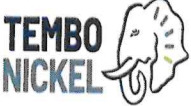
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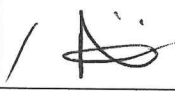


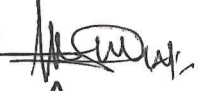


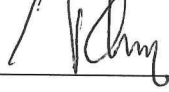



CHANCE FIND PROCEDURE

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APPROVALS:

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Engineering Superintendent	Eng. Michael Mhanuka		22/10/2025
IT Manager	Clever Mrema		23/10/2025
General Manager	Dr Kudra Said		23/10/25

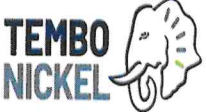
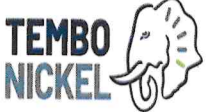
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1. PURPOSE

The purpose of this document is to provide Tembo Nickel with the appropriate response guidelines as stipulated in the Cultural Heritage Policy of 2008 section 4.6.2 which considers a Cultural Heritage Impact Assessment and states that the “*Development of the Project shall be preceded by Cultural Heritage Impact Assessment and the costs towards Cultural Heritage Impact Assessment studies will be part of the Project cost.*” Taking into consideration international best practices based on the World Bank, Equator Principles, and the International Finance Corporation Performance Standards; 1972 UNESCO Convention on the Protection of World Cultural and Natural Heritage (World Heritage Convention), ICOMOS Guideline on Heritage Impact Assessment and the Australian ICOMOS Burra Charter (1999)) that should be implemented in the event of the chance discovery of heritage resources.

These guidelines or chance-find procedures have relevance during construction and operational phases. The procedure aims to avoid and/or reduce project risks that may result due to chance finds, whilst considering international best practices.

Chance finds are defined as potential cultural heritage (or paleontological) objects, features, or sites that are identified outside of or after Cultural Heritage Impact studies, usually as part of construction monitoring. This procedure covers the following types of chance finds:


- i. Human remains.
- ii. Isolated and scattered artifact finds (cultural heritage)
- iii. Historical and structural remains (cultural heritage)
- iv. Isolated and scattered fossil finds (paleontological).

2. OBJECTIVE

To provide guidance when finding any potential heritage artifacts and structures, paleontological finds, or graves during infrastructure developments on site.

3. SCOPE

The implementation and induction of all our staff members and relevant contractors regarding this procedure will be the responsibility of the Line Management and will be assisted by Senior Site Staff in conjunction with the Training Department.

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Additional training needs will be addressed and attended to when identified to ensure that the required level of competence is maintained.

4. RESPONSIBILITIES


- i. All Line Managers must ensure that all employees, contractors, and visitors comply with this procedure.
- ii. Persons involved in the development of infrastructure, with associated site clearing and development must especially comply with this procedure.
- iii. The environmental department is responsible for record keeping of all potential and actual chance finds. These records will serve as evidence that all appropriate procedures were followed.
- iv. For large new development areas, it is the responsibility of the Project Construction Manager to make provision for a chance to find a storage area that can be used by the designated archaeologist if deemed appropriate.

5. ABBREVIATIONS

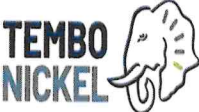
Abbreviation	Meaning
BGS	Burial Grave Site
ICOMOS	International Council on Monuments and Sites
TNCL	Tembo Nickel Corporation Limited
UNESCO	United Nations Educational, Scientific and Cultural Organization

6. DEFINITIONS

TERM	MEANING
Archaeological Site	Any place where artifacts, features, or Eco facts are found. Sites are typically assumed to be places where human activity took place in the past.

