

prepared by

**Enviro Dynamics**

# **Updated Environmental Management Plan**

For Proposed Base & Precious  
Metals Prospecting Activities  
on EPL 5772 and 6011 (previously  
EPL 3905 and 3238)

**Khomas Region,  
Namibia**

**February 2024**



## DOCUMENT INFORMATION

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### Updated EMP, 2024

Green Gain Consultants cc was appointed by the proponents to apply for the renewal of the ECC-0124 which expires on 2024-02-24. As part of the renewal process, the consultant reviewed the initial EMP and updated the information in the EMP to suit the current environmental settings and proposed activities. Thus, this report represents an updated EMP for the ongoing exploration of Base & Precious Metals Prospecting activities on Exclusive Prospecting Licences (EPLs) 6011 and 5772 in the Khomas Region, Namibia.

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# Environmental Management Plan (EMP)

## 1. Introduction

This Environmental Management Plan (EMP) has been drafted as part of the Scoping Report which was conducted in terms of the Environmental Assessment for the exploration of base metals on exclusive prospecting licenses 5772 and 6011 Khomas Region, Namibia. The contents satisfy the requirements of the Regulations of the Environmental Management Act, 2007 (Act No 7 of 2007) Regulation No 30 of 2011 listing No 8(j) (aa) (bb) (cc). It provides management measures to be undertaken to address the effects on the environment that have been identified in the Scoping Report.

## 2. Roles and Responsibilities Concerning the Implementation of the EMP

The roles and responsibilities of all parties involved in effectively managing the environment are set out below:

### Environmental Coordinator

The Environmental Coordinator (EC) will inspect the combined EPL area on a three monthly basis to ensure that all specifications are met. The duties of the environmental coordinator will be the following:

Advise the exploration team in respect of implementation of the environmental specifications,

Conduct visits to ensure all work is aligned to the EMP,

The environmental coordinator shall inspect the site during the three-monthly visits. All rehabilitation results will be included in the quarterly report,

Conduct inspections of the rehabilitation area and give guidance regarding rehabilitation measures.

### The Exploration Manager

The duties of the Exploration Manager (EM) or his nominated authority are as follows:

Familiarize themselves with the requirements of the EMP,

Monitor employees' and contractors' compliance with the environmental specifications and enforce adherence,

Communicate all environmental related incidents with the environmental coordinator and distribute internally to avoid repeats,

Maintain a record of activities relevant to environmental management,

The exploration manager shall be responsible for monitoring and the enforcement of the environmental management specifications on a day-to-day basis. Any violation of the environmental specifications shall be recorded and the agreed on disciplinary measures taken.

## Senior personnel and contractors

The duties of the senior personnel/contractors are as follows:

- Familiarize themselves with the requirements of the EMP,
- Comply with the environmental management specifications,
- Ensure that all team members are familiar with the environmental management specifications.

### 3. Environmental Management Requirements

The following are management actions that should be adhered to by the proponent at all times. These management actions cover all phases of exploration; non-invasive exploration (sampling, geophysics, etc) and invasive exploration (drilling). All exploration activities should be carried out in line with this Environmental Management Plan (EMP), as may be applicable to the specific phase and activities carried out.

This section of the EMP details the various management processes, from the beginning of the exploration project to its end, concerning the effective management of all project areas. Please refer to Appendix D of the Scoping Report for legislative and permit requirements considered during this EMP. The EMP is laid out as follows:

- Planning and Design;
- Exploration Contract Preparation Management Requirements; and
- Exploration Mitigation Requirements (see Table 3 for overview)

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS	CONTACT PERSON
Archaeology	National Heritage Act 27 of 2004	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated.	Rev Salomon April Tel: 061-244 375/ 385/594
Environmental	Environmental Management Act 7 of 2007 EIA Regulations (EIAR) GN 57/2007 (GG 3812)	The amendment, transfer or renewal of the Environmental Clearance Certificate (EIAR s19 & 20).	Ms Saima Angula Tel: 061-284 2751
Forestry	Forest Act 12 of 2001 Nature Conservation	Protected tree species and any vegetation within 100 m from a watercourse may not be removed without a permit.	Mr Ambuga Tel:

