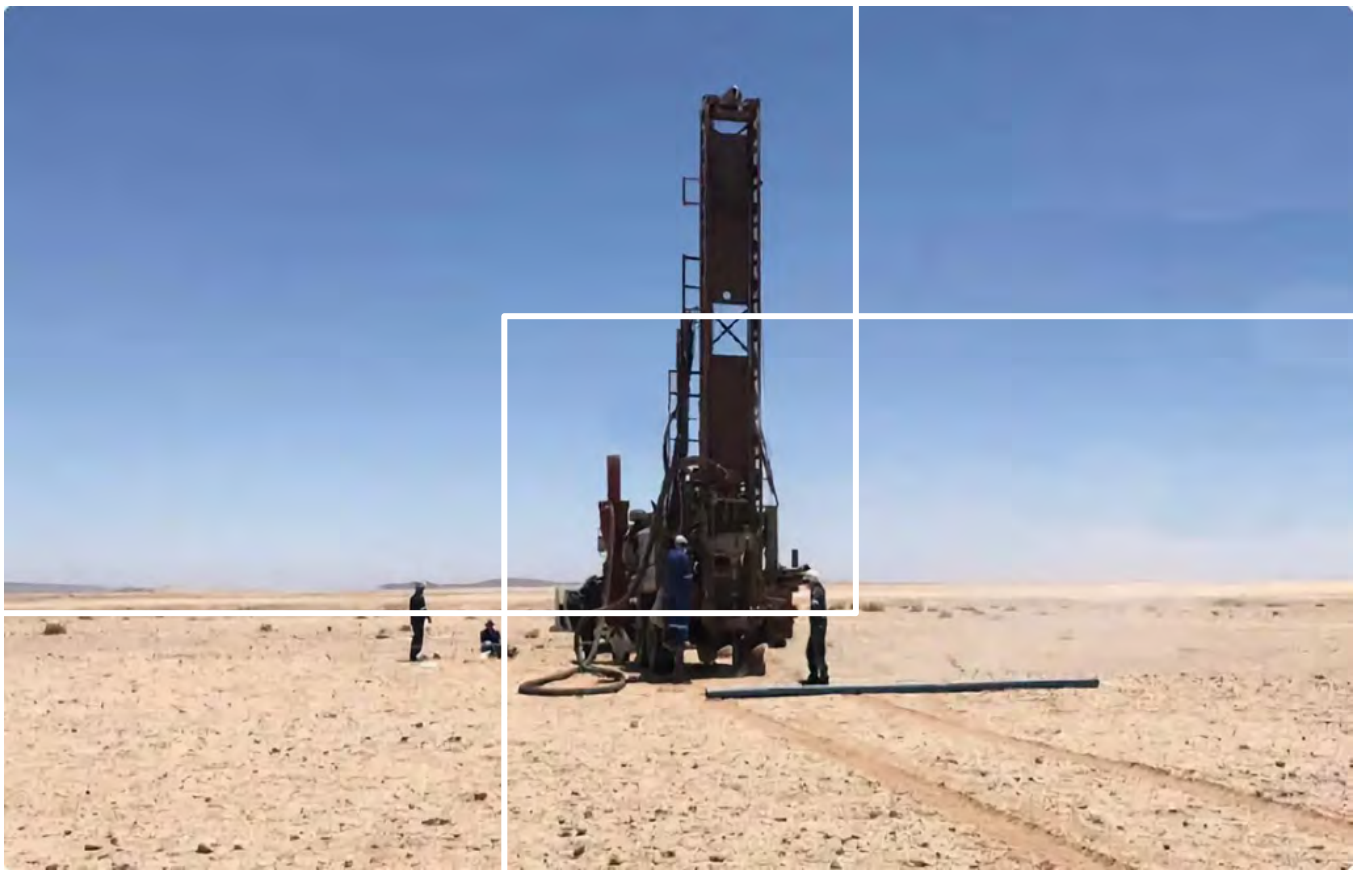

elevate uranium
carbon free energy

Submitted to: Marenica Ventures (Pty) Ltd.
Attention: Mr Murray Hill
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Klein Windhoek
Windhoek, Namibia

REPORT:

EXPLORATION FOR NUCLEAR FUELS ON EPL 8791 – ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

PROJECT NUMBER: ECC-79-647-REP-06-D

REPORT VERSION: REV 01

DATE: 28 JANUARY 2026

ECC ENVIRONMENTAL COMPLIANCE CONSULTANCY

TITLE AND APPROVAL PAGE

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DISCLAIMER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.[1]

[1] J. Bezuidenhout is seconded to Elevate for in country company management duties.

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ABBREVIATIONS

Abbreviations	Description
ASX	Australian Securities Exchange
ASTM	American Society for Testing and Materials
DEAF	Department of Environmental Affairs and Forestry
DWA	Department of Water Affairs
ECC	Environmental Compliance Consultancy
EMA	Environmental Management Act
EMS	environmental management systems
EPL	exploration prospecting licence
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
GPS	global positioning system
HR	human resources
HSE	health, safety and environmental
ID	identification
Km/h	kilometres per hour
Ltd.	limited
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
MSDS	material safety data sheet
NHC	National Heritage Council
No.	number
OHSE	operational, health, safety and environment
PPE	personal protective equipment
PTY	propriety
Reg	registration
RoD	record of decision
SOPs	standard operating procedures
ToRs	terms of reference
U-pgrade™	Uranium concentrate process developed by Elevate Uranium

