoense</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum obtusatum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum rubiginosum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum septatum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum teretibulbum</i> (Orchid)	EN	Mine footprint
<i>Bulbophyllum toilliezeae</i> (Orchid)	EN	Mine footprint
<i>Cynorkis henrici</i> (Orchid)	EN	Mine footprint
<i>Goodyera perrieri</i> (Orchid)	EN	Mine footprint, CAZ
<i>Goodyera rosea</i> (Orchid)	EN	Mine footprint
<i>Jumellea brachycentra</i> (Orchid)	EN	Mine footprint
<i>Jumellea peyrotii</i> (Orchid)	EN	Mine footprint
<i>Pyrostria analamazaotrensensis</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone

PLANTS		
NAME	STATUS	LOCATIONS
<i>Stenandrium amoenum</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Syzygium lugubre</i> (Non Orchid)	EN	Mine footprint
<i>Syzygium onivense</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Scleria madagascariensis</i> (Non Orchid)	EN	Mine footprint, Mine conservation zone
<i>Pectineriella edmundi</i> (Orchid)	EN	Mine footprint
<i>Pectineriella scroticalcar</i> (Orchid)	EN	Mine footprint
<i>Pentopetia longipetala</i> (Non Orchid)	EN	Mine footprint
<i>Polystachya tsinjoarivensis</i> (Orchid)	EN	Mine footprint
<i>Vepris sclerophylla</i> (Non Orchid)	EN	Mine footprint
<i>Xylopiia flexuosa</i> (Non Orchid)	EN	Mine footprint

Appendix 6: Ambatovy Offset Sites

Offsets are the final step in the mitigation hierarchy, designed to compensate for any residual impacts on biodiversity that cannot be avoided, mitigated, minimized or restored. Given the large scope of our operations and in line with BBOP guidance and IFC Performance Standard 6, Ambatovy has developed a multi-faceted offset program comprising several sites and associated activities. Ambatovy's offsets include the Mine Conservation Forests, the Analamay-Mantadia Forest Corridor (CFAM), the Ankerana Forest and the Torotorofotsy Wetlands Ramsar Site. Combined, the forest land to be conserved within these areas comes to a total of almost 14,000 ha, or roughly nine times the size of the area disturbed through our mining activities.

Incorporated into the offset program is an awareness that sustainable forest management cannot be successful without the support and participation of local populations who depend on forests for their natural resources. Ambatovy promotes local stewardship by designating peripheral forest areas for community use. Through awareness campaigns and livelihood development initiatives, Ambatovy seeks to decrease economic reliance on forest resources and reorient local communities towards alternative income generating activities.

Mine Conservation Forests

Two parcels of azonal forest overlapping the ore body have been set aside and will not be mined, despite the valuable nickel lying beneath them. The combined area of these two parcels is approximately 300 ha. During the Environmental and Social Impact Assessment, these azonal forest habitats were identified as a rare habitat type compared to the more typical zonal forests of the Eastern Forest Corridor. In addition, we have 3,575 ha of transitional and zonal forests on-site dedicated to conservation. This conservation zone provides a buffer to receive fauna displaced by the Mine footprint and serves as a seed bank to facilitate ecological restoration of impacted areas. These forests are directly managed by Ambatovy.

Analamay-Mantadia Forest Corridor

The Analamay-Mantadia Forest Corridor (CFAM) is part of a proposed new protected area that will ensure habitat connectivity between existing conservation zones in

the region, including forests managed by Ambatovy, the Ankeniheny-Zahamena Corridor (CAZ), the Mantadia National Park, and the Torotorofotsy wetlands. Formal protection of this 9,640 ha corridor, (of which 3,490 ha is forested), will result in the creation of one of the largest continuous expanses of protected habitat in Madagascar – spanning over 450,000 ha – and home to several endangered species, including the critically endangered Diademed sifaka (*Propithecus diadema*).

Ambatovy continues to support the establishment of this new protected area. We also support patrolling activities carried out by our agents and local communities to minimize threats, pending the Government appointment of a site manager. Notably, the corridor protects a surviving population of the critically endangered Greater bamboo lemur (*Prolemur simus*), one of the rarest lemurs in Madagascar and listed among the world's 25 most endangered primates. Three COBAs are involved in the management of the CFAM and are supported by regional DREDD offices and local NGOs.

