

Stakeholder Engagement Plan

Version 1.0

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Introduction

This document is the Stakeholder Engagement Plan (“**SEP**”) that describes the planned stakeholder engagement process for the Zinnwald Lithium Project (the “**Project**”). It sets out a systematic approach to help Zinnwald Lithium GmbH (“**ZLG**”) build and maintain a constructive relationship with the Project's stakeholders, including locally affected communities. The document also includes a grievance mechanism through which stakeholders can raise any complaints.

The SEP will be updated throughout the project preparation (pre-construction phase), construction, operational and closure phases to ensure that it continues to include the most appropriate engagement plan. This first edition sets out the detailed plan for the remainder of the pre-construction phase, which is expected to last until the end of 2027. The SEP will be updated for the proposed plan for the construction and operational production phases of the Project.

The SEP is to support the early participation of stakeholders and will be disclosed publicly on a voluntary basis.

Summary Project Description

Group Structure

ZLG is the owner of all mining and exploration licenses in Germany and will be the Company that applies for all permits and ultimately construct and operate the Project. ZLG is ultimately 100% owned by Zinnwald Lithium Plc (“**ZLP**”), which is a UK listed public company. ZLP has a diverse shareholder register with a current overall ownership of more than 90% by UK and EU based shareholders.

Project Summary

The Project is located in Saxony, Germany in the municipality of Altenberg close to the German / Czech border, circa 50 km south of Dresden. The Project is designed as a fully integrated mining and chemical processing operation to ultimately produce a battery grade Lithium Hydroxide product (“**LHM**”) that will be used in the German / EU battery chain.

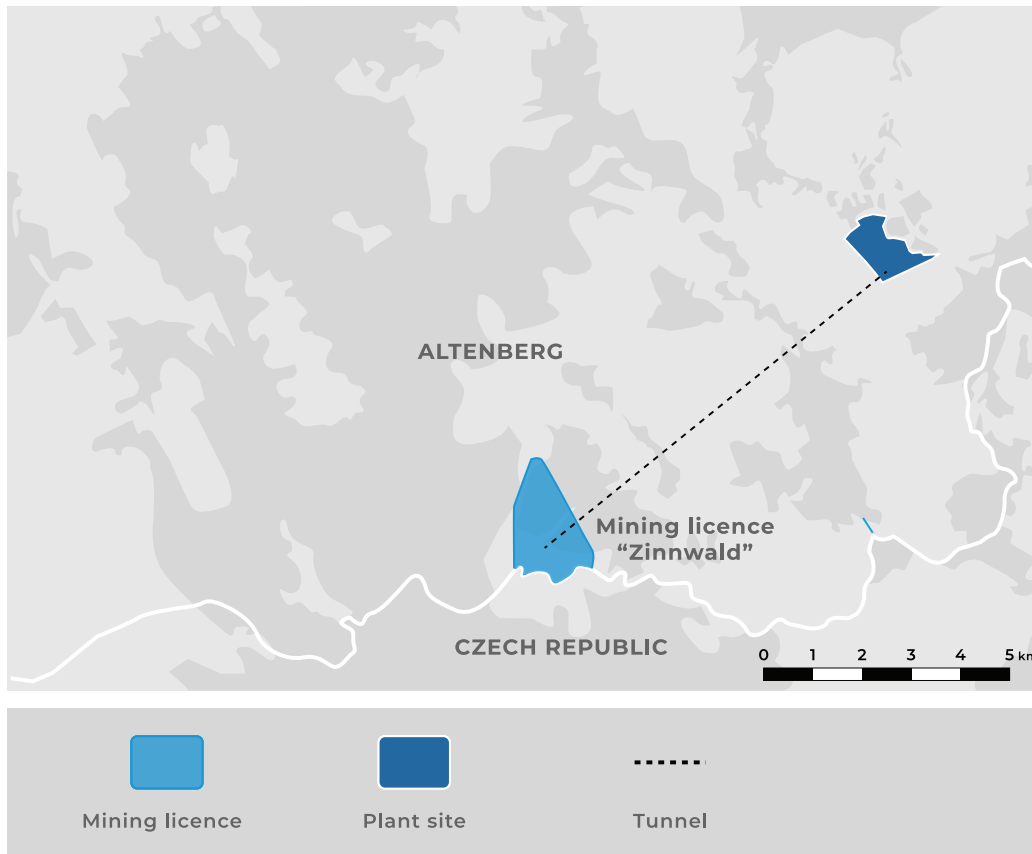
There are three main components to the Project, as shown in Figure 1 below.

- Underground mine at Zinnwald, which will include an access decline from the ore body to the former border station near Altenberg.
- Access and ore haulage tunnel to link the mine to the processing site near Liebenau.
- Processing site near Liebenau that will include the production plant and a tailings storage facility (“**TSF**”).

The planned underground mine has been designed as a conventional longhole open stoping operation with paste backfill, utilising regional pillars to mitigate surface subsidence risks. Primary crushing will occur underground before ore is transported through the 9.1 km tunnel via conveyor to the industrial facility. At the industrial facility ore is initially processed using conventional high intensity wet magnetic separation to recover a zinnwaldite concentrate. The quartz sand produced during this phase is partly returned to the mine to be used as backfill material to close the resulting cavities, while the remaining amount is stored in the adjacent tailings storage facility or sold to third parties for use, for example, in the construction industry.

Subsequent processing stages include calcination of the zinnwaldite concentrate in a rotary kiln, pressure leaching and bicarbonation utilising a proprietary process developed by Metso and subsequent evaporation and crystallisation. The primary end product will be battery grade lithium hydroxide which will be shipped via the nearby autobahn to end-users in the German or EU battery chain. A number of by-products including analcime, calcium silicate, calcium fluoride, calcium carbonate and potassium chloride will also be produced. The processing plant is designed so that liquids and gases are run in a closed circuit and to achieve zero liquid discharge.

Figure 1: Overview of Project Area, Local Communities and Components



Impact on Local Communities

The Project has been designed so as to minimise the impact on local communities, the environment and protected areas in the vicinity (Natura 200 and World Heritage). This has been done despite a generally higher cost. This includes underground mining and continuous backfilling with mined waste, rather than open-pit mining.; ore haulage via a tunnel to be constructed, rather than via truck transport on local roads or overland conveyor; and the selection of an area of ground adjacent to the A17 Highway as the main industrial site. This site is not in a protected area (such as Natura 2000) and is also not directly visible from the nearest village, Liebenau. The site is also well located with access to the A17 Highway and is near a planned solar park with the potential to supply a significant portion of the Project's electrical power needs from a renewable source.

The Project falls entirely within the municipality of Altenberg that covers an area of 145.8 km² and had a total population of 7,851 as of 2023. The largest towns and villages most potentially impacted will be Zinnwald (2023 population of 377), Altenberg (population 1,968) and Liebenau (population 389). The proposed process plant site is located to the north of the village of Liebenau, where the

terrain rises gradually to the south and creates a natural barrier between the village and the plant site. The total above ground area required for the Project is 121 Hectares (Ha), comprising 6 Ha at the Zinnwald border station and 115 Ha near Liebenau.