1 INTRODUCTION

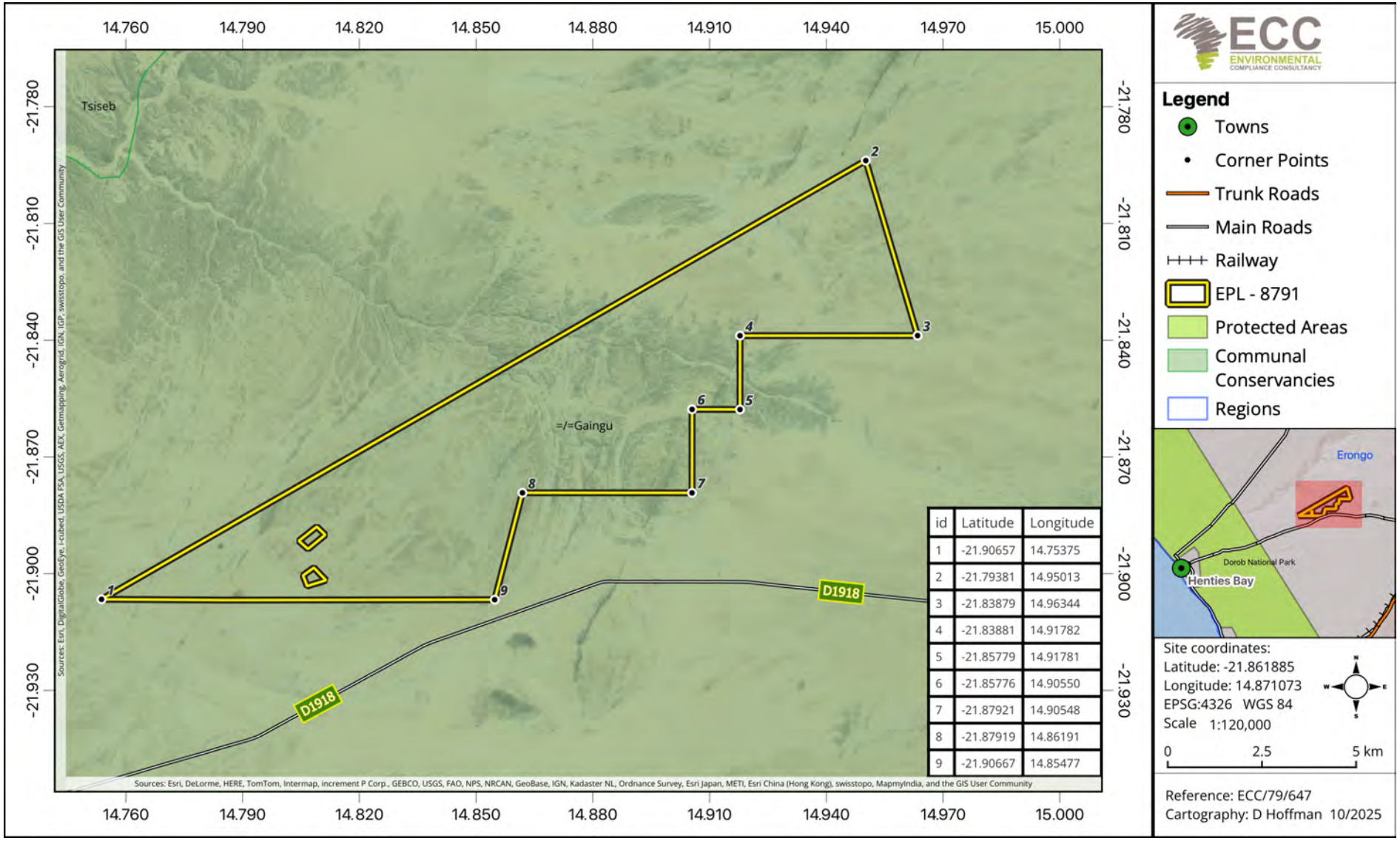
1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) (herein referred to as the environmental assessment practitioner (EAP)), has been engaged by Marenica Ventures (Pty) Ltd (Marenica or Proponent) to conduct an environmental and social scoping with impact assessment for the exploration of nuclear fuels in terms of the Environmental Management Act, No. 7 of 2007 and its regulations of 2012. An environmental clearance certificate application will be submitted to the competent authority, the Ministry of Industries, Mines and Energy (MIME) and the Ministry of Environment, Forestry and Tourism (MEFT), for a record of decision (RoD).

Marenica Ventures (Pty) Ltd (Marenica Ventures) is a wholly owned subsidiary of Elevate Uranium Limited (Elevate Uranium). Elevate Uranium Limited is an Australian Securities Exchange (ASX) Listed company. Elevate Uranium developed a uranium concentration process (*U-pgrade™*) that is unique and ground-breaking, lowering the extraction cost of uranium and significantly reducing potential environmental effects associated with the reduced mass of ore to be leached. This *U-pgrade™* process can be applied to surficial uranium deposits of which Elevate Uranium is exploring. Elevate Uranium is seeking to explore further uranium mining opportunities as the company undertakes exploration activities for nuclear fuel minerals in the Erongo Region.

Marenica Ventures holds Exclusive Prospecting Licence (EPL) for the proposed 'Marenica West' project (referred to as "the Project" herein) is located within exploration prospecting licence (EPL) 8791 and the Proponent proposes to undertake mineral exploration activities for nuclear fuels. The EPL is located northeast of Henties Bay, in the =/=Gaingu Conservancy, Erongo region. Access to the EPL can be obtained via the D1918 between Usakos and Henties Bay (Figure 1).

ECC has compiled this environmental and social management plan (ESMP) in terms of the Environmental Management Act (EMA) of 2007 and its regulations of 2012. The purpose of this ESMP is to support the scoping plus impact assessment report.



id	Latitude	Longitude
1	-21.90657	14.75375
2	-21.79381	14.95013
3	-21.83879	14.96344
4	-21.83881	14.91782
5	-21.85779	14.91781
6	-21.85776	14.90550
7	-21.87921	14.90548
8	-21.87919	14.86191
9	-21.90667	14.85477

Figure 1 - Locality map showing the location of the proposed exploration activities on EPL 8791

1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed Project is considered as a listed activity as stipulated in the Environmental Management Act, No. 7 of 2007 and its Regulations, promulgated in 2012. An environmental scoping report, plus impact assessment and (ESMP) are required to be submitted as part of the application to support the decision-making process for issuing an environmental clearance certificate.

This report presents the final ESMP and has been undertaken in terms of the requirements of the EMA and its Regulations.

1.3 PURPOSE AND SCOPE OF THIS REPORT

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

The ESMP forms an appendix to the environmental scoping plus impact assessment report and is based on the findings of the assessments carried out to date. The environmental scoping plus impact assessment report should be referred to for further information on the proposed Project, assessment methodology, applicable legislation and impact assessment findings.

This ESMP is a live document and shall be reviewed at predetermined intervals, and or updated during the environmental and social impact assessment (ESIA) process when or if the scope of work alters, or when further data or information is added. All personnel working on the Project will be legally required to comply with the requirements set out in the final ESMP that is approved by the Ministry of Industries, Mines and Energy (MIME) and MEFT.

1.4 MANAGEMENT OF THIS ESMP

The Proponent will hold the environmental clearance certificate for the proposed Project and will be responsible for the implementation and management of this ESMP. This ESMP will be reviewed, amended as required and approved ready for implementation. The implementation and management of this ESMP and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections.

1.5 LIMITATIONS, UNCERTAINTIES, AND ASSUMPTIONS RELATED TO THIS ESMP

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

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

The information contained in this ESMP is based on the project description as provided in the scoping plus impact assessment. Where the design or operation method is different, this ESMP may require updating and potential further assessment may be undertaken.

1.6 ENVIRONMENTAL ASSESSMENT PRACTITIONER

The environmental and social management plan has been prepared by ECC (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

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

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

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

This ESMP provides measures, guidelines and procedures for managing and mitigating potential environmental and social impacts. The ESMP also indicates monitoring and reporting guidelines and sets responsibilities for those carrying out management and mitigation measures.

