



**LOTUS**  
RESOURCES



# Sustainability Report 2024

Focused on our Future



## Forward Looking Statement

This Report contains 'forward-looking statements' ('Statements') based on the Company's expectations, estimates and projections as at its date. Statements can be identified by the use of words such as "seek", "anticipate", "believe", "plan", "estimate", "expect" and "intend" and statements that an event or result "may", "will", "should", "could" or "might" (and other similar expressions).

Statements and the information herein are subject to known and unknown risks and uncertainties that could cause outcomes different to those currently anticipated. This includes factors such as: economic, competitive, political and social uncertainties; valuations and regulatory changes and approval delays; the cost to procure and build plant and equipment (including delays etc); the ability of the Company to secure financing and the terms of the same; uranium market pricing and the ability of the Company to secure offtake.

Statements are based on estimates and opinions of management as at the date of this Report and this Report will not be updated even if circumstances, estimates or opinions change.

# Sustainability Snapshot



## ENVIRONMENTAL



### WATER

**Zero uncontrolled release of water**



### WASTE

**Zero non-compliance with waste or water licences**



### REHABILITATION

Donated **6,000 seedlings** to schools and local communities to **support local reforestation programs near Kayelekera**

**↑ 55%**  
in seeds planted

Planted **1,200 seedlings** in Kayelekera rehabilitation programs



### ENERGY

**↑ 37%**  
increase

**in total diesel consumption**  
(note Letlhakane has been added)

**↑ 13%**  
increase

**in Scope 1 emissions**



## SOCIAL



### SAFETY

**Zero fatalities**

**Zero lost time injuries**

**Increase in Kayelekera TRIFR (2 x MTIs)**

FY24: 2.27  
FY23: 0.89



### DIVERSITY

**20% women on Lotus' Board**

**↑ Increased female employment at Kayelekera**

**23% women in Letlhakane Team.**



**Increased female employment in the management team**

FY24: 19%  
FY23: 18%



### INFRASTRUCTURE

**Graded roads** following wet season to **restore access to schools** in Juma and Chiteka



**Resurfaced the Kayelekera village football pitch**

**Completed wall and floor repairs** at the Kayelekera **Medical Clinic** and **medical staff accommodation**

**Repaired the Sere River Bridge** - damaged following large rainfall events - **Engaged 17 local contractors** to complete the work.



### HEALTH

**Provided and maintained power and water for Kayelekera and the Wiliro Health Clinic**

Continued to **implement the mosquito abatement** program around Kayelekera, Sunfukwe and Chiteka



## EDUCATION

Continued to **sponsor 8 teachers and 10 high school students** at schools near Kayelekera

**Sponsored the math's and science awards** at the Shashe Secondary School (Letlhakane)

**Donated school furniture, uniforms and textbooks** to three schools (Letlhakane)



## GOVERNANCE



### ANTI-BRIBERY AND ANTI-CORRUPTION

**Zero incidents of corruption** ↓

Decrease  
FY24: 0 FY23: 1



### CYBERSECURITY

**1 cybersecurity incident was reported**



### ECONOMIC PERFORMANCE (SUPPLY CHAIN)

**↑ 63%** **US \$2.6m on local procurement** in Malawi and Botswana

**↑ 273 Local suppliers engaged**

FY24: 273 FY23: 118



### CORPORATE GOVERNANCE AND REGULATORY COMPLIANCE

**100% of security trained in human rights** at Kayelekera

**Zero fines or infringements**

**Zero non-compliance with laws or regulations**

# Contents

<b>SUSTAINABILITY SNAPSHOT</b> .....	<b>3</b>
<b>SUSTAINABILITY COMMITTEE CHAIR'S MESSAGE</b> .....	<b>5</b>
<b>ABOUT THIS REPORT</b> .....	<b>7</b>
<b>ABOUT LOTUS RESOURCES</b> .....	<b>8</b>
<b>ABOUT OUR PEOPLE</b> .....	<b>10</b>
<b>POWERING A CLEAN ENERGY FUTURE</b> .....	<b>11</b>
<b>SUSTAINABILITY AT LOTUS</b> .....	<b>15</b>
<b>SUPPLY CHAIN</b> .....	<b>18</b>
<b>ENVIRONMENT</b> .....	<b>19</b>
Water Management.....	19
Asset Management, Including Ground Stability.....	22
Waste and Hazardous Materials.....	23
Climate Change and Energy Management.....	26
Catchment Management and Mine Rehabilitation.....	31
<b>SOCIAL</b> .....	<b>35</b>
Health, Safety and Radiation Management.....	35
Community Relations and Engagement.....	42
Labour Management and Employee Relations.....	48
Diversity and Equal Opportunity.....	50
<b>GOVERNANCE</b> .....	<b>52</b>
Corporate Governance, Legal, and Regulatory Compliance.....	52
Ethics, Human Rights, Anti-Bribery and Corruption.....	56
Economic Performance & Financial Management.....	58
Cyber Security and Data Management.....	60



Hybrid Power Strategy communality engagement meeting

# Sustainability Committee

## Chair's Message

On behalf of the Board of Directors for Lotus Resources Limited, it gives me great pleasure to share with you the fourth annual Sustainability Report published by Lotus. This Report describes our key sustainability achievements from FY24 along with our continued commitment to addressing material sustainability risks and opportunities for our business and the communities where we operate. We are proud of our achievements and developments in this area, and we are pleased to outline them for you in this report.

Lotus' Board acknowledges the urgency of addressing climate change and the necessity for radical transformation to mitigate its effects and reduce emissions. We firmly believe that uranium plays a crucial role in the world's transition towards a net-zero future.

Nuclear power has avoided over 70 Gt of CO<sub>2</sub> emissions over the past 50 years, nearly equal to 2 years of global energy-related CO<sub>2</sub> emissions<sup>1</sup>. A significant increase in uranium production is needed to support the transition to net zero by increasing feedstock for nuclear energy generation and the demand for uranium is expected to grow 127% by 2030, and 200% by 2040<sup>2</sup>.

During FY24, Lotus has made significant progress in advancing the Kayelekera Uranium Project in Malawi towards the restart of production with the signing of the Mine Development Agreement by the Government of Malawi. The agreement provides for a long-term stable fiscal regime for the Project, in addition to specifying legal protections and non-fiscal government support, providing confidence to our investors.

We also completed the acquisition of the Letlhakane Uranium Project in Botswana, significantly growing our uranium resources and increasing the longevity of our ability to supply uranium to contribute to the global feedstock for nuclear energy generation.

At Lotus, we are determined to be a leader in sustainability. During FY24, we continued to develop our sustainability strategy and report on our contribution towards achieving our United Nations (UN) Sustainable Development Goals (SDGs) targets. We also continued to improve our reporting standard and have prepared this Sustainability Report with reference to the 2021 Global Reporting Initiative Sustainability Reporting Standard (GRI Standards) incorporating the new Mining Standards where possible.

### CLIMATE CHANGE AND ENERGY

In line with global expectations, we are continuing to develop our climate mitigation strategy for the recommencement of mining at Kayelekera. This Sustainability Report provides an update of our transition from aligning with the Task Force on Climate-related Financial Disclosures (TCFD) reporting framework and our progress towards reporting against Australia's new climate legislation and the Australian Sustainability Reporting Standards (ASRS).

A key part of our climate mitigation strategy is the development and implementation of the Hybrid Power Strategy for the recommencement of mining at Kayelekera. During the reporting period, we continued to progress the strategy, by liaising with the Electricity Supply Corporation of Malawi (ESCOM) and have developed a technical and commercial strategy to connect Kayelekera with the national power grid which is predominantly powered by hydropower. The powerline route has been selected to follow the road network and traverses near several villages. These villages are not currently connected to an electricity network. By installing the powerline using this route, it will provide the main power infrastructure to the area and significantly reduce the costs and resources for the villages to connect to the powerline in the future and bring electricity to their homes.

<sup>1</sup> <https://www.iaea.org/sites/default/files/21/10/nuclear-energy-for-a-net-zero-world.pdf>

<sup>2</sup> <https://world-nuclear.org/our-association/publications/global-trends-reports/nuclear-fuel-report>

## Sustainability Committee Chair's Message

### HEALTH AND SAFETY

The safety of our people is paramount, and we have an ongoing focus on training and safety. In FY24, we inducted the Letlhakane Team and rolled out training to support the exploration drilling program which commenced in May 2024. Kayelekera continued to induct new workers and implement training for hazard identification, risk assessment, working at heights, isolation and lock-out and confined spaces. Disappointing however, two medically treated injuries (MTI) were reported at Kayelekera, increasing the Total Recordable Injury Frequency Rate, from 0.89 in FY23 to 2.27 in FY24. These incidents were investigated, and mitigation measures have been implemented to prevent reoccurrence.

### CYBERSECURITY

Cybersecurity is critical in the world today as a cyberattack can disrupt business operations, causing downtime and loss of productivity. At Lotus, we take a continuous improvement approach to managing cybersecurity risks and have implemented a number of procedures to help encourage cybersecurity protection within the Company. During FY24, we experienced one cybersecurity incident. We are pleased to share that there was no loss of sensitive information.

### COMMUNITY INVESTMENT

People are our priority. We have focused on supporting the local communities surrounding the Kayelekera mine with health, education, and reforestation and have commenced our community investment program at Letlhakane. Some of our initiatives at Kayelekera included infrastructure maintenance and repairs to the Sere Bridge, Juma Village access road, Kayelekera football pitch, and walls and floors of the Kayelekera Health Centre and medical staff accommodation.

Supporting our local communities with work and business opportunities is a priority for Lotus. During the reporting period, we are pleased to report that we engaged 369 local contractors to undertake short term contract work at Kayelekera. This is a significant increase compared to FY23. Additionally, we contributed \$2.6 million in procurement from local business in Malawi and Botswana.

### ESG RATINGS

Lotus participated in its first S&P Global Corporate Sustainability Assessment (CSA) and achieved an S&P Global ESG Score of 37 out of 100, which placed the Company in the 64th percentile in the MNX Metals & Mining industry in February 2024. This is a great outcome, and we look forward to improving our score in FY25.



**Ms. Dixie Marshall**  
Non-Executive Director | ESG Committee Chair

On behalf of the Board, I would like to take this opportunity to sincerely thank Lotus' staff and contractors who have helped us deliver on our sustainability objectives and targets and extend my thanks to all of our stakeholders and shareholders for your ongoing support.

Lotus remains committed to continual improvement of its sustainability performance to ensure that we minimise our environmental impacts, support our communities, and increase the efficiency and safety of our operations.

# About This Report

This Sustainability Report, approved for release by Lotus Resources Limited's (Lotus) Board of Directors, covers the financial year from 1 July 2023 to 30 June 2024 (FY24). This report is Lotus' fourth annual Sustainability Report and is an important part of our annual corporate reporting suite. It outlines our approach to creating sustainable value for our stakeholders, and provides a summary of our environmental, social, and governance (ESG) management systems and performance.

This follows the release of our FY24 Annual Report, which includes our Directors Report, Remuneration Report, and Financial Statements. The Remuneration Report and Financial Statements have been independently audited and the FY24 Sustainability Report aligns with this reporting period. No external assurance has been sought specifically for the FY24 Sustainability Report.

The currency used throughout this report is US Dollars (US\$), unless otherwise stated.

Lotus is a member of Malawi Chamber of Mines.

## SCOPE

This report covers Lotus and its subsidiaries. Lotus owns an 85% interest in the Kayelekera Uranium Project, in Malawi via a subsidiary, Lotus (Africa) Limited with the remaining 15% held by the Malawi government, and 100% of the Letlhakane Uranium Project in Botswana via a subsidiary, Lotus Marula Pty Ltd. For the purposes of this report, "Lotus" is used to refer to Lotus Resources Limited and its subsidiaries.

## ESG REPORTING FRAMEWORKS

This report details our corporate ESG activities, and the work undertaken at our Kayelekera Uranium Project in Malawi, and the Letlhakane Uranium Project in Botswana. This report has been prepared with reference to the 2021 Global Reporting Initiative Sustainability Reporting Standard (GRI Standards), incorporating relevant information and data that meets the framework's requirements. We have also set targets aligning with the United Nations (UN) Sustainable Development Goals (SDGs) and have reported on our progress towards these goals. We review and update these targets annually, to drive continuous improvement in our performance.

Lotus is continuing to develop its climate mitigation strategy for the recommencement of production at Kayelekera. This report provides an update of our progress towards preparing to report our climate related financial disclosures in accordance with the Australian Sustainability Reporting Standards (ASRS).

We are committed to communicating openly with our stakeholders, and we welcome your feedback. If you would like to provide feedback, please send your comments to:

**Amy Sullivan, ESG Manager**  
info@lotusresources.com.au  
or contact +61 (8) 9200 3427.

## Our Voluntary Sustainability Reporting Initiatives



SUSTAINABLE  
DEVELOPMENT  
GOALS



Kayelekera Mine camp and admin buildings

# About Lotus Resources

**Lotus Resources Limited (Lotus) is a leading ASX listed (Code: LOT) uranium developer headquartered in Perth, Australia, with significant scale and resources.**

Lotus owns an 85% interest in the Kayelekera Uranium Project (Kayelekera) in Malawi, and 100% of the Letlhakane Uranium Project (Letlhakane) in Botswana. The acquisition of Letlhakane is a major step towards our goal of creating a southern African uranium player with significant scale, at a time when the generation of low carbon emission electricity and energy security are becoming ever more important globally to governments, industries and the public consumer.

We are dedicated to delivering value to our stakeholders, including our shareholders, customers, and local communities. Our commitment includes collaborating with communities to ensure we provide a meaningful and enduring impact.

## KAYELEKERA URANIUM MINE

Kayelekera is located in the Karonga District of northern Malawi, 650 km north of the national capital of Lilongwe and 24 km west of the town of Karonga.

Lotus holds one mining licence for the Kayelekera mine and five exploration tenements, two that surround the mine and three that are located to the south, two of which host the Livingstonia Uranium Prospect. These tenements are being investigated for their potential to supply additional uranium as future satellite operations.

Lotus' Milenje Rare Earth Project is hosted within the Kayelekera mining licence. Exploration activities have identified that the rare earth grades offer promising potential for a future deposit to be defined.

Kayelekera has been in care and maintenance (C&M) since 2014 due to a falling uranium price and unfavourable market conditions. The uranium market has recently taken a positive turn and has seen a significant increase in spot prices through the end of 2023 and into 2024 as a result of increasing demand.

Lotus is focused on recommencing operations at Kayelekera and achieved a major milestone for the project by finalising the Mine Development Agreement with the Government of Malawi in July 2024.

The focus is now on completing the refurbishment of the processing plant to enable mining and processing to recommence.



# About Lotus Resources

## LETLHAKANE URANIUM PROJECT

In November 2023, Lotus completed the acquisition of the Letlhakane Project, located approximately 90 km south of Francistown, the second largest town in Botswana.

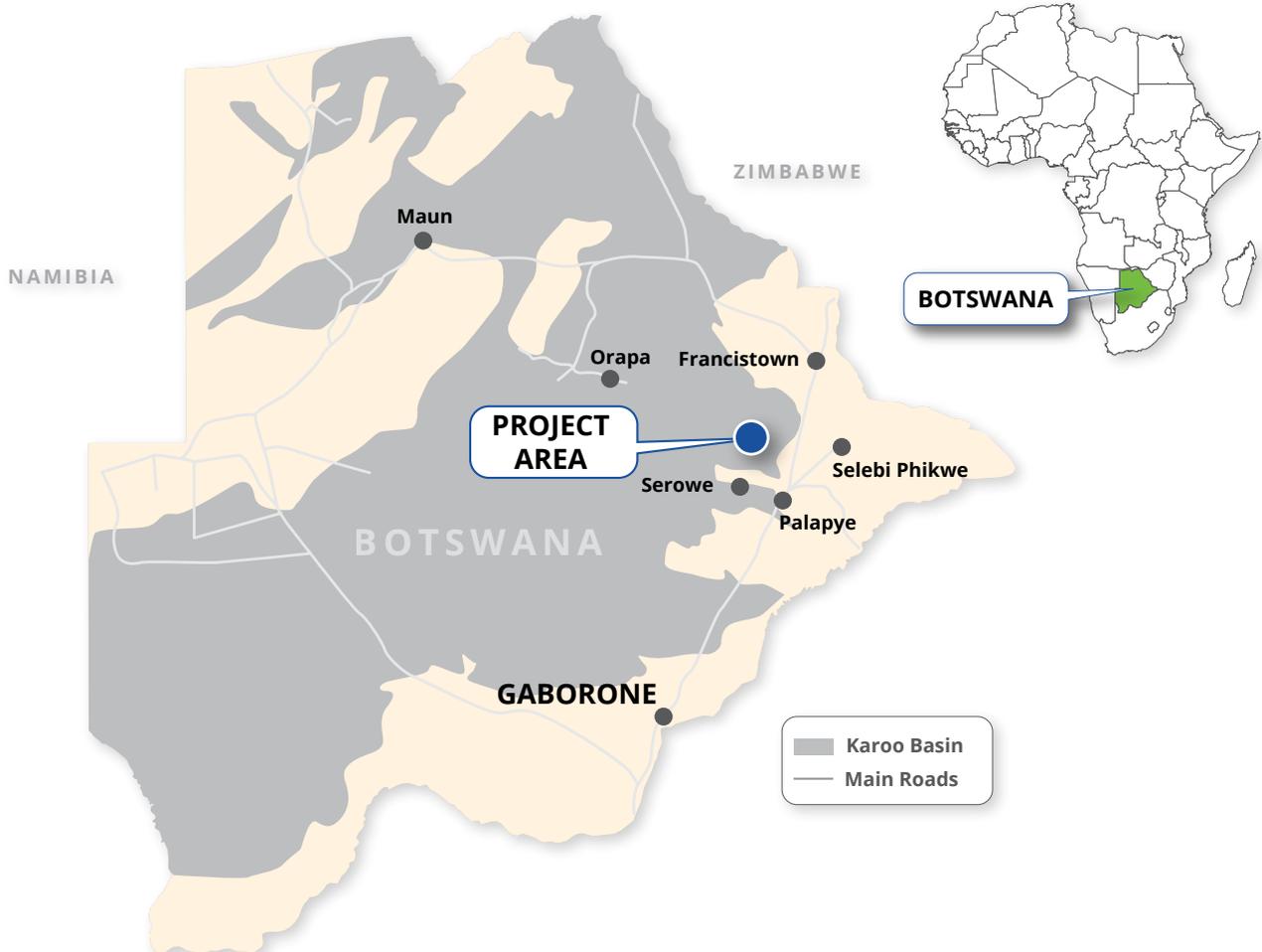
Botswana is recognised as a world-class mining jurisdiction with mining having dominated the economy since the 1970s and has been consistently in the top ranked jurisdictions in the Fraser Institute Perceptions Index.

Letlhakane is one of the world’s largest undeveloped uranium deposits. Letlhakane’s mining licence (ML2016/16L) has been in place since 2016. The Project also has provisional surface rights, water abstraction rights and rights to install a borefield. Lotus also holds a Prospecting Licence (PL2482/2023) located adjacent to the eastern edge of the ML, covering 11,966 ha.

The project is located close to high quality infrastructure with the A1 sealed highway,

railway and powerline running past the mining licence boundary. All of which make significant contributions to keeping the capital cost of future developments low.

During FY24, Letlhakane commenced a 15,000 m reverse circulation (RC) drilling program, targeted at upgrading the projects inferred mineral resources to indicated or measured. A Scoping Study is also underway which is focused on identifying an optimal production rate and development pathway to commence mining.



# About Our People

**At Lotus, we recognise that we are part of a global community. As part of this community, we are committed to operating our business in a sustainable manner that ensures our people are safe and well-supported, local communities prosper and the environment is well cared for so that it benefits future generations.**

Our people bring a wealth of mining and exploration experience from a diverse range of global backgrounds which gives us the great benefit of sharing our knowledge and learnings with other teams across our projects.

During FY24, we employed 34 people on a full-time basis, 27 people on short or long term contracts and 4 casual employees totalling 65 employees. At Kayelekera, we employed 19 people plus a supporting workforce of 369 people

hired through labour hire contractors from the local communities surrounding the project. At Letlhakane, we employed 39 people.

Our people are key to embedding sustainability throughout our business and the communities in which we operate. We continuously aim to enhance living standards through various support programs, fostering shared value, and creating lasting, positive impacts beyond the life of our projects.

**CEDRIC MPEDI External Affairs – Manager and ESG Champion**  
BSc (Geo & Env. Science), AdvDipPM, MBA

**“I believe that responsible mining can have a transformative impact on the region, and I am proud to contribute to this effort”  
– Cedric Mpedi**



Cedric has been working at the Letlhakane Project since 2009. He has over 20 years of experience in geosciences and has recently completed Master of Business Administration (MBA) from BA ISAGO University.

Cedric’s role includes managing relationships with key stakeholders such as government authorities, local communities, and industry partners.

Cedric is passionate about bridging the gap between technical project goals and

stakeholder needs. He enjoys collaborating with diverse groups to ensure that Lotus’ work not only delivers value to the company and meets regulatory standards, but also benefits the local communities. He is committed to promoting sustainable practices that drive long-term community development and environmental stewardship.

Cedric views the Letlhakane Project as vital to the local community, contributing to economic and social growth through job creation and local development opportunities.

**PACHARO NDOVI Safety, Health, and Radiation Coordinator and ESG Champion**  
DipDiagRadiog, BTech(DiagRadiog), MSc.

**“I take pride in knowing that my efforts contribute to creating a safer work environment where everyone can thrive and return home safely at the end of each day” – Pacharo Ndovi**



Pacharo has worked at the Kayelekera Mine since 2010, and recently received his Masters of Science in Occupational Safety and Health. He has over 13 years of experience in safety, health, and radiation management within the mining sector, and has a background in OH&S practices, implementing safety procedures, conducting risk assessments, ensuring regulatory compliance, and radiation

safety and monitoring, which is crucial for safeguarding personnel at a uranium mine. Lotus was proud to sponsor his tuition fees, accommodation, and equipment for his dissertation on the “Assessment of personal exposure to inhalable dust and its radiometric content in underground coal mines in Karonga District.”

# Powering a clean energy future

Climate change has emerged as one of the global community's most critical issues. The impact of climate change is being increasingly felt worldwide. In recent years, we've seen more frequent extreme weather events, rising global temperatures and ever-increasing spending on disaster recovery.