THEME	LEGISLATION INSTRUMENT	MANAGEMENT REQUIREMENTS	CONTACT PERSON
	Ordinance 4 of 1975	A Harvesting Permit is required if wood is to be collected (harvested) for use as fuel.	061-265 450
Labour	Labour Act 11 of 2007 Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	Labour Law Advice: Tel: 061-309 957
Water	Water Resources Management Act 13 of 2013	Water licences are required for water abstraction and use (s44)	Elize Mbandeka Tel: 061-208 7141

### 3.1 Planning and Design Phase

This phase contains elements that should be considered during the planning and design phase of the holder of the EPLs. These management requirements are important to ensure that safe managing of the environment is planned and for the exploration activities which are proposed. As per the Scoping Report, vulture breeding areas have been identified as areas to be avoided until further investigations have been conducted. These areas are indicated in the attached map. Such investigation should further be included in the planning phase as tabled below.

**Table 1: Management requirements for the Planning and Design phase**

ASPECT	MANAGEMENT REQUIREMENT
EMP IMPLEMENTATION	Develop an effective strategy to accurately carry out the mitigation actions relevant to the exploration activities in this environment Establish an applicable internal disciplinary system for non-compliance
FINANCIAL PROVISIONS	Allocate appropriate budgetary allowances to develop proper exploration planning and environmental rehabilitation actions through the compulsory development of plans and strategies to mitigate negative environmental and social impacts
RECRUITMENT	If recruitment is applicable: Adhere to the legal provisions for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.) in the contract aiming for a 15% representation of women. The recruitment process must be formal and organised Preference should be given to recruit those who live within the

ASPECT	MANAGEMENT REQUIREMENT
STAKEHOLDER COMMUNICATION	project area and are fit to work Communicate planned activities will affected parties through established community communication channels
HEALTH AND SAFETY	Adhere to all legal requirements pertaining to health and safety; and Compile a health and safety plan (See Section B)

### 3.2 Exploration Contract Preparation Management

This phase contains elements that should be considered whenever exploration activities are contracted or sub-contracted to a company other than the holder of the EPL rights. It is further applicable to any related contract work which may be employed by Manmar Investments. These management requirements are important to ensure that safe managing of the environment takes place while exploration activities are ongoing.

**Table 2: Exploration contract preparation management requirements**

ASPECT	MANAGEMENT REQUIREMENTS
EMP IMPLEMENTATION	Relevant sections of this EMP should be included in the tender documents for all development so that tenderers can make provision for implementation of the EMP
FINANCIAL PROVISION	Financial provision for the compilation of a Waste Management Plan should be included as a cost item within tenders concerning exploration operations Financial provision for the facilitation of an induction programme for senior and casual exploration personnel as well as subcontractors and associated personnel should be included as a cost item within tenders concerning all exploration activities Financial provision for the compilation of a Vegetation Management Plan should be included as a cost item within exploration tender documents Financial provision for the drafting of a Communication Plan should be included as a cost item within exploration tender documents
RECRUITMENT	If applicable; Provisions designed to maximise the use of local labour should be included within tenders concerning exploration operations A provision stating that all unskilled labour should be sourced from the area should be included within tenders concerning explorations operations Specific recruitment procedures ensuring local firms enjoy preference during tender adjudication should be included within tenders concerning exploration operations

### 3.3 Exploration Mitigation Details

The following table provides an overview of all the major environmental management themes pertaining to both generic and site-specific exploration mitigation details. This table serves to act as quick reference (by colour), for the detailed mitigation details that follow below, for the implementation of the non-invasive and invasive components of this EMP. The identified impacts in the Scoping Study are mitigated under these themes.