2.1 OBJECTIVES AND TARGETS

Environmental objectives and targets have been developed so that exploration activities can minimise potential impacts on the environment, as far as possible.

Environmental objectives for the Project are as follows:

- Zero pollution incidents;
- Minimal vegetation clearing and earthworks;
- Minimal impact on regional groundwater users;
- Minimal visual and dust impacts to third parties/neighbouring stakeholders;
- Protect local flora and fauna; and
- Use natural resources effectively and efficiently.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The Proponent shall provide a Project exploration team to oversee and undertake the exploration activities, which will be composed of the Proponent's personnel and contractors. A nominated role shall be identified to ensure the management and implementation of this ESMP is carried out throughout the Project activities. The Proponent shall be responsible for:

- Ensuring all members of the exploration team, including contractors, comply with the procedures set out in this ESMP;
- Ensuring that all persons are provided with sufficient training, supervision and instruction to fulfil this requirement;
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood; and
- Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this ESMP, and meet the responsibilities listed above.

Table 1 lists the roles and responsibilities allocated to different management levels in the company and specific personnel.

Table 1 – Roles and responsibilities

Role	Responsibilities and duties
Proponent	– Responsible for the overall management and implementation of the ESMP; – Ensure environmental policies are drafted/updated and communicated to all personnel throughout the company; – Responsible for providing the resources required to effectively run operations and comply with the ESMP; – Appoint all managers or supervisory roles needed to ensure effective running of operations; and – Ensure systems for proper induction and training of personnel and contractors are in place.
Exploration management	– Manage all activities on the exploration Project; – Monitor daily operations and ensure systems are in place for implementation of the ESMP; – Maintain the community issues and concerns register and keep records of complaints; – Ensure corrective action are taken and communicated to complainants; and – Maintain up to date records of employees who have completed training and induction.
Site manager	– Ensure that all contract workers, sub-contractors and visitors to the site are aware of the requirements of this ESMP, relevant to their roles and always adhere to this ESMP; – Report any non-compliance or accidents; – Receive, recording and responding to complaints; – Ensure adequate resources are available for the implementation of the ESMP; – Ensure safe and environmentally sound operations; and – Responsible for the management, maintenance and revisions of this ESMP.
HSE (health, safety, and environment) appointed person/ environmental manager	– Devise, implement and maintain the Project's environmental management system (EMS); – Draft and update exploration operations specific environmental procedures; – Ensure on-site induction training is relevant and address issues from this ESMP; – Conduct all environmental audits, inspections and report findings to relevant personnel;

Role	Responsibilities and duties
	– Check the implementation of corrective action for incidents and complaints; – Ensure all environmental monitoring and reporting is done; and – Compile the bi-annual environmental report in readiness for submission to the Environmental Commissioner of the Department of Environmental Affairs and Forestry (DEAF).
Employees	– Adhere to measures set out in the ESMP; – Ensure they have undertaken a site induction; and – Report any operations or conditions which deviate from the ESMP as well as any non-compliant issues or accidents to the environmental manager.

2.3 CONTRACTORS

Any contractors hired during the exploration activities of the operations and for the Project duration shall be compliant with this ESMP and shall be responsible for the following:

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

2.4 EMPLOYMENT

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

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

3 COMMUNICATION AND AWARENESS

To ensure that potential aspects and impacts are minimised it is vital that personnel are appropriately informed and trained on how to properly implement the ESMP. It is also important that regular communication is maintained with stakeholders and regulatory authorities (i.e. surrounding community, National Heritage Council (NHC), MIME, MEFT, =/=Gaingu Conservancy) and made aware of potential impacts and how to minimise or avoid them. This section outlines the framework for communication related to the implementation of the commitments that are specified in this ESMP.

3.1 INTERNAL COMMUNICATION

During the exploration phase, the exploration manager and site manager shall communicate site-wide environmental issues to the exploration team through the following means (as and when required):

- Site induction;
- Site notices;
- Method statements and risk assessment briefings;
- Daily, weekly and monthly audits and site inspections;
- Toolbox talks, including instructions on incident response procedures; and
- Briefing on key Project-specific social and environmental issues.

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

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

3.1.1 SITE INSPECTION AND TOOLBOX TALKS

All personnel involved in the Project shall be inducted to the site regarding any specific environmental, social, health and safety issues. The workforce must be briefed on the observations recorded during the site inspection and risk assessment findings during toolbox talks. The workforce must demonstrate an understanding of the principles outlined in this ESMP and the potential environmental and social impacts associated with their activities. All Project personnel must also demonstrate a clear understanding of the procedures required to control these impacts and the consequences of departure from these procedures.

All Project personnel must demonstrate an understanding of the following:

- Demonstrate an understanding of the site's environmental rules and the broader regulations established by MIME, MEFT, =/=Gaingu Conservancy and the NHC;

- Understand the necessary steps to address any environmental issues and identify the appropriate contacts for resolving such problems;
- Understand the potential consequences of non-compliance with this ESMP and violation of relevant statutory licences and permits conditions; and
- The roles of responsible people working on the Project.

3.1.2 TRAINING AND ENVIRONMENTAL AWARENESS

All personnel working on the Project must be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training and work experience. When it has been determined that certain skills are lacking, training and refresher courses must be offered to the workforce. The exploration manager and site supervisor(s) must ensure records of these training sessions are always kept onsite and filed.

3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event, which demands immediate attention. It is any unplanned event, which results in the temporary loss of management control at site, but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies including environmental emergencies. Table 2 presents emergency contact details in emergency situations.

Table 2 - Emergency contact details

Town	Ambulance	Police	Fire brigade
Henties Bay	+264 (0) 500 020 Toll Free 924	+264 (0) 64 10111	+264 (0) 812411299

For large-scale spills and other significant environmental incidents, the fire services should be contacted as required and the office of the MEFT informed of the incident (telephone +264 61 284 2111). All correspondence with MEFT should be undertaken by the Exploration manager/Proponent. If hydrocarbon and petroleum spills of >200 L occur, the MIME must be informed using Form PP/11 titled “Reporting of major petroleum product spill”, issued by the ministry.

For the clean-up of smaller spills, the relevant material safety data sheet (MSDS) should be consulted to determine the appropriate clean-up procedure. Basic spill response training will be provided as part of the site environmental induction, spill response equipment, including relevant MSDS copies, will be provided in areas where potentially environmentally hazardous chemicals may be used.

3.3 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the exploration site shall be recorded by the receiver including:

- The name of the complainant;
- The contact details of the complainant;
- Date and time of the complaint; and
- The nature of the complaint.

