



Submitted to: Votorantim Metals Namibia
(Pty) Ltd.
Attention: Mr Marcos da Silva
9B South Port Office Park,
Hosea Kutako Avenue
P O Box 97957, Maerua Mall

REPORT:

EXPLORATION ACTIVITIES ON EPL 6927-

COMPLIANCE REPORT

PROJECT NUMBER: ECC-88-407-REP-02-D

REPORT VERSION: REV 01

DATE: 7 JULY 2022

TITLE AND APPROVAL PAGE

Project Name: Exploration Activities on EPL 6927– Compliance Report
Client Company Name: Votorantim Metals Namibia (Pty) Ltd.
Client Name: Mr Marcos da Silva
Ministry Reference: APP- 003821
Authors: Environmental Compliance Consultancy
Status of Report: Draft for client review 01
Project Number: ECC-88-407-REP-02-D
Date of issue: 7 July 2022
Review Period: NA

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

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Environmental Compliance Consultancy (ECC) (Reg. No. CC 2013/11401) has prepared this scoping report and the preliminary EMP on behalf of the Proponent. This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the Proponent and has no vested or financial interest in the Project, except for fair remuneration for professional fees rendered based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of the Proponent. No member or employee of ECC has, or has had, any shareholding in the Proponents company or project. Any personal views or opinions expressed by the writer may not necessarily reflect the views or opinions of Environmental Compliance Consultancy or its client.

Please note at ECC we care about lessening our footprint on the environment; therefore, we encourage that all documents are printed double sided.

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TERMS AND ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
AMT	Audio MagnetoTelluric
DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
EIA	environmental impact assessment
EMP	environmental management plan
IP	Induced polarization
EPL	Exclusive Prospecting Licence
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
RAB	Rotary Air Blast

1 INTRODUCTION

1.1 COMPANY BACKGROUND

Environmental Compliance Consultancy (ECC) has been retained by Votorantim Metals Namibia (Pty) referred to hereinafter as the Proponent. The Proponent currently holds a valid environmental clearance certificate for exploration activities on EPL 6927, for which a renewal is being applied. As part of this application, an environmental compliance audit has been undertaken to determine the status of compliance with the environmental management plan.

The project is located in the Otjozondjupa Region. The licence area is located approximately 25-30 km from Otavi and 12.4 km from Kombat see Figure 1.

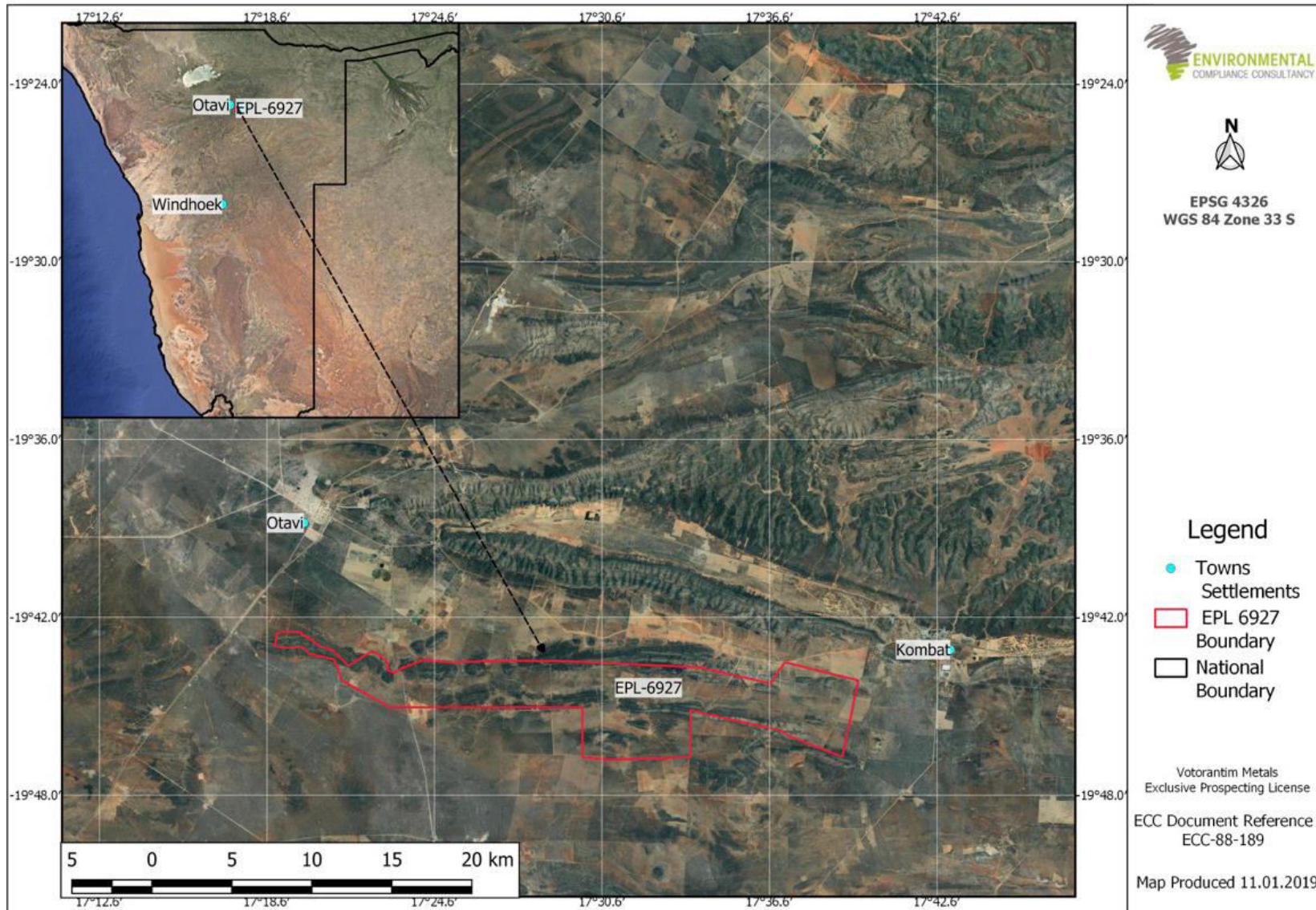


Figure 1 - Project location

1.2 THE PROPONENT OF THE PROPOSED PROJECT

Votorantim Metals Namibia (Pty) Ltd is the Proponent for the proposed project. The Proponent has a head office in Namibia’s capital, Windhoek, 9B South Port, Hosea Kutako Avenue and the Proponents’ details are provided in Table 1.

Table 1 - Proponents details

Company Representative:	Contact Details:
Mr E Freyer Mrs Y Hass	Votorantim Metals Namibia (Pty) Ltd: PO Box 97957, Maerua Mall Windhoek efreyer@iway.com ext.yvonneh@nexaresources.com +264 (61) 221 016

1.3 ENVIRONMENTAL ASSESSMENT PRACTITIONER

Environmental Compliance Consultancy (ECC) (Reg. No. CC 2013/11401) has prepared this renewal report on behalf of the Proponent. This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the proponent and has no vested or financial interest in the project, except for fair remuneration for professional fees rendered based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of Votorantim Metals Namibia (Pty) Ltd. No member or employee of ECC has, or has had, any shareholding Votorantim Metals Namibia (Pty) Ltd.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy
 PO Box 91193, Klein Windhoek, Namibia
 Tel: +264 81 669 7608
 Email: info@eccenvironmental.com

1.4 PURPOSE OF REPORT

The purpose of this report is to document the findings of an environmental compliance audit, which accompanies the renewal application for the environmental clearance certificate for EPL 6927.

The approved EMP for the existing environmental clearance certificate is audited to monitor the proceeds of the project and ensure that all measures stipulated in the document are met and effectively adhered to, as required by the Department of Environmental Affairs (DEA). In an event where the project activities are altered, the EMP is required to be revised and amended accordingly.

As per the Environmental Management Act, No. 7 of 2007 and its EIA Regulations of 2012, exploration activities on EPL 6927 cannot be undertaken without a valid environmental clearance certificate. The exploration activities at EPL 6927 proposes to assess the viability of base and rare and precious minerals, namely copper that can be found in the EPL 6927 area. The proposed methods of exploration have minimal impacts, as they are done on a small scale and rehabilitation of the natural vegetation will be done as per the approved EMP.

2 BACKGROUND TO EPL 6927

The Proponent carries out low-impact exploration activities on EPL 6927 for base and rare metals, industrial minerals and precious metals in the Otjozondjupa Region. The Proponent wishes to continue with exploration activities on Exclusive Prospecting Licence (EPL) 6927.

2.1 RENEWAL ACTIVITIES

The proposed project is for the exploration of base, rare and precious metals and industrial minerals. As part of the proposed exploration project, the following activities are envisaged, which shall be further defined as the exploration program is refined:

- Arial or remote sensing
- Electromagnetic surveys
- Drilling
- Mineral sampling

3 ENVIRONMENTAL COMPLIANCE AUDIT

3.1 SITE INSPECTION

3.1.1. Bi-annual monitoring

An environmental report is submitted to the Ministry of Environment, Forestry and Tourism biannually reporting on periods from January to June and July to December. These reports report on compliance with regards to the activities taking place on-site, roads or tracks made or used, accommodation structures and infrastructure erected, any rehabilitation done, and any incidents of conflict reported.

3.1.2 Activities for the monitoring period

From July to December 2019 some 13 lines (15.6 km) were cleared for AMT and IP surveys on farm Neuwerk. The 1 m wide lines were cut for access on foot to lay out geophysical survey cables. Some 1136 small pits were dug for electrodes and closed after the survey.

From January to June 2020 the Proponent surveyed 33 lines (38.2 km) on the farms Neuwerk, Hartebeestpoort, Askevold and Ondjondjo using the AMT and IP survey methods. The 1 m wide lines were cut for access on foot to lay out geophysical survey cables. Some 2445 small pits were dug for electrodes and closed after the survey. Four diamond drill holes were drilled with a total meterage of 1163.19m. Another shallow (max. 20m deep) 88 RAB (rotary air blast) holes amounting to a total meterage of 696m were drilled.

From July to December 2020 the Proponent surveyed 25 lines (38.4 km) on the farms Neuwerk, Hartebeestpoort, Askevold and Ondjondjo, using the AMT and IP survey methods. The 1 m wide lines were cut for access on foot to lay out geophysical survey cables. Some 2379 small pits were dug for electrodes and closed after the survey. Some 908 soil sampling holes were dug, each measuring 20 cm by 20 cm and 20 cm deep, which were also closed after sampling. Eleven diamond drill holes were drilled with a total meterage of 4449.43 m and a max. depth of 566.81m between 2 July 2020 and 16 December 2020.

From January to June 2021 the Proponent cleared and surveyed 33 lines (34.8 km) on the farms Askevold, Naueis and Altona using the AMT survey method. Access lines were 1 m wide and were cut for access and for laying out survey cables. Some 4723 small pits were dug for electrodes and closed after the AMT and IP surveys. AMT and IP surveys along 29 lines were completed. Another 0.48 ha of bush-encroached land was cleared for drill access tracks and sites. On 18 June 2021 the Proponent began with diamond drilling of one hole with an end-of-hole depth of 140.66 m.

From June to December 2021 the Proponent cleared 1.48 ha of bush encroached areas for drill access tracks and drill-sites. While 3.1km (0.78 ha) areas) were cleared for drill access tracks, 0.7 ha were cleared for 14 drill-sites, allowing grass to re-grow naturally during the 2021-2022 rainy season.

The main access road to Farm Neuwerk was gravelled as it had been severely washed out due to heavy rains. On this farm 0.7 Ha was cleared to make space for fourteen drill sites and tracks. These areas and tracks are now also available for productive use by the landowner.

Fourteen sumps with an area of 1.125 m³ were dug for recycling water during drilling and were closed after drilling was completed.



Figure 2 - A drill rig



Figure 3 - A plastic linear - preparing sump



Figure 4 - Drill rig and sumps



Figure 5 - Drill crew campsite

3.2 ANNUAL COMPLIANCE AUDIT

Furthermore, the approved EMP covers all adverse environmental impacts, including any additional potential impacts that may result from the exploration activities at EPL 6927. The

EMP provides the technical details for each mitigation, monitoring and institutional measure, including the impact(s) to which it relates and the conditions when required, together with designs, equipment descriptions and operating procedures as granted.

3.3 COMPLIANCE AUDIT FINDINGS

This section outlines the findings of the environmental audit completed for the project. It addresses obligations in terms of the key Acts that govern the activities on site, the commitments made in the EMP, and present the findings and recommended corrective actions where applicable (Table 2).

The EMP:

- Identifies all mineral exploration activities that could cause environmental damage (risks and potential impacts) and provides a summary of actions required;
- Identifies institutions responsible for ensuring compliance with the EMP and provides their contact information;
- Provides standard procedures to avoid, minimise and mitigate the identified negative environmental impacts and to enhance the positive impact of the proposed activities on the environment;
- Provides for site and exploration rules and actions required;
- Forms a written record of procedures, responsibilities, requirements and rules for contractor/s, their staff and any other person who must comply with the EMP;
- Ensure zero pollution incidents; minimal vegetation clearing and earthworks, protect local flora, fauna, and water resources; and use water and other natural resources effectively and efficiently.
- Provides a monitoring and auditing programme to track and record compliance and identify and respond to any potential or actual negative environmental impacts, and
- Provides a monitoring programme to record any mitigation measures that are implemented.
- Ensure that an annual environmental audit is carried out by either MME or MEFT.
- Once exploration has ceased, any impacts shall be rehabilitated.

3.4 ISSUES OF NON-COMPLIANCE

From July to December 2021 there were various complaints from landowners of litter and other types of pollution by contractors, movement of vehicles and equipment on access roads and tracks, various activities and actions by contractors and the proponent's staff and breach of contracts and agreements.

The proponent took various measures to resolve these issues such as verbal agreements after discussions, instructions to company staff to avoid conflicts and the proponent rectified its mistakes and undertook measures to avoid future wrongdoing.

Table 2 - Exploration EMP Audit

Activity	Potential Impacts	Management/Mitigation Measures	Compliance	Comments
Use of vehicles and equipment	- Hygiene and Safety	- Amenities (e.g., portable toilets) shall be provided and set up in a suitable location (if required).	- Compliant	- The proponent will continue to ensure mitigation measures are in place as per the EMP.
	- Emissions	- All vehicles and machinery/ equipment to be shut down or throttled back between periods of use	- Compliant	- The proponent will continue to ensure mitigation measures are in place as per the EMP.
	- The potential loss of oil and fuel causing ground contamination	- Refueling shall be undertaken in a designated area - All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil	- Compliant	- The proponent will continue to ensure mitigation measures are in place as per the EMP.
	- Water contamination	- In the event of pollution, polluted soils must be collected and disposed of at an approved site - Water during drilling should be retained in a lined pond to prevent pollution, and	- Compliant	- The proponent will continue to ensure mitigation measures are in place as per the EMP.

