

**NAMLI EXPLORATION AND MINING (PTY) LTD,
PORTION OF THE FARM STEINKOPF NO. 22, NAMA KHOI MUNICIPAL
AREA, NORTHERN CAPE PROVINCE**



ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT

DMPR REFERENCE NUMBER	NC 30/5/1/3/2/10950 MP
AUDIT PERIOD	September 2025-March 2026

Prepared For:
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1. PROJECT SPECIFIC DETAIL

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ITEM	LOCATION AND AREA INFORMATION
Site Name	Steinkopf Mine
Property Description	Portion of the farm Steinkopf No 22
Location	±40 km north-east of the town of Steinkopf
Size of Mining Area	5ha



ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT NC 30/5/1/3/2/10950 MP

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**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

TABLE OF CONTENTS

1. PROJECT SPECIFIC DETAIL.....	1
2. ENVIRONMENTAL AUDIT REPORT.....	5
PROJECT DETAIL	5
DETAIL OF AUDITOR.....	5
SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT	6
ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE.....	6
LOCATION	6
PROJECT DESCRIPTION	7
SITE CONDITIONS	8
REPORTABLE ENVIRONMENTAL INCIDENTS	8
ADOPTED METHODOLOGY.....	8
INSPECTION ASPECTS.....	9
COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S	27
AUDITING OF EA, EMPR AND REPORTING THEREOF	27
GENERAL REPORT.....	27
ECO SIGNATURE.....	29
PHOTOGRAPHS.....	Error! Bookmark not defined.


2. ENVIRONMENTAL AUDIT REPORT

PROJECT DETAIL

Permit Number	NC 30/5/1/3/2/10950 MP	Date of Commencement	February 2023
Site name	Steinkopf Mine	Inspection Date	24 March 2026
Permit Holder	Namli Exploration and Mining (Pty) Ltd	Other Authorisations	N/A
Report Number	05		

DETAIL OF AUDITOR

(APPENDIX 7 SUB-REGULATION 3(A) & (B)):

ECO	Murchellin Saal
EXPERTISE	Mrs. MD Saal has 15 years of experience in environmental legal compliance audits, (GIS) geographic information system, mining right and permit applications and applications for environmental authorisations & Water use applications.
DECLARATION OF INDEPENDENCE	<p>I Murchellin Saal Registration: 2021/4203 declare that –</p> <ul style="list-style-type: none"> • I act as independent environmental control officer in this compliance audit; • I will perform the work relating to the audit in an objective manner, even if the results and findings are not favourable to the holder of the authorisation; • I have expertise in conducting environmental compliance audits, including knowledge of the Act and regulations that have relevance to the activity; • I will adhere to and comply with all responsibilities as indicated in the National Environmental Management Act and Environmental Impact Assessment Regulations. • I do not have and will not have any vested interest in the activity other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2014 (as amended 2017). <p align="center">  Signature of ECO </p> <p align="right">Date: 26 March 2026</p>



SCOPE & PURPOSE OF ENVIRONMENTAL AUDIT

(APPENDIX 7 SUB-REGULATION 3(C)):

This environmental audit report was compiled in terms of the requirements of the NEMA EIA Regulations, 2014 (as amended).

OBJECTIVE:

The objective of the environmental audit report (EAR) is to evaluate compliance of the operational activities with the Environmental Management Programme Report, 2014 (EMPR) as approved by the Department of Mineral and Petroleum Resources in 2015. To evaluate the effectiveness of the EMPR's, identify shortcomings, and discern the need for changes to the environmental management programmes.

INSPECTED AREAS:

The inspection included an assessment of the following areas:

- Access Road;
- Office and Storage Areas;
- Stockpile Areas;
- Plant Area;
- Parking Area.

To establish the environmental compliance assessment of the operation the mining site was inspected on foot by Greenmined Environmental.

ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE

(APPENDIX 7 SUB-REGULATION 3(F)):

The assumptions contained in this report are based on information gathered during the site audit as well as background details provided by site management. At the time of the inspection, mining operations had ceased in October 2024, and the site remains inactive (care and maintenance). In addition, most site-related documents had been removed from site; therefore, the audit relied primarily on visual observations and discussions with available personnel.

LOCATION

Site Location

The mining permit, and waste licence extents over a 5-ha portion of the farm Steinkopf No 22 in the Nama Khoi municipal area of the Northern-Cape Province. The farm is ±40 km north-east of the town of Steinkopf.