The information shall be given to the Exploration manager, who is overall responsible for the management of complaints. The Proponent must address the complaints by following these measures:

- Record the complaint in the complaints register; and
- Provide a written response to the complainant of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The workforce shall be informed about the complaints register, its location and the person responsible, to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and will be available for government or public review upon request.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

This section outlines the overall monitoring commitments required for implementation during the exploration phase of the Project. It details procedures to ensure routine inspections and audits are conducted to ensure that Project's activities are aligned and remain compliant with this ESMP.

4.2 EXPLORATION/OPERATIONAL PHASE: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE

4.2.1 DAILY AND WEEKLY COMPLIANCE MONITORING

A copy of this ESMP will be on-site throughout the exploration/operational phase and will be available upon request. Contractors and subcontractors must be issued with a copy of this ESMP. It is the responsibility of the Exploration manager and Site manager to ensure this ESMP is complied with through their daily roles. Daily and weekly inspections will be undertaken by the Site manager. Any environmental concerns or impacts identified will be reported to the Exploration manager and actioned as soon as is reasonably practicable.

4.2.2 MONTHLY COMPLIANCE MONITORING

Monthly inspections will be undertaken by the Project manager and Site manager to assess whether the standards and procedures set out in this ESMP are being complied with and that environmental control measures are in place and working correctly and effectively. Any non-conformance will be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action(s) taken and any necessary follow up measures required.

4.3 REPORTING

All incident or non-compliance, including any environmental impact, failure of equipment or accident, is reported to the Exploration manager throughout exploration. The MEFT reserves the right to require the Proponent to submit bi-annual reports evaluating the Project's compliance with the commitments that are outlined in this ESMP.

For large-scale spills (i.e., > 200 litres) and other significant environmental incidents, the fire service should be notified as required and the MEFT office should be informed of the incidents (telephone +264 61 284 2111). If the spillage is of a fuel source (i.e. petrol/diesel), the MIME must be notified by completing form PP/11 (telephone: +264 61 284 8111).

If significant environmental spills (hydrocarbons) occur close or in a water source, the Department of Water Affairs (DWA) is to be notified. All correspondence with the relevant

ministries should be by the Exploration manager, with the assistance of the Site manager. Notification should occur no later than 48 hours after the incident has occurred.

For the clean-up of smaller spills, the relevant MSDS should be consulted to determine the appropriate clean-up procedure. Basic spill response training will be provided as part of the site environmental induction, spill response equipment, including relevant MSDS copies, will be provided in areas where potentially environmentally hazardous chemicals may be used.

Occupational incidents and accidents incurred on site should be reported to the authorities (i.e. Occupational Safety & Health Department) at the Ministry of Labour, Industrial Relation and Employment Creation (MLIREC), by using form F.5.

In case of archaeological objects or heritage artefacts discovered on-site, the chance find procedure must be followed and the NHC must be informed by the Exploration manager (Appendix A).

All correspondence and communication with local and regulatory authorities should be undertaken by the Exploration manager.

4.3.1 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this ESMP, the Exploration manager must ensure that corrective actions are implemented to the extent that the activities return to being compliant as soon as possible. In instances where the requirements of the ESMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during inspections and the Exploration manager will conduct follow ups to determine whether the corrective actions are implemented as planned and instructed.

A non-compliance event / situation is considered if:

- There is evidence of contravention of this ESMP and associated indicators or objectives;
- The contractors or subcontractors have failed to comply with corrective actions or other instructions issued to them or qualified authority; or
- There is evidence of negligence in recording, investigating and responding to community complaints through the established reporting channels and grievance resolution mechanisms.

Work will be stopped in the event of a non-compliance, until corrective action(s) has been completed. The non-compliance will be closed out once the Exploration manager has inspected the corrective action and confirmed that the issue has been satisfactorily resolved.

4.3.2 DISCIPLINARY ACTION

This ESMP is a legally binding document and non-compliance with its provisions may result in disciplinary action being taken against the perpetrator/s. These actions may include, but not limited to the following:

- Legal actions in accordance with other applicable environmental and labour laws;
- Imposition of monetary fines or penalties on contractors or subcontractors;
- Termination of contractual agreements with contractors, subcontractors or suppliers;
- Requirement for immediate corrective or remedial actions at violator's expense;
- Suspension or withdrawal of the Project approved licences and permits;
- Complete or partial suspension of Project activities until compliance is restored; or
- Disqualification from participating in future Project activities.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

Table 3 provides the overall management plan of potential impacts of the Project during exploration and rehabilitation phases. These plans provide mitigation and monitoring commitments, as well as the roles responsible for execution. The Exploration manager and Site supervisor(s) will use the exploration management plan to undertake daily, weekly and monthly inspections to ensure the Project remain compliant with this ESMP during the exploration phase. The rehabilitation management plan will be used by the Proponent and independent environmental officers to undertake inspections during the rehabilitation phase.

This ESMP has been developed to provide guidance to the exploration staff, contractors and subcontractors through the exploration/operations and rehabilitation phase.

5.2 EXPLORATION PHASE

The exploration phase on EPL 8791 aims to confirm the presence and extent of nuclear fuel minerals through low impact field activities. The exploration schedule includes geological mapping, followed by soil sampling and non-intrusive geophysical surveys to identify potential anomalies. If warranted, reverse circulation (RC) and diamond drilling (DD) may be undertaken to assess mineralisation at depth.

All activities shall be conducted using existing access routes where possible to minimise vegetation and soil disturbance. Radiation monitoring will accompany sampling and drilling to ensure compliance with national regulations and international safety guidelines (personal protection, air quality and groundwater levels and quality management where deemed relevant). Waste, drilling fluids and hazardous substances will be managed responsibly, and all disturbed sites shall be rehabilitated immediately after use. Stakeholders and land users will be informed of planned activities throughout the programme.

The Proponent must ensure that any contractors and their subcontractors are fully informed of the ESMP requirements and that these are strictly enforced throughout operations. The appointed HSE manager/Environmental manager or officer is responsible for conducting site inspections at least once a month to ensure that all the mitigation and management measures are being properly implemented and adhered to. Bi-annual compliance audits should be carried out, reports compiled and submitted to MEFT for review.

The specific environmental management measures and monitoring required for implementation during the exploration/monitoring phase are discussed in Table 3.

