

Gentlemen:

We write in response to your email dated 13 October 2025 addressed to the Officers and Directors of Marcventures Mining and Development Corporation (“MMDC” or the “Company”). In your correspondence, several sweeping and unverified allegations were raised concerning MMDC’s operations, particularly with respect to environmental protection and human rights compliance.

*Fully Compliant*

At the outset, let us make it absolutely clear that MMDC is fully compliant, and therefore categorically rejects any and all baseless, malicious, and defamatory insinuations that cast doubt on our operations and integrity. For years, MMDC has operated in strict compliance with the law – not only securing and maintaining all legally required permits and clearances but also adhering to stringent environmental, safety, and social standards that go well beyond what is required. As the main operating arm of Marcventures Holdings Inc. (“MHI”), MMDC plays a critical role in safeguarding the credibility and market confidence of our publicly listed parent company.

*Extensive Documentation in Place*

Because of this, we will not—under any circumstance—tolerate the circulation of perjurious, fabricated, or malicious statements in any form, including those contained in reports, articles, or other publications. Extensive documentation is in place and we are fully equipped to refute and dismantle whatever gossip, conjecture, or unfounded claims may have served as the source of these allegations.

*Corporation’s Reputation is Paramount*

Let it be clearly understood that corporate reputation is paramount: any individual, organization, or entity—local or offshore—who attempts to malign or damage the hard-earned reputation of MMDC will be met with the full force of all legal remedies available to us under Philippine law and, where applicable, international legal mechanisms. We will pursue every course of action necessary to protect the integrity of this Company, its stakeholders, and its name.

For the sake of transparency and to leave no room for doubt, please refer to our point-by-point response to your queries. We trust that the foregoing has unequivocally clarified our position. MMDC will not be intimidated, nor will it allow itself to be a subject of reckless and irresponsible accusations.

Lastly, we have noticed that we are the only ones to receive such inquiries from your organization. Similar to discrediting our reputable name, we will not tolerate any discriminated attacks for whatever reason, much more so for any representation of the Philippine mining scenario based on the information we have given. We will ensure to protect the image of our country from any false claims with respect to its mining operations.



Atty. Reuben Carlo O. General  
*Authorized Representative*

1. Does MMDC monitor air, water and soil quality? Please provide the results of any air and water quality data you have compiled relating to mining concessions in Surigao del Sur.
  - a. Please provide information about MMDC's water quality testing, if any, including how frequently water samples are taken, where those samples are collected, and what pollutants it tests for.
  - b. Please provide information about MMDC's air quality monitoring, if any, including how frequently air samples are taken, where those samples are collected, and what pollutants it tests for.
  - c. Please provide information about MMDC's soil quality monitoring, if any, including how frequently air samples are taken, where those samples are collected, and what pollutants it tests for.

*Yes, MMDC monitors air and water quality quarterly through a third party in compliance with the condition under MMDC's Environmental Compliance Certificate ("ECC") and reported to Environmental Management Bureau ("EMB") & Mines and Geosciences Bureau ("MGB"). Further, in-house air & water quality is determined and monitored monthly and reported to the EMB and MGB. If we could direct you to please get sample results from either the EMB or MGB.*

*As to soil sampling, MMDC does not monitor soil samples other than the ore and waste material mined from the pit. Note that as to soil samples as to the ore mined and shipped, a representative sample is provided to and the results thereof are submitted to MGB.*

2. Does MMDC make the results of any pollution monitoring public? If so, please explain how community members are able to access that information. Please provide the results of any air and water quality data you have compiled relating to mining concessions in Surigao del Sur.

*Yes, MMDC makes the results of any pollution monitoring public through its submissions to the EMB, and also during multi-partite monitoring team ("MMT") meetings. Any issue on the matter is discussed and recorded with minutes of the meeting. If we could direct you to get the results from the EMB or information from the MGB, which is available to stakeholders.*

3. Individuals interviewed by Climate Rights International from Cantilan and Madrid, Surigao del Sur, were concerned over the impacts of MMDC's operations on the Caraca-an River. What steps is MMDC taking to ensure that its operations are not causing freshwater pollution, including of the Caraca-an River?
  - a. Please provide information about MMDC's water quality testing relating to the Caraca-an River, including how frequently water samples are taken, where those samples are collected, and what pollutants are tested.
  - b. Please provide information about MMDC's pollution abatement measures.