Site Map



Site Coordinates:

	DECIMAL DEGREES		DEGREES MINUTES SECONDS	
A	28°56'46.475"	17°58'33.917"	-28.946241°	17.976090°
B	28°56'48.426"	17°58'37.092"	-28.946794°	17.976973°
C	28°56'49.088"	17°58'37.744"	-28.946963°	17.977156°
D	28°56'50.168"	17°58'40.865"	-28.947271°	17.978024°
E	28°56'53.876"	17°58'45.134"	-28.948286°	17.979190°
F	28°56'56.137"	17°58'49.829"	-28.948932°	17.980510°
G	28°56'57.336"	17°58'50.981"	-28.949256°	17.980828°
H	28°56'58.679"	17°58'51.956"	-28.949640°	17.981099°
I	28°57'04.651"	17°58'48.058"	-28.951294°	17.980015°
J	28°57'03.276"	17°58'45.203"	-28.950904°	17.979222°
K	28°56'59.150"	17°58'47.978"	-28.949767°	17.979990°
L	28°56'58.146"	17°58'47.316"	-28.949491°	17.979807°
M	28°56'56.364"	17°58'47.381"	-28.949001°	17.979824°
N	28°56'51.785"	17°58'38.939"	-28.947725°	17.977489°
O	28°56'47.054"	17°58'31.512"	-28.946404°	17.975433°

PROJECT DESCRIPTION

The Applicant, Namli Exploration and Mining (Pty) Ltd, holds an environmental authorisation (EA), a mining permit (MP), and waste licence (WL) over a 5-ha portion of the farm Steinkopf No 22 in the Nama Khoi municipal area of the Northern-Cape Province.

The permit allows for the mining of Lithium ore (Li), Nickel (Ni), Manganese (Mn), Lead (Pb), Copper (Cu), Iron (Fe), Cobalt (Co), Gold (Au), Zinc (Zn), Silver (Ag), Tungsten (W), Uranium (U), Beryllium (Be), Rare Earths, Tantalum (Ta).

The objective of the project is the extraction of minerals containing the elements Ta, Li and Nb (Niobium) from two deposits known as Norrabees 1 and 2. The deposits are closely spaced (450 m) with extensive excavations present on both the outcropping of Norrabees 1 and 2. A large volume of tailings material, that contains spodumene and tantalite, are present at Norrabees 1. The mine commenced with the processing of the stockpiled tailings and has to date not mined the in-situ material. Mining operations have been suspended since October 2024 and remain inactive as of the date of this report.

This report is based on a site inspection conducted on 24 March 2026, with reporting completed on 27 March 2026.

SITE CONDITIONS

Warm sunny days with dry soil conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date	According to site management, no reportable incidents occurred during the audit period, particularly as mining activities have been suspended since October 2024 to date.
Incident No	
Incident	
How Addressed	
When Addressed	

ADOPTED METHODOLOGY
(APPENDIX 7 SUB-REGULATION 3(D)):

COMPLIANCE SCORE	DESCRIPTION
1	Task not achieved
2	Task 20% achieved
3	Task 50% achieved
4	Task 80% achieved
5	Task 100% achieved in accordance with the EMPR
NON-COMPLIANCE SCORE	DESCRIPTION
1	LOW – Mitigation not needed / mitigation measures to be maintained
2	MEDIUM – Mitigation should be considered
3	HIGH – Mitigation compulsory



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

INSPECTION ASPECTS

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
LEGISLATION COMPLIANCE				
National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended 2017)	5	-	Compliant	The Environmental Authorisation for this project was issued by DMPR on 02 September 2022.
Copy of the EA and EMPR available on site	N/A	-	-	Mining ceased in (October 2024) to date, the documents are available at the Permit Holders main office.
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002)	5	-	Compliant	The first renewal application of the mining permit was acknowledged by the DMPR on 12 September 2024, and the second renewal application was submitted in September 2025 pending acknowledgement letter.
Mining permit available on site	5	-	Compliant	A copy of the permit is available at the client office as mining has ceased,
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004)	N/A	-	N/A	The operations at the mine does not trigger the NEM:AQA, 2004.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008)	5	-	Compliant	The Waste Licence was approved on 02 September 2022 as part of the EA.
National Water Act, 1998 (Act 36 of 1998)	N/A	N/A	Mining inactive	No process water is currently used the mine has ceased since October 2024 to date.
Copy of Water Use Authorisation available on site.	N/A	-	-	
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	5	-	Compliant	On the day of the audit the mine was still compliant as no protected plants had to be removed yet. However a permit application is pending with the Department of Agriculture, Environmental Affairs, Rural Development and Land Reform.



