

RESPONSIBLE MINING POLICY

The mission of Lucara Diamond Corp. (“Lucara” or the “Company”) and its subsidiaries 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 some of our core values being the pursuit of excellence, working collaboratively, and being transparent and trustworthy, we are committed to the following principles:

Environmental Responsibility

Lucara is committed to promoting sustainable practices and as part of this commitment, we endeavour to minimize the short- and long-term adverse impacts of our mining operations.

- 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 scientific research, environmental protection, and the long-term interests of the communities impacted by our operations.
- We recognize that climate change has serious implications to our environment, people, communities, and operations. We are committed to reducing our carbon footprint, including by promoting energy efficiency programs and reducing our greenhouse gas (“GHG”) emissions.

Social Responsibility

The Company continues to foster 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, contractors and visitors first and foremost in everything we do.
- We engage with our host communities to build trust-based relationships and foster mutual benefits.
- We encourage local hire and procurement, and work with our stakeholders to advance socio-economic 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 committed to accountability in meeting all applicable legal requirements and fulfilling 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 remote area dwellers 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

Lucara believes 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 where we live and work.
- 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 mine closure plan on a regular basis.

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