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Archaeology	The science concerned with the discovery, recovery, analysis, description, and interpretation of past remains.
Artefact	Any object which has been modified, fashioned, or manufactured by humans. These include stone tools, fossils, pots, weapons, and ornaments.
Chance Find	Cultural heritage material is encountered by chance typically during exploration or Project development and construction.
Critical cultural heritage	Consists of one or both of the following types of cultural heritage: (i) the internationally recognized heritage of communities who use or have used within living memory the cultural heritage for long-standing cultural purposes; or (ii) legally protected cultural heritage areas, including those proposed by host governments for such designation.
Cultural Resource/ Heritage/ Property	Movable and immovable objects of artistic, architectural, historical, archaeological, ethnographic, paleontological, and geological importance. This includes archaeological, paleontological, or geological sites and deposits, landscapes, and buildings.
Eco fact	Natural materials found on an archaeological site that provide evidence about the past and environments (e.g., remains of plants or animals).
Fossils	The preserved remains or traces of animals, plants, and other organisms from the remote past. Fossils include marks left behind by the organisms while they were alive, such as footprints (trace fossils).
Heritage Material	Any object/artifact that has been recovered from a site of heritage/historic significance.
Paleontological	Any fossil remains that existed as part of ancient life can be studied to indicate how animals and plants evolved from their earliest beginnings.

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7. PROCEDURE:

The following procedural guidelines must be considered if previously unknown heritage resources or BGS (Burial Grave Site) are exposed or found during the construction phase and the life of the project:

7.1 Material Discovery during the Cultural Heritage Impact Assessment

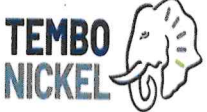
Tembo Nickel **undertook** Cultural Heritage Studies in compliance with international good practice standards and Tanzanian regulations. When a cultural heritage find is made during the assessment phase, the following procedure will apply:

- i. Once discovered, the area should be demarcated for further confirmation and action.
- ii. The clearance permit authorization should be kept on hold until the discovered materials have been investigated and action taken; accordingly, and
- iii. Initiate the process to confirm the discovery, by either using internal or external resources.

7.2 Material discovery during the construction and operation phase

Often, additional cultural heritage/paleontological finds are made during the construction phase of a project or expansion works as part of operations. When materials are discovered during construction activities, the following procedures must be followed:

- i. The areas identified to have an archaeological significance during operation will immediately be suspended from work and demarcated.
- ii. The contractor must note which type of finding he/she thinks it is and how deep the find is situated.
- iii. The contractor will notify the responsible department, in this case, the environmental department.
- iv. The contractor will move on to other work until required archaeological studies are completed and advised accordingly.

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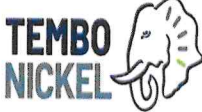
- v. The contractor shall ensure that all staff working in the field are aware of the possible archaeological remains that have been discovered.
- vi. The responsible environmental department will ensure that the area is properly demarcated, take initial photos (preferably with an object that can indicate scale, e.g. a ruler), and determine the Global Information System (GIS) coordinates of the find.
- vii. The assigned specialist / professional in the field of archaeology/palaeontology who will be available for watch and brief during early works will then be contacted to attend to the findings.
- viii. Additionally, locations of actual or suspected archaeological finds should be secured against trespass by unauthorized persons, until the archaeologist has inspected them.

7.3 Managing Human Remains Chance Finds

Human remains must be accorded full dignity and respect. If possible, burial places found should not be disturbed. However, protecting a burial from construction activities may not always be feasible. As required, the archaeologist will develop a recovery protocol that meets with the Graveyard Removal Act (No.9 of 1969) and local customs, laws, or District regulations.

The following procedures will be followed if suspected human remains are found:

- i. Work will immediately cease in the affected location.
- ii. The field supervisor will contact the environmental officer, who will in turn contact the community liaison officer.
- iii. The environmental officer will take over responsibility for the site and contact the archaeologist for further advice.
- iv. The community liaison officer will notify the representative from the community related to the place.
- v. If the area with the discovery is busy or has high public visibility, an employee will be assigned by the environmental officer to stand watch until the archaeologist arrives.
- vi. The affected area will be flagged to prevent additional disturbance. Any exposed bones will be covered with a plastic sheet, blanket, or other clean covering.
- vii. The environmental officer will collect relevant location information, take photos of the find, and complete the site recording form.