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
National Heritage Resources Act. 1999 (Act No 25 of 1999).	3	3	Application in process	Some of the recommendations of the EMPR, regarding the heritage features, were not achieved on site. A heritage specialist was however appointed to apply for a destruction permit from SAHRA. See General Report below.
DEMARCATATION OF SITE (EMPR PG 189)				
Ensure beacons are in place throughout the life of the mine.	1	3	Mining Inactive	The fence that washed away needs to be replaced. The footprint of the mining area must be demarcated to prevent sprawling. .
VISUAL CHARACTERISTICS (VISUAL MITIGATION EMPR PG 189)				
Ensure that the site have a neat appearance and is always kept in good condition.	1	3	Mining Inactive	Oil spills, bags, and plastic waste were observed on site and must be removed and properly disposed of upon commencement.
Store mining equipment in a dedicated area when not in use.	5	-	Compliant	-
Limit vegetation removal, and only strip overburden immediately prior to the mining/use of a specific area.	5	-	Compliant	-
Contain excavations to the approved footprint of the permitted area.	5	-	Compliant	-
Upon closure, rehabilitate the site to ensure that the visual impact on the aesthetic value of the area is reduced to the minimum.	N/A	N/A	N/A	Not yet applicable.
AIR AND NOISE QUALITY (DUST MITIGATION EMPR PG 196 & NOISE MITIGATION EMPR PG 198)				
Control the liberation of dust into the surrounding environment using; inter alia, water spraying and/or other dust-allaying agents.	N/A	N/A	N/A	Mining has been ceased since October 2024 to date.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.	N/A	N/A	Mining Inactive	
Limit speed on the haul roads to 20 km/h and 40 km/h on the access road to prevent the generation of excess dust.	5	-	Compliant	
Minimise areas devoid of vegetation and only remove vegetation immediately prior to mining.	5	-	Compliant	
Install water sprayers at the crusher plant to alleviate dust generation from the conveyor belts.	N/A	N/A	Mining Inactive	
Minimise fines, blowing from the drop end of the crusher plant by attaching strips of used conveyor belts to the conveyor's end.	N/A	N/A	Mining Inactive	
Weekly remove compacted dust from the crusher plant to eliminate the dust source.	N/A	N/A	Mining Inactive	
Flatten loads to prevent spillage during transportation on public roads.	N/A	N/A	Mining Inactive	
Consider weather conditions upon commencement of daily operations. Limit operations during very windy periods to reduce airborne dust and resulting impacts.	N/A	N/A	Mining Inactive	
Ensure dust generating activities comply with the National Dust Control Regulations, GN No R827 promulgated in terms of	N/A	N/A	Mining Inactive	



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
NEM:AQA, 2004 and ASTM D1739 (SANS 1137:2012).				
Implement best practice measures during the stripping of overburden, excavation, and transporting of material from site to minimize potential dust impacts.	N/A	N/A	Mining Inactive	
Ensure that employees and staff conduct themselves in an acceptable manner while on site.	5	-	Compliant	
No loud music may be permitted at the mining area.	5	-	Compliant	
Ensure that all project related vehicles are equipped with silencers and maintained in a road worthy condition in terms of the National Road Traffic Act, 1996.	N/A	-	Mining Inactive	
Plan the type, duration, and timing of the blasting procedures with due cognizance of other land users and structures in the vicinity. Notify the surrounding land users in writing prior to each blasting occasion.	N/A	-	Mining Inactive	
Contract a qualified occupational hygienist to quarterly monitor and report on the personal noise exposure of the employees working at the mine. Monitoring must be in accordance with SANS 10083:2004 (Edition 5) sampling method as well as NEM:AQA 2004, SANS 10103:2008.	N/A	-	Mining Inactive	

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Implement best practice measures to minimise potential noise impacts.	5	-	Mining Inactive	
GEOLOGY AND SOIL (SOIL HANDLING EMPR PG 200)				
Treat any soil as a valuable and essential resource for rehabilitation and manage it carefully to conserve and maintain it throughout the stockpiling and rehabilitation processes.	5	-	Compliant	Topsoil was stripped from the operational areas and is stockpiled on site. Mining has been ceased since October 2024 to date.
Ensure soil stripping, stockpiling, and re-spreading is done in a systematic way. Plan mining in such a way that soil is stockpiled for the minimum possible time.	5	-	Compliant	
Place the soil on a levelled area, within the mining footprint. Do not stockpile soil in undisturbed areas.	5	-	Compliant	-
Protect soil stockpiles against losses by water- and wind erosion. Position stockpiles so it is not vulnerable to erosion by wind and water. The establishment of plants (weeds or a cover crop) on the stockpiles will help to prevent erosion.	3	3	Mining Inactive	Erosion occurred due to stormwater flowing through the mining area. This needs to be addressed should mining recommence.
Keep temporary soil stockpiles free of invasive plant species.	3	3	Mining Inactive	Although mining is currently inactive it should be noted that when mining recommences Alien invasive plants must be eradicated and controlled.
Spread the soil evenly over the rehabilitated area upon closure of the site.	N/A	-	-	Not yet applicable.
Strive to re-instate soil at a time of the year when vegetation cover can be established as quickly as possible afterwards, so that	N/A	-	-	



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
erosion of returned soil is minimized. The best time of year is at the end of the rainy season.				
Monitor the rehabilitated area for erosion, and appropriately stabilize if erosion do occur, for at least 12 months after reinstatement.	N/A	-	-	
HYDROLOGY (EROSION CONTROL AND STORMWATER MANAGEMENT EMPR PG 201)				
Limit clearing of vegetation to the proposed mining footprint and associated infrastructure. Ensure no clearing takes place outside the minimum required footprint.	5	-	Compliant	It remains important to demarcate the mining footprint to ensure compliance with this condition.
Divert stormwater around the soil heaps and mining areas to prevent erosion	1	3	Mining Inactive	Erosion occurred due to stormwater flowing through the mining area. This needs to be addressed should mining recommence.
Protect stockpiles from erosion and store it on flat areas surrounded by appropriate berms where possible.	5	-	Compliant	Although erosion was evident in some of the operational areas, no stockpiles were affected. This needs to be addressed should mining recommence.
Ensure that adequate slope protection is provided when mining within steep slopes.	5	-	Compliant	The slope of the mining area was acceptable on the day of the audit.
Control the outflow of run-off water from the mining excavation to prevent down-slope erosion, by constructing temporary banks and ditches that will direct run-off water (if needed). These must be in place at any points where overflow out of the excavation might occur.	3	3	Mining Inactive	As mentioned earlier, the stormwater management of the site must improve should mining recommence. Mining has been ceased since October 2024 to date



