# INDIGENOUS PEOPLES, REHABILITATION AND RESETTLEMENT POLICY

## OF

# LLOYDS METALS AND ENERGY LIMITED

**(CIN: L40300MH1977PLC019594)**

**Registered Office:** Plot No. A 1-2, MIDC Area, Ghugus, Chandrapur, Maharashtra - 442505

**Tel. Nos.:** 07172 285103 / 285398

**Corporate Office:** A-2, 2nd Floor, Madhu Estate, Pandurang Budhkar Marg, Lower Parel, Mumbai 400013

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The Policy shall be maintained through the following revision and approval record:

Date of Approval

03-11-2026

The Policy shall be approved by the Board of Directors and shall be reviewed periodically to ensure its continued relevance and effectiveness.

## 1. Purpose

Lloyds Metals and Energy Limited ("the Company" / "LMEL") is committed to conducting its business in a responsible, fair, transparent and respectful manner. The purpose of this Indigenous Peoples, Rehabilitation and Resettlement Policy ("Policy") is to establish principles and procedures to identify, prevent, minimize, mitigate and address adverse impacts on communities, including Indigenous Peoples, local communities, project affected persons and other stakeholders, arising from land acquisition, project development, mining, operational activities, closure and related business activities.

This Policy aims to ensure that engagement with affected communities is undertaken in good faith, that displacement is avoided or minimized wherever feasible, that rehabilitation and resettlement are carried out in accordance with applicable laws and approved plans, and that the rights, culture, livelihoods and dignity of Indigenous Peoples and affected communities are respected.

## 2. Scope and Applicability

This Policy is applicable to the Company, all its locations and all activities undertaken for and / or by the Company directly or indirectly, including mines, plants, project sites, offices, logistics facilities and other locations under the Company's operational control.

This Policy shall apply, where applicable, to all employees, directors, senior managers, officers, workers, consultants, contractors, suppliers, service providers, agents, business partners, subsidiaries, joint ventures and any other persons or entities acting for or on behalf of the Company.

This Policy is applicable to situations involving land acquisition, physical displacement, economic displacement, livelihood impacts, access restrictions, relocation, rehabilitation, resettlement, Indigenous Peoples' engagement, cultural heritage and community-related impacts associated with Company operations or projects.

## 3. General Principles

### 3.1 Legal Compliance

The Company shall comply with all applicable laws, rules, regulations, permits, approvals and statutory requirements relating to land acquisition, rehabilitation, resettlement, Indigenous Peoples, forest rights, tribal rights, cultural heritage, community consultation and environmental and social management.

### 3.2 Avoidance and Minimization of Displacement

The Company shall strive to avoid physical and economic displacement wherever feasible. Where displacement cannot be avoided, the Company shall seek to minimize adverse impacts through appropriate planning, consultation, compensation, rehabilitation and livelihood restoration measures.

### 3.3 Respect for Indigenous Peoples

The Company shall respect the rights, culture, values, language, customs, traditions and knowledge of Indigenous Peoples and shall engage with them in a culturally appropriate, inclusive and transparent manner.

### 3.4 Stakeholder Identification and Engagement

The Company shall identify affected communities, vulnerable groups, Indigenous Peoples, local authorities and other relevant stakeholders and shall undertake engagement in a timely, informed and accessible manner.

### 3.5 Free, Prior and Informed Consent

Where projects or activities may impact Indigenous Peoples, the Company shall strive to engage in good faith consultation and seek Free, Prior and Informed Consent, wherever required under applicable law, approvals or recognized standards.

### 3.6 Fair Compensation and Entitlements

The Company shall ensure that compensation, entitlements and support measures are provided in accordance with applicable laws, approved plans and regulatory requirements. Compensation and support shall be communicated transparently to eligible affected persons.

### 3.7 Livelihood Restoration

The Company shall strive to restore or improve livelihoods of economically displaced persons through appropriate measures such as livelihood support, skill development, income restoration, access to resources, employment linkages, enterprise support or other applicable initiatives.

### 3.8 Cultural Heritage Protection

The Company shall identify, respect and protect cultural heritage, including tangible and intangible heritage, and shall engage with relevant communities and authorities where project activities may affect cultural resources.

### 3.9 Vulnerable Groups

The Company shall pay particular attention to vulnerable groups, including women, children, elderly persons, persons with disabilities, Indigenous Peoples, marginalized groups and households with limited livelihood alternatives, wherever applicable.

### 4.10 Grievance Redressal

The Company shall provide appropriate channels for affected persons and communities to raise concerns or grievances and shall address such grievances in a fair, timely, transparent and culturally appropriate manner.

### 4.11 Monitoring, Review and Corrective Action

The Company shall monitor implementation of rehabilitation, resettlement, livelihood restoration and Indigenous Peoples engagement measures and shall take corrective actions, wherever required.