Permitting / ESIA

The Project will be permitted under German Mining Law (BBergG) and will follow an integrated permitting procedure under one unitary body, the Saxony Mining Ministry (“SOBA”). A Spatial Planning Procedure is underway being a pre-requirement to the overarching permit, the General Operating Plan (“GOP”). As part of the GOP process, the Project must complete an Environmental Impact Assessment (“EIA”). The GOP requires a number of supporting documents including the EIA and other related documentation (e.g. Natura 2000 Appropriate Assessments, Landscape Management Plan and various environmental technical reports).

The Project has also commenced its work to produce an Environmental and Social Impact Assessment (“ESIA”) that will meet both the requirements for permitting under German Federal law as well as being completed to a level suitable for the purposes of seeking finance from International Finance Institutions, who are signatories to the Equator Principles 4 (and related standards) and therefore covers a much broader scope than what is legally necessary for the permitting process under the BBergG.

Land Acquisition

The Project will require the acquisition of land for the above ground facilities, including at the former border station for the mine access facilities and for the processing plant site near Liebenau. The Project believes that the displacement of households from their dwellings/homes will not be required (i.e. no physical displacement). The Company is seeking to acquire the land required by the Project on a voluntary basis through reaching appropriate agreements with landowners and land users. Use of compulsory expropriation powers will only be requested as a last resort. ZLG has developed a formal Land Access Acquisition and Compensation Framework (“LAACF”) to guide this process.

High-Level Project Schedule

The status of the Project and planned schedule is summarised below, which is dependent on permitting approvals and financing:

- Feasibility study and engineering design: the Preliminary Feasibility Study (“PFS”) was published at the end of Q1 2025 with the Definitive Feasibility Study (“DFS”) scheduled to be completed during 2026 when the Front-End Engineering Design (“FEED”) will commence.
- ESIA: The ESIA Scoping process commenced at the end of 2024 and the ESIA Scoping Report is scheduled to be disclosed for public consultation in Q4 2025. The ESIA development is planned to commence during Q1 2026 for a 12–18-month period.
- Permitting: The spatial planning procedure is scheduled to complete end-2025. The technical studies for the GOP, including the work for the EIA, are scheduled to commence during 2025, with the completion of the GOP and other relevant permits in 2027 prior to construction.
- Land: Some land will need to be purchased for the Project and the land acquisition process is scheduled to commence during 2026 and continue through 2027.
- Construction and operation: Construction is scheduled to commence following the completion of required permitting in 2027 with an approximate 2-year construction period. The start of production is planned for 2030.

Further information

For further detail on the Project and its planned operations, please see:

- Executive Summary of the Project's Pre-Feasibility Study (March 2025)
- Scoping Study report for the Project's ESIA

Stakeholder Engagement Regulatory Framework

Stakeholder engagement for the Project will follow German and EU legislative requirements and the standards of the International Finance Institutions, including the European Bank for Reconstruction and Development ("EBRD") Environmental and Social ("E&S") Requirements, European Investment Bank ("EIB") E&S Standards, Equator Principles 4 ("EP4"), International Finance Corporation ("IFC") Performance Standards and related guidance. These are summarised below:

National Regulatory Framework

Table 1 shows the main German, EU and international conventions that contain requirements related to stakeholder engagement relevant to the Project:

Table 1: Main Legal Framework related to Stakeholder Engagement

National legislation	EU legislation / International conventions
Environmental Impact Assessment Act (Gesetz über die Umweltverträglichkeitsprüfung UVPG)	Public Participation Directive (2003/35/EC)
Federal Mining Act (Bundesberggesetz: BBergG)	Access to Environmental Information Directive (2003/4/EC)
Spatial Planning Act (Raumordnungsgesetz ROG)	Aarhus Convention
Public Participation Act (in accordance with EC Directive 2003/35/EC)	Espoo Convention on Environmental Impact Assessment in a Transboundary Context
Administrative Procedure Act (Verwaltungsverfahrensgesetz: VwVfG)	

Requirements for public participation, including stakeholder engagement and information disclosure, during the preparation of a project in Germany are mainly associated with the approval and authorisation procedures. Key procedures of relevance for the Project are the spatial planning procedure, GOP procedure, EIA and the land acquisition process. The key national legislation matters and a summary of associated stakeholder engagement requirements for the Project are summarised in Table 2.

Table 2: Key Legal Framework and Stakeholder Engagement Requirements

Key Legal Framework	Summary of stakeholder engagement requirements
Spatial Planning Act (Raumordnungsgesetz, ROG)	As part of the spatial impact assessment, measures for informing and consulting the public are carried out by the relevant authority. Procedures for informing and involving the public throughout the entire process are contained in the relevant legislation for spatial planning (ROG) and administrative procedures (VwVfG).
Administrative Procedure Act (Verwaltungsverfahrensgesetz, VwVfG)	

Key Legal Framework	Summary of stakeholder engagement requirements
Environmental Impact Assessment Act (Gesetz über die Umweltverträglichkeitsprüfung, UVPG)	The UVPG includes provisions for stakeholder engagement, including: After the developer's completion of an EIA, the competent authority (in the Project's case this is SOBA) is expected to inform other authorities of their environmental responsibilities relative to the Project – this includes any municipalities or administrative districts affected by the Project, as well as other relevant regional authorities. Notified authorities are invited to provide their opinions on the Project and EIA. Public information disclosure and public participation are expected. The EIA report and any other related reports must be made available for public review. In summary, the procedures stipulated by UVPG include: • The public is informed via suitable media about where the draft document will be published, including where the printed and online version is available for inspection, when and where it can be inspected. • The public is invited to submit comments and/or participate in public hearings. A period of 30 days is provided for public comments. Public hearings are held at a suitable location (e.g. the town hall) and the document is presented. • The public must be informed about the level of participation / consultation as well as its right to a say (so-called participation promise) before the participation / consultation process has been started. The official guidelines of the German Council for Public Relations (GDPR) on citizen participation and communication must be observed. • The comments received from all parties involved are processed and the document is revised accordingly. A report on which comments have been accepted and which have not will be sent to the competent authorities together with a justification and the updated draft of the document, who will assess whether the comments have been meaningfully taken into account. Furthermore, the results of this report will be published, e.g. via media, website and other channels.
Federal Mining Act (Bundesberggesetz: BBergG) (GOP procedure including EIA according to §50ff)	The legislation sets out the requirements for the authorisation, operation and closure of a mine, including the carrying out of an EIA for projects that are likely to have a significant impact on the environment before a permit is issued for the implementation of the project. The BBergG sets out the rules and detailed procedures for involving the public in the decision-making process. Consultation with the public and other stakeholders during the GOP procedure is an essential feature of national assessment procedures. The Bundesberggesetz governs the acquisition and expropriation of land for mining projects in the Public Interest and the provision of compensation for affected property. Under the national legal framework affected landowners and users with legal rights must be consulted.
Public Participation Act (in accordance with EC Directive 2003/35/EC)	The law regulates public participation in the preparation of certain environment-related plans and programmes. The purpose is to give interested members of the public the opportunity to participate in authorisation procedures for environmentally relevant projects by inspecting the planning documents and comments. In addition to those affected and interested citizens, the public also includes environmental and nature conservation associations. These organisations bring environmental and nature conservation concerns into the planning process.
Espoo Convention on Environmental Impact Assessment in a Transboundary Context	The Espoo Convention ensures public participation by requiring: • Notification of the affected public • Access to EIA documents • Opportunities to comment • Consideration of those comments in the decision-making process

Key Legal Framework	Summary of stakeholder engagement requirements
	This public involvement helps improve the quality and legitimacy of environmental decisions and ensures that cross-border environmental concerns are properly addressed.