**Please provide information about how MMDC manages its tailings and other mining waste, including what steps MMDC takes to ensure that tailings ponds are able to withstand extreme weather events.**

*MMDC have taken the following steps over the years of its operations:*

- 1. Reporting and discussion at the MMT and Mine Rehabilitation Fund Committee ("MRFC") pollution caused by illegal small-scale miners adjacent to the river.*
- 2. Reporting and discussion at the Community Environment and Natural Resources Office ("CENRO") office pollution caused by illegal small-scale miners adjacent to the river.*
- 3. Reporting and discussion at the MMT and MRFC pollution caused by gravel quarrying of the river at Madrid.*

*River sampling is part of the sampling point for the water monitoring as stated in our response to question no. 1 above.*

*MMDC's pollution abatement measures are as follows:*

- 1. Mine rehabilitation- progressive methodology*
- 2. Settling ponds - constructed in series to prolong retention time of silt deposition to settling ponds before release of decanted water to environment*
- 3. Slopes stabilization and revegetation*
- 4. Riparian and buffer zone plantation of bamboos*

*MMDC does not process its mined ore; it does not have any processing plant or facility and as such, it does not have any tailings.*

- 4. It is our understanding that, after a landslide that buried homes, which was triggered by Tropical Storm Basyang in February 2018, MMDC blocked the road to Barangay Babuyan, Carrascal, Surigao del Sur. Please provide information about this event including:**
  - a. Any documentation relating to investigations undertaken by MMDC, MGB, or other agencies examining the potential impacts of MMDC operations on the landslide.**
  - b. Any documentation regarding MMDC's tailing ponds, stockpiles, and cut trees, including any assessment of the impacts of Tropical Storm Basyang on MMDC operations and waste management systems.**
  - c. Information explaining why MMDC security guards were instructed to not allow members of the public or media to enter the road to Barangay Babuyan after the landslide event.**

*This is fake news! We vehemently and categorically deny (a) the said report regarding MMDC's road blockage as a result of Tropical Storm Basyang, and (b) prohibition to the public or media to enter the Barangay Babuyan road. As for the rest of the items requested, request the same before the MGB, which is the repository of your requested information.*

5. **Climate Rights International has reviewed documents related to MMDC's December 2024 request for a Special Tree Cutting Permit. Please provide evidence, for example, satellite imagery or other documentation, supporting MMDC's January correspondence that the trees had not been cut prior to applying for the permit.**

*MMDC would like direct you to please get the information and data from the CENRO office at Cantilan. MMDC maintains its unsullied reputation of protecting the environment; it will never perform any tree cutting activity without an approved Special Tree Cutting Permit.*

6. **Regarding the lawsuit Jaime "Datu Dagsaan" Bat-ao, Liquisa Irrigators Association, Represented by Peter William Olan, Nagkahugpong Managatay Para sa Kalambuan Nan Ayoke (NAGMAKAAYO), hereby Represented by Crisologo E. Anino, Sr., Lydia L. Lascano, and Nick Matthew Q. Iriberry, a minor represented by his Father, Vicente Cirilo Iriberry vs. Marcventures Mining and Development Corporation:**
  - a. **Multiple plaintiffs told Climate Rights International that they suffered from intimidation after filing the lawsuit, including having suspicious men on motorcycles visiting their private residences. Is MMDC aware of any intimidation of plaintiffs? What steps, if any, did MMDC take to prevent such intimidation?**
  - b. **Climate Rights International heard allegations that MMDC intentionally hired the family members of judges in the case in order to prolong the case. Please provide a full list of all legal professionals hired by MMDC or its parent company, Marcventures Holdings Inc., since the start of the litigation.**

*Again, another series of fake news. We vehemently and categorically deny any reports of intimidation. MMDC has always maintained excellent relations with the local communities and we never employ such underhanded tactics in dealing with the local community.*

*As to the hiring of family members of judges, we do not engage in such an unethical practice. It is in the best interest of MMDC that the said case be decided as soon as possible given the status of its parent company as a publicly listed entity. It is counterintuitive to maintain or even prolong a case with serious allegations while promoting the attractiveness and marketability of our securities. As to the list of legal professionals, we are barred by our data privacy laws from disclosing them as information as to their employment background and education is considered as sensitive personal information.*

7. **What steps does MMDC take when it receives an allegation of environmental pollution or negative impacts of its operations on local communities? Does MMDC have a grievance mechanism through which community members can file a complaint? If so, please provide information regarding that mechanism, including how often it is used, how community members can access it, and how MMDC responds to complaints.**

*MMDC's management listens and hears the complaint and MMDC's technical personnel evaluates the validity of the complaint before it is discussed with the complainant. If the complainant is not satisfied with the explanation of MMDC, the issue is brought up to the barangay local government unit, municipal local government unit, and/or the MMT for further discussion and resolution. This process is well established during all our operating activities.*

