

La Compagnie Minière de Musonoïe Global SAS

RCCM. CD/KZI/RCCM/15 – B – 333 ID. NAT. 14-B0500-N72557G NIF : A0815341K
Site COMMUS : Localité PIERRE MUTEBA, Groupement KAZEMBE, Secteur de LUILU, Territoire
de MUTSHATSHA, Province du LUALABA, République Démocratique du CONGO

Clarification Statement by COMMUS SAS

Regarding Relevant Environmental Impact Reports

We appreciate the attention paid by Source International, AFREWATCH, RAID and other organizations to environmental issues in the mining sector of the Democratic Republic of the Congo (DRC), as well as the research and studies they have conducted on environmental topics associated with COMMUS' operations.

We take the environmental and community health concerns raised in the reports very seriously. Any issues relating to community health and environmental quality merit attention and scientific assessment. While we acknowledge that these studies offer valuable reference information for understanding regional environmental conditions, their conclusions must be comprehensively analyzed against long-term monitoring data, regional environmental baselines and systematic public health research. We hereby provide the following explanations concerning the content about COMMUS contained in the reports.

Environmental protection and community health and safety are core pillars of COMMUS' operational governance. The Company has established an environmental, occupational health and safety management system, and continuously carries out environmental monitoring, dust control, wastewater management, tailings facility administration, hazardous waste handling, emergency response to environmental incidents, and community engagement to mitigate the potential impacts of its operations on the environment and surrounding communities.

The Company holds ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management System certifications, and undergoes annual surveillance audits by third-party institutions. All relevant management practices comply with applicable laws and regulations of the DRC, and are continuously refined with reference to international good mining industry practices.

I. Explanation on Regional Air Quality Issues

The PM2.5, PM10 and other particulate matter concentration levels cited in the reports reflect long-standing air quality challenges in the Kolwezi area. As a key component of the Katanga Copper-Cobalt Belt, the local atmospheric environment is jointly affected by natural geological backgrounds, mining activities, urban development, as well as ongoing industrial and transportation operations. Therefore, understanding and assessing regional air quality requires comprehensive analysis incorporating long-term monitoring data and regional contextual factors.

Fully recognizing its environmental management responsibilities as a major industrial operator in the region, COMMUS has consistently implemented measures to reduce dust emissions from its

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operations. The Company conducts all production activities in strict compliance with applicable environmental laws, regulations and permits of the DRC, under the oversight and administration of competent regulatory authorities.

Systematic dust control measures have been deployed across potential dust-emitting sources including open-pit mine faces, waste rock stockpiles and haulage roads: daily cyclic water sprinkling for dust suppression at open-pit working areas; slope stabilization, vegetation restoration and periodic sprinkling for waste rock piles; refined blasting management including optimized blasting windows, low-dust blasting technologies, controlled blast intensity, and immediate post-blasting water sprinkling. Such technical and engineering management measures continuously cut down dust emission intensity.

Independent third-party environmental monitoring commissioned by the Company shows that air quality at monitoring points surrounding the mine generally meets applicable standards. Meanwhile, the Company recognizes the importance of monitoring at community-sensitive locations, and will further expand its monitoring network based on on-site conditions to strengthen its capacity to understand and evaluate surrounding environmental conditions moving forward.

Regarding the environmental impacts cited in the reports affecting Galaxy School and adjacent communities, the Company attaches high priority to the health and well-being of local residents. It has installed additional noise barriers around the school and intensified water sprinkling on adjacent haulage roads for dust reduction, while continuously evaluating the effectiveness of these interventions.

Furthermore, the Company will maintain communication with school administrations, community representatives and other relevant stakeholders through its existing community engagement channels to promptly address legitimate concerns, and optimize environmental management and protection measures in light of practical conditions.

II. Explanation on Heavy Metal Enrichment Issues

The reports reference elevated concentrations of copper, cobalt, manganese and other heavy metals in inhalable particulate matter, soil and other environmental media. The Kolwezi-located Katanga Copper-Cobalt Belt ranks among the world's most significant copper and cobalt resource-rich zones, with naturally elevated baseline levels of metallic elements in local soils, bedrock and portions of groundwater that differ markedly from other regions. Concentrations of metallic elements in environmental media are shaped by a combination of geological background and historical mining activities. Scientific identification of pollution sources requires multi-faceted evidence including regional environmental baseline data, pollutant migration pathways, long-term monitoring results and source apportionment studies for comprehensive evaluation.

As an operating enterprise in the region, COMMUS persists in implementing measures to reduce potential environmental impacts stemming from mining activities. Solid materials generated by

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mining operations, including waste rock, low-grade ore and tailings, are all stored in compliant waste rock piles and tailings facilities constructed in accordance with local regulatory requirements. Full-spectrum engineering and management controls are implemented, including anti-seepage, anti-runoff and dust suppression measures, slope stabilization and vegetation restoration, to minimize potential environmental impacts during material stockpiling and transportation.