International Financing Standards & Guidelines

The stakeholder engagement requirements and guidance for ESIA within the international financing standards require additional rigour and a wider scope than the national requirements. Whilst the national legal framework requires public participation, including stakeholder engagement and information disclosure, there are some gaps with the requirements contained in the international financing standards (i.e. EBRD Environmental & Social Requirements¹, IFC Performance Standards², and EP4³). The key gaps are related to identification of stakeholders, requirement for a SEP, information disclosure, grievance mechanism and meaningful consultation comprising a two-way process. Where there are gaps, the Project will seek to meet the more stringent requirement.

The EBRD E&S Policy (EBRD ESP) contains 10 E&S Requirements (“ESRs”) for management of project-related E&S risks and impacts, including ESR10 on Stakeholder Engagement and ESR5 on land acquisition, restrictions on land use and involuntary resettlement. The land acquisition process will be carried out in accordance with national legislation for projects in the public interest and ESR 5.

EBRD ESR 10 requires that stakeholder engagement is an ongoing process throughout the project planning and life which involves:

- Stakeholder identification and analysis
- Stakeholder engagement planning and the preparation of a SEP
- Disclosure of information
- Meaningful consultation and participation
- Grievance mechanism
- Conducting stakeholder engagement in a manner that protects the privacy and safety of stakeholders and is free from retaliation
- Ongoing reporting to stakeholders

The EBRD ESRs (2024) are the most recently published standards. This SEP has been developed in line with the requirements of ESR10 and related guidance. This has considered the categorisation of the Project as a Category A under the EBRD ESP (2024) , IFC Performance Standards and EP4 requiring a formalised and participatory ESIA process.

Corporate Policies

ZLP has long-standing corporate responsibility policies for all group companies that pertain to aspects of social performance. These are publicly available on ZLP’s website (<https://zinnwaldlithium.com/investors/corporate-governance/>).

¹ <https://www.ebrd.com/environmental-and-social-policy-esp-2024>

² <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

³ <https://equator-principles.com/resources/> Principle 5 relates to Stakeholder Engagement requirements with Principle 6 containing the requirement for a Grievance Mechanism

Summary of Previous Stakeholder Engagement

Meaningful engagement and information disclosure with the stakeholders and local communities in and around the Project has always been a high priority to the Company. The Company recognises that the Project will result in environmental and social impacts on the local community and other stakeholders and that concerns have already been raised by local community groups regarding potential impacts. It is therefore important to involve and consider the needs of stakeholders at an early stage to ensure the Company can address community concerns that have already been raised and maintain a social license to operate. A summary of key interactions and stakeholder engagement activities to date from 2023 is provided below:

Table 3: Summary of Previous Engagement

Stakeholder	Summary of Previous Engagement Activities
Local Communities – including Zinnwald, Altenberg, Liebenau	2023: Information event at Zinnwald town hall that outlined the drilling campaign and future development plans. Dedicated community relations campaign for drilling including regular meetings with community representatives. 2024: - ZLG established its headquarters at Altenberg, which also provides a place to hold meetings with community and provide more details on the Project in an information centre setup specifically for this purpose. - An open day in June was held at the facility attended by more than 300 people from the area. The Project concept and its various components were explained and described in an interactive forum. SOBA as the permitting authority was invited and informed stakeholders about the legal requirements and proceedings of the permitting process. - Active ongoing engagement with Mayor of Altenberg whose jurisdiction covers all the communities potentially impacted by the Project i.e. Zinnwald, Liebenau and Altenberg. - ZLG held information events with citizens of Bärenstein and Liebenau and also started discussions with the local farming co-operative (“Agrar Genossenschaft Liebenau eG”) in the area regarding the possible impact of the Project utilising areas currently farmed. - Meetings with the citizens’ initiatives of Zinnwald, Bärenstein and Liebenau, in which concerns were raised. - Ongoing meetings with local business owners and other interest groups to discuss the impact of the Project on the region and local businesses. - Ongoing engagement with pupils and students from the local schools, universities and labour education facilities 2025: Public information meeting on the PFS results and general project updates
Local administrative units	2024: Meeting and project presentation with mayors of administrative district of Saxon Switzerland-Eastern Ore Mountains 2024: Project overview for elected new city council of Altenberg
Free State of Saxony	- Sächsische Staatskanzlei 2024: Sächsischer Landtag (parliament of the Free State of Saxony): informing of MPs about the project, its status, plans and challenges 2025: Sächsisches Staatsministerium für Wirtschaft, Arbeit und Verkehr (SMWA): informing Minister Dirk Panter about the project, its status, plans and challenges
Federal Government	2024: Project presentation to and discussion with Chancellor Scholz during his visit at SOBA - Letter with “Nine steps for successful German lithium production by 2030” to federal government and BMWK
Media	- Regular updates to local media (press releases, press appointments and briefings) - Professional management of national and international media inquiries

In summary, stakeholder concerns to-date include:

Table 4: Summary of Stakeholder Concerns To-date

Stakeholder Group	Concerns
Citizens of Zinnwald	• Protection of local groundwater and surface water resources • Protection of nature conservation resources, protected landscape and cultural heritage resources • Protection of the status of 'state-recognised resort' (Zinnwald) • Risks from underground mining on overlying properties, houses and land • Concerns about more traffic • Concerns about the loss of property value • Few tangible benefits for local communities from the Project • Social impacts on local communities, including on community health, safety and security • Loss of attractiveness and revenues from tourism
Citizens of Bärenstein	• Protection of local groundwater and surface water resources • Protection of nature conservation resources, protected landscape and cultural heritage resources • Concerns about chemical accidents • Concerns about more traffic • Concerns about the loss of property value • Concerns of sustainability for local businesses mainly related to agriculture • Few tangible benefits for local communities from the Project • Social impacts on local communities, including on community health, safety and security • Loss of attractiveness and revenues from tourism
Citizens of Liebenau	• Protection of local groundwater and surface water resources • Protection of nature conservation resources, protected landscape and cultural heritage resources • Concerns about chemical accidents • Concerns about more traffic • Concerns about the loss of property value • Concerns of sustainability for local businesses mainly related to agriculture • Few tangible benefits for local communities from the Project • Concerns about emissions of dust, noise, light and pollution • Social impacts on local communities, including on community health, safety and security
Businessowners	• Increasing competition for well-trained labour • Increasing competition for housing of employees • Concerns about infrastructure constraints
Regional educational institutions, school pupils and students	• Opportunities for future careers and jobs • Opportunities for practical teaching
Local politicians	• Concerns about the impact of the project on the population, nature and other economic sectors such as tourism • Opportunities for tax revenue • Opportunities for economic development in the region

Project Stakeholders & Communications Methods

Stakeholder Identification and Analysis

To ensure a structured and effective engagement process, stakeholders were identified and analysed using a systematic methodology. The identification process consisted of a combination of brainstorming sessions, stakeholder mapping and consultation with key internal and external experts. This approach ensured that all relevant stakeholders were considered, from those with a high level of personal involvement to those with little personal interest.