Ankerana Forest

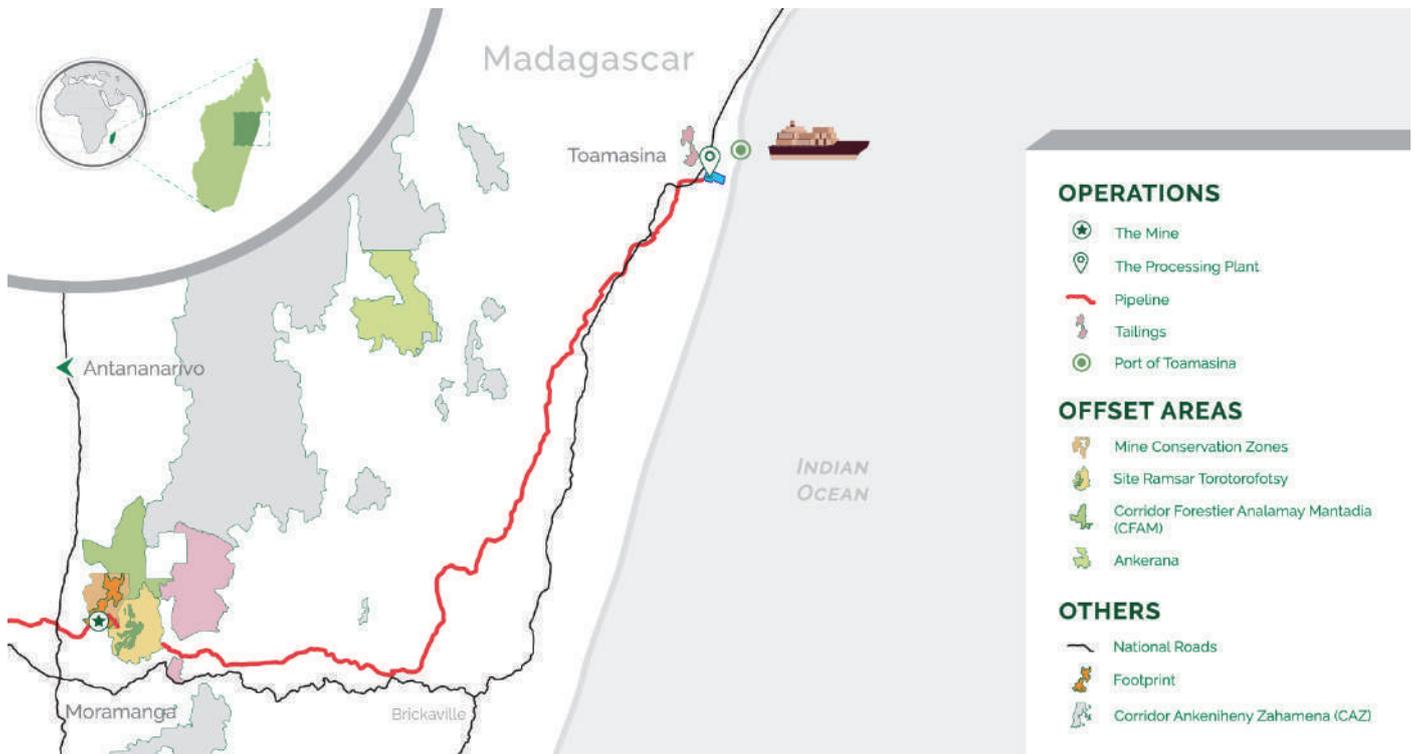
Ankerana was the first offset site identified by Ambatovy and remains the centerpiece of our Business and Biodiversity Offsets Program. It is an intact area of low-to-medium altitude forest lying 70 km to the northeast of the Mine and is linked to the Ankeniheny-Zahamena Corridor (CAZ). The area faces continuous pressure from slash-and-burn agriculture and poaching. However, since Ambatovy began working in Ankerana in 2011, the number of documented threats has significantly declined. The site covers a total area of approximately 8,000 ha, of which 4,879 are forested. Conservation International works alongside Ambatovy to manage this site, bringing valuable biodiversity expertise. Recently, conservation activities have expanded to include the forest corridor linking the Ankerana Massif to the CAZ, bringing the total surface area under management to over 14,740 ha. We collaborate with surrounding communities through education programs and support for the COBA organizations to ensure that our efforts to protect and maintain the delicate ecosystem continue beyond our operations. Several COBAs have been created to continue to strengthen the protection of the Ankerana Forest's resources. Income-generating activities (IGAs) such as fish farming, the cultivation of spices, coffee, vegetable crops and native seedlings production at village nurseries continue to improve local livelihoods.