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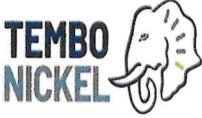
- viii. The archaeologist in consultation with the environmental officer will review the available description and images and conduct a site visit, if necessary, to develop a site management plan.
- ix. If excavated material has been loaded into a truck, it will be emptied at a nearby secure location for inspection by the archaeologist.
- x. Before continuing work in the identified site area, the archaeologist, representative from the community, and site Manager or his designate will implement any management plans that are outlined under the Graveyard Removal Act (No.9 of 1969) and local customs law or municipal/District regulations.
- xi. The Environmental Officer will report the findings, recommendations, and follow-up actions to the Project incident reporting system.
- xii. The contractor will resume work once the archaeologist/palaeontologist has completed documenting the findings and removed them from the site.

7.4 Managing Artefact Scatters

Artifact scatters occur where several related objects are found within a specific area and these sites may be extensive or localized. Human remains may also be present. If feasible, such deposits should be barricaded, and the archaeologist/palaeontologist urgently informed for recording and removal of the deposits. Or they can be capped with clean, coarse-textured fill while waiting for an archaeologist/palaeontologist. All archaeological/paleontological excavations require an Antiquities permit from the Antiquities Division, Ministry of Natural Resources and Tourism.

The following procedures will be followed in the event of chance finds of artifact scatters:

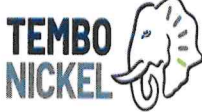
- i. Stop any work that would move or otherwise disturb the artifact or deposits at the site immediately.
- ii. The affected area will be flagged off and barricaded to prevent additional disturbance.
- iii. The field supervisor will contact the environmental department.
- iv. The environmental officer will collect relevant location information, take photos of the find, and complete the site recording form before notifying the qualified archaeologist.
- v. The archaeologist/palaeontologist who will be available for watch and brief during early works will then be contacted to attend to the findings.

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- vi. The archaeologist will review the available descriptions and images and conduct a site visit, if necessary, to develop a site management plan:
 - a) If the archaeologist advises that there are no further concerns, project activities will be allowed to resume under the original work plan.
 - b) If the original work plan can be modified and the archaeologist advises that this will create no further concerns and the modification will not cause impacts to other resources beyond the scope of the original work plan, project activities will be allowed to resume under the modified work plan.
 - c) If the archaeologist advises that the site is of archaeological concern, the environmental officer will notify the contractor not to proceed with work and inform the Antiquities Division of the find.
 - d) The archaeologist in consultation with the Antiquities Division and Project contractor will recommend interim management and follow-up actions.
- vii. Before continuing work in the identified site area, personnel will implement any management plans and/or follow-up actions as approved by the Antiquities Division.
- viii. In case excavation is required to salvage significant archaeological material, an Antiquities Permit will be required. An application for a permit will be submitted to the Director of Antiquities.
- ix. Excavated material with cultural significance must be submitted to the Antiquities Division by the archaeologist.
- x. The environmental officer must maintain a chain of custody during this process.
- xi. The environmental officer will report findings, recommendations, and follow-up actions as per the requirements of the incident reporting system.

7.5 Managing Isolated Artefacts

Single artifact finds are nearly as important as large sites for understanding the cultural significance of the project area. These artifacts are frequently easy for non-archaeologists to identify during clearing/ operations. Should an isolated artifact be observed, the procedure as per Section 5.4 above should be adopted.

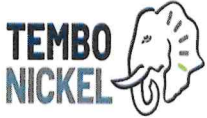
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7.6 Managing Isolated Fossil (Bone) Finds

During excavations and bulk earthworks, isolated bones and/or fossils may be spotted in the sides or bottom excavations, or as they appear on the spoil heap. If the number of distinct bones exceeds five pieces, the finds must be treated as a bone cluster.