The United Nations (UN) Environment Programme's Emission Gap Report (2023) highlights that temperatures hit new highs, yet world fails to cut emissions (again).<sup>3</sup> This is reinforced by the global average temperature reaching a new high record on the 21 July 2024. Now the hottest day on record, according to the Copernicus Climate Change Service (C3S) data.<sup>4</sup>

The world is witnessing a disturbing acceleration in the number, speed and scale of broken climate records. In September 2023, global average temperatures were 1.8°C above pre-industrial levels.<sup>3</sup> These records were accompanied by devastating extreme events, which the Intergovernmental Panel on Climate Change (IPCC) has warned are merely the beginning. While the records do not mean that the world has exceeded the 1.5°C temperature limit specified in the Paris Agreement, they signal that we are getting closer.<sup>3</sup>

Urgent action is needed to limit global warming to 1.5°C above pre-industrial levels. While there is a growing coalition of countries that are committing to net zero emissions by 2050, greenhouse gas emissions must fall by 45% by 2030 and reach net zero by 2050 to keep global warming to no more than 1.5°C.

"The energy sector is the source of around three-quarters of carbon emissions today and is the key to avoiding the worst effects of climate change".<sup>5</sup> Clean-energy goals have been the focus of many global meetings, with policies like the Paris Agreement and the United Nations 24/7 Carbon-free Energy Compact aiming to accelerate the decarbonisation of the world's energy system.

Nuclear energy is one of the largest and most reliable sources of low-carbon electricity available and has the potential to provide an essential foundation for transitioning to net zero.



Transitioning to net-zero carbon emissions is one of the greatest challenges our world will face. It calls for a complete transformation of how the world operates.

Nuclear power has avoided over 70 Gt of CO<sub>2</sub> emissions over the past 50 years, nearly equal to 2 years of global energy-related CO<sub>2</sub> emissions.

- International Energy Agency

<sup>3</sup> Emissions Gap Report 2023

<sup>4</sup> New record daily global average temperature reached in July 2024 | Copernicus

<sup>5</sup> Climate Action Net Zero Coalition

# The Potential of Uranium

Uranium is a key energy contributor in the world’s transition towards a net zero future. A significant increase in uranium production is needed to support the transition to net zero by increasing feedstock for nuclear energy generation.

Uranium is the main fuel used by nuclear power plants. Uranium is a heavy metal which has been used as an abundant source of concentrated energy for over 60 years. Uranium is a common metal found in soils and rocks around the world and occurs in nature as two types of isotopes: uranium-235 and uranium-238. The isotope U-235 is important because in the right conditions it can readily be split, yielding large amounts of energy.

Fission is the process of splitting the uranium-235 atoms, and this process releases heat, radiation, and more neutrons, prompting further fission and creating a chain reaction. The heat (not the radiation), generated from this reaction is used to generate power, as it heats the steam that operates the turbines to generate electricity.

## Uranium is highly energy intensive.

**One uranium fuel tablet** (weighing 4.5g) produces energy equivalent to:



**480** cubic metres  
of natural gas



**one** tonne  
of coal

 = 

**One fuel rod** which weighs about a 1.5 kg carries as much energy as **120 tonnes of oil.**

Source: [Nuclears Stand Out Resilience in an Energy Crisis](#)

## NUCLEAR ENERGY

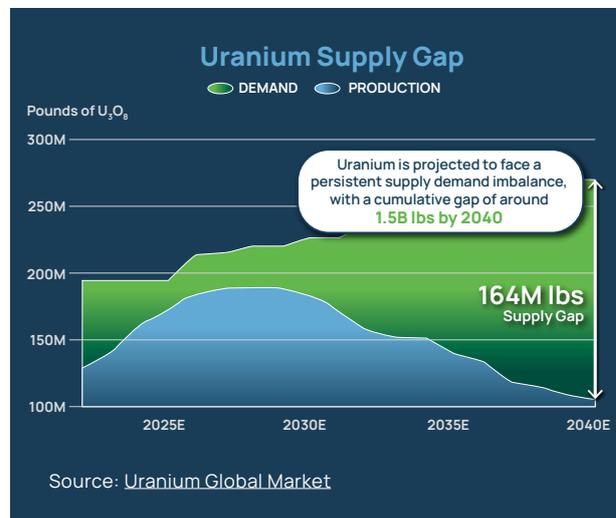
Nuclear power has a critical role to play and offers a viable solution for meeting low carbon energy goals. Nuclear reactors do not produce air pollutants such as nitrogen oxide (NO<sub>x</sub>), sulphur dioxide (SO<sub>2</sub>), or greenhouse gas emissions. It is a clean, low emission high intensity energy source.

Nuclear energy produces more electricity on less land than any other clean energy source and has the greatest resilience being the only form of clean energy that can supply baseload power around-the-clock, anytime day or night, is flexible, able to accommodate daily fluctuations in demand and provides energy security as a year supply of fuel can be stored onsite. Unlike intermittent sources, such as wind or solar, nuclear power can be supplied on demand and aligned with renewable energy deficits.

Uranium has the potential to create large amounts of carbon-free reliable power with a small environmental footprint and has been described by the International Energy Agency as an essential foundation in the transition to achieve the greenhouse gas reduction targets set by the Paris Agreement.



**The demand for uranium is expected to grow 127% by 2030, and 200% by 2040, as nuclear power increases - World Nuclear Association**



Once mining recommences at Kayelekera, Lotus plans to produce up to 2.4 Mlb U<sub>3</sub>O<sub>8</sub> per annum.<sup>6</sup> Using this production rate, the Kayelekera Mine can supply enough uranium to feed roughly five 1,400MW reactors each year, equating to approximately 60 million MWh per year. **This is enough to power 6 million homes.**

<sup>6</sup> The life-of-mine production contains approximately 4% from Inferred Mineral Resources contained in existing stockpiles. There is a low level of geological confidence associated with Inferred Mineral Resources and there is no certainty that further exploration work will result in the determination of Indicated Mineral Resources or that the production target itself will be realised.

# Global Growth of Nuclear Energy

**440** Operable Reactors  
396,269 MWe

**60** Reactors Under Construction  
64,159 MWe

**87** Reactors Planned  
90,000 MWe

Source: [Plan for New Reactors Worldwide](#)

## RECENT DEVELOPMENTS - COP28

Nuclear energy has made strides over the last five years, with major progress and development being supported across the globe. One of the landmark agreements expanding nuclear power took place at the United Nations Climate Change Conference (COP28), where the promotion of global efforts to accelerate zero- and low-emissions technologies, including nuclear, took place. 22 world leaders signed a declaration to implement efforts to triple nuclear energy by 2050.<sup>7</sup> This declaration is an important step towards achieving the 1.5C temperature limit of the Paris Agreement.

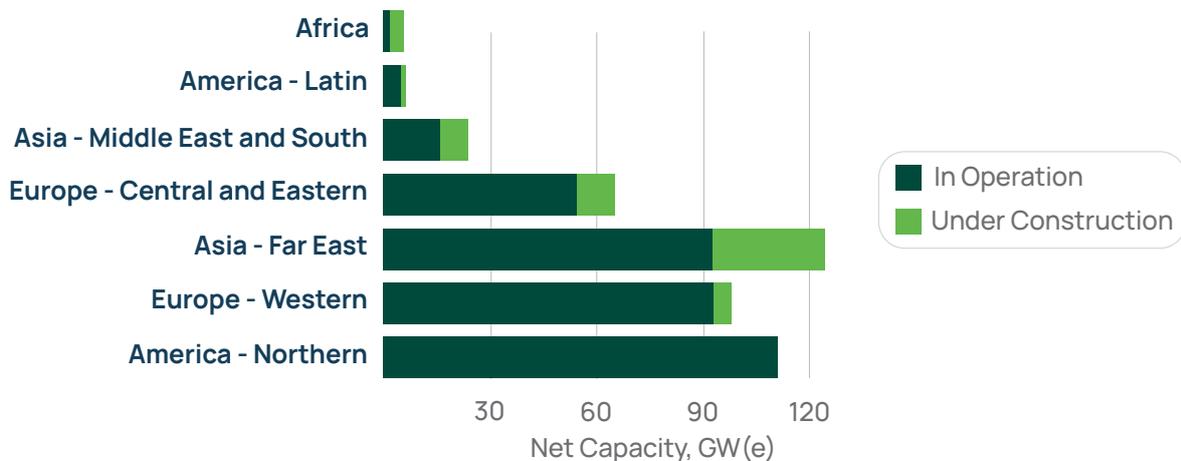
## LEGISLATIVE AND REGULATORY SUPPORT

Legislation concerning nuclear energy is also taking off, with the United States passing a bill (the *Atomic Energy Advancement Act*) in support of nuclear energy production in February 2024.<sup>8</sup> Nuclear energy was also included in the European Union's Taxonomy Regulation in 2021, and nuclear energy was further defined as a sustainable energy source in the Taxonomy Regulation in 2022.<sup>9</sup>

## INTERNATIONAL ATOMIC ENERGY AGENCY EVENTS

The Nuclear Energy Summit was pioneered and hosted by the International Atomic Energy Agency (IAEA) in March 2024, where world and sector leaders gathered to discuss nuclear power's role in decarbonisation and economic development. Participants, which included representatives from nuclear industry and non-governmental organisations, discussed international collaboration on nuclear energy and highlighted the importance of financing nuclear projects. At the summit, which has been described as the world's highest-level meeting on nuclear energy, the NGO Declaration on the Future of Nuclear Energy was signed, calling for coherent and accountable expansion of nuclear energy.<sup>10</sup> Nuclear energy was also formally recognised as a technology that can be utilised to achieve energy security and decarbonisation at the IAEA's 2024 Ministerial Meeting and 50th Anniversary event in February.<sup>11</sup>

## Regional Distribution of Nuclear Power



Source: [Power Reactor Information System](#)

<sup>7</sup> [Nuclear Power Finally Has Its Moment at UN Climate Summit](#)

<sup>8</sup> [The Atomic Energy Advancement Act Advances Nuclear](#)

<sup>9</sup> [EU Taxonomy: Complementary Climate Delegated Act to accelerate decarbonisation](#)

<sup>10</sup> [Nuclear Industry Welcomes Support of Countries at Brussels Nuclear Energy Summit 2024](#)

<sup>11</sup> [2024 IEA Ministerial Communiqué](#)

# Global Growth of Nuclear Energy

## GLOBAL PARTICIPATION

Approximately 30 countries are contemplating, planning, or beginning nuclear power programs, and an additional 20 countries have shown interest in nuclear power. Countries that previously stopped using nuclear energy have begun re-investigating it as an option to achieving net-zero commitments, including Italy, who established a 'National Platform for a Sustainable Nuclear Power' in 2021, 35 years after a referendum that ended their nuclear production.<sup>12</sup> Even oil-rich Saudi Arabia has begun investigating a vendor for the construction of their first commercial nuclear power plant.<sup>13</sup> International cooperation is also evident, with multiple countries collaborating with others to develop nuclear, including the USA and Bulgaria,<sup>14</sup> China and Hungary,<sup>15</sup> and Canada and South Korea.<sup>16</sup> More than 60 nuclear reactors are currently under construction across 16 countries, 87 are planned, and over 300 are proposed.<sup>17</sup>

## WORLD ENERGY CONGRESS 2024

The 26th World Energy Congress, 'Redesigning Energy for People and Planet', took place in April 2024 and saw leaders from across the globe come together and discuss the future of energy. The event included a panel session on nuclear, 'Leap of scale or faith: Realising the full potential of nuclear', where the critical location of nuclear energy within the energy transition was discussed. Leaders discussed the vitality of nuclear energy in reaching net-zero emissions by 2050 and in obtaining global energy security.<sup>18</sup>



<sup>12</sup> Italy could get 22% of electricity from nuclear by 2050.

<sup>13</sup> Nuclear Power in Saudi Arabia.

<sup>14</sup> The United States and Bulgaria Sign Agreement on Civil Nuclear Cooperation.

<sup>15</sup> Hungary and China sign nuclear energy cooperation agreement.

<sup>16</sup> Partnership for ARC-100 commercialisation.

<sup>17</sup> Plans for New Reactors Worldwide.

<sup>18</sup> WEC panelists welcome growth in support for nuclear power.

# Sustainability at Lotus

## LOTUS' VISION

“Lotus aspires to be a responsible uranium producer, building strong local communities, a safe and healthy work environment and making a positive contribution to a carbon free future”.

## LOTUS' VALUES



### We are Real

We act with honesty and integrity and don't greenwash



### We Care

We care about our people, our community, and our environment



### We are Disciplined

We do what we say we'll do



### We Achieve

We deliver on our commitments



### We are a Team

We support each other and work collaboratively

## Our values underpin our culture and are fundamental in setting and communicating our expectations across the organisation.

At Lotus, we are committed to conducting our business in a way that prioritises sustainability by implementing processes that provide a safe working environment for our people, protects the environment in which we operate and provides support for our communities to allow prosperity for future generations. Companies can be courageous and innovative in their approach to sustainability, and Lotus has both the opportunity and the capacity to be a key participant in this approach. We are committed to continuously improving the way we do business.

Lotus recognises there are additional obligations that comes with working in the uranium industry, and is committed to acting with integrity, honesty, and cultural sensitivity in all our dealings. Lotus' sustainable development program aims to achieve a balance between economic, environmental, and social needs, in all phases of its operation, and takes into consideration employees, communities, shareholders, and other stakeholders.

### ESG COMMITTEE

Lotus' ESG Committee was formed in FY22 to assist the Board to fulfil its responsibilities in relation to environmental, social, and governance matters. To drive accountability and responsibility for compliance with Lotus' sustainability strategy and the associated risks, policies, standards and procedures. As well as, to review and assess the effectiveness of the Company's governance program in ensuring compliance with relevant regulatory and legal requirements.

Lotus' ESG strategy is updated annually and is developed in consultation with Lotus' Management Team and is approved by the ESG Committee and the Board.

In FY24, the ESG Committee comprised of three Directors, supported by Lotus' ESG Manager and Company Secretary. The Committee meets quarterly and provides feedback to Lotus' Board on the Company's ESG strategy deliverables.

In August 2024, the ESG Committee was restructured to include two Directors, with Lotus' Chief Executive Officer, supported by Chief Operations Officer, ESG Manager and Company Secretary.

The Board's delegation of responsibility to the ESG Committee highlights that ESG is a priority for the business and ensures that sustainable practices are continued to be embedded into our operations. Refer to the [ESG Committee Charter](#) for further information.

### LOTUS' STAKEHOLDER ENGAGEMENT

Building strong, effective, and enduring relationships with our stakeholders is crucial to our approach to achieving social, environmental, and economic success. We engage regularly with our stakeholders through active and transparent communication, which fosters our relationships and enhances our social licence to operate.

This report provides a summary of our engagement, which is supported by communication throughout the year via media statements, company publications, our Annual General Meeting, our website and engagement with specific stakeholders. To ensure meaningful conversations and outcomes, the type and frequency of engagement depends on the stakeholder and the issues relevant to them.

## Stakeholder Engagement Summary

Stakeholders	Key interests and concerns	How we engaged	Related Material Topics
<b>Employees and Contractors</b> Lotus employees, and key contractors	<ul style="list-style-type: none"> <li>Corporate governance</li> <li>Implementing sustainable practices</li> <li>Remuneration and employee welfare</li> <li>Prioritising local procurement</li> <li>Community development programs for health and education</li> <li>Diversity and equal opportunity</li> <li>Water stewardship</li> <li>Ground stability</li> <li>Reforestation programs</li> </ul>	<ul style="list-style-type: none"> <li>ESG stakeholder survey</li> <li>Regular meetings</li> <li>Phone calls</li> <li>Emails</li> </ul>	<ul style="list-style-type: none"> <li>Corporate governance, legal, and regulatory compliance</li> <li>Labour management and employee relations</li> <li>Diversity and equal opportunity</li> <li>Community relations and engagement</li> <li>Water management</li> <li>Asset Management</li> <li>Catchment management and rehabilitation</li> </ul>
<b>Local Communities</b> Schools, health centres, police, local community, local businesses, landowners, and former employees	<ul style="list-style-type: none"> <li>Community development programs for health and education</li> <li>Employment opportunities</li> <li>Diversity and equal opportunities for women</li> <li>Electrification of communities</li> <li>Water stewardship</li> <li>Reforestation programs</li> </ul>	<ul style="list-style-type: none"> <li>ESG stakeholder survey</li> <li>Community meetings</li> <li>Face-to-face individual meetings</li> <li>Site visits</li> </ul>	<ul style="list-style-type: none"> <li>Community relations and engagement</li> <li>Diversity and equal opportunity</li> <li>Climate change and energy management</li> <li>Water management</li> <li>Catchment management and rehabilitation</li> </ul>
<b>Traditional Leaders</b> Village chiefs	<ul style="list-style-type: none"> <li>Corporate Social Responsibility</li> <li>Community development programs for health, education and infrastructure</li> <li>Mine re-opening and local employment</li> <li>Prioritising local procurement</li> <li>Community consultation</li> <li>Electrification of communities</li> <li>Water stewardship</li> <li>Diversity and equal opportunities for women</li> <li>Reforestation programs</li> </ul>	<ul style="list-style-type: none"> <li>ESG stakeholder survey</li> <li>Face-to-face meetings</li> <li>Village development committee meetings</li> <li>Phone calls</li> <li>Stakeholder survey</li> <li>Site visits</li> </ul>	<ul style="list-style-type: none"> <li>Community relations and engagement</li> <li>Labour management and employee relations</li> <li>Diversity and equal opportunity</li> <li>Water management</li> <li>Climate change and energy management</li> <li>Catchment management and rehabilitation</li> </ul>
<b>Shareholders and Investors</b>	<ul style="list-style-type: none"> <li>Risk management</li> <li>Health and safety</li> <li>Climate change risk and reporting</li> <li>Corporate Social Responsibility</li> <li>Community engagement</li> <li>Diversity and equal opportunity</li> <li>Reforestation programs</li> </ul>	<ul style="list-style-type: none"> <li>ESG Stakeholder survey</li> <li>Presentations/ webinars</li> <li>ASX announcements</li> <li>LinkedIn</li> <li>Meetings</li> <li>Phone calls</li> <li>Emails</li> <li>Annual reports</li> </ul>	<ul style="list-style-type: none"> <li>Health, safety and radiation</li> <li>Community relations and engagement</li> <li>Diversity and equal opportunity</li> <li>Climate change and energy management</li> <li>Catchment management and rehabilitation</li> </ul>
<b>Government and Regulators</b> All levels of government, and various departments and regulatory authorities, in multiple countries	<ul style="list-style-type: none"> <li>Tailings and waste management</li> <li>Mine re-opening and local employment</li> <li>Mine Development Agreement</li> <li>Diversity and equal opportunity</li> <li>Health, safety and radiation</li> <li>Community engagement</li> <li>Water stewardship</li> <li>Environmental management</li> <li>Electrification of communities</li> <li>Prioritising local procurement</li> </ul>	<ul style="list-style-type: none"> <li>ESG Stakeholder survey</li> <li>Site visits</li> <li>Emails</li> <li>Phone calls</li> <li>Letters</li> <li>Face-to-face meetings</li> </ul>	<ul style="list-style-type: none"> <li>Waste and hazardous materials</li> <li>Health, safety and radiation</li> <li>Community relations and engagement</li> <li>Diversity and equal opportunity</li> <li>Water management</li> <li>Climate change and energy management</li> <li>Catchment management and rehabilitation</li> <li>Economic performance and financial management</li> </ul>
<b>Suppliers</b> Local and international businesses	<ul style="list-style-type: none"> <li>Corporate Social Responsibility</li> <li>Waste and hazardous materials</li> <li>Health, safety and radiation</li> <li>Prioritising local procurement</li> <li>Environmental management</li> <li>Climate change</li> <li>Reforestation programs</li> <li>Diversity and equal opportunity</li> </ul>	<ul style="list-style-type: none"> <li>ESG Stakeholder survey</li> <li>Meetings</li> <li>ASX announcements</li> <li>Phone calls</li> <li>Emails</li> </ul>	<ul style="list-style-type: none"> <li>Community relations and engagement</li> <li>Waste and hazardous materials</li> <li>Climate change and energy management</li> <li>Catchment management and rehabilitation</li> <li>Diversity and equal opportunity</li> </ul>
<b>Potential and Future customers</b>	<ul style="list-style-type: none"> <li>Risk management</li> <li>Diversity</li> <li>Health, safety and wellbeing</li> <li>Corporate Social Responsibility</li> <li>Modern Slavery</li> <li>Environmental management</li> <li>Climate change risk and reporting</li> <li>Diversity and equal opportunity</li> <li>Reforestation programs</li> </ul>	<ul style="list-style-type: none"> <li>ESG Stakeholder survey</li> <li>ASX announcements</li> <li>Phone calls</li> <li>Emails</li> <li>Annual reports</li> </ul>	<ul style="list-style-type: none"> <li>Diversity and equal opportunity</li> <li>Community relations and engagement</li> <li>Health, safety and radiation</li> <li>Climate change and energy management</li> </ul>

# Materiality

**At Lotus, we aim to be leaders in sustainability. To achieve this, we continue to engage with our stakeholders and our peers and analyse the latest sustainability trends that are relevant to our business. We strive to integrate sustainable practices into our business strategy to mitigate risks and capitalise on opportunities.**

Lotus' FY24 Sustainability Report has been prepared using the GRI Standards, a reporting framework based on international sustainability principles, and the GRI Mining Sector Standards, which covers the specific impacts that mining operations can have on the economy, environment, people, and human rights. These Standards encourage Lotus to be transparent and accountable by disclosing our contributions to sustainable development and our material social and environmental impacts. Reporting in alignment with recognised standards also allows our investors to compare our performance with competitors and evaluate Lotus' potential for long-term success.

The GRI Standards define material topics as those that are the organisation's most significant economic, environmental, and social impacts, including their influence on human rights.

## MATERIALITY ASSESSMENT PROCESS

Lotus conducts a materiality assessment on an annual basis. This year's materiality assessment involved workshops with representatives from the Kayelekera and Letlhakane site teams, the corporate team, Lotus' Board and an ESG stakeholder survey to seek input from Lotus' external stakeholders. The workshops begin by reviewing the previous years material topics and identifying if any new topics should be added or topics removed. Lotus plans to undertake an ESG stakeholder survey every 2 years with this year's survey being our second survey.

The materiality assessment workshops involved identifying the positive and negative, potential and actual impacts of Lotus' activities to determine Lotus' Material Topics. Then assessing the significance of the financial materiality, risk or benefit, to determine the priority of each material topic.

For example Priority 1 material topics, have higher risks, costs or opportunities than priority 2 and 4 material topics. Priority 3 is still important but the risk, costs or benefits are lower than priority 1 and 2 material topics for Lotus' current activities.