Table 3 – Identified exploration associated aspects and impacts, as well as associated mitigations and monitoring measures

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
Access and site activities	Conflict with residents in the conservancy and neighbours	– Ensure documented permission to enter the area is obtained from relevant landowners; – Ensure documented permission to enter and conduct exploration activities is obtained from the =/=Gaingu Conservancy before exploration activities take place; – Use existing roads for access to avoid new tracks and create cut lines with due regard to existing land use activities in the area; – Ensure appropriate supervision of all activities; – Develop and implement an operations manual or procedures to work on conservancy and implement monitoring programs thereafter; – Maintain continuous engagement with residents to identify any concerns or issues, and appropriate mitigation and management measures agreed upon; and – Accidents and incidents need to be reported to the Exploration manager and recorded in an incident register.	– Occupational health, safety and environment (OHSE) audits and inspections – Daily	– Site manager
	Limiting access to sites	– Compliance with all applicable laws and agreements;	– OHSE Audits and inspections	– Site manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Install clear, visible signs at all entry points to exploration areas; and – Place signs in locations easily visible to approaching vehicles and pedestrians.	– Daily	– HSE appointed person /Environmental manager
	Potential damage to cultural heritage sites	– Implement a chance find procedure as detailed in Appendix A of this ESMP; – Obtain heritage consent from NHC before exploration activities commence and maintain consent throughout operations; – Raise awareness about possible heritage finds; – In case archaeological remains are uncovered, cease activities and the exploration manager must assess and demarcate the area; – Exploration manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform ECC with GPS position; – If needed, further investigation may be requested for a professional assessment and the necessary protocols of the chance find procedure must be followed; – An archaeologist will evaluate the significance of the remains and identify appropriate action, for example, record and remove, relocate or leave	– Chance finds procedure and records	– Site manager – Exploration manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		premises (depending on the nature and value of the remains); – Inform the police if the remains are human; and – Obtain appropriate clearance or approval from the competent authority, if required, and recover and remove the remains to the National Museum or National Forensic Laboratory as directed.		
Socio-economic	Job creation for locals	– Maximise local employment and local business opportunities; – Enhance the use of local labour and local skills as far as reasonably possible; and – Endeavour to source goods and services from the local and regional economy, as far as reasonably practicable.	– Human resources (HR) recruitment policies and procedures	– HR manager
	Increased levels of stock theft on conservancy land	– Ensure documented permission to enter conservancy is obtained from all relevant leaders; – Training and raise awareness to sensitize employees about contentious issues such as stock theft and poaching; – Ensure appropriate supervision of all activities; and – Raise awareness and sensitize employees about contentious issues such as stock theft and poaching.	– HR recruitment policies and procedures	– HR manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
Training and awareness	Lack of environmental knowledge on ESMP requirements leads to environmental incidents	– All employees, visitors and contractors are required to go through a general site induction when entering the exploration site; – A site-specific induction is required for all staff and contractors who will work in the EPL and will be made aware of specific conditions per landowner requirements; – Environmental officer to provide weekly information regarding environmental issues of concern that the Exploration manager will convey to staff and contractors working in the EPL; – Awareness will be distributed by various channels as deemed appropriate; – Provide induction and refresher training to all personnel on radiation risks, safe work practices, and emergency procedures; – Notice/awareness boards to be kept up to date with the latest information shared; – Ensure radiation awareness signage is displayed in designated work and storage areas; and – Staff members and contractors will utilise the correct PPE during exploration activities.	– Environmental audits and inspections	– Exploration manager – HSE appointed person/ Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
Occupational health and safety	Injuries or fatalities sustained on-site	– The Proponent shall ensure that occupational health and safety requirements are incorporated into the bidding and tendering processes to guarantee that all contractors and subcontractors comply with these standards; – Contractors and subcontractors should comply with all safety requirements outlined in the contracts signed with the Proponent; – Conduct induction training for all personnel prior to commencing work, covering hazards, emergency procedures and safe work practices; – The Proponent and contractor(s) to ensure the appointment of a dedicated health and safety person and where required, safety, health and environment (SHE) representative(s); – Ensure competent supervision is in place for all exploration activities; – Maintain a clear chain of communication and incident-reporting procedure; – Conduct routine maintenance of all machinery to prevent mechanical failures; – Establish exclusion zones around drilling operations and ensure the areas are clearly demarcated;	– Daily – Weekly – Monthly	– Exploration manager – Site manager/supervisor – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Prepare and implement an emergency response plan (ERP) covering medical emergencies, fire, spills and accidents; – Provide fire extinguishers at designated areas (fuel storage areas, camps and near generators) and first aid kits; and – Conduct regular emergency drills (fire, evacuation, spill response		
Visual	Visual disturbances	– Barriers or fences shall be used if drilling occurs in locations that may affect residents or livestock; – Residents need to be informed at least two weeks in advance that drilling operations are within one (1) km of their property; – Maintain good housekeeping; – Apply dust suppression where possible; – Maintain continuous communication with interested and affected parties (I&APs) to identify concerns and mitigation measures; – Restrict speed of vehicles (<30 km/h); – Specific activities that may generate dust and impact on residents shall be avoided during high wind events; – All vehicles and machinery/equipment to be shut down or throttled back between periods of use;	– Daily observations	– Exploration manager – Site manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Maintain good housekeeping; and – Continuous engagement with residents to identify any concerns or issues, and appropriate mitigation and management measures agreed upon.		
Air quality	Increased dust levels	– All vehicles and machinery / equipment to be shut down or throttled back between periods of use; – Use existing access roads and tracks where possible; – Apply dust suppression where possible; – Cover of all vehicles transporting loose materials; – Cover or bag radioactive samples to minimise dust generation and radon exposure; – Restrict speed of vehicles (<30 km/h); – Use dust screens on drilling equipment where feasible; – Regularly maintain all vehicles, generators, and drilling equipment to ensure efficient combustion and minimise exhaust emissions.; and – Specific activities that may generate dust and impact on residents shall be avoided during high wind events.	– Daily inspections – Dust fallout monitoring	– Site manager – Environmental manager
Noise	Persistent low-frequency noise and vibration impact from	– Avoid noise generating activities at night;	– Daily – Weekly – Monthly	– Exploration manager – Site manager/supervisor

