
	STANDARD OPERATING PROCEDURE	Document ID	TNCL-OHSS-HBK-0002
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CONTRACTORS HANDBOOK

TNCL-OHSS-HBK-0003



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1. ABOUT

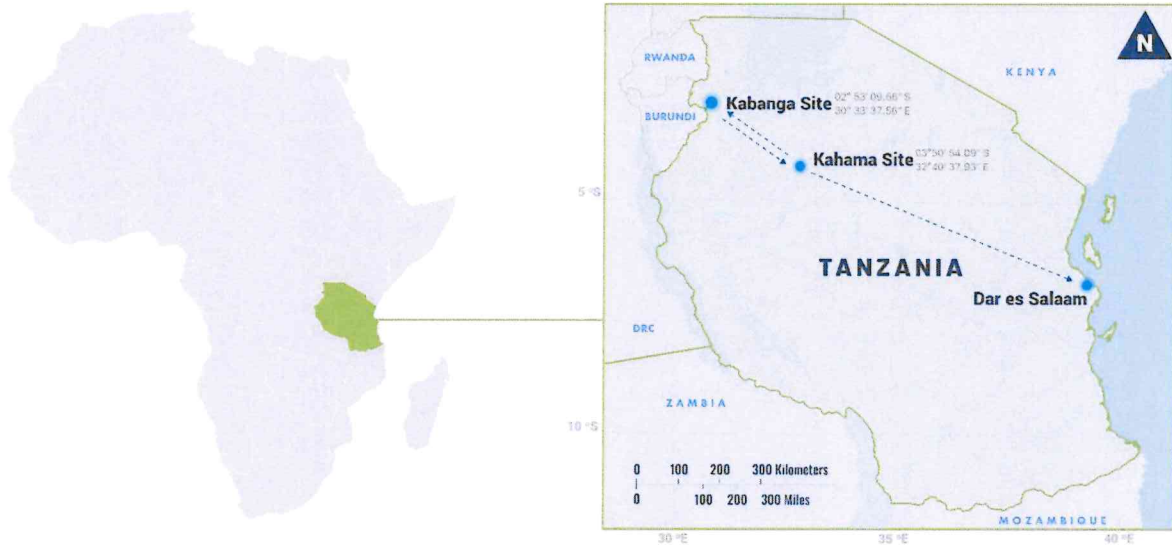



Figure 01: Kabanga Nickel Project Map Location

2. INTRODUCTION

Strong corporate governance and sustainability are essential to a company’s long-term success. More companies are now extending their commitment to responsible business practices to include their supply chain partners. Building a sustainable supply chain creates value and drives success for both businesses and society. This Contractor’s Handbook applies to the Tembo Nickel Project (“the Companies”). The Contractor’s Handbook reflects the Companies’ commitment to responsible supply chain, contractor management, governance, and sustainability. It provides suppliers and contractors with a clear understanding of the Companies’ framework for responsible business practices.

The Companies believe that the principles in this Contractor’s Handbook will support them and their supply chain partners in fostering continuous improvement, encouraging innovation, and setting strategic priorities that deliver measurable and lasting benefits to businesses, the environment, the communities in which they operate, and all stakeholders. In addition, this handbook provides a standardised process for contractor onboarding, management, compliance, and performance monitoring.

The key goals of ensuring safe systems of work, zero harm, and environmental protection are designed to build trust and confidence in our collective commitment to safety and sustainability. Clearly defining roles, responsibilities, controls, and procedures across the contractor lifecycle helps contractors feel respected and essential to maintaining our standards and success.


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This Contractor’s Handbook identifies and describes the working behaviours and safe work practices expected of all employees of the Companies, contractors, visitors, and suppliers.

This Contractor's Handbook applies to all project sites and to all persons working on or visiting the Companies' managed projects. The requirements specified in this document apply to the contractor, as well as any subcontractors, EPCM or consultants, vendors, and visitors that may be appointed by the Companies as an employer. It is the contractor’s responsibility to ensure that all subcontractors comply fully with all legal requirements, as well as the requirements of this Contractor's Handbook. This Handbook sets compliance requirements and standards and does not amend, override, or replace the Conditions of Contract unless expressly stated in writing.

They are a furtherance of the Group corporate Lifezone Metals (“the Companies”) policies and procedures.


All contractors and service providers must take careful note of these requirements and ensure they have adequate measures to comply.

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3. DEFINITIONS AND ABBREVIATIONS

3.1 Definition of Terms

Term	Definition
Company	An organization or business formed by one or more people to carry out commercial, industrial, or professional activities.
Contractor	An individual or Company that is hired to perform specific work or a project for another party, typically on a temporary, project-by-project basis, rather than as a permanent employee, handling everything from construction oversight to freelance tasks for agreed-upon compensation.
Consultant	A person who provides expert advice professionally.
Owner	A person, Company, or organization that has ultimate responsibility and authority over something, such as a project, asset, or process.
Critical Risks	Hazards with the potential to cause fatality, multiple fatalities, permanent disability, life-changing injury, or significant harm, even if they occur infrequently, require strict management through essential "critical controls".
Critical Risk Controls	Essential safety measures are designed to prevent or mitigate Serious Injury or Fatality <u>events</u> by managing the most significant hazards.
Risk Assessment	A systematic process of identifying hazards, evaluating the level of risk they pose (likelihood and severity), and putting controls in place to prevent injuries, ill health, damage, or loss.
Operation Team	The group of employees or workers responsible for carrying out day-to-day activities and tasks that keep an organization's operations running.
IFC Performance Standard	These are a set of guidelines developed by the International Finance Corporation (IFC)—part of the World Bank Group—to help companies manage environmental and social risks in their

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	projects. They are widely used by banks, investors, and companies around the world to ensure responsible business practices.
Project Owner	A person, Company, or organization that initiates, finances, and oversees a project. They are ultimately responsible for the project's success, safety, and compliance with laws and standards.
Bow-Tie	A visual risk management tool used in safety to show how a hazard can lead to an unwanted event and what controls are in place to prevent it or mitigate its consequences. It's called a "bowtie" because the diagram looks like a bow tie.
TNCL	Tembo Nickel Corporation Limited
LZM	Lifefone Metals
KNL	Kabanga Nickel Project
OSHA	Occupational Safety and Health Authority
GoT	Government of Tanzania
NEBOSH	National Examination Board in Occupational Safety and Health
PES	Project Execution Schedule
HR	Human Resources
EPCM	Engineering Procurement and Construction Management Contractor
HSE	Health, Safety, and Environment
SOP	Standard Operating Procedure
ENV	Environment
ENG	Engineering
IMT	Information Management Technology
GDL	Guideline
STD	Standard
SOW	Scope of Work
PTW	Permit to Work
IDs	Identity Card
HIRA	Hazard Identification and Risk Assessment
JSA/JHA	Job Safety/Hazard Analysis

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FLRA	Field Level Risk Assessment
LOTOTO	Lock-Out Tag-Out Test-Out Procedure
ISO	International Standard Organisation
ISO 45001	Safety Standards Management System
ISO 31000	Risk Assessment Standard Management System

4. PROJECT OWNERSHIP

The Project is owned by Tembo Nickel Corporation Limited (TNCL). TNCL is 84.0% owned by Kabanga Nickel Limited (KNL) and 16.0% by the Government of Tanzania (GoT) Treasury Registrar. KNL is 100% owned by Lifezone Metals Limited (LZM) through its wholly owned subsidiaries. The LZM-attributable ownership is 84.0%, after accounting for the GoT shareholding.

5. GOVERNANCE


We are guided by corporate governance practices that prioritize people, the planet, accountability, and stakeholder value, aligned with industry best practices and regulatory requirements.

The supplier/contractor is required to comply with all laws, regulations, standards, codes and overarching policies upon which this Contractor's Handbook is based and which the Companies expect their suppliers/contractors to take full cognizance of. As it concerns any supply relationship with the Companies, and as it pertains to their compliance with applicable statutory, regulatory and other requirements, including, but not limited to any action or inaction which reasonably may cause reputational damage to the Companies. The objective of this Contractor's Handbook is to provide a framework to all new and existing suppliers/contractors stipulating the requirements and standards for business engagement and transactions with the Companies.

For comprehensive guidelines, users should refer to the specific, detailed Policies and SOPs available in the Company-shared folder with policies, as well as the Tembo Nickel Intranet, and refer to the Tender process criteria. Or visit our website: <https://tembonickel.com/>

Hierarchy of Labour and Employment Documents

In respect of labour planning, recruitment, mobilization, expatriate engagement, localization, and workforce management, applicable to all contractors and subcontractors engaged on the Project, except where expressly overridden by applicable Tanzanian law. In the event of any

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inconsistency, the Conditions of Contract prevail over this Handbook in all commercial, cost, time, and risk matters.

6. OUR SUSTAINABILITY VISION

Our vision is to deliver a long-term supply of cleaner metals to support the global Electric Vehicle and green energy transition. The combination of our compelling technology and the world-class Kabanga Nickel asset will contribute to a more sustainable future: one that aims to eliminate smelting, thereby improving the supply chain and accelerating the green energy transition. We aim to be transparent as we play a key role in addressing urgent global issues such as climate change. We are taking the initial steps to develop an experienced leadership and project execution team equipped to set and deliver our strategy.

Making better choices for our partners, people, communities, and the environment means rights, responsibilities, and inclusion will always govern our decisions and how we grow as a Company.


7. OUR CORE VALUES

The Companies' work is guided by four key values to promote zero-harm, and Safety is our number one core value

- Safety
- Integrity
- Honesty
- Respect



Figure 02: TNCL Core Values


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8. GOVERNING LAWS

- The laws of Tanzania shall govern the Order and these Conditions.
- Employment and Labour Relations Act, Cap 366 R.E. 2025,
- Employment and Labour Relations, Code of Good Practice G.N 42 of 2007
- Occupational Health and Safety Act, No. 5 of 2023 (and Regulations made thereunder).
- Environmental Management Act, as amended in 2025
- Tanzania Mining Act, 2010.
- Core Mining Legislation.
- Tanzania Extractive Industries Act, 2015.
- Tanzania Land Act, 1999.
- Tanzania Income Tax Act, 2024.
- Personal Data Protection Act, 2022.
- Cybercrimes Act, 2015.
- Tanzania Road Traffic Act, 2023.

9. THE COMPANY'S POLICIES AND PROCEDURES, AS WELL AS INDUSTRY BEST PRACTICES

- TNCL HSE Policy.
- TNCL Environmental & Social Management Plan.
- TNCL Human Rights Policy.
- TNCL Code of Conduct
- TNCL Procurement Policy.
- TNCL Occupational Health and Safety Policy.
- TNCL Stop Work Policy.
- TNCL Alcohol and Other Drug Policy.
- TNCL HIV/AIDS and STD Policy.
- TNCL Anti-Bribery and Anti-Corruption Policy.
- TNCL Policies and Procedures to address Sexual Harassment and Discrimination.
- TNCL Information Technology Policy.
- TNCL Information and Cyber Security Policy.
- TNCL IT User Standards.
- TNCL Data Privacy Standard.
- TNCL Management of Privileged Access Rights Standards.
- TNCL Finance Policies.