**8. Does MMDC have climate adaptation plans, including plans to adapt to extreme weather events? If so, please elaborate.**

*For now, MMDC is still formulating its plans with respect to climate adaptation.*

*As per MMDC's analysis, the biggest climate-related risk is rainfall.*

*The amount and frequency remain unknown and the risk impacts production and shipment operations. To identify and assess climate-related risks, MMDC uses historical rainfall data. This is gathered daily from strategic locations of the site operations. The combination of statistical projections and long-term weather forecasts allows the Company to identify and project rainy days for operational use. The process of managing climate-related risks is integrated into the organization's overall risk management. To assess and manage risks, the number of working days, the intensity, and the frequency of rainfall in a week are used as metrics for operations. The Company manages risks with weekly stewardship and monitoring of the intensity and frequency of precipitation. It strives to reduce mining disturbance, energy and water consumption, and waste generation. More importantly, it continues to plant more trees, revegetate, and rehabilitate mined out areas to reduce the Company's carbon footprint. Other initiatives are pre-deployment inspections of mining equipment to confirm that it is in good running condition, reduction of energy consumption in offices and campsites, reduction of water consumption, and reusing and recycling of materials to reduce solid wastes.*

**9. It is our understanding that the nickel ore mined by MMDC in Surigao del Sur is exported to China. Is all nickel ore mined by MMDC in Surigao del Sur and elsewhere in the Philippines exported? Please provide a list of companies that purchase nickel ore from MMDC, including its Surigao del Sur mine, and companies involved in the export of nickel ore mined by MMDC.**

*Yes, all of the nickel ore mined by MMDC at its minesite in Surigao del Sur is exported. MMDC would direct you to please get the information and data from the MGB.*

**10. Did MMDC hold public meetings with local communities about the proposed project before the commencement of mining? If so, please provide information about the dates, locations, and attendance of those meetings, including information about how community members were made aware of the meetings. In addition, please detail the information provided to communities at those meetings.**

*MMDC has an approved/existing Declaration and Mining Project Feasibility (“DMPF”) and approved/existing ECC. The DMPF is a pivotal document in the Philippine mining permitting process. It marks the transition from exploration to commercial extraction and is required before a Mineral Agreement holder can begin full-scale mining operations. Prior to approval of DMPF, several rigorous public meetings with local communities about the project are held.*

**11. Has MMDC held any public meetings with local communities since the commencement of mining? If so, please provide information about the dates, locations, and attendance of those meetings, including information about how community members were made aware of the meetings. In addition, please detail the information provided to communities at those meetings.**

*Yes, we have held several public meetings in the past. Prior to approval of DMPF, several intensive public meetings with local communities about the project are held as follows:*

- 1. In ECC processing, public scoping and public hearings are conducted supervised by EMB.*
- 2. In securing for Certificate of No Objection or Resolution of favorable endorsement and/or endorsement interposing no objection to the project, the mining company conducts Information, Education and Campaign to Host and Neighboring Barangay/s, Municipality/ies and Province/s;*
- 3. In securing community development commitments for Social Development and Management Program (SDMP), the Representative from Host and Neighboring Communities (RHNC) are formed. During the Annual SDMP, RHNC are being consulted.*
- 4. MMDC tenement is located within Certificate of Ancestral Domain Title (CADT 238), thus, MMDC attended community assemblies in the preparation of a MOA as a prerequisite of FPIC Process for the issuance of Certification Pre-condition from NCIP.*

*During mining operations:*

- 1. In securing for STCEP, Certificate of No Objection or Resolution of favorable endorsement and/or endorsement interposing no objection to the cutting of trees is secured.*
- 2. IEC under the SDMP/Annual SDMP is implemented.*
- 3. MMT and MRFC are held quarterly*

*Again you can get the information and data from the MGB regarding the said public meetings for further details.*

**12. Does MMDC have plans to renew its MPSA, which is set to expire in 2027? If so, please provide information about MMDC’s 25-year plan for mining from the period of 2027 to 2052, as well as documentation regarding the MPSA renewal.**

*The Management of MMDC is still evaluating the options available with respect to its rights under the Mineral Production Sharing Agreement (“MPSA”).*

**13. Please provide a list of all subcontracting companies that work with MMDC at its Dinagat Islands nickel mining operations. What steps does MMDC take to ensure that individuals hired by subcontractors are properly compensated and have access to occupational health and safety protections?**

*To confirm, we do not have any mining operations in Dinagat Island, nor any contracts in relation to mining operations with respect to MPSA holders in Dinagat Island. As such, we feel that this query about further Dinagat Island mining operations has been wrongfully placed upon MMDC.*