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
	RC drilling and DD and generators	– Work activities shall be planned and scheduled to prevent disturbance during nighttime hours (19:00–05:00); – Procedures for receiving complaints from nearby land users or residents to be in place and mitigation measures to be implemented should exploration generate excessive noise and vibration; – A complaints register must be kept. Complaints received should be addressed as per complaint handling procedures; – Drill equipment shall be suitably positioned to ensure that noisy equipment is away from receptors; – Avoid unnecessary equipment idling at all times; – The maximum speed on internal roads must be maintained at 30 km/h; – Nearby residents and landowners shall be notified of drilling schedules and operations prior to initiation; – Equipment to be maintained correctly and serviced when required; and – All equipment to be shut down or throttled back between periods of use.		– Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
Groundwater	Deterioration of groundwater quality due to hydrocarbon and oil spill during RC drilling and DD, resulting in groundwater contamination	– Good housekeeping; – Training through toolbox talks and induction; – Ensure spill kits are in place; – All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil; – Consider alternative drilling sites when the water table is too high; – Drill system will be fitted with sumps to direct any accidental spills into containment areas; – Accidental spills and leaks (including absorption material) to be cleaned as soon as possible; – Store bulk fuel in adequate containment areas (non-porous surface and bunded); – No damaged containers in use; – Major spills to be reported, also to the authorities; – If hydrocarbon and petroleum spills of >200 L occur, the MIME must be informed using Form PP/11 titled "Reporting of major petroleum product spill; – Where possible, water from existing water sources shall be used; – Refuelling will be done in areas with adequate preventative measures in place; – Implement a groundwater monitoring programme	– OHSE audits and inspections – Daily	– Site manager – Exploration manager – HSE appointed person/ Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
	Abstraction of water for DD and RC drilling fluids. Risk of slurry spills contaminating drainage lines.	– Obtain water abstraction permits where required and monitor water use. – Use closed-loop drilling fluid systems or lined sumps to prevent seepage. – Position drill pads away from drainage lines and sensitive habitats. – Line and manage sumps to prevent overflow during rainfall events. – Remove drill cores and all equipment promptly after drilling. – Backfill sumps and drill holes, reprofile pads, and rehabilitate areas progressively. – Implement spill response procedures and keep spill kits on site at all times.	– OHSE audits and inspections – Daily	– Site manager – Exploration manager – HSE appointed person/ Environmental manager
Water	Wastewater from RC drilling and DD sumps can contaminate surface and groundwater	– Any use of water for whatever purpose must be done in consultation with the landowner and the landowner shall be duly compensated for the use of such water; – If required, effluent/wastewater treatment, discharge and reuse licence shall be obtained from the Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR): Department of Water Affairs (DWA) and report as required in line with licence conditions;	– OHSE audits and inspections – Daily	– Site manager – Exploration manager – HSE appointed person /Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Wastewater discharges will be contained; – Workers will be made aware about the importance of wastewater management; – Good housekeeping; and – Ensure prompt clean-up of spills.		
Roads/parking management	Negative relations with residents in the conservancy, farmers and neighbours as well as poor maintenance which could lead to vehicle incidents	– Vehicle movement must be restricted to existing fence lines, roads, tracks, and dry riverbeds; – Should the need arise to create new roads or tracks, they shall be planned so as to cause no unnecessary environmental damage; and – All new roads must be rehabilitated on completion of the Project.	– Environmental audits and inspections – Physical and signed agreement (records) with the landowner(s)	– Site manager – Exploration manager
	Poor and unsafe vehicle movement and parking	– Identify and demarcate a central parking area on previously disturbed land or areas with minimal ecological sensitivity; – Position the parking area away from drill pads, fuel storage sites, and high-risk work zones; – Avoid placing the parking area on steep slopes, drainage lines, or erosion-prone areas; – Mark entry and exit routes clearly to control traffic flow and reduce unnecessary vehicle movement across the EPL;	– Daily	– Site manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Limit the parking footprint to the minimum area required; – Prevent parking on or near fuel storage bunds or hazardous material zones; and – Restrict parking to authorised personnel and contractors only.		
Terrestrial environment and ecology	Loss of biodiversity and habitat	– Use existing roads for access to avoid new tracks and create cut lines, with due regard for the existing ecosystem functions in the area; – Minimise clearance areas through proper planning of the exploration activities; – Route new tracks around established and protected trees and clumps of vegetation; – Identify and demarcate when required rare, endangered, threatened and protected species; – During toolbox talks and induction, highlight to workers so that the removal of significant plants is avoided; – Where possible rescue and relocate plants of significance with the appropriate permits in place from DEAF beforehand; – Drive to the conditions of the road and slow down when approaching wildlife; – Maintain a speed limit of (<30 km/h); and	– OHSE Audits and inspections – Daily	– Site manager – Exploration manager – HSE appointed person/Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Promote revegetation of cleared areas upon completion of the exploration activities.		
	Increase in invasive species in cleared areas	– All Project equipment arriving on site from an area outside of the Project or coming from an area of known weed infestations (not present on the Project site) should have an internal weed and seed inspection completed prior to equipment being used (Appendix B); – Ensure the potential introduction and spread of alien plants is prevented; – Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants; – Eradicate weeds and alien species as soon as they appear; and – Make workers aware about alien species and weeds.	– OHSE audits and inspections – Daily	– Site manager – HSE appointed person/Environmental manager
	Residing, nesting and slow-moving organisms can be disturbed, injured, or killed by movement of vehicles and equipment	– Restrict movements to areas of activities only; – Use existing tracks and routes only; – Identify rare, endangered, threatened and protected species in advance; – Route new tracks around protected species and sensitive areas; – Restrict movements to daytime hours;	– OHSE audits and inspections – Daily	– HSE appointed person or Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Training and raise awareness to sensitize employees and notify them on avoiding some areas; – No driving off designated access routes (into the bush) / off-road driving; – Drive to speed limits (<30 km/h) and – No animals or birds may be collected, caught, consumed or removed from site.		
	Accidental and uncontrolled fire	– Equipment to be well maintained and serviced regularly and documented proof kept; – Restrict movements of people to areas of activities only; – Train people and raise awareness about veld fires and firefighting and documented proof kept; – No open fire outside designated areas; – Ensure proper cooking facilities at fly camps; – No cigarette butts are discarded but contained and disposed of at an appropriate facility; – Proper fire hazard identification signage to be placed in areas that store flammable material (i.e. hydrocarbons and gas bottles); – Control and reduce the potential risk of fire by segregating and safe storage of materials; – Avoid potential sources of ignition by prohibiting smoking in and around facilities; and	– OHSE audits and inspections. – Daily – Pre-start checklists on all machines. – Incident records management	– Site manager – HSE appointed person or Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Firefighting equipment and fire breaks should always be at designated areas and should be maintained regularly.		
	Risk of spillage of hydrocarbons, chemicals or other dangerous goods/material	– Chemical and hydrocarbon spillages from drilling equipment, support fleet and vehicles will be cleaned up timeously in order to prevent contamination; – Should diesel fuel of more than 600 L or petrol more than 200 L be stored on site, a consumer installation certificate shall be obtained from MIME, the Petroleum Affairs Division; – Fuel and chemicals are handled with care; – Spill kits to be at designated areas across the site or available for use during refuelling, fuel/chemical delivery or use. – Absorption material should be available and at hand. Where sawdust is used it should be cleaned up immediately and not left for long periods as this poses a fire hazard; – Drip trays and HDPE liner should be used during drilling activities and placed under the rig and support equipment to avoid unwanted spills; – All hydrocarbons and hazardous materials/chemicals used during drilling must be	– Daily visual inspections – Pre-start checklists on all machines – Incident records management	– Exploration manager – Site manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		marked, stored in drip trays and MSDS accompany the products onsite; – Spill preventative equipment and materials to be made available at drill sites; and – Maintenance of equipment should be conducted off site and not in the EPLs, where practically possible, and – Equipment to be well maintained and serviced regularly and documented proof kept.		
	Waste generation and litter	– Implement the waste management hierarchy across site: Avoid, reuse, recycle, then disposal through burning or dump; – Waste shall be collected and shall be removed on a regular basis to avoid pests and bad odours; – Hazardous and hydrocarbon waste shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. Proof of waste disposal certificates should be kept on file; – Drilling water sumps should be barricaded at all times to limit the attraction of wildlife and immediately be closed when the water has dried up and sump is no longer required;	– OHSE audits and inspections – Waste management inspections – Safe disposal certificates	– HSE appointed person/Environmental manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Hazardous and non-hazardous waste shall be always stored separately and be appropriately sealed; – Disposal of hazardous or hydrocarbon waste at the Walvis Bay landfill; – Any medical or sanitary waste to be incinerated at the closed registered medical incinerator; and – Proof of safe disposal to be maintained		
Soil quality	Soil contamination due to mixing of earth matter, trampling, compaction and pollution due to RC drilling	– Equipment must be in a good condition to ensure that accidental hazardous or hydrocarbon spills do not occur and contaminate soil; – During drilling oil absorbent matting should be placed under and around the rig; – Limit the possibility of compaction and creating of a hard subsurface; – Limit the possibility of trampling; and – In the event of spills and leaks, polluted soils must be collected and disposed of at an approved site, - Limit the possibility to mix mineral waste with topsoil.	– Pre-start checklists on all machines	– Exploration manager – Site manager – Environmental manager/officer
	Soil erosion from DD drilling	– Where necessary, install diversions to curb possible erosion; – Restore drainage lines when disturbed; and	– OHSE audits and inspections	– Environmental manager/officer