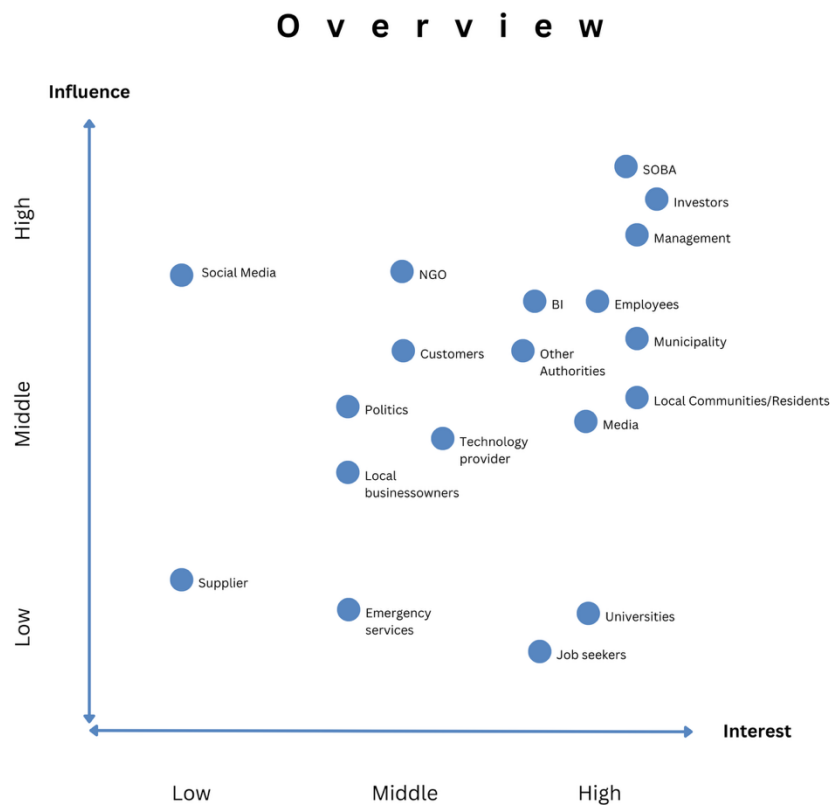
The stakeholder identification process considers foreseeable risks of retaliation against stakeholders. If any such risk is identified, the Project will implement policies prohibiting any form of retaliation within the Project's control and develop effective measures to respond to retaliation risks and impacts.

Once identified, stakeholders are categorised according to their level of interest and concern. This categorisation helps to tailor engagement strategies to the needs and expectations of each group. Stakeholders who are likely to be affected by the environmental and social impacts of the Project or may have an interest in the Project have been identified. The analysis of stakeholders has been used to plan the best way and communication methods to engage with them.

In the analysis phase, the potential influence of stakeholders was assessed, as well as stakeholder attitudes, concerns and potential impact on the success of the Project. This was through interviews, surveys and records of previous interactions. This comprehensive assessment enables the development of targeted communication and engagement strategies that ensure proactive management of stakeholder expectations, mitigate risks and exploit opportunities for collaboration.

The identification of the stakeholders is presented in a Stakeholder Analysis Map, summarised in Figure 2.

Figure 2: High-level Stakeholder Analysis Map



It is important to emphasise that the stakeholder identification and analysis is an ongoing process and can never be finalised. Affected parties and interests change throughout the entire Project, meaning that the stakeholder analysis and interaction is constantly being adapted.

The stakeholders identified to date and their role related to the Project is summarised in Table 5.

Table 5: Stakeholders

Stakeholder	Role of the stakeholder and objective of the selected engagement
Local communities: Households and communities: Community representatives, residents, businesses and users of land and leisure facilities in the cities and towns within the Project's sphere of influence: - City of Altenberg - City of Glashütte - City of Bad Gottleuba-Berggießhübel - City of Liebstadt - Zinnwald, - Liebenau, - Breitenau, - Walddörfchen municipality (including all districts and municipalities, etc.)	Role: directly / indirectly affected Local residents play a decisive role, as the Project is to be realised with their acceptance. Consideration of their feedback and views in Project decision making is a priority. Consistently transparent communication on an equal footing enables a mutual exchange and the ZLG's ability to respond to requests.

Stakeholder	Role of the stakeholder and objective of the selected engagement
Landowners & Land users: - Owners and users of properties to be acquired for the Project	Role: Owners and users of Project required land A close exchange between ZLG and landowners and land users of properties potentially to be acquired by ZLG enables transparent insight into developments in the Project and an early exchange so that mutual interests can be taken into account in finding solutions with regard to the use of the sites.
Czech communities: Households and communities: Community representatives, residents, businesses in the cities and towns within the Project's sphere of influence: - Cinovec	Role: directly / indirectly affected Consideration of the views of affected communities is part of Project approvals and decision making.
Vulnerable groups and/or individuals e.g. - Disabled persons - Elderly persons - Refugees - Asylum seekers - Migrants	Role: directly / indirectly affected It is important for ZLG to ensure that voices of often less noticed groups or individuals are heard. The Project is guided in all stakeholder engagement activities by the GDPR Guidelines on Citizen Participation and Communication. The Project recognises that vulnerable groups and/or individuals require special consideration in the consultation process, as they may be unable to fully participate in mainstream consultation activities and may also be disproportionately affected by some impacts. Accordingly, the Company ensures that people can participate in the formats described regardless of their gender and sexual identity, age and degree of disability.
Employees	Role: Employee The dissemination of up-to-date information to all employees enables them to participate and plan their own lives better, as their professional activities are directly linked to the progress of the lithium mining project. A consistently intact employee grievance procedure forms the foundation of social sustainability and healthy working conditions within ZLG. The company must ensure that its employees do not suffer any social or societal disadvantages, discrimination or even health threats or risks as a result of their employment relationship.
Political institutions & administration: - District Administrator Saxon Switzerland-Eastern Ore Mountains (Landkreis SOE) - Acting Mayors in the region - City and local councils of the city of Altenberg and Bad Gottleuba-Berggießhübel and Glashütte - Altenberg Municipality	Role: Political decision-makers Through a direct exchange, the political representatives of the localities directly incorporate the opinions of the citizens. Another channel of communication to political decision-makers is created. Through regular dialogue, economic and political interests are also taken into account and directly incorporated into further project planning. In addition, the procedure is given increased legitimisation through approval at a political level.
Municipal, regional, national authorities:	Role: Authoriser