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Regularly monitor roads and other disturbed areas within the project for erosion and ensure problem areas receive follow-up monitoring to assess the success of the remediation.	5	-	Mining Inactive	
Rectify erosion problems within the mining area because of the mining activities immediately (within 48 hours) and monitored thereafter to ensure that it does not re-occur.	5	-	Mining Inactive	
Conduct activity in terms of the Best Practice Guidelines for small-scale mining as developed by DWS.	5	-	Mining Inactive	
Restrict polluting activities including storage of mining fleet, equipment wash down facilities and vehicle maintenance yards to the workshop areas and ensure it takes place on impermeable hard standing surfaces, which formally drain to a dirty water drainage system at the site.	5	-	Mining Inactive	
Contain all fuels and chemicals stored or used on site in fit for purpose containers and store within designated storage areas. Ensure the designated storage areas are situated on an impermeable surface with a perimeter bund and a drainage sump. Size the volume of the bund and sump to contain at least 110% of the total volume of	5	-	Mining Inactive	

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
the fuel and chemicals being stored within the designated storage area.				
TERRESTRIAL BIODIVERSITY, CONSERVATION AREAS AND GROUNDCOVER (VEGETATION MANAGEMENT EMPR PG 136)				
Clearly demarcate the mining boundaries and contain all operations to the approved mining area. Declare the area outside the mining boundaries a no-go area and educate all staff accordingly.	1	3	Mining Inactive	The fence that washed away needs to be replaced. The footprint of the mining area must be demarcated to prevent sprawling should mining recommence. Mining has been ceased since October 2024 to date.
Obtain permits for the removal of protected plant species and keep it on-site in the possession of the flora search and rescue team.	5	3	In Process	The permit holder is in the process of obtaining the required permits. However, to date no protected plants had to be removed.
Arrange a pre-commencement environmental induction for all staff on site to ensure that basic environmental principles are adhered to. This must include awareness of no littering, appropriate handling of pollution and chemical spills, avoiding fire hazards, minimising wildlife interactions, remaining within demarcated construction areas, etc.	5	-	Compliant	Mining has been ceased since October 2024 to date should mining recommence inductions will be done again.
Only commence with bush-clearance once the plant permits were obtained, and the protected plants successfully relocated by an appropriately qualified person.	5	3	In Process	Mining has been ceased since October 2024 to date.
The on-site ECO must provide supervision and oversight of vegetation clearing	5	-	Compliant	

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

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activities and other activities which may cause damage to the environment, especially during the site establishment phase, when most of the vegetation clearing is taking place.				
Ensure all vehicles remain on demarcated roads and prevent unnecessary driving in the veld outside these areas.	5	-	Compliant	
Do not translocate, uproot, or disturb plants for rehabilitation or other purposes without express permission from the ECO and without the relevant permits.	N/A	-	-	
Do not allow fires on-site.	5	-	Compliant	
Reseed all cleared areas that are no longer or not required for drilling activities with locally sourced seed of suitable species. Also consider the packing of bare areas with brush removed from other parts of the site to encourage natural vegetation regeneration and limit erosion.	N/A	-	-	
TERRESTRIAL BIODIVERSITY, CONSERVATION AREAS AND GROUND COVER (INVADER PLANT MANAGEMENT EMPR PG 137)				
Implement an invasive plant species management plan to control all invasive plant species on site in terms of NEM:BA, 2004 and CARA, 1983. Do weed/alien ongoing clearing on throughout the life of the mining activities.	5	-	Compliant	-



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Do not allow planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose.	5	-	Compliant	-
Keep all stockpiles (topsoil & overburden) free of invasive plant species.	3	3	Inactive Mining	Although mining is currently inactive it should be noted that when mining recommences Alien invasive plants must be eradicated and controlled.
Control declared invader or exotic species on the rehabilitated areas.	N/A	-	-	Not yet applicable.
FAUNA (FAUNA MANAGEMENT EMPR PG 137)				
Ensure no fauna is caught, killed, harmed, sold, or played with.	5	-	Mining Inactive	Mining has been ceased since October 2024 to date
The ECO or other suitably qualified person must remove any fauna directly threatened by the operational activities to a safe location.	N/A	-		
Arrange that all personnel undergo environmental induction regarding fauna management and in particular awareness about not harming or collecting species such as snakes, tortoises, and owls. Instruct workers to report any animals that may be trapped in the working area.	5	-		
Ensure no snares are set or nests raided for eggs or young.	5	-		
Ensure all vehicles adhere to a low-speed limit (40 km/h is recommended) to avoid collisions with susceptible species such as snakes and tortoises.	5	-		