Table 3: Generic and site-specific environmental management actions for exploration phases

THEME	OBJECTIVE	MITIGATION DETAIL	
		GENERIC	SITE-SPECIFIC
<b>Waste management</b>	Avoid and where not possible minimise all pollution associated with exploration	Section A	Section A
<b>Health and safety</b>	Safeguard health and safety of staff and the general public	Section B	N/A
<b>Dust and noise</b>	Avoid and where not possible minimise dust and noise associated with prospecting activities	Section C	Section C
<b>Environmental training and awareness</b>	Awareness creation regarding the provisions of the EMP as well as the importance of safeguarding environmental resources	Section D	N/A
<b>Environmental conservation</b>	Minimise exploration activity footprint and safeguard biodiversity in ecologically sensitive areas	Section E	Section E
<b>Employment/ Recruitment</b>	Minimise negative conflict through legal and fair recruitment practices	Section F	Section F
<b>Stakeholder communication</b>	Provide a platform for stakeholders to raise grievances and receive feedback and hence minimise negative conflict	Section G	Section G
<b>Social and Cultural Heritage</b>	Ensure due consideration is given to matters regarding the cultural and general wellbeing of the affected community and matters incidental thereto	Section H	N/A

## SECTION A: WASTE MANAGEMENT

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Waste Management Plan	The Proponent should compile a Waste Management Plan that should address as a minimum the mitigation measures included below
Hazardous waste	<p>All exploration vehicles (4x4 vehicles and trucks) and equipment on site should be provided with a drip tray/oil spill kit:</p> <ul style="list-style-type: none"> <li>o Drip trays and sealable containers are to be transported with vehicles wherever they go</li> <li>o Drip trays should be cleaned daily and spillage handled, stored and disposed of as hazardous waste</li> </ul> <p>All exploration vehicles should be maintained regularly to prevent oil leakages. Maintenance of vehicles is not permitted to occur on site as far as reasonably possible, but if maintenance is to be undertaken on site, measures need to be put in place to avoid hydrocarbon spillages. Maintenance and washing of exploration vehicles should be conducted at a suitable site/facility which adhere to the following:</p> <ul style="list-style-type: none"> <li>o The work area/facility should be lined to be impermeable</li> <li>o The work area/facility should have an oil-water separator (oil trap) to collect any run-off from the washing and or maintenance activities, or be equipped with an oil and water separation system</li> </ul> <p>Spilled oil or fuel should be treated as hazardous waste, disposed of as it occurs in the appropriate hazardous waste containers (sealable drums) on site, and removed off site at the end of each day to the closest recognised, appropriate hazardous waste disposal site in the vicinity or as soon as possible when working in remote areas. All such waste should be provided to specialists in the handling and treatment of such materials</p> <p>All hazardous substances (e.g. fuel, grease, oil, drilling fluids etc.) or chemicals should be stored in a specific location at the exploration campsite on an impermeable surface which is bunded</p>
Sewage and grey water from temporary portable toilets on site	<p>Use of the toilets instead of the veld must be strictly adhered to. If grey water can be collected from ablution facilities at the campsite it should be recycled and:</p> <ul style="list-style-type: none"> <li>o Used for dust suppression</li> <li>o Used to water vegetable gardens or to support a small nursery in local communities (as and when agreed upon by such communities)</li> <li>o Used to clean equipment</li> </ul>
General waste	<p>The exploration site should be kept tidy at all times. All domestic and general waste produced daily should be contained. No waste may be buried or burned. No waste is to be left uncontained, in suitable containers, over night. Waste containers (bins) should be emptied regularly and removed from site to the nearest official waste disposal site. All recyclable waste needs</p>

ASPECT	MITIGATION MEASURE
	<p>to be taken to the nearest recycling depot if available</p> <p>A sufficient number of separate waste containers (bins) for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such</p> <p>Exploration personnel should be sensitised to dispose of waste in a responsible manner and not to litter</p> <p>No waste may remain on site after the completion of the project</p>
Residual samples	<p>Samples that will not be used for further analysis, or submitted to MME should be taken off site or used (with the required permission from the affected landowner and/or tenant) to repair any possible damaged roads. No samples are to be dumped at site or in the vicinity of the site as to not affect rehabilitation efficiency through physical and chemical pollution of weathering samples</p>
<b>SITE SPECIFIC MITIGATION</b>	
Sewage and grey water from temporary portable toilets on site	<p>Portable toilets such as portable camping units, must be provided during exploration:</p> <ul style="list-style-type: none"> <li>o At all drill sites</li> </ul> <p>Discharging of the portable units are to be conducted at an existing suitable facility</p> <p>The Solid Waste division of the City of Windhoek should be contacted should permission be sought to dump at the municipal landfill site</p>
<b>MONITORING REQUIREMENTS</b>	
<p>Monitor whether the provisions set out in this EMP concerning waste management is being applied as per instructions</p> <p>All non-compliances should be recorded and discussed at weekly site meetings and timeous remedial actions taken</p> <p>All guilty parties that are in contravention of the provisions set out for managing waste should be given a penalty and according to the severity of the impact appropriate steps taken</p>	