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- o TNCL Contractors Management Procedure.
- o TNCL Site Access and Material Control Procedure.
- o TNCL Mobile Equipment Critical Risk Control Standards.
- o TNCL Chemical and Hazardous Material Procedure.
- o TNCL Traffic Management Plan.
- o TNCL High Occupancy Vehicle Standard.
- o TNCL Journey Management Plan.
- o TNCL Permit to Work Procedure.
- o TNCL Lock Out, Tag Out, Test Out Procedure (LOTOTO).
- o TNCL Critical Risks Control Standards.
- o this Contractor's Handbook.
- o Kabanga Site Accommodation Procedure.
- o IFC Performance Standards (PS1 – PS8).
- o The companies' Procurement Policy.

Note: The above is not an exhaustive list and applies to all TNCL procedures, standards, plans, and guidelines. The latest approved version, as issued by TNCL Document Control, applies.

Compliance with changes in law or TNCL standards after Contract signature remains subject to the Conditions of Contract change-in-law provisions


10. EXECUTION APPROACH

The Project will be executed **employing an integrated EPCM model**, comprising the Project Owner's Team, TNCL Operations Team, and an EPCM project management team led by an EPCM Programme Manager. The model defines clear roles, responsibilities and accountabilities, and ensures timely, informed decision-making between the Project Owner and EPCM organisations.

11. AUTHORITIES AND RESPONSIBILITIES

11.1 Project Owners Team

The Project Owner's Team will assume a higher-level management role, overseeing the project's overall direction, providing strategic guidance, and ensuring the EPCM Consultant's work aligns with the Project's objectives. Additionally, the team will provide technical expertise and project oversight, particularly in key decision-making areas, ensuring that the Project maintains its broader goals while the EPCM Consultant manages the operational and technical details. This clear delineation of roles ensures that the Project Owner's Team retains control

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over the Project’s strategic direction and compliance with external requirements, while the EPCM Consultant focuses on executing tasks. The team members will be located at the EPCM Consultant’s offices in Johannesburg, TNCL Offices in Dar es Salaam, and the TNCL offices at the Kabanga Site.

11.2. TNCL Operations Team

The TNCL Operations Team will manage the Mining Contractor and be responsible for ensuring that the mining targets and deliverables are achieved in accordance with the requirements of the Project Execution Schedule (PES). The TNCL Operations Team will also manage the physical resettlement of households and implement the Livelihood Restoration Plan (LRP) as it pertains to the Kabanga resettlement.

The TNCL Operations Team is responsible for interfacing with third parties, including local authorities and regulatory bodies, ensuring that the Project complies with statutory and local requirements.

The TNCL Operations Team will also oversee all project areas, HSE compliance, and enforcement. The Project Owners Team and EPCM will hand over the Project to the TNCL Operations Team once it is fully tested and commissioned.


11.3. TNCL Operations Team and the Project Owner’s Team for the Resettlement Project

The Construction Management team will oversee and coordinate the activities of the appointed contractors and supervise all construction work. This team will be led by the Construction Manager, who is responsible for overall construction operations. The Construction Manager will be supported by area-specific construction managers, each responsible for a different area.

All legal appointments will be made by the TNCL Operations General Manager, in compliance with Tanzanian mining regulations and local statutory requirements. Subordinate legal appointments will be defined and assigned to the relevant construction managers, safety managers, and supervisors.

11.4. EPCM / EPCM Contractor Team

The EPCM Contractor will be primarily responsible for managing and organising detailed engineering, procurement, and construction activities. This includes overseeing specialists within their organisation, coordinating with various suppliers, and ensuring the delivery of services, goods, and works required for the Project. The EPCM Contractor will be responsible

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for the day-to-day management of the Project, ensuring that it proceeds according to schedule and meets all technical specifications.

The EPCM Contractor Programme Manager will be accountable to the Project Director within the Project Owner's Team for the delivery of all projects.


The EPCM Contractor Programme Manager, supported by project managers and senior project controls personnel, will be responsible for coordinating and aligning the efforts of the various Contractors to ensure the delivery of individual projects in line with the safety, schedule, cost and quality requirements.

The EPCM Contractor teams will be located at home offices and in-country offices. Typically, project management and control, engineering, procurement, expediting, fabrication quality control, and logistical services will be delivered from the home office, while the TNCL team will provide in-country procurement, construction, and safety management services.

11.5. Contractors and Subcontractors

A contractor shall provide and demonstrate to the Project Owner, TNCL, and EPCM Contractor teams a suitable and sufficiently documented HSE plan, based on the relevant sections of the EPCM Contractor team's HSE specification issued as part of the tender documentation. The plan shall be applied from the commencement of construction work until the completion of the construction work.

- a. The Owner and EPCM Contractor will review the contents of the HSE plan and shall approve the implementation plan.
- b. The contractor shall ensure that a copy of the HSE plan is available on request to an employee, inspector, contractor, Owner, or Owner EPCM.
- c. Every contractor shall ensure that an HSE file, Contractor's operational file, which shall include all documentation required in terms of the provisions of the applicable act and regulations and specification, is opened, kept on site and made available to an inspector, Owner, or Owner EPCM, upon request. Refer to the Contractor Management Operational file index, **TNCL-OHS-CHK-0008-Contractors Management Pre & Post-Index Checklist** and **TNCL-OHS-SOP-0005, Contractors Management Procedure**.
- d. A contractor shall ensure that, in addition to the documentation required in the HSE Operational file, a comprehensive and updated list of all the subcontractors on site, accountable to the contractor, the agreements between the parties and the type of work being done are included and available.

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- e. Where a contractor appoints a subcontractor to perform construction work, the responsibilities and requirements as determined will apply equally to the subcontractor.
- f. Contractors shall cooperate with the Owner, or the Owner EPCM, as far as is necessary to enable each of the subcontractors to comply with the requirements.
- g. Every contractor shall, as far as reasonably practicable, promptly provide Owner, or the Owner EPCM, with any information which might affect the health and safety of any person at work carrying out project work or any person who might be affected by the work of such a person at work or which might justify a review of the HSE plan.
- h. The contractor shall establish, maintain, and ensure that all their subcontractors establish and maintain safety, health and environmental standards and systems as required, and to comply with all laws and requirements of the project HSE specifications under the contract.
- i. The contractor shall be primarily responsible for carrying out the work under the contract, having the highest regard for the **health** and **safety** of their employees, management, and persons at or in the vicinity of the site, as well as the safety of the project, temporary work, materials, and the property of third parties.

Each team position has defined responsibilities for managing safety, health, and environmental matters. Health, safety, and the environment (HSE) within the project is a responsibility of line managers (project managers, construction managers, site superintendents, area co-ordinators and supervisors). HSE practitioners are delegated supporting roles to assist managers and supervisors in fulfilling their accountabilities. All members of the management team shall acknowledge their HSE responsibilities in writing.

12. PROJECT LOCATIONS AND ACCESS ROADS

The Kabanga Nickel Project, 'The Project', can be accessed via two main access roads: the **Southern Access Road** (Murusagamba Road) and the **Northern Access Road** (Rulenge Road) via the B3 Highway along Nyakahura Junction.

TNCL Project Location and Access Roads: Contractors must follow the site traffic management plan as per **TNCL-ENG-SOP-0009, Traffic Management Procedure**, for more details

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For Contractors and service providers using the road networks, delivery vehicles must adhere to the following:

- i. Ensure that personnel under their control are made aware of the traffic rules and regulations.
- ii. Provides information when traffic rules are updated or changes are made to the document.
- iii. All Contractors and service providers must ensure that all vehicles comply with TNCL Vehicle safety standards **TNCL-OHS-STD-0013, Requirements for High Occupancy Vehicle Standard** and **TNCL-OHS-PLN-0005, Journey Management Plan**.
- iv. Contractors and service providers are to provide TNCL with the following Information and Documentation:
 - a. A weekly delivery roster detailing all planned deliveries to the respective TNCL manager/ supervisor.
 - b. A completed pre-start checklist for their vehicle before any site delivery, as per the **TNCL-OHS-CHK-0004, Light Vehicle Pre-Start Checklist**, see **Annex 1**.
 - c. A list of Drivers and assistant names, including copies of valid Tanzanian Drivers' licences and vehicle registration documents.
 - d. A detailed list of inventories/materials being delivered.
- v. Contractors and service providers shall comply with the following requirements for deliveries:
 - a. Driving at night on the Southern Access Route or the Northern Access Road is prohibited unless prior written approval is obtained from the TNCL General Manager. All deliveries shall be made between 6:00 am and 15:00.
 - b. Deliveries arriving after 15:00 will be offloaded the following day.
 - c. Any accommodation for the drivers that arrive after 15:00 will be at the contractors'/service providers' cost.

All deliveries must, as far as reasonably practical, be escorted in convoy on these routes, as per **TNCL-ENG-SOP-0009, Traffic Management Procedure**.

13. HEALTH AND SAFETY

The Project aims to achieve essential health, safety, environmental, social, technical, schedule, cost, and quality objectives. Key goals include zero fatalities, a lost-time injury frequency rate of **0.0**, compliance with Tanzanian legislation, and respect for and protection

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of human rights. All Project activities shall be conducted in a manner that safeguards the dignity, safety, and well-being of workers, communities, and other stakeholders, while minimizing adverse social and environmental impacts.

- Enforce compliance with relevant health and safety legislation and regulations.
- Work towards attaining the same health and safety goals as the Companies.
- Take ownership of and enforce compliance through an effective health and safety policy.
- Safeguard the health and safety of all stakeholders and demonstrate commitment to zero harm.
- Provide appropriate resources, training, and personal protective equipment (PPE), and stop unsafe work practices.
- Ensure work methods, risk assessments, resources, and equipment match the scope of work (SOW).
- Perform only the activities defined in the approved scope of work.
- Maintain an appropriate level of emergency preparedness to manage potential safety, health, or environmental emergencies effectively.


The Companies, therefore, require that suppliers/contractors attend Induction and Training (HSE, HR, job-specific training, and Social & Environmental).

Maintain controls and implement innovative methods to ensure compliance with associated legislation, requirements or best-practice standards (e.g., ISO 45001) and procedures the Companies may prescribe from time to time.

Suppliers/contractors must continuously ensure effective change management systems are in place to stop and reassess risks whenever planned or unplanned changes occur.

Suppliers/contractors are required to take ownership of and **actively participate** in risk **management programs, initiatives, management systems, and associated standards** (e.g., ISO 31000) to support risk-related requirements and certification.

In addition to the induction training, contractor personnel may need further social performance training. For example, security workers will require training on the **use of force and the VPSHR**. Other contractor workers may require training to ensure they understand the various standards, requirements, controls, and mitigation measures.

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13.1 Requirements for Medical Examinations

In accordance with section 36 of the Occupational Health and Safety Act No.5 of 2023, as administered by the Occupational Safety and Health Authority (OSHA), all contractors shall implement and maintain a compliant medical surveillance for their employees. Contractors, sub-contractors, and vendors must ensure that all pre-employment, periodic, and exit medicals are performed by qualified OSHA-accredited and TNCL-approved facilities and that all associated costs are to be borne by the contractors. The applicable rates shall be those prescribed by OSHA or the approved provider at the time of service. Contractors must confirm current rates with TNCL OHS before tender pricing.

Entry, exit and periodic Medical can be done on site or through OSHA, which works through its HQ in Dar es Salaam and its office in Mwanza. Bookings for Mwanza must be made through their Dar Es Salaam Office.

Medical examination costs shall be borne by the Contractor at rates prescribed by OSHA or approved providers at the time of service.

Contact

Talk to support

+255 (0) 22 2760548, 0800110091/2

Email: info@osha.go.tz

Address

Dar es Salaam

Plot No. MNY/KMB/565,

Mahakama Road – Kinondoni


P.O. BOX 519, Dar es Salaam,

TANZANIA

Contractors are further required to maintain confidential medical records and present a valid medical fitness certificate to the Client/Owner. No employee shall be permitted to perform work unless proof of medical fitness has been presented.