Stakeholder	Role of the stakeholder and objective of the selected engagement
- Saxon Mining Authority (SOBA) - State Directorate of Saxony and others (Landesdirektion Sachsen) - District Administrator Saxon Switzerland-Eastern Ore Mountains (Landkreis SOE) - permitting process related authorities	Fast and transparent communication ensures no delays in the approval process and better planning.
National / Local Interest groups and NGOs: - Local communities - Actors in the pre-political sphere, such as local clubs, associations, initiatives, etc. including: - NABU e.V. - Grüne Liga Osterzgebirge e.V. - Heimatverein e. V. Liebenau - Knappenverein Altenberg e. V. - Sächsischer Sportverein Altenberg e.V.	Role: Entities that collectively represent groups of people with common interests Specific, detailed answers that go into the requested topics in detail serve to provide information and create a basis for getting involved. Passing on information to the interest groups enables concerns to be raised and existing expertise to be contributed. It also provides an intermediary through which interested groups can be informed in confidence.
Public companies / institutions: - National, municipal and local organisations, such as emergency services, fire brigades, healthcare providers, owners and operators of utilities (energy, water, waste), police, etc. - FFW Altenberg and fire brigades of municipalities - Deutsches Rotes Kreuz (German Red Cross) - SachsenEnergie AG - Stadtverwaltung Altenberg (Abwasser)	Role: Service provider for infrastructure and supply Publicly funded parties that own land or other assets in the country that could be affected by the Project, e.g. for the operation of infrastructure such as the national electricity grid and for the operation of public services such as health and emergency services. These activities could affect or be affected by the Project activities, including the project that relies on the services provided by these organisations.
Private companies / institutions: - National, municipal and local businesses	Role: Service provider for infrastructure and supply Private owned companies that could be affected by the project, e.g. through direct and indirect influences on regional economic development, the provision of labour or the awarding of contracts. These activities could affect or be affected by the Project activities, including the project that relies on the services provided by these organisations.
Media: - National and local news agencies, newspapers, broadcasting companies - Digital media, such as blogs and podcasts	Role: Partner for media dissemination of information about the project Professional media relations are characterised by high quality, intensive relationship management with media representatives and regular communication. The continuous provision of information about the project ensures a constant flow of information across various media channels. Specific, detailed responses that address the topics requested in detail serve to inform and create a basis for engagement.
Investors / Financial institutions:	Role: Project financier and funder

Stakeholder	Role of the stakeholder and objective of the selected engagement
- Investors directly involved in the company - Banks and other financing providers	Open communication with investors and financial institutions is a prerequisite for long-term cooperation and support. The influence of investors makes it all the more relevant to maintain a close dialogue about decision-making and change processes.
Customers: - Potential buyers of core product - Potential buyers of residues	Role: End customer Open communication with customers, both current and potential, is essential for long-term cooperation and economic success. Given the influence of customers on project profitability, close communication about requirements and needs is absolutely essential.
National governments: - Federal Chancellor in office - State government of the Free State of Saxony - Federal ministries (e.g. BMWK etc.) - Specialised ministries of the Free State of Saxony (e.g. SMWA and others) - Representatives of the monument protection authorities - Representatives of the Saxon Ministry of Interior (SMI)	Role: Political decision-makers on national level The German Federal Government and the Government of the Free State of Saxony are involved in granting permits and in monitoring and enforcing compliance with national legislation and plans at all stages of the project. The national governments will also serve as a source of information for the implementation of studies such as the ESIA.
International governments: - EU Commission - Directorates, i.e. Directorate-General for Competition, Directorate-General for Energy, Directorate-General for Environment)	Role: Political decision-makers on international level The European Commission influences the project by setting the political and legislative framework at the European level, and by monitoring compliance with it. The European Commission and the relevant directorates will also serve as a source of information for conducting studies such as the ESIA.
International interest groups and NGOs: - International Actors in the pre-political sphere, such as local clubs, associations, initiatives, etc. including: - World Wide Fund For Nature (WWF) - BirdLife International - European Environmental Bureau - Client Earth - Greenpeace	Role: Entities that collectively represent groups of people with common interests Specific, detailed answers that go into the requested topics in detail serve to provide information and create a basis for getting involved. Passing on information to the interest groups enables concerns to be raised and existing expertise to be contributed. It also provides an intermediary through which interested citizens can be informed in confidence.
Partner / service provider / supplier: - Technology partners (e.g. Metso, K-Utec, Snowden Optiro, etc.)	Role: Technology partner and service provider for design, installation and operation A close exchange between the technology partners enables realistic prospects for orders and collaboration to be communicated. A close and honest exchange is essential for planning security, especially with regard to larger orders. Companies in the region in particular are both potential cooperation partners and competitors in terms of labour. Good cooperation strengthens synergies and minimises mutual resentment.
Educational and research institutions: - Universities (e.g. Bergakademie Freiberg)	Role: Cooperating partners in the academic field Close cooperation between science and industry ensures continuous knowledge transfer and enables the implementation of the latest

Stakeholder	Role of the stakeholder and objective of the selected engagement
- Associations (e.g. Fraunhofer Gesellschaft, Lithium Institute)	scientific findings and technologies. Research contracts allow university institutions and research partners to support the project and be directly involved in its further development.

If you are a stakeholder who has not been identified in the table above but would like to be included in the stakeholder engagement for the Project, please contact us using the Contact Details provided at the end of this SEP.

Communications Methods

A variety of communication methods with stakeholders are used by ZLG:

- **Official Correspondence & Meetings** – Formal letters, emails, and direct meetings with government agencies, regulatory bodies, and key stakeholders.
- **Public Information Events** – Town hall meetings and open days at the ZLG Altenberg office to share project updates and engage with local communities and other stakeholders.
- **Community Website & Stakeholder Feedback Channel** - A dedicated community website (<https://lithium-im-erzgebirge.de/>) has been established to provide Project updates, Frequently Asked Questions (FAQs), and disclose downloadable project documents. A dedicated channel on the website is provided to capture and respond to stakeholder feedback.
- **Neighbourhood Magazine** - A regularly published printed magazine informs local communities about key aspects of the project.
- **Local Media Outreach** – Press releases, newspaper advertisements, leaflets, and posters to inform local communities and stakeholders.
- **Information Disclosure** – Key Project documents, such as the ESIA Scoping Report, ESIA, SEP, and LAACF, are published online and available at ZLG offices and other public locations.
- **Direct Landowner & Land User Engagement** – Personal meetings, focus groups, and regular updates provide detailed information on the land acquisition process and compensation framework.
- **Tailored Communication for Vulnerable Groups** – Home visits (where required), accessible materials in simplified language, and assistance for event participation to support inclusivity for elderly, disabled, and less digitally connected individuals.
- **Grievance Mechanism** – A structured grievance process allows stakeholders to submit complaints via in-person visits, email, phone, postal mail, or the online community website.

This multi-channel communication strategy ensures clear, transparent, and inclusive engagement throughout the project lifecycle while capturing and addressing stakeholder feedback effectively.