Torotorofotsy Wetlands Ramsar Site

The Torotorofotsy Wetlands lie immediately to the east of the Mine and cover 10,064 ha of wetlands, forest and other habitats. Protected forests form 1,597 ha of this area. In 2006, Torotorofotsy was classified as a wetland of international importance under the Ramsar Convention on Wetlands. We support local community associations by reinforcing management capacity and sharing activities that help prevent marsh transformation and degradation. The day-to-day management of the Torotorofotsy Wetlands is managed by Asity Madagascar (an affiliate of BirdLife International, the world leader in bird conservation)

and supported by Ambatovy. Patrols conducted by Asity enable Ambatovy to gain an understanding of the range of biodiversity within the wetlands.

The success of Torotorofotsy as an offset site and the sustainability of its protection status will only happen with the participation of the communities surrounding it. Awareness campaigns are carried out and alternative income generating activities, to alleviate the community members' pressure on forest resources, continued throughout the year.



Appendix 7: GRI Content Index

Statement of Use	Ambatovy has reported the information cited in this GRI content index for the period from January 1, 2024 through December 31, 2024 with reference to the GRI Standards.
GRI 1 USED	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	NA

GRI Standard	Disclosure	Location	Omission
GRI 2: General Disclosures 2021	2-1 Organizational details	10, 12, 13, 16	
	2-2 Entities included in the organization’s sustainability reporting	10	
	2-3 Reporting period, frequency and contact point	10	
	2-4 Restatements of information	10	
	2-5 External assurance	10	
	2-6 Activities, value chain and other business relationships	13, 14, 24, 34	
	2-7 Employees	12, 25, 57-60	
	2-8 Workers who are not employees	12, 25, 57-60	
	2-9 Governance structure and composition	16	
	2-10 Nomination and selection of the highest governance body	16	
	2-11 Chair of the highest governance body	16	
	2-12 Role of the highest governance body in overseeing the management of impacts	16	
	2-13 Delegation of responsibility for managing impacts	16	
	2-14 Role of the highest governance body in sustainability reporting	10, 16	
	2-15 Conflicts of interest	16, 20, 27, 29, 31	
	2-16 Communication of critical concerns	21-22	
	2-17 Collective knowledge of the highest governance body	16	
	2-18 Evaluation of the performance of the highest governance body	16	
	2-19 Remuneration policies		Confidentiality Constraints
	2-20 Process to determine remuneration		
	2-21 Annual total compensation ratio		
	2-22 Statement on sustainable development strategy	8, 12, 17	
	2-23 Policy commitments	16, 17, 18-20, 27-31, 63-64	
	2-24 Embedding policy commitments	16, 17, 18-20, 27-31, 63-64	
	2-25 Processes to remediate negative impacts	27, 30, 31	
	2-26 Mechanisms for seeking advice and raising concerns	27, 30, 31	
	2-27 Compliance with laws and regulations	34	
	2-28 Membership associations	70, 71-72	
	2-29 Approach to stakeholder engagement	21-25	
	2-30 Collective bargaining agreements	60	