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Prevent litter, food or other foreign material thrown or left around the site. Keep such items in waste bins with lids at the processing area.	5	-		
CULTURAL AND HERITAGE ENVIRONMENT (ARCHAEOLOGICAL, HERITAGE AND PALAEOONTOLOGICAL ASPECTS EMPR PG 138)				
Confine all mining to the development footprint area.	5	-	Compliant	Mining has been ceased since October 2024 to date, should mining commence demarcation must be prioritized prior to commencement.
Arrange for the documentation (scaled mapping of the mining-related structures at Norrabees 1 and 2.	3	3	In Process	A heritage specialist is in the process of the permit application to SAHRA.
After documentation of Features 1 and 2, obtain a destruction permit from Ngwao-Boswa Jwa Kapa Bokone (Northern Cape PHRA) prior to this area being worked.	3	3		
Maintain a 30 m buffer around Feature 3 to preserve it <i>in situ</i> and avoid any damage to the feature.	3	3		
Demarcate and avoid Feature 4 during mining activities.	3	3		
Ensure ECO monitor the project.	5	-	Mining Inactive	The ECO must ensure compliance of the site with all heritage related conditions, should mining recommence.
Implement a change find procedure when discoveries are made on site.	N/A	-		Mining has been ceased since October 2024 to date,
Implement a fossil change find procedure when discoveries are made on site.	N/A	-		



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
EXISTING INFRASTRUCTURE (ACCESS ROAD MANAGEMENT EMPR PG 140)				
When applicable, divert storm water around the access road to prevent erosion.	3	3	Mining Inactive	Mining has been ceased since October 2024 to date, should mining recommence the stormwater control of the site needs to be improved.
Restrict vehicular movement to the existing access road to prevent crisscrossing of tracks through undisturbed areas.	5	-		
Repair rutting and erosion of the access road caused as a direct result of the mining activities.	5	-		
Prevent the overloading of the trucks and file proof of load weights for auditing by relevant officials.	5	-		
Restrict the speed of all mining equipment/vehicles to 40 km/h on the access roads.	5	-		
GENERAL (WASTE MANAGEMENT EMPR PG 140)				
Ensure regular vehicle maintenance, repairs and services only take place at the workshop and service area. Ensure drip trays are present if emergency repairs are needed on equipment not able to move to the workshop. Dispose all waste products in a closed container/bin to be removed from the emergency service area (same day) to the workshop to ensure proper disposal. Treat this as hazardous waste and dispose of it at a registered hazardous	5	-	Mining Inactive	Mining operations ceased in October 2024 and the site remains inactive (care and maintenance).However, oil spills were noted on site and should be cleaned.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
waste handling facility, alternatively arrange collection by a registered hazardous waste handling contractor. File safe disposal certificates for auditing purposes.				
If a diesel bowser is used on site, always equip it with a drip tray. Use drip trays during each refuelling event. The nozzle of the bowser needs to rest in a sleeve to prevent dripping after refuelling.	5	-		
Ensure drip trays are cleaned after each use. Do not allow dirty drip trays to be used on site. Dispose of dirty rags used to clean the drip trays as hazardous waste into a designated bin at the workshop, where it is incorporated into the hazardous waste removal system.	5	-		
Collect any effluents containing oil, grease or other industrial substances in a suitable receptacle and remove it from the site, either for resale or for appropriate disposal at a recognized facility. File proof.	5	-		
Obtain an oil spill kit and train the employees in the emergency procedures to follow when a spill occurs as well as the application of the spill kit.	5	-		
Clean spills immediately, within two hours of occurrence, to the satisfaction of the	1	3		

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Regional Manager DMPR by removing the spillage together with the polluted soil and containing it in a designated hazardous waste bin until it is disposed of at a recognised facility. File proof.				
Ensure suitable covered receptacles are always available and conveniently placed for the disposal of general waste.	5	-		
Store non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., in a container with a closable lid at a collecting point to be collected at least once a month and disposed of at a recognized landfill site. Take specific precautions to prevent refuse from being dumped on or in the vicinity of the mine area. File proof of disposal.	5	-		
Handle biodegradables as indicated above.	5	-		
Encourage re-use or recycling of waste products.	5	-		
Do not bury or burn waste on the site.	5	-		
Provide ablution facilities in the form of a chemical toilet/s. Anchor the chemical toilet (to prevent blowing/falling over) and arrange that it is serviced at least once a week for the duration of the mining activities by a registered liquid waste	5	-		

