

Health and Safety Policy

We believe the health and safety of our employees, partners and any other party involved in our activities ('Our People') is paramount and is everyone's responsibility. We aim to protect people by ensuring the right policies and programs are in place to support their well-being. Our health and safety commitments as stated in [our sustainability approach](#), and the fundamental principles of our 'Zero-Harm' culture reflects this aim.

SCOPE

We require all employees of The Metals Company and its subsidiaries in addition to our contractors to understand, respect, and act in accordance with the commitments in this policy. We require our suppliers to comply with our Supplier Code of Conduct and encourage all of our business partners in the value chain to endorse similar commitments to those included in this policy.

OUR APPROACH

We are committed to implementing robust systems and processes to identify, manage and mitigate health and safety risks for Our People today, tomorrow, and always. Our Health & Safety culture is focused on engaging the people involved with our operations, as well as those responsible for developing the processes that form the building blocks of how we manage and mitigate health and safety risks. We empower Our People to be accountable for health and safety risks in the workplace and ensure that they are provided with the relevant training to ensure that they are competent and are clear on their role and responsibilities as it relates to health and safety.

Individuals who guide, lead, supervise and manage Our People (Our Leaders) are responsible for creating a culture where Our People feel safe to speak up and voice concerns without fear of retaliation. They 'lead by example' and are responsible for ensuring that we deliver on Our Commitments to health and safety.

We are committed to ensuring our safety management system aligns to relevant regulatory frameworks and is benchmarked against best industry practices and guidelines. We have developed our health and safety policy based on the United Nations Convention on the Law of the Sea (UNCLOS), The International Convention for the Prevention of Pollution from Ships (MARPOL), International Maritime Organization Safety of Life at Sea (SOLAS) Convention and International Seabed Authority (ISA). We have also considered the International Labour Organization (ILO), ICMM Performance Expectations, ISO 45001, the United Nations Global Compact and the International Finance Cooperation (IFC) Performance Standards.

OUR COMMITMENTS

Our Leaders will:

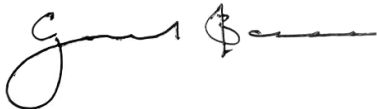
1. Ensure our work practices will **comply with all applicable laws, regulations, and standards** in the jurisdictions relevant to our operations.
 2. Develop and **implement a health and safety management system** to identify, understand and mitigate hazards and risks arising from our activities.
 3. Promote a **culture based on identification and reporting** where Our People raise hazards and incidents with confidence knowing that they will be actioned and investigated immediately.
 4. **Regularly test the effectiveness of our health and safety management system** by performing regular audits and inspections, and proactively making improvements as required.
 5. Ensure that there are **adequate resources allocated to all activities and operations** to ensure compliance with the processes and systems detailed in this policy.
 6. **Be transparent in talking about our health and safety performance** and seek input from Our People on ways to reduce risks and improve our performance.
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Our People will:

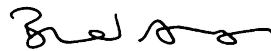
7. Ensure they are familiar with and **comply with all company policies, procedures and instructions including those related to health and safety.**
8. **Always act in a manner that is consistent with our Code of Conduct** and that does not intentionally endanger or harm themselves, their colleagues, or their communities.
9. **Proactively report all hazards, at-risk behaviors, and incidents immediately** to their supervisor or manager.

REPORTING

Our commitment to advance 'Zero Harm' and the protection of the Health and Safety of Our People is everyone's responsibility. Any employee who becomes aware of any suspected or actual violation of this Policy or the law is obligated to report the violation to their supervisor, manager, TMC's General Counsel, or the [Company's Whistleblowing Hotline](#)¹. Any person — whether internal or external to TMC — may report to the Hotline any concern or suspected policy violation on an anonymous and confidential basis and without fear of reprisal.



Gerard Barron
Chairman and Chief Executive Officer



Brendan May
Sustainability and Innovation Committee Chair

TMC's sphere of influence rests on the ethics and integrity of all TMC employees and collaborators and the reliance on their reporting of Health and Safety hazards, risks, and incidents. The Sustainability and Innovation Committee of The Metals Company's Board of Directors is responsible for the governance of Health and Safety and to oversee compliance with this policy. We review this policy on an annual basis.

Approved on June 20, 2024

¹ The international number of TMC's Ethics Hotline is 001-(833) 626-1527. More information is available on the Ethics Point website using the link "<https://secure.ethicspoint.com/domain/media/en/gui/80968/index.html>".