Periodic medicals shall be undergone by all employees who have been employed on the project for a period of more than twelve (12) months or as defined by the appropriate code of practice.

Retention monies will be withheld if the exit medical is not completed for all employees. Proof of employees' exit medicals must be provided to the Owner or the Owner's EPCM within

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fourteen (14) days of employees' demobilization or release from the project. Retention withholding shall apply strictly in accordance with the Conditions of Contract.

Note: Expatriate Medical Requirements – Onboarding Guideline

Purpose

To ensure all expatriate employees meet the Company’s medical and occupational health standards before onboarding.

Requirement Overview

All expatriate medical examinations must be completed offshore and shared with the TNCL Occupational Health Practitioner for review and written acceptance prior to mobilization. Offshore clearance does not replace any statutory, entry, or project medical requirements that may apply in Tanzania or at site; TNCL may require additional confirmation or examinations by the Project-approved medical provider where justified.

Note: TNCL reserves the right to reject any falsified or fraudulent medical certificates. All associated repatriation costs shall be borne by the Contractor.

Practitioner Certification

Employees are required to provide **official proof of certification** for the occupational health practitioner who conducted the medical examination.

Acceptable proof may include:

- A valid license or registration certificate.
- An official letter confirming the practitioner’s occupational health certification.
- Any government-issued verification of the practitioner’s qualifications.

Submission of Documents


Employees must submit all required medical documents and certification proof to the TNCL HR and OHS Team Onboarding team **before travel arrangements or mobilization** can be confirmed. Offshore expatriate medicals must be reviewed and approved by the TNCL Occupational Health Practitioner and do not replace any on-arrival statutory medicals where required.

Non-Compliance

Failure to comply with these medical requirements may result in:

- Delays in onboarding
- Suspension of mobilization or travel

Possible withdrawal of the employment offer, depending on circumstances

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Physical & Clinical Examinations Standard for Expats (certified medical copies)


- Full physical examination
- Height & weight measurements
- Blood pressure
- Eye test
- Hearing (audiometry) test
- Chest X-ray
- Lung function/spirometry test
- Urine tests
- Blood tests
- Drug and alcohol screening (multi-drug test/cannabis test)
- Patient medical history
- Family medical history
- Detailed occupational history

Further details are available in TNCL Medical Examination Guideline TNCL-OHS-GDL-0002, Pre-Employment Medical Examination Guideline, and **TNCL-OHS-SOP-0016, Medical Surveillance Program Procedure_REV01.**

13.2 Site Onboarding

The mobilisation and onboarding requirements listed in this Contractor's Handbook are complete and mandatory for all contractors and subcontractors. Contractors shall allow for full compliance in their tender pricing and mobilisation planning. No requirement in this section is optional unless TNCL issues written approval stating otherwise.

- a. Medical Examination.
- b. Verification of qualifications of the supplier's/ contractor's employees before coming onto the site, and criminal records verification.
- c. Company Registration, OSHA license.
- d. OSHA Equipment Inspection.
- e. Fire Project Registration.
- f. Tax Clearance.
- g. Competency certificates, training records, and equipment certifications.
- h. Environmental Compliance Declaration.
- i. All HR mandatory requirements as defined in the HR and Employment section of this Contractor's Handbook.

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j. Contractors' insurance coverage. The Supplier/Contractors, and or Subcontractors shall take out and/or maintain, for the duration of the contract, the insurance policies specified, including contractors all risk (CAR), public liability (PL), professional indemnity (PI) (if required) workers' compensation (WC) and medical evacuation insurance. Specific details regarding the contractor's insurance requirements can be found in the Request for Tender (RFT) package.

k. CRB Project Registration.

**** NOTE: Inductions and training may take up to three (3) days to complete. Security site clearance will only be granted upon full completion of the induction and training requirements. *****

13.3 Appointments

As a minimum, the following appointments must be completed prior to any work being carried out:


- o Subordinate manager/Contractor site agent.
- o Assistant to the manager/Contractor supervisors.
- o HSE practitioners.
- o Health and safety representatives.
- o Operators of machinery.
- o First aiders.

Every contractor will have a full-time, competent employee appointed by the Owner (TNCL) General Manager in writing as the Construction Supervisor/Site Manager. This person may not be responsible for more than one site at a time, unless assistant supervisors are appointed on all sites concerned or as directed by the General Manager.

13.4 Contractor HSE Practitioners

Contractor HSE Practitioners shall:

- a. Implement and maintain the approved Project HSE Management Plan on site.
- b. Advise site management on HSE risks, controls, and corrective actions.
- c. Report to the Project HSE Manager and act under their delegated authority.
- d. Promote and enforce a culture where HSE is paramount and uncompromised.
- e. Drive workforce engagement and accountability for HSE performance.
- f. Ensure unsafe acts are eliminated and unsafe conditions corrected promptly.
- g. Lead, participate in, and close out all incident and accident investigations.
- h. Ensure all required Risk Assessments and pre-work assessments are completed, reviewed, communicated, and complied with, verified through routine site inspections.


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- i. Ensure HSE information boards are established and maintained at all work areas.
- j. Ensure legal and regulatory HSE compliance.
- k. Coordinate daily HSE reporting and compile a consolidated weekly HSE performance report.
- l. Coordinate medical response, injury reporting, and return-to-work processes.
- m. Verify inspection, control, and safe use of tools, plant, and equipment.
- n. Review and sign off Risk Assessments prior to submission to the Owner or Owner's EPCM.

13.5 Minimum Training and Experience Requirements

- a. Bachelor's Degree/Diploma in Occupational Health and Safety, Environmental Science, Engineering, Geography and Environment or related field.
- b. Certificates in National Occupational Safety and Health Course (NOSHC Levels 1&2) from OSHA.
- c. Training regarding applicable legislation such as First Aid, Fire Safety, Hazard Identification and Risk Assessment (HIRA), Audits and incident Investigation.
- d. ISO 45001: standard knowledge.
- e. Basic computer skills.
- f. Valid Tanzania Driving License as an added advantage.
- g. SAMTRAC / COMSOC2/ NEBOSH Certificates as an added advantage.
- h. For Senior Contractor HSE Practitioner, the minimum requirement should be NEBOSH.

****NOTE: All acting appointments must be approved by the Site General Manager and shall be valid for a maximum period of three (3) months. It is the responsibility of the contractor to ensure a timeous appointment.**

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14. TRAINING

All employees shall have training appropriate to their appointment, and Job-specific requirements shall be made available for inspection by the interested parties.

The Owner or the Owner EPCM will require proof of all necessary training certificates and formal training certificates before site establishment, based on the employee's job description and occupation.

It will remain the contractor's responsibility to ensure that certificates presented as proof of competency have been verified and are valid for the occupation in which the employee is employed.

The contractor shall ensure that all his employees and his subcontractors' employees working on the site are adequately trained in the type of work to be performed, are trained in relevant procedures, have the appropriate qualifications, certifications, site induction permits, and are under competent supervision. Records to be maintained on site of appropriate training and qualifications of all employees by each contractor and will be submitted to the Owner as part of the employee's personal file at the commencement of duties.


The main contractor and all contract employees shall be holders of current certificates or licenses where the operation being performed requires them (for example, crane driver's certificate, rigger's certificate, scaffold erector's and supervisor's certificate, welding certificate, etc.). Accredited training providers will provide all training where unit standards exist.

Certificates of training and/or a competency certificate shall be submitted to the induction centre for each employee, along with a job specification.

All operators of mobile equipment shall hold a provincial license appropriate to the type of machinery they operate. For mobile machinery that cannot be registered for use on a public road, a minimum Tanzanian driver's licence is required.

All site access permits are issued through the TNCL Training Department. Only permanent TNCL employees and permanent/long-term contractor employees will be eligible to apply for a site driving /operation permit.

Before issuing a site access permit, the TNCL Training Department will determine if the applicant is competent by ensuring that:

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Training on Standard Operating Procedures (SOPs) and Risk Assessments at TNCL is structured to ensure that every worker understands the specific hazards, controls, and safe work methods relevant to their assigned tasks. Job-specific training is determined through a systematic review of the worker's role, the tasks they will perform, and the associated risk assessments, including Job Hazard Analyses (JHAs) or Task Risk Assessments (TRAs). This process ensures that training is proportional to risk, competency-based, and aligned with statutory requirements, site rules, and company standards. No person is permitted to undertake work unless they have successfully completed the required SOP and risk assessment training relevant to their job scope.

14.1 Job-Specific Training Determination – Process Flow

Step 1: Role and Task Identification by the Contractor

Identify the employee's job title, work location, and specific tasks to be performed.

Step 2: Hazard and Risk Review

Review applicable site risk assessments (HIRA, JHA, TRA) linked to those tasks.

Step 3: SOP Mapping

Match each task to the relevant approved SOPs and safe work instructions. on the approved SOP Training Matrix. If a Risk assessment and SOP are not available, the contractor must develop the RA and SOP and follow the standards committee's approval procedures.

Step 4: Training Needs Analysis (TNA)

Determine mandatory training based on:

- Risk level of the task
- Legal and regulatory requirements
- Company and site rules
- The worker's existing competency and experience

Step 5: Training Delivery


Conduct training through induction and the TNCL training centre classroom sessions are mandatory, continuous training, including toolbox talks or on-the-job instruction, as appropriate.

Step 6: Competency Verification

Assess understanding through a formal assessment. practical demonstration, questioning may also be necessary.

Step 7: Authorization to Work

The Training Accessor confirms competency and formally authorizes the worker to perform the task.

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Step 8: Records and Review

Training records are retained, and refresher or additional training is triggered by:

- Changes to SOPs
- Introduction of new equipment or processes
- Incident findings or risk reviews.

For Further requirements for the Owner or the Owners' EPCM, refer to TNCL-OHS-STD-0006, Mobile Equipment Critical Risk Control Standard; TNCL-ENG-SOP-0012, Light Vehicles Procedure; TNCL-OHS-STD-0013, Requirements for High Occupancy Vehicles; and **TNCL-OHS-GDL-0006, Health and Safety Requirements for Contractors Guidelines.**

15. MANUFACTURERS AND SUPPLIERS' DUTY FOR HEALTH AND SAFETY


Manufacturers, designers, importers, suppliers, erectors, and installers of articles, structures, or hazardous substances for use at a mine shall, as far as reasonably practicable, ensure that such articles, buildings, structures (including temporary works), and substances are designed, manufactured, constructed, installed, supplied, and used in accordance with best practice and applicable regulations, are safe and without risk to health and safety when properly used, and incorporate appropriate ergonomic principles. This duty may be limited where the recipient provides a written undertaking to implement specified measures to ensure safety and regulatory compliance. Suppliers of hazardous substances shall further ensure safe handling, storage, transport, and disposal, and shall provide adequate information on use, risks, controls, exposure limits, emergency procedures, and waste management to ensure protection of health and safety throughout the substance lifecycle.

16. RISK AND CHANGE MANAGEMENT

It is a legal requirement that all employees be informed about the health, safety, and environmental hazards in the workplace.

Every contractor performing project work shall adopt a layered approach to Risk assessments (RAs), and before the commencement of any work and during work, cause a series of RAs to be facilitated by a competent person appointed in writing and the RA shall form part of the HSE plan to be applied on the site and shall include at least:

- The identification of the risks and hazards to which persons may be exposed.
- The analysis and evaluation of the risks and hazards identified.
- A documented plan of Safe Operating Procedures (SOPs) to mitigate, reduce or control the risks and hazards that have been identified.

