

Climate Change Policy Statement

We understand the importance of addressing climate change and are committed to support the global effort to curb greenhouse gas (GHG) emissions. To that end, we continuously look at our business practices to ensure we operate responsibly and transparently in alignment with our climate change commitments. Our commitments herein support our ambition to systematically achieve net zero GHG emissions while effectively managing our exposure to climate-related risks and opportunities. Our climate commitments align with our sustainability approach grounded in our vision to build a carefully managed metal commons that will be used, recovered, and reused for generations to come.

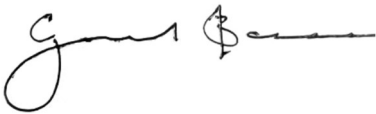
Addressing climate change is part of the reason why we plan to collect polymetallic nodules from the seafloor of abyssal plains in the Clarion-Clipperton Zone (CCZ). Population growth, rising living standards, and adoption of renewable energy and electric vehicles are driving an exponential growth in demand for critical minerals. We see polymetallic nodules as a complementary, lower-ESG-impact solution to supply critical minerals needed for the energy transition and development. By providing an alternative supply of nickel, copper cobalt and manganese derived from a resource located far offshore in one of the lowest biomass and carbon storage ecosystems on the planet, we aim to help relieve some of the pressure on essential climate-regulating ecosystems from where some of these critical metals are mined today, including Indonesian rainforests that produce nickel and DRC woodlands that produce cobalt.

OUR APPROACH

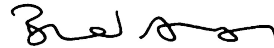
We are currently in the pre-commercial phase of our development and focused on identifying ways to minimize the carbon footprint of our future commercial activities, before they start. Our future operations include the use of offshore marine vessels to collect and transport nodules and onshore metallurgical processing of nodules to supply energy transition metals. These technologies all produce hard-to-abate emissions from fossil fuels; hence our focus is on identifying alternative technologies and feedstocks as well as non-conventional carbon mitigation projects such as carbon sinks conservation. We acknowledge the fundamental importance of the Paris Agreement's objective to limit global warming to 1.5 degree Celsius and intend to support it by decarbonizing our future operations. We consider it our responsibility to (1) account for the full stack of impacts we may have on planetary boundaries and social foundations, (2) aim to create a net positive impact on people and the planet, and (3) change course if the path we choose does not deliver on our net positive impact goal.

OUR COMMITMENTS

1. Understand the **lifecycle emissions associated with our operations** and continuously look for ways to minimize them.
2. Implement TCFD recommendations including the evaluation and integration of **climate-related risks and opportunities** in our business strategy.
3. Build our decarbonization plan to systematically implement our **path toward net-zero emissions**.
4. **Work with our value chain** to identify opportunities to mitigate our carbon footprint and drive circularity of critical metals.
5. Supply **low carbon metals and intermediates** to support downstream users' decarbonization efforts.
6. Invest in projects that **protect carbon sinks and biodiversity**.
7. In our engagements with governments and other stakeholders, **voice our support for accelerated climate action** and the protection of carbon sinks.
8. **Report transparently on our performance and progress** to manage climate-related risks and opportunities.



Gerard Barron
Chairman and Chief Executive Officer



Brendan May
Sustainability and Innovation Committee Chair

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