## SECTION B: HEALTH AND SAFETY

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION MEASURES</b>	
Health and Safety Plan	The Proponent should compile a Health and Safety Plan that should address as a minimum the mitigation measures included below, as well as the Regulations Pertaining to Health and Safety at the Workplace.
Road Safety	<p>Demarcate roads clearly</p> <p>Off-road driving should not be allowed unless tracks have been approved by the affected landowner/occupant/ person or entity responsible for the road</p> <p>All vehicles that transport materials to and from the site must be roadworthy</p> <p>Drivers that transport materials should have a valid driver's license and should adhere to all traffic rules.</p> <p>Loads upon vehicles should be properly secured to avoid items falling off the vehicle</p> <p>Maintain national speed limits at all times (120km per hour on national roads, 80km/hour on district roads), and 30km/hour on the internal tracks.</p>
Safety around drill holes and general work areas	<p>Drill holes should be left open for an absolute minimum time.</p> <p>Demarcate the following areas with danger tape:</p> <ul style="list-style-type: none"> <li>○ All drilling works</li> <li>○ Temporary waste stockpiles</li> </ul> <p>Provide additional warning signage in areas of movement and in "no personnel" areas where workers are not active</p> <p>Demarcate general work area (that is the area adjacent to the drill site and associated activities) with a suitable and visible marker</p> <p>All exploration materials and equipment are to be stored only within demarcated work areas in the smallest space necessary on site</p> <p>Only exploration personnel will be allowed within these work areas</p> <p>Fire extinguishers should always be available at the drill sites</p> <p>Comply with all mitigation measures laid out in <b>Section A</b> (Waste Management mitigation details)</p>
Ablutions	<p>Separate ablutions (toilet and shower) should be available for men and women if required</p> <p>Portable toilets (i.e. easily transportable camp toilets) should be available at every exploration site:</p> <ul style="list-style-type: none"> <li>○ Sewage waste needs to be removed on a regular basis to Divundu or Rundu's sewage disposal site. Alternatively, it is to be pumped into sealable containers and store until it can be removed to such sites</li> <li>○ Workers responsible for cleaning the toilets should be provided with latex gloves and masks and any other related PPE.</li> </ul>
Open fires	<p>No open fires may be made anywhere on the drill sites</p> <p>No wood may be collected within or near the project area except with</p>

ASPECT	MITIGATION MEASURE
	the required permit.
General	<p>Dust protection masks should be provided to workers when working at the drill rigs or in other dusty environments</p> <p>No person should be allowed to smoke close at the drill site</p> <p>No workers should be allowed to drink alcohol or be under the influence of recreational drugs during work hours</p> <p>No workers should be allowed on site if under the influence of alcohol or recreational drugs</p> <p>Proper safety gear to be supplied to all personnel according to each one's level of risk exposure</p> <p>Provide at least 5 litres of fresh potable water to each personnel member per day during work hours to prevent dehydration and promote productivity</p> <p>Provide adequate shading accessories to personnel to prevent sunstroke and excessive sunburn</p> <p>Frequent, short breaks in between work hours should be implemented</p>
<b>MONITORING REQUIREMENTS</b>	
<p>Non-compliances should be recorded and discussed at the weekly meetings with the exploration manager and coordinator and appropriate steps taken to rectify such recorded non-compliances</p>	