GRI Standard	Disclosure	Location	Omission
GRI 3: Material Topics 2021	3-1 Process to determine material topics	10, 22	
	3-2 List of material topics	82	
	3-3 Management of material topics	See topic-specific disclosures	
GRI 201: Economic Performance 2016	3-3 Management of material topics	33	
	201-1 Direct economic value generated and distributed	33-36	
	201-4 Financial assistance received from government		Not Applicable
GRI 203: Indirect Economic Impacts 2016	3-3 Management of material topics	33	
	203-1 Infrastructure investments and services supported	34-36	
	203-2 Significant indirect economic impacts	33, 34	
GRI 204: Procurement Practices 2016	3-3 Management of material topics	33, 34	
	204-1 Proportion of spending on local suppliers	34	
GRI 205: Anti-corruption 2016	3-3 Management of material topics	27, 29	
	205-1 Operations assessed for risks related to corruption	29, 35	
	205-2 Communication and training about anti-corruption policies and procedures	29	
GRI 303: Water and Effluents 2018	3-3 Management of material topics	54	
	303-3 Water withdrawal	54	
	303-4 Water discharge	53, 54	
	303-5 Water consumption	54	
GRI 304: Biodiversity 2016	3-3 Management of material topics	45-47	
	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	49-50	
	304-2 Significant impacts of activities, products and services on biodiversity	45-55	
	304-3 Habitats protected or restored	49-50	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	74-79	
GRI 305: Emissions 2016	3-3 Management of material topics	51	
	305-1 Direct (Scope 1) GHG emissions	54	
GRI 306: Waste 2020	3-3 Management of material topics	51	
	306-4 Waste diverted from disposal	52-54	
	306-5 Waste directed to disposal	52-54	
GRI 401: Employment 2016	3-3 Management of material topics	57-58	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	57	
GRI 403: Occupational Health and Safety 2018	3-3 Management of material topics	61	
	403-5 Worker training on occupational health and safety	59, 61-62	
	403-9 Work-related injuries	61	
GRI 404: Training and Education 2016	3-3 Management of material topics	57-58, 59	
	404-2 Programs for upgrading employee skills and transition assistance programs	59-60	
	404-3 Percentage of employees receiving regular performance and career development reviews	57-60	

GRI Standard	Disclosure	Location	Omission
GRI 408: Child Labor 2016	3-3 Management of material topics	27, 29-30	
	408-1 Operations and suppliers at significant risk for incidents of child labor	29	
GRI 409: Forced or Compulsory Labor 2016	3-3 Management of material topics	27	
	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	29	
GRI 413: Local Communities 2016	3-3 Management of material topics	37	
	413-1 Operations with local community engagement, impact assessments, and development programs	37-44	
	413-2 Operations with significant actual and potential negative impacts on local communities	37	
GRI 416: Customer Health and Safety 2016	3-3 Management of material topics	63-64	
	416-1 Assessment of the health and safety impacts of product and service categories	64-65	
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	65	

Appendix 8: Additional References

Please consult the following websites as additional references for information included in this report.

Ambatovy	www.ambatovy.com
Business and Biodiversity Offsets Program	https://www.forest-trends.org/bbop/
Children’s Rights and Business Principles	https://www.unicef.org
Cobalt Institute	www.cobaltinstitute.org
Equator Principles	http://equator-principles.com
Extractive Industries Transparency Initiative Madagascar	https://eiti.org/Madagascar
Global Industry Standard on Tailings Management	https://globaltailingsreview.org/global-industry-standard/
Global Reporting Initiative	https://www.globalreporting.org
International Council on Mining and Metals	www.icmm.com
International Finance Corporation’s Performance Standards	www.ifc.org/performancestandards
International Organization for Standardization (ISO)	https://www.iso.org
IUCN Red List of Threatened Species	http://www.iucnredlist.org/
London Metal Exchange, Responsible Sourcing	https://www.lme.com
Madagascar’s National Office for the Environment (ONE)	https://www.pnae.mg/
Nickel Institute	www.nickelinstitute.org
OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs)	https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance- Minerals-Edition3.pdf
Responsible Minerals Initiative, Responsible Minerals Assurance Process	https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/
Sustainable Development Goals	https://www.un.org/sustainabledevelopment/sustainable-development-goals/undp.org/publications/mapping-mining-sdgs-atlas
Voluntary Principles on Security and Human Rights	www.voluntaryprinciples.org

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