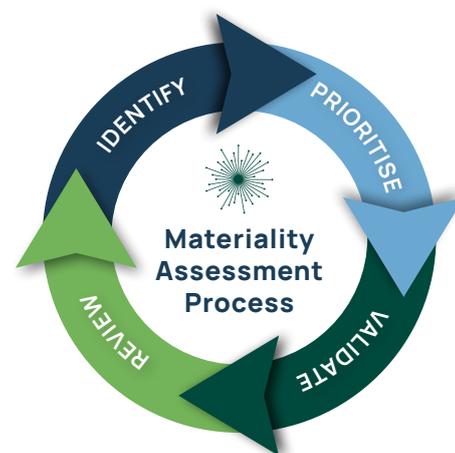
The outcome of the materiality assessment identified 13 material topics. Labour Management and Employee Relations was added as a new topic. Business Ethics, Anti-bribery and Corruption was combined with Human Rights and Security as it was identified that they both reported on similar impacts.

At the conclusion of the materiality assessment process, the material topics were presented to senior management, the ESG Committee and Lotus' Board. All parties approved the materiality assessment results, and the outcome was recorded in the Board meeting minutes.

This Report discusses the management and performance of the following material topics against the GRI standards.

## Material Topics

	Environment	Social	Governance
Financial materiality Opportunities Risk	Priority 1 Water management	Health, safety and radiation	Corporate governance and regulatory compliance
	Asset management	Community relations and engagement	Ethics, human rights, anti-bribery and corruption
	Priority 2 Waste and hazardous materials	Labour Relations	Economic performance and financial management
	Priority 3 Climate change and energy management	Diversity and equal opportunity	Cyber security and data management
	Catchment management and mine rehabilitation		



### The Sustainable Development Goals (SDGs)

Lotus recognises the importance of the 17 Sustainable Development Goals (SDGs) in reaching the *2030 Agenda for Sustainable Development*<sup>1</sup>. The SDGs act as an urgent call for action by all member countries to collaborate in a global partnership and wipe out poverty, fight inequality, and tackle climate change by 2030. In applying the SDGs to Lotus' operations, we have identified 8 that we see as most applicable to our business. We have set targets for these SDGs and will be reporting on our contribution

### SUSTAINABLE DEVELOPMENT GOALS



## Supply Chain

Supporting our communities by prioritising local procurement.

We strive to support our host communities wherever possible, including engaging local suppliers and helping them establish management systems and build their capabilities to be able to grow their business beyond the needs of our projects. We define a local supplier as a business exhibiting the following characteristics, registered in Malawi and Botswana, who employs nationals, pays taxes in the country where the goods or services were purchased, and are paid in the national currency.

Lotus is focused on prioritising local suppliers. In FY24, Lotus made purchases of US\$1,753,412 from local suppliers in Malawi and US\$817,521 from local suppliers in Botswana. This was approximately 73% and 76% of Lotus' procurement budgets, respectively.

### KAYELEKERA

Kayelekera is currently in care and maintenance and doesn't produce any mining products and subsequently has a limited supply chain, compared to an active mine site.

Throughout FY24, we engaged 110 local suppliers who provided a range of goods and services including diesel, food, security contractors, couriers, personal protective equipment (PPE) and maintenance equipment.

We also have a strong focus on engaging local labour hire companies and continue to support local businesses to employ and contract local community members to work at Kayelekera.

Lotus intends to increase engagement with our supply chain as Kayelekera transitions from care and maintenance into operations. This will allow us to share our sustainability objectives and encourage alignment with our values. This will involve establishing a modern slavery framework and due diligence process for our supply chain.



### Local suppliers engaged

FY24	FY23
273	118

### LETLHAKANE

Lethakane is an exploration project that is currently focused on drilling campaigns to improve the mineral resources for the project, and process optimisation work to improve the project production capability.

During FY24, Lethakane engaged 163 local suppliers. The main service providers were drilling contractors and database management, earth moving equipment, office rental, while the main goods purchased were diesel, health and safety products, PPE, tools, equipment and plant hire.



# Environment

## Water Management



### Lotus' Objective

- To ensure that there is efficient, safe, sustainable use and protection of water resources and ecosystems at the Kayelekera Mine.

### SDG Target

- Zero uncontrolled discharges resulting in contamination to the ecosystems surrounding the Kayelekera Mine.

### Our Performance

- Zero uncontrolled water discharges occurred during FY24.

### Key Policies or Procedures

- [Environmental Policy](#)
- Care and Maintenance Water Management Strategy

## *Lotus is committed to being a responsible steward of water*

Water is a valuable and vital resource and is needed for all living things. Lotus is focused on ensuring that water-related considerations are incorporated across all levels of our decision-making processes, especially when it comes to water usage and the impact of our operations on local water resources.

### KAYELEKERA WATER MANAGEMENT

Water resource at Kayelekera are a shared resources and need to be managed to ensure there is a sustainable supply for our operations, for our surroundings catchments and our communities.

Water management is a key activity for Lotus. Kayelekera is in a wet tropical savannah region. Each year the wet season brings large quantities of monsoonal rainfall between November and April. During FY24, Kayelekera received approximately 1,030 mm of rainfall.

Water at Kayelekera is managed in accordance with our Care and Maintenance Water Management Strategy. The purpose of this strategy is to manage the site water balance and to ensure the site has sufficient water and is always able to manage a 1 in 100 year 24-hour rain event without resulting in an uncontrolled discharge event from the return water ponds or the tailing storage facility (TSF). An uncontrolled discharge event from contaminated site water or the TSF is a risk that needs to be actively managed and can be avoided with ongoing monitoring and mitigation.

Following a rainfall event, direct rainwater and surface water runoff that is captured from mine pits, waste rock dumps and the plant terrace is channelled into our storage ponds and the TSF. Water levels are monitored weekly throughout the wet season. At the end of the wet season,

water levels are assessed to determine how much water needs to be discharged.

Rainfall that falls on undisturbed areas around the mine site is channelled into the freshwater pond for drinking water and amenities or diverted around the mine site into the Sere River.

Water Management at Kayelekera is the responsibility of the General Manager and Safety, Health, Environment, Radiation, Mine and Technical (SHERMT) Manager.

### KAYELEKERA SURFACE WATER DISCHARGE

Prior to discharging any water, the water is treated and cannot be released unless it is compliant with the World Health Organisation and Malawi Water Quality Limits. The potentially hazardous waste sludge produced from the treatment process is transferred to the TSF where it is contained onsite.

The licenced discharge point is in the Sere River. The Sere River water quality is monitored weekly at several locations during the discharge period in accordance with Kayelekera's Water Discharge Permit. The monitoring program includes, but is not limited to, testing pH levels, conductivity, total suspended solids (TSS), total dissolved solids (TDS), uranium, arsenic, sulphates, dissolved oxygen, radon and alpha particle emitters (radiation).



## LETLHAKANE WATER MANAGEMENT

Water is considered a scarce and valuable resource in Botswana. Serule is located in an arid and low water use area according to the [Aqueduct Water Risk Atlas](#).

The Ministry of Land Management, Water and Sanitation, and the Department of Water and Sanitation is responsible for managing land and water resources in Botswana. The *Water Act 1968* is the legislative framework that governs water management, and the Water Apportionment Board (WAB) regulates water rights.

Water is required at Letlhakane for the core shed and for exploration drilling activities. The water at the core shed is provided from a pipeline that runs through the village of Gojwane from the Letsibogo Dam, 40km east of Phikwe. This water is used on site for clothes washing and amenities.

The water for exploration drilling is sourced from rainwater collected in a pond developed by an old borrow pit, which was excavated by the shire council and the Department of Roads. Lotus has been granted permission from the Village Development Committee (VDC) to use the pond.

In preparation for mining at Letlhakane, a hydrogeological assessment was undertaken in 2011, approximately 40km west of the project area. 17 bore holes were drilled. The hydrogeological assessment concluded that the borefield has sufficient groundwater resources to meet the expected mine operation requirements. Lotus currently maintains the water rights over the borefield. However, no groundwater has been abstracted from the borefield.



**OUR PERFORMANCE**

Lotus recognises the importance of placing a value on water in terms of social, environmental, and economic aspects. We regularly engage with our local communities to understand their water needs and to help where we can. We are also committed to complying with our licence limits and strive to maintain good working relationships with local regulatory authorities.

**KAYELEKERA WATER TREATMENT AND DISCHARGE PROGRAM**

Kayelekera’s FY24 Water Treatment and Discharge Program took place between February - March 2024. It was successfully implemented with no uncontrolled discharges. 394,595 m<sup>3</sup> of water was treated and 323,803 m<sup>3</sup> was discharged into the Sere River in accordance with Kayelekera’s Discharge Permit water quality parameters. The program was monitored by the National Water Resource Authority (NWRA), using data sharing, site visits, and water sampling.

Kayelekera received more rainfall in FY24 than FY23 and discharged 12% more water.



**Rainfall**

FY24 – 1030 mm  
FY23 – 970 mm



**Water Discharged**

FY24 – 323,803 m<sup>3</sup>  
FY23 – 286,800 m<sup>3</sup>

**KAYELEKERA POTABLE WATER**

Rainfall that is collected in the freshwater pond is kept separate from all other ponds onsite and is pumped to the potable water treatment plant onsite, only to be used for amenities. While the Kayelekera is in the care and maintenance phase, the freshwater management system has not had monitoring equipment in place to record the water usage. This is planned to be addressed during operational readiness.

Potable water for drinking is purchased for consumption at Kayelekera as it is more cost effective based on the number of staff while the site is not currently in operation. Abstraction of additional water from the nearby rivers or groundwater boreholes is currently not being conducted.

**LETLHAKANE WATER CONSUMPTION AND DISCHARGE**

Water consumption is not currently measured at Letlhakane. No water was discharged to the environment

**WATER AND REPORTING**

Lotus has not been subject to any water-related incidents that have impacted our operations since March 2020 when we acquired the Kayelekera Mine.

Lotus has not been issued any fines or penalties related to the environment or ecological issues in the last four fiscal years.

During the reporting period, two audits were undertaken at Kayelekera. The first audit, performed in November 2023 by the Malawi Environment Protection Authority (MEPA) and NWRA, recommended that every water monitoring bore requires an individual licence. This recommendation was addressed by submitting an application for 71 water monitoring bores of which the licences are now granted.

The second audit was conducted by NWRA in April 2024 and focused on the 2024 water treatment program. The audit confirmed that Lotus’ water volumes and quality standards were compliant with all standards and licence conditions.

In accordance with Letlhakane’s water licence, Lotus conducts quarterly sampling and water quality testing of the groundwater borefield and reports the results to the WAB annually. In June 2024, the directors of the WAB visited the site to inspect the water bores and better understand the water requirements of the project.



# Asset Management, Including Ground Stability



## Lotus' Objective

- To maintain integrity of structures containing our waste products, specifically TSF embankments and stabilisation of WRD to minimise risk of failure.

## SDG Target

- Zero incidents that cause contamination to the environment or impact our local communities

## Our Performance

- No TSF or WRD incidents reported during FY24.

## Key Policies or Procedures

- Environmental Policy
- Slope Movement Monitoring Procedure

## *Asset management and ground stability are an integral component of our care and maintenance activities.*

Our assets include the processing plant, tailings storage facility (TSF), pit, storage ponds, a clean waste rock dump (WRD) and various low and high-grade ore stockpiles comprising of mineralised waste, marginal ore, mudstone ore, and high-grade ore.

### GROUND MOVEMENT AT KAYELEKERA

Lotus manages the ground movement in accordance with the Slope Movement Monitoring Procedure. Ground movement at the mine occurs due to a combination of issues relating to a historical slip surface below the plant. The original mechanism driving the slope movement was due to the external disturbances in the form of the cutting and/or filling of parts of the slope for plant construction. The load provided by the WRD at the head of the slope has resulted in the alteration of the balance between the driving and the resisting forces, which in turn leads to renewed movements in the slope.

Lotus performs regular monitoring of its mining assets to assess if any ground movement is occurring. This ensures any areas that require repair or mitigation measures can be implemented to ensure the community and any infrastructure impacted by the movement can be protected in accordance with legislative requirements and good industry practice.

Asset Management at Kayelekera is the responsibility of the General Manager and the SHERMT Manager.

### OUR PERFORMANCE

Lotus continues to perform measures to reduce any potential impact from ground movement at Kayelekera. Drones have been utilised to monitor the TSF, with a specific focus on managing ground movement and vegetation growth.

Regular inspections and prism surveys are also undertaken to monitor the integrity of the TSF embankments and decant pond. No significant TSF incidents involving embankment failures or overtopping events have been reported during Lotus' ownership of Kayelekera (since March 2020).

Additional prism surveys were conducted at the plant, pit, RWP2 and stockpiles, which provide data on areas that experience ground movement.

There were no incidents that caused contamination to the environment or impacted the local communities during the reporting period.

In March 2023, ground movement was identified on the western wall of RWP2 as a result of high intensity rainfall. This contributed to lateral ground displacement, recorded via prism monitoring. Remedial measures were implemented between August and November 2023, including drainage maintenance, gabion basket retaining wall installation in areas susceptible to ground movement, and refurbishing of the western wall of RWP2. These stabilisation works significantly reduced the impact of ground movement on RWP2 and structures above it.



RWP2 Stabilisation Project - Gabion Wall

# Waste and Hazardous Materials



## Lotus' Objective

- To ensure that the disposal and management of waste and hazardous materials do not harm the environment, or workforce, or the communities adjacent to our mine site.

## SDG Target

- Zero incidents that cause:
- Contamination to land or water
  - non-compliance associated with waste licencing and regulations.

## Our Performance

- Zero incidents resulting in contamination.
- Zero waste non-compliance.

## Key Policies and Procedures

- [Sustainability Policy](#)
- [Environmental Policy](#)
- Waste Management Plan
- Radiation Management Plan

## *We are committed to managing our waste materials to ensure compliance with relevant legislation and international good practice.*

Managing waste materials in accordance with international good practice and relevant legislation is fundamental to reducing the risks of impacts to environment, workforce, or the communities adjacent to our project areas. Lotus' primary focus is exploring and mining uranium. These activities produce hazardous and non-hazardous waste materials.

Hazardous waste material at Kayelekera includes used oil, medical waste and water treatment sludge left over from treating rainfall collected in site water ponds, which potentially has low levels of radiation.

At Letlhakane, the hazardous waste includes, radioactive sources used as check sources and for density logging, and radioactive drill cuttings and pulps from exploring for uranium.

Non-hazardous waste includes waste from drilling activities, maintenance activities, camp kitchens, and offices. The waste products generated at Kayelekera were relatively small except for the water treatment sludge, which varies according to how much rainfall is received and the amount of water treated for discharge. The Letlhakane Project only had low levels of waste, mainly office waste, until drilling commenced in May 2024.

We consider hazardous waste as a priority 3 material topic as we only have small quantities of waste that is disposed of onsite. Kayelekera's waste treatment sludge is disposed in the TSF, while Letlhakane's waste drill cuttings and wastewater is buried in sumps or pits in the same location that it was drilled.



## HOW WE MANAGE OUR WASTE

### Kayelekera

Our hazardous waste is managed in accordance with our Waste Management Plan, Radiation Management Plan, and Waste handling and disposal procedures. Waste disposal sites include the site landfill for non-hazardous materials and the TSF and incinerator for hazardous materials. Hazardous waste has been identified as a ESG risk that needs to be carefully managed as it contains low levels of radiation or hydrocarbons.

If hazardous materials are not carefully managed, impacts may occur while being transported, handled, or disposed of and could impact the health of our employees, contractors or communities, as well as damage the environment through soil, groundwater and surface water contamination.

The Waste Management Plan details specific management actions for identifying issues with assigned timing and accountability and includes:

- Offering annual training to staff and contractors to enhance collective knowledge on waste classification and recycling
- Obtaining necessary licences for all the waste and hazardous materials generated onsite
- Recording and monitoring the type and volume of all hazardous materials generated and held on site
- Providing appropriate signage to highlight waste and hazardous material storage areas
- Auditing our compliance with applicable regulations and licence conditions
- Cleaning up any spills that occur and reporting them to relevant authorities
- Undertaking regulator environmental inspections in accordance with our Environmental Inspection Schedule and auditing our compliance with regulations

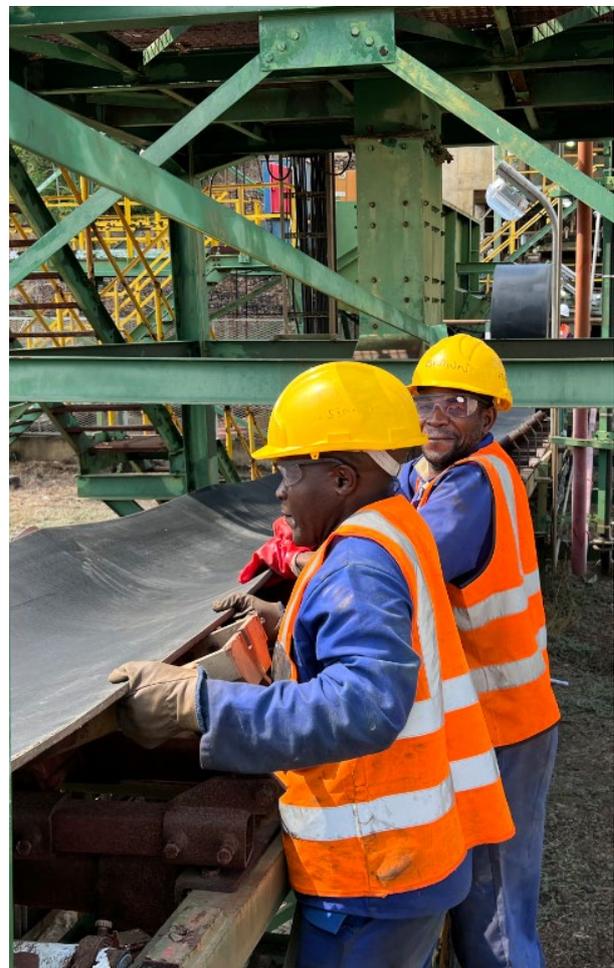
Management of waste at Kayelekera is the responsibility of the General Manager and the SHERMT Manager.

### Letlhakane

At the Letlhakane Project, waste management includes a focus on minimising waste generation and ensuring it is appropriately disposed of. A waste tracking template has been developed to allow employees and contractors to enter data for the efficient tracking of waste. This system relies on self-monitoring and the accountability of all parties and intends to be continuously improved to ensure accurate tracking and data collection. Additionally, recovery and recycling initiatives are being explored, including the reuse of bulk sample bags, allowing improved waste management and the encouragement of environmental conservation.

Most of Letlhakane's waste is non-hazardous, however during drilling, hazardous waste is produced by intercepting mineralised material. This waste is managed in accordance with our Radiation Management Plan. The Plan is focused on minimising and monitoring exposure to radiation, including PPE requirements, ensures restricted access to radioactive materials and details the proper disposal methods for hazardous materials.

Management of waste at Letlhakane is the responsibility of the Country Manager and Science and Technology Lead.



## OUR PERFORMANCE

### Kayelekera

Data on waste composition and quantity was collected and reported to the General Manager on a weekly basis during FY24. Regular inspections of waste disposal areas are undertaken to track waste generated and held on site and to ensure it is appropriately disposed. Data is captured during waste collection, classification and disposal stages and recorded into spreadsheets.

Kayelekera's largest volume of hazardous waste is the water treatment sludge from the surface water treatment program. The water treatment sludge was successfully transferred to the TSF following the FY24 treatment program. The volume of sludge, however, was not recorded as the monitoring equipment malfunctioned during the treatment process. Surface water monitoring confirmed that there were no uncontrolled discharge events resulting in contamination. All of the monitoring results were below the discharge licence limits in the Sere River.

Medical Waste is transported to Karonga District Hospital for incineration.

Oil contaminated wastes are incinerated on site.

Used oil is taken off site by a licenced contractor and taken to Karonga Town for reuse.

Paper and cardboard collected from the camp and offices was taken off site and recycled.

There was no mineral waste (waste rock or tailings) generated during the reporting period or the previous 3 years as the project has been in care and maintenance.

To ensure waste is correctly disposed in accordance with waste policies and procedures, 31 employees and contractors at Kayelekera were trained in waste management in FY24.



**There were no incidents of non-compliance recorded with all hazardous and non-hazardous waste collected and disposed through appropriate channels in the reporting period.**

**No significant spills were reported during FY24.**

### Letlhakane

The main waste product for Letlhakane during FY24 was drilling sample. 165 tonnes of waste was generated during two months of drilling. 60 tonnes of this waste was considered hazardous waste as it hosted uranium mineralisation. This consisted of excess samples from reverse circulation drilling and is calculated by multiplying the total metres drilled with the cross-sectional area of the drillhole and the average density of the drilled formation. The hazardous waste generated from this process is regarded as the fraction of the total waste from significant uranium intercepts and calculated as above, using just the total metres of significant uranium intercepts. This material has been classified as waste as it has been displaced from its original location, it's not required after drilling and sampling has been completed, and needs to be disposed of.

The drill sample waste has been buried in a pit or sump near the location where it was drilled. The hazardous waste material is buried in the stratigraphic horizons that have preexisting uranium mineralisation. This is to ensure that the uranium mineralisation remains in the areas where it naturally occurs and is not introduced into new areas.

The Letlhakane team has engaged a licenced waste contractor to collect and recycle/repurpose their waste oil.

There was no mineral waste (waste rock or tailings) generated during the reporting period as Letlhakane is an exploration development project.



\*The volume of water treatment sludge was not recorded as the monitoring equipment malfunctioned during the water treatment process.

# Climate Change and Energy Management



## Lotus' Objective

- To identify opportunities to reduce energy consumption and associated carbon emissions.

## SDG Target

- Improve energy efficiencies and reduce energy consumption and carbon emissions where possible.
- To develop an energy strategy that reduces GHG emissions at Kayelekera when mining recommences.

## Our Performance

- Increased our diesel consumption by 32% from FY23
- Increased our GHG emissions by 13% from FY23
- Continued to advance the implementation of hybrid energy strategy for Kayelekera.

## Key Policies and Procedures

- [Sustainability Policy](#)
- [Environmental Policy](#)
- Environmental Management Plan

## *Lotus is committed to reducing carbon emissions across our operations and aims to become one of the lowest carbon emitting uranium producers*

Uranium is a very efficient low carbon energy source that has an important role to play in the global movement of reducing carbon emissions and mitigating climate change.

### ENERGY MANAGEMENT AT KAYELEKERA

While in care and maintenance we manage our energy consumption by optimising energy use to reduce fuel consumption and improve cost efficiency. All of Lotus' employees, as well as onsite contractors working on our behalf, play a pivotal role in efficient energy usage. Lotus endeavours to use energy in an efficient, cost effective, and environmentally responsible manner through:

- Procuring adequate and dependable energy supplies from sustainable sources and implementing appropriate risk contingency plans to protect operations from supply interruptions.

