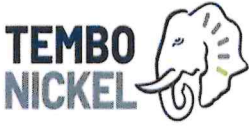
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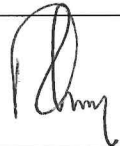
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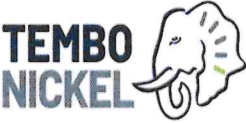
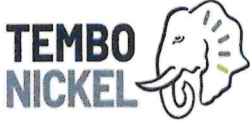

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1. INTRODUCTION

Tembo Nickel Corporation Limited (TNCL) believes that environmental protection is an important attribute of corporate leadership and is committed to applying standards of responsible environmental practice at every stage of the mining life cycle.

The purpose of the TNCL Environmental Guidelines hereinafter referred to as "Environmental Guidelines for Contractors" is to inform contractors of their environmental responsibilities and obligations when working at the TNCL project area. This will ensure that all activities conducted at the Tembo Project area are managed to the accepted environmental standards.

Various Environmental Procedures are being developed, communicated, and implemented to ensure that all activities carried out over the life of the business are managed to ensure risks to the environment are acceptable, as low as reasonably practicable and to meet the requirements of all current relevant legislation. These SOPs are hereby summarized below.

2. SCOPE AND APPLICATION

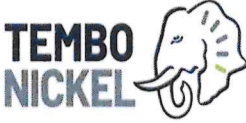
All Contractors performing work for TNCL shall use this manual as a guideline, with legally binding effect, to the extent that their specific operations or activities have an impact on the environment as provided herein.

Its prime purpose is to provide information relating to environmental standards, obligations and behaviours expected while performing work for TNCL. It also provides a detailed summary of the site policies, procedures, and other information relevant to contracting with TNCL.

3. REFERENCE DOCUMENTATION

3.1 Statutory Requirements

TNCL is required to comply with all Environmental Laws in Tanzania. These are broadly categorised into land use laws, water management laws/legislation, natural resources and conservation laws, pollution-related legislation and environmental management legislation. In the absence of suitable legislation, TNCL has committed to complying with standards of responsible environmental practice for the mining industry.

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In addition to Tanzanian legislation, TNCL is also bound to adhere to a variety of environmental guidelines developed by various organisations including the World Health Organisation and the World Bank.

All contractors shall comply with all applicable Tanzanian environmental laws bearing on the conduct of the work. They shall also comply with all environmental requirements, legal or other, affecting the Company.

Contractors shall take all reasonable precautions to Minimize the impact on the environment and shall adhere to the spirit and intent of the Company's Environmental Policy and comply with the requirements of the Company's Environmental Management System (EMS) that includes all Company policies, guidelines, procedures and work instructions about the environment.

Nothing in this manual relieves Contractors from fully understanding and complying with the health, safety and environment requirements and practices required by regulatory authorities and industry codes of practice, Acts and Regulations as administered by the Tanzanian Government.

3.2 TNCL Environmental Policy


TNCL is committed to the principle of continual environmental improvement in all its activities.

TNCL is committed to the goal of sustainable development and is working towards being a producer of sustainably sourced Class 1 nickel, copper and cobalt through hydrometallurgical processing technology which reduces emissions of carbon dioxide and sulphur dioxide to the environment.

Tembo Nickel believes that operating to leading standards of environmental sustainability by reducing our environmental footprint and impact is an integral part of our corporate responsibility. This approach enables us to: maintain our social license to operate, attract and retain the best people, identify, and act upon business opportunities, and optimise our management of risks. Tembo Nickel values are based on **SAFETY, RESPECT, HONESTY, and INTEGRITY.**

Tembo Nickel recognises that environmental excellence is an integral part of any efficient, successful and sustainable business. We are aware that our activities may cause a negative impact on the living environment and therefore Tembo Nickel and all its management will work to respect and protect the environment before, during and after our operations. We will strive for a minimal environmental footprint and to be a sustainable operation.