**SECTION C: DUST AND NOISE**

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Dust	<p>Appropriately rated and fitted dust masks should be given to personnel working in areas of dust exposure</p> <p>Grey water should be used for dust suppression on a constant basis if available and as required</p> <p>Maintain speed limited as specified under Section B.</p>
Noise	<p>Work hours should be restricted to between dawn and dusk where exploration involving the use of heavy equipment, power tools, and the movement of heavy vehicles is within 500 m from sensitive receptors. In the event that this is not possible, the affected community need to be consulted well in advance to agree on a mutually acceptable solution</p>
<b>SPECIFIC MITIGATION DETAILS</b>	
Noise and dust	<p>No field exploration work may be conducted on Sundays.</p> <p>Field exploration activities may only be conducted on public holidays with the permission of the relevant affected community.</p> <p>The movement of vehicles are restricted to working hours or times agreed upon between the team and the land owners and or affected community.</p> <p>Maintain speed limits as specified under Section B.</p>
<b>MONITORING REQUIREMENTS</b>	
<p>When complaints are received from tourism facilities or affected communities regarding noise and dust nuisance, abatement in the form of water spraying and restricted work hours should be implemented. Communication with those that complained should be continued to determine whether the problem has been resolved</p>	

**SECTION D: ENVIRONMENTAL TRAINING AND AWARENESS**

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Environmental Induction (Training)	<p>All exploration personnel are to undergo environmental induction (training) for both exploration stages, which should include as a minimum the following:</p> <ul style="list-style-type: none"> <li>Detailed review of the current EMP to familiarize personnel with requirements</li> <li>Explanation of the importance of complying with the EMP</li> <li>Discussion of the potential environmental impacts of the exploration activities</li> <li>Employees' roles and responsibilities, including emergency preparedness</li> <li>Explanation of the mitigation measures that must be implemented when particular work groups carry out their respective activities</li> <li>Explanation of the specific mitigation measures within this EMP especially unfamiliar provisions</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
Environmental Manager to request attendance registers be completed by all personnel attending induction training sessions.	

## SECTION E: ENVIRONMENTAL CONSERVATION

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Conservation of vegetation	<p>The layout of the drill grid once developed should consider and avoid sensitive vegetation or mature trees on the project site. The proponent should compile a Vegetation Management Plan which should include the following as a minimum:</p> <ul style="list-style-type: none"> <li>○ No trees occurring in this environment may be damaged or removed for any purpose</li> <li>○ Protected trees need to be marked and their location recorded on a map</li> </ul>
Conservation of fauna (includes livestock)	<p>Movements of drilling staff are restricted to the drill sites and work areas only No hunting, trapping, fishing, setting of snares, or any other disturbance of any fauna species allowed</p>
Drill site locations	<p>Suitable locations should be identified with the assistance of the EC and various specialists and the following should be considered in selecting these sites:</p> <ul style="list-style-type: none"> <li>○ First choice should be degraded land</li> <li>○ Avoid sensitive areas (e.g. protected archaeological sites or drainage lines)</li> </ul> <p>Drill sites will be kept to a minimum size (the required footprint only) and the working area will be clearly demarcated</p>
Track creation	<p>Do not remove trees for the purposes of track creation Access tracks and roads should not be wider than the normal width to accommodate an exploration truck No tracks must be created unless unavoidable</p>
Rehabilitation	<p>During the initial prospecting phase, only limited surface rock and soil sampling will take place and it is unlikely that any scars be left by this activity. Remove all waste, defunct samples, and any other remains from the site Remove all sample bags, plastic waste, survey pegs, materials used for sump creation etc. from site at completion of sampling schedule Site should be rehabilitated to as close as possible to its original condition Re-contour and rip the drill site before the site is finally decommissioned Fill holes, rip up, rake track, and spread stockpiled topsoil back over the entire new tracks made, to allow re-vegetation Make sure that the environmental coordinator has a site inspection to check rehabilitation efforts of each drill sites</p>
<b>SPECIFIC MITIGATION MEASURES</b>	
Protection of crops	<p>Buffer zones of at least 200m must be established around crops. In the event that this is not possible, the community need to be consulted well in advance to agree on mutually acceptable solution (which may</p>



