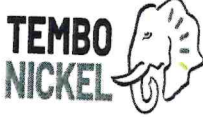
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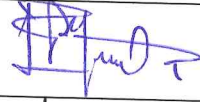
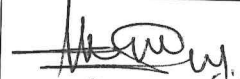





BIODIVERSITY MANAGEMENT PROCEDURE

TNCL-ENV-SOP-0001



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APPROVALS:

Title	Name	Signature	Date
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Chairperson Standard Committee	Dr Kudra Said		23/10/25
Worker's Representative	Ernest Mukaranga		22/10/2025
SHE Representative	Oscar Mutabuzi		22/10/2025
Environmental Manager	Tunzo Msuya		21/10/2025
OHS Manager	Dr Kudra Said		23/10/25
CR Manager	Moses Rusasa		23/10/2025
Project Superintendent	Michael Mhanuka		22/10/2025
General Manager	Dr Kudra Said		23/10/25

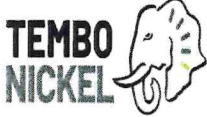
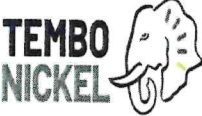
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1. PURPOSE

This procedure defines the operational requirements for the management of biodiversity to ensure the protection of flora and fauna, particularly endangered and listed species. The procedure also addresses measures that shall be observed to minimize impacts on native fauna and flora due to Tembo Nickel Project operations. Also, its Environmental commitments as stipulated in the TNCL Environmental Policy. These potential impacts may include:

- i. Loss of flora, fauna and habitats due to clearing and or exploration/mining operations,
- ii. Loss of flora, fauna and habitats due to increased vehicle activities in the area,
- iii. Potential / Actual loss of fauna, flora, and habitats due to fire,
- iv. Loss of fauna, flora, and habitats due to water and air pollution, and
- v. Unlawful destruction of native flora and fauna.

This Biodiversity Management SOP has been established as part of TNCL compliance with [TNCL environmental policy](#) and various National and International Legislative requirements including The Wildlife Conservation Act (GN 461, 2022), The National Environmental Policy (2021), Environmental Management Act (2004) [and its amendments](#), etc.

2. OBJECTIVES

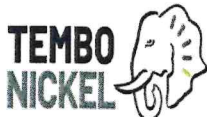
The objectives of the Biodiversity Management Procedure include the protection of natural resources (flora and fauna), in the lease area, educating employees, contractors and visitors on the importance of biodiversity conservation; and promoting awareness of the local community on the importance of conservation.

3. SCOPE

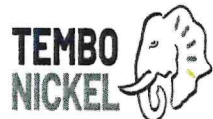
This procedure will apply to TNCL project area and covers the protection of flora and fauna whilst more effort is being focused on endangered species and risk to wildlife.

4. DEFINITIONS

Word	Definition
Aquatic systems:	<ul style="list-style-type: none"> • Marine ecosystems, life in rivers and other water system.
Biodiversity:	<ul style="list-style-type: none"> • The variety of life on our planet, measurable as the variety within species, between species, and the variety of ecosystems. • “The variability among living organisms from all sources including, inter alia, terrestrial, marine, and other aquatic ecosystems and the ecological complexes of which they are part;

