

PURPOSE

This policy describes Valhalla's proportionate approach to environmental responsibility, sustainability and community considerations in its projects and operations.

PUBLIC COMMITMENT

- Environmental and community considerations are addressed in proportion to the nature and location of the activity.
- Valhalla seeks to avoid or reduce material adverse impacts and comply with applicable approvals and agreements.
- Public sustainability and impact claims should be evidence-based and appropriately qualified.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Application and governance approach

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

Many Valhalla activities are data, research or office based and may have limited direct physical impact. More detailed planning is expected where work involves field access, sampling, contractors, landholders, communities, equipment or potential environmental disturbance.

2. Project planning

Relevant projects should consider applicable approvals, land access, cultural heritage, biodiversity, waste, water, energy, emissions, rehabilitation, noise, traffic, community expectations and cumulative impacts. The assessment may be incorporated into a project plan or risk assessment rather than a separate environmental system.

3. Avoidance and mitigation

Valhalla seeks first to avoid material harm where reasonably practicable, then to reduce or manage remaining impacts. Controls should be suited to the activity and may include timing, location, method, contractor requirements, waste management, rehabilitation and monitoring.

4. Community and landholder relationships

Engagement should be timely, respectful and clear about the stage and limits of a project. Valhalla should avoid creating expectations of outcomes, jobs, investment or exploration success that have not been

approved or are uncertain. Commitments made to communities or landholders should be recorded and assigned for follow-up.

5. Sustainability information and claims

Valhalla may describe initiatives and performance where there is a reasonable evidence base. Targets, carbon, biodiversity, social impact or other quantified claims should identify relevant boundaries, assumptions and methodology. Aspirations should not be presented as achieved outcomes.

6. Incidents and improvement

A material environmental or community incident should be escalated and addressed in accordance with applicable law, approvals and project arrangements. Lessons may be incorporated into future project design. A separate sustainability report or standing committee is not required unless the Board, law or a partner arrangement requires it.

Related documents

- First Nations Engagement, Indigenous Data and Cultural Heritage Commitment
- Health, Safety, Fieldwork and Remote Operations Commitment
- Enterprise Risk Governance Statement
- Technical Claims, Methodology and Corrections Statement

Document control and approval

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Approved by	C.Dubieniecki	Approved date	August 12th 2026
Review cycle	Bi-Annually or as board requires	Review date	August 12th 2028
Internal source	Environment, Sustainability and Community Policy		

PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.