		<ul style="list-style-type: none"> - A 'good housekeeping' policy shall be adopted across the construction and maintenance working area 		
	<ul style="list-style-type: none"> - Dust generation 	<ul style="list-style-type: none"> - Use existing access roads and tracks where possible - Apply dust suppression methods such as water spraying during drilling operations - Restricted speeds (<30km/h), and - Specific activities that may generate dust and impact on residents shall be avoided during high wind events 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.
	<ul style="list-style-type: none"> - Noise generation 	<ul style="list-style-type: none"> - Noise shall be minimised as much as possible during the exploration works - No hammering of drill rods with steel hammers in proximity to nearby farm houses - Drill equipment shall be suitably positioned to ensure that noisy equipment is away from human receptors - Noise suppression measures shall be applied if drilling occurs in locations that may affect residents and during evening periods 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.

		<ul style="list-style-type: none"> Residents shall be provided at least two weeks' notice of drilling operations within 1km of their property, and Continual engagement with residents shall be undertaken with the proponent. 		
General exploration activities	<ul style="list-style-type: none"> Loss of access or access affected to the farm and farm areas, and Farm operations 	<ul style="list-style-type: none"> Access to farms and all farm areas shall always be made available, and Cattle water holes and feeding areas to remain unaffected. 	- Compliant	<ul style="list-style-type: none"> The proponent will continue to ensure mitigation measures are in place as per the EMP.
Vegetation clearance	<ul style="list-style-type: none"> Alien species 	<ul style="list-style-type: none"> All project equipment arriving on site from an area outside of the project or coming from an area of known weed infestations (not present on the project site) should have an internal weed and seed inspection completed prior to equipment being used Ensure the potential introduction and spread of alien plants is prevented, and Ensure the correct removal of alien invasive vegetation and Prevent the establishment and spread of alien invasive plants. 	- Compliant	<ul style="list-style-type: none"> The proponent will continue to ensure mitigation measures are in place as per the EMP.
	<ul style="list-style-type: none"> Dust generation 	<ul style="list-style-type: none"> Apply speed restrictions, and Avoid off road driving. 	- Compliant	<ul style="list-style-type: none"> The proponent will continue to ensure mitigation

				measures are in place as per the EMP.
	<ul style="list-style-type: none"> - Reduced soil quality 	<ul style="list-style-type: none"> - Use existing tracks where possible - Refueling to occur in designated areas with drip trays, and - Avoid natural drainage lines for exploration activities. 	- Compliant	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.
	<ul style="list-style-type: none"> - Injure or kill animals 	<ul style="list-style-type: none"> - No driving off designated access routes (into the bush) / off-road driving - No snares or catching of animals, no keeping or housing of pets for food, and - No animals or birds may be collected, caught, consumed or removed from site by the Contractor or personnel on site. 	- Compliant	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.
	<ul style="list-style-type: none"> - Removal of vegetation – loss of flora and fauna, protected/important species 	<ul style="list-style-type: none"> - Use existing tracks where possible - Route new tracks around established and protected trees, and clumps of vegetation - Identify rare, endangered, threatened and protected species. - Demarcate and avoid cutting down, and clearly highlight to construction workers so that they are avoided, and - Avoid natural drainage lines. 	- Compliant	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.
Site and ground	<ul style="list-style-type: none"> - Heritage remains 	Discovery of unearthed archaeological remains to be uncovered, the following	- Compliant	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation

<p>preparation – creation of access tracks and areas for setting up drill rigs</p>		<p>measures (chance find procedure) shall be applied:</p> <ul style="list-style-type: none"> – Works to cease, area to be demarcated with appropriate tape by the site supervisor, and – The Exploration Manager to be informed – Exploration Manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and – Inform the Environmental Consultant with the GPS position, if possible. – If works cannot proceed without damage to findings, the Exploration Manager to inform the Environmental Consultant for the archaeologist inspection and advice – Environment Compliance Consultancy's Archaeologist will evaluate the significance of the remains and identify appropriate action, for example, record and remove; relocate or leave in situ (depending on the nature and value of the remains) – Inform the police if the remains are human, and 		<p>measures are in place as per the EMP.</p>
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		<ul style="list-style-type: none"> - Obtain appropriate clearance or approval from the competent authority, if required, and recover and remove the remains to the National Museum or National Forensic Laboratory as directed. 		
Fuel handling and storage	<ul style="list-style-type: none"> - Loss of containment leading to ground or groundwater contamination 	<p>Safe Delivery and handling:</p> <ul style="list-style-type: none"> - Training employees and Toolbox Talks - Good housekeeping across site - Fuel is handled with care - Spill kits to be available for use during refueling, fuel delivery or use. - Absorption material should be available. Where saw dust is used it should be cleaned up immediately and not left for long periods - Any spill is to be reported to the Exploration Manager once containment has been achieved. - Plant and equipment to be well maintained and serviced regularly, and - In the field, use of hydrocarbons under 200 litres can be used for mobile refueling or servicing. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.

		<ul style="list-style-type: none"> - Fuel spills of greater than 200lts are to be reported to the MME in terms of the Petroleum Products and Energy Act, 1990 <p>Storage:</p> <ul style="list-style-type: none"> - All tanks to be stored on a non-porous floor and bunded area - Bund to be capable of storing at least 110% of the volume of the tank - All containers to be suitable for use and not damaged - Tanks are locked at all times, and - Spill kits available at in suitable locations. <p>Refueling:</p> <ul style="list-style-type: none"> - Drip trays to be used during refueling of vehicles and on a permeable flat surface where possible, and - Funnels should be available and used to avoid spillage during decanting 		
<p>Generation of waste</p>	<ul style="list-style-type: none"> - Nuisances (odours and visual) - Land use, and - Litter (nuisance and ecological risk). 	<ul style="list-style-type: none"> - Training and Toolbox Talks - Good housekeeping across site - All working areas shall apply good housekeeping - Implement the waste management hierarchy across site: Avoid, reuse, recycle, then disposal through burning or landfill 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.

		<ul style="list-style-type: none"> - Waste shall be collected and shall be removed on a regular basis to avoid pests and bad odours, and It is unlikely that hazardous material and wastes will be produced, however in the event that they do, they shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. - Hazardous and non-hazardous waste shall be stored separately at all times. 		
Resource use	<ul style="list-style-type: none"> - Inefficient use of water 	<ul style="list-style-type: none"> - Use water effectively and efficiently 	- Compliant	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.
Job creation	<ul style="list-style-type: none"> - Employment creation and skills development opportunities during the exploration phase. 	<ul style="list-style-type: none"> - Maximise local employment and local business opportunities - Enhance the use of local labour and local skills as far as reasonably possible - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	- Compliant	<ul style="list-style-type: none"> - The proponent will continue to ensure mitigation measures are in place as per the EMP.

4 REHABILITATION

The proponent ensured that all impacts caused by them during exploration activities were rehabilitated should no further use of the land be required. When selecting sites for access roads and drill sites, priority was given to areas with little vegetation cover, while sparing medium to large trees in order to minimize the amount of vegetation cleared. Where possible access roads were cleared manually to prevent the loss of fertile topsoil and generation of irregularities in terrain by machinery.

Any products that were added to water and disposed on land were biodegradable and non-contaminating. All return tanks were closed, and top grease material was collected and deposited at the Otavi waste disposal site.

The recovery of vegetation will occur naturally and gradually, through seeds that are in the soil and should begin to regrow during the rainy season. Access tracks will be maintained for future exploration activities.

Holes that were dug for electrodes and soil samples were closed after the AMT, IP and soil surveys.

1. Drill site: NANAND000016 from 16 June 2021 to 10 August 2021



Figure 6 - Drill rig at Drill-hole site: NANAND000016

BEFORE



AFTER



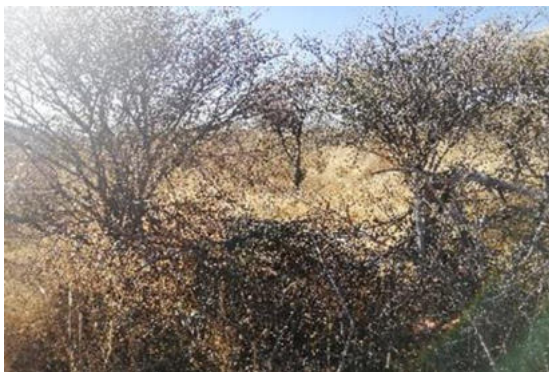
Figure 7 - Drill site before drilling and after rehabilitation at Drill-hole site: NANAND000016

2. Drill site: NANAND000017 from 17 August 2021 to 28 August 2021



Figure 8 - Drill rig, sumps and water tank at Drill-hole site: NANAND000017

BEFORE



AFTER



Figure 9 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000017

3. Drill site: NANAND000018 from 8 August 2021 to 10 September 2021



Figure 10 - Drill rig and sumps at Drill-hole site: NANAND000018

BEFORE

AFTER



Figure 11 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000018

4. Drill site: NANAND000019 from 29 August 2021 to 19 September 2021



Figure 12 - Drill rig, sumps and water tanks at Drill-hole site: NANAND000019

BEFORE

AFTER



Figure 13 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000019

5. Drill site: NANAND000020 from 11 September 2021 to 21 September 2021



Figure 14 - Drill rigs and sumps at Drill-hole site: NANAND000020

BEFORE



AFTER



Figure 15 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000020

6. Drill site: NANAND000021 from 23 September to 2 October 2021



Figure 16 - Drill rig and sumps at site: NANAND000021

BEFORE



AFTER



Figure 17 - Drill site before drilling and after rehabilitation after drilling and capped hole at Drill-hole site: NANAND000021

7. Drill site: NANAND000022 from 24 August 2021 to 14 September 2021



Figure 18 - Drill rig at site: NANAND000022

BEFORE



AFTER



Figure 19 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000022

8. Drill site NANAND000023 from 15 September 2021 to 27 September 2021



Figure 20 - Drill rig and sumps at site: NANAND000023
BEFORE

AFTER



Figure 21 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site:
 NANAND000023

9. Drill site NANAND000024 from 28 October 2021 to 30 October 2021



Figure 22 - Drill rig and sumps at site: NANAND000024

BEFORE

AFTER



Figure 23 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000024

10. Drill site NANAND000025 from 24 October 2021 to 27 October 2021



Figure 24 - Drill rig and diesel trailer from site: NANAND000025



Figure 25 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000025

11. Drill site NANAND000026 from 1 November 2021 to 14 November 2021



Figure 26 - Drill rig and sumps at site: NANAND000026



Figure 27 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000026

12. Drill site NANAND000027 from 1 November 2021 to 11 November 2021



Figure 28 - Drill rig and sumps



Figure 29 - Drill site before drilling and after rehabilitation after drilling at Drill-hole site: NANAND000027

13. Access Road Rehabilitation



Figure 30 - Access roads before rehabilitation



Figure 31 - Current rehabilitation of access roads

5 CONCLUSION AND RECOMMENDATIONS

All proposed activities shall be carried out in compliance with the relevant requirements and conditions of the granted licence in accordance with the approved EMP. It is recommended that the Proponent continue to adhere to all environmental legislation and company standards to ensure that best practical environmental protection continues as the project activities progress.

APPENDIX A: ENVIRONMENTAL MANAGEMENT PLAN

APPENDIX B - ENVIRONMENTAL CLEARANCE CERTIFICATE

ECC – ECC0020 Serial: 9zpsfd20



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE
ISSUED

In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

TO
Votorantim Metals Namibia (Pty) Ltd
P O Box 97957, Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY
**EXPLORATION ACTIVITIES ON EPL6927 FOR BASE AND RARE METALS,
INDUSTRIAL MINERALS, AND PRECIOUS METALS, OTJOZONDJUPA
REGION, NAMIBIA.**



[Signature]
DEPUTY ENVIRONMENTAL COMMISSIONER

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APPENDIX C – BI-ANNUAL REPORTS



ECC-88-189-REP-06-D

ENVIRONMENTAL MANAGEMENT PLAN

Exploration Activities on EPL 6927
For Base and Rare Metals, Industrial Minerals and
Precious Metals
Otjozondjupa Region

PREPARED FOR



MARCH 2019

TITLE AND APPROVAL PAGE

Project Name:	Exploration Activities on EPL 6927 For Base and Rare Metals, Industrial Minerals and Precious Metals, Otjozondjupa
Project Number:	ECC-88-189-REP-06-D
Client Name:	Votorantim Metals Namibia (Pty) Ltd
Ministry Reference:	NA
Status of Report:	Public Review
Date of issue:	March 2019
Review Period	26 th March – 2 nd April 2019

Environmental Compliance Consultancy Contact Details:

We welcome any enquiries regarding this document and its content please contact:

Stephan Bezuidenhout

Environmental Compliance Consultancy
Office: +264 81 669 7608
Email: stephan@eccenvironmental.com
www.eccenvironmental.com

Jessica Mooney

Environmental Compliance Consultancy
Office: +264 81 669 7608
Email: jessica@eccenvironmental.com
www.eccenvironmental.com

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DEFINITIONS AND ABBREVIATIONS

ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence

1. INTRODUCTION

1.1. BACKGROUND TO THE PROPOSED PROJECT

Environmental Compliance Consultancy (ECC) has been engaged by the proponent (Votorantim Metals Namibia (Pty) Ltd) to undertake an Environmental Impact Assessment (EIA) and an Environmental Management Plan (EMP) in terms of the Environmental Management Act, 2007 and its Regulations. An environmental clearance application will be submitted to the relevant competent authorities: the Ministry of Mines and Energy (MME) and the Ministry of Environment and Tourism (MET).

Nexa Resources is an investment company of the Votorantim portfolio; the company is listed on the New York Stock Exchange in the United States and the Toronto Stock Exchange in Canada. Votorantim undertakes mineral exploration in Namibia and proposes to undertake low impact exploration activities on EPL 6927 for base and rare metals, industrial minerals and precious metals in the Otjozondjupa Region.

The project is located in the Otjozondjupa region. The licence area is located approximately 25-30 km from Otavi and 12.4 km from Kombat see Figure 1.