- Encouraging continuous improvement in energy conservation by our employees.
- Ensuring that we comply with all applicable legal and other requirements on energy usage, management and efficiency.

Since acquiring the Kayelekera site, we have replaced old equipment with more fuel efficient, fit for purpose, small diesel generators that perform lower fuel consumption. Alongside this, we have reduced the running time of the larger generators, which are now only used for treating water in accordance with our annual water treatment requirements. We have also decreased the risk of oil or diesel spills by improving the maintenance processes of our equipment, reducing the likelihood of equipment failure.



### Hybrid Power Strategy at Kayelekera

Lotus is committed to reducing greenhouse gas emissions across our operations. This involves assessing and understanding our climate risks and opportunities and ensuring resilience against any future climate impacts to our business.

Power at Kayelekera is currently provided by diesel generators. This method was carried forward from the previous mining operations. In FY22, Lotus commenced a study to investigate switching Kayelekera's power generation from diesel generators to a combination of cleaner alternatives. The study identified that reliable power for part of our future operations will be available from the Electricity Supply Corporation of Malawi (ESCOM). The majority of ESCOM power supply is from the hydropower facility on the Shire River or the solar farms in the central region of Malawi and would be connected to site via a powerline. This power supply option would include a combination of power options produced from the site acid plant, a solar/battery energy storage system (BESS), and the powerline and is referred to as the Hybrid Power Strategy. The diesel generators would remain on site as a backup power source.

The study predicted that CO<sub>2</sub> emissions from the mine would reduce by approximately 21,000 tonnes per annum (tpa) by implementing the hybrid system when comparing to the base case diesel genset option based on the previous mining operations at Kayelekera. The outcome of the study estimated CO<sub>2</sub> emissions for power generation at the mine using the proposed hybrid system to be approximately 8,000 tpa.

Energy Management at Kayelekera is the responsibility of the Chief Operations Officer, General Manager and SHERMT Manager.

### ENERGY MANAGEMENT AT LETLHAKANE

The Letlhakane team endeavours to reduce energy consumption and greenhouse gas emissions wherever possible. As the Letlhakane Project is in the exploration phase, we have not implemented any specific targets or objectives to reduce diesel consumption or greenhouse gas emissions, however, energy and fuel consumption will be monitored to identify where reductions can be made.

Diesel and petrol are used in our vehicles and by our drilling contractors during our exploration programs.

Letlhakane Core Shed is connected to the Botswana power grid. This power is mainly produced from coal power stations.

Energy management is overseen by the Country Manager and Senior Geologist.



## OUR PERFORMANCE

### Energy consumption

During the reporting period, we consumed 430 kL of diesel at our Kayelekera operations. 344 kL was used in power generation and 86 kL was used by vehicles and machinery. This is an increase of 32% in diesel consumption from FY23 but is 41% lower than FY22.

At Letlhakane, we consumed approximately 36 kL of diesel and 10 kL of petrol between November 2023 and June 2024.

Power at the core shed used 1,194 kWh of electricity from the local power grid.

### Greenhouse gas emissions

In FY24, Kayelekera produced 1,174 t CO<sub>2</sub>-e of Scope 1 emissions. This is 4% more emissions than what was produced in FY23. The scope 1 emissions are generated from diesel generators and operating light vehicles and mobile equipment. We don't produce any Scope 2 emission at Kayelekera as we generate all our power on-site.

We continue to work closely with Malawi Regulators and continue to report our annual diesel and oil consumption to the Malawi Energy Regulatory Authority (MERA) and Malawi's Environmental Affairs Department (EAD)

At Letlhakane between November 2023 and June 2024, we produced 129 t CO<sub>2</sub>-e Scope 1 emissions and 21 t CO<sub>2</sub>-e Scope 2 emissions.

All energy consumption during FY24 was from non-renewable sources.

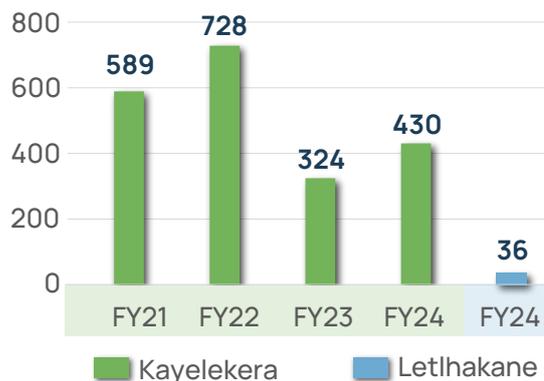
We have not commenced calculating our Scope 3 emissions at this stage.

### Kayelekera Hybrid Power Strategy Update

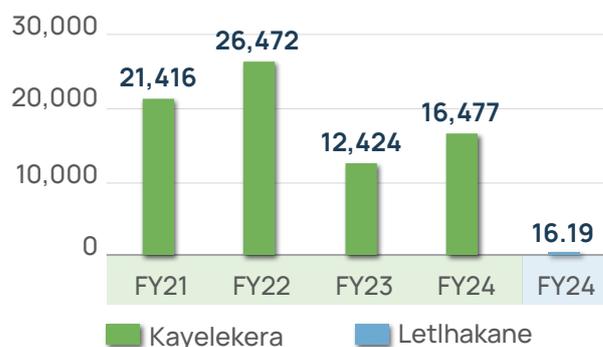
During FY24, Lotus continued to progress the hybrid power strategy by liaising with ESCOM to implement a technical and commercial strategy to connect Kayelekera with the national power grid.

A number of route options were assessed for a 66 kV powerline. The route that has been selected follows the road network and traverses near several villages. These villages are not currently connected to an electricity network. Lotus is funding the powerline and by installing the infrastructure using this route, it will enable villages to work with ESCOM in the future to connect to the powerline and bring electricity to their homes.

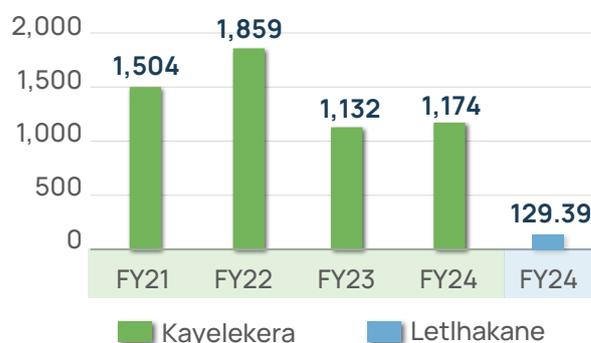
### Total Diesel Consumption (kL)



### Total Energy Consumption (GJ)



### Scope 1 Emissions (t CO<sub>2</sub>-e)



GHG's included in Scope 1 emissions calculation includes: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O

## CLIMATE-RELATED FINANCIAL DISCLOSURES

Global warming from greenhouse gas emissions poses significant risks to the global economy and is expected to have an economic impact on various sectors. Lotus commenced preparing to report in accordance with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations in FY22, to integrate climate change considerations into our business decisions. The TCFD offers a global framework for businesses to disclose clear, comparable and consistent information on climate-related risks and opportunities.

The Treasury Laws Amendment (Financial Market Infrastructure and Other Measures) Bill 2024 (Cth) (the Act), which introduces the framework for Australia's first climate-related financial disclosure regime, was passed by Parliament in September 2024. This Act mandates the requirement for companies to report in alignment with the Australian Sustainability Reporting Standards (ASRS) from 2025 onwards, with a phased-in approach based on revenue, assets, employees and emissions.

The proposed disclosure requirements are aligned with the International Sustainability Standards Board's (ISSB) International Financial Reporting Standard (IFRS S2), which incorporates the TCFD recommendations. Complying with the mandatory reporting regulations demonstrates our commitment to reducing our carbon emission, while also facilitating corporate responsibility and investor confidence, and avoids potential legal and financial penalties, as well as reputational consequences.

These standards mandate comprehensive reporting on climate-related financial information including climate risks, opportunities, and GHG emissions by disclosing a company's governance, strategy, risk management, and metrics and targets.

## GOVERNANCE

### Lotus Board oversight of climate-related risk

As a responsible uranium producer, Lotus is working to ensure that climate change is routinely considered in business decisions. The Board reviews and ratifies Lotus' business strategy, systems of audit, risk management, internal compliance and controls, codes of conduct, and legal compliance. In their role of overseeing sustainability, the Board delegates responsibility to the ESG Committee, which consists of two Board members who offer feedback to the Board on climate-related risks and opportunities.

### Role of Lotus Management for climate-related risk

It falls within the roles of the Managing Director/CEO, the Chief Operating Officer and Chief Financial Officer (CFO), and the ESG Manager to govern Lotus' sustainability issues. Together, they control the daily implementation of Lotus' risk management and governance system, and report to the Board on key risks in the areas of health and safety, finance, environment, social, and governance, and provide insight into how these risks have been appropriately managed.

## STRATEGY

In FY23, we completed a climate risk review with representatives from the Kayelekera site team, the corporate team and Lotus' Board. The risk review involved dividing climate-related risks into two categories: (1) risks related to the transition to a lower-carbon economy and (2) risks related to the physical impacts of climate change and then brainstorming opportunities for mitigating or adapting to climate change.

The climate-related risks and opportunities were assessed over the short, medium, and long term. The outcome of the climate risk review identified ten transition risks, seven physical risks and eight climate related opportunities. These risks and opportunities are described in Lotus' FY23 Sustainability Report.

## RISK MANAGEMENT

Building on the FY23 risk review, we completed our first climate scenario risk and opportunities assessment in line with ASRS requirements. This analysis involved a gap review, interviews and workshops to identify climate risks and opportunities. Through this analysis, we identified several climate risks and opportunities and their potential impact on our business. The interviews conducted as part of our analysis took place with members from the ESG team, Finance, Risk and Leadership team, and the Operations team, and the workshop identified mitigation measures that Lotus currently has in place.

Climate risks are integrated into the company's overall risk management system. The ASRS require a climate scenario analysis to be conducted using at least two climate scenarios; one consistent with the Paris Agreement, and one which exceeds 2°C warming above pre-industrial levels. To align with this, Lotus' analysis used an "Orderly" transition scenario that meets the Paris Agreement, and a "Hothouse World" scenario where no climate action is undertaken and assessed our climate risks and opportunities in both scenarios across the short, medium, and long term. The outcome of the analysis identified three physical risks, three transition risks, and two opportunities.

# Climate Scenario Risk Assessment

**Risk Scale**

Very low Low Medium High Very high

**Opportunity Scale**

Very low Low Medium High Very high

Risk/ Opportunities	Description	Potential Impacts on business, strategy, and financial planning	Mitigation Measures	Risk Rating			
<b>Heavy rainfall (physical risk)</b>	Kayelekera experiences a lengthy rainy seasons with high levels of rainfall – over 1,000 mm in 4-5 months	<ul style="list-style-type: none"> <li>Mine site flooding</li> <li>Overtopping of the TSF or storage ponds</li> <li>Increased ground movement causing infrastructure damage</li> <li>Reduced access to site due to landslides or flooding impacting roads</li> </ul>	<ul style="list-style-type: none"> <li>TSF Design and Management Plan</li> <li>Ground movement monitoring</li> <li>Annual water treatment and discharge process</li> <li>Controls to manage excess water at Kayelekera e.g. licence conditions, diversion channels, and monitoring pond levels</li> <li>New infrastructure to be built on suitable structures to mitigate ground movement</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Uncertainty of extreme events (physical risk)</b>	The frequency and severity of tropical cyclones may increase as global average temperature and sea-surface temperature rises. Strong cyclones have the potential to impact Kayelekera and Letlhakane and their supply chains.	<ul style="list-style-type: none"> <li>Damage to mine infrastructure lowering production</li> <li>Damage of supply chain infrastructure such as roads, airports, or ports</li> <li>Power interruptions or shortages due to powerlines or infrastructure being impacted</li> </ul>	<ul style="list-style-type: none"> <li>Implement the Hybrid Power strategy at Kayelekera with built-in power alternatives</li> <li>Evaluate alternative supply routes</li> <li>Maintain additional supplies for critical items including food and diesel</li> <li>Asset management including TSF and Return Water Pond protocols to minimise impact of any damage</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Heat stress (physical risk)</b>	Monthly mean temperatures are projected to increase across both sites. Monthly relative humidity is projected to decrease for both sites across scenarios, however, the number of days with 'strong' or 'dangerous' humidity levels is projected to gradually increase.	<ul style="list-style-type: none"> <li>Impacts to worker health and productivity</li> <li>Equipment malfunctions due to prolonged periods of high temperature</li> <li>Ground instability and infrastructure damage due to drought</li> </ul>	<ul style="list-style-type: none"> <li>Provide appropriate PPE for each activity</li> <li>Provide food and water and regular breaks</li> <li>Undertake regular maintenance of equipment</li> <li>Ongoing ground movement monitoring at Kayelekera</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Increased pricing GHG emissions (transition risk)</b>	Both Kayelekera and Letlhakane will be energy intensive when operating and an increase in pricing of GHG emissions and carbon may increase costs.	<ul style="list-style-type: none"> <li>Increase in indirect operating cost as supplier costs increase</li> <li>Reduced investment or offtake from higher product costs or products with higher emissions</li> <li>Increase in capex costs from the implementation of mitigation activities to reduce emissions</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of hybrid power strategy at Kayelekera to reduce use of diesel power generators, and progress connection to ESCOM grid</li> <li>Develop plan for emissions reduction at Letlhakane</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Uncertainty in markets (transition risk)</b>	Uncertainty in the diesel market may result in an increase in costs for Kayelekera and Letlhakane.	<ul style="list-style-type: none"> <li>Reduced profit due to rising diesel costs</li> <li>High sensitivity of operations to diesel prices</li> <li>Reduced competitiveness due to increased cost</li> </ul>	<ul style="list-style-type: none"> <li>Business planning cycle (budget, long term planning, procurement strategy)</li> <li>Build climate scenario pricing projections into business planning</li> <li>Develop plan for clean energy at Letlhakane</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Development of competing technology (transition risk)</b>	Increasing popularity of battery storage, and renewables, could reduce the need for nuclear energy as a low-emission, power source.	<ul style="list-style-type: none"> <li>Reduced competitiveness of nuclear energy</li> <li>Decline in uranium demand</li> <li>Increased economic pressure on nuclear costs</li> </ul>	<ul style="list-style-type: none"> <li>Sales contracting strategy</li> <li>Marketing strategy to reinforce the importance of low emission, baseload dispatchable power, available when the sun doesn't shine, and the wind doesn't blow</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Increased uranium demand (opportunity)</b>	A significant increase in uranium production is required to facilitate nuclear energy's growth potential to reduce greenhouse gas emissions and support the transition to net-zero.	<ul style="list-style-type: none"> <li>Strong growth of nuclear</li> <li>Substantial investment in nuclear energy</li> <li>61 additional nuclear power plants are in construction</li> <li>More countries are considering nuclear power</li> </ul>	<ul style="list-style-type: none"> <li>Monitor market changes</li> <li>Offtake jurisdictions increase carbon taxes</li> <li>Global increase in net zero targets</li> <li>Government support for nuclear power</li> </ul>	Orderly	Short term	Medium term	Long term
<b>Use of low emissions energy (opportunity)</b>	By transitioning from diesel generators, to low-emissions technologies and hybrid power sources such as battery and hydropower, the mining operation can significantly reduce its environmental impact.	<ul style="list-style-type: none"> <li>Increased investment in nuclear energy</li> <li>Competitive advantage</li> <li>Cost reduction</li> <li>Greater resilience to market fluctuations and regulatory pressures</li> </ul>	<ul style="list-style-type: none"> <li>Implement Hybrid Power Strategy</li> <li>Investigate further low emissions technology to implement</li> <li>Monitor market changes</li> <li>Identify opportunities for alternate customers</li> </ul>	Orderly	Short term	Medium term	Long term

# Catchment Management and Mine Rehabilitation



## Lotus' Objective

- To minimise impacts of the mine's activities on the surrounding ecology.
- To undertake progressive rehabilitation in areas no longer in active use.

## SDG Target

- Undertake quarterly bio-monitoring programs to monitor the health of the natural environment surrounding the mine.
- Propagate local species to undertake ongoing revegetation around the mine.

## Our Performance

- Quarterly biomonitoring was undertaken at Kayelekera.
- 1,870 seedlings planted in Kayelekera rehab program
- 6,000 seedlings donated to the community.

## Key Policies and Procedures

- [Sustainability Policy](#)
- [Environmental Policy](#)
- Mine Closure Plan
- Environmental Management Plan

***Lotus takes pride in our commitment to protect the natural environment that surrounds our project.***

## CATCHMENT MANAGEMENT (BIODIVERSITY)

We are committed to protecting the ecosystems and the catchments that surround Kayelekera and Letlhakane and minimising our impacts on biodiversity.

In 2022, 188 governments officially recognised the critical need to protect biodiversity at the United Nations Biodiversity Conference (COP15). They committed to preventing and reversing nature loss through ambitious targets set under the Global Biodiversity Framework (GBF). Biodiversity management for mining activities involves implementing a mitigation hierarchy which includes avoiding impacts, minimising impacts, rehabilitation/restoration and offsetting.

### Biodiversity at Kayelekera

Potential biodiversity and ecology impacts were assessed during pre-mining stage baseline studies for the mine's initial environmental impact assessment. The information collected during the studies was used to develop an Environmental Management Plan (EMP). This EMP is regularly updated to be aligned with current legislation and international standards.

Kayelekera is surrounded by dry Miombo woodland vegetation. This vegetation is representative of plant species found in most of northern Malawi and much of Malawi as a whole. The Kayelekera Mine site is not located in or directly adjacent to any protected areas or areas of high biodiversity. Kayuni Hill, Musisi Forest Reserve, and Nylka Forest Reserve are the nearest protected areas to the mine site but are at least 4 km away and are not impacted by the mine's activities.

No threatened plant species from the International Union for Conservation of Nature (IUCN) Red List Species were found in the Kayelekera mining licence area.

A comprehensive survey of rivers and streams in the area was conducted in 2006 and provided measurable indices of river health. Aquatic macro-invertebrates were chosen as a focus for ongoing bio-monitoring around Kayelekera as they provide a good indication of overall stream conditions and can easily be monitored with sufficient statistical strength. The monitoring is undertaken quarterly at six sites: four sites on the Sere River, one site on the Chapwasha River and one site on the Muswanga River.

Catchment management and rehabilitation at Kayelekera is the responsibility of the General Manager and SHERMT Manager.



## Biodiversity at Letlhakane

Biodiversity and rehabilitation of drilling activities is managed in accordance with the site Environmental Management Plan with additional management provided in the Safety, Health, Radiation, Environment and Community (SHREC) Management Plan, Drilling and Excavation Procedure, and the Trenching and Clearing Procedure.

A biodiversity assessment of the Letlhakane Project area was undertaken over 3 seasons in 2009, 2010 and 2014.

The vegetation surrounding the Letlhakane Project is Mopane/Acacia woodland. The most common vegetation types are the Mopane woodland and the riparian woodland located along the major drainage line transecting the site. The riverine woodland is narrow and dominated by Acacia karoo (Mooka). Species diversity is expected to vary between habitat types with the highest diversity present within the Mopane woodland. No national or IUCN threatened plant species were identified during the 2009 and 2010 biodiversity surveys.

A fauna survey was undertaken over the project area in 2009 and 2014. Examples of fauna species recorded during the survey included the Black backed Jackal, Acacia Squirrel, Impala, Duiker and Steenbok. Evidence of other mammals present in the area included Brown Hyena, Caracal and Kudu as well as nesting sites for the White-backed vultures. The Riparian woodland habitat, along the main river, contained the richest species diversity (12 species), indicating it to be an important

habitat for mammals in the area. Clearing for exploration activities is minimised or avoided in this habitat. The White-backed vultures is listed as 'Endangered' on the IUCN Red List of Threatened Species. No other faunas species were identified as IUCN Red List of Threatened Species.

The Letsibogo Dam is located 40km east of the Letlhakane project area. The dam was built in 1997 and covers roughly 15km<sup>2</sup>. The area surrounding the Dam consists of drought-resistant Acacia and Mopane woodland and shrubland. The dam was not constructed in an ecologically sensitive area, and following its construction, hosts new aquatic, riparian, and bird life ecosystems. The Letsibogo Dam, which provides water to the Letlhakane camp and local towns and villages, has the most significant impact on biodiversity due to its reservoir surface area.

There are no protected areas within or adjacent to the Letlhakane Project area.

The Ministry of the Environment, Natural Resources Conservation and Tourism is responsible for the protection and conservation of Botswana natural resources. The Department of Environmental Affairs (DEA) is responsible for compliance. Botswana's Mines and Minerals Act outlines Lotus' obligations for preserving the environment. The Water Act and the Environmental Impact Assessment Act also govern protection of the environment.

Catchment management and rehabilitation at Letlhakane is the responsibility of the Country Manager, and Science and Technology Lead.



Exploration drilling near Kayelekera

## REHABILITATION

### Kayelekera

Rehabilitation and mine closure are an integral part of our mining operations. Rehabilitation is undertaken progressively to return the disturbed land to a stable, self-sustaining landform that is compatible with the surrounding environment and has similar land use options and ecological values that existed prior to the commencement of operations. Rehabilitation involves earthworks, topsoil replacement, grass seeding, planting of trees and shrubs, and ongoing monitoring.

### Mine Closure Plan (MCP)

The MCP references both a provisional option for closure of the site as it is today and an end of life-of-mine option for closure post completion of the restart as described in the 2022 Definitive Feasibility Study. There are no specific legislative requirements for mine closure in Malawi and there are no guidelines for rehabilitation. The MCP has been developed by external consultants in accordance with guidance from the following:

- The Australian Government Leading Practice Sustainable Development Program for the Mining Industry – Mine Closure (2016)
- The Western Australia Department of Mines, Industry Regulation, and Safety, The 'Mine Closure Plan Guidance' (2020)

- The South African Land Rehabilitation Guidelines for Surface Coal Mines (2019)
- The International Finance Corporation (IFC) 2007 Environmental Health and Safety Guidelines for Mining
- The International Council on Mining and Metals (ICMM) Integrated Mine Closure Toolkit.

Lotus has provided the Government of Malawi with a US\$10 million performance bond to support the rehabilitation obligations at Kayelekera. The liability for closure is included in the long-term liabilities of the Company.

### Rehabilitation of drilling activities

Lotus minimises its clearing impacts from drilling at Letlhakane by:

- Surveying access routes to determine the most direct route with least amount of clearing
- Avoiding clearing of larger trees
- Raised blade clearing of drill pads to minimise surface and plant root disturbance
- Rehabilitating following the completion of drilling
- Holes capped and backfilled, rubbish removed
- Excess drilling samples buried in sumps/pits
- Access tracks that are no longer required are revegetated to reduce erosion caused by wind or rain, to encourage regrowth



## OUR PERFORMANCE

### Kayelekera

Lotus continued to perform our bio-monitoring program, which surveys invertebrates in the rivers surrounding the mine site. These surveys have been performed quarterly since 2006 in accordance with the Malawi Environment Protection Authority (MEPA) environmental management and compliance requirements.