The following procedures will be followed in the event of chance finds of fossil bones:

- i. If suspected paleontological deposits or materials are encountered, stop any work that would move or otherwise disturb the fossil or deposits at the site immediately.
- ii. The affected area will be staked or flagged off in a 30-meter radius to prevent additional disturbance.
- iii. Retrieve the isolated bone that has been exposed in an excavation or spoil heap and set aside before it is covered by further spoil from the excavation.
- iv. The site supervisor and environmental officer must be informed immediately.
- v. The environmental officer then contacts the palaeontologist for advice.
- vi. The environmental officer will take custody of the fossil.
- vii. The environmental officer will collect relevant location information, take photos of the find with a scale indication (for example a ruler), note the GIS coordinates, and complete the site recording form. The following information will be recorded:
 - a) Position (excavation position).
 - b) Depth of find in hole.
 - c) Digital image of hole showing vertical section (side).
 - d) Digital image of the fossil, with scale indication.
- viii. The fossil should be placed in a plastic bag, along with any detached fragments. A label must be included with the date of the find, position information, and depth.
- ix. The fossil must be stored at the designated, secure chance-find storage area that the Construction Manager made available.
- x. The palaeontologist will assess the information and liaise with the environmental officer and a suitable management plan will be established.
- xi. If necessary and feasible a mold and/or cast of the fossil will be taken.
- xii. Important specimens (fossils) must be submitted to the Antiquities Division, Ministry of Natural Resources and Tourism.

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- xiii. The environmental officer must maintain a chain of custody during this process.
- xiv. The environmental officer will report findings, recommendations, and follow-up actions as per the requirements of the incident reporting system.

7.7 Managing Fossil (Bone) Cluster Finds

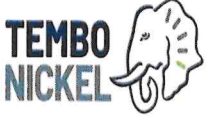
A fossil cluster is a major find of fossil: e.g., several bones (more than five) nearby or bones resembling parts of a skeleton. These bones will likely be seen in broken sections of the sides of the hole and as bones appearing in the bottom of the hole and on the spoil heap. Follow the procedure described in section 5.6 in the event of bone cluster finds.

7.8 Managing Historical /Structural Remains

These include archaeological remains materials such as ruined structures, isolated historical artifacts, and cemeteries/graves. The historical remains are easy to recognize as artifacts, but the determination of their historical significance is more difficult. Such appraisals can sometimes be made based on verbal reports, but field inspections may be required for some findings.

When historic remains cover an extensive area, the following procedures will be adopted:

- i. Work will cease in the affected location and contact the Environmental Officer who will notify the archaeologist.
- ii. The affected location will be staked or flagged off to prevent additional disturbances.
- iii. The site supervisor and environmental officer must be informed immediately.
- iv. The environmental officer then contacts the archaeologist for advice.
- v. The environmental officer will collect relevant location information, take photos of the find, and complete the site recording form.
- vi. The archaeologist will determine if the site is of historic significance.
- vii. The archaeologist will assess the information and liaise with the environmental officer to develop a suitable management strategy.
- viii. The contractor will only resume work once approval has been given by the archaeologist and environmental officer.

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8. SYSTEM EVALUATION

This procedure shall be reviewed at least 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.

9. DISTRIBUTION

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

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System

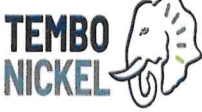
10. CONTRAVENTION

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.

11. 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.

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11.1: Reason for Change

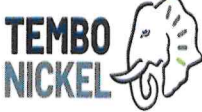
A	As a result of incidents	F	Change in training requirements
B	As a result of the audit findings	G	Results of risk assessments
C	New / changes in governance documents	H	Change due to spelling or grammatical error
D	Changes in legislation	I	New document format
E	Changes in technology	J	To integrate special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

11.2: History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer
18 th September 2023	00	Initial Release		Digna Isdory
17 th October 2025	01	7.1,7.3(X)	I, H	Naziel Eliakimu

12. RECORD CONTROL

Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filling:	Location of Storage:	Retention Period:	Method of Disposal:
Chance Find Procedure	TNCL-ENV-SOP-0003	Document Controller	Document Controller	OHS Department	Hard Copy two Years	Hard copy shared file electronic

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13. 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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