Stakeholder Engagement Programme & Information Disclosure

Engagement at Each Stage of the Project Lifecycle

ZLG will continue to engage and seek stakeholder inputs throughout the development stages of the Project's lifecycle from its current planning stage through pre-construction, construction, operation, decommissioning and ultimately, closure.

The main communication channels for ZLG and its stakeholders are well established and will continue to be used moving forward.

Project Documentation Disclosure (ESIA & SEP) & Consultation Activities

ZLG intends to disclose all relevant information and documents to the public such as:

- Land Access, Acquisition & Compensation Framework
- Stakeholder Engagement Plan
- ESIA Scoping Report
- ESIA and Non-Technical Summary

These documents will be available in both German and English. Summaries of certain relevant key information (e.g. related to trans-boundary impacts) will be also made available in Czech.

Stakeholders will be able to access these documents on the ZLG Community website (www.lithium-im-erzgebirge.de). In addition, hard copies will be available in the following locations:

- ZLG Offices in Altenberg and Dresden
- Altenberg Town Hall
- Bad Gottleuba-Berggießhübel Town Hall
- Glashütte Town Hall

Announcements to inform the public and stakeholders on the time, date and location of public meetings will be made using local media (i.e. Sächsische Zeitung, Altenberger Bote, Glashütter Amtsblatt, Gottleubaer Lokalanzeiger) and on the ZLG Community website.

Consultation & Disclosure of SEP

The initial SEP will be publicly accessible (e.g. on the website) for 4 weeks for comments. In addition, a printed version will be made available in the public places noted above. The publication will be announced in a press release and by e-mail to all identified stakeholders. As part of the publication, explicit reference will be made to any previously unidentified stakeholders who wish to participate and be included, that they can and should contact ZLG accordingly. As part of this communication, it will be emphasised that feedback on the SEP is explicitly desired. The contact addresses are presented in an easy-to-find manner as well as the grievance mechanism as an instrument for the personalised and anonymised submission of suggestions for change.

Post-ESIA Engagement

ZLG will proceed with engagement as laid out in this SEP. The implementation of the SEP throughout pre-construction, construction, operation, decommissioning and ultimately closure, will be overseen and managed by ZLG Social Performance personnel.

The SEP will be updated at a minimum annually to ensure it reflects the Project status and engagement plans. The ZLG Social Performance personnel will be responsible for review and updates to the SEP, mainly to ensure that:

- Stakeholder groups, lists, and mapping remain accurate.
- Engagement methods and approaches for information disclosure continue to meet stakeholder needs.
- Stakeholder participation is reviewed periodically and, if necessary, the frequency, means and format of engagement is revised to meet accessibility and participation requirements of all stakeholders.
- Periodic consultations with local affected people and communities are undertaken to ensure that E&S risks and impacts are properly assessed, managed and mitigated.

Stakeholder Engagement Action Plan

The Table below outlines the action plan for stakeholder engagement during the Project preparation phase (pre-construction). This will be updated as the Project develops to include a plan during construction and operation. All activities for the Project preparation phase are the responsibility of ZLG unless otherwise stated. Contractors will be required to following the commitments and principles contained within this SEP.

All stakeholder engagement activities are documented including:

- Stakeholder engagement log/register containing details on information presented, meetings held, feedback and questions received and Project response, including any commitments made to stakeholders. Comments and questions received will be reviewed and the stakeholder informed of the outcome.
- Meeting minutes/notes of meetings.
- Stakeholder list (will be kept updated).
- Grievance register (see next Section).

Table 6: Stakeholder Engagement Action Plan – Project Preparation Phase (Pre-Construction)

Key Project Activity	Target Stakeholder Group(s) ⁴	Stakeholder Engagement Actions & Methods	Schedule or Frequency of SE Action
Exploration Tunnel	Local households & directly and indirectly affected communities (including vulnerable groups). Political institutions & administration. Local interested groups.	Information & public meetings on the exploration tunnel application. Subsequent meetings and additional information based on feedback. Publications in local media (e.g. local advertising papers), press releases and media relations activities. Accompanying information on the community website.	Meetings during 2024. Follow-up as required during 2025. Approval for tunnel expected in 2025. Construction of the tunnel is then expected to commence promptly.
	Municipal, regional, national authorities.	Engagement meetings with regulatory authorities on application	Q4 2024 through to approval during 2025
Land Acquisition & Compensation	Landowners & Land users	Information & public meetings on the LAACF. Engagement meetings with landowners and land users Publication and explanation of the Grievance Mechanism Accompanying information on the community website	Engagement and process to commence Q1 2026 through to completion 2026/2027
Stakeholder Engagement Plan	Local households & directly and indirectly affected communities (including vulnerable groups).	Public disclosure and participation including publication and explanation of the Grievance Mechanism.	Drafting Q1 to Q3 2025. Disclosure & Consultation Q4 2025. Final SEP Q1 2026.

⁴ Local Households & Communities will include affected vulnerable groups/individuals

Key Project Activity	Target Stakeholder Group(s) ⁴	Stakeholder Engagement Actions & Methods	Schedule or Frequency of SE Action
	Political institutions & administration. International, national and local interested groups. Municipal, regional, national authorities.	Publications in local media (e.g. local advertising papers), press releases and media relations activities. Accompanying information on the community website. Publication of annual update of the SEP.	
Permitting			
Spatial Planning Procedure	Local households & directly and indirectly affected communities (including vulnerable groups) Political institutions & administration International, national and local interested groups Municipal, regional, national authorities	Public disclosure and participation in accordance with statutory public participation requirements Publications in local media (e.g. local advertising papers), press releases and media relations activities Accompanying information on the community website	Spatial planning procedure End of Q2 to Q4 2025
Permitting (including General Operating Plan)	Local households & communities (including vulnerable groups) Political institutions & administration International, national and local interested groups Municipal, regional, national authorities	Information & public meetings Press releases & media work (i.e. local advertising newspapers) Accompanying information on the community website	Technical studies to commence in 2025. Application for mining law planning approval in 2026 after completion of the DFS. Planned completion of the mining law planning approval process and other relevant permits, including EIA, in 2027 prior to construction.
Environmental & Social Impact Assessment (ESIA):			
ESIA Scoping Study	Local households & directly and indirectly affected communities (including vulnerable groups). Political institutions & administration. International, national and local interested groups. Municipal, regional, national authorities.	Public disclosure and participation of ESIA Scoping Report, will include community engagements. Letters to stakeholder target groups with request for active feedback Publications in local media (e.g. local advertising papers), press releases and media relations activities Accompanying information on the community website	Drafting Q4 2024 to Q2 2025. Disclosure for comment Q4 2025.
ESIA Development (Baseline Surveys, Impact Assessment & Mitigation)	Local households & directly and indirectly affected communities Political institutions & administration. International, national and local interested groups.	Public disclosure and participation, including community engagements. Publications in local media (e.g. local advertising papers), press releases and media relations activities. Accompanying information on the community website.	ESIA Development: Q1 2026 for 12-18 months