ASPECT	MITIGATION MEASURE
	include compensation)
Soil Preservation	Existing tracts to be used and new track usage to be limited. No continual re-entering of new tracks by vehicles after rehabilitation. Rehabilitation monitoring to be conducted on foot.
Protection of groundwater	<p>Where the water table is penetrated by drilling and the water flows out onto the surface, a furrow needs to be dug that diverts the water to vegetation.</p> <p>All boreholes should be capped and labelled. In the instances where water is encountered the water should be sampled and tested and the local farm owner be made aware thereof.</p> <p>Water saving measures should be applicable at all times. No taps or pipes left to run, leakings to be detected immediately. Vehicles only to be washed with buckets, not running water.</p>
<b>MONITORING REQUIREMENTS</b>	
<p>Check for traps along fences and during a general drive-through weekly</p> <p>Monitor drill areas and all access tracks and roads. Record all negligent plant destruction sightings, and apply the penalty system to all guilty parties</p> <p>If protected species are removed (after the proper permits have been acquired), negotiations with the land owner and or affected community about the replanting of this specie at a specific location, e.g. their homestead, should be undertaken</p> <p>Constant monitoring and record keeping of progress must be made until all rehabilitation is done, approved and signed off by the Environmental Coordinator at the decommissioning of exploration</p> <p>Photo logs to be kept of are prior to new track begin created and continued throughout the monitoring phase off rehabilitation.</p> <p>Take borehole water level at the start of exploration and at the end of exploration. Keep the records.</p> <p>Monitor the use of water and keep records of daily requirements.</p>	

**SECTION F: EMPLOYMENT/RECRUITMENT**

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Legislation	Adhere to the legal provisions in the Labour Act for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.) in the Contract.
Recruitment	<p>Where and if applicable A formal recruitment process including the following provisions as a minimum should be adhered to:</p> <ul style="list-style-type: none"> <li>○ The authority (Regional Council) and Traditional Authority (for each respective area) should assist with the recruitment process</li> <li>○ Ensure that all are aware of recommended recruitment procedures and discourage any recruitment of labour outside the agreed upon process</li> <li>○ Preference should be given in terms of recruitment of sub-contractors and individual labourers to those from the project</li> <li>○ Clearly explain to all job-seekers the terms and conditions of their respective employment contract (e.g. period of employment etc) and make use of interpreters when necessary</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
<p>The Exploration Manager should monitor the effective implementation of the recruitment process Work should only continue until all requirements are met, with the submission of records</p>	

## SECTION G: STAKEHOLDER ENGAGEMENT

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Communication plan	<p>The proponent should draft a Communication Plan, which should outline as a minimum the following:</p> <ul style="list-style-type: none"> <li>○ How Affected parties, who require ongoing communication for the duration of the exploration period, will be identified and recorded and who will manage and update these records (i.e. use the distribution list list for this study as a basis);</li> <li>○ How these parties will be consulted on an ongoing basis</li> <li>○ Make provision for grievance mechanisms – i.e. how concerns can/ will be lodged/ recorded and how feedback will be delivered as well as further steps of arbitration in the event feedback is deemed unsatisfactory.</li> </ul>
<b>SITE SPECIFIC MITIGATION DETAILS</b>	
Access Agreements	<p>An access agreement/ broad based community consent need to be made with affected communities prior to any exploration taking place at drilling sites</p> <p>Broad based community consent and/or access agreements should be in a format which is culturally acceptable for the area</p> <p>The owner of the land and of affected community must be given an opportunity to negotiate the terms of the agreement</p> <p>The following needs to be included in the agreement:</p> <p>Legally required compensation</p> <p>Operating hours</p> <p>A commitment from the prospector to rehabilitate damage done and remove all waste from site</p> <p>Agreements on how access will be gained and managed e.g. two lock system</p> <p>That no gates may be left opened or fences damaged</p> <p>A commitment that this EMP will be adhered to</p> <p>Liability insurance for fire damage</p> <p>As appendices: A copy of the EMP and a short explanation of the Environmental Assessment that was conducted</p> <p>This also applies to the adjacent farm owners land where vehicular access needs to be obtained.</p>
Safety and Security	<p>Land owners and or affected communities need to be given a list containing names and photographs of the exploration team for identification purposes prior to the start of any exploration</p> <p>Each member of the team needs to wear an ID tag (with a photo on) at all times when on site as well as a team uniform</p> <p>Bright, reflective jackets need to be worn by each person on the drill sites</p> <p>All exploration vehicles must be marked for easy identification</p> <p>At the project camp the following needs to be adhered to:</p> <ul style="list-style-type: none"> <li>○ No visitors allowed to visit staff</li> <li>○ No individual social interaction with local workers to be allowed</li> </ul>

