

ENVIRONMENTAL POLICY

Concord Strategic Group LLC

Reference: CSG_ENV_001 | Public Edition v1.0 | April 2026

PUBLIC | DECLARED COMPANY POLICY

This policy establishes the environmental responsibility commitment for Concord Strategic Group LLC and the expectations CSG applies to suppliers in its mineral supply chain. The policy is aligned to ISO 14001 principles and to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

1 Environmental Commitment

1.1 Concord Strategic Group LLC (CSG) is committed to conducting its business in an environmentally responsible manner. As an intermediary in mineral and commodity supply chains, CSG recognises its responsibility to engage only with suppliers who demonstrate credible environmental practices, and to apply environmental risk assessment as an integral component of all sourcing and procurement decisions.

1.2 CSG does not operate mines, smelters, or refineries. CSG's environmental influence is exercised through the supplier engagement and onboarding standards set out in this policy and in CSG_POL_001 (Supply Chain Due Diligence Policy).

2 Environmental Objectives

Objective	Indicator	Target
Responsible mineral sourcing	% suppliers with verified environmental licences at onboarding	100% prior to first transaction
Supply chain environmental transparency	% active suppliers with current environmental compliance declarations	100% of Tier 1 and Tier 2 suppliers
Environmental risk assessment	Environmental risk score recorded per supplier onboarding	All onboarding files include the assessment
Annual environmental risk review	Origin and supplier environmental risks documented annually	Annual review completed within Q1
Continuous improvement	Identified environmental issues with corrective action plans	Plans agreed within 30 days of identification

3 Supplier Environmental Expectations

Requirement	Threshold	Evidence required
Environmental permits and	Required	Current operating licences from the relevant

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licences		authority, verified at onboarding and annually.
Environmental Impact Assessment (EIA)	Required	EIA report or formal regulatory exemption documentation, verified at onboarding.
Waste management documentation	Recommended	Waste management plan or disposal records, reviewed annually.
Third-party environmental certification	Recommended	ISO 14001 or equivalent, where available, verified at onboarding.
Community impact documentation	Noted	Community engagement records where available, reviewed annually.

4 Environmental Disqualifying Conditions

CSG will not engage with suppliers in any of the following circumstances. Confirmation of any of these triggers immediate suspension pending review and termination on confirmation.

- 4.1 Suppliers subject to active environmental enforcement action by a competent regulatory authority.
- 4.2 Suppliers operating without the environmental licences required in the producing jurisdiction.
- 4.3 Suppliers credibly identified as causing severe and unmitigated environmental harm, including riverine tailings discharge, unauthorised deforestation, or destruction of recognised conservation areas.
- 4.4 Suppliers operating in jurisdictions or sites where mining is prohibited under national law or under recognised international conventions to which the host state is party.

5 CSG's Environmental Due Diligence Approach

- 5.1 Environmental due diligence is integrated into the CSG Supplier Due Diligence Questionnaire (CSG_GEL_DDQ_001). No supplier enters CSG's active supply chain without completion of the environmental section of the questionnaire.
- 5.2 Where CSG personnel conduct site visits to supplier operations, environmental conditions are observed and findings are documented.
- 5.3 Environmental risks identified through supplier engagement are reported to the Managing Director and addressed under the risk response framework in CSG_POL_001.

6 Continuous Improvement

- 6.1 CSG reviews environmental performance across the supplier base annually and monitors regulatory developments in producing and transit jurisdictions.
- 6.2 CSG is in the process of developing the management systems and documentation required to support ISO 14001 certification at the appropriate stage of business maturity.
- 6.3 Environmental performance is included as a section of the Annual Public Due Diligence Report (CSG_CMP_003).



7 Document Control

7.1 This policy is reviewed annually by the Compliance Officer and approved by the Managing Director. Material changes to applicable law, ISO 14001 expectations, or CSG's supplier base trigger an out-of-cycle review.

7.2 All versions are retained in CSG's compliance records under CSG_QMS_002.

Approved by the Managing Director of Concord Strategic Group LLC and adopted as the active environmental policy of the company on the effective date stated above.