COMMUS acknowledges that community residents' concerns over potential exposure risks to heavy metals are valid regardless of the source of such metals. Moving forward, the Company will further track the distribution of metallic elements across air, soil, water and other environmental media through follow-up environmental monitoring work.

III. Explanation on Regional Water Environment Issues

The heavy metal contamination observed in rivers, lakes and sediment across Kolwezi cited in the reports is similarly driven by multiple factors including natural geological background, urban domestic and industrial discharges and other anthropogenic activities. Analysis and assessment of regional water environment issues therefore demand comprehensive judgement based on long-term monitoring data and regional contextual factors, while systematic improvement can only be achieved through cross-industry and cross-regional collaborative governance.

COMMUS has always upheld its environmental governance obligations and exercised stringent control over wastewater discharges from its operations. Fully integrated treatment systems for production wastewater and domestic sewage have been constructed, implementing separate collection, treatment and monitoring for both streams prior to discharge once effluent meets permit standards. At present, the Company only conducts permitted discharge into the Musonoi River; internal and third-party testing consistently confirms that its discharged effluent complies with applicable permit requirements.

In parallel, the Company places high importance on safe drinking water access for surrounding community residents. As a long-standing mining development zone, Kolwezi faces practical challenges in secure drinking water access and water supply infrastructure due to geological conditions, historical industrial activities, urban expansion and population influx. While rigorously controlling its own production wastewater discharges and sustaining environmental monitoring, the Company prioritizes community water supply security as a key social investment focus, supporting the construction of water supply infrastructure to improve safe drinking water access for nearby communities.

In recent years, the Company has partnered with local water authorities to boost the hourly water supply capacity to 800 cubic meters, serving approximately 200,000 residents in downtown Kolwezi. It also undertakes the long-term operation, maintenance and power supply support for relevant facilities. The Company has invested in constructing 17 solar-powered water supply wells,

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which have been handed over to eight surrounding communities for operation. Meanwhile, it has supported the construction of auxiliary infrastructure including pumping stations and water supply pipelines, continuously improving the regional water supply capacity.

Going forward, the Company will continue collaborating with government regulatory authorities, professional institutions and community representatives. While maintaining compliant environmental management and regular monitoring, it will further refine water supply support initiatives to advance drinking water conditions in the region, and actively participate in science-based collaborative governance of the regional water environment.

IV. Comprehensive Assessment

We recognize that the referenced research delivers valuable reference information for understanding regional environmental conditions and helps mobilize broader societal attention to environmental protection and public health.

At the same time, we hold that scientific evaluation of environmental quality and potential health impacts must be grounded in long-term, systematic and multi-dimensional evidence, with full consideration of compound influences from natural regional geological baselines, historical mining activities and other environmental factors.

Existing publicly available data draws from monitoring conducted over limited timeframes and sampling points. Further analysis of the relative impacts of diverse environmental factors on community health necessitates cross-referencing with long-term environmental monitoring records, environmental baselines, pollution source apportionment and health risk assessments, among other lines of evidence.

Irrespective of the root causes of regional environmental issues, COMMUS fully appreciates local residents' legitimate concerns over environmental quality and health safety. The Company will continue implementing proactive measures to steadily mitigate potential environmental impacts from its operations and elevate its environmental management standards.

We believe such environmental and public health concerns warrant sustained attention, and support the conduct of broader, longer-term and systematic research under the guidance of government regulatory authorities and professional institutions to deepen scientific understanding of regional environmental conditions and latent health risks.

V. Action Plan

In response to the concerns and recommendations raised in the aforementioned reports, the Company will conduct ongoing evaluations and adopt reasonable measures to further enhance

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transparency in its environmental management practices.

First, the Company plans to engage qualified independent third-party institutions to carry out monitoring across rainy and dry seasons at the locations referenced in the reports, and utilize test results to further assess regional environmental conditions and potential risks.

Second, the Company will continuously optimize its environmental management system, strengthen oversight of priority areas including dust abatement, wastewater treatment, groundwater monitoring and solid waste disposal, and reduce operational environmental footprints through technological upgrades and continuous improvement.

Third, the Company will deepen communication with surrounding communities, local government authorities, environmental organizations, research and public health institutions, establish a social supervision mechanism, proactively accept oversight and recommendations from all societal stakeholders, and continuously boost transparency and public participation in environmental management work.

Fourth, the Company stands ready to actively participate in cross-regional collaborative environmental governance initiatives, partnering with government agencies, industry peers and professional institutions to advance research on regional environmental issues, build regional environmental monitoring capacity and drive ecological improvement. It will support science-informed environmental management and decision-making to advance mutually beneficial outcomes balancing regional economic development, environmental protection and local community wellbeing.

In closing, we reiterate our gratitude to the organizations and all members of society for their attention to and oversight of regional environmental issues. Upholding an open, transparent and responsible stance, the Company will earnestly solicit feedback from all parties, continuously improve its environmental management practices, and work alongside government bodies, communities and other stakeholders to deliver sustained improvements to regional environmental quality.