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- A risk and hazards monitoring plan.
- A risks and hazards review plan.

A contractor shall ensure that a copy of the RA is available on site for inspection by an inspector, Owner, EPCM, contractor, employee, representative of a trade union, health and safety representative or any member of the health and safety committee.

A contractor shall consult with the health and safety committee or, if no health and safety committee exists, with a representative group of employees, on the development, monitoring and review of the RA.

A contractor shall ensure that all employees under his or her control are informed, instructed, and trained by a competent person regarding any hazard and the related work procedures before any work commences, and thereafter at such times as may be determined in the RA.

A contractor shall ensure that all subcontractors are informed regarding any hazard as stipulated in the RA before any work commences, and thereafter at such times as may be determined in the RA.


A contractor shall ensure that, as far as is reasonably practicable, ergonomic-related hazards are analysed, evaluated, and addressed in the RA.

Notwithstanding the requirements set out above, no contractor shall allow or permit any employee or person to enter any site unless such employee or person has undergone HSE induction training regarding the hazards prevalent on the site at the time of entry.

A contractor shall ensure that all visitors to a construction site undergo an HSE induction on the site's hazards and are provided with the necessary PPE.

Every employee on site shall-

- a. Have valid proof of HSE induction training conducted by a competent person before the commencement of any work, in the form of an induction authorization card. The card shall be valid for one (1) year and subject to annual renewal. **Any individual found on site without valid proof of HSE induction shall be removed from the site.**
- b. Carry the proof for the duration of that project or for the period that the employee shall be on the project site.
- c. The process intends to achieve zero harm through the reduction of unsafe acts and conditions on the construction site through the assessment of the risk of each operation

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executed by the contractor and the provision of the necessary means to eliminate or minimize the risk to ensure a healthy and safe working environment.

- d. RAs shall be carried out and approved by the TNCL OHS team or the Owner EPCM OHS Team before commencement of any activity.
- e. The process involves input from the site manager, contractors, HSE practitioner, supervisory staff and specialist artisans for the task and the health and safety representative for the workplace concerned. Additionally, operation-specific SOPS and RAs are required for certain tasks throughout the project.
- f. The methodology used by the contractor to assess safety risks associated with his activities shall be submitted to the TNCL team or the Owner EPCM for approval.

The methodology shall consider the following, among others:

- o Legal Requirements.
- o Responsibilities.
- o Planning.
- o The Layered RA Approach.
- o Hazard and Risk Identification.
- o Risk Evaluation.
- o Preventive and Corrective Control Development.
- o Monitoring and Review.

Where applicable, the Owner standardised risk matrix will be used to develop all project RA, ensuring consistency and comparability of the identified risk.

17. RISK RATING METHODOLOGY FOR ALL CONTRACTORS AND SERVICE PROVIDERS


To categorise a risk, following its identification, the risk must be assigned a rating based on a '5 × 5' severity matrix.

Each risk must be scored separately on a scale of 1 to 5 for likelihood and impact. The likelihood rating is multiplied by the impact rating to yield an overall risk rating.

The overall risk rating enables the risks to be rated for severity.

An overall risk rating is assigned to each specific risk, with the following ranges noted:

- o Low Risk – Overall rating of 1 to 5 (**Green**).
- o Moderate Risk – Overall rating of 6 to 9 (**Yellow**).
- o High Risk – Overall rating of 10 to 15 (**Orange**).

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- Catastrophic Risk – Overall rating of 16 to 25 (**Red**).

		Consequence					
		Negligible	Minor	Moderate	Major	Critical	
Likelihood	Very likely >80%	5	10	15	20	25	5
	Likely 50 - 80%	4	8	12	16	20	4
	Possible 25 - 50%	3	6	9	12	15	3
	Unlikely 10 - 25%	2	4	6	8	10	2
	Rare <10%	1	2	3	4	5	1
		1	2	3	4	5	

Risk Rating	
16-25	Catastrophic
10-15	High
6-9	Moderate
1-5	Low


Figure 04: Risk Assessment Matrix Table.

18. TNCL GENERAL SITE RULES

All contractors and/or subcontractor personnel must:

1. Undergo a contractor engagement process before commencing work. (Contractors Management Pack).
2. Must have a medical fitness certificate.
3. Attend site induction and daily safety briefings (toolbox talks).
4. Complete the field-level risk assessment or JSA before starting any activity.
5. Follow all signage, traffic rules, and emergency procedures.
6. No alcohol, drugs, misconduct or weapons, violence on TNCL property.
7. Keep work areas clean and organised.
8. Report all unsafe acts, conditions, or equipment immediately.
9. Always wear the correct PPE.
10. Only authorized and licensed employees may operate equipment.
11. Never tamper with or remove any safety equipment or guards. Do not attempt to fix defective equipment unless you are competent and authorized to do so.
12. Never enter an unauthorized area or a lifting exclusion zone; no work is permitted under any suspended loads.
13. Never approach moving machinery; maintain a safe distance.
14. Always use dedicated walkways.
15. The taking, possession, or distribution of photographs and videos of any works, operational activities, facilities, equipment, or site areas is strictly prohibited without the prior written approval of the General Manager.

Note: For the site, Golden rules, please refer to document number TNCL-MGT-MEMO-0010, Kabanga Project Golden Rules.

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These Golden Rules (the “Rules”) are issued by Kabanga Nickel Limited (KNL) and Tembo Nickel Corporation Limited (TNCL) for the Kabanga Nickel Project, hereinafter known as the Company.

These Rules sit under and must be read with the Lifezone Metals Group Code of Conduct and the Lifezone Metals Human Rights Policy Statement (together, the “Group Policies”). These Rules set minimum non-negotiable controls for Project work and site access. Where the Group Policies set a higher standard than local practice or custom, the Company seeks to apply the higher standard to the extent permitted by Tanzanian law. If there is any uncertainty or potential conflict between these Rules, the Group Policies and Tanzanian law, the matter must be escalated immediately as follows: (a) in the first instance, to the TNCL Site General Manager and, where applicable, the TNCL Legal Counsel, who will seek to resolve the conflict in accordance with Tanzanian law; and (b) where the matter remains unresolved, to the Group General Counsel. Nothing in this escalation process shall delay or suspend compliance with any safety-critical requirement or any obligation imposed by Tanzanian law. Safety-critical instructions from TNCL site management shall be followed immediately, without awaiting resolution of any legal uncertainty.

19. PERMIT TO WORK (PTW) PROCEDURE

The following activities require a PTW:

- a. Hot Work.
- b. Confined Space Entry.
- c. Excavation.
- d. Working at Height >1.8 m. (which requires Working at Height training and the use of an approved safety harness).
- e. Electrical Work.
- f. Lifting Operations.
- g. Hazardous Chemical Handling.
- h. Bush Clearing/Tree Cutting
- i. Land Access Permit.

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Process Flow for PTW: Contractor requests PTW with method statement & JSA.

HSE reviews and approves controls.



Area TNCL/Owner/Agent Manager authorises PTW.



Work begins only after a full briefing.




PTW remains active and visible



Work stops immediately if conditions change.



Close-out inspection performed.

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20. TNCL CRITICAL RISK CONTROLS

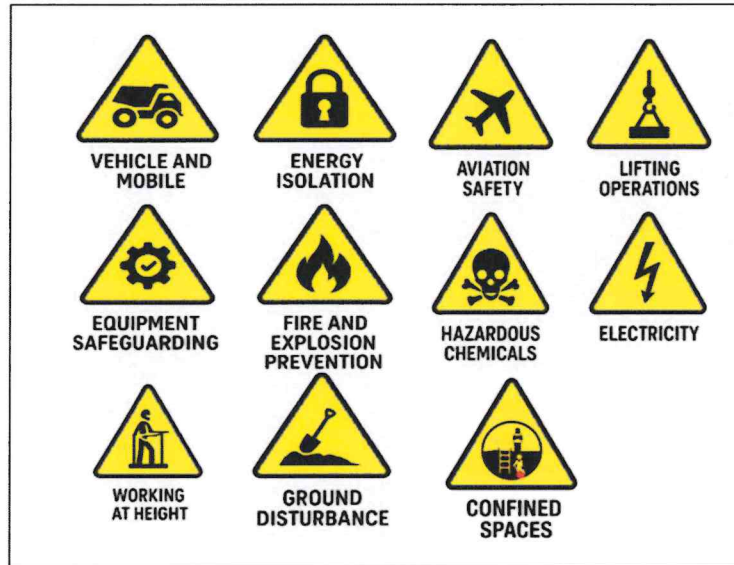



Figure 05: TNCL Critical Risks.

All Contractors are to know, identify, control, and continuously monitor all the Company's major risks and hazards/hazards and their associated Critical Risk controls, to prevent and mitigate high-consequence events that could result in serious injuries, fatalities, multiple fatalities, disabilities, major environmental harm, or significant asset damage. TNCL Critical controls are identified through structured assessments such as HIRA, JHSA, FLRA, and Bow-tie analysis and represent the last and most important barriers between hazards and major incidents. All contractors shall effectively apply, manage, and monitor the TNCL critical risk controls within their scope of work to ensure their effectiveness. Any deviation, failure or absence of critical risk control will be treated as a serious event that will trigger immediate corrective action and TNCL Management attention.

21. ELECTRICAL SAFETY PROCEDURE

- a. Only licensed electricians may perform electrical work.
- b. Lockout/Tagout must be applied before maintenance.
- c. Tools must be inspected regularly.
- d. Keep safe distances from overhead and underground lines.
- e. No metal ladders near energised systems.
- f. Report all defects immediately.

Refer to **TNCL-ENG-SOP-0003, Lockout, Tagout, and Test Out Procedure.**

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22. MOBILE EQUIPMENT MANAGEMENT

All contractors' plants / Mobile equipment coming to the site must be equipped with the following minimum safety specifications:


- a. Seat belts for all occupants.
- b. Isolation/lockout points to prevent inadvertent starting or articulation.
- c. Automatic backup alarm.
- d. Chock blocks for rubber-tired mobile equipment.
- e. Signage on the equipment that allows clear and easy identification from a distance.
- f. Reflective taping.
- g. Means of radio communication with other mobile equipment and light vehicles.
- h. Certified roll-over protection.
- i. A minimum of two 9 kg fire extinguishers; and
- j. Fitted with a fire suppression system that can be activated from both the ground and cabin levels.

Underground mobile equipment shall have the following minimum safety specifications:

- a. Fail-safe brakes.
- b. Beacon or flashing light.
- c. A means to automatically immobilise the equipment in the absence of an operator.
- d. Design, selection, maintenance, and use criteria shall be in place for all remote-controlled equipment.

All Contractors and or Subcontractors must:

- a. Ensure that all plant and mobile equipment is inspected and approved by an appointed, competent TNCL representative in accordance with the approved pre-use and statutory inspection requirements. Daily pre-use inspections shall be conducted using the relevant TNCL Engineering inspection checklist (e.g., TNCL-ENG-CHK-0046: Pre-Use Inspection Checklist for an Excavator, as shown in Annex 2), and monthly and quarterly inspections shall be conducted by the TNCL Engineering Department. A quarterly inspection licence sticker shall be issued following successful inspection and approval.
- b. Conduct and record daily pre-start checks before operation.
- c. Install operational IVMS in all vehicles (U-track or as specified by the client).
- d. Follow the Company's speed limits.
- e. Use only certified operators.
- f. Maintain records of inspections.