ASPECT	MITIGATION MEASURE
	<p>except for corporate social gatherings or unless authorized by Nanmar Investments</p> <ul style="list-style-type: none"> <li>○ A perimeter around the camp must be established within which the team may reside and are restricted to</li> </ul>
<b>MONITORING REQUIREMENTS</b>	
<p>Ensure that the necessary contracts are signed and in place</p> <p>Keep constant updated records of all concerns and issues logged during the course of the exploration programme</p> <p>Monitor the speed and effectiveness of remedial actions taken upon concerns and issues raised by the public during exploration and remedy all timeously</p>	

## SECTION H: SOCIAL AND CULTURAL HERITAGE

ASPECT	MITIGATION MEASURE
<b>GENERIC MITIGATION DETAILS</b>	
Archaeology	<p>Should a heritage site or archaeological site be uncovered or discovered during either exploration phases of the project, a "chance find" procedure should be applied in the order they appear below:</p> <ul style="list-style-type: none"> <li>○ If operating machinery or equipment, stop work</li> <li>○ Demarcate the site with danger tape</li> <li>○ Determine GPS position if possible</li> <li>○ Report findings to foreman</li> <li>○ Report findings, site location and actions taken to superintendent</li> <li>○ Cease any works in immediate vicinity</li> <li>○ Visit the site and consult with any potentially affected community to determine whether work can proceed without damage to findings.</li> <li>○ Determine and demarcate the exclusion boundary</li> <li>○ Site location and details to be added to the project's Geographic Information System (GIS) for field confirmation by an archaeologist</li> <li>○ Inspect site and confirm addition to project GIS</li> <li>○ Advise the National Heritage Council (NHC) and request written permission to remove findings from work area.</li> <li>○ Recover, package and label findings for transfer to the National Museum</li> </ul> <p>Should human remains be found, the following actions will be required:</p> <ul style="list-style-type: none"> <li>○ Apply the chance find procedure as described above</li> <li>○ Schedule a field inspection with an archaeologist to confirm that remains are human.</li> <li>○ Advise and liaise with the NHC and Police</li> <li>○ Remains will be recovered and removed to either the National Museum or the National Forensic Laboratory.</li> </ul> <p>Contact person at NHC: Rev. Solomon April; Tel: (061) 244 375/ 385/594</p>
<b>SPECIFIC MITIGATION DETAILS</b>	
Archaeology	Obtain inputs from an archaeologist to identify potential archaeological sites in the area and to determine further mitigation where necessary.
<b>MONITORING REQUIREMENTS</b>	
<p>Check that the archaeologist has given a written statement about the location of the known archaeological sites in the area vs the location of the drilling area.</p> <p>Make sure no archaeological site is disturbed whilst excavation and recovery takes place</p> <p>Make sure everything of importance, as identified by a appropriate specialist, is removed from site and declared safe by an archaeologist before exploration can continue on the site</p> <p>Daily monitoring of fences and gates which have been entered through to ensure no unplanned movement of livestock or animals occur</p>	

### 3.4 Rehabilitation and Decommissioning

This phase contains elements that should be considered when exploration activities have been completed by the holder of the EPL rights. These management requirements are important to ensure that rehabilitation of the environment is optimized. It is important to note that ongoing rehabilitation initiatives have been captured and detailed in the various themes (as set out above) of the exploration phase.