To achieve this Tembo Nickel will:

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- Establish, document and maintain an environmental management system with clearly defined objectives and targets.
- Ensure that the Environmental and Social Impact Statement (ESIS) commitments and principles are adhered to throughout the project's engineering, construction and start-up phases and closure.
- Minimise land, air and water impacts and conserve biodiversity through systematic environmental programs based on environmental risk minimisation and adoption during normal, abnormal, and emergency conditions.
- Integrate environmental issues into the decision-making process of all aspects of exploration, mine planning, development, operation and closure, respecting the heritage and cultural values of the Tembo Nickel community.
- Comply with all applicable laws, regulations and international standards by regularly monitoring and auditing our performance and maintaining an environmental management system based on continuous improvement.
- Involve, educate and train our employees, contractors, partners and neighboring communities in all aspects of the environment, monitoring and its management.
- Work with government and local authorities together with environmental-focused groups to develop a mutual understanding of the environmental challenges and their best solutions.
- Progressively rehabilitate all the disturbed areas to minimise the Tembo Nickel footprint.
- Empower our employees to demonstrate their commitment to sustainability and respect for the environment daily through their actions and involvement in their work.

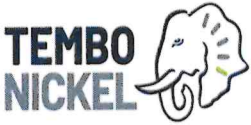
4. RESPONSIBILITIES

4.1 TNCL Environmental Team:

TNCL's Environmental Department provides an advisory service that is available to all employees, contractors, and visitors. The members of the Department are available for advice and direction on environmental issues to help the Company achieve the objectives of its Environmental Policy.

Environmental personnel on site carry out the following:

- a) Surface Water Monitoring
- b) Groundwater Monitoring
- c) Flora and Fauna Monitoring

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- d) Soils (Topsoil and Subsoils) Monitoring
- e) Air Quality Monitoring
- f) Waste Management
- g) Rehabilitation works and Monitoring.

The Department also provides a checking and auditing function for:


- a) Site operations
- b) Environmental Commitments
- c) Waste Management
- d) Environmental Management
- e) Environmental Impact and Risk Assessment
- f) Environmental Awareness and Training
- g) Environmental Incidents tracking
- h) Contractors Environmental Performance.

Current monitoring works aim at collecting all baseline information required from different areas, Water quality, Air quality and biodiversity (flora and fauna). It will also ensure that environmental impacts will be detected at the earliest stage and action taken to mitigate them.

4.2 Contractors:

Contractor Management / Supervisors are responsible within their area of operation for:

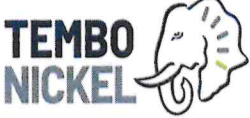
- a) Fully always comply with this procedure.
- b) Always Ensuring a clean and tidy workplace.
- c) Ensuring all statutory and project environmental rules, regulations and procedures are complied with.
- d) Conducting daily informal visual and weekly formal workplace site environmental inspections.
- e) Analysing all work activities under their control to ensure that any potential environmental hazards have been identified and controlled.
- f) Ensuring that all materials, gear, and equipment (including pollution control equipment) are provided before commencing work.
- g) Conducting toolbox meetings and file attendances.

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h) Reporting, recording, and investigating where necessary, all accidents and incidents within their work area.

4.3 General Obligations

- a) Contractor shall immediately report on the presence of, and cease work until authorized by TNCL if ecologically sensitive areas are encountered, such as cultural or archaeological sites or habitat of endangered or threatened species and report as stipulated in Chance Find Procedure (TNCL-ENV-SOP-0003).
- b) The contractor shall ensure that all work is carried out by suitably qualified and trained personnel and shall maintain on the project site identified and qualified personnel to satisfy the contractor's environmental compliance obligations. All new employees shall attend induction training and conduct a documented site orientation.
- c) The contractor shall maintain, as necessary, copies of relevant laws, regulations, and TNCL Policies and Environmental Guidelines and shall satisfy its environmental compliance obligations thereof.
- d) The contractor shall not be allowed to bring hazardous substances or waste onto the property unless essential for completion of the contract and has been communicated to the Environment department prior. To this extent, the contractor shall ensure that hazardous materials stored on the work site are properly labelled, packaged and stored as per the Chemicals and Hazardous Materials Management Procedure (TNCL-ENV-SOP-0004) to prevent the release of hazardous substances into the environment. The materials must also be accompanied by appropriate documentation (Safety Data Sheets (SDSs)).
- e) Contractor shall immediately notify TNCL of any non-compliance including release of hazardous substances and non-compliance with environmental laws or TNCL's policies and procedures including but not limited to these Environmental Guidelines.