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- g. Never use mobile phones while driving.
- h. Always wear seatbelts.
- i. All plant and equipment must be fitted with lockout devices
- j. All plants and mobile equipment shall undergo a Simret Brake Test quarterly. In addition, all plant and mobile equipment shall undergo a brake ramp test every morning as part of the pre-start inspection.



Figure 06: TNCL Mobile Equipment's Inspection Sticker

For further information, refer to **TNCL-OHS-STD-0006, Mobile Equipment Critical Risk Control Standard.**

23. SAFETY SIGNAGE REQUIREMENTS

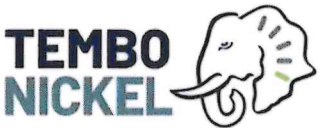
All Contractors and or Subcontractors are to comply with:

- a. Mandatory Signs (**Blue**).
- b. Warning Signs (**Yellow**).
- c. Prohibition Signs (**Red**).
- d. Emergency/Information Signs/Direction (**Green**).

All workers must recognize the meaning of signs, comply with sign requests, and respond accordingly to minimize the likelihood of loss or injury.

24. STOP WORK AUTHORITY

TNCL-OHS-SOP-0015, Stop Work Authority Procedure, empowers all employees and contractors to stop any task or operation that appears unsafe or poses potential risk to people, equipment, or the environment. Every contractor has the responsibility and the Owner's full support to stop work immediately, without fear of blame or punishment, until the hazard is assessed and controlled. Consider stopping when:

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- a. A control is missing.
- b. Conditions become unsafe.
- c. Personnel are at risk
- d. The equipment is faulty.
- e. You're not ready for work
- f. Noticing any danger

There is zero retaliation for exercising stop-work authority.

25. RECORD AND PERFORMANCE

All Contractors and/or Subcontractors must comply with the **ISO 14001 Document Control Standards and Procedure.**


Mandatory records include, but are not limited to:

- Induction Attendance
- Medical Attendance
- Training Matrix
- Qualification records of personal
- Risk assessments
- Method Statements and Standard Operating Procedures
- Permit to Work (PTWs)
- Job/Safety/Hazard Analysis (JSAs/JHAs)
- Equipment Inspection sheets.
- Incident Reports (*If Applicable*)
- Environmental Declarations
- HR Compliance Records
- Procurement Documentation Records
- Monthly & Quarterly Audit Reports on HSE, HR and Procurement

26. HR AND EMPLOYMENT

26.1 HR Development

The Project is committed to building a competent workforce. All employees - regardless of employer – must demonstrate required competence through formal education, specialized training, and/or practical experience. Skills development is a legal obligation under the Mining (Local Content) Regulations, 2018. All contractors and service providers must comply with the Employment and Labour Relations Act, 2004 and, this Contractor's Handbook

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Contractors must submit a three-month labour plan to TNCL Human Resources for review and joint approval by the Senior HR Manager and the Project Director. Contractors shall not mobilize personnel to site until written joint approval has been issued. The labour plan shall include workforce numbers, labour categories, sourcing zones, recruitment method, expatriate requirements, and contract durations.

The Labour Plan shall include the required roles, job descriptions, contract duration, and key terms. HR is responsible for overseeing all recruitment from labour-sending communities. The local skills database maintained by TNCL HR is the primary and mandatory recruitment mechanism for specified worker categories, in accordance with the Contractor's Handbook.

Recruitment agents may be used only with approval from the Senior HR Manager and the Project Director, in accordance with the Contractor's Handbook.

Recruitment agents may only be engaged where contractors have demonstrated that the required skills cannot be sourced from within the project labour-sending areas.

26.2 Contractor Labour Mobilization Plan

After vendor onboarding, contractors must submit a three-month labour plan to the Senior HR Manager and the Project Director:


- Workforce numbers, labour categories, sourcing zones.
- Recruitment methods (including Labour Desk use and hard-to-fill roles).

Contractors may not mobilize workers from outside approved zones without written confirmation and approval from the Senior HR manager and Site Construction manager.

26.3 Work Permit Guidelines and Application Process

Expatriate personnel shall comply with all applicable Tanzanian immigration and labour laws. Depending on assignment duration and role, expatriate personnel may be required to obtain Work Permits, Residence Permits, or Business Visas, as applicable. As a general rule, Work Permits and Residence Permits apply to expatriate assignments exceeding six (6) months. Short-stay specialist, OEM, vendor, and commissioning personnel on site for less than three (3) continuous months may be mobilized on Business Visas where permitted by law. Where an expatriate assignment is three (3) months or more but not exceeding six (6) months, the applicable permit or visa category shall be confirmed by TNCL HR in writing prior to travel. No expatriate personnel shall travel to the site or commence work without written confirmation from TNCL HR that the applicable immigration requirements have been satisfied.

Depending on assignment duration and role, expatriate personnel may be required to obtain Work Permits, Residence Permits, or Business Visas, as applicable.

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For avoidance of doubt, where an expatriate assignment is three (3) months or more but not exceeding six (6) months, the applicable permit or visa category shall be confirmed by TNCL HR in writing prior to travel, based on the specific role, duration, and regulatory requirements.

No expatriate personnel shall travel to site or commence work without written confirmation from TNCL HR that the applicable immigration requirements have been satisfied.

in accordance with Tanzanian labour and immigration laws.

26.4 Work Permit Application Process

Contractors employing expatriates are responsible for securing work permits for their personnel and paying all applicable in-country taxes as mandated by the Tanzania Revenue Authority. They must also comply with the requirements of the **Ministry of Labour, Youth, Employment, and Persons with Disabilities**.

Work permit applications must be submitted online via the e-permit portal (Tanzania Work Permit Application: kazi.go.tz).

26.5 Required Documentation

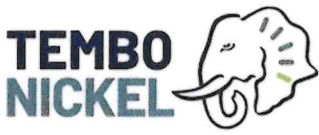
Work Permit documentation requirements vary by permit class, but generally include and are not limited to:

- Employer or Project justification letter.
- Recent passport-size photograph (blue background).
- Valid passport (minimum six (6) months validity).
- Curriculum Vitae (CV).
- Academic and professional certificates (translated where required).
- Employment or engagement contract.
- Detailed job description.
- Professional registrations and sectoral approvals (where applicable).
- Business license and certificate of incorporation.
- Memorandum and Articles of Association or organization constitution.
- Proof of registration with NSSF and WCF.
- Taxpayer Identification Number (TIN), VAT registration (where applicable), and tax clearance certificate.
- Proof of business premises (where applicable).

26.6 Work Permit Categories

26.6.1 Long-Term Work Permit

Long-Term Work Permits apply to expatriates engaged for periods exceeding six (6) months, including management, supervisory, operational, or specialist roles.

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Pre-application requirements include:

- Confirmation that the role is critical to Project delivery.
- Evidence of efforts to identify qualified Tanzanian nationals.
- Approved localization and succession plan.
- Valid employment contract compliant with Tanzanian Labour Law.
- Full statutory compliance by the employing contractors.

Long-Term permits are issued for a defined validity period and are subject to renewal and continued justification.

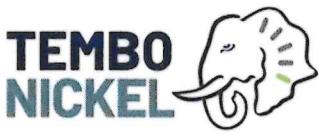
Work permit processing can take up to three months based on current regulatory practice; however, the actual timeline may vary depending on application complexity and the workload of the relevant authorities.

26.6.2 Work Permit Class A – Self-Employed Investors

A Class A Work Permit is issued under the Non-Citizens (Employment Regulation) Act, Cap. 436 (R.E. 2023) to foreign nationals who are self-employed investors engaged in trade, business, agriculture, mineral prospecting, or manufacturing in Tanzania. This class applies to company directors, investors, and sole proprietors operating their own enterprises. Applicants registered with the Tanzania Investment Centre (TIC) with a qualifying investment above USD 500,000 (foreign-owned) or USD 100,000 (joint ventures) benefit from a streamlined process through the TIC window. Under the Labour Laws (Amendments) Act No. 4 of 2025, a Class A permit holder who intends to engage with additional companies in which they hold shares must obtain written authorization from the Labour Commissioner rather than applying for a separate permit for each company. Work permits are valid for up to two (2) years and are renewable on continued compliance.

26.6.3 Work Permit Class B – Employed Expatriates in Specialised Roles

A Class B Work Permit is the primary permit type applicable to expatriate employees at the Kabanga Nickel Project. It is issued to foreign nationals who possess qualifications or skills – preferably in highly technical occupations – that are not readily available in the Tanzanian labour market, and who are employed by a company registered in Tanzania. The employer must demonstrate to the Labour Commissioner that all reasonable efforts have been made to identify suitably qualified Tanzanian nationals. An approved localisation and succession plan showing how skills will be transferred to Tanzanian staff is required with every application. The application must be submitted before the expatriate enters Tanzania, via the online portal at www.kazi.go.tz, which simultaneously processes the corresponding Class B Residence Permit from the Immigration Department. Permits are valid for up to two (2) years and are renewable. The employer must notify the Labour Commissioner within fourteen (14) days of

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cessation of a permit holder's employment.

26.6.4 Work Permit Class C – Other Professional Categories


A Class C Work Permit covers professionals not qualifying under Class A or B. This category includes medical and healthcare professionals, oil and gas experts, science and mathematics teachers and lecturers, researchers, volunteers, missionaries, and NGO employees. Missionaries, volunteers, and NGO staff may instead present an exemption letter from the relevant authority in lieu of a work permit. A corresponding Class C Residence Permit issued by the Immigration Department is required. Applications for Class C must be submitted before the applicant enters Tanzania.

26.6.5 Residence Permits – Classes A, B and C

All foreign nationals intending to reside in Tanzania for more than ninety (90) days must hold a Residence Permit issued by the Commissioner General of Immigration Services. There are three classes: Class A for self-employed investors; Class B for expatriate employees of companies or private institutions; and Class C for all other categories (researchers, retired persons, missionaries, volunteers, interns, etc.). Where a work permit is applied for via www.kazi.go.tz, the system simultaneously submits the Residence Permit application to the Immigration Department, eliminating duplicate submissions. Applications for Class B and C Residence Permits must be made while the applicant is outside Tanzania. The maximum permit validity is two (2) years, renewable for up to a cumulative eight (8) years. A permit lapses if the holder does not enter Tanzania within ninety (90) days of issuance. Dependents (spouse and children under 18) may apply for dependent passes from the Immigration Department for the same duration as the principal permit.

26.6.6 Business Visa – Short-Stay Assignments (Up to 90 Days)

A Business Visa is issued for a maximum of ninety (90) days to nationals of countries that require a visa to enter Tanzania. It is appropriate for attending business meetings or conferences, conducting audit assignments, repairing or commissioning equipment, and delivering specialized training. It may be obtained at Tanzanian embassies, consulates, or at designated entry airports at a cost of USD 250. A Business Visa does not authorize the holder to perform regular employment duties or receive payment from a Tanzanian entity. Any activity constituting employment requires a valid Work Permit regardless of duration. Where there is any doubt as to whether a Business Visa suffices for a specific assignment, TNCL HR must confirm the applicable requirement in writing before travel. Contractors shall submit to TNCL HR the details of all personnel requiring Business Visas within the timelines prescribed by TNCL HR; this applies specifically to specialized skilled personnel, OEM representatives, and

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commissioning staff on assignments of less than ninety (90) continuous days.