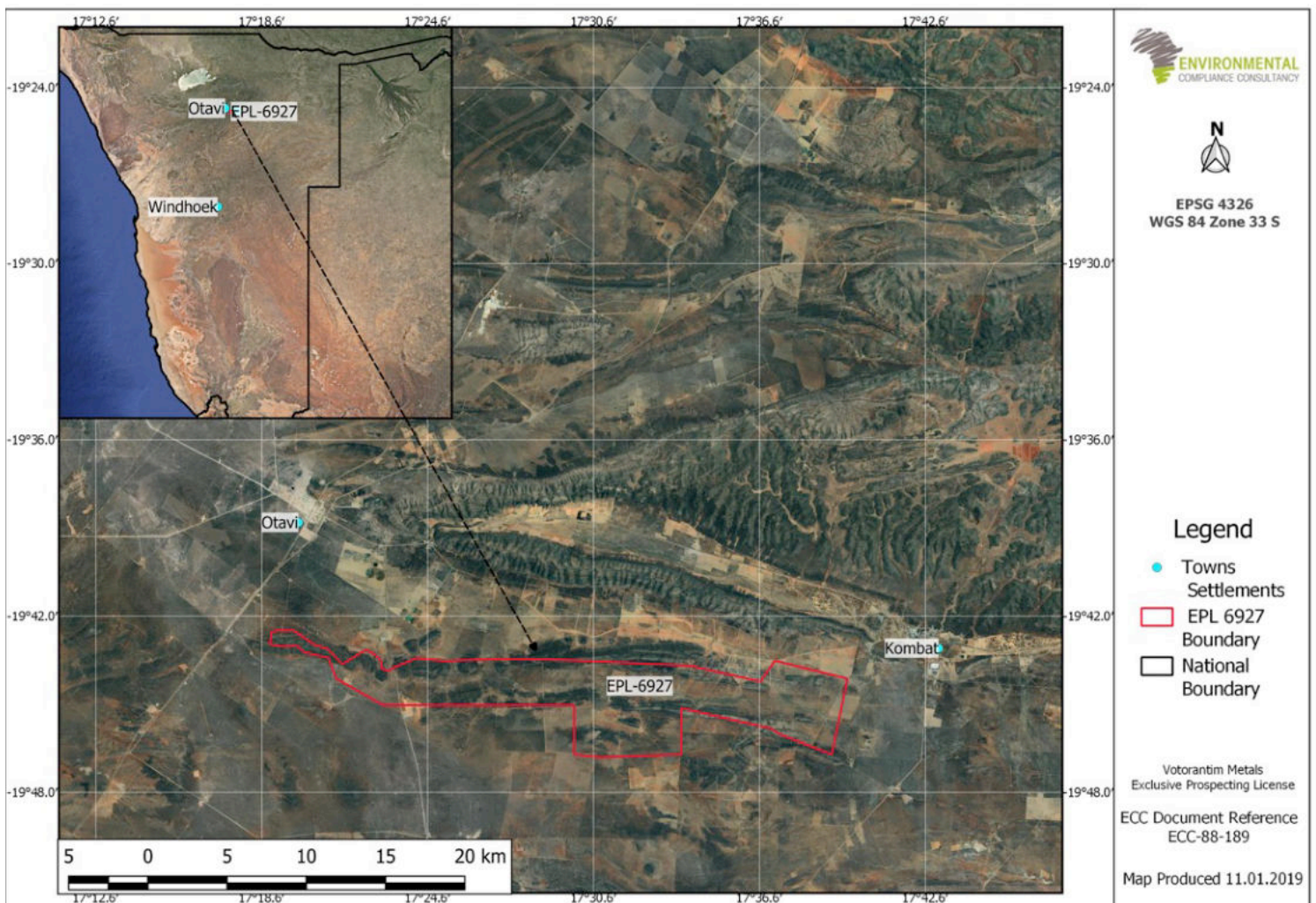


Figure 1 - Locality Map

1.1 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed project is considered as a Listed Activity as set out in terms of the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act, (EMA), 2007 (Act No. 7 of 2007) (referred to herein as the EIA Regulations).

As a listed activity an application for an environmental clearance certificate is required. An environmental scoping report and environmental management plan (EMP) is required as part of the environmental clearance certificate application, as well as to support the decision-making process. This report presents the EMP and has been undertaken in accordance with the requirements of the Environmental Management Act, 2007 and associated Regulations.

1.2 PURPOSE AND SCOPE OF THIS REPORT

This EMP provides a logical framework, mitigation measures and management strategies for the exploration activities associated with the proposed project, in this way ensuring that the potential environmental and social impacts are mitigated and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the EMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

This EMP forms an appendix to the environmental scoping report and has been based on the findings of the assessment; therefore, the environmental scoping report should be referred to for further information on the proposed project, assessment methodology, applicable legislation, and assessment findings.

This EMP is a live document and shall be reviewed at predetermined intervals, and/or updated when the scope of works alters, or when further data / information can be added. All personnel working on the project will be legally required to comply with the standards set out in this EMP.

The scope of this EMP includes all activities carried out during the exploration stage in search of base and rare metals, industrial minerals on EPL 6927.

1.3 MANAGEMENT OF THIS EMP

The proponent Votorantim Metals Namibia (Pty) Ltd will hold the environmental clearance certificate for the proposed project and shall be responsible for the implementation and management of this EMP. Prior to the exploration activities commencing, this EMP shall be reviewed, amended as required and approved ready for implementation. The implementation and management of this EMP and thus the monitoring of compliance shall be undertaken through daily duties and activities and monthly inspections.

This EMP shall be circulated to all contractors and shall be made available on the Environmental Compliance Consultancy's (ECC) website.

1.4 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the safety management plan to be developed by the proponent.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the environmental scoping report. Where the design or exploration methods alter, this EMP may require updating and potential further assessment undertaken.

1.5 ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy, a Namibian consultancy registration number 2013/11401, has prepared this document on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa in the public and private sector. The CVs of the authors of this report is contained in Appendix A. ECC is independent of the proponent and has no vested or financial interested in the proposed project expect for fair remuneration of professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or post to the following address:

Environmental Compliance Consultancy

PO BOX 91193

Klein Windhoek, Namibia

Tel: +264 81 669 7608

Email: info@eccenvironmental.com

1.6 STRUCTURE OF THIS EMP

Table 1 - ENVIRONMENTAL SCOPING REPORT SECTIONS

SECTION	TITLE	CONTENT
1	Introduction	This section introduces the EMP and provides background information on the proposed project, proponent and purpose of the report
2	Project Management	Sets the roles of the team responsible for implementing this EMP
3	Communication and Training	Methods for communication the EMP, records and complaints
4	Compliance and Enforcement	Sets out how compliance is monitored, reporting and actions to prevent reoccurrence
5	Environmental and Social Management	Register of commitments for the project
6	Implementation of the EMP	How to implement the EMP

2 PROJECT MANAGEMENT PERSONNEL

2.1 VOTORANTIM METALS NAMIBIA (PTY) LTD

The proponent shall provide a project team to oversee and undertake the preparation and exploration activities, which shall be composed of the proponent's personnel and contractors. A nominated role shall be identified to ensure the management and implementation of this EMP is throughout the duration of the project, which shall be supported by the proponent.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The proponent shall be responsible for:

- Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP
- Ensuring that all personnel are provided with sufficient training, supervision, and instruction to fulfil this requirement, and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed above. The key personnel and environmental responsibilities of each role through the project life are presented in TABLE 2.

TABLE 2 – ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES & DUTIES
Proponent	<ul style="list-style-type: none"> - Responsible for the management and implementation of the EMP - Ensure environmental policies are communicated to all personnel throughout the proposed project and that employees understand the guidelines of the EMP - Responsible for providing the resources required to complete the project tasks
Exploration Manager	<ul style="list-style-type: none"> - Overseeing exploration activities - Monitoring daily operations and ensure adherence by personnel to the EMP - Maintain the community issues and concerns register and keep records of complaints - Maintain an up to date register of employees who have completed a site induction - Ensuring that all contract workers, sub-contractors and visitors to the site are aware of the requirements of this EMP, relevant to their roles and adhere to this EMP at all times - Reporting any non-compliance or accidents - Receiving, recording and responding to complaints - Ensure adequate resources are available for the implementation of the EMP - Ensure safe and environmentally sound operations, and - Responsible for the management, maintenance, and revisions of this EMP.
Employees and Contractors	<ul style="list-style-type: none"> - Adhere to measures set out in the EMP - Ensure they have undertaken a site induction, and - Report any operations or conditions, which deviate, from the EMP as well as any non-compliant issues or accidents to the exploration manager.

2.3 CONTRACTORS

Any contractors hired during the exploration activities or for any accessory works for the project shall be compliant with this EMP, and shall be responsible for the following:

- Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements
- Implementing appropriate environmental management measures
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the Exploration Manager and/or exploration manager, and
- Ensuring appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported by employees and subcontractors.

2.4 EMPLOYMENT

The proponent and all contractors shall comply with the requirements of the Republic of Namibia Regulations for Labour, Health and Safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government, community, stakeholders and relevant authorities the proponent shall ensure that local people have access to information about job opportunities and are considered first for construction / maintenance contract employment positions
- The number of job opportunities shall be made known together with the associated skills and qualifications
- The maximum length of time the job is likely to last for shall be clearly indicated
- Foreign workers with no proof of permanent legal residence shall not be hired, and
- Every effort shall be made to recruit from the pool of unemployed workers living in the local area.

3 COMMUNICATION AND TRAINING

3.1 COMMUNICATIONS

During exploration, the exploration manager shall communicate any environmental issues to the project team through the following means (as and when required):

- Site induction
- Audits and site inspections
- Toolbox talks, including instruction on incident response procedures, and
- Key project-specific environmental issues briefings.

This EMP shall be distributed to the exploration team including any contractors and personnel working on the exploration site to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations shall be briefed to workers and contractors.

During the exploration activities, communications between the management team shall include discussing any complaints received and actions to resolve them, any inspections, audits or non-conformance with this EMP, and any objectives or target achievements.

3.2 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the project site shall be recorded by the receiver, including the name and contact details of the complainant, date and time of the complaint, and the nature of the complaint. The information shall be given to the exploration manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The exploration manager shall inform the site manager of issues, concerns or complaints. It is the duty of the exploration manager to maintain a complaint register that details the name of the complainant, date and time of the complaint, action taken to resolve the issues and date of complaint handover.

The workforce shall be informed about the complaints register, its location and the person responsible, in order to refer local residents or the general public who wish to lodge a complaint. The complainant shall be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The complaints register shall be kept for the duration of the project and will be available for government or public review upon request.

3.3 TRAINING AND AWARENESS

All personnel working on the project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training, and experience.

3.3.1 SITE INDUCTION

All personnel involved in the project shall be inducted to the site with a specific environment and social awareness training component. The environment and social awareness training shall ensure that personnel is familiar with the principles of this EMP, the environment and social aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures.

The exploration manager shall ensure a register of completed training is maintained.

The site induction should include, but not limited to the following:

- A general site-specific induction that outlines:

- What is meant by “environment” and “social”
- Why the environment needs to be protected and conserved
- How exploration activities can impact on the environment
- What can be done to mitigate against such impacts
- The inductee’s role and responsibilities with respect to implementing the EMP
- The sites environmental rules
- Details of how to deal with, and who to contact if environmental problems should they occur
- Basic vegetation clearing principals and species ID sheets
- Noise control measures for drilling in proximity to residents
- The potential consequences of non-compliance with this EMP and relevant statutory requirements, and
- The role of responsible people for the project.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 COMPLIANCE MONITORING

DAILY

A copy of this EMP shall be on site throughout the project and shall be available upon request. It is the responsibility of the Exploration Manager to ensure this EMP is complied with through their daily roles. Daily inspections will be undertaken by the Exploration Manager (or nominated site supervisor). Any environmental problems or risks identified shall be notified to the exploration manager and actioned as soon as is reasonably practicable.

MONTHLY

Monthly inspections shall be undertaken by the Exploration Manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. Any non-conformance shall be recorded, including the following a brief description of non-conformance, the reason for the non-conformance, the responsible party, the result (consequence), and the corrective action taken and any necessary follow up measures required.

4.2 NON-COMPLIANCE

4.2.1 NON-COMPLIANCE EVENT

Where it has been identified that works are not compliant with this EMP, the exploration manager shall employ corrective actions so that the works return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice shall be produced. The notice shall be generated during the inspections and the Exploration Manager shall be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event / situation, for example, is considered if:

- There is evidence of a contravention of this EMP and associated indicators or objectives
- The Exploration Manager and/or contractor have failed to comply with corrective or other instructions issued by the exploration manager or qualified authority, or
- The Exploration Manager and/or contractor fail to respond to complaints from the public.
- Works shall be stopped in the event of a non-compliance until corrective action(s) has been completed

4.2.2 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to):

- Fines / penalties
- Legal action
- Monetary penalties imposed by the proponent on the contractor
- Withdrawal of licence/s, and
- Suspension of work.

The disciplinary action shall be determined according to the nature and extent of the transgression / non-compliance, and penalties are to be weighed against the severity of the incident.

4.3 ENVIRONMENTAL PERMITS

Whilst the Water Resources Management Act, 2013 is not enforced, it is best practice to adhere to the stipulations while ensuring compliance to the Water Act of 1956 is also maintained. A licence to abstract and use water may be required if boreholes are to be created. If required, the proponent will apply for relevant permits and shall operate in accordance with any conditions in the licence.

Some vegetation shall be cleared on the EPL site to allow exploration activities to commence. It is unlikely that an area greater than 15ha shall be cleared, therefore a permit under the Forest Act, 2001 is not required.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MEASUREMENT

This chapter provides a register of environmental risks and issues, which identifies mitigation and monitoring measures, as well as roles responsible. This register will be subject to regular review by the Exploration Manager and updated when necessary.

The Exploration Manager and or Site Manager (if applicable) will use this register to undertake monthly inspections (see next section) to ensure the project is compliant with this EMP.

5.1 OBJECTIVES AND TARGETS

Environmental objectives for the project are as follows:

- Zero pollution incidents
- Minimal vegetation clearing and earthworks
- Protect local flora and fauna, and
- Use natural resources effectively and efficiently.

5.2 REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the proposed project has been completed to identify all the commitments and agreements made within the environmental scoping report. From this, a schedule of environmental commitments and risks has been produced (Table 2), which details deliverables including measures identified for the prevention of pollution or damage to the environment during exploration.