Key Project Activity	Target Stakeholder Group(s) ⁴	Stakeholder Engagement Actions & Methods	Schedule or Frequency of SE Action
	Municipal, regional, national authorities. Local/regional ecologists / experts (including vulnerable groups) (e.g. biodiversity – fish).	Focused consultation with local /regional ecologists and related stakeholders will be undertaken on potential for impacts on protected species and those conserved in the nearby Natura 2000 protected areas.	
ESIA Disclosure & Report	Local households & directly and indirectly affected communities (including vulnerable groups). Political institutions & administration. International, national and local interested groups. Municipal, regional, national authorities.	Public disclosure and participation Publications in local media (e.g. local advertising papers), press releases and media relations activities. Accompanying information on the community website.	ESIA Disclosure: mid 2027
Feasibility Studies & Engineering Design			
Preliminary Feasibility Study (PFS)	Local households & directly and indirectly affected communities (including vulnerable groups). Political institutions & administration. International, national and local interested groups. Municipal, regional, national authorities.	Summary of PFS to be disclosed Information and public meetings on the PFS results and general project updates. Publications in local media (e.g. local advertising papers), press releases and media relations activities. Accompanying information on the community website.	PFS: summary published end Q1 2025
Definitive Feasibility Study (DFS) & Front-End Engineering Design (FEED)	Local households & directly and indirectly affected communities (including vulnerable groups). Political institutions & administration. International, national and local interested groups. Municipal, regional, national authorities.	Information and public meetings on the DFS results and general project updates. Publications in local media (e.g. local advertising papers), press releases and media relations activities. Accompanying information on the community website.	DFS: completion 2026 FEED: commence 2027

Following engagement with authorities and ESIA Scoping process, any consultation activities related to transboundary matters will be added to the main ESIA programme.

Grievance Mechanism

A Project grievance mechanism (“GM”) has been established, which serves as a formalised procedure for receiving, acknowledging, investigating and processing grievances from stakeholders affected by the Project.

It ensures transparency, fairness and accountability and promotes trust between the Company and its stakeholders. This grievance mechanism was developed in line with the latest EBRD guidance

(March 2023)⁵ and is in line with international best practice for responsible corporate behaviour. The mechanism was developed in line with the effectiveness criteria for grievance mechanisms in the United Nations Guiding Principles on Business and Human Rights.⁶

Any individual, organisation, community or institution can report a grievance related to the Zinnwald Lithium Project teams or our contractors' activities through the following GM process. Grievances can relate to the Project's environmental and social impacts, including those related to land acquisition, community health, safety and security, cultural heritage, emissions (noise/air/water etc.), biodiversity, changes in land use, Project personnel conduct issues and regarding stakeholder engagement.

The grievance mechanism comprises a series of steps (below), which are shown in the Figure 3:

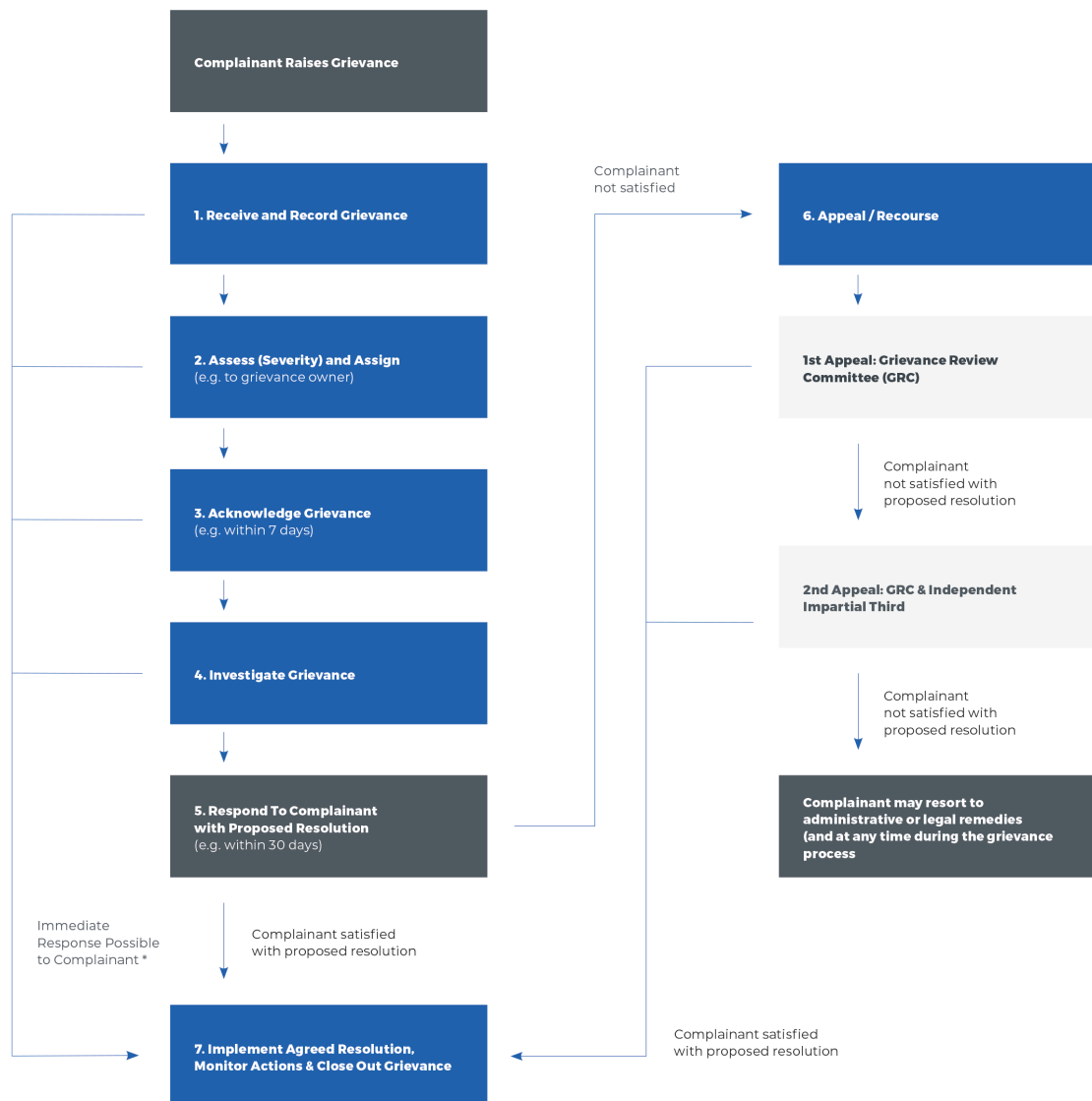
1. Receive and Record Grievance – A complaint is raised, and the grievance is recorded.
2. Assess (Severity) and Assign – The grievance is assessed for its severity and assigned to the appropriate person typically within 7 days.
3. Acknowledge Grievance – The grievance is acknowledged, typically within 7 days.
4. Investigate Grievance – A thorough investigation of the grievance is conducted.
5. Respond to Complainant with Proposed Resolution – A response with a proposed resolution is given, usually within 30 days.
6. Appeal/Recourse – If the complainant is not satisfied with the proposed resolution, they can appeal or seek recourse, typically within 10 days. A committee to be set up will make a final decision, typically within 20 days. If Complainant does not accept the solution proposed by the Committee, they can lodge a second appeal. The second appeal step will include third-party mediation. An independent impartial third-party acceptable to the Complainant may review the grievance and proposed solution.
7. Implement Agreed Resolution, Monitor Actions & Close Out Grievance – Once a resolution is agreed upon, it is implemented, and the grievance is closed.