## 5. Land Acquisition, Rehabilitation and Resettlement

Where land acquisition, physical displacement or economic displacement is involved, the Company shall strive to undertake the following actions, as applicable:

- Identify affected persons, households, communities and livelihood users through appropriate surveys, consultations, baseline studies or records.
- Avoid or minimize land acquisition and displacement through project planning and alternative analysis, wherever feasible.
- Provide early and accessible information on project impacts, eligibility, entitlements, compensation and resettlement measures.
- Prepare and implement a Resettlement Action Plan and/or Livelihood Restoration Plan where required by applicable laws, approvals, lenders or internal procedures.
- Ensure that compensation, rehabilitation and resettlement support are undertaken in accordance with applicable laws and approved plans.
- Monitor livelihood restoration and resettlement outcomes and take corrective action where required.
- Maintain appropriate records of consultations, entitlements, compensation, grievances, actions taken and closure of commitments.

## 6. Indigenous Peoples Engagement and Protection

Where Indigenous Peoples or tribal communities are present in or around areas affected by the Company's operations or projects, the Company shall strive to undertake the following measures, as applicable:

- Identify Indigenous Peoples and understand the local context, customary practices, community structures, language, culture and traditional relationship with land and natural resources.
- Engage with Indigenous Peoples in good faith, in a culturally appropriate and inclusive manner, and provide information in a form and language that is reasonably understandable to them.

- Seek Free, Prior and Informed Consent where required under applicable law, approvals or recognized standards.
- Respect cultural heritage, sacred sites, traditional knowledge and community practices.
- Avoid or minimize impacts on Indigenous Peoples' livelihoods, natural resources, cultural heritage and community institutions.
- Develop engagement, mitigation, livelihood, cultural heritage protection and grievance measures in consultation with affected Indigenous Peoples, wherever applicable.
- Maintain records of consultation, consent processes, commitments, grievances and implementation progress.

## 7. Community Consultation Framework

The Company shall strive to follow a structured community consultation framework for projects and operations that may affect local communities, Indigenous Peoples or project affected persons. Such framework may include:

- Identification of affected communities and relevant stakeholders.
- Preparation of stakeholder engagement plans, where required.
- Timely sharing of project-related information, potential impacts, entitlements and mitigation measures.
- Providing opportunities for affected stakeholders to express their views, concerns and expectations.
- Consideration of stakeholder inputs in project planning and implementation, wherever feasible.
- Disclosure of grievance channels and reporting of material engagement outcomes, as applicable.

## 8. Responsibilities

### 8.1 Board of Directors / Executive Management

The Board of Directors / Executive Management shall have oversight of this Policy and may review significant matters relating to Indigenous Peoples, rehabilitation, resettlement and community impacts, as considered necessary.

### 8.2 Functional and Site Management

Respective business heads, project heads, mine heads, plant heads, site heads and designated functions shall be responsible for implementation of this Policy within their areas of responsibility.

### 8.3 Designated Function / Officer

The Company may designate appropriate personnel or function(s) to coordinate stakeholder engagement, rehabilitation and resettlement implementation, Indigenous Peoples engagement, grievance management, monitoring and reporting under this Policy.

### 8.4 Employees and Business Partners

Employees, contractors, consultants, suppliers, agents and other business partners acting for or on behalf of the Company shall be expected to support implementation of this Policy and comply with applicable community, land, human rights and cultural heritage requirements.

## 9. Grievance Mechanism

The Company shall provide appropriate grievance channels for affected communities, Indigenous Peoples, project affected persons, employees, contractors and other stakeholders to raise concerns relating to land acquisition, displacement, livelihood restoration, compensation, cultural heritage, Indigenous Peoples engagement, community impacts or implementation of this Policy.

Grievances shall be recorded, reviewed and addressed in a fair and timely manner. The Company shall maintain confidentiality where requested and feasible, and shall not tolerate retaliation against persons raising concerns in good faith.

## 10. Monitoring, Reporting and Documentation

The Company shall monitor implementation of material commitments under this Policy, including stakeholder engagement, land acquisition, rehabilitation, resettlement, livelihood restoration, Indigenous Peoples engagement, cultural heritage protection, grievances and corrective actions.

The Company shall maintain appropriate documentation and records relating to baseline assessments, consultations, FPIC processes where applicable, entitlements, compensation, livelihood restoration, grievance records, monitoring reports, audit / assessment findings and corrective actions.

The Company shall report material matters relating to this Policy to relevant management authorities and through applicable external disclosures, where required under applicable laws, regulations or reporting frameworks.

## 11. Training and Awareness

The Company shall conduct awareness and training programmes, as appropriate, for employees, contractors and relevant functions involved in land acquisition, community engagement, Indigenous Peoples engagement, rehabilitation, resettlement, livelihood restoration and grievance management.

## 12. Review of Policy

This Policy shall be reviewed periodically, or earlier where required, due to changes in applicable laws, regulatory requirements, business operations, stakeholder expectations or risks related to Indigenous Peoples, rehabilitation and resettlement.