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Topsoil should be stockpiled separately, and re-spread during rehabilitation.		
	Greater surface disturbance due to larger drill pads and sumps (if used) from DD and RC	– Design drill pads to minimise footprint and avoid sensitive habitats. – Construct chip containment areas to prevent dispersion by wind or runoff. – Implement regular dust suppression, especially during dry and windy conditions. – Store fuels in bunded areas and refuel away from drainage lines. – Collect and dispose of waste in accordance with approved waste management procedures. – Seal or cap drill holes after completion to prevent contamination pathways.	– OHSE audits and inspections	– Environmental manager/officer
Waste management	The improper handling of radioactive waste may lead to exposure to employees	– Screen drill cores and cuttings for radioactivity using handheld radiation detectors to identify uranium-bearing material early and trigger controls. – Segregate radioactive drill cuttings, core samples, contaminated PPE and consumables from general waste, and clearly label and store them in designated containers or areas. – Store radioactive materials in sealed, robust containers or lined skips, located in restricted areas	– OHSE audits and inspections	– Environmental manager/officer

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		away from workspaces, with access limited to trained personnel. – Require appropriate PPE (gloves, dust masks/respirators where needed, disposable coveralls) when handling potentially radioactive material, and ensure contaminated PPE is disposed of as radioactive waste. – Apply dust suppression (e.g. light wetting of cuttings) during handling and sampling to reduce inhalation risks, and enforce strict hygiene measures such as no eating/drinking in work areas and mandatory handwashing. – Provide basic radiation awareness training to exploration staff, covering risks, safe handling practices, emergency procedures and reporting requirements. – Dispose of radioactive waste through approved, licensed facilities or in accordance with national radiation and hazardous waste regulations, with records kept of quantities and disposal methods. – Limit time spent handling radioactive materials, rotate tasks where feasible, and conduct periodic exposure checks to confirm levels remain within acceptable limits.		

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Implement simple procedures for spills, damaged containers or unexpected high readings, including isolation of the area and notification of site management.		
	Generation and improper management of general (non-hazardous) waste leading to land contamination	– Use covered, animal-proof bins and skips to prevent windblown litter, scavenger access and visual pollution, especially in temporary camps. – Implement routine waste collection schedules to prevent accumulation, with daily clean-ups at active exploration and camp areas. – Dispose of all general waste at licensed municipal landfills or approved waste facilities and prohibit informal dumping or burial on site. – Separate recyclable materials such as plastics, paper and scrap metal and direct them to local recycling facilities where available. – Manage food waste carefully through sealed containers and frequent removal to minimise odours and attraction of wildlife or scavengers. – Inspect exploration sites and camps after demobilisation and remove all waste, followed by light surface clean-up to restore areas to pre-exploration condition.	– OHSE audits and inspections	– Environmental manager/officer

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Brief exploration crews and contractors on waste management requirements and assign responsibility for housekeeping and waste control.		
	Potential infiltration of non-contained/uncontrolled domestic wastewater into groundwater	– Ensure all wastewater containment structures are watertight, properly lined and constructed in accordance with the Water Resources Management Act, 2013 (Act No. 11 of 2013); – Locate sanitation facilities and wastewater storage systems at safe distances from boreholes, wells, drainage lines and areas of high groundwater vulnerability; – Arrange regular emptying and off-site disposal of wastewater by licensed service providers at approved wastewater treatment or disposal facilities; – Prohibit the discharge of untreated domestic wastewater onto land or into surface water bodies; – Train workers on the correct use of sanitation facilities and on the environmental and health risks associated with improper wastewater disposal; and – Develop and implement a wastewater management plan, including emergency response procedures for spills, overflows, or system failures.	– OHSE audits and inspections – Groundwater quality monitoring	– Environmental manager/officer

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
	Potential infiltration of non-contained/uncontrolled domestic wastewater into surface water	– Collect and contain wastewater from equipment washing, drilling and camp activities in designated sumps, lined pits or portable tanks to prevent uncontrolled surface discharge. – Designate specific wash-down areas with impermeable surfaces and bunding to capture wash water and sediments. – Use chemical toilets or sealed ablution systems for exploration crews, serviced regularly by licensed contractors to prevent leaks or overflows. – Install basic diversion berms, cut-off drains or sandbags upslope of work areas to prevent clean stormwater from contacting wastewater and transporting contaminants. – Allow suspended solids from drilling wastewater to settle in containment pits before reuse or disposal, reducing turbidity and contamination potential. – Reuse drilling fluids and wash water where practicable to minimise wastewater volumes requiring disposal. – Conduct regular inspections of sumps, tanks and sanitation facilities to identify leaks, overtopping or damage, especially after rainfall events.	– OHSE audits and inspections – Surface water quality monitoring	– Environmental manager/officer