**Table 4: Management requirements for Rehabilitation and Decommissioning**

ASPECT	MANAGEMENT REQUIREMENT
EMP IMPLEMENTATION RECORD	<p>Filing and dating of all reports (including photographic documentation of successful rehabilitation initiatives)</p> <p>A final site inspection to be conducted and documented 6 months after all activities associated with the exploration initiative has been completed</p>
FINANCIAL PROVISIONS	<p>Allocate appropriate budgetary allowances for all possible rehabilitation activities and initiatives (including such requirements for a communication strategy)</p>
LANDOWNER AND I&AP	<p>Develop a communication strategy which will clearly indicate the future of the project (i.e. will further drilling activities be conducted or Application for a Mining Rights Licence be made)</p>

# Appendix A

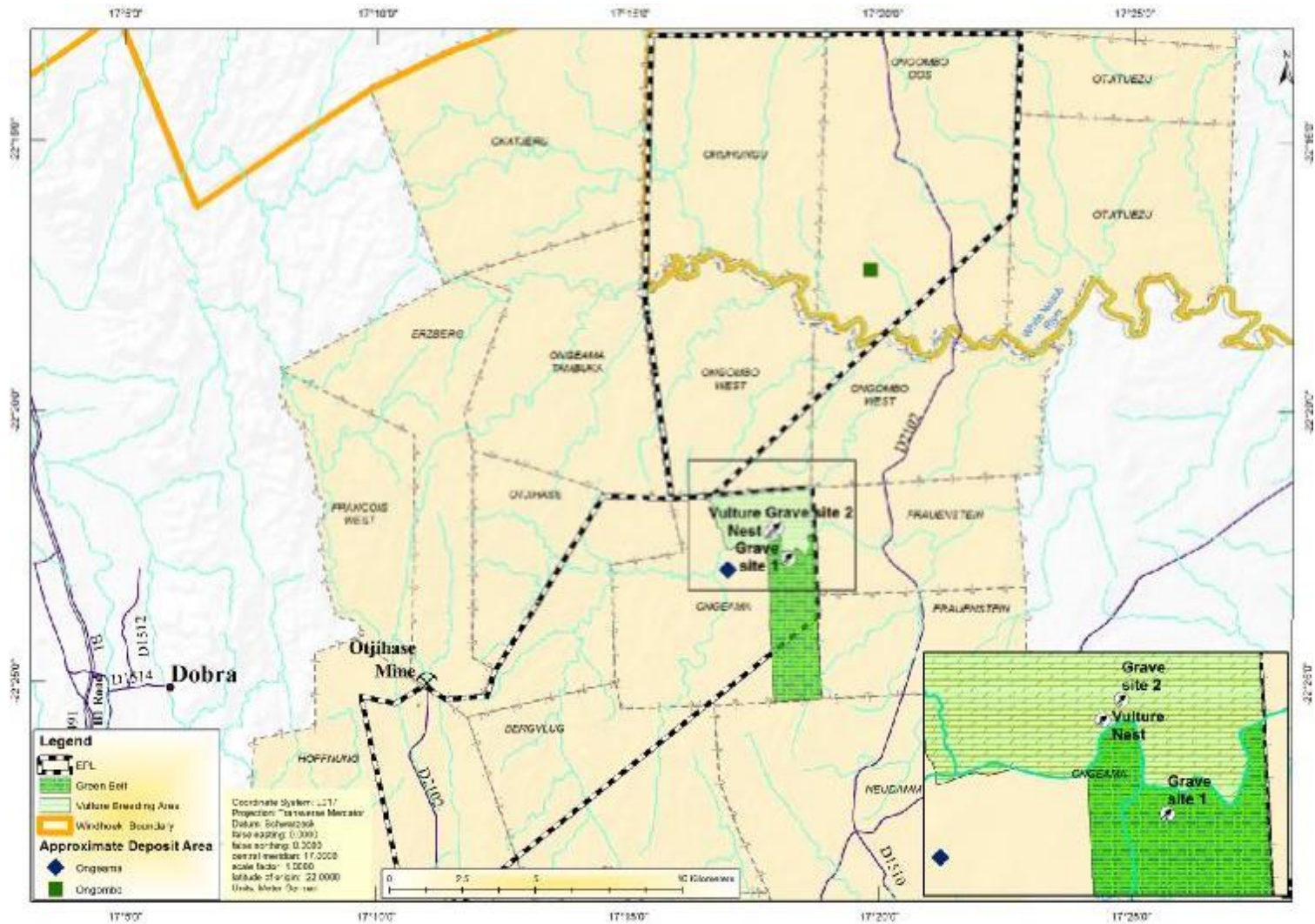


Figure 1: Map indicating vulture breeding sites and green belt in relation to the EPL boundaries (ED 2015)