During the reporting period, progressive rehabilitation was performed on the slopes of the RWP2, where the ground movement occurred. Approximately 0.91 ha was rehabbed by grass matting, soil conditioning of the planting stations, and the planting of trees.

A total of 1,870 seedlings were planted, with 350 of these being blue gums that were strategically chosen to increase the uptake of groundwater and stabilise the ground, helping to reduce ground movement following rainfall events. The remaining 1,520 planted trees comprised both Acacia and Mahogany species. The rehabilitated areas are monitored monthly to ensure adequate tree growth. If stunted growth is observed, remedial measures are implemented. During the reporting period, all areas demonstrated healthy vegetation growth, and this has contributed to a decrease in soil erosion and an increase in vegetation cover over the slopes. Additionally, active weed management was undertaken at Kayelekera.

A government audit took place at the Kayelekera Mine in November 2023. The audit focused on several environmental areas, including the rehabilitation of disturbed ground, and was guided by the Environmental Management Plan.

### Hybrid Power Strategy

Lotus is working with ESCOM to build a 66 kV powerline from Karonga to Kayelekera to bring renewable energy to the mine site. A biodiversity impact assessment for this project was undertaken during FY24 and involved completing a flora and fauna survey over the powerline corridor. No IUCN Red List of Threatened Species were identified during the survey. Most species were as listed Least Concern with only one flora species, *Dalbergia melanoxylon*, listed as Near Threatened.

### Letlhakane

During the reporting period, Lotus rehabbed an old metallurgical sample pit (approximately 0.5 ha) that was excavated prior to Lotus's ownership.

During the FY24 drilling program, Lotus cleared 21.4 ha for access roads and drillpads. The majority of the drill sites will be rehabilitated following completion of the drilling program. Access tracks that are required for future drilling programs will remain.

Letlhakane - Area under rehab	FY24 (ha)
Total area cleared	21.4
Total area restored or rehabilitated	0.5
Total area under restoration or rehabilitation	0.5



Kayelekera plant nursery

# Social

## Health, Safety and Radiation Management



### Lotus' Objective

- To provide a healthy and safe work environment for all employees, contractors, and visitors.

### SDG Target

- Zero fatalities.
- Continuous reduction in the total recordable frequency injury rate (TRIFR).

### Our Performance

- No fatalities or lost time injuries recorded.
- Our TRIFR at Kayelekera increased from 0.89 in FY23 to 2.27 in FY24

### Key Policies and Procedures

- [Health, Safety and Wellbeing Policy](#)
- [Radiation Policy](#)

***Lotus has duty of care to provide a healthy and safe working environment as the wellbeing of our people is our highest priority.***

Our business is about more than the uranium in the ground. Lotus prioritises the health, safety, and wellbeing of our people, as they are the foundation of our business, and integral to our long-term success.

We strive to ensure that health and safety is integrated into everything we do by adopting a culture of continuous improvement and robust health and safety standards within the organisation. Our Board holds ultimate accountability for safety and occupational health management, overseeing strategic decisions in these areas. Our Executive Team assumes the responsibility of effectively managing health and safety within the organisation's day-to-day operations.

### HEALTH AND SAFETY MANAGEMENT

The safety and wellbeing of our people is our highest priority. We believe that everyone should be able to return home from work, safe and healthy, every day. We have a duty of care to provide a safe working environment – this is fundamental to our business.

Our approach to health, safety and radiation management is guided by our [Health, Safety and Wellbeing Policy](#) and [Radiation Policy](#) and further supported by our [Sustainability Policy](#). Lotus is committed to providing and maintaining a safe working environment for all employees, contractors and visitors. Lotus has separate health and safety management systems for Kayelekera and Letlhakane which applies to all Lotus personnel, individuals who are contracted

to work with Lotus and anyone visiting a Lotus site. These systems cover all mining and exploration activities. The management systems have been prepared in accordance with the Western Australian *Work Health and Safety Act 2020*, the Malawian *Occupational Safety, Health and Welfare Act 1997* and Botswanan *Mines, Quarries, Works and Machinery Act 1973*. It is the responsibility of all employees to act in accordance with the health and safety legislation, regulations, company policies, guidelines, and standards applicable to their work.

As such, we want to ensure health and safety is integrated into everything we do, and to do this we need to foster a safety-first culture where everyone is empowered to take responsibility for health and safety.

Our Health and Safety Management Plans (HSMP) sets out the systematic approach we use to reduce hazards, impacts, and risks, and enables us to respond appropriately so that all who visit our sites can do so safely. The management systems are regularly reviewed to enable continuous improvement, and employees are regularly consulted with to gather feedback on how to further improve the management system.

The health and safety management system at Kayelekera is administered by the SHERMT Manager and the SHR Coordinator, and the Safety Health and Environmental Officer at Letlhakane, who are tertiary educated with at least ten years' experience in the field.

## SAFETY RISK MANAGEMENT

### Hazard identification

Hazard identification and safety risk management are managed in accordance with Lotus' HSMPs. Hazard identification is the process of recognising that a hazard exists and defining its characteristic. A hazard is anything that has the potential to cause harm or damage to people, the environment, the community, plant and equipment or the company's reputation.

Risk is measured by the combination of the potential consequences and the likelihood of those consequences occurring, resulting in a risk rating. A risk assessment provides a means of focusing resources on those areas where further control of the existing hazards is required.

Lotus uses a structured approach to identify and reduce risks as far as reasonably practicable and uses four main types of risk assessment tools. The tool which is used will depend on the magnitude of the task, process, or activity that is being considered. The tools are not independent of each other and are used in conjunction with each other.

Hazard identification is an important tool. Lotus provides regular training to workers on identifying and reporting hazards. Workers are educated about the importance of reporting, how to recognise potential risks, and the procedures for reporting. Employees or contractors who remove themselves from potentially hazardous situations are commended and protected from reprisal as recognising an unsafe working environment is a key part of risk management as described in Lotus' HSMP.

Workers are encouraged to report hazards on a daily basis, directly to their supervisors. However, if an employee is uncomfortable and wishes to report a hazard or incident anonymously at Kayelekera, they can do so via a 'safety incidents box.' This gives multiple options to employees to enable them to speak up about their safety concerns without being concerned about reprisals. After a hazard has been reported, an incident report form is completed. This is followed by an investigation to determine the severity and potential impact of the hazard.



#### Hazard management tools:

- Take 5
- Job hazard analysis (JHA)
- Capturing near misses and monitoring trends
- Risk assessments



Lethakane exploration drilling campaign

## Incident Reporting and Investigation

At all of Lotus' sites, employees are encouraged to report incidents promptly to their supervisor as soon as possible and require an incident report form to be completed. All incidents are recorded in the incident register and are investigated to determine the root cause and contributing factors. Upon the conclusion of the investigation, corrective and preventative measures are implemented using the hierarchy of controls, and employees are briefed on how to minimise the risk of the incident reoccurring.

A Safety, Health, and Environment (SHE) Committee has been established at Kayelekera. This committee oversees and promotes safety, health, and environmental practices at Kayelekera, and is composed of management representatives, employees, and SHE professionals. Employee representatives are chosen based on their respective area of operation or department, and the committee also includes representatives for the contractors who work at the Kayelekera site. The committee meets each quarter, or as required for urgent matters.

## HEALTH AND SAFETY WORKER PARTICIPATION AND CONSULTATION

**Risk Assessment:** Workers actively engage in identifying hazards, assessing risks, and suggesting new control measures. Their firsthand experience offers valuable insights into potential safety concerns.

**Training and Awareness:** To ensure that workers understand the benefits of the safety and wellbeing of themselves and the organisation, they receive training on their rights and responsibilities, and how to actively contribute to health and safety initiatives.

**Safety Suggestion:** To promote continuous improvement, workers are given the opportunity to provide safety suggestions.

**Communication on Health and Safety Issues:** Worker communication is enhanced through the effective communication of health and safety issues using suggestion boxes, toolbox meetings, emails, phones, notice boards, or direct communication.

## MEDICAL PROGRAMS AND SUPPORT

Lotus has many health programs in place that help to prevent and control the spread of disease and illness. In FY24, the Kayelekera site doctor provided health awareness programs about mental health in the workforce, snake bites, tuberculosis, and non-communicable disease. The health discussion topics are selected by assessing the health and safety needs at Kayelekera and are based on injury data, employee feedback, site-specific risks, and regulatory requirements. Topics are prioritised based on their significance and potential impact on employee wellbeing.

Employees working at Kayelekera receive 100% medical aid cover, and there is a gym facility offered to all employees and contractors. Lotus also stocks anti-rabies and anti-venom vaccines for onsite emergencies and has an ambulance which also transports sick or injured people to the Village Health Centre or Karonga, if required.

At Letlhakane, Lotus provides medical assessments, medical advice and information using the 24-hour hotline, medical referrals to their regional database emergency medical services, ground and air medical evacuations to appropriate health facilities. In FY24, a toolbox meeting and prestart meeting was used to raise awareness about mental health issues and help to reduce stigma as well as drilling and radiation safety.

The Letlhakane team have established a strong relationship with local authorities, who also provide assistance in the event of emergencies.

Regular health surveillance, including medical examinations, are offered to everyone working at Lotus' sites, who are exposed or likely to be exposed to occupational hazards, with the frequency depending on the hazards to which the employee is exposed. This allows Lotus to monitor any changes in employee health status during their course of employment.

## Malaria prevention

Malaria is a key health risk in Malawi that impacts Lotus staff and local communities each year. To combat this, mitigation measures are in place to limit the contraction and spread of malaria. Indoor mosquito sprays are used to help control the spread of malaria in households surrounding the mine site. This was combined with spraying mosquito breeding habitats. Personnel returning from non-endemic areas are required to take malaria prophylaxis. All visitors are provided with malaria prevention training upon induction. Camp residents are required to wear long sleeve clothing when outdoors after 5pm. Mosquito repellents are provided to all camp residents to further prevent the spread of malaria.

## Injury Management

Lotus has an injury management program to ensure that all injuries are effectively managed to promote recovery and prevent or minimise personal and operational impact. If a person (employee, contractor or visitor) is injured on site, they are required to attend either the onsite or offsite medical centre for assessment and treatment. The injured person will receive a prompt review to establish a diagnosis and the commencement of early treatment. Following the initial treatment for an injury, a management plan and a return-to-work plan will be established.

## HEALTH AND SAFETY TRAINING

All employees and contractors who visit a Lotus site receive an initial induction upon commencement of their work for Lotus, and those who continue to work with Lotus complete an annual induction each year thereafter. This includes respectful workplace, health and wellbeing and background into radiation controls to ensure radiation safety,

and the responsibilities of personnel. Additional health and safety training is offered to employees and contractors and is targeted to be fit for purpose for planned work activities.

Safety, health, and environmental training needs are identified using a thorough organisational analysis, which results in a recognition of the organisational areas where training is most critical. This also helps to pinpoint gaps in safety protocols and address staffing needs. The training initiatives are implemented to ensure that our workforce is prepared to meet any current and future challenges we face in maintaining a safe, healthy, and environmentally responsible workplace. This targeted training approach helps in reducing workplace accidents and improving health outcomes. Supervisors are consulted to help identify employees who require additional training.

The training is delivered by qualified health and safety professionals and are structured to provide both a theoretical and practical learning experience, which allows employees to apply what they have learnt to real-world scenarios. This hands-on approach helps reinforce their new knowledge and ensure that employees can competently complete their training. A register covering employee participation in these training programs is kept, recording details of who attended, the nature of the training they received, and the date of completion. This serves a dual purpose of ensuring all employees participate in training relevant to their role and also ensuring we fulfil our legislative obligations.

The effectiveness of health and safety training is evaluated through a structured approach using the following criteria:



### Reaction criteria:

Participant's feedback is gathered to determine the adequacy of content covered, the usefulness of material used, and the delivery method



### Learning criteria:

Assessments evaluate what participants learnt to determine the immediate impact of the training on participant's knowledge and skills



### Results criteria:

Evaluates the broader impact of the training by measuring positive outcomes (e.g. reductions in accidents and injuries etc)



### Behavioural criteria:

Assesses whether the training received effectively transfers to the job and if participants are applying their new skills to their work

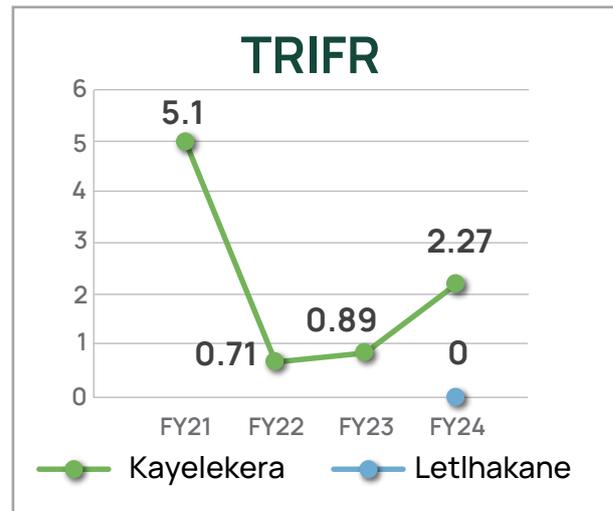
## OUR PERFORMANCE

### Health and Safety Statistics

Lotus is pleased to report there were no fatalities, Lost Time Injuries (LTI) reportable health and safety incidents or reportable work-related ill health cases in FY24 at Kayelekera or Letlhakane. There were two medically treated injuries (MTI) reported at Kayelekera, increasing the Total Recordable Injury Frequency Rate, from 0.89 in FY23 to 2.27 in FY24. Mitigation measures have been implemented to prevent the reoccurrence of the incidences.

Malaria mitigation measures, including the mosquito abatement program around Kayelekera, Sunfukwe and Chiteka, successfully reduced Malaria in the local community. However, the 12-month moving average for malaria cases increased from 24 to 61 throughout the year due to an increase in the number of new contractors commencing work at Kayelekera. All new cases in June were new contractors.

Malaria is less common in Botswana than Malawi. The Letlhakane team did not report any cases of Malaria during the reporting year.



Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
Fatalities (employees and other workers)	Number	0	0	0	0	0
High consequence work-related injuries (employees and other workers)	Number	0	0	0	0	0
Medically treated injuries	Number	4	1	1	2	0
Total recordable injury	Number	4	1	1	3	0
Total recordable injury frequency rate (TRIFR)	Rate	5.1	0.71	0.89	2.27	0
Hours worked	Number	156,879	281,244	224,364	264,535	26,818
Cases of recordable work-related ill health (employees and other workers)	Rate	-	0	0	0	0
Malaria cases	Number	28	30	24	61	0

## HEALTH AND SAFETY TRAINING

At all our sites, training needs are assessed to determine where training is required the most, such as where an activity has the highest risks, improves safety performance or provides a consistent approach to a task to enable all employees to perform their duties safely. Our targeted training approach helps to reduce workplace accidents and improve health outcomes. During FY24, the health and safety training conducted at Kayelekera included waste management, risk assessment and take 5, permit to work systems, working at heights, isolation Lock-Out-Tag-Out (LOTO) and confined space entry work permit.

Training was provided at Letlhakane by an external service provider, who is accredited by the Botswana Qualification Authority and registered with the Human Resource Development Council (HRDC). Training is offered in both English and Setswana to ensure it is comprehended and accessible and included basic fire marshal, basic first aid training, 4X4 off road training and defensive driving training. A fire drill was also conducted at the drill site to check employee's reactions to emergency situations, and feedback was given based on their response. In FY24, health and safety training was provided for all employees and contractors at Letlhakane.

## RADIATION MANAGEMENT

Both Kayelekera and Letlhakane have radiation management plans that are designed to manage radiation risks at each site. The radiation management plans align with the overarching HSMPs and assists Lotus in maintaining a high standard of radiation management. The radiation management plans were developed in accordance with the Malawi *Atomic Energy Act 2011* (Kayelekera) and *Botswana Radiation Protection Act 2006* (Letlhakane) and are based on the International Atomic Energy Agency (IAEA) Safety Standards. It allows us to utilise the best means of controlling radiation in modern uranium exploration, mining and processing, and guides us to manage radioactive waste by minimising radiation exposure, limiting access to radioactive material, effectively disposing of radioactive waste, implementing a safe system of transport and protecting the environment.

The radiation management plans are designed to be transparent and auditable, and details guidelines that offer explanations so workers, the public, and the environment are protected from radiation exposure. These guidelines are supported by site-wide procedures and Standard Operational Procedures (SOPs).

## Case Study

### First Aid Training, Fire Safety Training, and Defensive Driving Training

In FY24, several members of the Letlhakane team undertook comprehensive all-day first aid and fire marshal training, where they learnt essential life-saving skills. This training combined theory-based learning with practical hands-on experience to allow participants to gain both knowledge and skills, and was invaluable as it equipped our employees with the skills to respond confidently and effectively in emergency situations.

Additionally, 9 of our senior staff completed a two-day course covering 4WD and defensive driving. This training helps enhance their skills regarding anticipating and avoiding hazards on the road and promoted safe driving practices to operate and navigate off-road vehicles.



## Radiation and Dust Monitoring

The radiation monitoring program for Kayelekera was implemented for the mine site when it was operating. The monitoring program includes monitoring for radon gas and dust (radiometric and gravimetric).

The objectives of the monitoring program are to identify all sources of radiation exposure within the operation, to enable assessments to be made of the radiation exposure of workers and of members of the community, to permit timely detection of changes in radiation parameters, and to produce sufficient information to ensure that exposures are kept as low as reasonably practicable. The monitoring results are compared to exposure limits set by IAEA, International Commission for Radiation Protection (ICRP) and the Atomic Energy Regulatory Authority (AERA).

### OUR PERFORMANCE

#### Dust emissions

In FY24, we continued to monitor dust emissions at the Kayelekera processing plant. During the reporting period, the radiation monitoring equipment was replaced, and five new High Volume Air Samplers (HVAS) were installed. These devices were introduced at five strategic locations for dust monitoring – the ROM Pad, the main entrance gate, the camp, the process plant, and the TSF.

Gravimetric concentrations for FY24 remain low in the process plant due to low dust levels. The average of all gravimetric and radiometric analysis on the long-lived radioactive dust (LLRD) remains well below the derived limit of intake (DLI).

## Radon decay sampling

Radon decay products (radon) sampling is conducted at four strategic locations on site. All mean concentrations for radon sampling remain low compared to DLI. Results from the monitoring program show that emanation of radon follow seasonal trends, tending to increase during the dry season (May to November) and decrease during the rainy season (December to April). This is because there is a relationship between soil moisture and radon emanation with low soil moistures (dry season) having higher radon emanations and the higher soil moisture concentrations (wet season) being associated with lower emanations of radon.

## Radiation Protection Inspectorate at Letlhakane

In February 2024, personnel from the Radiation Protection Inspectorate (RPI) visited the Letlhakane Project to assess the secure storage of two radiation sources that are stored on site in accordance with the *Radiation Protection Act 2006*. During their visit, they made some management recommendations and updated company names and contact details onto the container where the radioactive sources were stored, to be utilised if any concerns arise. The Radiation Protection Inspectorate returned in June 2024, and they were satisfied with the changes that were implemented.



Kayelekera radiation monitoring equipment

# Community Relations and Engagement



## Lotus' Objective

- To support our communities and continue to communicate proactively with our local stakeholders.

## SDG Target

- Continue to engage regularly with the local stakeholders.

## Our Performance

- Regular meetings were held with community leaders.

## Key Policies and Procedures

- [Sustainability Policy](#)
- Stakeholder Engagement Plan
- Grievance Procedure

*We care about our local communities and believe that maintaining good relationships with these communities has a dual benefit of building strong local communities and enhancing business productivity.*

At Lotus, community relations and engagement involves regular and ongoing communications with the local community and stakeholders to inform and seek feedback so that we can foster meaningful and mutually beneficial relationships.

### COMMUNITY ENGAGEMENT

Community engagement at our sites involves ensuring the rights and traditions of local communities are respected, and that communities benefit from the implementation of mining activities. Our community teams actively engage with our communities to maintain positive relationships and proactively manage grievances, mitigate potential conflicts, and enhance security.

Our engagement is focused on clear communication, ongoing and regular consultation, environmental and social responsibility, and sustainable development. Engagement processes with the community include Environmental and Social Impact Assessment consultations, community meetings, stakeholder forums, community visits and meetings with local leaders, phone calls and emails.

Community engagement at Kayelekera is managed by the General Manager, and the SHERMT Manager and at Letlhakane it is managed by the External Affairs Manager.

## KAYELEKERA'S STAKEHOLDER ENGAGEMENT PLAN

Community engagement at Kayelekera is managed in accordance with the Stakeholder Engagement Plan. The Stakeholder Engagement Plan describes that engagement is to be:

- Undertaken in an open and transparent manner
- Culturally appropriate and tailored to the characteristics and interests of different stakeholders
- Disclosed in an accessible, transparent and timely manner
- Pragmatic, including regular use of meetings, workshops and consultative forums
- Free of internal or external manipulation, inference, coercion or intimidation
- Meaningful with those identified as disadvantaged or vulnerable, including the participation of women

## GRIEVANCE PROCEDURES

Kayelekera's Grievance Procedure provides support and resolutions if grievances are raised from the community. As the site is in care and maintenance, community grievances can be submitted by contacting the Kayelekera SHERMT team using WhatsApp or in person, or via communicating with Village Chiefs. The SHERMT Manager assesses any grievances received and allocates resources for their investigation, before providing a formal response. Communicating through Village Chiefs is often the most effective method for receiving feedback as many of our communities are not connected to a power grid, have limited telecommunications, and do not have ready access to vehicles. If the SHERMT Manager is unable to resolve a grievance, it is reported to the General Manager.

Grievances at Letlhakane are managed in accordance with their Community Grievance Procedure. A community grievance register is located at the community meeting place, and communities surrounding the project are kept informed of the company's exploration activities. Lotus responds to community concerns in an open, accurate and timely manner. Letlhakane's External Affairs Manager assesses any grievances received. Similar to Kayelekera's process, if the External Affairs Manager is unable to resolve a grievance, it is reported to the Country Manager.

If a grievance is unable to be resolved at a site level, it is reported to the Chief Operating Officer. If the Managing Director/CEO deems a grievance to be a critical concern for the business, it will be reported to Lotus' Board.

## OUR PERFORMANCE

No critical concerns were raised during the reporting period.

### Physical or economic displacement

None of our projects or operational sites have required physical or economic resettlement in the last ten years.