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- f) The contractor shall properly store and/or dispose of all hazardous waste it generates in compliance with all applicable national and local laws including these Environmental Guidelines and as per Chemicals and Hazardous Materials Management Procedure (TNCL-ENV-SOP-0004).

5. CHEMICALS MANAGEMENT

All chemicals, including hydrocarbons, shall be transported, stored, handled, used, and disposed of in a safe and environmentally responsible manner and as stipulated in the Chemicals and Hazardous Materials Management Procedure (TNCL-ENV-SOP-0004).

5.1 Chemicals Selection

Contractors shall select and use chemicals with the minimum practicable safety, health, and environmental impact, whilst maintaining their effectiveness. Minimising the volumes and numbers of chemicals used is also fundamental to minimising potential impacts.


This can be achieved by ensuring that.

- a) Equipment is efficiently maintained.
- b) Equipment is in good, serviceable condition.
- c) Chemical dose rates are at an optimum.
- d) Manufacturing guidelines are followed.
- e) Adhering to the Min/Max when ordering chemicals to avoid having bulky expired chemicals.

NOTE: Refer to Chemicals and Hazardous Materials Management Procedure (TNCL-ENV-SOP-0004) for transportation, storage, use and disposal of chemicals, chemical wastes, and other hazardous materials.

5.2 Generators

All generators shall be positioned on a spill tray capable of collecting all discharges, accidental spillages and drips associated with operations and refueling.

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5.3 Refueling

The following shall be conducted when refueling the plant and machinery:

- a) The vehicle shall be attended to whilst refueling is occurring. The operator shall be in a position of control over all hoses, valves, and fittings.
- b) Prevent spillage by not overfilling tanks and replacing tank caps immediately after use.
- c) Refueling should be done on the approved impermeable surfaces to avoid spillage on to the ground
- d) The contractor shall not store the fuel for refueling (vehicles & equipment) inside TNCL premises without TNCL Safety Representative / Officer approval.
- e) The contractor shall not transport fuel on vehicles or containers not approved for that purpose.
- f) Contractors shall not use TNCL's fuel pumps unless agreed to in writing by the TNCL and contractor.

6. WASTE MANAGEMENT, HOUSEKEEPING AND HYGIENE


6.1 Waste Management:

Waste represents a major environmental hazard through its potential to impact the groundwater and surface water through pollution as well as the land through wind-blown litter. Waste management is an important function of every activity undertaken by TNCL.

Alternatives to waste disposal shall be considered for all processes and projects before their commencement. TNCL and contractors should aim to identify as many opportunities for waste minimization, reuse and recycling as possible. If you have additional ideas or comments on waste management, please contact the Environment Department.

During the performance of the work, the contractor shall keep a reasonable degree of order by disposing of accumulated rubbish and excess material. Disposal of solid wastes generated by the contractor shall be in accordance with the Integrated Waste Management Procedure TNCL-ENV-SOP-0002. No waste is allowed to go outside the mine without the approval of the Environmental Department.

At the completion of the work, the contractor shall demobilise by clearing the site of all debris,

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leftovers, tools, consumable supplies, and materials. Any site remediation required due to contractors' activities shall be his responsibility. The contractor should ensure that the area is left in a clean and perfect condition. Environmental officer will inspect the area and sign it off as all clear before the contractor hand over the premise

NOTE: All waste materials should be handled as per the Integrated Waste Management Procedure TNCL-ENV-SOP-0002.

6.2 Housekeeping

TNCL's facilities are operated on an 'around the clock' basis. The housekeeping function is incorporated into all processes, operations, tasks, and jobs. Housekeeping is not a supplement to these processes, but an integral part of them.

An industrial workplace by its very nature contains plants, equipment, tools, and machines that must be kept clean and free of rubbish (e.g.: Dust, scrap metal and timber, waste papers and liquids, etc). Waste material and rubbish shall be removed from job site areas, continuously, as the job or task proceeds.

6.3 Lay-down Yards:

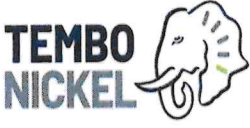
Contractors may establish lay-down yards for materials that may be of value / useful to their activities later, it is not designed as storage for scrap or junk of no value. The lay-down yard shall be inspected at least monthly by the Contractor, to ensure all materials are stored in the correct location and in an orderly fashion. Signposts shall be placed throughout the yard to ensure materials are placed in the correct locations.