TABLE 3 – ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Use of vehicles and equipment	- Hygiene and Safety	- Amenities (e.g. portable toilets) shall be provided and set up in a suitable location (if required).	- Daily observations	- Exploration Manager
	- Emissions	- All vehicles and machinery/ equipment to be shut down or throttled back between periods of use.	- Daily observations	- Exploration Manager
	- The potential loss of oil and fuel causing ground contamination	- Refueling shall be undertaken in a designated area - All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil - In the event of pollution, polluted soils must be collected and disposed of at an approved site	- Daily observations	- Exploration Manager
	- Water contamination	- Water during drilling should be retained in a lined pond to prevent pollution, and - A 'good housekeeping' policy shall be adopted across the construction and maintenance working area	- Daily observations	- Exploration Manager
	- Dust generation	- Use existing access roads and tracks where possible - Apply dust suppression methods such as water spraying during drilling operations - Restricted speeds (<30km/h), and - Specific activities that may generate dust and impact on residents shall be avoided during high wind events.	- Daily observations	- Exploration Manager
	- Noise generation	- Noise shall be minimised as much as possible during the exploration works - No hammering of drill rods with steel hammers in proximity to nearby farm houses - Drill equipment shall be suitably positioned to ensure that noisy equipment is away from human receptors - Noise suppression measures shall be applied if drilling occurs in locations that may affect residents and during evening periods - Residents shall be provided at least two weeks' notice of drilling operations within 1km of their property, and - Continual engagement with residents shall be undertaken with the proponent.	- Daily observations	- Exploration Manager
General exploration activities	- Loss of access or access affected to the farm and farm	- Access to farms and all farm areas shall always be made available, and - Cattle water holes and feeding areas to remain unaffected.	- Daily observations	- Exploration Manager

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
	<ul style="list-style-type: none"> – areas, and – Farm operations 			
Vegetation clearance	<ul style="list-style-type: none"> – Alien species 	<ul style="list-style-type: none"> – All project equipment arriving on site from an area outside of the project or coming from an area of known weed infestations (no present on the project site) should have an internal weed and seed inspection completed prior to equipment being used – Ensure the potential introduction and spread of alien plants is prevented, and – Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants. 	<ul style="list-style-type: none"> – If required, monitor the removal of the alien invasive vegetation, and – Check the tyre of vehicles after use on site. 	<ul style="list-style-type: none"> – Employees – Exploration Manager
	<ul style="list-style-type: none"> – Dust generation 	<ul style="list-style-type: none"> – Apply speed restrictions, and – Avoid off road driving. 	<ul style="list-style-type: none"> – Daily observations 	<ul style="list-style-type: none"> – Exploration Manager
	<ul style="list-style-type: none"> – Reduced soil quality 	<ul style="list-style-type: none"> – Use existing tracks where possible – Refueling to occur in designated areas with drip trays, and – Avoid natural drainage lines for exploration activities. 	<ul style="list-style-type: none"> – Daily observations 	<ul style="list-style-type: none"> – Exploration Manager
	<ul style="list-style-type: none"> – Injure or kill animals 	<ul style="list-style-type: none"> – No driving off designated access routes (into the bush) / off-road driving – No snares or catching of animals, no keeping or housing of pets for food, and – No animals or birds may be collected, caught, consumed or removed from site by the Contractor or personnel on site. 	<ul style="list-style-type: none"> – Daily observations 	<ul style="list-style-type: none"> – Exploration Manager
	<ul style="list-style-type: none"> – Removal of vegetation – loss of flora and fauna, protected/important species 	<ul style="list-style-type: none"> – Use existing tracks where possible – Route new tracks around established and protected trees, and clumps of vegetation – Identify rare, endangered, threatened and protected species. Demarcate and avoid cutting down, and clearly highlight to construction workers so that they are avoided, and – Avoid natural drainage lines. 	<ul style="list-style-type: none"> – Daily visual inspection during construction of new access tracks/widening 	<ul style="list-style-type: none"> – Employees – Exploration Manager.

ACTIVITY	– POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	– MONITORING REQUIREMENTS	– RESPONSIBILITY
<p>Site and ground preparation – creation of access tracks and areas for setting up drill rigs</p>	<ul style="list-style-type: none"> – Heritage remains 	<p>Discovery of unearthed archaeological remains to be uncovered, the following measures (chance find procedure) shall be applied:</p> <ul style="list-style-type: none"> – Works to cease, area to be demarcated with appropriate tape by the site supervisor, and the Exploration Manager to be informed – Exploration Manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform the Environmental Consultant with the GPS position if possible – If works cannot proceed without damage to findings, Exploration Manager to inform the Environmental Consultant for the archaeologist inspection and advice – Environment Compliance Consultancy’s Archaeologist will evaluate the significance of the remains and identify appropriate action, for example, record and remove; relocate or leave in situ (depending on the nature and value of the remains) – Inform the police if the remains are human, and – Obtain appropriate clearance or approval from the competent authority, if required, and recover and remove the remains to the National Museum or National Forensic Laboratory as directed. 	<ul style="list-style-type: none"> – Daily observations 	<ul style="list-style-type: none"> – Exploration Manager
<p>Fuel handling and storage</p>	<ul style="list-style-type: none"> – Loss of containment leading to ground or groundwater contamination 	<p>Safe Delivery and handling:</p> <ul style="list-style-type: none"> – Training employees and Toolbox Talks – Good housekeeping across site – Fuel is handled with care – Spill kits to be available for use during refueling, fuel delivery or use. – Absorption material should be available. Where saw dust is used it should be cleaned up immediately and not left for long periods – Any spill is to be reported to the Exploration Manager once containment has been achieved. – Plant and equipment to be well maintained and serviced regularly, and – In the field, use of hydrocarbons under 200 liters can be used for mobile refueling or servicing. – Fuel spills of greater than 200lts are to be reported to the MME in terms of the Petroleum Products and Energy Act, 1990 <p>Storage:</p> <ul style="list-style-type: none"> – All tanks to be stored on a non-porous floor and bunded area 	<ul style="list-style-type: none"> – Daily observations when fuels are delivered and handled – Supervision during refueling, and – Weekly observations monitor containment and storage. 	<ul style="list-style-type: none"> – Exploration manager

		<ul style="list-style-type: none"> - Bund to be capable of storing at least 110% of the volume of the tank - All containers to be suitable for use and not damaged - Tanks are locked at all times, and - Spill kits available at in suitable locations. <p>Refueling</p> <ul style="list-style-type: none"> - Drip trays to be used during refueling of vehicles and on a permeable flat surface where possible, and - Funnels should be available and used to avoid spillage during decanting. 		
Generation of waste	<ul style="list-style-type: none"> - Nuisances (odors and visual) - Land use, and - Litter (nuisance and ecological risk). 	<ul style="list-style-type: none"> - Training and Toolbox Talks - Good housekeeping across site - All working areas shall apply good house-keeping - Implement the waste management hierarchy across site: Avoid, reuse, recycle, then disposal through burning or landfill - Waste shall be collected and shall be removed on a regular basis to avoid pests and bad odours, and - It is unlikely that hazardous material and wastes will be produced, however in the event that they do, they shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. Hazardous and non-hazardous waste shall be stored separately at all times. 	<ul style="list-style-type: none"> - Daily observations, and - Weekly checks 	<ul style="list-style-type: none"> - Exploration Manager - Employees
Resource use	<ul style="list-style-type: none"> - Inefficient use of water 	<ul style="list-style-type: none"> - Use water effectively and efficiently 	<ul style="list-style-type: none"> - Daily observations 	<ul style="list-style-type: none"> - Exploration Manager - Employees
Job creation	<ul style="list-style-type: none"> - Employment creation and skills development opportunities during the exploration phase. 	<ul style="list-style-type: none"> - Maximise local employment and local business opportunities - Enhance the use of local labour and local skills as far as reasonably possible - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	<ul style="list-style-type: none"> - Daily observations, and - Weekly checks. 	<ul style="list-style-type: none"> - Exploration Manager - Employees

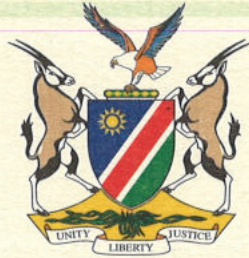
6 IMPLEMENTATION OF THE EMP

Exploration work will be carried out in compliance with the relevant requirements of the Minerals (Prospecting and Mining) Act, 1992. No significant impacts are anticipated for the activities that have been identified and management and mitigation measures are in place for potential risks.

This EMP:

- A. Has been prepared pursuant to a contract with the proponent
- B. Has been prepared on the basis of information provided to ECC up to January 2019
- C. Is for the sole use of the proponent, for the sole purpose of an EMP
- D. Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP, and
- E. Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP on the basis of information provided by the proponent, specialist reports and the environmental scoping report.



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental Management Act (Act No. 7 of 2007)

TO

Votorantim Metals Namibia (Pty) Ltd
P O Box 97957, Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

EXPLORATION ACTIVITIES ON EPL6927 FOR BASE AND RARE METALS, INDUSTRIAL MINERALS, AND PRECIOUS METALS, OTJOZONDJUPA REGION, NAMIBIA.



[Signature]

DEPUTY ENVIRONMENTAL COMMISSIONER

Issued on the date: 2019-06-25

Expires on this date: 2022-06-25

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ENVIRONMENTAL REPORT (ER) (Prospecting Companies)

INSTRUCTIONS:

1. An Environmental Report shall be submitted to the Ministry of Environment and Tourism (MET) biannually. Jan to Jun and Jun to December: Please indicate:

01 January to 30 June 2021

2. This form shall be the minimum reporting format. Prospecting Companies are expected to attach a map of their prospecting area to this report. Prospecting Companies are welcome to attach any other information they like, such as copies of new agreements, letters of explanation, aerial photographs, or anything else of interest.

3. The map shall be used to indicate the following:

- * areas where prospecting has taken place,
- * roads or tracks made and/or used,
- * houses and other infrastructure erected,
- * excavations or other scars which have been rehabilitated,
- * conflict areas, etc....

MINISTRY OF ENVIRONMENT
FORESTRY AND TOURISM

DIRECTORATE OF ENVIRONMENTAL AFFAIRS

12 OCT 2021

Tel: 061 284 2701

RECEIVED 2

Signature:

4. It is recommended (but not compulsory) that Prospecting Companies attach photographs to their report, which visually illustrate the activities described in their report.

5. Failure to submit an Environmental Report shall constitute a breach of the Environmental Contract, which could result in steps taken against the Prospecting Company.

6. All information contained in the Environmental Report shall be treated as confidential.

7. The Prospecting Company shall ensure that all the information recorded in the Environmental Report is, to their best knowledge, accurate and correct.

Completed Environmental Reports should be sent to :

The Permanent Secretary
Ministry of Environment and Tourism
Private Bag 13306
Windhoek

For Attention: Saima S. Angula

A. COMPANY DETAILS AND REPORTING PERIOD :

Name of Company: Votorantim Metals Namibia (Pty) Ltd

Address of Company: 9B South Port Office Park, Hosea Kutako Avenue,
P O Box 97957, Maerua Park, Windhoek, Namibia

Tel: 061-221016 Fax number: 061-231083 E-mail: efreyer@iway.na

Name of person compiling report: E E Freyer

Reference number(s) of prospecting area / block / license: EPL 6927

Geographical location of area / block / license: Grootfontein District,
Otjozondjupa Region

This report is for the period of : (tick the relevant box and fill in the year)

 January - June 2021 July - December

Other (please specify)

B. POLLUTION AND WASTEHas all domestic refuse (eg. Household waste, bottles, tins, paper, plastic, etc)
been removed from the prospecting area ?yes no

If "yes" above, specify the site where such refuse has been deposited : n/a

How often is refuse removed to the site mentioned above ? : every week

every two weeks

every three weeks

once a month

at irregular intervals

If refuse has not been removed, where has it been dumped ? Otavi municipal waste disposal site

As far as litter is concerned, would you
describe your prospecting area as :Very clean Reasonably clean Filthy

If your prospecting area is littered with refuse, please indicate how you intend cleaning it up:

Refuse and litter found in the areas that we work in is collected and removed to municipal waste-dump

Are toilets provided for all staff employed by the prospecting company :

yes no If "yes" above, are they : Flush toilets Chemical Toilets Pit Latrines Other

If chemical toilets are used, how are old chemicals disposed of :

Deposited in evaporation ponds Deposited in a municipal refuse dump Buried on site Other (specify)

F. INFRASTRUCTURAL DEVELOPMENT

Infrastructural Developments means any offices, houses, sheds, cement slabs, or other buildings or foundations for buildings. It also includes storage tanks (for water, fuel or other substances), temporary housing such as mobile homes & caravans, prefab units and tented camps. Please report on new construction or additions to buildings you reported on, in your previous Environmental Report.

Was any NEW infrastructure established during this period ? yes no
 If "yes" above, is this infrastructure: Permanent Temporary A combination
 Describe infrastructure by ticking boxes: Offices Housing Sheds
 Prefab structure Garages Storage tanks
 Cement slabs Foundations Other
 If "other", please specify: *Tented camps (geophysical contractors' staff); otherwise staff is resident in Otavi or accommodated in a guesthouse in Otavi*

G. BOREHOLES, SAMPLE HOLES OR OTHER DRILLING

This category includes holes drilled for water, for taking mineral or other samples, for setting explosives, for testing mineral quality, or any other purpose.

Were any holes drilled during this period ? yes no
 If "yes", for which purpose were they drilled ? Water depth Quantity
 Sampling depth up to 140 m Quantity 1 DD
 Explosives depth Quantity
 Other: RAB (specify) Total meterages: DD: 140.66m Quantity: DD: 1 hole
 List of borehole numbers and depths: *See list of DD drill-holes attached*

H. WATER

Your estimated monthly water consumption during this period was: *143.5 cubm*

Water was obtained from : River Borehole Dam Water Affairs Other

Please estimate the percentage of water used for the following activities during this period:

Human consumption	<input type="checkbox"/> <input type="checkbox"/> %
Toilets	<input type="checkbox"/> <input type="checkbox"/> %
Prospecting activities	<input type="checkbox"/> <input type="checkbox"/> %
Washing vehicles & equipment	<input type="checkbox"/> <input type="checkbox"/> %
Dust control	<input type="checkbox"/> <input type="checkbox"/> %
Building activities	<input type="checkbox"/> <input type="checkbox"/> %
Gardens	<input type="checkbox"/> <input type="checkbox"/> %
Recreation	<input type="checkbox"/> <input type="checkbox"/> %
Other (Drilling)	100 %

Were there any accidents which caused a loss of water ? yes no

If "yes", please give details

.....

.....

I. PROTECTION OF FAUNA AND FLORA

Please answer the following questions by ticking the appropriate boxes :

Question :	Yes	No	Unsure
Were any mammals, birds, reptiles or fish killed or wounded (purposefully or accidentally) in the prospecting site or area ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Were any plants (excluding grasses) picked, damaged or removed ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was there any wood collecting in the area ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

J. RELATIONS WITH NEIGHBOURS, OFFICIALS AND/OR THE GENERAL PUBLIC

Were there any conflicts with neighbours, land-owners, Government Officials or the public during this period ?

Yes No

If "yes" above, what was the nature of these conflicts ? (tick boxes to provide answers)

People entered the prospecting area without permission or prior arrangement	<input type="checkbox"/>
Complaints about reduced access to water or other resources	<input type="checkbox"/>
Complaints about danger posed to livestock or wildlife	<input type="checkbox"/>
Allegations about stock-theft or poaching	<input type="checkbox"/>
Complaints about vehicle or equipment movement on access roads / tracks	<input checked="" type="checkbox"/>
Complaints about litter or other types of pollution (eg. noise, dust, etc.)	<input checked="" type="checkbox"/>
Complaints about the activities / actions of company staff	<input checked="" type="checkbox"/>
Allegations that the Company was not adhering to contracts / agreements	<input checked="" type="checkbox"/>
Allegations that the Company damaged property or installations	<input type="checkbox"/>
Allegations that gates were left open or unlocked	<input type="checkbox"/>
Other (specify):	<input type="checkbox"/>

If conflicts arose, indicate how these were resolved ? (tick boxes)

Verbal agreement after discussions.....	<input checked="" type="checkbox"/>
Written agreement by special contract.....	<input type="checkbox"/>
Instructions to company staff to avoid conflicts.....	<input checked="" type="checkbox"/>
Company rectified its mistakes and undertook to avoid future wrong-doing....	<input checked="" type="checkbox"/>
Court action or other third party arbitration.....	<input type="checkbox"/>
Other (specify)	<input type="checkbox"/>
The conflicts remain unsolved.....	<input type="checkbox"/>

Any other comments or information :

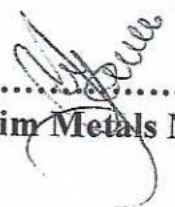
.....