Throughout the process, if the complainant is still unsatisfied after appeals, they can seek administrative or legal remedies at any time.

⁵ [EBRD PR10 Stakeholder Engagement Guidance](#)

⁶ [GuidingPrinciplesBusinessHR_EN.pdf](#)

Figure 3: Grievance Mechanism



* Sometimes on receipt and initial assessment of a grievance it is possible for a Project to identify a proposed resolution immediately. Where this is possible an immediate response on the proposed resolution for the grievance should be given to complainant.

How can a grievance be submitted?

A grievance can be submitted verbally or in writing through these channels:

- In-person with project representatives
- Dedicated grievance forms (available in German and English) at ZLG Office Altenberg, ZLG Office Dresden, Altenberg Municipality. The grievance form can be found in Annex 2 of this SEP.

- By phone (+49 (0)351-20603833), by Email (beschwerde@zinnwaldlithium.de) or an online portal (www.lithium-im-erzgebirge.de/beschwerden).
- Suggestion box in public areas in Altenberg.
- By letter mail to Zinnwald Lithium GmbH, Zinnwalder Straße 15, 01773 Altenberg

Reporting a grievance is free and does not require payment. At all times, Complainants are also able to seek available legal and administrative remedies.

A grievance can be submitted anonymously. Grievances will be handled discreetly and carefully to protect complainants from retaliation where this might be a concern. The Project will not tolerate actions of retaliation and will investigate any allegations of retaliation. Where a person might feel uncomfortable raising a grievance with a person of for example a different gender, religion or any other orientation then the option to hold discussions with someone of, for example, the same gender or suitable to mitigate the specific discomfort will be offered where possible.

Monitoring, Evaluation & Reporting

At key Project stages, a comprehensive analysis of the Project and the stakeholder involvement is carried out. Information on the results of the analysis will be published including via the following channels:

- Local and national media to demonstrate transparency and reach stakeholders
- Official correspondence and meetings to provide information on issues affecting local communities
- Focus groups/small group meetings to identify or monitor impacts and agree and implement measures to mitigate negative consequences where necessary
- Reporting on E&S performance on the Project website, available in hard copy at the Company offices and in person if required, including details of grievance management
- Level of detail and frequency of reporting will be determined during the pre-construction and construction phase in E&S studies and stakeholder engagement but will include at least annual reporting.

Contact Details & Responsibilities

This SEP has been prepared to the best of our knowledge and takes into account current practices, including applicable international and national regulations. It contains the relevant provisions and the measures and activities derived from them that are necessary for the continuous and dialogue-based involvement of the various stakeholder groups.

Zinnwald Lithium GmbH is responsible for the implementation and execution of the listed measures. The company is supported by competent and efficient service providers.

Zinnwald Lithium GmbH

Zinnwalder Straße 15

01773 Altenberg

E-Mail: info@zinnwaldlithium.de [mailto:](mailto:info@zinnwaldlithium.de)

Telefon: +49 351 20603835

WeichertMehner Unternehmensberatung für Kommunikation GmbH & Co. KG

An der Dreikönigskirche 5

01097 Dresden

E-Mail: zinnwald.lithium@weichertmehner.com

Annex 1: Glossary

Term	Definition
Complainant	Person or group of people/organisation that has a grievance against the Project or its contractors and subcontractors, and who submits a grievance
Grievances or complaints	A grievance or complaint is an expression of dissatisfaction with the Project activities (actual or perceived), typically referring to allegations of a specific incident or impact. Complainant may be seeking a specific solution Project activities include Project company actions as well as contractor and subcontractor actions The terms “grievance” and “complaint” can be used interchangeably, without presuming differences in scale, complexity or seriousness
Grievance Mechanism	Non-judicial process managed by the Project for receiving, acknowledging, investigating and responding to grievances or complaints. Should include what will happen if a complainant is not satisfied with the proposed resolution. Does not affect a complainant’s access at any point to judicial or administrative remedies.
Information disclosure	Information disclosure is a one-way process and refers to the body of documents related to a project that are placed in the public domain, whether or not a project promotor is required to do so.
Meaningful consultation	Meaningful consultation is a two-way process that: • will begin early in the project planning process to gather initial views on the project proposal and inform project design • encourages stakeholder feedback, particularly as a way of informing project development and engagement by stakeholders in the identification and mitigation of E&S risks and impacts • continues on an ongoing basis • is based on the prior disclosure and dissemination of relevant, transparent, objective and easily accessible information in a time frame that enables consultations with stakeholders • undertaken in a culturally appropriate format, in relevant local language(s), is understandable to stakeholders and takes into consideration stakeholders’ decision-making processes • considers and responds to feedback • supports active and inclusive engagement with project-affected parties including disadvantaged or vulnerable groups • is free from external manipulation, interference, coercion, discrimination, intimidation and retaliation • is documented by the client.
Stakeholders	Stakeholders are those who will be or are likely to be affected (directly or indirectly), positively or negatively, by a project (project-affected parties), as well as those who may have an interest in, or may influence, the project (other interested parties).
Vulnerable groups (or people)	“Vulnerable groups” refers to people who, by virtue of gender identity, ethnicity, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include people living below the poverty line, the landless, the elderly, women- and children-headed households, refugees, internally displaced people, minority ethnic people, natural resource-dependent communities or other displaced persons who may not be protected by national and/or international law.

Complaint form Zinnwald Lithium

reference number:.....

first name:

surname:

☐ I would like to submit my complaint anonymously

☐ I request that my identity not be disclosed without my consent

Note: we cannot reply to you if you:

- remain anonymous or
- do not sign the privacy policy.

Contact data

Please contact me:

☐ by mail:

.....

☐ by phone:

☐ by email:

preferred language for communication

☐ German

☐ English (standard, if nothing ticked)

Description of the incident or complaint

What happened? Where did it happen? Who was affected? What are the consequences of the problem?

Add further pages if necessary

Date of the incident or complaint

- ☐ Single incident/complaint (Date:)
- ☐ Occurred several times (How often?)
- ☐ Ongoing (problem still exists)

In my opinion, the following steps should be taken to solve the problem:

Add further pages if necessary

☐ I have taken note of [the privacy policy](#) and accept it (the QR code will take you there).



Signature of the complainant to the privacy policy
if not anonymous:

.....

Date:

.....

Please send this form to:

Zinnwald Lithium GmbH
Zinnwalder Straße 15
01773 Altenberg

or

E-Mail: beschwerde@zinnwaldlithium.de

To be filled in by Zinnwald Lithium GmbH:

Complaint received by:

Name of the person
receiving the complaint:

position:

signature:

date:

COPY:

☐ Complainant

☐ Recipient

☐ Complaints officer

☐ Archive copy