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Implement simple response procedures for wastewater releases, including immediate isolation of the area, containment of flow paths and clean-up of affected surfaces.		
Resource use	Inefficient use of water resources	– Use water effectively and efficiently by following the reduce-recycle-reuse approach; and – Record volumes of abstraction and supply.	– Daily observations – Quaterly groundwater level monitoring	– Environmental manager/officer – Employees
Active exploration and drilling activities	Potential risk of exposure to radiation towards employees	– Comply with national radiation protection laws, licences and reporting requirements as set out by the National Radiation Protection Authority (NRPA); – Develop and implement procedures for radiation-related incidents, including unexpected high readings or spills of radioactive material; – Monitor exposure levels around drill sites, drill cuttings, and core storage areas using portable radiation meters; – Store core samples in marked, contained areas to prevent dispersion; and – Restrict access to storage areas to authorised personnel only. – All contaminated material should be radiation screened.	– Monitor radiation levels as required	– Site manager – Employees

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Exploration phase				
		– Should radiation levels be above clearance levels (as per IAEA standards and the NRPA guidelines, the waste should be treated as hazardous and disposed as such		
	Damage to vehicles, change and destruction of landscape, injury to wildlife,	– Rehabilitation to be conducted when drill site is no longer active. This will be determined on a site-to-site basis; – All materials, equipment and samples to be removed. Inspection to be done and environmental approval provided when everything is in order; – The contractor is fully liable for the management and compliance of all their sub-contractors on the sites.		– Exploration manager – Contractors

5.3 REHABILITATION PHASE

During the rehabilitation phase, a rehabilitation plan should be developed and implemented. Rehabilitation shall focus on restoring all areas disturbed during exploration to as close to their original condition as practical. Key activities will include backfilling drill pits/sumps, removing all waste and temporary structures and camps, recontouring and levelling disturbed ground and stabilising soils to reduce erosion risks. Where applicable, cleared areas will be re-vegetated with native species to support natural re-growth. Rehabilitation will be undertaken progressively as activities are completed and will be monitored once exploration operations cease.

Table 4 shows the specific environmental management measures and monitoring required for implementation during the rehabilitation phase.

Table 4 - Identified rehabilitation aspects and impacts, as well as associated mitigations and monitoring measures

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Rehabilitation phase				
Access and site activities (drilling)	– Misinformation to nearby communities	– Remove all signage at the end of the exploration programme unless requested by landowners or authorities to remain in place for safety; – Only designated access routes are to be used and speed limits should be adhered to; – The Proponent is to ensure final rehabilitation of all drill sites once drilling has stopped at each hole, as per contractual agreements; – All materials and equipment are to be removed before rehabilitation is conducted; and – The drill pad must represent the natural environment as best as possible to what it was before the disturbance commenced	– Once exploration has ceased	– Proponent – Site Manager/supervisor
Occupational health and safety	– Potential open drillholes, trenches and uneven landscape could pose a risk to staff	– Seal, cap and tag all drillholes with appropriate materials; – Remove hazardous objects (pipes, wiring, scrap metal); – Ensure stable ground conditions and smooth surface after backfilling; – Fire extinguishers and first aid kits shall be accessible; – Maintain clear evacuation routes and signage; and – Maintain records of all injury statistics, track corrective actions and record lessons learnt to improve safety practices on-site.	– Daily – Weekly	– Exploration manager – Site manager/supervisor – Contractors – Subcontractors

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Rehabilitation phase				
Visual	– Visual scars and disturbed landscape	– Restrict speed of vehicles (<30 km/h); – Remove temporary structures and waste materials immediately after completion of exploration; – Re-shape the landscape to naturally blend with the surrounding terrain; and – Encourage natural vegetation cover to recover visual uniformity.	– Daily observations	– Exploration Manager – Site Manager/supervisor
Waste management	– Solid waste pollution due to abandoned material	– Implement a site clean-up checklist after exploration; – Remove all waste and transport it to approved disposal sites; – Proof of waste disposal certificates should be kept on file.	– OHSE Audits and inspections; – Safe disposal certificates	– HSE appointed person/Environmental Manager
Surface water	– Runoff from disturbed soils causing sedimentation in nearby water bodies	– Install erosion-control measures during and after rehabilitation; – Ensure no hydrocarbons or chemical residues remain on site; and – Monitor runoff areas during rainy seasons.	– OHSE Audits and inspections;	– HSE appointed person/Environmental Manager
Terrestrial environment and ecology	– Delayed natural regeneration and/or invasion by alien species	– Re-seed or plant indigenous/native species where natural regeneration is insufficient; – Maintain vegetation buffers around rehabilitated areas; and – Conduct periodic monitoring and remove invasive species promptly.	– OHSE Audits and inspections. – Daily	– Site Manager – Exploration Manager – HSE appointed person/Environmental Manager

Aspect	Potential impacts	Management and mitigation measures	Monitoring requirement	Responsibility
Rehabilitation phase				
	– Habitat not fully restored, affecting species movement or recovery.	– Restore microhabitats where possible; – Limit vehicle access to rehabilitated areas; and – Conduct biodiversity monitoring post-rehabilitation.		
Soil	– Loose or exposed soils prone to erosion by wind and water	– Backfill all pits and trenches and compact soil appropriately; – Re-establish land profile to match natural contours; – Apply erosion control measures (e.g., brush packing, contour berms); and – Conduct post rehabilitation inspections after heavy rainfall.	– Daily – Weekly – Monthly	– Contractors – Subcontractors

6 IMPLEMENTATION OF THE ESMP

This environmental and social management plan:

A. Has been prepared according to a contract with the Proponent;

B. Has been prepared based on information provided to ECC up to January 2026;

C. Is for the sole use of the Proponent, for the sole purpose of an ESMP;

D. Must not be used (1) by any person other than the Proponent or (2) for any purpose other than an ESMP; and

E. Must not be copied without the prior written permission of ECC.

APPENDIX A - ARCHAEOLOGICAL AND HERITAGE PROCEDURE

Responsibility

Operator - must exercise due caution if archaeological remains are found
Foreman - must secure site and advise management timeously
Superintendent - must determine safe working boundary and request inspection
Archaeologist - must inspect, identify, advise management, and recover remains

Procedure

Action by person identifying archaeological or heritage material
a) If operating machinery or equipment - stop work;
b) Demarcate the site with flag tape;
c) Determine GPS position if possible; and
d) Report findings to foreman.

Action by foreman
a) Report findings, site location and actions taken to superintendent; and
b) Cease any works in immediate vicinity.

Action by superintendent
a) Visit site and determine whether work can proceed without damage to findings;
b) Determine and mark exclusion boundary; and
c) Site location and details to be added to project GIS for field confirmation by archaeologist.

Action by archaeologist
a) Inspect site and confirm addition to project GIS;
b) Advise NHC and request written permission to remove findings from work area; and
c) Recovery, packaging and labelling of findings for transfer to the National Museum.

In the event of discovering human remains
a) Actions as above;
b) Field inspection by archaeologist to confirm that remains are human;
c) Advise and liaise with NHC and Police; and
d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.

APPENDIX B - WEED AND SEED INSPECTION FORM