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	<p>this includes diversity within species, between species, and of ecosystems.” By UNCBD</p> <ul style="list-style-type: none"> Means the variability among living organisms from sources including terrestrial ecosystems, aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, among species and of ecosystems. (EMA 2023)
Conservation offsets	<ul style="list-style-type: none"> An example of a conservation offset is a carbon offset. This is the process of reducing the net carbon emissions of an individual or organization, either by their actions, or through arrangements with a carbon-offset provider. The intended goal of carbon offsets is to combat global warming.
Ecosystem:	<ul style="list-style-type: none"> A functional unit consisting of all the living organisms (plants, animals, and microbes) in a given area, and all the non-living physical and chemical factors of their environment, linked together through nutrient cycling and energy flow. An ecosystem can be of any size log, pond, field, forest, or the earth's biosphere- but it always functions as a whole unit. Means a dynamic complex of plant, animal, micro-organism communities and their non-living environment interacting as a functional unit (EMA 2023).
Exotic species:	<ul style="list-style-type: none"> A species that did not originally occur in the areas in which it is now found, but that arrived as a direct or indirect result of human activity. Are organisms that have been introduced into an area outside their normal distribution.
Residual native ecosystems:	<ul style="list-style-type: none"> Baseline ecosystem.
Wildlife	<ul style="list-style-type: none"> The term wildlife refers to all the plants and animals on the planet that are not domesticated by humans.
Domesticated animals	<ul style="list-style-type: none"> Is a “species in which the evolutionary process has been influenced by humans to meet their needs”. By Convention on Biological Diversity.

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Conservation	<ul style="list-style-type: none"> Refers to effort to maintain and use natural resources wisely to ensure that those resources will be available for future generations.
UNCBD	<ul style="list-style-type: none"> United Nations Convention on Biological Diversity.

5. RESPONSIBILITIES:

5.1 General Manager:

- i. Ensure that adequate staff, expertise, and financial resources are available to effectively manage the environment at the exploration, construction, operation, and closure phases by license conditions, and known and anticipated environmental impacts.
- ii. Extensive involvement with line management in collectively managing environmental quality at all the stages of the TNCL project life cycle, to minimize all short and long-term impacts and risks during exploration, construction, operation, and closure phases.

5.2 Environmental Manager & Officers:

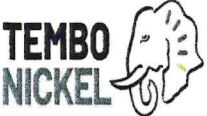
Ensure that this standard is implemented whenever wildlife and biodiversity are concerned.

Also:

- i. Ensuring that the procedure is distributed.
- ii. Ensuring that the procedure is followed.
- iii. Monitoring, evaluating and reporting environmental quality data to enable effective decisions concerning environmental management.
- iv. Develop, implement, and communicate the biodiversity management plan.
- v. Regular review of biodiversity plan to ensure its applicability to the operations activities.
- vi. Ensure that TNCL operations have a net positive impact on biodiversity.
- vii. Ensuring procedure is reviewed on time.
- viii. Promote reporting of environmental incidents that have impacts on biodiversity and ensure proper investigation is done to avoid recurrences.
- ix. *Inspect the area before clearance/ excavation and approve/ decline the clearance.*

5.3 Other Departments Managers:

- i. Ensuring appropriate training is provided about this procedure and is followed.
- ii. Ensuring that all contractors conform to this procedure.

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- iii. Ensuring that practices are conducted responsibly to adhere to requirements of this procedure.
- iv. Ensure that no clearance/ excavation is done before the inspection is done by the environmental personnel and the clearance/ excavation permit is approved

Since site clearing is unavoidable, it should be minimized, and permission should be requested from the environment department and/or responsible local authorities as appropriate before any clearance. The clearance permit (TNCL-ENV-FRM-0001, Land Clearance _Trees Cutting Permit) and the Excavation permit (TNCL-ENG-FRM-0009) should be completed and approved before commencing the work.

The security department is responsible for controlling all domesticated animals from entering the mine boundaries and facilities like the TSF, pits, and/or water ponds.

All wild animals finding their way into the mine area must be protected to the maximum achievable standards without any measure of life-threatening for the respective animals.

6. PURPOSE:


This procedure has been established as part of the TNCL biodiversity management program.

6.1 This procedure is in place to ensure that:

- i. Wild animals that find their way into TNCL project area are known to the same high protection standards as per the Wildlife Conservation Act (2022).
- ii. Where possible, land disturbances should be minimized to the most achievable level with plans for progressive rehabilitation and restoration measures.
- iii. All employees, contractors, and site visitors for TNCL do not engage in hunting and encroachment practices.
- iv. Conservation and mitigation measures are adopted in all aspects to ensure the safety and existence of the wildlife (animals, reptiles, amphibians, and birds in all mine areas).