See next page for more space for "additional comments"

Additional comments continued

1. Some 34.8 km (33 lines) were surveyed on the farms Askevold, Naueis and Altona, using the AMT survey method. Access lines (1m wide) were cut for access on foot (and for laying out survey cables).
2. Some 4723 small pits (0.2 x 0.2 x 0.2m) soil pits were made for electrodes and were closed after the AMT & IP surveys along 29 lines.
3. Diamond drilling started on 18/06/2021 and 1 holes (end-of-month depth 140.66m) was drilled.
4. Drill access roads and sites cleared cover 0.48 ha.
5. Drill-hole list (with position and end-of-month depth) is attached.

I declare that the information provided in this Environmental Report is, to the best of my knowledge, accurate and correct.

.....

Votorantim Metals Namibia (Pty) Ltd

.....

Date

Votorantim Metals Namibia (Pty) Ltd
 Southport, Office 9B, Hosea Kutako Drive
 PO Box 97957, Maerua Park
 Windhoek, Namibia
 Telephone Nr: +264 61 221016
 Facsimile Nr: +264 61 231083

NO OF HOLES	HOLE NO.	LATITUDE	LONGITUDE	TYPE (DD, RAB, RC)	DEPTH
1	NANAND000016	7812399	763806	Diamond drilling (core)	140.66m

1	Hole			Total meterage	140.66
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Windhoek

For Attention: Saima S. Angula

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
DIRECTORATE OF ENVIRONMENTAL AFFAIRS
10 FEB 2022
Tel: 061 284 2701
RECEIVED 2
Signature:.....

A. COMPANY DETAILS AND REPORTING PERIOD :

Name of Company: Votorantim Metals Namibia (Pty) Ltd

Address of Company: 9B South Port Office Park, Hosea Kutako Avenue,
P O Box 97957, Maerua Park, Windhoek, Namibia

Tel: 061-221016 Fax number: 061-231083 E-mail: efreyer@iway.na

Name of person compiling report: E E Freyer

Reference number(s) of prospecting area / block / license: EPL 6927

Geographical location of area / block / license: Grootfontein District,
Otjozondjupa Region

This report is for the period of : (tick the relevant box and fill in the year)

January - June

July - December 2021

Other (please specify)

B. POLLUTION AND WASTE

Has all domestic refuse (eg. Household waste, bottles, tins, paper, plastic, etc)
been removed from the prospecting area ?

yes no

If "yes" above, specify the site where such refuse has been deposited : *Otavi municipal waste-dump*

How often is refuse removed to the site mentioned above ? : every week
every two weeks
every three weeks
once a month
at irregular intervals

If refuse has not been removed, where has it been dumped ? *Otavi municipal waste disposal site*

As far as litter is concerned, would you
describe your prospecting area as :

Very clean Reasonably clean Filthy

If your prospecting area is littered with refuse, please indicate how you intend cleaning it up:

Refuse and litter found in the areas that we work in is collected and removed to municipal waste-dump

Are toilets provided for all staff employed by the prospecting company : yes no

If "yes" above, are they : Flush toilets Chemical Toilets Pit Latrines Other

If chemical toilets are used, how are old chemicals disposed of :

Deposited in evaporation ponds Deposited in a municipal refuse dump
Buried on site Other (specify)

C. VEHICLES AND EARTHMOVING EQUIPMENT

Indicate the types and number of vehicles and earthmoving equipment used on site during the reporting period (tick box in front of the category of vehicles used and then fill in the next boxes to indicate numbers)

<input checked="" type="checkbox"/>	Pick-up trucks ("bakkies"), either 2x4 or 4x4	How many in use	up to 4
<input checked="" type="checkbox"/>	Lorries / trucks between 5 - 10 ton capacity	How many in use	up to 2
<input type="checkbox"/>	Lorries / trucks larger than 10 ton capacity	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	Bulldozer of any size	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	Road Grader of any size	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/>	Front-end loader of any size	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/>	Drilling machine of any type	How many in use	2 (DD)
<input type="checkbox"/>	Other (specify) tractor.....	How many in use	1

D. ROADS AND TRACKS (In addition to ticking the following boxes, please draw roads/tracks made on an accompanying map in blue ink. Roads which have been rehabilitated (ie. restored to their natural state) can be scratched out in red pen.

Have new roads or tracks been made during the reporting period ? yes no

If "yes" above, how long are these (in kilometres) ? 3.1 km

If "yes" above are these still in use ? yes no

If "no" above have any of these roads or tracks been rehabilitated ? yes no

If "yes" above, how have you done such rehabilitation ? : ripping raking sweeping
 Other (specify): will still be used, then left to rehabilitate naturally

If road / track rehabilitation has taken place, how many kilometres of roads or tracks have been rehabilitated ? n/a

E. TRENCHES OR PITS: If new trenches or pits were made in the site / area during the reporting period, please indicate these by ticking the appropriate boxes AND by means of illustrating them on the same map described above. New pits or trenches made, should be numbered and drawn as a CIRCLE in blue ink, while pits or trenches which were rehabilitated during the reporting period should be scratched out in RED ink.

Have new trenches or pits been excavated in your area during the reporting period ? yes no

If "yes" above, what are their approximate sizes or dimensions ? (in metres)

1. Drilling sumps (14) with dimensions: 1.5m length x 1.5m breadth x 0.5m depth
2. Trench / pit No.2 : Size / dimensions : Cubic metres or length x width x depth
3. Trench / pit No.3 : Size / dimensions : Cubic metres or length x width x depth
4. Trench / pit No.4 : Size / dimensions : Cubic metres or length x width x depth

Were any holes/trenches rehabilitated during this period of reporting ? yes (show on map) no

F. INFRASTRUCTURAL DEVELOPMENT

Infrastructural Developments means any offices, houses, sheds, cement slabs, or other buildings or foundations for buildings. It also includes storage tanks (for water, fuel or other substances), temporary housing such as mobile homes & caravans, prefab units and tented camps. Please report on new construction or additions to buildings you reported on, in your previous Environmental Report.

Was any NEW infrastructure established during this period ? yes no

If "yes" above, is this infrastructure: Permanent Temporary A combination

Describe infrastructure by ticking boxes: Offices Housing Sheds
 Prefab structure Garages Storage tanks
 Cement slabs Foundations Other

If "other", please specify: *Tented camps (geophysical contractors' staff); otherwise staff is resident in Otavi or accommodated in a guesthouse in Otavi*

G. BOREHOLES, SAMPLE HOLES OR OTHER DRILLING

This category includes holes drilled for water, for taking mineral or other samples, for setting explosives, for testing mineral quality, or any other purpose.

Were any holes drilled during this period ? yes no

If "yes", for which purpose were they drilled ? Water depth Quantity
 Sampling depth up to 596.73 m Quantity 14 DD
 Explosives depth Quantity

Other: n/a Total meterages: 5507.61m Quantity: DD: 14 DD holes
 List of borehole numbers and depths: *See attached list of drillholes and drillhole details as well as drill-hole locality maps*

H. WATER

Your estimated monthly water consumption during this period was: 3,030 cubm

Water was obtained from : River Borehole Dam Water Affairs Other

Please estimate the percentage of water used for the following activities during this period:

Human consumption	4 %
Toilets	<input type="checkbox"/> <input type="checkbox"/> %
Prospecting activities	<input type="checkbox"/> <input type="checkbox"/> %
Washing vehicles & equipment	1 %
Dust control	<input type="checkbox"/> <input type="checkbox"/> %
Building activities	<input type="checkbox"/> <input type="checkbox"/> %
Gardens	<input type="checkbox"/> <input type="checkbox"/> %
Recreation	<input type="checkbox"/> <input type="checkbox"/> %
Other (Drilling)	95 %

Were there any accidents which caused a loss of water ? yes no

If "yes", please give details

.....

.....

I. PROTECTION OF FAUNA AND FLORA

Please answer the following questions by ticking the appropriate boxes :

Question :	Yes	No	Unsure
Were any mammals, birds, reptiles or fish killed or wounded (purposefully or accidentally) in the prospecting site or area ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Were any plants (excluding grasses) picked, damaged or removed ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was there any wood collecting in the area ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

J. RELATIONS WITH NEIGHBOURS, OFFICIALS AND/OR THE GENERAL PUBLIC

Were there any conflicts with neighbours, land-owners, Government Officials or the public during this period ?

Yes No

If "yes" above, what was the nature of these conflicts ? (tick boxes to provide answers)

People entered the prospecting area without permission or prior arrangement	<input type="checkbox"/>
Complaints about reduced access to water or other resources	<input type="checkbox"/>
Complaints about danger posed to livestock or wildlife	<input type="checkbox"/>
Allegations about stock-theft or poaching	<input type="checkbox"/>
Complaints about vehicle or equipment movement on access roads / tracks	<input checked="" type="checkbox"/>
Complaints about litter or other types of pollution (eg. noise, dust, etc.)	<input checked="" type="checkbox"/>
Complaints about the activities / actions of company staff	<input checked="" type="checkbox"/>
Allegations that the Company was not adhering to contracts / agreements	<input checked="" type="checkbox"/>
Allegations that the Company damaged property or installations	<input type="checkbox"/>
Allegations that gates were left open or unlocked	<input type="checkbox"/>
Other (specify):	

If conflicts arose, indicate how these were resolved ? (tick boxes)

Verbal agreement after discussions.....	<input checked="" type="checkbox"/>
Written agreement by special contract.....	<input type="checkbox"/>
Instructions to company staff to avoid conflicts.....	<input checked="" type="checkbox"/>
Company rectified its mistakes and undertook to avoid future wrong-doing....	<input checked="" type="checkbox"/>
Court action or other third party arbitration.....	<input type="checkbox"/>
Other (specify)	<input type="checkbox"/>
The conflicts remain unsolved.....	<input type="checkbox"/>

Any other comments or information :

.....

See next page for more space for "additional comments".....

Additional comments continued

The main exploration activity from July to December 2021 was core drilling.

Drill access tracks and drill-sites (in total 1.48ha) were cleared.

1. Some 0.78 ha access tracks in bush-encroached areas were cleared for drilling access (3.1 km).
 The access tracks were made by hand, which left the soil undisturbed. This will allow grass to re-grow naturally in the 2021/22 rainy season. Started gravelling main access track to farm Neuwerk.

2. Fourteen drill-sites were cleared, amounting to a total area of 0.7 ha. These tracks and drill-sites are now also available for productive use to the landowner.

3. Fourteen sumps (1.5m x 1.5m x 0.5m) were dug for water recycling purposes during drilling and closed after the drilling was completed.

Attachments to this report:

1. A drill-hole list is appended that gives the exact location coordinates, drill-hole orientation and drill-hole depths of 4 core (diamond) drill-holes drilled (5507.61m).

2. Drill-site Rehabilitation Report for the second half of 2021.

I declare that the information provided in this Environmental Report is, to the best of my knowledge, accurate and correct.

.....

Votorantim Metals Namibia (Pty) Ltd

.....

Date

Votorantim Metals Namibia (Pty) Ltd.
 Southport, Office 9B, Hosea Kutako Drive
 PO Box 97957, Maerua Park
 Windhoek, Namibia
 Telephone Nr: +264 61 221016
 Facsimile Nr: +264 61 231083

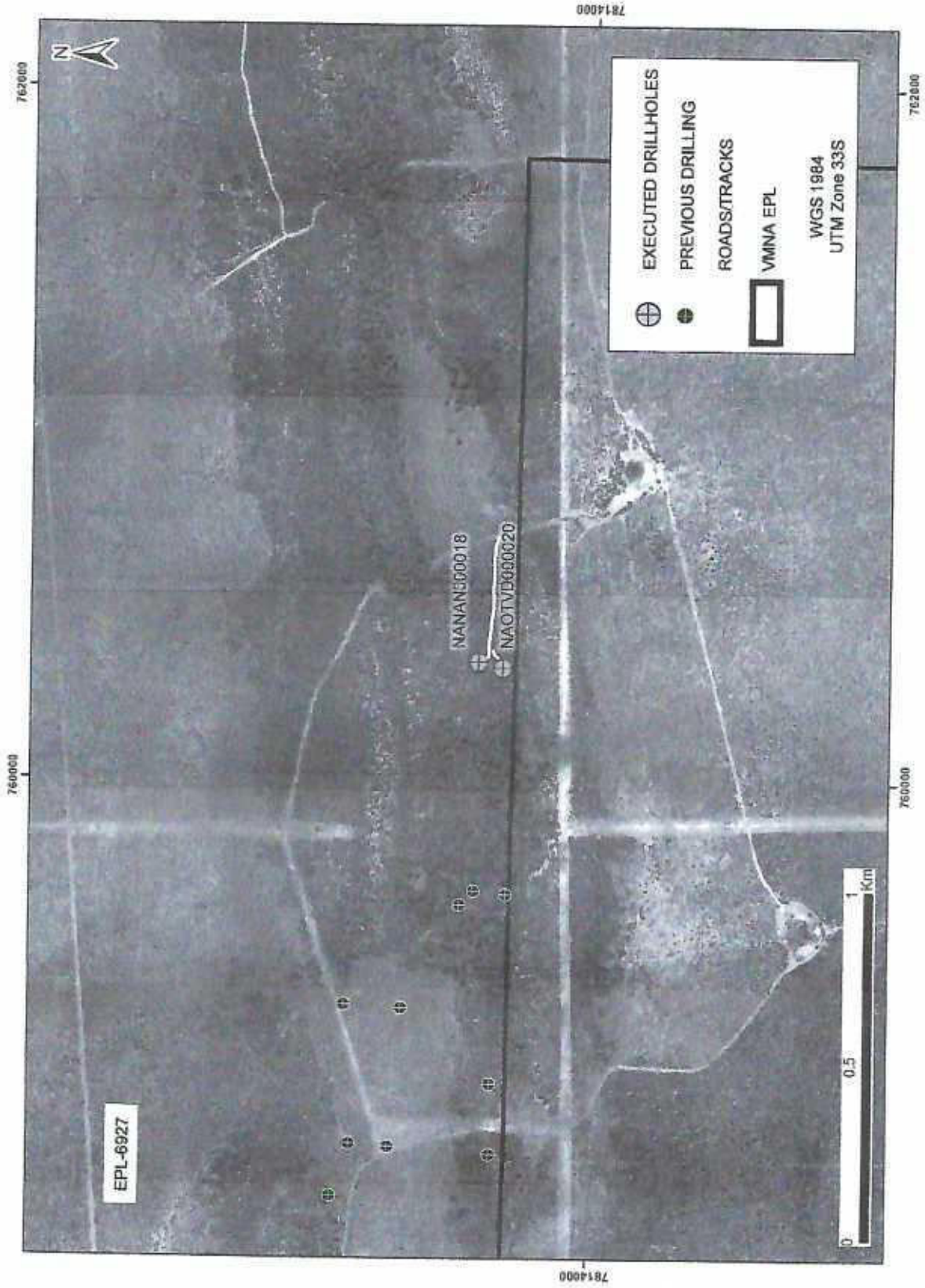
EPL 6927 - 2021-H2

NO OF HOLES	HOLE NO.	LATITUDE	LONGITUDE	TYPE (DD, RAB, RC)	DEPTH
1	NANAND000017	7812299 N	763712 E	Diamond drilling (core)	461.68m (E.O.H)
2	NANAND000018	7814327 N	760345 E	Diamond drilling (core)	308.67m (E.O.H)
3	NANAND000019	7812866 N	763879 E	Diamond drilling (core)	426.49m (E.O.H)
4	NANAND000020	7814257 N	760328 E	Diamond drilling (core)	314.67m (E.O.H)
5	NANAND000021	7813824 N	767716 E	Diamond drilling (core)	596.73m (E.O.H)
6	NANAND000022X	7814480 N	762948 E	Diamond drilling (core)	83.37m (E.O.H)
7	NANAND000023	7814485 N	762947 E	Diamond drilling (core)	422.67m (E.O.H)
8	NANAND000024	7813592 N	770973 E	Diamond drilling (core)	452.65m (E.O.H)
9	NANAND000025	7814593 N	757353 E	Diamond drilling (core)	416.77m (E.O.H)
10	NANAND000026	7814454 N	757344 E	Diamond drilling (core)	425.49m (E.O.H)
11	NANAND000027	7814722 N	756367 E	Diamond drilling (core)	341.67m (E.O.H)
12	NANAND000028	7814612 N	757358 E	Diamond drilling (core)	311.67m (E.O.H)
13	NANAND000029	7814350 N	755341 E	Diamond drilling (core)	468.00m (E.O.H)
14	NANAND000030	7814512 N	755262 E	Diamond drilling (core)	251.67m (E.O.H)
15	NANAND000031	7814512 N	755262 E	Diamond drilling (core)	167.47m current
16	NANAND000032	7814719 N	756830 E	Diamond drilling (core)	302.47m (E.O.H.)