**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
handling contractor. File the safe disposal certificates.				
Ensure that the use of any temporary, chemical toilet facilities do not cause any pollution to water sources or pose a health hazard. In addition, ensure that no form of secondary pollution arise from the disposal of refuse or sewage from the temporary, chemical toilets. Address any pollution problems arising from the above immediately.	5	-		
Do not discharge water containing waste into the natural environment.	5	-		
Implement measures to contain the wastewater and safely dispose thereof.	5	-		
Report any significant spillage of chemicals, fuels etc. during the lifespan of the mining activities to the Department of Water and Sanitation and other relevant authorities.	N/A	-		
Implement the use of waste registers to keep record of the waste generated and removed from the mining area.	5	-		The use of waste registers to be implemented should mining recommence.
GENERAL (STORAGE/HANDLING OF HAZARDOUS SUBSTANCES/CHEMICALS EMPR PG 142)				
Place chemical storage areas on level ground to prevent offsite migration of any spilled product.	5	-	Mining Inactive	-



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Ensure that the floor of the storage area is impermeable to prevent seepage of spilled products into the ground or ground water.	5	-		-
Control access to the chemicals/substances and implement a notification system of an appropriate staff member.	5	-		Access is controlled to the storeroom where the chemicals are stored.
Maintain a Hazardous Substances Register and keep Safety Data Sheets (SDS) current for all chemicals used on site.	5	-		Should mining recommence the stores will be accessed and audited.
Ensure any fuel/used oil tanks have secondary containment in the form of an impermeable bund wall and base within which the tanks sit, raised above the floor, on plinths. Check that the bund capacity is sufficient to contain 110% of the tank's maximum capacity. Ensure that the distance and height of the bund wall relative to that of the tank is taken into consideration to ensure that any spillage does not result in hydrocarbons/other substances spouting beyond the confines of the bund.	5	-		-
Establish a formal inspection routine to check all equipment in the bund area, as well as the bund area itself for malfunctions or leakages. Inspect the bund area at least weekly and remove any accumulated	5	-		-



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
rainwater and hand it as contaminated water. Check all valves and outlets to ensure that its intact and closed securely.				
Ensure that the bund base slope towards an oil sump of sufficient size. Do not allow contaminated water to mix with clean water and contain it until it is collected by a registered hazardous waste handling contractor or disposed of at a registered hazardous waste handling facility.	5	-		Mining operations ceased in October 2024, and the site remains inactive (care and maintenance).
Use drip trays under all stationary equipment or vehicles. Place used drip trays within a bunded area and do not store on the bare soil. Discard the wastewater originating from the cleaning of drip trays into the oil sump.	5	-		
GENERAL (HEALTH AND SAFETY ASPECTS EMPR PG 143)				
Ensure that workers have access to the correct PPE as required by law.	5	-	Mining Inactive	Mining operations ceased in October 2024, and the site remains inactive (care and maintenance).
Locate sanitary facilities within 100 m from any point of work.	5	-		
Manage all operations in compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).	5	-		
Plan the type, duration, and timing of blasting with due cognizance of other land users and structures in the vicinity.	5	-		



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Inform the surrounding land users and communities in writing ahead of any blasting event.	5	-		
Monitor the compliance of ground vibration and airblast levels to USBM standards with each blasting event.	5	-		
Record all blasts with a vibro recorder.	5	-		
Give audible warning of a pending blast at least 3 minutes in advance of the blast.	5	-		
Limit fly rock and collect and remove flyrock and rock spill that falls beyond the working area.	5	-		



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/10950 MP**

COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S

(APPENDIX 7 SUB-REGULATION 3(G) & (J)):

According to site management no written environmental related complaints were received during the audit period.

AUDITING OF EA, EMPR AND REPORTING THEREOF

(REGULATION 34):

Date of previous EAR/EPA:	The previous EPA was conducted in September 2025.
Proof of submission to DMPR available:	The previous EPA was submitted (as part of the permit renewal application) to the DMPR on 23 September 2025.
EAR/EPA compiled by independent person with environmental auditing expertise:	This report was compiled by Mrs. Murchellin Saal from Greenmined Environmental (Pty) Ltd that is a registered EAP with EAPASA.
Potential and registered I&AP's notified within 7 days of the submission date, and report available on publicly accessible website	The report will be available on the Greenmined website for public viewing.

GENERAL REPORT

Compliance of the mining site with the approved EMPR was reviewed during the site assessment. The mining area recorded a compliance score of 77 for the audit period.

As mentioned earlier, mining ceased temporarily in October 2024 to date. Security guards continue to protect the mining infrastructure, but all other employees left the mine. Mining has to date only entailed the reworking of previously stockpiled tailings, and no mining progressed into the excavations.

Since the 2025 EPA, a mining permit with reference number: NC 30/5/1/3/2/11135 MP was approved by the DMPR in February 2025. The permit holder is Norrabees Lithium (Pty) Ltd, and the 11135 MP permit encompasses the 10950 MP permit to the north, east and south.

Hazardous Substances and Waste Handling:

On the day of the audit, no documents confirming the safe disposal of general or hazardous waste could be audited. It is proposed that site management start the use of waste registers (even though the site currently produces very low amounts of waste) that could be audited on request.