26.6.7 Special Pass

A Special Pass is a temporary Immigration Department authorization under section 12 of the Immigration Regulations, 1997, available in exceptional circumstances – for example, where an expatriate has changed employer and remains in Tanzania while a new Residence Permit is processed. A Special Pass does not constitute a Work Permit and does not authorize employment without a concurrent Work Permit. Contractors must not treat Special Passes as a routine immigration tool; their use is exceptional and requires prior written approval from TNCL HR.

26.6.8 General Compliance and Enforcement

Working in Tanzania without a valid Work Permit is a criminal offence under the Non-Citizens (Employment Regulation) Act, Cap. 436, carrying penalties including fines and potential deportation of the individual and prosecution of the employing contractor. The Mining Commission must be informed of all foreign workers engaged in the mining sector. Contractors must maintain up-to-date records of all work permits, residence permits, and business visas for their expatriate personnel and make these available to TNCL HR or the Owner’s EPCM on request. In 2025, the Tanzanian Government commenced coordinated nationwide inspections targeting compliance with work permit and residence permit requirements; contractors must ensure ongoing compliance at all times.

26.7 Labour Desk


- The Kabanga Project will make the labour desk available to contractors engaged in the project to ensure they recruit the majority of workers, especially semi-skilled and non-skilled, from the villages near the project footprint and the Ngara district and have the required qualifications. This labour desk contains key information, including potential candidate qualifications, skills, experience, age, gender, availability, semi-skilled, and specified skilled roles.

A proper selection process will be conducted. The labour desk is intended to be a primary mechanism for the worker categories defined in the Contractors Compliance Framework below.

Note: Use of the TNCL Labour Desk is mandatory for all specified categories and subject to audit

Disclaimer:

The Client will provide Bidders (Contractors) with access to the Client’s Tanzanian Labour Desk for the purpose of identifying potential skilled, semi-skilled, and unskilled local labour.

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Such access is provided in good faith and on an information-only basis. The Client makes no representation or warranty, express or implied, regarding the availability, suitability, accuracy, completeness, or adequacy of any labour identified through the Labour Desk. Engagement of local labour shall be at the Bidder's (Contractor's) sole risk and on an equitable, first-come, first-served basis. The Client shall have no liability for any loss, cost, delay, or damage arising from reliance on Labour Desk information. Bidders (Contractors) remain fully responsible for all decisions relating to the engagement, hiring, appointment, and management of local labour, strictly in accordance with applicable labour laws and Tanzanian Mining Regulations.

26.7.1 Hiring Zones and Areas of Influence

a) Primary Zone

The Primary Zone comprises workers hired from within the Ngara District, where the Project is located. Recruitment efforts will prioritize this zone wherever skills are available to maximize local participation and cost-effectiveness. The Labour Desk will be the main source of local recruitment. All contractors are expected to prioritize recruitment from local communities. All unskilled labourers shall be hired from the Primary Zone. Semi-skilled labour shall be recruited primarily from the Primary Zone. Where insufficient capacity exists, semi-skilled labour may be recruited from the Secondary Zone, subject to Labour Desk verification and prior written approval by TNCL HR.

Contractors are responsible for ensuring that Employees from the Primary Zone have Access to Bus collection points to transport them to the project. These points will be agreed with TNCL or the EPCM


Bus collection points will be up to a 30 KM radius from the project footprint

b) Secondary Zone

The Secondary Zone covers the broader Kagera Region and neighboring regions within approximately 300 km of the Project, including Geita, Shinyanga and Mwanza. There are several operating mines in the Lake Zone, and labour providers will draw on regional skills databases to support the Project. Contractors will be encouraged to recruit from the Secondary Zone when required skills are not available in the Primary Zone.

c) National Zone

The National Zone covers workers recruited from other parts of Tanzania. These workers must possess skills and qualifications not available in the Primary or Secondary Zones. Unskilled and semi-skilled workers will not be recruited from the National Zone.

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d) International Zone

The International Zone covers workers recruited from outside Tanzania. Expatriate workers must possess qualifications and skills that are not available or very scarce in Tanzania. Contractors must submit their labour plans for review to assess and align expatriate labour requirements with localization objectives. Expatriates will be engaged primarily to transfer skills to local workers in line with the Local Content Regulations. It is anticipated that some senior leadership, technical and consulting roles will initially be filled by expatriates.

To promote pay equity and consistent remuneration across all Project contractors, TNCL will provide contractors with a current industry salary survey for mining and construction to guide the development of their pay structures.

26.7.2 Minimum Wage Compliance

All Contractors and subcontractors engaged on TNCL projects shall ensure that all employees are paid not less than the applicable statutory minimum wage prescribed under the Labour Institutions (Minimum Wage for Private Sector) Order, 2025 (as amended) for the relevant sector, plus a minimum uplift of five percent (5%).

Where an employee's role falls within more than one sector classification (including, but not limited to, Mining and Construction), the higher applicable minimum wage, plus the 5% uplift, shall apply.

Nothing in this clause shall prevent the payment of wages above this level where required by:


- Collective Bargaining Agreements (CBAs),
- Applicable laws or regulations,
- Market conditions,
- Lender, IFC, or project-specific requirements, or
- More favorable terms contained in individual employment contracts.

Contractors shall maintain accurate payroll records demonstrating compliance with this requirement and shall make such records available to TNCL or the Owner's EPCM upon request.

26.7.3 End-of-Contract Completion Bonus

Upon successful completion of the Contract, the Contractor shall pay eligible employees an **end-of-contract completion bonus, one (1) week of the employee's basic wage**, for every six (6) months completed, provided that:

- The employee completes the full contract or assignment period,
- All HR, HSE, medical, and demobilization requirements have been satisfactorily completed, and

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- The employee has not been subject to dismissal for misconduct or gross negligence.
- The completion bonus shall be payable upon final demobilization and clearance and shall not form part of the employee's basic wage for purposes of leave, overtime, severance, or statutory benefit calculations, unless otherwise required by law.
- Payment of the completion bonus shall be subject to verification by TNCL or the Owner's EPCM.

End-of-Contract Completion Bonus Table


Completed Service Period	Completed 6-month periods	Bonus Entitlement
6 – < 12 months (1st completed period)	1	1-week basic wage
12 – < 18 months (2nd completed period)	2	2-week basic wage
18 – < 24 months (3rd completed period)	3	3-week basic wage

Contractors shall comply with the HR reporting requirements defined in this Contractor's Handbook, including prescribed monthly and quarterly submissions and any additional reports instructed by TNCL in writing or as per RFT. HR recordkeeping provisions in this Handbook form part of the contractor's contractual compliance obligations.

Contractors shall comply with the HR reporting requirements defined in this Contractor's Handbook, including prescribed monthly and quarterly submissions and any additional reports instructed by TNCL in writing. HR recordkeeping provisions in this Handbook form part of the contractor's contractual compliance obligations.

27. ENVIRONMENTAL MANAGEMENT


All Contractors and or Subcontractors shall comply with all applicable environmental legislation, regulations, and recognized guidelines in every jurisdiction of operation, particularly where their products or services may affect the Companies' own compliance. The obligation includes:

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- All Contractors and Subcontractors shall comply with all applicable environmental laws, regulations, permits, and TNCL Environmental and Social Management requirements, and shall conduct all activities in a manner consistent with the IFC Performance Standards.
- Contractors shall implement and maintain an effective Environmental Management System proportionate to their scope of work, aligned with IFC Performance Standard 1, to identify, assess, manage, monitor, and report environmental risks and impacts. Contractors shall prevent pollution, spills, erosion, land degradation, and uncontrolled emissions; minimise the consumption of natural resources; improve energy efficiency; and implement waste avoidance, segregation, reuse, recycling, and disposal practices in accordance with TNCL requirements and IFC Performance Standard 3.
- Water shall be managed responsibly, recognising water as a finite resource, through conservation, reuse, and recycling measures where practicable. Environmental incidents shall be reported immediately to the TNCL Environmental Department.
- No land clearance, vegetation removal, or earthworks shall occur without prior written approval and an approved environmental clearance permit issued by the Environmental and Social Departments. Contractors shall implement all approved rehabilitation and site-restoration requirements during demobilisation.
- Contractors shall protect wildlife, biodiversity, and environmentally sensitive areas. Areas identified as Critical Habitat or biodiversity-sensitive zones shall be subject to strict controls, and no clearing, disturbance, access, or operational activity shall occur unless expressly authorised by the Environmental Department, in accordance with IFC Performance Standard 6. All personnel shall be made aware of such areas and shall comply with site-specific protection measures, buffer zones, access restrictions, and wildlife protection requirements. Any activity with potential impacts on Critical Habitat shall be subject to prior environmental review and approved mitigation measures.
- If cultural heritage material or suspected human remains are encountered, work shall cease immediately, the area shall be secured, and the TNCL Environmental Department shall be notified without delay. No disturbance or removal shall occur, and all findings shall be managed strictly in accordance with **TNCL-ENV-SOP-0003, Chance Finds Procedure**, consistent with IFC Performance Standard 8.

28. ACCOMMODATION

The Accommodation Philosophy establishes the principles, standards, and responsibilities for the provision and management of accommodation at the Kabanga Nickel Project. Owing to


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the Project's remote location in Ngara District, limited private accommodation is available in nearby villages and may be utilized as approved overflow accommodation during peak construction periods. Additional overflow capacity may be provided within Project camp boundaries or through approved third-party facilities, subject to compliance with the minimum standards set out in TNCL-HRE-SOP-0001 (Kabanga Site Accommodation Procedure). Allocation of accommodation for eligible employees shall be undertaken in accordance with the Site Accommodation Procedure.

Provision of accommodation by TNCL is not guaranteed and shall not constitute a contractual entitlement unless expressly stated in writing.

Commercial Clarification – Accommodation Responsibilities: Contractors shall plan, provide, and price accommodation for their own personnel sufficient to meet their workforce requirements, except where TNCL expressly allocates accommodation in writing. Any TNCL-provided accommodation or overflow arrangements (if any) are limited, subject to availability and allocation, and shall not be assumed as guaranteed capacity for the contractor workforce. Owner-provided utilities and interface points (where provided) apply at designated connection points only; all internal distribution, reticulation, load management, and any temporary facilities remain the Contractor's responsibility unless explicitly stated otherwise in the RFT. Where services or consumables are identified as back-chargeable, contractors shall allow for such costs in their tender pricing.

For avoidance of doubt, all accommodation, utilities, services, and consumables referred to in this Contractor's Handbook are deemed included in the Contract Price and Program unless expressly stated otherwise in the Conditions of Contract.

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Note: Camp accommodation shall not be provided to Primary Zone workers, except where required for emergency work or approved shift work, as authorized by the Company.

Camp costs are subject to annual review and escalation. USD amounts are indicative; TSH equivalents will be calculated using the Bank of Tanzania mid-market rate prevailing on the invoice date.

Camp costs are full board, including laundry 3 times a week, accommodation cleaning 3 times a week, and internet. The office buildings are excluded from the cleaning cost.

The definition of Juniors, Management and Executives can be found in the **TNCL-HRE-SOP-0001, Kabanga Site Accommodation Procedure.**

29. CAMP SERVICES AND FACILITIES


29.1 Core Facilities

- Single ensuite accommodation units for management personnel.
- Shared accommodation units with shared ablution facilities for supervisors and general personnel and staff.
- Kitchen and canteen with balanced meal plans suitable for local labour dietary requirements in that region of Tanzania, as well as for expat labour:
 - Laundry facilities
 - Medical clinic with a first aid room.
 - Recreation areas (Gym, TV lounge, sports fields, & clubhouse)
 - Administration and induction centre.
 - Transport hub with bus drop-off and parking areas.