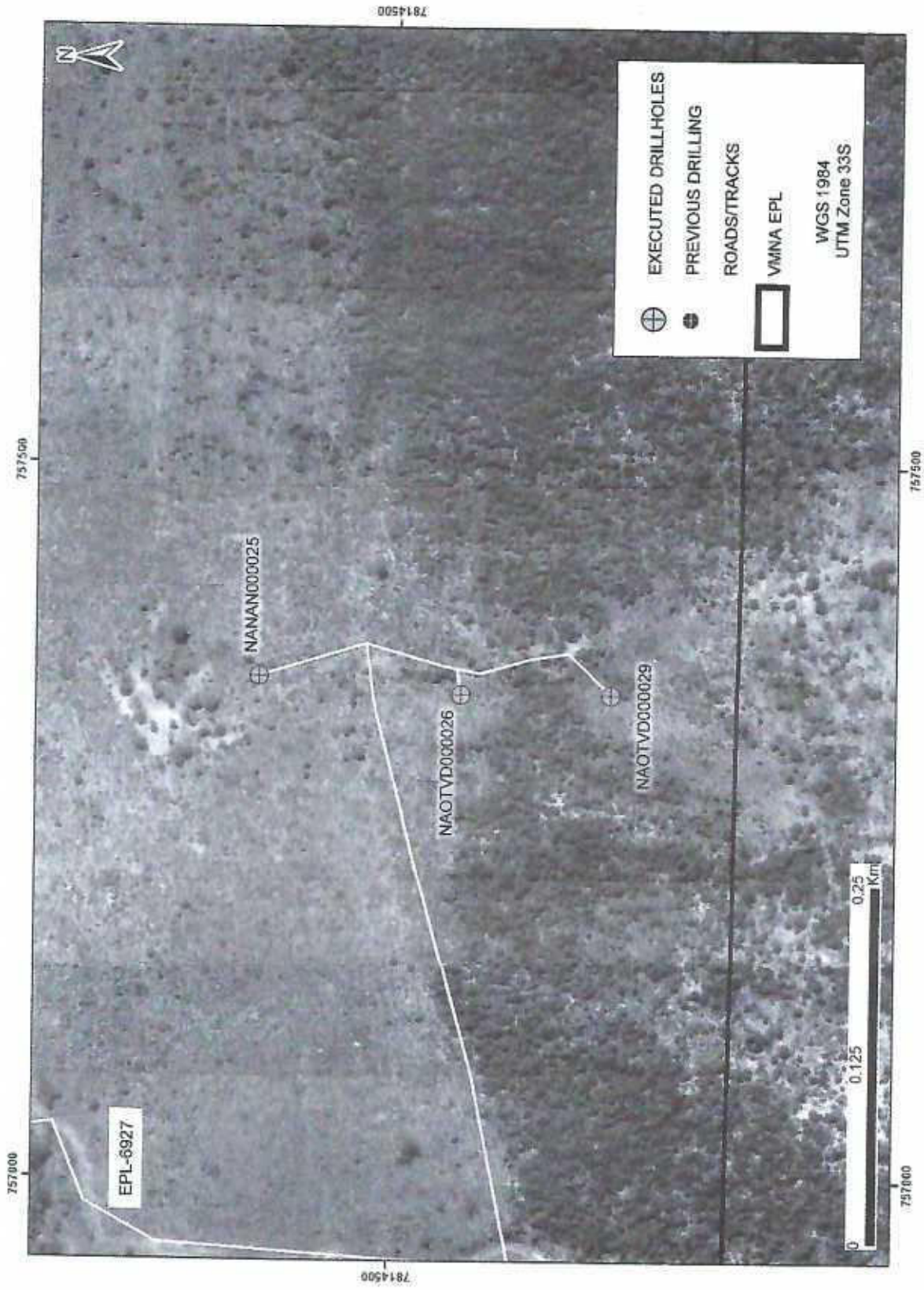
16	Holes
----	-------

Total meterage	5752.14
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EPL 6927
(DBL
East)



EPL 6927
(DBL
West)



7814500

757500

757500

757000

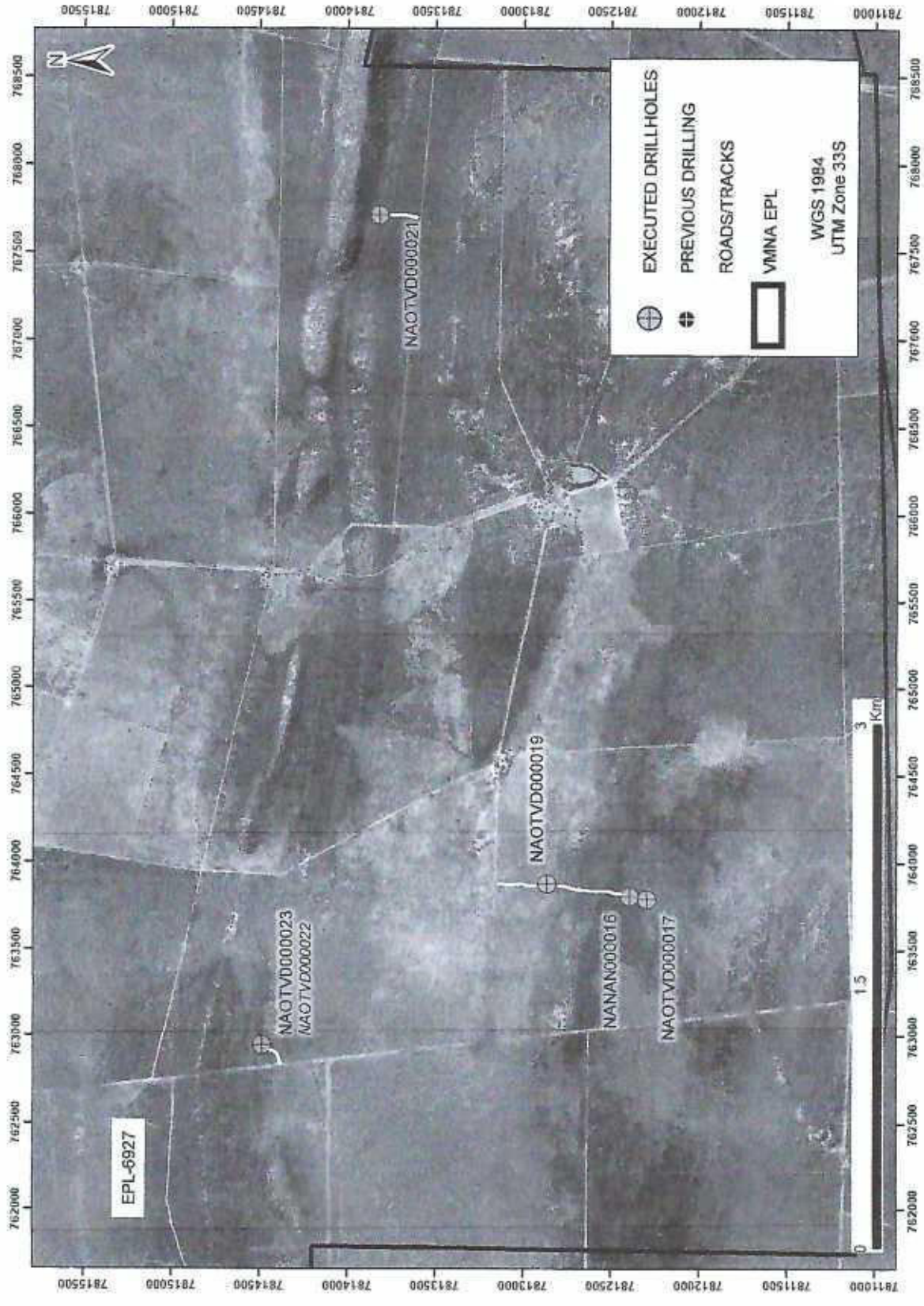
757000

7814500

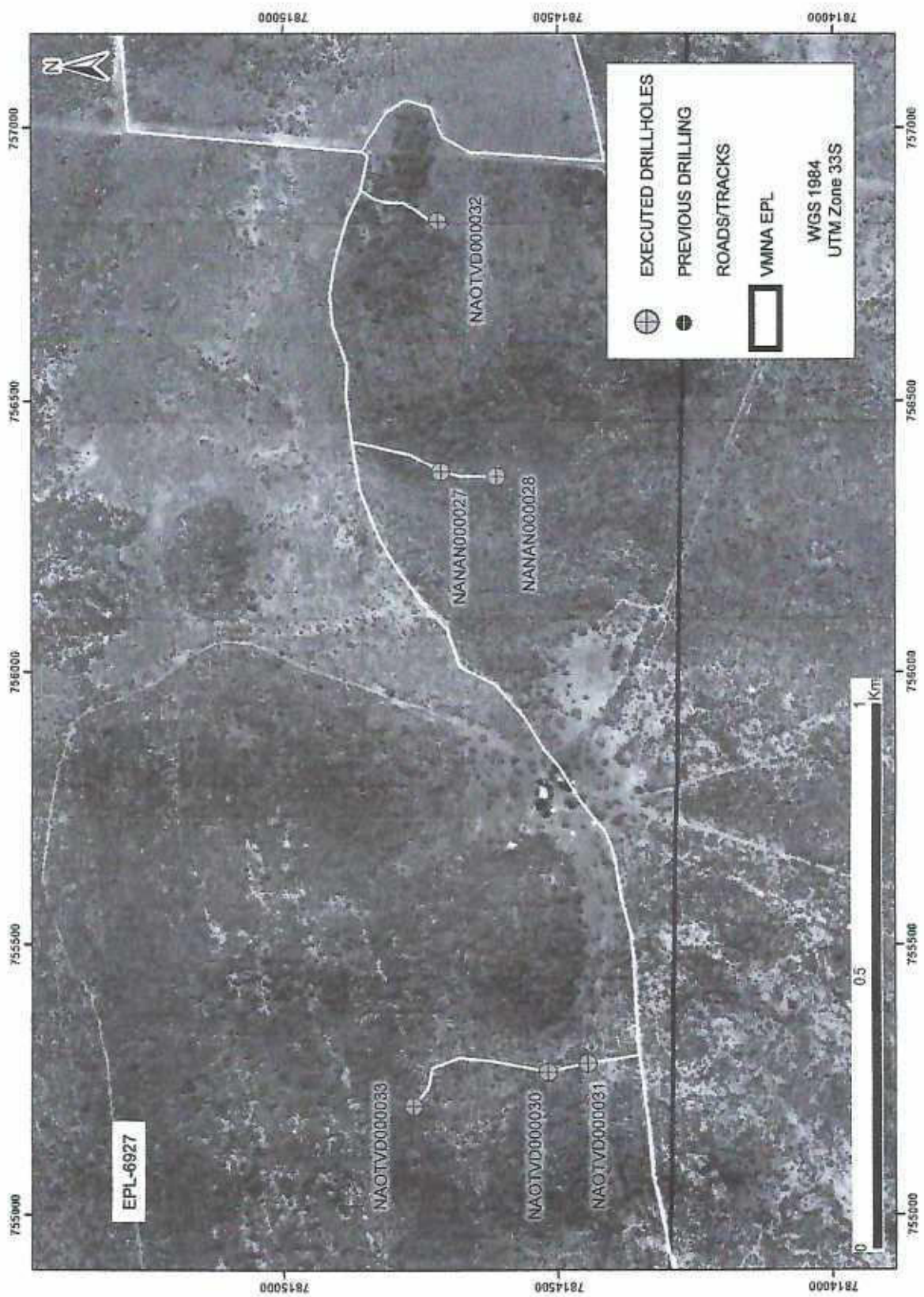
EXECUTED DRILLHOLES
PREVIOUS DRILLING
ROADS/TRACKS
VMNA EPL
WGS 1984
UTM Zone 33S



