



LUCARA
DIAMOND

RESPONSIBLE MINING POLICY

The mission of Lucara Diamond Corp. and Lucara Botswana (Pty) Ltd. is to responsibly mine rough diamonds safely and profitably while creating meaningful value for our stakeholders. Our approach to responsible mining integrates environment, social and governance considerations into all aspects of our business. With one of our core goals being continual improvement, we are committed to the following principles:

Environmental Responsibility

We are committed to sustainable development. As part of this commitment we endeavor to minimize the short and long term adverse impacts.

- We promote environmental education, awareness and stewardship throughout the mining life cycle, emphasizing the conservation of land, air, water, biodiversity and energy resources.
- We assess the risks and impacts of our activities and integrate these considerations into our planning, operating and business decisions.
- We proactively plan for mine closure based on science, environmental protection and long-term community interests.
- We recognize that climate change has serious implications to our environment, people, communities and business. We are committed to reducing our carbon footprint, including promoting energy efficiency programs and reducing our GHG emissions.

Social Responsibility

We will initiate and promote on-going dialogue with a broad range of stakeholders across our operations, maintained in a spirit of transparency and good faith. Lucara recognizes that effective stakeholder engagement can create value and mitigate risk for both the Company and our stakeholders.

- We are resolute in our effort to achieve Zero Harm and put the health and safety of our employees and contractors first and foremost in everything we do.
- We engage with our host communities to build trust-based relationships.
- We encourage local hire and procurement, and work with our stakeholders to advance socioeconomic development in the regions where we operate.
- We expect our employees, suppliers, customers, contractors and business partners to adhere to the principles of this policy when operating on our sites or on our behalf.
- We are accountable for meeting legal requirements and our commitments to stakeholders.

Governance

We believe in conducting our business in a transparent manner that complies with applicable laws, respects human rights and safeguards our employees, contractors, communities and stakeholders.

- We conduct our business in line with the United Nations Guiding Principles on Business and Human Rights.



- We are open to public scrutiny and conduct our business ethically. We empower our people to uphold our corporate values.
- We foster an inclusive and diverse workplace that does not tolerate harassment or discrimination of any kind.
- We respect the rights, interests and traditions of Indigenous peoples where we operate.
- We monitor, measure and publicly report our performance against internationally recognized reporting standards.
- We implement management systems, processes and training programs that support our commitment to responsible mining.

Planning for a Positive Legacy

We believe that engagement with stakeholders throughout the mine life cycle is critical for ensuring that our operations deliver positive economic and social benefits, while minimizing environmental impacts.

- We are signatories to the United Nations Global Compact and actively contribute to the Sustainable Development Goals applicable to us.
- We focus our investments on community-driven sustainable initiatives that address the needs of the communities.
- We strive for mining industry best practices in the design, safe operation and monitoring of facilities for managing water, tailings and other mineral wastes, as those practices are applicable to our operations.
- We review and update our Closure Plan on a regular basis.

Approved by the Board of Directors on February 23, 2020, and amended on March 19, 2021.