29.2 Utilities Provided by Owner

The Owner shall provide the following utilities and site services at designated connection or interface points only:

- **Hardstand Areas**
Prepared hardstand laydown areas for contractor offices, materials, and equipment at locations nominated by the Owner.
- **Power Supply**
A power connection point at the site boundary or designated interface point. All downstream distribution, reticulation, load management, backup generation, and consumption beyond this point shall be the Contractor's responsibility.
- **Water Supply**
A water connection point at the designated interface location. Internal distribution, storage, and usage beyond this point shall be the Contractor's responsibility.

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- **Sewage**

A sewage connection point at the camp or designated area. For satellite offices, laydown areas, or temporary facilities where permanent sewer infrastructure is not provided, the Contractor shall be responsible for providing and maintaining compliant on-site facilities (e.g. septic tanks, chemical toilets, or equivalent systems) and for all associated servicing, removal, and disposal requirements.

- **Waste Management**


Contractors shall implement and maintain effective waste management practices in accordance with TNCL requirements and IFC Performance Standard 3. All waste shall be avoided, minimised, segregated at source, stored, transported, treated, and disposed of in a manner that prevents pollution and environmental harm. Waste segregation shall be strictly applied in accordance with the TNCL colour-coded waste segregation system, and only approved waste streams, containers, and disposal or recycling facilities shall be used. Hazardous and non-hazardous wastes shall be managed separately, and waste handling shall comply with all applicable legal, permit, and TNCL Environmental Department requirements. Unauthorized disposal, dumping, or burning of waste is prohibited.

- **Road Access**

Access roads to the camp perimeter, Internal circulation roads and traffic management within the Contractor's work areas shall remain the Contractor's responsibility.

- **Fuel**

Fuel will be supplied by the Client. All fuel supplied shall be fully back-charged to the Contractor at the rates stipulated in the Contract or, where not expressly defined, at the Client's prevailing fuel purchase rates in effect at the time of supply. The Client's prevailing fuel purchase rates will be posted on the Project site notice board and updated within five (5) business days of any change. Contractors may request written confirmation of the applicable rate at any time from the TNCL Finance Department. Any dispute regarding a fuel back-charge must be raised in writing to the TNCL Finance Manager within fourteen (14) days of receipt of the relevant invoice; disputes raised after this period will not be entertained. All fuel consumption will be measured and recorded by the Client's fuel management system, and records will be made available to the Contractor upon written request. Contractors must include fuel back-charge costs in their tender pricing based on prevailing rates at the time of tender, escalation being for the Contractor's account.

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29.3 Messing and Canteens

Breakfast and dinner will be prepared and served at the kitchens and mess facilities. Temporary Construction Camps will also have additional messing facilities as required.

Lunch Packs and Meals Management

Lunch packs and on-shift meals must be collected by the contractors. Lunch packs and on-shift meals will be provided in reusable containers. Employees are responsible for the return of their containers at the end of the shift. Loss or failure to return the containers will be for the employee's account in accordance with company disciplinary and cost-recovery procedures. Contractors are responsible for ensuring that adequate covered messing (eating) facilities are available at or near their respective work areas. These facilities must include:

- Sufficient seating and tables for employees,
- Continuous access to potable (drinking) water for all employees.

All arrangements must comply with TNCL health, safety, and welfare requirements and be maintained in a hygienic and serviceable condition at all times.


29.4 Security Philosophy

Security is coordinated under the TNCL Operations Team Security Department. The Project will be responsible for site-wide access control and protection for accommodation camps. Contractors will be responsible for the security of their internal laydown areas for plant, materials, and equipment. Security services shall be provided through the Client's preferred security service providers. Security service rates applicable to contractors are as set out in the Conditions of Contract or, where not expressly stated, at the Client's prevailing rates at the time of service. Any change to applicable security service rates will be communicated to affected contractors in writing no less than thirty (30) days prior to the change taking effect, except where a change is required by law or by a regulatory authority, in which case the change will take effect from the date required by law with written notice provided as soon as reasonably practicable. Rate changes are subject to the change-in-law provisions of the Conditions of Contract where applicable. Contractors must price security service costs in their tender based on rates prevailing at the time of tender; rate escalation risk is for the Contractor's account unless expressly provided otherwise in the Conditions of Contract.

Owner Provides:

- Controlled entry/exit points with access logs at main access points.
- 24-hour security patrols and CCTV coverage.
- Security coordination meetings with contractors.

Contractor Provides:

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- Provision of internal asset and material protection for all Client free-issue equipment.
- Compliance with the Owner's/Client site access procedures TNCL-SEC-SOP-0001, Site Access and Material Control Procedure.
- Reporting of incidents and unauthorized activities.
- All camps and laydowns shall operate a single controlled entry and maintain a visitor log.
- The Contractor shall provide and maintain power, lighting, and water reticulation within the site establishment and all laydown areas.
- Lighting shall meet minimum safety requirements and applicable standards to ensure safe working conditions.

29.5 Camp Operation and Management

The Camp Operator (appointed by the Owner) will manage day-to-day operations for both permanent and temporary camps, including:


- Catering and housekeeping
- Facility maintenance
- Waste management and hygiene
- Recreation and welfare activities

The Camp Operator reports to the Owner's Camp and Facilities Coordinator.

Each unit must provide adequate natural light, insect screens, and ventilation compliant with ASHRAE or equivalent standards.

30. PROJECT COMMUNICATION

Regular project meetings will ensure effective communication and up-to-date reporting. All Contractors are required to prepare a monthly report summarising activities, including the Project Manager's overview, Health, Safety and Environmental (HSE) updates, project planning, cost control, engineering status, and procurement. This report will highlight key achievements, concerns and corrective actions, and will include relevant photographs. Routine reporting to the EPCM/Agent and the Project Owner's Team will be conducted through S-curves prepared and incorporated into the monthly progress report, illustrating the actual and forecast progress percentages compared to the planned early and planned late percentages for each stage. The report will also show periodic variance from the agreed baseline values.

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31. QUALITY CONTROL


The EPCM Contractor develops the Project Quality Plan (PQP) to outline quality objectives, responsibilities, procedures and audit programs. The quality management system includes pre-delivery quality assurance (QA) for all equipment and materials, ensuring suppliers adhere to their Quality Control Plans (QCPs) and progress non-conformances as they arise. The EPCM/Agent Project Manager is accountable for implementing quality procedures across various aspects of the Project, including safety, design, procurement and construction. Audits may be conducted to ensure adherence to these procedures, with findings reported for corrective action.

32. INTERNET AND SOCIAL MEDIA

- Contractors shall comply with all applicable Tanzania IT and data protection laws, including the **Cybercrimes Act, 2015** and the **Personal Data Protection Act, 2022**, as well as TNCL IT policies and standards (**TNCL-IMT-POL-0001, Information Technology Policy, TNCL-IMT-STD-0005, User Management Standard, TNCL-IMT-STD-0008, Management of Privileged Access Rights Standards** and **TNCL-IMT-STD-0010, Data Privacy Standard**).

32.1 Prohibited Activities

- Under no circumstances is an employee, consultant or contractor of TNCL authorized to engage in any activity that is illegal under local, state, federal or international law while utilizing TNCL-owned resources.
- Don't send unsolicited emails or spam.
- Don't harass anyone through email, phone, text, or other communication methods.
- Don't use social media or blog during work hours and refrain from using social media to disrupt your work duties.
- Don't post content that damages TNCL's reputation or includes discrimination, defamation, or harassment.
- The use of mobile phones or personal electronic devices during active work activities is prohibited. Personnel shall stop work, make the work area safe, and move to a designated safe area before using a mobile phone.
- Mobile phone use is permitted only in emergency situations where immediate communication is required to prevent injury, environmental harm, or property damage, or to contact emergency response services. Such use shall be limited to the duration of the emergency and reported to supervision as soon as practicable.

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33. DEMOBILIZATION PROCEDURE


A contractor shall hand over a consolidated HSE file to the Owner or the Owner's agent, upon completion of the project work and shall, in addition to the documentation referred to in the HSE specification, include a record of all Owner drawings, designs, materials used and other similar information concerning the completed project.

- o Obtain a construction completion certificate (last payment certificates will be withheld if the certificate does not accompany the certificates to the Company's procurement department).
- o Clear waste, scrap, and temporary structures.
- o Return the companies' property (IDs, radios, tools, all intellectual property).
- o The Contractor shall ensure completion of all HR and HSE clearance requirements, including NSSF contributions and the provision of Employee Certificates of Service, as required by TNCL HR Policies.
- o All disturbed areas and/or structures shall be restored in accordance with the Company's instructions and to the required original or agreed condition.
- o Any damage to company property or infrastructure must be repaired and restored to its original condition, failing which the full cost of repair or replacement will be back-charged to the Contractor.
- o Rating of all employees employed from the primary zone must be completed and submitted to TNCL HR prior to final demobilisation. Ratings shall assess each employee's performance, attendance, competency, and conduct during the contract period and shall be recorded on the prescribed TNCL HR evaluation form. These records will be retained in the TNCL Labour Desk database to support future recruitment decisions for the Project.

34. PROJECT CLOSE OUT

The closeout phase formally concludes the Project and addresses both administrative and commercial aspects.

- o Administrative closeout involves documenting the Project results, including TNCL acceptance, issuing as-built Owner drawings or the Owner agent drawings, and archiving key documents. It also includes recording lessons learned throughout the Project.
- o Commercial closeout focuses on finalizing procurement and contractual obligations. This includes settling vendor contracts, resolving claims, processing final invoices, and preparing indexed records.

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- o Retention monies, as agreed in the Contract, will be withheld if exit medical examinations are not completed for all employees. Proof of completed exit medicals must be provided to the Owner or the Owner's EPCM within fourteen (14) days of the employee's demobilization or release from the Project.

35. CODE OF CONDUCT AND FRAUD

The Companies reserve the right to immediately terminate a relationship with a supplier/contractor or personnel if they are found guilty of conduct that could reasonably lead to reputational harm relating to the Companies or any of their affiliates.

Suppliers/contractors, their employees, directors, officers, and agents are encouraged to report any alleged illegal or dishonest activity to the **Whistleblower hotline** at **255 800 120 032** in English or 225 800 120 067 in Swahili. All calls are toll-free, available 24 hours and anonymous.

All suppliers/contractors are therefore required to agree to, adhere to and be bound by the Companies' Code of Ethics and the Fraud, Corruption and Whistleblowing Policy, available on the Companies' websites.

36. HUMAN RIGHTS


Tembo Nickel Corporation Limited is committed to respecting and protecting the human rights of all people affected by its operations, including employees, contractors, communities, and suppliers, as per the **TNCL-HRE-POL-0006, Human Rights Policy**. Every Contractor working on our site is expected to uphold international human rights standards and follow responsible business practices. Where local laws differ from international human rights standards, a higher standard must be applied. Contractors are also expected to support grievance mechanisms and ensure affected people have access to fair remedies.

TNCL has a **Grievance Procedure – TNCL-HR-PN-05 - for the exclusive use** of employees and contractors.

Grievances may be lodged via the toll-free hotline **0800 750 258**, or by submitting written complaints at the designated Grievance Boxes located across the camps and Project Site.

37. SOCIAL PERFORMANCE REQUIREMENTS

The Companies should require their suppliers/contractors to respect local culture and communities and support the livelihoods and social upliftment of the communities in which TNCL operates.

