CornishMetals

South crofty ltd.

CORNISH METALS INC.

For the avoidance of doubt
this Policy applies to South Crofty Ltd., an indirect subsidiary of Cornish Metals Inc.

SUSTAINABILITY AND ESG (ENVIRONMENTAL, SOCIAL AND GOVERNANCE) POLICY

1. Purpose of this Policy

Cornish Metals Inc. and its subsidiaries (the "**Group**") recognise that the long-term sustainability of our business, and our ability to enhance shareholder value, are dependent upon the integration of good environmental, social and governance (ESG) practice with effective management of the business. For the Group, operating sustainably encompasses our efforts to act with integrity across the business, assess and manage risk, minimise our environmental and social impacts and identify opportunities to make a positive contribution to the local environment, communities, and economy. The purpose of this Sustainability and ESG Policy (the "**Policy**") is to convey our commitment to conducting business in a sustainable manner.

This Policy sets out our ambition through a set of guiding principles which align with our Group Vision, Mission and Values which can be found on our website.

2. Who does this Policy apply to?

This Policy applies to all directors, officers and employees of the Group ("**Personnel**"). Policy awareness training forms part of the induction process for new Personnel and all existing Personnel receive training on how to comply with this Policy. We require our Personnel at all levels to follow environmental, social and governance procedures appropriate to their function, and we encourage our Personnel to participate proactively in our sustainability programme.

This Policy is available to all interested parties through the Company's website. We will inform consultants, contractors and other business partners about this Policy and share our expectations that they will observe and uphold our position on sustainability whilst on our premises and exploration drilling sites and when performing work on our behalf.

3. Responsibility for this Policy

While the Board of directors has overall responsibility for this Policy, the Chief Development Officer (CDO) is responsible for the implementation and monitoring of the Policy and reporting on its implementation to the Board Sustainability Committee. Furthermore, all Personnel are responsible and accountable in their role to ensure that the aims of this Policy are met and have an obligation to bring any identified issues forward to management for resolution.

4. Policy commitment

The Group's management team is committed to the development, implementation, maintenance and continual improvement of its sustainability programme, under the leadership of the Board Sustainability Committee and underpinned by the principles set out in this Policy. We believe it is the responsibility of management to set the expectations and ensure that material sustainability considerations form an integral part of our planning and decision-making. We are committed to establishing and maintaining management systems aligned with the international standard ISO 14001 Environmental Management, to help us

effectively integrate sustainability considerations into our business, and to ensuring that resources are available to enable us to meet our regulatory and voluntary obligations and current industry practice.

5. Guiding principles

We have defined the following guiding principles to underpin our developing strategic framework and systems for the integration of ESG into our business activities:

(a) Environmental

(i) Comply with applicable environmental laws, regulations and permits in all jurisdictions where the Group operates.
(ii) Incorporate controls into project design and operations as required to avoid, minimise and mitigate adverse impacts on water, land, air and biodiversity.
(iii) Monitor and evaluate our environmental performance, establish key performance indicators (KPIs) and implement programmes for improvement.
(iv) Minimise our project carbon footprint where economically and technologically feasible and work towards developing our project greenhouse gas inventory for public disclosure.
(v) Incorporate efficient use of natural resources and other inputs into project design and operations.
(vi) Responsibly manage our wastes in accordance with the waste hierarchy.
(vii) Work towards future public disclosure of our performance on material environmental matters.

(b) Social

(i) Provide a safe and healthy working environment for our employees, consultants, contractors and visitors, in accordance with our Health and Safety Policy.
(ii) Provide a supportive workplace environment, with training and development opportunities that enable us to attract, retain and engage our workforce.
(iii) Provide a workplace free from discrimination in accordance with our Diversity, Equality and Inclusion Policy.
(iv) Implement effective grievance mechanisms for use by our Personnel, local communities and our wider stakeholder network.
(v) Engage meaningfully and regularly with the local community and our wider stakeholder network and work towards establishing methods to measure the effectiveness of our engagement.
(vi) Incorporate controls into project design and operations as required to avoid, minimise and mitigate disturbance to local communities and items of cultural heritage.
(vii) Seek opportunities to make a positive contribution to the local economy though local hiring and local procurement where possible and supporting local initiatives and charities.
(viii) Work towards future public disclosure of our performance on material social matters.

(c) Governance

(i) Maintain a Board Sustainability Committee to provide oversight and leadership in the direction of our sustainability programme and increase awareness and competency for integration of material sustainability considerations into business decisions and daily activities.
(ii) Comply with applicable laws, regulations and permits in all jurisdictions where the Group operates.
(iii) Comply with applicable regulations associated with our UK AIM and Canadian TSX-V stock exchange listings.
(iv) Deliver returns to our investors, founded on a responsible approach to conducting business.

(v) Assess and manage risks within the business in accordance with our Risk Management Policy.
(vi) Respect human rights by fulfilling the commitments to our Personnel, consultants, contractors, other business partners and local communities conveyed in our Group policies and expecting our business partners to work towards being able to demonstrate their own responsible business practices.
(vii) Develop systems, procedures and training to support implementation of all our Group policies, with evaluation to confirm their effectiveness and inform continuous improvement.
(viii) Review all Group policies as the Group's activities mature and in line with changing legislation and current industry practice.
(ix) Develop and implement a sustainability strategy and a climate strategy, applicable to the project stage, for a systematic approach to managing our material sustainability impacts, risks and opportunities.
(x) Work towards public disclosure of the Group's sustainability approach and material issues performance, to a recognised industry standard.

6. Review

This Policy will be updated over time to maintain alignment with the Group's evolving sustainability programme. As such, the Board shall review this Policy annually, at a minimum, and make changes as required.

First approved by the Board of Directors of Cornish Metals Inc. on 13 December 2023.

Reviewed and approved by the Board of Directors of Cornish Metals Inc. on 12 March 2025.