During the reporting period, Lotus worked closely with ESCOM (the owner of Malawi's power infrastructure) to select the proposed powerline route. The key criteria for selecting the powerline route was to avoid any physical resettlements and this was successfully achieved, resulting only in economic displacement.

Fair determination of compensation for land acquisition and other assets such as crops, fruit trees, or native trees has been assessed using an independent social impact assessment consultant, Department of Lands representative and a registered property valuer.

The compensation assessment process is ongoing and includes a challenge mechanism which is widely publicised to enable community members to voice a grievance or challenge land ownership.

### Kayelekera

In accordance with the Stakeholder Engagement Plan, regular and ongoing meetings were held throughout the reporting period. Quarterly meetings were held with the District Commissioner and the District Executive Committee (DEC), and six meetings with Paramount Chief Kyungu, to discuss the Mine Development Agreement (MDA), the Community Development Agreement (CDA) and the powerline project. Seven meetings were held with the Group Village Heads for Kayelekera, Juma and Simfukwe, to discuss security issues, the FY24 water treatment program and community development programs. Stakeholder engagement meetings were also held with the communities along the proposed powerline route for the Hybrid Power Strategy.

Members of government from the Malawi Environment Protection Authority, the National Water Resource Authority, the Malawi Energy Regulatory Authority, and the Ministry of Mining undertook compliance inspections and familiarisation visits.

Community leaders also participated in Kayelekera Mine site familiarisation tours.

## Case Study

### Malawi Mining Ministry visits Kayelekera Mine

The Malawian Mining Minister, the Honourable Monica Changánamuno, her team, local government officials, and His Royal Highness Paramount Chief Dr Kyungu visited the Kayelekera Mine. The Minister complimented Lotus on our high level of commitment to environmental, social, and water programs, and stated "I am very happy to visit Kayelekera and see for myself the work being done at the project. The Government of Malawi is committed to seeing Kayelekera back into production as soon as possible."



### Letlhakane

Stakeholder engagement is a priority for Lotus, and we recognise that many of our stakeholders are directly affected by the actions of the Company. Letlhakane's stakeholder engagement is centred around ensuring that all stakeholders are informed on the Company's activities to further develop the Letlhakane Project and transition from exploration to mining. Stakeholders at Letlhakane include landowners, local government organisations, communities of the local villages (Serule and Gojwana), and suppliers. Lotus meets with local police, hospital staff, Chiefs, land council members, schools and community development officers on a regular basis to ensure they are informed about Lotus' operations, and to facilitate open communication and feedback.

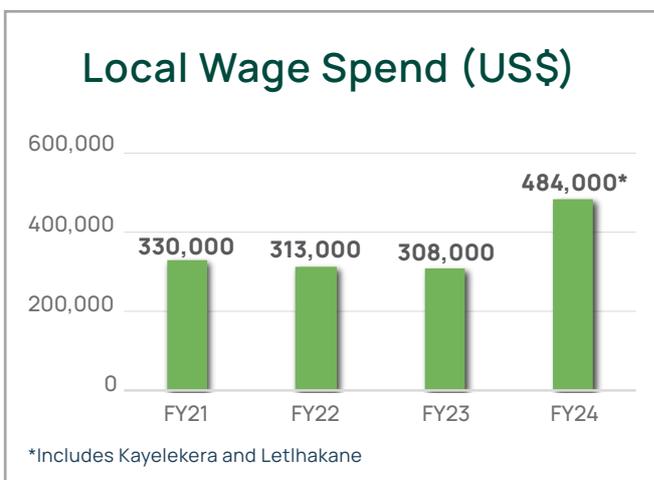
Throughout FY24, Lotus met with the District Commissioner from Tonota District Council, Land Board Chairperson from the Tonota Land Board, the Serule Chief, and the Gojwana Chief to provide project updates.

Multiple site visits were undertaken by the Water Apportionment Board, the Department of Environmental Affairs, and the Ministry of Minerals and Energy. Mine surveyors, geologists, engineers, the Director, Deputy Director, and the Director's Secretary from the Department of Mines also visited the site.

### Local recruitment

During FY24, Lotus also hired 305 contractors from the local community at Kayelekera. These included housekeeping staff, general labourers, gardeners, and welders. All staff were inducted on safety, the environment and housekeeping issues, and most staff enhanced their skills in their respective areas of work.

During FY24, Lotus engaged 25 local contractors for the Letlhakane drilling program. These roles included skilled and unskilled roles and included Geologists Senior Field Technicians, Field Technicians and Junior Field Technicians, General Assistants, and a Health, Safety and Environmental Officer.



Community engagement meeting for the proposed powerline for Kayelekera's Hybrid Power Strategy

## Community Investment - Kayelekera

### Spraying mosquito habitat to reduce the spread of Malaria

To reduce the number of malaria cases, Lotus performs an annual mosquito abatement program, which involves two spraying campaigns covering Kayelekera, Simfukwe, Juma, and Chiteka villages. The first campaign took place from the 16th to the 24th of April 2024, and encompassed 180 households, helping to improve the wellbeing of the community surrounding Kayelekera Mine.

The Malaria spraying campaign taking place



### Sere Bridge Maintenance

Lotus conducted repairs and maintenance work on the Sere Bridge, which was damaged due to large volumes of rainwater during the wet season. The bridge provides the community and Lotus safe passage across the perennial Sere River. Lotus

engaged 2 contractors and 17 locals to perform maintenance work, which included reinforcing the concrete on damaged parts of the bridge and erecting gabion baskets to strengthen the bridge against erosion.

### Guest of Honour to the Kayelekera Secondary School 2024 Graduation ceremony

Lotus has been supporting Kayelekera Secondary School through the provision of laboratory materials, teaching aids and facilitating site tours. To show their appreciation of our support, Lotus was invited as a Guest of Honour to the

Kayelekera Secondary School 2024 Graduation ceremony for the final year students to present the certificates to the best female and male students.



Ronald Kapira (Kayelekera Security Manager) presenting a certificate to the best male and female students

## Kayelekera community infrastructure maintenance and repairs

The Kayelekera Team supports the community by using its heavy machinery to repair damaged roads following the wet season rains. This reporting period, we graded the roads into Juma and Chiteka to restore access to the schools.

Lotus also used its machinery to resurface the Kayelekera Village football pitch to improve the playing surface for local competitions.

Lotus conducted maintenance at the Kayelekera Health Centre and at the homes of the medical staff. This involved repairing cracks in floors and walls, replacing windows and painting.



Kayelekera Village football pitch

## Job opportunities for local community

In August 2024, Lotus engaged 53 people from its surrounding communities to undertake a maintenance and stability program at Kayelekera. The work involved pulling down old administration and ablution buildings and leveling and compacting the site, maintenance of the western drain, maintenance of RWP2-sluice drain road and installing gabion baskets on a section affected by ground movement. This is one of the largest work programmes Lotus has been able to offer the

community since it took ownership of the Project. The work programme went for 2 months. We actively encouraged women to come work on the project and we successfully employed 10 women. Work opportunities are limited around Kayelekera. Senior Group Village Headman Kayelekera and Mwenechilanga Village Development Committee (for Kayelekera, Sinfukwe and Juma) visited Kayelekera mine site to show their appreciation for the jobs created by the project.



Workers from local communities building retaining walls at Kayelekera



**Lotus continued to support the community development programs at Kayelekera from FY23:**



**Health**

- Maintained potable water using a solar-powered pump for the Kayelekera Health Centre, Kayuni Primary School, and surrounding communities
- Provided solar power and ongoing maintenance to the Kayelekera Health Centre
- Provided an ambulance to care and transport emergency patients to the Kayelekera Health Centre or Karonga District Hospital
- Maintained the water supply and power supply at the Wiliro Health Clinic



**Education**

- Provided financial support for tuition fees, school uniforms, and books for 10 students from the St Monica Secondary School in Wiliro
- Continued to sponsor 8 teachers at Kayuni and Juma Primary Schools
- Provided mock exams and laboratory equipment for the Kayuni Primary School students sitting their high school entrance exam

**Community Investment - Letlhakane**

At Letlhakane, we have commenced evaluating ESG initiatives to understand how we can best support our local communities. Our first initiative begun in April 2024, when the Letlhakane team engaged with the local schools (Gojwane Primary School, Serule Primary School, and Bonwatlou

Community Junior Secondary School) to discuss how Lotus could support the schools. In August, we donated school furniture, uniforms, and textbooks. These items were well received and have helped improve the student's educational environment and resources.



Lotus donating furniture, uniforms, and textbooks to local schools near the Letlhakane Project.

# Labour Management and Employee Relations



## Lotus' Objective

- To ensure that all staff are adequately remunerated in accordance with national legislation.

## SDG Target

- All employees are paid above the minimum wage.

## Our Performance

- All employees and contractors are paid above the minimum wage.

## Key Policies and Procedures

- Code of Conduct
- Grievance Procedure

***Lotus is committing to ethical and sustainable labour practices that provide for a safe working environment where all personnel are treated with respect and protected from discrimination and harassment.***

Labour management and employee relations are critical to the sustainability and wellbeing of the workforce at Lotus. Effective labour management ensures that Lotus complies with necessary labour laws and remuneration requirements, reducing the risk of legal penalties, strikes, work stoppages, misconduct, and other disruptions.

### MANAGEMENT OF LABOUR RELATIONS

The Constitution of the Republic of Malawi recognises labour and employment relations as rights, not merely contractual obligations. It provides the right to economic activity, the right to work and pursue a livelihood anywhere in Malawi, the right to development, the right to fair and safe labour practices, the right to fair remuneration, and provides for freedom of association.

Lotus adheres to the various Malawi and Botswana comprehensive labour laws, including Malawi's *Labour Relations Act 1996*, the *Employment Act 1999*, the *Workers Compensation Act 1999*, and the *Pension Act 2010* and Botswana's *Employment Act 1982*, *Workers Compensation Act 1998*, *Trade Unions and Employers Organisations Act 2003*, and *Employment of Non-Citizens Act 1981*.

The purpose of these Acts is to establish, reinforce and regulate minimum standards of employment, to promote sound labour relations through the protection and promotion of freedom of association, effective collective bargaining, and orderly dispute resolution; and to make provision for the regulation of the conditions of employment in workplaces.

Labour Management and Employee Relations at Kayelekera is the responsibility of the General Manager and the Human Resources Department, who work to minimise labour management risks and facilitate strict compliance with policies and procedures and manage all human resources matters. Disciplinary measures are in place to mitigate non-compliance and promote a fair and respectable culture.

Letlhakane's Admin Manager is responsible for all human resources matters, including ensuring policies and procedures align with labour laws, managing contracts, payroll, and executing leave.

### FOSTERING EMPLOYEE WELLBEING

The employee benefits offered to the Kayelekera team include life insurance, health care, disability and invalidity cover, parental leave, and retirement provisions. The minimum notice period of one month is provided to employees and their representatives before the implementation of significant operational changes that could substantially affect them. No employees at Kayelekera are covered by collective bargaining agreements.

The employee benefits offered to the Letlhakane team include medical aid, workman's compensation, maternity leave for female employees, and severance pay. These benefits are calculated in alignment with Malawi and Botswana legislation and are clearly stated in all employment contracts.

## OUR PERFORMANCE

In November 2023, Malawi Government devalued the Kwacha by 44% against the dollar. By May 2024, another 25% devaluation followed to address ongoing economic challenges. This situation has made necessities more expensive and increased Malawi Kwacha based operational costs for businesses, leading to higher prices for consumers. To mitigate the impact of increasing cost of living, Lotus undertook an out of cycle salary increase for its permanent staff and contractor wages to help them manage the impact of the high inflation rate on their cost-of-living expenses. Lotus continued to provide meals to all contractors who were sourced from surrounding villages, assisting them in managing their own food expenses.

Lotus remunerates its employees in accordance with their national legislated requirements. In Australia, superannuation is legislated by the *Superannuation Guarantee (Administration) Act 1992*. In FY24, employers were required to pay superannuation contributions of 11% to their employees. In Malawi, there is a National Pension Scheme that requires employees contribute a minimum of 5% of their pensionable remuneration and their employer contributes at least 10% of the employee's pensionable remuneration.

Botswana's *Income Tax Act 1994* provides for severance to accrue for all employees. For the first 5 years it accrues at the equivalent of 1 day per month (calculated at the current rate of pay of disbursement date) and for the next 5 years and subsequent periods it accrues at a rate of 2 days per month. This severance is 50% tax free and 50% taxable at PAYE rates.

All employees and contractors are paid above the minimum wage requirements in jurisdictions in which we operate. The ratio of the lowest employee's salary compared with:

- Malawi's minimum wage is 2.6:1
- Botswana's minimum wage is 1.55:1.



# Diversity and Equal Opportunity



## Lotus' Objective

- To continue to build a diversified company and ensure equal employment opportunities are provided for all new roles within the business.

## SDG Target

- We are committed to increasing employment of women across the business.

## Our Performance

- Board included 20% women.
- Management team increased from 18% women in FY23 to 19% in FY24.
- Letlhakane team includes 23% women.

## Key Policies and Procedures

- [Inclusion and Diversity Policy](#)
- [Respectful Workplace Policy](#)

## *Lotus recognises and values the unique contributions and perspectives people can offer due to their different backgrounds and experiences.*

The Company's commitment includes providing a workplace free of discrimination and unfair bias, where everyone has an opportunity and where each person is valued, respected, and supported for their different attributes, skills and experience and to be treated fairly without discrimination, including on the basis of age, race, gender, marital status, political or religious belief, culture, physical or mental ability, or sexual orientation.

We recognise that an inclusive and diverse workforce is a key part of our aspiration of becoming a responsible uranium producer and is critical to building capability and enabling continuous improvement. Lotus also values the benefits that diversity contributes towards achieving our objectives, enhancing our reputation and attracting, engaging and retaining people.

Everyone at Lotus has a responsibility to embrace inclusion and diversity and be respectful and fair in the way we work with our fellow employees, contractors, supplier, and our communities. It is also the responsibility of employees to seek

advice and report any discrimination and any breach of our [Code of Conduct](#) or [Inclusion and Diversity Policy](#). Diversity and Equal Opportunity at Kayelekera is the responsibility of the General Manager and at Letlhakane, it is led by the Country Manager.

## GENDER MANAGEMENT PLAN

Lotus has developed a Gender Management Plan (GMP) in preparation for the recommencement of mining. The GMP aligns with relevant legislation, policies, and International Finance Institution standards. The aim of the GMP is to ensure that the Project positively contributes to the promotion of gender equity and equality within the workplace and beyond and that it actively promotes the wellbeing of women. The GMP provides a framework to assist Lotus in developing and implementing effective strategies around workplace culture, leadership, and employment practices to improve gender equality across the entire organisation and incorporates activities to roll out to the surrounding communities.



## OUR PERFORMANCE

As of 30 June 2024, we employed 65 people across 4 locations. Of the 65 people, we employed 13 women which is 20% of our workforce and has increased from 4 women in FY23. This has increased with the acquisition of Letlhakane and employing a female Human Resources Officer at Kayelekera. In FY24, our management team<sup>19</sup> had 16 members and was 19% female. This increased slightly from 18% in FY23.

During FY24, Kayelekera employed 17 full time permanent employees who are Malawian nationals with an additional two expatriates. The team included 3 women (16% of workforce) which increased from 2 women in FY23. A total of 369 people were engaged from labour hire companies to undertake work for Lotus at Kayelekera. These workers were hired for welding, grass cutting, housekeeping; water treatment or to work on various projects such as the demolition of the administration building, drilling activities, and drain maintenance. All labour hire contractors were sourced from local communities.

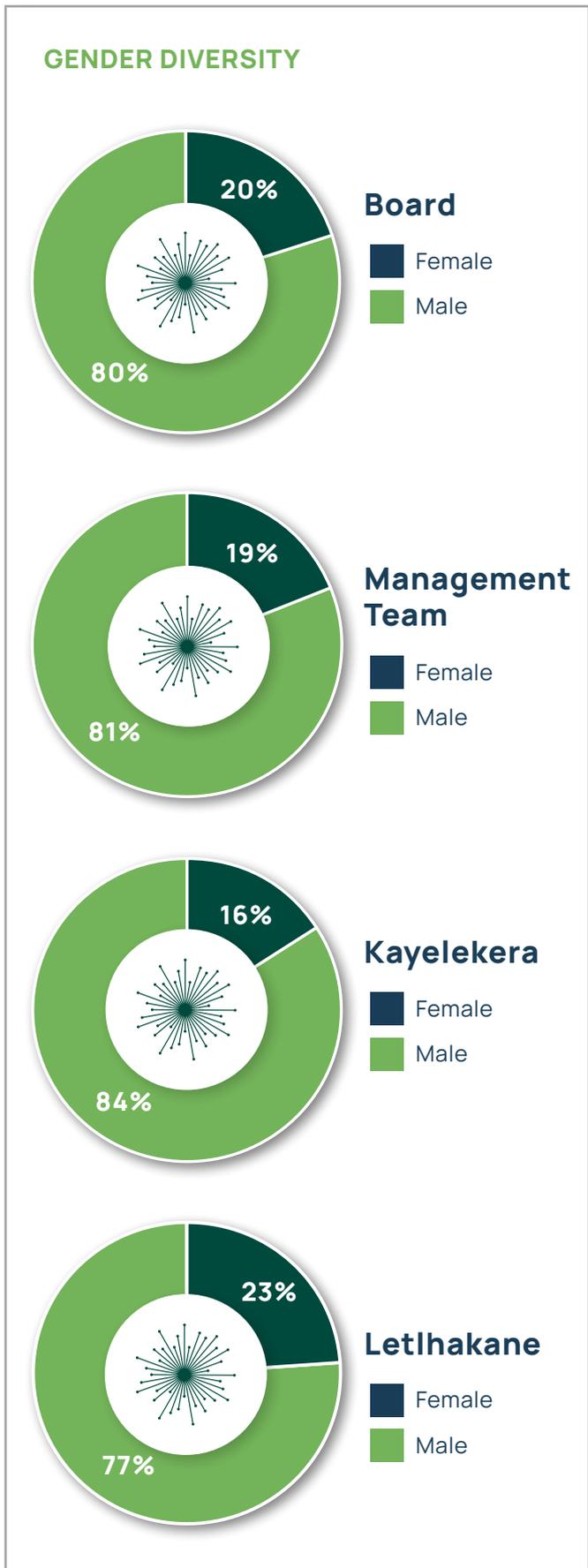
Encouraging women to work at Kayelekera was a key focus during FY24. Kayelekera's Human Resources Team has worked closely with the local labour hire contractors to actively find and recruit women to work on each project that was undertaken during the year. Of the 369 people engaged, 38 (10%) were women.

In FY24, we amended our reporting at Kayelekera to include a head count rather than full time equivalent (FTE) so we could get a better understanding of how many people we engaged to work with Lotus at Kayelekera. For this reason, we are unable to compare the number of people engaged with the FY23 results.

During FY24, the Letlhakane Team included 11 full time permanent employees, 1 part time permanent employee and 1 part time contractor.

Letlhakane is also focused on employing women. The Letlhakane team has 25% women in its management team and 23% women in the broader team. A drilling campaign commenced in May 2024 and employed 25 people on fixed term contracts. Seven women were employed for this program as Junior Geologists, Camp Assistants, General Assistants and as the site Health, Safety and Environmental Officer. The female Junior Geologist were graduates and have been trained in drilling and logging practices.

As of 30 June 2024, Lotus has not implemented employee pay bands at Kayelekera or Letlhakane. Given the number of females in the teams, we are unable to report on a meaningful ratio of the salary of women to men for each employee category.



<sup>19</sup> Includes positions titled "Manager" and above

# Governance

## Corporate Governance, Legal, and Regulatory Compliance



### Lotus' Objective

- To ensure the company complies with applicable laws and regulations.

### SDG Target

- Zero regulatory non-compliances or fines related to our sustainability performance.

### Our Performance

- Zero non-compliances with laws or regulations.
- No fines or infringement were incurred.

### Key Policies and Procedures

- [Corporate Code of Conduct](#)

***We believe that ethical business practices and strong corporate governance is critical to our success.***

### CORPORATE GOVERNANCE

Lotus and its Board are committed to conducting Lotus' business in accordance with the highest standards of corporate governance to create and deliver value for its shareholders. We believe that ethical business practices and strong corporate governance are critical for the success of our business.

Our Governance Framework is designed to comply with laws and regulations in Australia, Malawi, and Botswana, including Australia's *Corporations Act 2001* and the Securities Exchange Listing Rules (the "ASX Listing Rules"). We also report against the ASX Corporate Governance Council's Principles and Recommendations (4th Edition). Lotus' [Corporate Governance Statement](#) discloses the extent to which Lotus has followed the ASX Principles.

Our Governance Framework comprises our constitution, policies, charters, management plans and other supporting material. It guides our business activities by providing clear expectations regarding business and operational practices and ensures we have an effective level of governance for a business of our size and complexity. Our Governance Framework requires continuous improvement, and we annually review our policies and procedures to ensure they are fit for purpose. It applies to all personnel working with Lotus and includes our Company's Directors, management team, employees and contractors. By conducting business in accordance with the highest standards of corporate governance, Lotus is creating and delivering value for our stakeholders.

In implementing our sustainable development program, Lotus strives to achieve a balance between economic, environmental, and social needs in all phases of our operation. The Board of the Company aims to ensure that all stakeholders, including shareholders are informed of all company developments through ASX Announcements, Annual Reports, Half-Yearly Reports and Quarterly Reports posted on the ASX and Lotus' [website](#).

Details concerning the external assurance of financial statements and the Remuneration Report can be found in the [Annual Report](#) and the [Corporate Governance Statement](#) on Lotus' website.



## Code of Conduct

Our [Corporate Code of Conduct](#) demonstrates the principles and values that guide all activities and decision making at Lotus. It applies to the Company's Directors, management team, employees, and contractors. The Code of Conduct contains the requirement for Director's to bring their independent views and judgement to the Board and details the process for declaring any active or potential conflicts of interest. Any material breaches of the Code of Conduct are reported to the Board or a committee of the Board. See Lotus' [Annual Report](#) for details about the Company's third-party relationships and transactions.

Our Code of Conduct is supported by a suite of policies and standards that shape our business, including:

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Corporate Code of Conduct](#)
- [Continuous Disclosure Policy](#)
- [Environmental Policy](#)
- [Inclusion and Diversity Policy](#)
- [Health, Safety and Wellbeing Policy](#)
- [Human Rights Policy](#)
- [Radiation Policy](#)
- [Respectful Workplace Policy](#)
- [Remuneration Policy](#)
- [Risk Management Policy](#)
- [Shareholder Communications Strategy](#)
- [Sustainability Policy](#)
- [Whistleblower Policy](#)

## Role of the Board

Our Board is ultimately responsible for ensuring a robust system of internal controls are in place. Lotus' Board strives to conduct business in a sustainable manner and maintains oversight of all sustainability impacts and activities across the business. As of 30 June 2024, Lotus' Board comprised of four non-executive Directors and one Managing Director. It is our view that the majority of the Directors are independent including Michael Bowen, the Chairman of the Board. The Board delegates responsibility for the day-to-day operations and administration of the Company to the Managing Director/CEO.