NOTE: Items that are left in the yards for excessive periods shall be removed and disposed of as scrap materials.

7. WATER MANAGEMENT

7.1 Water Supply and Use

TNCL has invested considerable effort into water management on site to ensure water of an appropriate quality and quantity is supplied for consumption and site requirements. Freshwater is costly for TNCL to access, pump to site, and dispose of wastewater appropriately. We need to use

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what we have as efficiently as possible. This can be done by minimising wastage and avoiding inappropriate water use.

- a) Always use the clothes washers with a full load.
- b) Turn off all taps and never leave the tap running unattended.
- c) Minimise the amount of times equipment and buildings are washed down.
- d) Immediately report and fix any leaks from pipes and the fire system.
- e) Maintain the efficiency of all equipment.

7.2 Wastewater

Contractors shall make every effort to ensure that local streams and drains in the vicinity of their operations are not polluted through their operations.

The requirements are: -

- a) Do not hose oil or grease into waterways/storm water drains.
- b) Minimise the generation of polluted/contaminated runoff. Where possible clean areas using brooms and shovels rather than high-pressure water.
- c) Report all wastewater line leakages to the Engineering department as soon as it's observed and ensure they are fixed on time.


7.3 Liquid Effluents

All liquid effluent generated while carrying out the contracted job and related activities at the work site shall be routed to the designated drainage system.

NOTE: No liquid effluent shall be discharged to the water bodies or anywhere else in the company premises.

7.4 Vehicles / Machines Wash bays.

Vehicles and plant equipment shall only be washed and cleaned at dedicated wash bays. These bays shall be constructed out of an edged concrete pad that directs all runoff to the oil-water separators.

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When cleaning vehicles and equipment, contractors shall either utilise high-pressure steam cleaners or 'quick break' degreasers for the cleaning of equipment. Other types of degreasers will emulsify hydrocarbons and render pollution control equipment inoperative.

Wash-down bays shall be regularly maintained and kept in tidy and clean conditions.

- Use wash bays for cleaning vehicles, do not wash vehicles in streams or on bare ground.

8. LAND & TOPSOIL MANAGEMENT


It is TNCL's policy to carry out all activities in the project area with the highest regard to protecting the land. All contractors need to be aware of the effect that they can have on the land if their work practices are not properly managed.

8.1 Clearing Limits

The perimeter boundary of all areas approved to be cleared (e.g. limits of haul roads, waste dumps, ore stockpiles and associated infrastructure) shall be defined by survey and clearly delineated with survey pegs and flagging before clearing works commence. The clearing and grubbing works shall be limited to the area defined by survey pegs.

Areas to be cleared for temporary periods (<3 months) e.g. drill pads, gridlines, parking bays etc, shall be cleared of vegetation using either scrub rakes or solid blades (loader, dozer etc) positioned a minimum of 100mm above the grade. This practice will allow effective germination of seed stock and regeneration of coppicing root systems present in the topsoil. All vegetation cleared from the designated area shall be stockpiled along the perimeter of the cleared area. The topsoil shall not be removed from these areas if possible.

The topsoil shall be stripped to a minimum depth of 0.5m or as advised otherwise by the environmental personnel (Depending on the profile) and should be undertaken in dry, preferably relatively still conditions to minimise dust generation and **not too wet to avoid** compaction of the topsoil when stockpiling. Compaction results in anaerobic conditions within the stockpile causing sterilisation of a significant proportion of the seed stock within the stockpile. Environmental Department will advise where and how the topsoil will be stockpiled

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9. GENERAL REQUIREMENTS

9.1 Off-Road Vehicles Movements

The use of vehicles shall be restricted to main roads or existing tracks within the Project area. Where vehicles are required to be used in undisturbed areas for the purpose of work (e.g. exploration activities, monitoring, etc.), they should attempt to restrict their movements to main roads or existing tracks wherever possible. If access tracks or other clearings are required, approval shall be sought from the Environmental Department.

9.2 Parking Areas

Vehicles and mobile equipment are to be parked only in designated parking areas. Vegetated areas shall not be used for parking.