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- Respect local communities and cultural practices.
- Do not take photos without consent, and do not offer gifts or donations directly to community members.
- In line with **TNCL-MI-018, Grievance Reporting Mechanism, Contractors** must immediately report received grievances to the TNCL Community Relations Department without delay. Failure to comply constitutes a contractual breach. Informal handling of community concerns or grievances is strictly prohibited.
- Behave professionally on and off duty (The Companies have a Zero Tolerance policy to sexual harassment and assault, bullying, and discrimination).

Clarification – Grievance Channels: (a) Worker/contractor workplace grievances (including employment, discipline, working conditions, GBV/SEAH and workplace conduct matters) shall be managed through the TNCL worker/contractor grievance mechanism. (b) Community grievances (raised by community members or relating to community impacts) shall be reported immediately to TNCL Community Relations and shall not be handled informally by contractors. Where a matter involves both a worker and a community impact, contractors shall treat it as a community grievance for reporting purposes while also following the worker grievance process for workplace handling, as directed by TNCL.


38. PROCUREMENT PROCEDURE

The Companies are committed to fair, equitable, competitive, and sound commercial processes, and give preference to TNCL local communities wherever reasonably possible to facilitate the socio-economic development of these communities. The contractors are to:

- Comply with local content regulation.
- Follow the Company-approved procurement channels.
- Avoid conflict of interest.
- Prioritise local suppliers.
- Ensure materials meet the Company’s quality, safety, and environmental standards.

38.1 Local Content, Service Levies, and CSR Commitments

All contractors and subcontractors engaged by TNCL are required to comply fully with the **Mining (Local Content) Regulations 2018** and its amendments of 2019, 2022, and 2025, as administered by the **Tanzania Mining Commission (Tume ya Madini)**. Contractors must demonstrate active prioritisation of indigenous Tanzanian companies — defined under the 2025 amendments as companies 100% owned by Tanzanian citizens — in the procurement of goods and services for the execution of contracted works. Where a contractor is a non-indigenous entity, it must operate through a qualifying joint venture arrangement with a wholly

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Tanzanian-citizen-owned company and must not engage in any categories of goods or services reserved exclusively for indigenous Tanzanian companies under **Regulation 13A** of the Mining (Local Content) Regulations. Contractors must further ensure that all applicable service levies, including mineral royalties payable to the **Tanzania Revenue Authority (TRA)** at the applicable statutory rates under the **Mining Act (Cap. 123 R.E. 2019)**, are settled within prescribed timelines and that their operational records and mineral handling activities do not impair TNCL's ability to meet its own statutory levy and royalty obligations to the Government of Tanzania. In fulfilment of Corporate Social Responsibility (CSR) commitments, all contractors must actively support and not undermine TNCL's obligations under the **Mining (Corporate Social Responsibility) Regulations**, including supporting community development plans collaboratively agreed with local government authorities, and refraining from any conduct that could expose TNCL to reputational, regulatory, or community relations risk. Contractors shall submit verified local content compliance reports, levy remittance evidence, and CSR contribution records to TNCL at intervals specified in the contract. **TNCL reserves the right to enforce retention of monies** otherwise due to the contractor where there is failure to comply with local content obligations, service levy remittances, or CSR commitments. Such retention shall remain in force until full compliance is demonstrated to TNCL's satisfaction, and persistent non-compliance shall constitute a material breach of contract, which may result in suspension of works, financial penalties, or contract termination, as determined by TNCL in accordance with applicable Tanzanian law.

39. CONTACT DETAILS

For further information, visit Lifezone Metals' corporate website:


info@lifezonemetals.com

OR

Tembo Nickel Corporation Limited

Kimbi House, Plot 344 Toure Drive, Oyster Bay

P.O. Box 106119

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40. COMPLIANCE

In monitoring adherence to this Contractor's Handbook, the Companies reserve the right to conduct compliance audits from time to time, upon reasonable notice. Should any supplier/contractor not comply with all the requirements of this Contractor's Handbook from the outset, the Companies expect such suppliers/contractors to demonstrate commitment and remain accountable to ongoing improvement initiatives over a reasonable time. Any breach of this Contractor's Handbook shall be regarded as a refusal/failure to carry out a lawful instruction and will be dealt with in accordance with the disciplinary procedure.

41. SYSTEM EVALUATION

This handbook shall be reviewed at least every two years by members of the OHSS department and presented to the Standard Committee for approval, or when organisational 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.

42. DISTRIBUTION

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

Table 1: Distribution

Copy	Controlled Document Folder Location
Master	Controlled Documents Central Filing System


43. CONTRAVENTION

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

44. DOCUMENT CHANGE PROCESS

The document changes process starts when the document custodian identifies 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

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document can be controlled and updated within the Filing system, ready for use by the end users.

44.1 Reason for Change

Table 2: 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

44.2 History of Change


Table 3: History of Change

Date of Change	Revision No	Revised Item (paragraph Number reference if required)	Reason Code	Name of Reviewer
18.01.2026	00	Initial Version		Manny Dos Ramos

45. RECORD CONTROL

Table 4: Record Control


Document Title:	Document ID:	Responsible for Maintenance:	Responsible for Filing:	Location of Storage:	Retention Period:	Method of Disposal:
TNCL-OHSS-HBK-0003	Document Controller	Document Controller	Document Controller	OHS Department	Hard Copy Two Years	Hard copy shared file, electronic

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46. 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
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					
11.					
12.					
13.					
14.					
15.					
16.					
17.					


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47. APPENDICES



47.1 ANNEX 1: Light Vehicle Prestart Checklist

	LIGHT VEHICLE PRE-START CHECKLIST (PLEASE PRINT)	Document ID: TNCL-OHS-CHK-0004					
		Document Owner: OHS Manager					
Driver Name: _____ Date: _____		Revision: 01					
KM Reading: _____ Number: _____		Approval Date: 19 th March 2024					
(Ensure each item is marked ✓ for OK or ✗ for defective)							
CATEGORY A FAULTS <small>The vehicle MUST NOT be operated. The supervisor must be notified immediately.</small>							
	✓ ✗	Action (Y/N)	Initial		✓ ✗	Action (Y/N)	Initial
Steering				Service Brakes			
Seat Belts				Park Brake			
4WD				Windscreen			
Fire Extinguisher				Lights & Indicators			
Clutch pedal/fluid				Fuel Leaks			
Flashing Light				Tires / Rims / Nuts			
CATEGORY B FAULTS <small>The vehicle MUST NOT be operated unless a fault is rectified or approved by the supervisor.</small>							
	✓ ✗	Action (Y/N)	Initial		✓ ✗	Action (Y/N)	Initial
Oil Leaks				Horn, backup alarm			
Water Leaks				Mirror (s)			
Spare wheel, Chocks				Wipers/Washers			
First Aid Kit				Aerial Flag			
Gauges				Tow Hitch			
Wheel Nuts Indicators				Dash Camera			
CATEGORY C FAULTS <small>The vehicle may be operated. Corrective action is required. Report it to your supervisor.</small>							
	✓ ✗	Action (Y/N)	Initial		✓ ✗	Action (Y/N)	Initial
Fuel/Oil/Water Levels				Tool Kit			
LV Clean / Damaged				Air Conditioner			
Cab Clean				Exhaust system			
Comments: _____ A pre-start check MUST be completed at the beginning of every shift, or prior to the operation of the light vehicle during the shift.							
Drivers' Name: _____		Signature: _____		Date: _____			
<small>Version No:01 This document is uncontrolled when printed or downloaded. You are responsible for ensuring that you use the most recent version of this document. Page 1 of 1</small>							

	LIGHT VEHICLE PRE-START CHECKLIST (PLEASE PRINT)	Document ID: TNCL-OHS-CHK-0004					
		Document Owner: OHS Manager					
Driver Name: _____ Date: _____		Revision: 01					
KM Reading: _____ LV Number: _____		Approval Date: 19 th March 2024					
(Ensure each item is marked ✓ for OK or ✗ for defective)							
CATEGORY A FAULTS <small>The vehicle MUST NOT be operated. The supervisor must be notified immediately.</small>							
	✓ ✗	Action (Y/N)	Initial		✓ ✗	Action (Y/N)	Initial
Steering				Service Brakes			
Seat Belts				Park Brake			
4WD				Windscreen			
Fire Extinguisher				Lights & Indicators			
Clutch pedal/fluid				Fuel Leaks			
Flashing Light				Tires / Rims / Nuts			
CATEGORY B FAULTS <small>The vehicle MUST NOT be operated unless a fault is rectified or approved by the supervisor.</small>							
	✓ ✗	Action (Y/N)	Initial		✓ ✗	Action (Y/N)	Initial
Oil Leaks				Horn, backup alarm			
Water Leaks				Mirror (s)			
Spare wheel, Chocks				Wipers/Washers			
First Aid Kit				Aerial Flag			
Gauges				Tow Hitch			
Wheel nuts Indicators				Dash Camera			
CATEGORY C FAULTS <small>The vehicle may be operated. Corrective action is required. Report it to your supervisor.</small>							
	✓ ✗	Action (Y/N)	Initial		✓ ✗	Action (Y/N)	Initial
Fuel/Oil/Water Levels				Tool Kit			
LV Clean / Damaged				Air Conditioner			
Cab Clean				Exhaust system			
Comments: _____ A pre-start check MUST be completed at the beginning of every shift, or prior to the operation of the light vehicle during the shift.							
Drivers' Name: _____		Signature: _____		Date: _____			
<small>Version No:01 This document is uncontrolled when printed or downloaded. You are responsible for ensuring that you use the most recent version of this document. Page 1 of 1</small>							

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47.2 ANNEX 2: Pre-Use Inspection Checklist for an Excavator

	STANDARD FORM			Document ID	TNCL-ENG-CHK-0048		
	PRE - USE INSPECTION CHECKLIST FOR AN EXCAVATOR			Document owner	Engineering Manager		
				Revision	Revision 00		
				Approve Date	17 th January 2026		
Date:	Plant number:	Statutory inspection No-Go Hazard: No Go. Report Immediately Go Hazard: Go But report			<ul style="list-style-type: none"> Observe all procedures Observe any special instruction DO NOT operate machine if in an unsafe condition Ensure machine is isolated and locked out before and after shift/work Use ticks/crosses in each box to indicate condition 		
Shift:	The equipment must not be used if any of the below mentioned No-Go hazard components are faulty, any Go hazards to be repaired within the same shift as report reported.						
Operator name:							
Operator license expiry date:							
Hour meter reading	START	END	POINTS TO BE CHECKED MUST BE IN SOUND CONDITION				
Litres diesel filled							
Item	Hazard Class	✓ / ✗	Comments	Item	Hazard Class	✓ / ✗	Comments
Lock-out devices present and operational	No-Go			Fire extinguisher/suppression system, present, sealed and checked	No-Go		
COF and License	No-Go			Operator door and handle operational	No-Go		
Headlights operational and secure	No-Go			Hooter and Reverse alarm	No-Go		
Rotating lights operational and secure	No-Go			Windscreen cracked or wipers not working	Go-But		
Controls Functional and slew function	No-Go			Bucket and attachments	Go-But		
Operator cabin in good condition	No-Go			Seat condition	Go-But		
Safety belt present	No-Go			Dash warning lights not indicating any fault	Go-But		
Mirrors in good condition	No-Go			Housekeeping	Go-But		
Tracks in good condition	No-Go			Air conditioner	No-Go		
Oil or hydraulic oil leaks	Go-But			Steps and handrails	No-Go		
PDS/VDS System	No-Go						
SIGNATURES:							
Operator Name:				Operator Sign:			
Acknowledged Foreman Name:				Acknowledged Foreman Sign:			