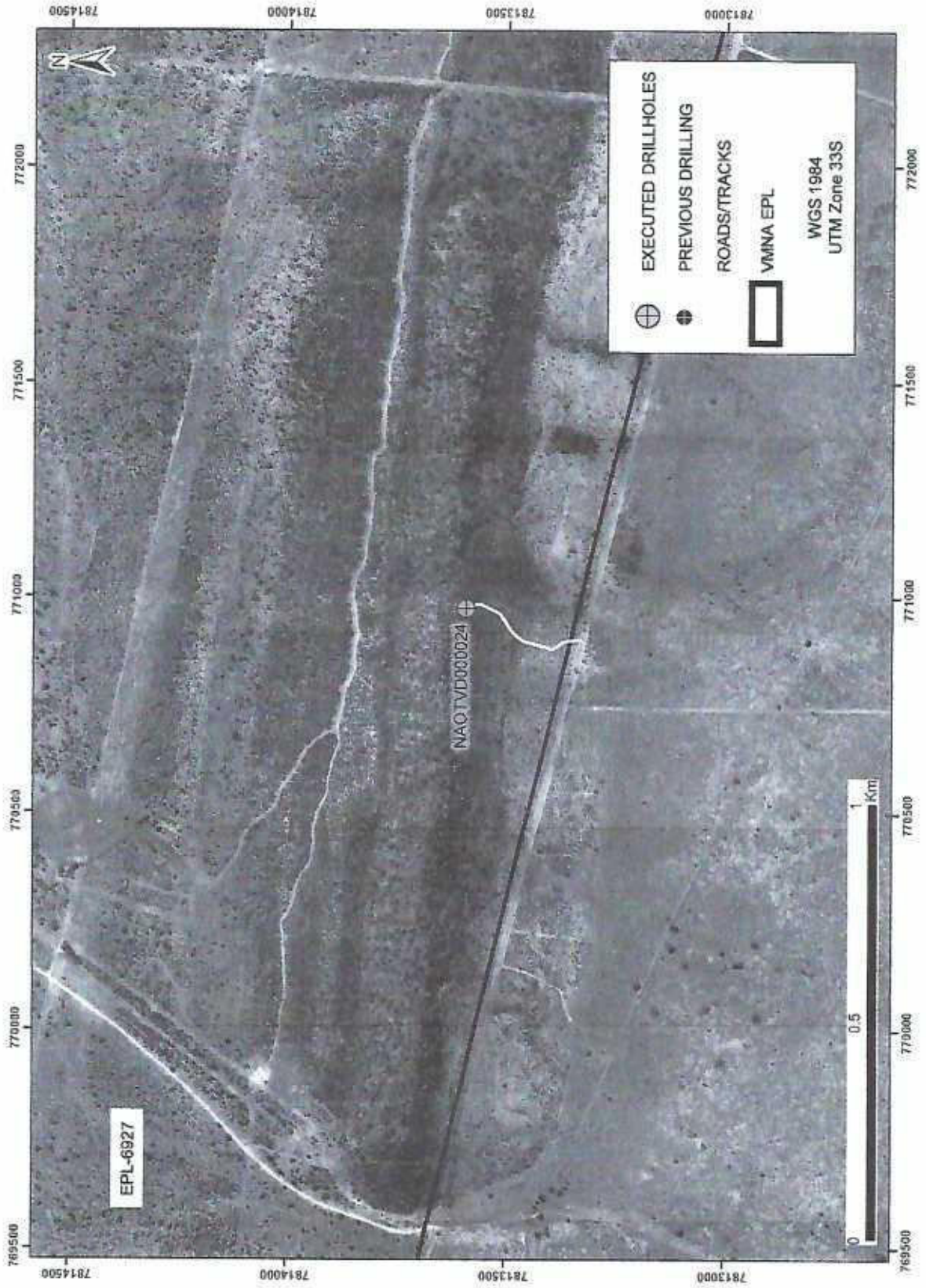
EPL 6927
(HBPS)

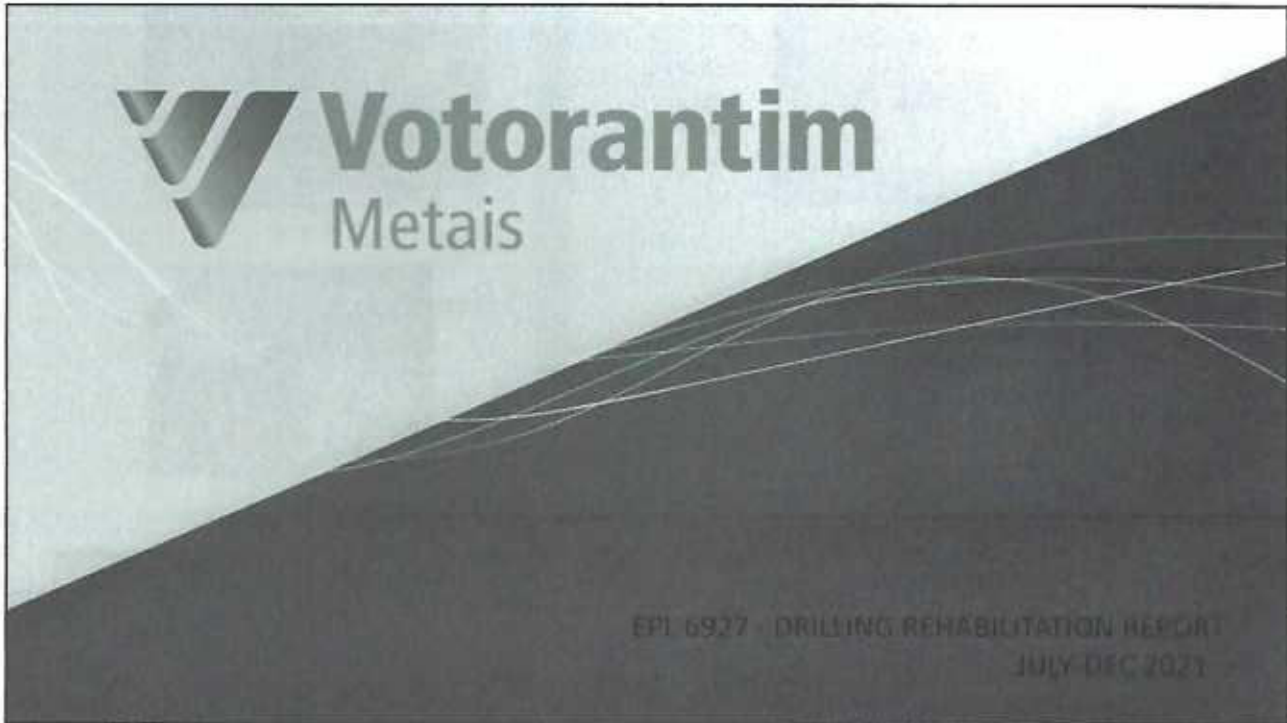


EPL 6927
(HOHT)




EPL 6927
(ASKS)





1




Environmental Report - Drilling Rehabilitation

- This report aims to show the access preparation and drill sites used for drilling in three phases: Before (untouched environment), during the execution (drilling works) and post activities (removal of equipment, collection of fluids and greases as well as cleaning and rehabilitation of the site).
- For opening of accesses and sites, priority was given to places with less vegetation (bush), sparing the medium to large trees. Access tracks were opened manually where possible, in order to avoid use of machinery that could remove the fertile soil cover and generate irregularities in the natural terrain.
- The sites followed the standard requirements of the company, with demarcation of boundaries by barricading tape; bunding (plastic protection) under the rig to avoid contamination of the soil by oils and greases, toilet placed near the rig for use by the survey team, shady tent to lunch and rest.
- Products added to water to increase viscosity are biodegradable and non-contaminating. All return tanks (sumps) were closed, top-grease material was collected and deposited at the Otavi waste disposal site.
- The recovery of vegetation will occur gradually and naturally, through grass seeds that are in the soil and should start from the arrival of the rainy season (December to February). Access tracks will be maintained for future exploration activities. It should be noted that all farmers are aware of the recovery methods used and are not opposed to these in any way.
- The owners were previously notified of the drilling activities, and according to the company's surface access agreement, they were compensated for the drill access tracks, the use of water for drilling, and the use of fire wood, water and permission to camp by the drilling team.
- Chemical toilets were used at the drilling and camping sites

2


Drill-hole site: NANAND000016 Drilled from 16 JUNE 2021 TO 10 AUGUST 2021

BEFORE




Drill-site before drilling

DURING




Drill-rig



Plastic liner - preparing sump

AFTER




Rehabilitated drill-site

3

3


Drill-hole site: NANAN000017 Drilled from 17 AUGUST 2021 TO 28 AUGUST 2021

BEFORE




Drill-site

DURING



Drill-rig, sumps and water tank

AFTER




Cleaned drill-site

4

4


Drill-hole site: NANAND000018 Drilled from 08 AUGUST 2021 TO 10 SEPTEMBER 2021

BEFORE




Drill-site before drilling

AFTER




Post drilling - cleaned drill-site

DURING




Drill rig and sumps



5


Drill-hole site: NANAND000019 Drilled from 29 AUGUST 2021 TO 19 SEPTEMBER 2021

BEFORE




Drill-site before drilling

AFTER




Post drilling - cleaned drill-site & capped hole

DURING







Drill rig, sumps & water tanks



6






Drill-hole site: NANAND000020 Drilled from 11 SEPTEMBER 2021 TO 21 SEPTEMBER 2021

BEFORE	 Drill-site before drilling	DURING	 Drill rig and sumps
AFTER	 Post drilling - cleaned drill-site & capped hole		

7

7

Drill-hole site: NANAND000021 Drilled from 23 SEPTEMBER 2021 TO 02 OCTOBER 2021

BEFORE	 Drill-site before drilling	DURING	 Drill rig and sumps
AFTER	  Post drilling - cleaned drill-site & capped hole		

8

8

Drill-hole site: **NANAND000022**

Drilled from 24 AUGUST 2021 TO 14 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig

9

9

Drill-hole site: **NANAND000023**

Drilled from 15 SEPTEMBER 2021 TO 27 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING






Drill rig and sumps



10

10





Drill-hole site: NANAND000024 Drilled from 28 OCTOBER 2021 TO 30 OCTOBER 2021

BEFORE	 Drill-site before drilling	DURING	 Drill rig and sumps
AFTER	 Post drilling - cleaned drill-site & hole capped		

11

11





Drill-hole site: NANAND000025 Drilled from 04 OCTOBER 2021 TO 27 OCTOBER 2021

BEFORE	 Drill-site before drilling	DURING	 Drill rig and diesel trailer
AFTER	 Post drilling - cleaned drill-site & hole capped		

12

12





Drill-hole site: NANAND000026 Drilled from 01 NOVEMBER 2021 TO 14 NOVEMBER 2021

BEFORE	 Drill-site before drilling	DURING	 Drill rig and sumps
AFTER	 Post drilling - cleaned drill-site & hole capped		

13

13

Drill-hole site: NANAND000027 Drilled from 01 NOVEMBER 2021 TO 11 NOVEMBER 2021

BEFORE	 Drill-site before drilling	DURING	 Drill rig and sumps
AFTER	 Post drilling - cleaned drill-site & hole capped		

14

14

ACCESS ROAD REHBILITATION

BEFORE REHABILITATION



CURRENT REHABILITATION



15

15

Drill-crew camp-site



Shower facility and chemical toilet



storage container



Camping tents

16

16

ENVIRONMENTAL REPORT (ER) (Prospecting Companies)

INSTRUCTIONS:

1. An Environmental Report shall be submitted to the Ministry of Environment and Tourism (MET) biannually. Jan to Jun and Jun to December: Please indicate:

01 July to 31 December 2020

2. This form shall be the minimum reporting format. Prospecting Companies are expected to attach a map of their prospecting area to this report. Prospecting Companies are welcome to attach any other information they like, such as copies of new agreements, letters of explanation, aerial photographs, or anything else of interest.
3. The map shall be used to indicate the following:
 - * areas where prospecting has taken place,
 - * roads or tracks made and/or used,
 - * houses and other infrastructure erected,
 - * excavations or other scars which have been rehabilitated,
 - * conflict areas, etc....
4. It is recommended (but not compulsory) that Prospecting Companies attach photographs to their report, which visually illustrate the activities described in their report.
5. Failure to submit an Environmental Report shall constitute a breach of the Environmental Contract, which could result in steps taken against the Prospecting Company.
6. All information contained in the Environmental Report shall be treated as confidential.
7. The Prospecting Company shall ensure that all the information recorded in the Environmental Report is, to their best knowledge, accurate and correct.



Completed Environmental Reports should be sent to :

**The Permanent Secretary
Ministry of Environment and Tourism
Private Bag 13306
Windhoek**

For Attention: Saima S. Angula

A. COMPANY DETAILS AND REPORTING PERIOD :

Name of Company: Votorantim Metals Namibia (Pty) Ltd

Address of Company: 9B South Port Office Park, Hosea Kutako Avenue,
P O Box 97957, Maerua Park, Windhoek, Namibia

Tel: 061-221016 Fax number: 061-231083 E-mail: efreyer@iway.na

Name of person compiling report: E E Freyer

Reference number(s) of prospecting area / block / license: EPL 6927

Geographical location of area / block / license: Grootfontein District,
Otjozondjupa Region

This report is for the period of : (tick the relevant box and fill in the year)

 January - June July - December 2020

Other (please specify)

B. POLLUTION AND WASTEHas all domestic refuse (eg. Household waste, bottles, tins, paper, plastic, etc)
been removed from the prospecting area ?yes no

If "yes" above, specify the site where such refuse has been deposited : n/a

How often is refuse removed to the site mentioned above ? : every week

every two weeks every three weeks once a month at irregular intervals

If refuse has not been removed, where has it been dumped ? Otavi municipal waste disposal site

As far as litter is concerned, would you
describe your prospecting area as :Very clean Reasonably clean Filthy

If your prospecting area is littered with refuse, please indicate how you intend cleaning it up:

Refuse and litter found in the areas that we work in is collected and removed to municipal waste-dump

Are toilets provided for all staff employed by the prospecting company :

yes no If "yes" above, are they : Flush toilets Chemical Toilets Pit Latrines Other

If chemical toilets are used, how are old chemicals disposed of :

Deposited in evaporation ponds Deposited in a municipal refuse dump Buried on site Other (specify)

C. VEHICLES AND EARTHMOVING EQUIPMENT

Indicate the types and number of vehicles and earthmoving equipment used on site during the reporting period (tick box in front of the category of vehicles used and then fill in the next boxes to indicate numbers)

<input checked="" type="checkbox"/> Pick-up trucks (“bakkies”), either 2x4 or 4x4	How many in use	6
<input checked="" type="checkbox"/> Lorries / trucks between 5 - 10 ton capacity	How many in use	2
<input checked="" type="checkbox"/> Lorries / trucks larger than 10 ton capacity	How many in use	1
<input type="checkbox"/> Bulldozer of any size	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> Road Grader of any size	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> Front-end loader of any size	How many in use	<input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/> Drilling machine of any type	How many in use	1
<input type="checkbox"/> Other (specify)	How many in use	<input type="checkbox"/> <input type="checkbox"/>

D. ROADS AND TRACKS (In addition to ticking the following boxes, please draw roads/tracks made on an accompanying map in blue ink. Roads which have been rehabilitated (ie. restored to their natural state) can be scratched out in red pen.

Have new roads or tracks been made during the reporting period ? yes no

If “yes” above, how long are these (in kilometres) ? 1.5 km

If “yes” above are these still in use ? yes no

If “no” above have any of these roads or tracks been rehabilitated ? yes no

If “yes” above, how have you done such rehabilitation ? : Ripping Raking sweeping
 Other (specify): will still be used, then left to rehabilitate naturally

If road / track rehabilitation has taken place, how many kilometres of roads or tracks have been rehabilitated ? n/a

E. TRENCHES OR PITS: If new trenches or pits were made in the site / area during the reporting period, please indicate these by ticking the appropriate boxes AND by means of illustrating them on the same map described above. New pits or trenches made, should be numbered and drawn as a CIRCLE in blue ink, while pits or trenches which were rehabilitated during the reporting period should be scratched out in RED ink.