9.3 Fires

No open fires are permitted on the lease. BBQs are permitted provided the fire is contained, not left unattended and is extinguished before leaving the area.

Smoking is permitted in smoke designated areas only, no smoking is allowed inside the buildings.


9.4 Vegetation Management

9.4.1: Approval to Clear Undisturbed Areas

Where it is required to clear undisturbed areas, approval is required from TNCL's Environment Department before the removal of vegetation and topsoil commences. LAND CLEARANCE / TREES CUTTING / PRUNNING PERMIT: TNCL-ENV-FRM-0001 shall be filled and submitted to the Environmental Department for approval prior to any vegetation clearance.

9.4.2: Clearing Limits

The perimeter boundary of all areas approved to be cleared (e.g. limits of haul roads, waste dumps, ore stockpiles and associated infrastructure) shall be defined by survey and clearly delineated with survey pegs and flagging before clearing works commence. The clearing and grubbing works shall be limited to the area defined by survey pegs.

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9.4.3: Clearing of Vegetation and Stripping of Topsoil

Areas to be cleared for temporary periods (<3 months) e.g. drill pads, gridlines, parking bays etc., shall be cleared of vegetation using either scrub rakes or solid blades (loader, dozer etc.) positioned a minimum of 100mm above the grade. This practice will allow effective germination of seed stock and regeneration of coppicing root systems present in the topsoil. All vegetation cleared from the designated area shall be stockpiled along the perimeter of the cleared area. The cleared vegetation shall be respread over the area once it is no longer required. The topsoil shall not be removed from these areas.


Areas to be cleared for extended or permanent periods (>6 months) eg roads, waste dumps etc, shall be stripped of both vegetation and topsoil. All vegetation cleared and topsoil stripped from the designated area shall be stockpiled along the perimeter of the cleared area or removed to designated stockpile areas. The topsoil shall be stripped to a minimum depth of 0.5m or as advised otherwise by the environmental personnel depending on the profile. Stockpiled topsoil shall be used for rehabilitation works once the area is no longer required.

Topsoil stripping and stockpiling should be undertaken in dry, preferably relatively still conditions to minimise dust generation and compaction of the topsoil when stockpiling. Compaction results in anaerobic conditions within the stockpile causing sterilisation of a significant proportion of the seed stock within the stockpile. Environmental Department will advise where and how to stockpile the topsoil. All top-soil stockpiles shall be shaped to provide stable side slopes of <20 degrees and contour ripped once placement is complete.

Any subsoil removed shall, in order of priority, be used for earthworks, to fill old excavations, or deposited at the waste rock dump.

9.4.4: Large Trees

Large trees should not be cleared unless **necessary**. Advice shall be sought from the Environment Department concerning the removal of trees.

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9.5 Fauna Management

9.5.1: Native Fauna

Native fauna is protected by law. Any unauthorized killing of native fauna is prohibited.

The Environment Department shall be notified of potential or actual impacts upon native fauna and habitat areas. The Security and Environment Departments should be notified where snakes pose a hazard or threat to on-site personnel.

9.5.2: Fauna Injuries or Death

No native animals should be harmed or killed within the Project Area. Care shall be exercised when driving on roads to avoid animals, particularly at night. If animals are accidentally killed, the Environment Department should be contacted so a record can be kept. Fauna mortality incident shall be filed.

9.5.3: Wildlife observations

Contractors are encouraged to record wildlife observations within the Project Area and send these details to the Environment Department.


9.6 Air Quality Management

Emissions from TNCL's operations have the potential to impact the local air quality through dust and particulates as well as contribute to global issues such as ozone depletion and global warming through the greenhouse gas effect. Emissions on site are mainly associated with dust from vehicle traffic and exposed surfaces as well as by-products of diesel-powered equipment, drill rigs, vehicles, and generators. Contractors shall reduce the potential environmental effects of these emissions by:

- a) Effective maintenance of plants and equipment.
- b) Consideration of environmental performance at the design and purchase stage.
- c) Keeping areas regularly clean and free of dust and other windblown debris.
- d) Use of a water cart and other dust suppression methods as necessary.

10. CONTRACTOR DECOMMISSIONING, DEMOBILISATION, AND REHABILITATION

TNCL's objective at the end of operations is to remove all infrastructures no longer required and develop a stable landform compatible with the contiguous landscape, with a non-erodible surface

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conducive to self-sustaining revegetation. Rehabilitated areas are intended to provide value as a habitat for wildlife or community use.

