Privacy Policy

Version: 1.0 | Last updated: June 2026

Neo Energy Metals plc ("Neo Energy Metals", "we", "us", or "our") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you visit our website at www.neoenergymetals.com (the "Website"). Please read this policy carefully. If you disagree with its terms, please discontinue use of the Website.

Neo Energy Metals plc is a company incorporated in England and Wales (Company Number: 09690089) and listed on the Main Market of the London Stock Exchange (LSE: NEO) and A2X Markets. For the purposes of applicable data protection legislation, including the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018, Neo Energy Metals Plc is the data controller. Where the Protection of Personal Information Act, 2013 ("POPIA") applies, Neo Energy Metals Plc acts as the responsible party in relation to the personal information it processes through the Website.

1. Information We Collect

1.1 Information You Provide Directly

We may collect personal information that you voluntarily provide when using the Website, including:

- Your name, email address, and contact details when you complete an enquiry or contact form;
- Your name and email address when you register to receive investor news, regulatory announcements, or other communications;
- Information included in correspondence or enquiries submitted through the Website; and
- Any other information you choose to submit via the Website.

1.2 Information Collected Automatically

When you visit our Website, we may automatically collect certain technical and usage information, including:

- Your IP address, browser type and browser version;
- Pages visited, time spent on pages, referring URLs and interaction with Website content;
- Device identifiers, operating system and approximate location derived from IP address; and
- Information collected through cookies and similar tracking technologies, as described in Section 6.

1.3 Information from Third Parties

We may receive information about you from third-party sources, including publicly available databases, regulatory platforms, investor relations service providers, analytics providers, professional advisers and other sources where permitted by law.

2. How We Use Your Information

We use the personal information we collect for the following purposes:

- To respond to your enquiries and provide information you have requested;
- To send regulatory announcements, financial results, investor updates, and other communications to which you have subscribed;
- To administer investor relations and comply with our obligations as a company listed on the London Stock Exchange, including obligations under the UK Market Abuse Regulation (UK MAR) and applicable Disclosure Guidance and Transparency Rules;
- To administer, maintain, secure and improve the Website and analyse usage patterns;
- To manage records, compliance, legal, audit, corporate governance and reporting obligations;
- To comply with applicable legal obligations and respond to lawful requests from regulators, exchanges, courts, law enforcement agencies or other competent authorities;
- To protect our rights, property, operations and the safety of our users; and
- To manage any corporate transaction, restructuring, merger, acquisition, sale or transfer of assets.

3. Legal Basis and POPIA Justification Grounds

Where the UK General Data Protection Regulation (UK GDPR) applies, we rely on the following legal bases for processing your personal information:

- **Consent:** where you have given clear consent for a specific purpose, such as subscribing to certain communications or consenting to non-essential cookies;
- **Legitimate Interests:** where processing is necessary for our legitimate interests as a publicly listed company, provided those interests are not overridden by your rights and freedoms;
- **Legal Obligation:** where processing is necessary for compliance with a legal obligation to which we are subject, including obligations to regulatory authorities, stock exchanges and other competent bodies; and
- **Contract:** where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.

Where POPIA applies, we process personal information only where a recognised justification ground applies, including where you consent to the processing, where processing is necessary to conclude or perform a contract, where processing complies with a legal obligation, where processing protects a legitimate interest of the data subject, where processing is necessary for the proper performance of a public law duty by a public body, or where processing is necessary to pursue our legitimate interests or those of a third party to whom the information is supplied.

4. Sharing Your Information

We do not sell your personal information. We may share your personal information with:

- Service providers and data processors/operators who assist us in operating the Website and delivering services, such as website hosting, investors relations platforms, email distribution, analytics, IT support and cyber security providers, subject to appropriate contractual safeguards;
- Professional advisers, including legal, financial, technical, tax audit, corporate finance and governance advisers, where necessary and under obligations of confidentiality;
- Regulatory authorities, stock exchanges, courts, law enforcement agencies and other competent authorities where required or permitted by law; and
- Any successor or prospective successor entity in the event of a merger, acquisition, reorganisation, restructuring, financing or transfer of all or part of our business or assets.

We require all third parties who process personal information on our behalf to respect the security and confidentiality of the information and to process it only in accordance with our instructions and applicable law.

5. Direct Marketing and Investor Communications

If you subscribe to investor communications, regulatory updates or other communications, we will use your contact details to send those communications to you. You may unsubscribe or withdraw your consent at any time by using the unsubscribe link in the relevant communication or by contacting us using the details in Section 12. Withdrawal of consent does not affect processing carried out before withdrawal.

6. Cookies and Similar Technologies

Our Website uses cookies and similar technologies to distinguish you from other users, operate the Website, improve browsing experience, understand Website usage and support Website security. Cookies are small text files placed on your device by a web server.

We use the following categories of cookies:

- **Strictly Necessary Cookies:** essential for the Website to function and for security, network management and accessibility. These cannot usually be switched off in our systems; ;
- **Performance and Analytics Cookies**: help us understand how visitors interact with the Website; and

- **Functionality Cookies:** allow the Website to remember choices you make, such as preferences or settings; and

You can control or delete cookies through your browser settings. Where required by law, we will seek your consent before placing non-essential cookies or similar technologies on your device. You may withdraw or change your cookie preferences at any time through the Website's cookie settings, where available.