6.2 Statutory Requirement

It is a legal requirement to ensure that Wildlife mortality is avoided, and hunting practices should never happen in the TNCL project area.


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7. PROCEDURE

The procedure addresses the following:

Avoidance of unacceptable impacts on biodiversity:

- i. Before commencing work in an undisturbed environment, a flora and fauna survey will be conducted to determine the presence of any protected or rare flora and fauna (This has been done as part of ESIA). Wherever fauna habitats are identified within the project area, it shall be marked and limit any disturbances in the area until the said fauna has been properly and safely captured and relocated.
- ii. Excluding monitoring requirements, the areas shall not be accessed without approval from the Environmental Department. Prior to any clearance, a Land clearance permit shall be filled to obtain approval from the Environmental Manager or his appointed replacement.
- iii. To avoid, minimize, or mitigate conversion of the natural habitats when establishing our operations.
- iv. To monitor land surrounding our operations to ensure that [indigenous](#) plants and animals are not disrupted by our equipment, reseeded operations, or employees.
- v. To ensure that water use, or water pumped by TNCL operations does not reduce or significantly increase flow to the extent that aquatic systems and their biodiversity are impacted.
- vi. Improvement of the biodiversity value of the TNCL Project lands by:
 - a) Protecting and managing residual native ecosystems on Project lands.
 - b) Creating riparian corridors to protect water bodies such as streams and rivers.
 - c) Maintaining connectivity within our [operations provides](#) for the movement and dispersal of plants and animals.
 - d) Minimizing pesticide use.
- vii. Seeking biodiversity opportunities by:
 - a) Investing in external conservation offsets for those portions of Project lands that did result in the conversion of native ecosystems.
 - b) Being receptive to participating in initiatives that generate biodiversity benefits at a larger scale.
 - c) Engaging the broader conservation community by seeking partnerships with [relevant stakeholders](#) to spread learning.

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7.1 Native Flora and Fauna

Native flora and fauna are protected by law. Any unauthorized killing of native fauna and deforestation of native flora by TNCL employees, visitors, and contractors is prohibited.

The following are exceptions:

- i. A wild animal may be killed if it poses an immediate danger to the safety of a human i.e., if a person attacked can do so if not, he/she should evacuate and seek further assistance— for example, a baboon attack. The approval to terminate the said animal should be sought from the environmental manager.
- ii. Deforestation of native flora should only occur in areas that are inevitable to project development to avoid the destruction, and species disturbed should be conserved, regenerated, or revegetated in other identified conservation areas.

All TNCL employees/contractors/visitors shall notify the Environmental Manager/Officer of potential or actual impacts upon native flora, fauna, and habitat areas.

7.2 Fauna Injuries or Death


All fauna injuries or deaths shall be treated as environmental incidents. Vehicle drivers shall take care when driving to prevent/reduce the number of fauna road mortalities resulting from vehicle accidents.

Animals trapped within unfenced water streams and ponds are to be rescued if it is safe to do so.

All fences, including the site boundary fence, will be inspected for fauna mortalities regularly as part of site environmental inspections and by Security.

Actions to take when a wounded or dead animal is realized on site:

- i. No effort should be made to move the carcass of the wounded or dead wild animal(s) unless their presence represents an immediate health or safety problem or interferes with production activities.
- ii. Report the incident to the environmental department with the following details:
 - a) Mortality or injury
 - b) Location of the incident

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- c) Species of wildlife involved (if known)
- d) Are there any immediate, continuing safety concerns for wildlife?
- e) Special circumstances, if any, involved in the incident
- f) Cause or possible cause of injury or mortality
- g) Date and time of mortality (if known)
- h) Date and time mortality found (if the time of mortality is unknown)

7.3 Firearms

Excluding for security purposes, the use of firearms on fauna is prohibited. The security management (Assets Protection) team is the only project staff permitted to bear arms.