10.1 Rehabilitation works.

All contractors at the completion of their contract shall undertake the following work to comply with TNCL's objective.

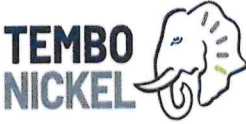
10.1.1: General Disturbed Areas

The following general procedure shall be applied when rehabilitating disturbed areas within the Project Area.

- a) Remove all infrastructures.
- b) All rubbish shall be removed from the site and taken to the waste management facility for disposal or recycling.
- c) Imported fill and crushed rock shall be removed from the area. The material shall be disposed of accordingly.
- d) All toilets shall be demolished and filled in or removed.
- e) Topsoil, if removed during the clearing stage, shall be respread over the disturbed area.
- f) All disturbed and compacted areas shall be scarified or ripped to a minimum depth of 300mm. This shall be done using mechanical means. The rip lines shall be perpendicular to any pronounced slope to avoid erosion during rainfall events.
- g) Stockpile vegetation, if present, shall be respread over the ripped site to act as a seed source and to provide some protection of the topsoil against erosion.
- h) Direct seeding of the disturbed area shall be undertaken with locally collected provenance seeds if required.

10.1.2: Borrow Pits

Borrow pits shall be rehabilitated immediately upon completion of their operation. The pits shall be well recontoured (preferably to 20 degrees) when the slope of the sidewall is greater than 30 degrees. Any cleared vegetation or topsoil initially removed from the borrow area shall be respread

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within the disturbed area prior to deep ripping (approximately 1m) along the contour. The distance between the rip lines shall be no more than 2m to 2.5m.

Direct seeding is unlikely to be required for small; shallow borrow pits or where remnant vegetation has been incorporated into the site design. Seeding using a suitable mix of provenance species may be conducted if observations show little regeneration success. Seeding should commence before the next rainy season.

10.1.3: Roads

All roads that are no longer required shall be rehabilitated. Barriers shall be installed and various points along the roads to prevent unauthorized access.

Culverts and drains shall be removed; the road shall be ripped and re-contoured to reinstate natural drainage patterns.

Where present topsoil and vegetation shall be respread across the area to facilitate regeneration.

Where revegetation is required, it should be done using native species.

10.1.4: Topsoil Stockpiles

Topsoil carries native vegetation seeds. Topsoil shall be stockpiled, and these stockpiles shall be well recontoured and preserved for future rehabilitation works.


10.2 Access to Rehabilitated Areas

All rehabilitated areas shall be clearly marked with appropriate signage, "Rehabilitated Area - No Unauthorized Access". Access to rehabilitated areas shall only be obtained with permission from the Environmental Department.

Rehabilitated areas likely to be disturbed by vehicle movements shall be fenced off to prevent unnecessary public access.

11. MINERAL EXPLORATION

This section outlines the environmental requirements specific to contractors engaged in mineral exploration. In addition to the requirements outlined below, contractors engaged in mineral exploration shall comply with the remainder of the requirements outlined in the other Sections of this Document.

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11.1 Operating Limits

The limit of the operating area shall be delineated with a continuous strip of flagging / barricade tape/net. The area shall be kept open at one end to allow access to and from the drilling site. No work shall be conducted outside the defined area.

11.2 Clearing of Vegetation and Stripping of Topsoil

Where possible areas marked for clearing (drill pads, gridlines etc.) shall be cleared of vegetation using either scrub rakes or solid blades (loader, dozer etc.) positioned a minimum of 100mm above the grade. The topsoil shall not be disturbed. This practice will allow effective germination of seed stock and regeneration of vegetation-root systems present in the topsoil after the completion of exploration activities.


All vegetation cleared from the designated area shall be stockpiled along the perimeter of the cleared area. Large trees should not be cleared unless absolutely necessary. Advice shall be sought from the Environment Department concerning the removal of large trees.

If an area is to remain cleared for more than 6 months, the topsoil shall also be stripped and stockpiled along the perimeter of the cleared area for future rehabilitation of the area.