7. International Transfers

Neo Energy Metals operates internationally and may use service providers, advisers, group companies or other recipients located outside the United Kingdom, European Economic Area and South Africa. Where we transfer personal information to a country that does not provide an equivalent or adequate level of protection, we will implement appropriate safeguards required by applicable law. These may include adequacy regulations or adequacy decisions, the UK International Data Transfer Agreement or UK Addendum to EU standard contractual clauses, EU standard contractual clauses, POPIA-compliant contractual protections, binding corporate rules or another lawful transfer mechanism.

Neo Energy Metals operates internationally and may use service providers, advisers, group companies or other recipients located outside the United Kingdom, European Economic Area and South Africa. Where we transfer personal information to a country that does not provide an equivalent or adequate level of protection, we will implement appropriate safeguards required by applicable law. These may include adequacy regulations or adequacy decisions, the UK International Data Transfer Agreement or UK Addendum to EU standard contractual clauses, EU standard contractual clauses, POPIA-compliant contractual protections, binding corporate rules or another lawful transfer mechanism.

Where POPIA applies, we will only transfer personal information outside South Africa where POPIA permits the transfer, including where the recipient is subject to a law, binding corporate rules or agreement that provides an adequate level of protection, where the data subject consents, where the transfer is necessary for contract performance, or where another applicable POPIA transfer ground applies.

8. Data Retention

We retain personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, accounting, audit, tax, market abuse, corporate governance or reporting requirements. To determine the appropriate retention period, we consider the nature and sensitivity of the information, the purpose of processing, potential risk from unauthorised use or disclosure, applicable limitation periods, legal and regulatory requirements and whether we can achieve the purpose through anonymisation.

We retain your personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, accounting, audit, tax, market abuse, corporate governance or reporting requirements. To determine the appropriate retention period, we consider the nature and sensitivity of the information, the purpose of processing, potential risk from unauthorised use or disclosure, applicable limitation periods, legal and regulatory requirements and whether we can achieve the purpose through anonymisation.

9. Your Rights

Subject to applicable law, you may have the following rights in relation to your personal information:

- **Right of Access**: to request confirmation of whether we process your personal information and to obtain a copy of the information we hold about you;
- **Right to Rectification or Correction:** to request that inaccurate or incomplete information be corrected or completed;
- **Right to Erasure or Deletion:** to request deletion of your personal information in certain circumstances;
- **Right to Restrict Processing**: to request that we limit how we use your information in certain circumstances;
- **Right to Data Portability:** to receive certain personal information in a structured, commonly used and machine-readable format
- **Right to Object:** to object to processing based on legitimate interests,

  to object to processing for direct marketing, and, where POPIA applies, to object on reasonable grounds relating to your particular situation; and
- **Rights Related to Automated Decision-Making**: not to be subject to solely automated decisions that produce legal or similarly significant effects, except where permitted by law.
- **To Exercise Any of These Rights**: please contact us using the details in Section 12.

  We may need to verify your identity before responding to a request. We will respond within the period required by applicable law.

To exercise any of these rights, please contact us using the details in Section 12. We may need to verify your identity before responding to a request. We will respond within the period required by applicable law.

10. Security and Security Compromises

We implement appropriate technical and organisational measures designed to protect y personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access and other unlawful processing. These measures may include access controls, secure hosting, encryption where appropriate, vulnerability management, supplier due diligence, confidentiality controls and incident response procedures.

No transmission over the internet is completely secure, and we cannot guarantee the absolute security of data transmitted to or from the Website.

If a personal data breach or security compromise occurs, we will assess and manage it in accordance with applicable law, including notification to the UK Information Commissioner's Office, the South African Information Regulator and/or affected individuals where required.

11. Complaints

We encourage you to contact us first if you have a privacy concern so that we can try to resolve it. You also have the right to lodge a complaint with the relevant supervisory authority or regulator.

- United Kingdom: Information Commissioner's Office (ICO) - www.ico.org.uk

- South Africa: Information Regulator (South Africa) - www.inforegulator.org.za

10. Contact Us

If you have any questions about this Privacy Policy, wish to exercise your rights, withdraw consent to processing, update your performances or make a complaint, please contact:

Data Protection Contact | Information Officer
Neo Energy Metals plc
167-169 Great Portland Street
London W1W5PF
United Kingdom
Email: Frederik@neoenergymetals.com

South African Information Officer if applicable:
Mr. Frederik Brand | Chief Governance and Legal Officer
Email: Frederik@neoenergymetals.com

11. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in law, regulatory guidance, Website functionality, cookies, service providers or our privacy practices. We will indicate the date of the most recent revision at the top of this page. We encourage you to review this policy periodically.[

We may update this Privacy Policy from time to time to reflect changes in law, regulatory guidance, Website functionality, cookies, service providers or our privacy practices. We will indicate the date of the most recent revision at the top of this page. We encourage you to review this policy periodically.