In August 2024, Lotus restructured its Board and management team and now has two Executive Directors, three Non-executive Directors and a CEO.

The Board has the ability under the Company's Constitution to delegate its powers and responsibilities to Committees of the Board. Special Board committees have been formed to give guidance and provide oversight concerning specific matters to the Board this includes a Nomination and Remuneration Committee, Audit and Risk Committee, and Environmental, Social and Governance (ESG) Committee.

## OUR PERFORMANCE

Lotus' policy framework provides for the regular review and updates to its Company policies to ensure they remain current and fit for purpose. This allows us to make certain that our corporate activities meet current sustainability standards and expectations. In FY24, the [Share Trading Policy](#), [Continuous Disclosure Policy](#), [Human Rights Policy](#), [Radiation Policy](#), [Respectful Workplace Policy](#) and [Environmental Policy](#) were updated and approved by the Board. Lotus policies are available on its [website](#).



Anti-bribery and Corruption Training

## RISK MANAGEMENT

The Board is responsible for overseeing Lotus' risk management strategy, ensuring an appropriate corporate governance structure, and supporting the achievement of business and ESG objectives. To achieve this, the Board undertakes an annual assessment of the effectiveness of risk management and internal controls. Lotus' CFO has been delegated responsibility as Risk Coordinator and has 15 years of risk management experience reporting to Board Risk Committees including 3 years' experience as Lotus' Risk Coordinator.

Lotus' management team implement Lotus' risk management and internal control system, and reports to the Audit and Risk Committee and the Board through the Risk Coordinator. This Risk Coordinator reports on the key risks and the existing or proposed controls for each risk. The Audit and Risk Committee was chaired by Mark Hanlon, a non-executive Director in FY24, who has nine years experience as Chair of Audit and Risk Committees for four different ASX listed companies. Lotus has developed and is implementing a tailored organisational risk management approach, including a strong governance focus established at the Board level, a delegated risk committee, and a relevant risk management framework and information system for reporting. By following the AS/NZS ISO 31000:2018 Risk Management standard, Lotus is utilising best practice in defining our reporting processes to ensure operational losses and exposures are adequately reported and are managed at an appropriate level.

### Risk Register

Lotus has developed a Risk Management Framework which includes the Company's Risk Appetite and Risk Tolerance for the care and maintenance stage of the Kayelekera Mine. This document sets the scene for the level of risk the Board is willing to accept and is an important part of the Company Risk Management Framework. This Risk Appetite and Risk Tolerance will be updated as we move from care and maintenance into operations.

Lotus tracks risks through a 'Risk Register', a document that records all our identified risks, the likelihood of the consequences of that risk occurring, the actions taken to decrease the risks, and the person responsible. This process aligns with the ASX Corporate Governance Principles and Recommendations to establish an effective risk management framework.

### OUR PERFORMANCE

During the reporting period, Lotus' Risk Register was reviewed by the management team and presented to the Audit and Risk Committee for its annual review. The High risks are also presented to the Board as a standard agenda item at Board meetings.



## LEGAL AND REGULATORY COMPLIANCE

Legal and regulatory compliance is a core responsibility for the Board and our company officers. Effective and robust corporate governance is required to support our personnel to make the right decisions and uphold the Company's responsibilities to its stakeholders. Having a strong corporate culture ensures we meet our objectives to create long term shareholder value and deliver on the values and purpose that the Company is built on. We strive to act in accordance with all legal and regulatory obligations and to have a positive impact in the jurisdictions in which we operate.

The Perth Corporate Team works closely with the Kayelekera and Letlhakane teams to regularly review and evaluate compliance for corporate activities and site operations. Consultants, including local advisors, are engaged to assist in understanding the local and international regulatory regime and to ensure legal and compliance obligations are met.

We ensure that the Kayelekera and Letlhakane teams has appropriate training and understand the applicable licence requirements and regulations relevant for operational matters during the care and maintenance and exploration phase. The Kayelekera and Letlhakane teams liaise with the Corporate Team when additional assistance is required.

Lotus operates within all relevant national and international legal frameworks that impact our daily business. We have developed procedures and principles to remain compliant and to foster good working relationships with all regulatory authorities.

The Kayelekera Team regularly engages with the Malawi Revenue Authority (MRA), the Malawi Environment Protection Authority (MEPA), Atomic Energy Regulatory Authority (AERA), Department of Environmental Affairs, National Water Resources Authority (NWRA), Ministry of Mines, Karonga District Commissioner (District Environmental Office) and the Malawi Energy Regulatory Authority (MERA).

The Letlhakane Team regularly engages with the Botswana Department of Mines, Department of Environmental Affairs, Radiation Protection Inspectorate, and Department of Water Affairs and Sanitation.

## OUR PERFORMANCE

Kayelekera operates under an Environmental Licence granted under the Malawian environmental legislation. The conditions of the Environmental Licence are implemented through our Care and Maintenance Environmental Management Plan. The site prepares daily and monthly reports to communicate safety, health, environment and radiation performance (SHER) and an annual audit is undertaken by MEPA, AERA, Ministry of Mines and NWRA.

Letlhakane operates its activities in accordance with the Programme of Works approved for ML2016/16L and PL2482/2023 and associated management plans such as the Safety, Health, Radiation, Environment and Community (SHREC) Management Plan.

During the reporting period, Lotus sought approval to renew its annual and biannual licences. Since Lotus has acquired the Kayelekera and Letlhakane Projects, there have been no instances of non-compliance with laws and regulations resulting in fines or monetary sanctions. There were no breaches of the Code of Conduct during FY24.



Kayelekera Processing Plant

# Ethics, Human Rights, Anti-Bribery and Corruption



## Lotus' Objective

- To detect and prevent fraud and corrupt practices across our operations.
- To ensure that every employee, contractor, and supplier is aware of their responsibility to respect human rights and to demonstrate safe and respectful behaviour.

## SDG Target

- Zero anti-bribery and corruption non-compliance.
- 100% of security trained in the Voluntary Principles Initiative on security and human rights.

## Our Performance

- Zero corruption incidents reported at Letlhakane and Kayelekera.
- Zero Human rights violations reported.
- 100% of Kayelekera security contractors trained in human rights.

## Key Policies and Procedures

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Human Rights Policy](#)
- [Corporate Code of Conduct](#)
- [Speak Up \(Whistleblower\) Policy](#)

## *Lotus has a strong ethical culture that does not tolerate corrupt behaviour.*

We promote a culture of acting ethically with honesty, transparency, and openness in all that we do, and we act in accordance with applicable anti-bribery and corruption laws, including those in Malawi, Botswana and Australia. We uphold our commitment to ethical business practice, anti-bribery and anti-corruption through our [Code of Conduct](#), our [Anti-Bribery and Anti-Corruption Policy](#), and our [Speak Up \(Whistleblower\) Policy](#), which apply to all staff, third-parties, representatives, and joint venture partners.

Human rights are defined by the United Nations as the rights that are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from torture and slavery, freedom of opinion and expression, and the right to work and education. Everyone is entitled to these rights, without discrimination.

“ We value the fundamental human rights recognised in the Universal Declaration of Human Rights (UDHR) and strive to operate our business in accordance with the spirit and intent of it.

- Lotus' Universal Declaration of Human Rights (UDHR) Statement ”

We aspire to be a company that recognises and respects the rights and dignity of all people by incorporating human rights into all our decision-making and business processes. We recognise that evaluating, preventing, and mitigating any potential for adverse human rights impacts is essential to our long-term success.

Lotus' Board oversees the management and administration of the [Anti-Bribery and Anti-Corruption Policy](#), and the [Speak Up \(Whistleblower\) Policy](#), ensuring that ethical decision-making is performed to a high standard. These policies provide that all employees are tasked with reporting suspected corrupt conduct. Lotus' onboarding process includes training for all employees and contractors to identify bribery, fraud, and corruption, their responsibilities, and prohibited behaviour while working with Lotus or at any of our sites.



## ANTI-BRIBERY AND ANTI-CORRUPTION

Lotus' [Anti-Bribery and Anti-Corruption Policy](#) details our requirements for interacting with officials and third parties, such as business associates, to ensure we limit corruption with our business. Additionally, all employees and contractors receive corruption and awareness training, and there are anti-bribery and corruption posters installed in all offices, ablution blocks, and common areas where employees interact. These practices help us to reinforce the commitment we have made to acting fairly, honestly with integrity, and in compliance with all relevant laws, rules, and regulations.

We are currently updating our processes for assessing corruption within the business, including developing a new management system of how to define corruption and impact rating, as well as implementing a new training processes.

## SPEAK UP (WHISTLEBLOWER)

Lotus' [Speak Up \(Whistleblower\) Policy](#) enables individuals to report concerns about the Company's operations or business relationships which they believe are illegal or unethical behaviour without being concerned about reprisal. The policy aligns with the ASX Corporate Governance Principles and Recommendations and applies to all personnel. Any concerns or incidents in relation to corruption are encouraged to be reported to their Supervisor, General Manager, Managing Director (MD) or Company Secretary either by telephone, email, letter or in person.

The Company recognises that there may be issues of sensitivity whereby a discloser does not feel comfortable to make a report to an internal recipient. In such cases, the discloser may feel more comfortable making an anonymous disclosure. All reported incidents will be investigated and reported to the MD/CEO and the Board.

## HUMAN RIGHTS AND SECURITY

Human rights are particularly important for managing security around the Kayelekera mine site. Due to the location where the mine is located, it is subject to a number of potential theft incidents. Lotus has two levels of security. It employs an independent security company and engages the local police to support in providing security for the mine. Both the security company and the local police undertake training in human rights.

Security at Letlhakane is focused on the protection of the company's assets, including core shed, and protection of the general public from any exposure to radioactive sources. All security staff comply with Botswana and local laws and regulations, and update the community, landowners, law-enforcement, and regulatory agencies on exploration activities.

## OUR PERFORMANCE

During FY24, there were no corruption incidents reported at Kayelekera or Letlhakane. During the reporting period, two employees received training on anti-corruption and anti-bribery training. These employees are assisting in the developing of the revised management systems for mitigating corruption.

During FY24, Lotus developed a Human Rights statement to show our commitment to operating in alignment with the United Nations Universal Declaration of Human Rights. This statement has been added to our [Human Rights Policy](#).

At both Kayelekera and Letlhakane, there were no incidents involving violations of the rights of local or Indigenous people during FY24.

### Training

Lotus has focused on increasing security training throughout the reporting period, and engaged a qualified trainer on security and human rights from G4S to train the security officers at Kayelekera. The training focuses on Malawi legislation, UN Basic Human Rights Standards for Law Enforcement, Private (self) defence, the Voluntary Principles on Security and Human Rights (VPSHR), the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, and the Amnesty International 10 Basic Human Rights Standards for Law Enforcement Officials. Throughout FY24, an additional 22 staff and 13 community members at Kayelekera completed formal G4S human rights training. 12 security guards also undertook refresher training on guarding and patrolling, and observation and access control management. The remainder of the security contractors completed their security and human rights training in FY22 and FY23.

At the Letlhakane Project, there are 3 security staff employed from the local village, whose role includes patrolling the site. This allows the camp to receive 24/7 security enforcement, and no events of forced entry or stealing have been encountered. Lotus intends to conduct security and human rights training for Letlhakane staff in FY25.

# Economic Performance and Financial Management



## Lotus' Objective

- To ensure efficient use of shareholder's funds while prioritising expenditure with local businesses.

## SDG Target

- Continue to identify opportunities to increase local procurement in Malawi and Botswana.

## Our Performance

- US\$2.57m on purchases from local suppliers.

## Key Policies and Procedures

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Risk Management Policy](#)

## *Lotus seeks to maximise long-term value creation in a sustainable manner.*

This is achieved through effective stewardship of shareholder funds to ensure that they are utilised in a targeted manner to meet the objectives set out by the Board. We fulfil this commitment by:

- Setting long-term strategy and goals
- Regularly reviewing the long-term strategy and elements that flow into the annual strategy to ensure that opportunities are pursued, and revisions are made where appropriate
- Preparing an annual strategy and budget, and reporting monthly to Management and the Board
- Daily and monthly reporting of financial and non-financial information from site operations
- Setting authority limits to ensure that decisions are made at the right level within the organisation

- Regularly reviewing risks to ensure that funds are applied to risk mitigation actions or controls
- Implementing internal controls around financial processes and asset protection and performing checks to confirm effectiveness
- Annual statutory audit for the group and subsidiaries.

The Company prepares budgets based on our different business levels including site operations, exploration, capital projects and corporate matters. These are then merged to make up the Company budget. The main responsibility for the corporate budget lies with the Managing Director/CEO.

**Lotus continues to support the Malawi Extractive Industries Transparency Initiative (MEITI) and has reported its contributions to Malawi' extractive sector since FY21.**



Geologists logging drill samples at Lethakane

## OUR PERFORMANCE

Lotus is focused on prioritising local suppliers. In FY24, Lotus made purchases of US\$1,753,000 from local suppliers in Malawi and US\$818,000 from local suppliers in Botswana. This was approximately 73% and 76% of Lotus' procurement budgets, respectively.

No financial assistance was received from the Malawian Government during the reporting period.

No donations were provided to political campaigns in FY24

The majority of economic performance data provided in the table has increased as it now includes Kayelekera and Letlhakane financial information.

Economic Performance	Unit	FY21	FY22	FY23	FY24
Kayelekera Care & Maintenance Expenditure	\$USD	1,885,000	2,147,000	1,759,000	1,847,000
Kayelekera Exploration and Capital Costs	\$USD	239,000	2,369,000	377,000	928,000
Letlhakane Exploration and Evaluation Costs	\$USD	-	-	-	1,066,000
Government Payments (Taxes & fees for licences & permits)	\$USD	257,000	323,000	354,000	304,000
Procurement from local Botswana and Malawian businesses	\$USD	596,000	2,511,000	1,592,000	2,571,000
Social Development Projects	\$USD	14,000	20,000	25,000	17,000

\* No royalties were payable due to Kayelekera and Letlhakane not being in production



# Cybersecurity and Data Management



## Lotus' Objective

- To prevent breaches of cybersecurity resulting in the loss of confidentiality, availability, or integrity of the Company's data.

## SDG Target

- Zero data losses and business interruption.

## Our Performance

- 1 cybersecurity incident
- No loss of sensitive data occurred

## Key Policies and Procedures

- Data Management Plan

## Effective data management and cybersecurity practices are crucial to our business

Cybersecurity is critical in the world today as a cyberattack can disrupt business operations, causing downtime and loss of productivity. Ensuring that our company has an effective cybersecurity strategy in place helps maintain the continuity of our operations and minimises the potential for costly interruptions. Similarly a robust data management systems also essential for our business as it protects one of the most valuable assets of the Company. It is fundamental that Company data is appropriately collected, processed, validated, and stored in an organised and efficient manner.

Lotus' Risk Management Framework utilises effective systems for suitable cybersecurity and allows us to make certain that we are meeting all applicable legislative requirements from Australia, Malawi, and Botswana. Lotus' Board is ultimately responsible for Cybersecurity and Data Management but delegates day-to-day management to Lotus' Managing Director/CEO and CFO.

Lotus employs a third party to implement and manage effective cybersecurity mechanisms for its operations.

### CYBERSECURITY PROTECTION MEASURES

We have implemented a number of procedures to help encourage cybersecurity protection within the Company, including:

- Performing regular software updates, data backups, and patches for data protection
- Adopting multi-factor authentication (MFA) on key systems that have access to data files
- Training employees on cyber security risks
- Educating employees on how to identify email scams
- Using current IT hardware with uninterruptable power supplies
- Completing upgrades on our operating systems to allow for the most up-to-date security measures.

### OUR PERFORMANCE

The Company takes a continuous improvement approach to managing cybersecurity risks with periodic reviews undertaken against the Essential 8 methodology for all business units with the aim of increasing the organisations cybersecurity maturity. We have implemented a number of procedures to help encourage cybersecurity protection within the Company, including:

- Performing regular software and operating system updates according to a hierarchy of criticality to ensure that systems and applications are supported and allow for the most up-to-date security measures
- Reviewing and improving data backup processes and implementing an IT Disaster Recovery Plan for business continuity and data protection
- Adopting multi-factor authentication (MFA) on key systems that have access to data files
- Training employees on cyber security risks and best practices
- Using current IT hardware supported by uninterruptable power supplies where relevant

Our employees in Malawi, Botswana and Australia also participate in monthly training sessions on cybersecurity. The training aims to educate and inform users on their responsibilities in respect to cybersecurity, and how to prevent incidents or breaches, and how to act in the event of a cybersecurity incident or breach.

There was 1 cybersecurity incident reported during the reporting period, however no loss of sensitive data occurred.

In the last three years (in FY22 and FY24), we had two cybersecurity incidents which were detected quickly by our IT support company. Lotus' security measures proved effective with incident avoiding any unauthorised access to systems or loss of company data.

# Performance Data

Table notes:

- = No record

0 = Result was zero

## Workforce Profile - Employees

Parameter	Unit	FY22		FY23		FY24		
		Corporate	Kayelekera	Corporate	Kayelekera	Corporate	Kayelekera	Letlhakane
<b>Permanent employees</b>								
Total	Number	2	19	2	19	4	19	11
Male	Number	2	17	2	17	4	16	9
Female	Number	0	2	0	2	0	3	2
Expat	Number	2	2	2	2	0	2	1
National	Number	0	17	0	17	4	17	10
Aged over 50	Number	-	5	1	5	3	5	5
Aged 30-50	Number	-	14	1	14	1	14	6
Aged under 30	Number	-	0	0	0	0	0	0
<b>Temporary employees</b>								
Total	Number	0	0	0	25	0	0	25
Male	Number	0	0	0	20	0	0	18
Female	Number	0	0	0	5	0	0	7
Expat	Number	0	0	0	0	0	0	0
National	Number	0	0	0	25	0	0	25
Aged over 50	Number	0	0	0	0	0	0	1
Aged 30-50	Number	0	0	0	25	0	0	21
Aged under 30	Number	0	0	0	0	0	0	3
<b>Full-time employees</b>								
Total	Number	2	19	2	19	4	19	11
Male	Number	2	17	2	15	4	16	9
Female	Number	0	2	0	2	0	3	2
Expat	Number	0	2	0	2	0	2	1
National	Number	2	17	2	17	4	17	10
Aged over 50	Number	1	5	1	5	3	5	5
Aged 30-50	Number	1	14	1	14	1	14	6
Aged under 30	Number	0	0	0	0	0	0	0
<b>Part-time employees</b>								
Total	Number	0	0	0	0	1	0	25
Male	Number	0	0	0	0	1	0	18
Female	Number	0	0	0	0	0	0	7
Expat	Number	0	0	0	0	0	0	0
National	Number	0	0	0	0	1	0	25
Aged over 50	Number	0	0	0	0	1	0	1
Aged 30-50	Number	0	0	0	0	0	0	21
Aged under 30	Number	0	0	0	0	0	0	3
<b>Casual employees</b>								
Total	Number	0	17	0	17	1	0	3
Male	Number	0	15	0	15	0	0	3
Female	Number	0	2	0	2	1	0	0
Expat	Number	0	0	0	0	0	0	0
National	Number	0	17	0	17	1	0	3
Aged over 50	Number	0	-	0	-	0	0	-
Aged 30-50	Number	0	-	0	-	0	0	-
Aged under 30	Number	0	-	0	-	1	0	-

## Workforce Profile – Contractors

Parameter	Unit	FY22		FY23		FY24		
		Corporate	Kayelekera	Corporate	Kayelekera	Corporate	Kayelekera	Letlhakane
<b>Contractors</b>								
Number of contractors (Head Count)	Number	3	-	3	56	4	369	1

## New Employees

Parameter	Unit	FY23		FY24		
		Corporate	Kayelekera	Corporate	Kayelekera	Letlhakane
Total	Number	1	0	3	1	11
Male	Number	0	0	2	0	9
Female	Number	1	0	0	1	2
Expat	Number	0	0	0	0	1
National	Number	1	0	2	1	10
Aged over 50	Number	0	0	2	0	5
Aged 30-50	Number	0	0	0	1	6
Aged under 30	Number	1	0	0	0	0

## Human Rights

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
Security personnel who have been trained in the organisation's human rights policies or procedures applying to security	%	-	0	100	100	0
Incidents of violations involving the rights of Indigenous people	Number	0	0	0	0	0
Operations that have been subject to human rights reviews or impact assessments	Number	0	0	0	0	0

## Diversity of Governance Bodies and Employees

Parameter	Unit	FY22	FY23	FY24
Total individuals within the governance bodies	Number	5	5	5
Male	Number	4	4	4
	%	80	80	80
Female	Number	1	1	1
	%	20	20	20
Over 50	Number	5	5	5
	%	100	100	100
30-50	Number	0	0	0
	%	0	0	0
Under 30	Number	0	0	0
	%	0	0	0

## Anti-Corruption

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
Confirmed incidents of corruption	Number	1	0	1	0	0
Total corruption incidents where employees were dismissed or disciplined for corruption	Number	1	0	0	0	0
Total corruption incidents where contracts with business partners were terminated or not renewed due to corruption	Number	0	0	0	0	0
Total operations assessed for corruption risks*	Number	4	5	6	-	-
	%	50	62.5	50	-	-

\*We are currently updating our processes for assessing corruption within the business

## Energy Consumption

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
Stationary fuel consumption	L	552,230	694,884	283,863	343,894	0
Mobile consumption	L	36,374	32,655	40,608	86,423	46,681
Total diesel consumption	L	588,604	727,539	324,471	430,317	13,698
Total petrol consumption	L	-	-	-	0	10,481
Total fuel consumption within the organization from non-renewable sources, including fuel types used	L	588,604	727,539	324,471	430,317	13,698
Total energy consumption	GJ	21,461	26,472	12,424	16,477	1,815
Energy intensity	GJ/unit		NA	NA	NA	NA
Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives	GJ	-	-	-	-	0

## Greenhouse Gas Emissions

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
<b>Direct (Scope 1) GHG emissions</b>						
Total Scope 1 emissions	t CO <sub>2</sub> -e	1,504	1,859	1,132	1,174	129
Scope 1 emissions biogenic CO <sub>2</sub> emissions	Metric tons	NA	NA	NA	NA	NA
<b>Indirect (Scope 2) GHG emissions</b>						
Total Scope 2 emissions	t CO <sub>2</sub> -e	0	0	0	0	21
Scope 2 emissions biogenic CO <sub>2</sub> emissions	Metric tons	NA	NA	NA	0	NA
<b>Other indirect (Scope 3) GHG emissions</b>						
GHG emissions intensity ratio for the organization	t CO <sub>2</sub> -e	NA	NA	NA	NA	NA
Total Scope 3 emissions	t CO <sub>2</sub> -e	-	-	-	-	-
Scope 3 emissions biogenic CO <sub>2</sub> emissions	Metric tons	-	-	-	-	-

## Water

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
<b>Water withdrawal</b>						
Total surface water withdrawn*	(m <sup>3</sup> )	-	-	-	-	-
Total other water (groundwater, seawater, produced water) withdrawn	(m <sup>3</sup> )	0	0	0	0	0
Total water withdrawn from all water stress areas	(m <sup>3</sup> )	0	0	0	0	0
<b>Water discharged</b>						
Total water discharged to all areas	(m <sup>3</sup> )	554,582	765,361	286,800	323,803	0
Surface water	(m <sup>3</sup> )	554,582	765,361	286,800	323,803	0
Other water (groundwater, sea water, produced water) discharged	(m <sup>3</sup> )	0	0	0	0	0
Total water discharged to water stress areas	(m <sup>3</sup> )	0	0	0	0	0
<b>Water consumed</b>						
Total water consumed from all areas	(m <sup>3</sup> )	-	-	-	-	-
Total water consumption from all areas with water stress	(m <sup>3</sup> )	0	0	0	0	0
Third-party water	(m <sup>3</sup> )	0	0	0	0	0

\*Surface water withdrawal and consumption was not recorded during the reporting period.