All hydrocarbons and chemicals must be stored in bunded areas that comply with the specifications of the EMPR, and drip trays must be present under all stationary machinery/vehicles. The hydrocarbon spills must be cleaned, and the contaminated soil must be treated as hazardous waste. Site management must ensure that the generator/s are fitted

with drip trays and that the drip trays are monitored and regularly emptied. The mixing of general and hazardous waste may not be allowed, and the separate storage containers must be clearly marked.

Protected Plants:

An application for a plant destruction/removal permit has been pending with DAERL since November 2023 and is being followed up on regularly. However, to date no protected plants had to be removed from the mining area.

Heritage Resources:

On the day of the audit, Feature 3 (identified during the EIA process) was intact, and a buffer were placed around it. A heritage specialist is in the process of apply for a destruction permit for Features 1 & 2, as Feature 1 has been covered with tailings since 2023 and Feature 2 is used as platform for the sorting plant. Mining has not yet progressed to Feature 4 and no disturbance occurred.

Stormwater Management:

The area experienced heavy downpours during the audit period, which led to stormwater flowing through the stockpile area and damaging the security fence. The erosion that ensued must be addressed and the areas landscaped. The boundary fence must be repaired, and the stormwater management of the mine must be improved. It is especially important that clean runoff water be diverted around the chemicals/hydrocarbon storage and parking areas.

DOCUMENT CHECKLIST:

- | | | |
|---|---|---|
| • Environmental Management Programme | - | Present at Permit Holder’s office |
| • Mining Permit | - | Present at Permit Holder’s office |
| • Environmental Authorisation | - | Present at Permit Holder’s office |
| • Regulation 2(2) Mine Plan | - | Present at Permit Holder’s office |
| • Financial Provision Calculation | - | 2024 Document present at Permit Holder’s office |
| • Environmental Assessment Report | - | 2024 Document present at Permit Holder’s office |
| • Incidents/Accidents Register | - | To be kept on site; however, there is currently no personnel or security present on site. |
| • Complaints Register | - | To be kept on site; however, there is currently no personnel or security present on site. |
| • Environmental Awareness Training | - | Proof of initial inductions available at Permit Holder’s office |
| • Proof of Waste Disposal | | |
| ○ General Waste | - | Absent |
| ○ Hazardous Waste | - | Absent |
| ○ Liquid Waste | - | Absent |
| • Material Safety Data Sheets | - | To be added to the site file |
| • Plant relocation and transport permit | - | Proof of pending application present at Permit Holder’s office |
| • Heritage Permit | - | Proof of application to be filed by Permit Holder. |

MATTERS TO BE ADDRESSED:

- Submission of the application for destruction of the heritage features to NC-PHRA as soon as possible and manage heritage features in accordance with the EMPR.
- Do not remove any protected plants prior to receipt of the DAERL permit.
- Demarcate the mining footprint to prevent sprawling.

- Reinstate the erosion that occurred on site and improve stormwater control structures to prevent clean water flowing over dirty areas.
- Clean all hydrocarbon spills and dispose of the contaminated soil as hazardous waste. File proof.
- Equip all stationary machinery/vehicles and generators with drip trays that are constantly monitored.
- Repair the site fence.
- Place an oil spill kit on site and train employees in its application.
- Place signs on the general- and hazardous waste bins to prevent mixing of waste and fit all bins with lids.
- Implement the use of waste registers to proof safe disposal of all waste generated on site.
- Ensure the site has a Complaints Register and Incident Register that is always available.

ABILITY OF EMPR TO ADEQUATELY MANAGE OR MITIGATE ENVIRONMENTAL IMPACTS & NEED FOR AMENDMENT OF THE EMPR (APPENDIX 7 SUB-REGULATION 3(E)):


It is believed that the EMPR adequately manage and/or mitigate environmental impacts at the mining area, and no need was identified to amend the EMPR.

FINANCIAL PROVISION:

This report is accompanied by a reassessment of the financial provision calculation for the year 2026 that amounts to R 493 950,71

The 2026 financial provision does not exceed the value of financial guarantee of R496 729.77 in place at the DMPR, and the Permit Holder does not need to provide a shortfall amount.