Have new trenches or pits been excavated in your area during the reporting period ? yes no

If “yes” above, what are their approximate sizes or dimensions ? (in metres)

1. AMT / IP: 2379 holes with dimensions : 0.2m length x 0.2m width x 0.2m depth
2. Soil sampling: 908 holes with dimensions : 0.15m length x 0.15m width x 0.2m depth
3. Trench / pit No.3 : Size / dimensions : Cubic metres or length x width x depth
4. Trench / pit No.4 : Size / dimensions : Cubic metres or length x width x depth

Were any holes/trenches rehabilitated during this period of reporting ? yes (Show on map) no

F. INFRASTRUCTURAL DEVELOPMENT

Infrastructural Developments means any offices, houses, sheds, cement slabs, or other buildings or foundations for buildings. It also includes storage tanks (for water, fuel or other substances), temporary housing such as mobile homes & caravans, prefab units and tented camps. Please report on new construction or additions to buildings you reported on, in your previous Environmental Report.

Was any NEW infrastructure established during this period ? yes no

If "yes" above, is this infrastructure: Permanent Temporary A combination

Describe infrastructure by ticking boxes: Offices Housing Sheds
 Prefab structure Garages Storage tanks
 Cement slabs Foundations Other

If "other", please specify: *Tented camps (geophysical & drilling contractors' staff); otherwise staff is resident in Otavi or accommodated in a guesthouse in Otavi*

G. BOREHOLES, SAMPLE HOLES OR OTHER DRILLING

This category includes holes drilled for water, for taking mineral or other samples, for setting explosives, for testing mineral quality, or any other purpose.

Were any holes drilled during this period ? yes no

If "yes", for which purpose were they drilled ? Water depth Quantity
 Sampling depth up to 566.81 m Quantity 11
 Explosives depth Quantity

Other: n/a (specify) Total meterages: DD: 4449.43m Quantity: Diamond (core): 11 drill-holes
 List of borehole numbers and depths: *See list of Diamond (core) drill-holes attached*

H. WATER

Your estimated monthly water consumption during this period was: 376 cubm

Water was obtained from : River Borehole Dam Water Affairs Other

Please estimate the percentage of water used for the following activities during this period:

Human consumption	8	%
Toilets	1	%
Prospecting activities	<input type="checkbox"/> <input type="checkbox"/>	%
Washing vehicles & equipment	1	%
Dust control	<input type="checkbox"/> <input type="checkbox"/>	%
Building activities	<input type="checkbox"/> <input type="checkbox"/>	%
Gardens	<input type="checkbox"/> <input type="checkbox"/>	%
Recreation	<input type="checkbox"/> <input type="checkbox"/>	%
Other (Drilling)	90	%

Were there any accidents which caused a loss of water ? yes no

If "yes", please give details

I. PROTECTION OF FAUNA AND FLORA

Please answer the following questions by ticking the appropriate boxes :

Question :	Yes	No	Unsure
Were any mammals, birds, reptiles or fish killed or wounded (purposefully or accidentally) in the prospecting site or area ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Were any plants (excluding grasses) picked, damaged or removed ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was there any wood collecting in the area ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

J. RELATIONS WITH NEIGHBOURS, OFFICIALS AND/OR THE GENERAL PUBLIC

Were there any conflicts with neighbours, land-owners, Government Officials or the public during this period ?

Yes No

If "yes" above, what was the nature of these conflicts ? (tick boxes to provide answers)

People entered the prospecting area without permission or prior arrangement	<input type="checkbox"/>
Complaints about reduced access to water or other resources	<input type="checkbox"/>
Complaints about danger posed to livestock or wildlife	<input type="checkbox"/>
Allegations about stock-theft or poaching	<input type="checkbox"/>
Complaints about vehicle or equipment movement on access roads / tracks	<input type="checkbox"/>
Complaints about litter or other types of pollution (eg. noise, dust, etc.)	<input type="checkbox"/>
Complaints about the activities / actions of company staff	<input type="checkbox"/>
Allegations that the Company was not adhering to contracts / agreements	<input type="checkbox"/>
Allegations that the Company damaged property or installations	<input type="checkbox"/>
Allegations that gates were left open or unlocked	<input type="checkbox"/>
Other (specify):	

If conflicts arose, indicate how these were resolved ? (tick boxes)

Verbal agreement after discussions.....	<input type="checkbox"/>
Written agreement by special contract.....	<input type="checkbox"/>
Instructions to company staff to avoid conflicts.....	<input type="checkbox"/>
Company rectified its mistakes and undertook to avoid future wrong-doing....	<input type="checkbox"/>
Court action or other third party arbitration.....	<input type="checkbox"/>
Other (specify)	<input type="checkbox"/>
The conflicts remain unsolved.....	<input type="checkbox"/>

Any other comments or information :

.....

See next page for more space for "additional comments"

Additional comments continued

1. Some 38.4 km (25 lines) were surveyed on the farms Neuwerk, Hartebeestpoort, Askevold and Ondjondjo, using the AMT and IP survey methods. Lines (1m wide) were cut for access on foot (to lay out geophysical survey cables).

2. Some 2379 small holes (0.2 x 0.2 x 0.2m) were dug for electrodes and were closed after the AMT & IP surveys along 25 lines (38.4km).

3. Some 908 soil sampling holes (0.2 x 0.2 x 0.2m) were dug and closed after sampling (0.5kg).

4. Diamond drilling of 11 holes ((total meterage 4449.43m, max depth 566.81m) were drilled between 02/07/2020 and 16/12/2020.

5. Drill-hole lists (with positions and depths) and drilling plans are attached

Attachments to this report:

1. A drill-hole list is appended that gives the exact location coordinates, drill-hole orientation and drill-hole depths of the 11 core (diamond) holes.

2. A map that shows the locations of all drill-holes on farm Neuwerk.

3. Drill-site Rehabilitation Report for 2020.

I declare that the information provided in this Environmental Report is, to the best of my knowledge, accurate and correct.

Votorantim Metals Namibia (Pty) Ltd
 Southport, Office 9B, Hosea Kutako Drive
 PO Box 97957, Maerua Park
 Windhoek, Namibia
 Telephone Nr: +264 61 221016
 Facsimile Nr: +264 61 231083

.....
Votorantim Metals Namibia (Pty) Ltd

.....16/04/2021
Date

LIST OF DIAMOND HOLES - EPL 6927 - JUL - DEC 2020

<i>HOLE NO.</i>	<i>LATITUDE (WGS84 Zone K)</i>	<i>LONGITUDE (WGS84 Zone K)</i>	<i>AZIM.</i>	<i>INCL.</i>	<i>TYPE</i>	<i>DEPTH (E.O.H.)</i>
NANAND000005	7814700	759354	360°	-65°	Diamond (core)	200.80m
NANAND000006	7814537	759344	360°	-65°	Diamond (core)	300.00m
NANAND000007	7814683	758954	360°	-65°	Diamond (core)	230.80m
NANAND000008	7814572	758945	360°	-70°	Diamond (core)	332.77m
NANAND000009	7814284	758923	360°	-65°	Diamond (core)	560.70m
NANAND000010	7814282	758924	360°	-85°	Diamond (core)	500.77m
NANAND000011	7814282	759127	360°	-70°	Diamond (core)	566.81m
NANAND000012	7814333	759685	360°	-70°	Diamond (core)	422.72m
NANAND000013	7814240	759675	360°	-70°	Diamond (core)	560.72m
NANAND000014	7814372	759646	360°	-58°	Diamond (core)	353.62m
NANAND000015	7814436	758121	360°	-70°	Diamond (core)	419.72m

4449.43





Votorantim
Metals

EPL 6927 - DRILLING REHABILITATION REPORT
JULY-DEC 2020



Environmental Report - Drilling Rehabilitation

- This report aims to show the access preparation and drill sites used for drilling in three phases: Before (untouched environment), during the execution (drilling works) and post-activities (removal of equipment, collection of fluids and greases as well as cleaning and rehabilitation of the site).
- For opening of accesses and sites, priority was given to places with less vegetation (bush), sparing the medium to large trees. Access tracks were opened manually where possible, in order to avoid use of machinery that could remove the fertile soil cover and generate irregularities in the natural terrain.
- The sites followed the standard requirements of the company, with demarcation of boundaries by barricading tape, bunding (plastic protection) under the rig to avoid contamination of the soil by oils and greases, toilet placed near the rig for use by the survey team, shady tent to lunch and rest.
- Products added to water to increase viscosity are biodegradable and non-contaminating. All return tanks (sumps) were closed, top grease material was collected and deposited at the Otavi waste disposal site.
- The recovery of vegetation will occur gradually and naturally, through grass seeds that are in the soil and should start from the arrival of the rainy season (December to February). Access tracks will be maintained for future exploration activities. It should be noted that all farmers are aware of the recovery methods used and are not opposed to these in any way.
- The owners were previously notified of the drilling activities, and according to the company's surface access agreement, they were compensated for the drill access tracks, the of water for drilling, and the use of fire wood, water and permission to camp by the drilling team.
- Chemical toilets were used at the drilling and camping sites
- Accidents: Zero

Drill-hole site: **NANAND000005**

Drilled from 01 JULY to 10 JULY 2020

BEFORE



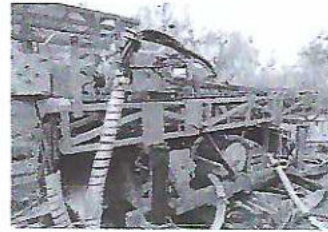
Drill-site before drilling

AFTER



Rehabilitated drill-site & capped

DURING



Drill-rig



Plastic liner - preparing sump

33

Drill-hole site: **NANAN000006**

Drilled from 12 JULY to 23 JULY 2020

BEFORE



Drill-site

AFTER



Cleaned drill-site

DURING



Drill-rig and sumps

34

Drill-hole site: **NANAND000007**

Drilled from 24 JULY to 02 AUG 2020

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site

DURING



Drill rig and sumps



6

Drill-hole site: **NANAND000008**

Drilled from 04 AUG to 13 AUG 2020

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & capped hole

DURING



Drill rig and sumps & water tanks

6

Drill-hole site: **NANAND000009**

Drilled from 14 AUG to 09 SEP 2020

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & capped hole

DURING



Drill rig and sumps



7

Drill-hole site: **NANAND000010**

Drilled from 13 SEP to 22 SEP 2020

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & capped hole

DURING



Drill rig and sumps

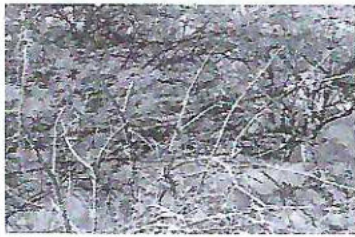


8

Drill-hole site: **NANAND000011**

Drilled from 04 OCT to 26 OCT 2020

BEFORE



Drill-site before drilling

AFTER



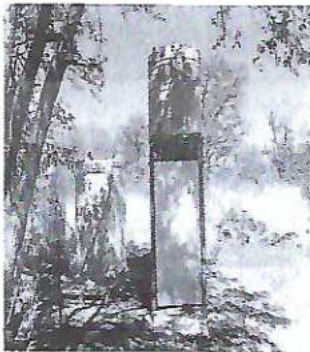
Post drilling - cleaned drill-site & hole capped

DURING



Drill rig and sumps

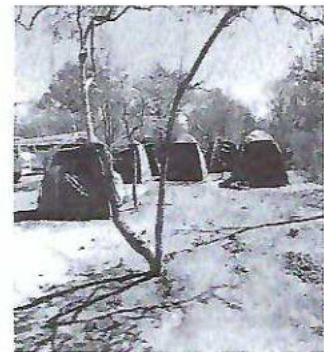
Drill-crew camp-site



Shower facility and chemical toilet



storage container



Camping tents



Votorantim

Metais

EPL 6927 - DRILLING REHABILITATION REPORT
JULY-DEC 2021

- This report aims to show the access preparation and drill sites used for drilling in three phases: Before (untouched environment), during the execution (drilling works) and post-activities (removal of equipment, collection of fluids and greases as well as cleaning and rehabilitation of the site).
- For opening of accesses and sites, priority was given to places with less vegetation (bush), sparing the medium to large trees. Access tracks were opened manually where possible, in order to avoid use of machinery that could remove the fertile soil cover and generate irregularities in the natural terrain.
- The sites followed the standard requirements of the company, with demarcation of boundaries by barricading tape, bunding (plastic protection) under the rig to avoid contamination of the soil by oils and greases, toilet placed near the rig for use by the survey team, shady tent to lunch and rest.
- Products added to water to increase viscosity are biodegradable and non-contaminating. All return tanks (sumps) were closed, top grease material was collected and deposited at the Otavi waste disposal site.
- The recovery of vegetation will occur gradually and naturally, through grass seeds that are in the soil and should start from the arrival of the rainy season (December to February). Access tracks will be maintained for future exploration activities. It should be noted that all farmers are aware of the recovery methods used and are not opposed to these in any way.
- The owners were previously notified of the drilling activities, and according to the company's surface access agreement, they were compensated for the drill access tracks, the of water for drilling, and the use of fire wood, water and permission to camp by the drilling team.
- Chemical toilets were used at the drilling and camping sites

Drill-hole site: **NANAND000016**

Drilled from 16 JUNE 2021 TO 10 AUGUST 2021

BEFORE



Drill-site
before drilling

AFTER



Rehabilitated
drill-site

DURING



Drill-rig



Plastic liner - preparing sump

Drill-hole site: **NANAN000017**

Drilled from 17 AUGUST 2021 TO 28 AUGUST 2021

BEFORE



Drill-site

AFTER



Cleaned drill-site

DURING



Drill-rig, samps and water tank

Drill-hole site: **NANAND000018**

Drilled from 08 AUGUST 2021 TO 10 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site

DURING



Drill rig and sumps



Drill-hole site: **NANAND000019**

Drilled from 29 AUGUST 2021 TO 19 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & capped hole

DURING



Drill rig, sumps & water tanks



Drill-hole site: **NANAND000020**

Drilled from 11 SEPTEMBER 2021 TO 21 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & capped hole

DURING



Drill rig and sumps



Drill-hole site: **NANAND000021**

Drilled from 23 SEPTEMBER 2021 TO 02 OCTOBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & capped hole



DURING



Drill rig and sumps



Drill-hole site: **NANAND000022**

Drilled from 24 AUGUST 2021 TO 14 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig

Drill-hole site: **NANAND000023**

Drilled from 15 SEPTEMBER 2021 TO 27 SEPTEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig and sumps



Drill-hole site: **NANAND000024**

Drilled from 28 OCTOBER 2021 TO 30 OCTOBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig and sumps

Drill-hole site: **NANAND000025**

Drilled from 04 OCTOBER 2021 TO 27 OCTOBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig and diesel trailer



Drill-hole site: **NANAND000026**

Drilled from 01 NOVEMBER 2021 TO 14 NOVEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig and sumps



Drill-hole site: **NANAND000027**

Drilled from 01 NOVEMBER 2021 TO 11 NOVEMBER 2021

BEFORE



Drill-site before drilling

AFTER



Post drilling - cleaned drill-site & hole capped

DURING



Drill rig and sumps



ACCESS ROAD REHBILITATION



BEFORE REHABILITATION

CURRENT REHABILITATION

Drill-crew camp-site



Shower facility and chemical toilet



storage container



Camping tents