## Occupational Health and Safety Management Systems

Parameter	Unit	Kayelekera		Letlhakane
		FY23	FY24	FY24
Occupational Health and Safety Management Systems	%	100	100	100
Employees covered by OHS management system	%	100	100	100
Other workers covered by OHS management system	%	100	100	100
Employees and other workers covered by internally or externally audited OHS management system*	%	0	0	0

\*Lotus has not audited its OHS systems as Kayelekera has been in Care and Maintenance. Lotus will commence OHS audits following the recommencement of mining.

## Incidents of Discrimination

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
Total incidents of discrimination during the reporting period	Number	-	0	0	0	0

## Local Communities

Parameter	Unit	Kayelekera				Letlhakane
		FY21	FY22	FY23	FY24	FY24
Percentage of operations with implemented local community engagement, impact assessment, and/or development programs	%	100	100	100	100	100
Percentage of operations with implemented social impact assessment	%	-	100	100	100	100
Percentage of operations with implemented environmental impact assessment	%	100	100	100	100	100
Percentage of operations with broad based local community consultation committees and processes that include vulnerable groups;	%	100	100	100	100	100
Works councils, occupational health and safety committees and other worker representation bodies to deal with impacts;	%	-	-	-	100	0
Formal local community grievance processes.	%	100	100	100	100	100

## Waste

Parameter	Unit	FY21	FY22	FY23	FY24
<b>Waste generated</b>					
Total	m <sup>3</sup>	7,507	15,866	7,531	320
Hazardous	m <sup>3</sup>	7,483	15,844	7,407	75*
Non-hazardous	m <sup>3</sup>	24	20	123	245
<b>Waste recycled</b>					
Hazardous	m <sup>3</sup>	0	0	0	0.15
Non-hazardous	m <sup>3</sup>	1.2	1.4	52	89
<b>Waste diverted from disposal</b>					
Total	m <sup>3</sup>	1.2	1.4	52	75
Total hazardous	m <sup>3</sup>	0	0	0	0.19
Hazardous waste diverted for preparation for reuse	m <sup>3</sup>	0	0	0	0
Hazardous waste diverted for recycling	m <sup>3</sup>	0	0	0	0.15
Hazardous waste diverted for other recovery operations	m <sup>3</sup>	0	0	0	0
Hazardous waste diverted from disposal onsite	m <sup>3</sup>	0	0	0	0.04
Hazardous waste diverted from disposal offsite	m <sup>3</sup>	0	0	0	0.15
Total non-hazardous	m <sup>3</sup>	1.2	1.4	52	75
Non-hazardous waste diverted for preparation for reuse	m <sup>3</sup>	0	0	0	0
Non-hazardous waste diverted for recycling	m <sup>3</sup>	1.2	1.4	52	75
Non-hazardous waste diverted for other recovery operations	m <sup>3</sup>	0	0	0	0
Non-hazardous waste diverted from disposal onsite	m <sup>3</sup>	1.2	1.4	52	75
Non-hazardous waste diverted from disposal offsite	m <sup>3</sup>	0	0	0	0
<b>Waste directed to disposal</b>					
Total	m <sup>3</sup>	7,507	15,866	7,531	245
Total hazardous	m <sup>3</sup>	7,483	15,844	7,407	75
Hazardous waste directed for incineration with energy recovery	m <sup>3</sup>	0	0	0	0
Hazardous waste directed for incineration without energy recovery	m <sup>3</sup>	0	0	0	5
Hazardous waste directed for landfill	m <sup>3</sup>	0	0	0	9
Hazardous waste directed for other disposal operations	m <sup>3</sup>	0	0	0	60
Hazardous waste directed for disposal offsite	m <sup>3</sup>	0	0	0	0.15
Hazardous waste directed for disposal onsite	m <sup>3</sup>	7,483	15,844	7,407	15
Total non-hazardous	m <sup>3</sup>	24	20	123	170
Non-hazardous waste directed for incineration with energy recovery	m <sup>3</sup>	0	0	0	0
Non-hazardous waste directed for incineration without energy recovery	m <sup>3</sup>	0	0	0	0
Non-hazardous waste directed for landfill	m <sup>3</sup>	0	0	0	65
Non-hazardous waste directed for other disposal operations	m <sup>3</sup>	0	0	0	105
Non-hazardous waste directed for disposal offsite	m <sup>3</sup>	0	0	0	13
Non-hazardous waste directed for disposal onsite	m <sup>3</sup>	0	0	0	170

\*The volume of water treatment sludge was not recorded as the monitoring equipment malfunctioned during the water treatment process.

# GRI Content Index

Lotus Resources Limited has reported the information cited in this GRI context index for the period 1 July 2023 to 30 June 2024 with reference to the GRI Universal Standards 2021 and the GRI Mining Sector Standards 2024.

Disclosure Number	Disclosure Title	Location or Explanation
<b>GRI 2: General Disclosures 2021</b>		
2.1	Organisational details	About Lotus Resources – Page 8
2.2	Entities included in the organisation's sustainability reporting	About Lotus Resources – Page 8
2.3	Reporting period, frequency and contact point	About This Report – Page 7
2.4	Restatement information	There have been no restatements to the 2023 Sustainability Report
2.5	External assurance	About This Report – Page 7
2.6	Activities, value chain and other business relationships	Materiality – Page 17 Supply Chain – Page 18
2.7	Employees	Performance Data – Page 61 and 62
2.8	Workers who are not employees	Performance Data – Page 62
2.9	Governance structure and composition	Corporate Governance, Legal and Regulatory Compliance – Page 53 and 54 <a href="#">Corporate Governance Statement</a> – Page 5, 6 and 7
2.10	Nomination and selection of the highest governance body	<a href="#">Corporate Governance Statement</a> - Page 3 and 4
2.11	Chair of the highest governance body	Corporate Governance, Legal and Regulatory Compliance – Page 53 <a href="#">Corporate Governance Statement</a> - Page 10 <a href="#">Board Charter</a> - Page 3
2.12	Role of the highest governance body in overseeing the management of impacts	Corporate Governance, Legal and Regulatory Compliance – Page 53 <a href="#">Corporate Governance Statement</a> - Page 1, 2 and 16 <a href="#">Board Charter</a> - Page 1
2.13	Delegation of responsibility for managing impacts	Corporate Governance, Legal and Regulatory Compliance – Page 53 <a href="#">Corporate Governance Statement</a> – Page 5
2.14	Role of the highest governance body in sustainability reporting	Materiality – Page 17 <a href="#">ESG Committee Charter</a> – Page 1
2.15	Conflicts of interest	Corporate Governance, Legal and Regulatory Compliance – Page 53 <a href="#">Corporate Governance Statement</a> - Page 3, 10 and 11 <a href="#">Board Charter</a> - Page 3
2.16	Communication of critical concerns	Community Relations and Engagement – Page 43
2.17	Collective knowledge of the highest governance body	<a href="#">Corporate Governance Statement</a> - Page 6
2.18	Evaluation of the performance of the highest governance body	<a href="#">Board Charter</a> – Page 5 <a href="#">Corporate Governance Statement</a> – Page 4 and 5
2.19	Remuneration policies	<a href="#">2024 Annual Report</a>
2.20	Process to determine remuneration	<a href="#">2024 Annual Report</a>
2.22	Statement on sustainable development strategy	Sustainability Committee Chair's Message – Page 5 and 6
2.23	Policy commitments	Ethics, Human Rights, Anti-Bribery and Corruption – Page 56 and 57
2.24	Embedding policy commitments	Ethics, Human Rights, Anti-Bribery and Corruption – Page 56 and 57
2.25	Process to remediate negative impacts	Community Relations and Engagement – Page 43
2.26	Mechanisms for seeking advice and raising concerns	Community Relations and Engagement – Page 43 Ethics, Human Rights, Anti-Bribery and Corruption – Page 57

Disclosure Number	Disclosure Title	Location or Explanation
<b>GRI 2: General Disclosures 2021 (continued)</b>		
2.27	Compliance with laws and regulations	Corporate Governance, Legal, and Regulatory Compliance – Page 52 and 55
2.28	Membership associations	About This Report – Page 7
2.29	Approach to stakeholder engagement	Sustainability at Lotus – Page 15 Summary of Stakeholder Engagement – Page 16 Community Relations and Engagement – Page 42 and 44
<b>GRI 3: Material Topics 2021</b>		
3.1	Process to determine material topics	Materiality – Page 17
3.2	List of material topics	Materiality – Page 17
<b>GRI 101: Biodiversity 2024</b>		
3.3	Management of biodiversity	Catchment Management and Mine Rehabilitation – Page 31
101.1	Policies to halt and reverse biodiversity loss	Catchment Management and Mine Rehabilitation – Page 31 and 32
101.2	Management of biodiversity impacts	Catchment Management and Mine Rehabilitation – Page 33 and 34
101.4	Identification of biodiversity impacts	Catchment Management and Mine Rehabilitation – Page 31 and 32
101.5	Locations with biodiversity impacts	Catchment Management and Mine Rehabilitation – Page 31, 32 and 34
101.6	Direct drivers of biodiversity loss	Catchment Management and Mine Rehabilitation – Page 34
101.7	Changes to the state of biodiversity	Catchment Management and Mine Rehabilitation – Page 31 and 32
101.8	Ecosystem services	Catchment Management and Mine Rehabilitation – Page 31 and 32
<b>GRI 201: Economic Performance 2016</b>		
3.3	Management of economic performance	Economic Performance and Financial Management – Page 58
201.1	Direct economic value generated and distributed	<a href="#">2024 Annual Report</a>
201.2	Financial implications and other risks and opportunities due to climate change	Climate Change and Energy Management – Page 30
201.3	Defined benefit plan obligations and other retirement plans	<a href="#">2024 Annual Report</a>
201.4	Financial assistance received from government	Economic Performance and Financial Management – Page 59
<b>GRI 202: Market Presence 2016</b>		
3.3	Management of market presence	Labour Management and Employee Relations – Page 48 Diversity and Equal Opportunity – Page 50 Economic Performance and Financial Management – Page 58
202.1	Ratios of standard entry level wage by gender compared to local minimum wage	Diversity and Equal Opportunity – Page 51 Labour Management and Employee Relations – Page 49
202.2	Proportion of senior management hired from the local community	Community Relations and Engagement – Page 44 Supply Chain – Page 18
<b>GRI 203: Indirect Economic Impacts 2016</b>		
203.1	Infrastructure investments and services supported	Community Relations and Engagement – Page 45, 46 and 47
203.2	Significant indirect economic impacts	Community Relations and Engagement – Page 44 Economic Performance and Financial Management – Page 59
<b>GRI 204: Procurement Practices 2016</b>		
3.3	Management of procurement practices	Economic Performance and Financial Management – Page 58 Labour Management and Employee Relations – Page 48
204.1	Proportion of spending on local suppliers	Economic Performance and Financial Management – Page 59
<b>GRI 205: Anti-corruption 2016</b>		
3.3	Management of anti-corruption	Ethics, Human Rights, Anti-Bribery and Corruption – Page 56
205.1	Operations assessed for risk related to corruption	Performance Data – Page 63
205.2	Communication and training about anti-corruption policies and procedures	Ethics, Human Rights, Anti-Bribery and Corruption – Page 57
205.3	Confirmed incidents of corruption and actions taken	Ethics, Human Rights, Anti-Bribery and Corruption – Page 57 Performance Data – Page 63

Disclosure Number	Disclosure Title	Location or Explanation
<b>GRI 302: Energy 2016</b>		
3.3	Management of energy	Climate Change and Energy Management – Page 26
302.1	Energy consumption within the organisation	Climate Change and Energy Management – Page 28 Performance Data – Page 63
302.2	Energy consumption outside of the organisation	Performance Data – Page 63
302.3	Energy intensity	Performance Data – Page 63
302.4	Reduction of energy consumption	Climate Change and Energy Management – Page 28 Performance Data – Page 63
<b>GRI 303: Water and Effluents 2018</b>		
3.3	Management of water and effluents	Water Management – Page 19
303.1	Interactions with water as a shared resource	Water Management – Page 21
303.2	Management of water discharge-related impacts	Water Management – Page 19 and 20
303.3	Water withdrawal	Performance Data – Page 64
303.4	Water discharge	Water Management – Page 21 Performance Data – Page 64
303.5	Water consumption	Performance Data – Page 64
<b>GRI 304: Biodiversity 2016</b>		
3.3	Management of biodiversity	Catchment Management and Rehabilitation – Page 31
304.1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Catchment Management and Rehabilitation – Page 31 and 32
304.2	Significant impacts of activities, products, and services on biodiversity	Catchment Management and Rehabilitation – Page 31, 32 and 34
304.3	Habitats protected or restored	Catchment Management and Rehabilitation – Page 34
304.4	IUCN Red List species and national conservation list species with habitats in areas affected by operation	Catchment Management and Rehabilitation – Page 31 and 32
<b>GRI 305: Emissions 2016</b>		
3.3	Management of emissions	Climate Change and Energy Management – Page 26
305.1	Direct (Scope 1) GHG emissions	Climate Change and Energy Management – Page 28 Performance Data – Page 63
305.2	Energy indirect (Scope 2) GHG emissions	Climate Change and Energy Management – Page 28 Performance Data – Page 63
305.3	Other indirect (Scope 2) GHG emissions	Performance Data – Page 63 Climate Change and Energy Management – Page 28
305.4	GHG emissions intensity	Performance Data – Page 63
305.5	Reduction of GHG emissions	Climate Change and Energy Management – Page 28 Performance Data – Page 63
<b>GRI 306: Waste 2020</b>		
3.3	Management of waste	Waste and Hazardous Materials – Page 23
306.1	Waste generation and significant waste-related impacts	Waste and Hazardous Materials – Page 23
306.3	Waste generated	Waste and Hazardous Materials – Page 25 Performance Data – Page 65
306.4	Waste diverted from disposal	Performance Data – Page 65
306.5	Waste directed to disposal	Performance Data – Page 65
<b>GRI 401: Employment 2016</b>		
401.1	New employee hires and employee turnover	Performance Data – Page 62
401.2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Labour Management and Employee Relations – Page 48
401.3	Parental leave	Labour Management and Employee Relations – Page 48

Disclosure Number	Disclosure Title	Location or Explanation
<b>GRI 402: Labour/Management Relations 2016</b>		
402.1	Minimum notice periods regarding operational changes	Labour Management and Employee Relations – Page 48
<b>GRI 403: Occupational Health and Safety 2018</b>		
3.3	Management of occupational health and safety	Health, Safety, and Radiation Management – Page 35
403.1	Occupational health and safety management system	Health, Safety, and Radiation Management – Page 35
403.2	Hazard identification, risk assessment, and incident investigation	Health, Safety, and Radiation Management – Page 36 and 37
403.3	Occupational health services	Health, Safety, and Radiation Management – Page 36
403.4	Worker participation, consultation, and communication on occupational health and safety	Health, Safety, and Radiation Management – Page 37
403.5	Worker training on occupational health and safety	Health, Safety, and Radiation Management – Page 38 and 40
403.6	Promotion of worker health	Health, Safety, and Radiation Management – Page 37
403.7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Health, Safety, and Radiation Management – Page 36 and 37
403.8	Workers covered by an occupational health and safety management system	Performance Data – Page 64
403.9	Work-related injuries	Health, Safety, and Radiation Management – Page 39
403.10	Work-related ill health	Health, Safety, and Radiation Management – Page 39
<b>GRI 404: Training and Education 2016</b>		
404.2	Programs for upgrading employee skills and transition assistance programs	Waste and Hazardous Materials – Page 24 and 25 Health, Safety, and Radiation Management – Page 36, 37, 38 and 40 Ethics, Human Rights, Anti-Bribery and Corruption – Page 56 and 57 Cybersecurity and Data Management – Page 60
<b>GRI 405: Diversity and Equal Opportunity 2016</b>		
3.3	Management of diversity and equal opportunity	Diversity and Equal Opportunity – Page 50
405.1	Diversity of governance bodies and employees	Diversity and Equal Opportunity – Page 51 and 62
405.2	Ratio of basic salary and remuneration of women to men	Diversity and Equal Opportunity – Page 51
<b>GRI 406: Non-discrimination 2016</b>		
3.3	Management of non-discrimination	Labour Management and Employee Relations – Page 48 Diversity and Equal Opportunity – Page 50 Ethics, Human Rights, Anti-Bribery and Corruption – Page 56
406.1	Incidents of discrimination and corrective actions taken	Performance Data – Page 64
<b>GRI 410: Security Practices 2016</b>		
3.3	Management of security practices	Ethics, Human Rights, Anti-Bribery and Corruption – Page 56
410.1	Security personnel trained in human rights policies or procedures	Ethics, Human Rights, Anti-Bribery and Corruption – Page 56 and 57 Performance Data – Page 62
<b>GRI 413: Local Communities 2016</b>		
3.3	Management of local communities	Community Relations and Engagement – Page 42
413.1	Operations with local community engagement, impact assessments, and development programs	Performance Data – Page 64
413.2	Operations with significant actual and potential negative impacts on local communities	Community Relations and Engagement – Page 43 and 44

# Acronyms

<b>AERA</b>	Atomic Energy Regulatory Authority
<b>ASRS</b>	Australian Sustainability Reporting Standards
<b>ASX</b>	Australian Securities Exchange
<b>BESS</b>	Battery energy storage system
<b>CDA</b>	Community Development Agreement
<b>C&amp;M</b>	Care and maintenance
<b>CO<sub>2</sub></b>	Carbon Dioxide
<b>DEA</b>	Department of Environmental Affairs (Botswana)
<b>DEC</b>	District Executive Committee (Malawi)
<b>DLI</b>	Derived limit of intake
<b>EAD</b>	Environmental Affairs Department (Malawi)
<b>EMP</b>	Environmental Management Plan
<b>ESCOM</b>	Electricity Supply Corporation of Malawi
<b>ESG</b>	Environmental, Social, Governance
<b>GBF</b>	Global Biodiversity Framework
<b>GHG</b>	Greenhouse gases
<b>GJ</b>	Gigajoules
<b>GMP</b>	Gender Management Plan
<b>GRI</b>	Global Reporting Initiative
<b>HRDC</b>	Human Resource Development Council (Botswana)
<b>HSMP</b>	Health and Safety Management Plan
<b>HVAS</b>	High Volume Air Samplers
<b>IAEA</b>	International Atomic Energy Agency
<b>ICRP</b>	International Commission for Radiation Protection
<b>IFRS</b>	International Financial Reporting Standards
<b>IPCC</b>	Intergovernmental Panel on Climate Change
<b>ISSB</b>	International Sustainability Standards Board
<b>IUCN</b>	International Union for Conservation of Nature
<b>JHA</b>	Job hazard analysis
<b>L</b>	Litres
<b>LLRD</b>	Long-lived radioactive dust
<b>LOTO</b>	Lock-Out-Tag-Out
<b>LTI</b>	Lost Time Injury
<b>MCP</b>	Mine closure plan
<b>MDA</b>	Mine Development Agreement
<b>MEITI</b>	Malawi Extractive Industries Transparency Initiative

<b>MEPA</b>	Malawi Environment Protection Authority
<b>MERA</b>	Malawi Energy Regulatory Authority
<b>MFA</b>	Multi-factor authentication
<b>Mlb</b>	Million pounds
<b>MRA</b>	Malawi Revenue Authority
<b>NO<sub>x</sub></b>	Nitrogen oxide
<b>NWRA</b>	National Water Resource Authority (Malawi)
<b>PPE</b>	Personal protective equipment
<b>RC</b>	Reverse circulation
<b>RPI</b>	Radiation Protection Inspectorate (Botswana)
<b>SDG</b>	Sustainable Development Goals
<b>SHER</b>	Safety, health, environment and radiation
<b>SHERMT</b>	Safety, health, environment, radiation and mining technical
<b>SHREC</b>	Safety, health, radiation, environment and community
<b>SO<sub>2</sub></b>	Sulphur dioxide
<b>SOP</b>	Standard Operational Procedures
<b>TCFD</b>	Task Force on Climate-related Financial Disclosures
<b>t CO<sub>2</sub> -e</b>	Tonnes of carbon dioxide equivalent
<b>TDS</b>	Total dissolved solids
<b>TPA</b>	Tonnes per annum
<b>TRIFR</b>	Total recordable injury frequency rate
<b>TSF</b>	Tailings storage facility
<b>TSS</b>	Total suspended solids
<b>UDHR</b>	Universal Declaration of Human Rights
<b>UN</b>	United Nations
<b>U<sub>3</sub>O<sub>8</sub></b>	Uranium oxide
<b>VDC</b>	Village Development Committee
<b>VPSHR</b>	Voluntary Principles on Security and Human Rights
<b>WAB</b>	Water Apportionment Board (Botswana)
<b>WHO</b>	World Health Organisation
<b>WRD</b>	Waste Rock Dump
<b>μJ/m<sup>3</sup></b>	Micro joules per cubic metre (measure for radon decay product concentration)



**LOTUS**  
RESOURCES

**Registered Office**

Level 20, 140 St Georges Terrace  
Perth, Western Australia, 6000

[lotusresources.com.au](http://lotusresources.com.au) | ASX:LOT