ECO SIGNATURE

NAME	SIGNATURE	DATE
Murchellin Saal		26 March 2026

PHOTOGRAPHS

PHOTOGRAPHS

MINE AREA



SECURITY HOUSE



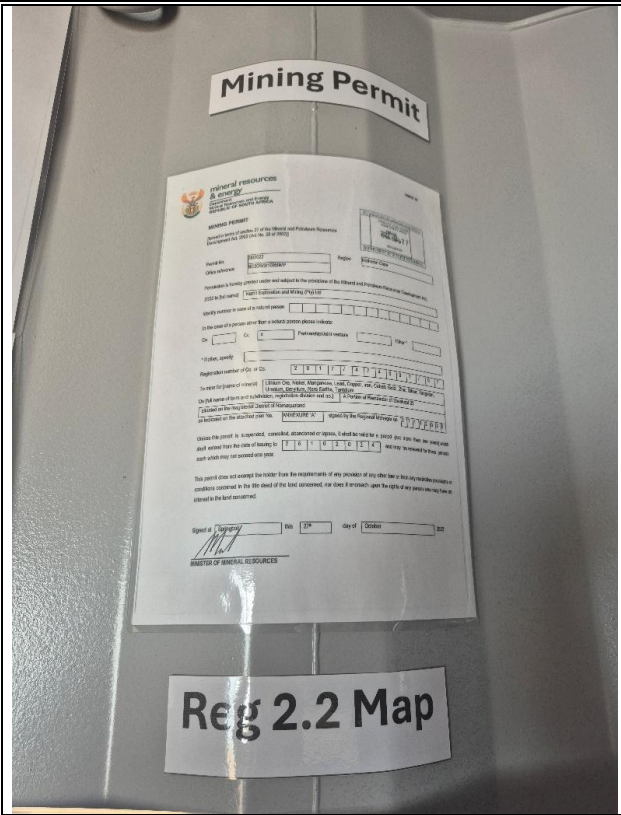
SPILLAGE AREAS AND POOR HOUSEKEEPING



STORAGE BUILDING AREA

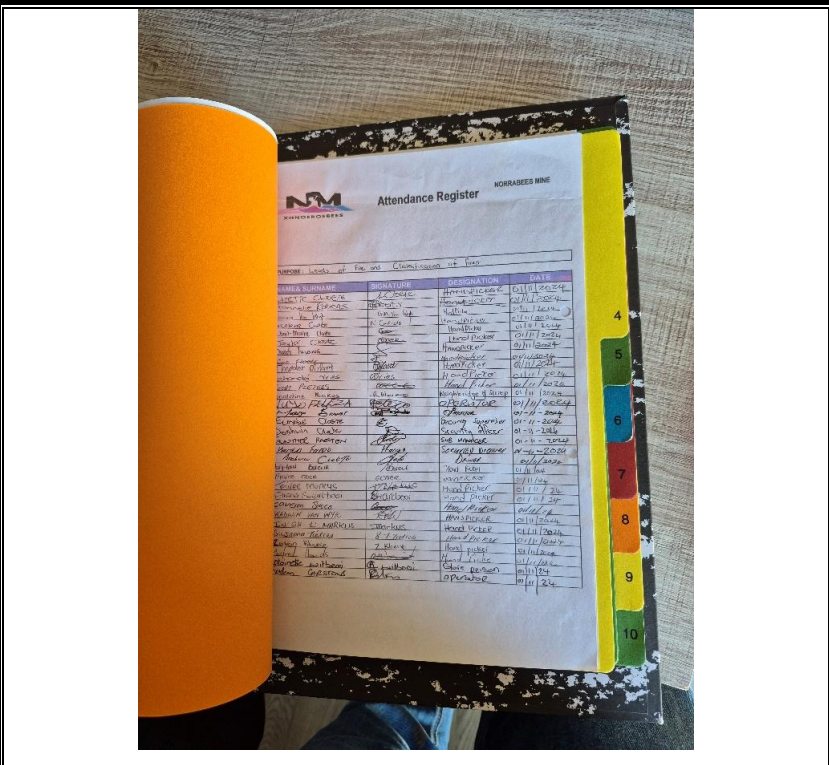
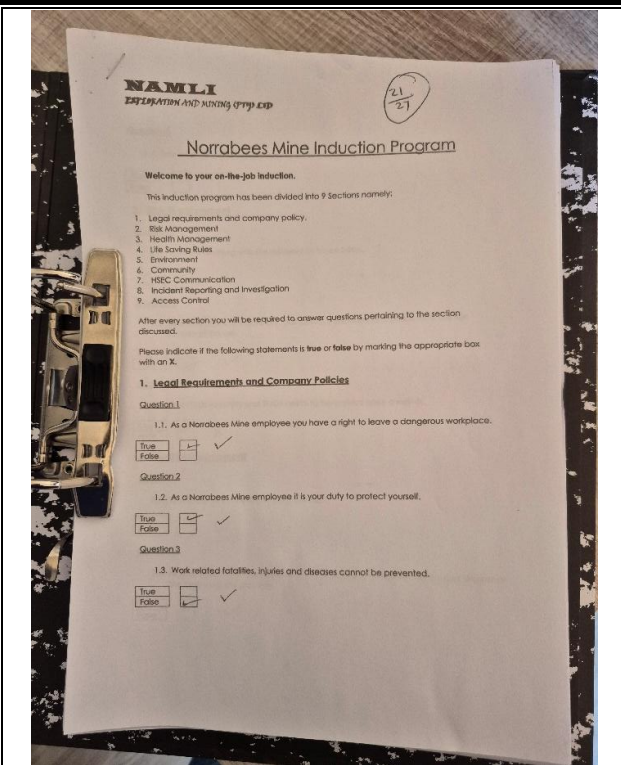


PROOF OF DOCUMENTATION



Copy of Mining Permit on site

Proof that the chemical toilet was serviced (November 2024)



Proof of inductions and toolbox talks