



INVOLUNTARY RESETTLEMENT POLICY

Version:	01	Effective date:	1 February 2022
Applicable to:	All employees	Control (C):	yes
Approved by:	Board of Directors	Date of approval:	28 January 2022



Introduction and Purpose

Elementum Energy Group (“**Elementum**” or “**Company**” or “**we**”) commits to powering a transition to a carbon-free society with affordable, reliable, sustainable and modern energy. We also commit to ensuring that our environmental, societal, economic and governance decisions benefit future generations.

Our project lifecycle includes environmental, social and economic analyses before construction to mitigate the adverse impact of land acquisition or restrictions on use and access. We aim to avoid or at least minimise involuntary resettlement wherever feasible via alternative project designs.

This involuntary resettlement policy (the “**Policy**”) covers physical and economic displacement, which can be full, partial, permanent or temporary, resulting from our project-related activities. The Policy also demonstrates our commitment to displaced persons with no recognisable legal right or claim to the land they occupy.

Scope

This Policy applies to all Elementum employees, regardless of their department and the position they hold.

Where Elementum participates in existing joint ventures as a non-controlling shareholder, Elementum will make the other shareholder(s) specifically aware of the significance of this Policy to Elementum and encourage such shareholder(s) to implement this Policy or one of a similar standard.

For new minority joint venture cooperation under consideration, Elementum will strive to commit the other shareholder(s) to adopt this Policy or one of a similar standard.

Policy Statements

We will identify, discuss and choose options to avoid and mitigate physical and economic displacement.

Our approach is consistent with local laws and regulations and respectful of customary title and use of the land and related assets to ensure full and informed participation of the affected persons.

Stakeholder engagement processes will be established in collaboration with affected communities and households to align decision-making processes, options and alternatives related to the resettlement/restoration of livelihoods.

Where displacement cannot be avoided, we will aim to support the rights of communities by incorporating displacement plans: Resettlement Action Plan for physical displacement and Livelihood Restoration Action Plan for economic displacement.

Our plans address the participation of individuals and communities in displacement decisions, risk management considerations, adequate compensation, and rehabilitation assistance.

This Policy meets the requirements of:

- IFC Performance Standards (2012), namely PS 5 Land Acquisition and Involuntary Resettlement (2012);
- The International Bill of Human Rights and IFC Sustainability Framework (2011);
- EBRD Environmental and Social Policy (2019);
- EBRD Resettlement Guidance and Good Practice;
- Guiding Principles on Internal Displacement (1998);



- Universal Declaration of Human Rights (1948);
- National legislation requirements; and
- UN Sustainable Development Targets.

Members of Elementum Energy Group include:

Elementum Energy Limited;and
Subsidiaries of Elementum Energy Limited.

Body/Function/Individuals	Roles and Responsibilities
Board of Directors	Approves the Policy.
Chief Operating Officer	Policy Owner: owns, endorses and ensures the implementation of the Policy. Advises on policy content, and ensures relevant and correct communication of policy efforts to internal and external stakeholders.
Management, employees and contract workers of Elementum	Responsible for adhering to this Policy. Comply with the letter and spirit of the Policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the Policy.

Deviations

No exemptions from this Policy can be granted unless there are exceptional circumstances or the Policy is obviously not applicable. All requests for exemptions must be made in writing to the Policy owner. The Policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.

Policy Revision

This Policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It may be amended at any time with the approval of the Board of Directors. In the event of any discrepancies between the English version of this policy and a translated version, the English version will prevail.

Contact

For more information, please contact the Chief Operating Officer.