7.4 Feral animals

If deemed necessary, feral animals within the Project area, such as cats and dogs, shall be trapped or baited where necessary, to control and eradicate numbers. [A permit to eradicate them should be sought from the relevant authority by the Environment Department.](#)

7.5 Monitoring and Measurement

During the establishment of the biodiversity plan, TNCL will conduct surveys and monitoring. Monitoring programs will ensure that control strategies are effective.

7.6 Endangered / Priority Listed Species

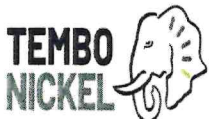
Operations will identify any endangered species that has the potential to be impacted. Means of identifying species include, but are not limited to the following:

- i. Baseline surveys
- ii. Flora and fauna monitoring
- iii. Vicinity of protected areas to the operation
- iv. Local knowledge

7.7 Operational control

Where an operation has identified a potential impact on endangered species, effective control measures will be considered, including but not limited to:

- i. Defining sensitive protected areas

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- ii. Land disturbance permits.
- iii. Fencing and signage
- iv. Reducing the speed of vehicles on roads
- v. Training and awareness of employees, contractors, and visitors

TNCL will develop programs to increase the understanding and protection of endangered species.

Monitoring programs will be put in place to assess the effectiveness of the controls implemented.

7.8 Operational risks to wildlife

Risks to wildlife include interaction with mobile machinery during operation/drilling or on access roads to the site. [Controlled](#) measures that need to be considered will include the following:

- i. Fencing
- ii. Reduction in driving speed (Including posting of driving speed limits)
- iii. Training and awareness of employees and contractors
- iv. Installation of animal bypasses

7.9 Wildlife Observations and Monitoring

A wildlife log shall be established and maintained for employees to record wildlife observations within the Project Area.


A fauna survey shall be conducted by suitably qualified professionals across the project area once every five years during operations.

7.10 Bees control

Where bees pose hazards to the workplace, the Environmental Department shall be notified to remove them through vector control officers.

7.11 Snake Observations

Direct contact with snakes shall be avoided. The Security and Environmental Manager / Officer shall be notified and act where snakes pose a hazard or threat to on-site personnel in the camp areas. Please note that the same should be applied in the field, e.g. at drilling sites.

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7.12 Pest Management

Where pest management has been identified as an issue (e.g., rats, feral cats), TNCL will implement control measures to assist in pest management. Such measures that need to be considered include the following:

- i. Trapping and killing
- ii. Prohibiting domestic animals on site.
- iii. Training and awareness of employees and contractors
- iv. Aiding conservation groups

8. REVIEW

This Procedure will be reviewed and updated whenever changes to the Sustainable development Policy, practices, Significant Environmental Risks, Objectives, and Targets, or procedures are made that may affect it. In addition, this document will be reviewed for adequacy and appropriateness at least annually and updated as necessary. All modifications will be reviewed with affected personnel, and control copies of this document will be updated.


9. SYSTEM EVALUATION

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

10. DISTRIBUTION

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

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

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11. CONTRAVENTION

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

12. 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.

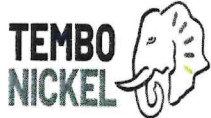
The Document controller shall issue the controlled word copy of the document to the respective document custodian/owner so that changes may be made. The document custodian/owner shall resubmit the updated document to the document controller so that the document can be controlled and updated within the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

12.1 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

12.2 History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer
20.09.2023	00	Initial Version		Digna Isdory
15.10.2025	01	1,4,5.2,7,7.1,7.4,7.8	D, E, I	Naziel Eliakimu

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13. RECORD CONTROL

Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filling:	Location of Storage:	Retention Period:	Method of Disposal:
Biodiversity Management Procedure	TNCL-ENV-SOP-0001	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic

14. DECLARATION

I hereby declare that I have taken part in the discussion of this procedure, 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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