11.3 Drill Sump Construction and Drainage

Appropriately sized sumps shall be constructed to contain and recycle all lubricating fluids and anticipated rainfall. Material removed during the construction of the sumps shall be stockpiled for rehabilitation of the sumps after use. If necessary, some of the material may be used to create a window around the edge of the sump to divert stormwater away from the sump.

Appropriately sized drains shall be constructed to divert all fluids discharging from the drill hole into the sump. The drain should contain oil/water baffles to trap hydrocarbons before the fluid reaches the sumps. Hydrocarbons trapped by the baffles shall be removed using oil-absorbent cloth regularly.

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11.4 Chemical and Hydrocarbon Management

11.4.1: Maintenance

All plants and machinery shall be well maintained to ensure fuel/oil/lubricant leaks do not occur. The cleaning of machine parts shall be done in a designated metal tray or similar, not on the ground.

11.4.2: Drilling lubricants

Drilling contractors shall use environmentally friendly or biodegradable drilling lubricants.

11.5 Post Drilling Remediation and Rehabilitation Requirements

11.5.1: Litter

All rubbish shall be removed from the site and taken to the waste disposal facility for disposal or recycling.

11.5.2: Waste Hydrocarbons

All waste hydrocarbons shall be placed in a 205L drum, sealed, and deposited at the waste oil storage area located adjacent to the diesel refueling area.

11.5.3: Contaminated Soil

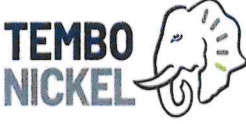
Soil contaminated with hydrocarbons shall be well stripped from the site and taken to the waste management center, at the bioremediation pads for remediation.

11.5.4: Sumps

The drilling water in the sumps shall be removed for re-use at the next drilling work. The plastic liner is carefully removed to ensure no lubrication fluids remain spill to the soil. Sumps shall be left to dry before being rehabilitated. Once dry the sump shall be refilled with the material extracted when excavating the sump. Topsoil shall be placed over the surface of the filled sump.

11.5.5: Waste Drill Core

All waste drill cores shall be properly disposed of after approval from the Resident Mines Officer (RMO).

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11.5.6: Toilets

All toilets shall be well-cleaned and moved to the next drill location.

11.5.7: Drill Holes

Completed holes shall be sealed using expanding foam or cement plugs of no less than 5 meters positioned below the topsoil layer to prevent the hole from collapsing and eroding. The sealing of the hole will significantly reduce the number of fauna fatalities down the exploration holes.

11.5.8: Rehabilitation of Disturbed Sites

The following works shall be conducted to rehabilitate the site once all infrastructures have been removed:


- a) Topsoil, if removed during the clearing stage, shall be respread over the disturbed area.
- b) All disturbed and compacted areas shall be scarified or ripped to a minimum depth of 300mm. This shall be done using mechanical means. The rip lines shall be perpendicular to any pronounced slope to avoid erosion during rainfall events.
- c) All stockpile vegetation originally cleared from the area shall be respread over the ripped site to act as a seed source and to provide some protection of the topsoil against erosion.

All remediation and rehabilitation requirements shall be completed within one month during the dry season and as soon as is practicable during the wet season. The drilling contractor shall notify the Environment department when the rehabilitation requirements have been completed.

12. SOCIAL ISSUES

TNCL considers the development of relationships with neighbouring communities as an extremely important part of its project's success and integral to the long-term future of the Company in Tanzania. It is imperative that all visitors, contractors, consultants, and Company employees have an attitude and behaviour that is always respectful and courteous towards the community.

Every effort is made by TNCL to identify and resolve areas of concern with the community before work commences in an area. If unidentified graves or other issues of cultural significance are observed, work shall cease immediately, and the Environmental Department contacted.

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13. ENVIRONMENTAL INCIDENTS REPORTING

Contractors shall report all environmental accidents/incidents as soon as they happen. By reporting these accidents/incidents, TNCL can continually develop its systems and ensure that problems are solved as or before they happen. This approach is part of our move towards continual improvement and is integral to our achieving the objectives of TNCL Environmental Policy.

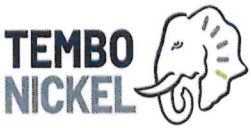
The accident/incident report form shall be used to report environmental accidents and incidents. Accidents include spillages of oils/fuel/chemicals / incorrect disposal of wastes / unauthorized clearing of vegetation and destruction of native fauna. The following lists indicate what actions would constitute an environmental accident or incident and the risk levels associated with each accident and incident. This information should be used as a guide to complete an accident/incident report form.

13.1 Accident

Refers to an undesired event that results / may result in harm to people, property damage, loss to process or impacts negatively on the environment.

Examples of negative environmental impacts:

- Chemical spillage (with or without water pollution),
- Oil or distillate spillage (with or without water pollution),
- Unauthorized damage to flora,
- Unauthorized clearing,
- Unauthorized loss or damage of culturally significant sites,
- Injury and death of fauna,
- Surface water pollution,
- Groundwater pollution,
- Dust pollution,
- Damage to natural drainage channels, and
- Non-compliance with environmental procedures and legislative requirements.

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13.2 Incident

It is an undesired event that under slightly different circumstances could have resulted in harm to people, property damage, loss of processes or negative impacts on the environment.

14. ENVIRONMENTAL TRAINING AND AWARENESS

14.1 Site induction

Before any contractor or sub-contractor commences work on-site, they shall attend the General site Induction, which includes the Safety and Environment induction program. The environmental department and contractor shall determine additional environmental training needed for the group.

14.2 Toolbox Meetings

A proportion of operational safety toolbox meetings shall be used as a forum to discuss environmental issues daily.

Supervisors shall use the time allocated to environmental issues within the meeting for the following purposes:

- a) Reinforce requirements outlined in selected environmental procedures,
- b) Discuss environmental issues affecting the team,
- c) Address areas of environmental concern raised by the workforce; and
- d) Environmental protection suggestions raised by attendees.

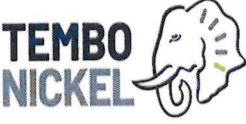
Minutes from environmental toolbox meetings shall be recorded and stored in the dedicated toolbox meeting file.

Any environmental issues arising out of the toolbox meetings shall be reported to the Environmental Department for further action or investigation where / if necessary.

15. AUDITS AND INSPECTIONS

15.1 Environmental Management System Compliance Audits

TNCL's Environment Department shall be responsible for preparing and communicating a schedule of workplace inspections/audits to be conducted by Auditors / Government Authorities / TNCL Environmental team.

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15.2 Contractor Environmental Inspections

The Contractor shall maintain a schedule of self-workplace inspections to be conducted by Contractor supervisors/representatives every month. The Contractor shall retain the copy of the completed inspection report with a set of corrective actions and make it available to the Environment Department when requested.

16. SYSTEM EVALUATION

This guideline shall be reviewed for at least after two years by members of the Environmental Department. Thereafter presented to the Standard Committee for approval, or when organizational changes take place or required as part of internal and external audits. The TNCL Document Controller will monitor compliance with the document control system on an ongoing basis.

17. DISTRIBUTION

List physical locations which require a controlled copy of this document.


Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

18. CONTRAVENTION

Any breach of this guideline shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary procedure.

19. DOCUMENT CHANGE PROCESS

The process of document change starts when the document custodian identifies there is a need to make changes within the document. The document custodian/ owner shall complete the document change request form, sign it off and submit it to the Document Controller.

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The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the Filing system ready for use by the end users.

19.1 Reason for Change

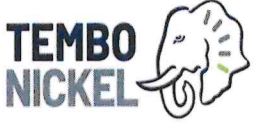
A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of risk assessments
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Changes in legislation	I	New document format
E	Changes in technology	J	To integrate special instruction into the document control system

19.2 History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer
17.01.2024	01	All pages	I	W.Nshimah
17.10.2025	02	3.1,4.3,5.3,6.1,7.3,8.1,9.3,9.4,9.5,9.6,10.2,13.2	G, I, H,	N.Eliakimu

20. RECORD CONTROL

Identification	Reference number	Responsible for Maintenance	Responsible for Filing	Location of Storage	Retention Period	Method of Disposal
Environmental Guidelines for Contractors	TNCL-ENV-GDL-0001	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic

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21. DECLARATION

I hereby declare that I have taken part in the discussion of this guideline, and I understand its contents and do commit that I shall ensure compliance hereto:

	Name and Surname	Company Number	Designation / Role	Signature	Date Signed
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