

PROSPECTING RIGHT OVER THE REMAINING EXTENT OF THE FARM STEINKOPF NO 22 NAMAQUALAND MAGISTERIAL DISTRICT, NORTHERN CAPE PROVINCE

ENVIRONMENTAL PERFORMANCE ASSESSMENT

DMPR REFERENCE NUMBER:	NC 30/5/1/1/2/11823 PR
AUDIT PERIOD:	SEPTEMBER 2023 – SEPTEMBER 2025

PREPARED FOR:

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PREPARED BY:

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1. PROJECT SPECIFIC DETAIL

ITEM	PROSPECTING RIGHT HOLDER
Company Name	Namli Exploration and Mining (Pty) Ltd
Contact Person	Mr. Abongile Mdingi
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ITEM	CONSULTANT DETAIL
Company Name	Greenmined Environmental (Pty) Ltd
Contact Person	Christine Fouché
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E-mail Address	Christine.f@greenmined.co.za
Postal Address	Postnet Suite 62 Private Bag x15 Somerset West 7129

ITEM	LOCATION AND AREA INFORMATION
Site Name	Steinkopf Prospecting Right
Property Description	Remaining Extent of Steinkopf No 22
Location	The prospecting site is located over a vast area bordering the town of Steinkopf to the north and east.
Size of Area	167 536.4762 ha

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2. ENVIRONMENTAL AUDIT REPORT

PROJECT DETAIL

Right Number	NC 30/5/1/1/2/11823 PR	Date of Commencement	22 November 2017
Site Name	Steinkopf Prospecting Right	Inspection Date	29 April 2025
Right Holder	Namli Exploration and Mining (Pty) Ltd	Other Authorisations	Not Applicable
Report Number	03		

DETAIL OF AUDITOR

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

ECO	Christine Fouché
EXPERTISE	Ms Fouche has a Diploma in Nature Conservation and a BSc in Botany and Zoology with nineteen years experience in environmental impact assessments and compliance monitoring in South Africa. Ms Fouché is a registered Environmental Assessment Practitioner (registration no: 2019/1003) with EAPASA (Environmental Assessment Practitioners Association of South Africa).
DECLARATION OF INDEPENDENCE	<p>I, Christine Fouche, in my capacity as environmental control officer 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). <p><i>Christine Fouché</i></p> <p>Signature of ECO</p> <p>Date: 16 September 2025</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 prospecting activities with the Environmental Management Plan (EMP) as approved by the Department of Mineral and Petroleum Resources.

INSPECTED AREAS:

The inspection included an assessment of the following areas:

- Access road, and
- Representative areas where prospecting took place during the audit period.

To establish the environmental compliance assessment of the operation, the prospecting site was inspected by the Environmental Control Officer, Christine Fouché, of Greenmined Environmental (Pty) Ltd.

ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE

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

The assumptions made in this document, stem from specific information gathered during the site audit and background information gathered from site management. At the time of the inspection, prospecting activities had temporarily ceased, and the site was non-operational. In addition, most site-related documents had been removed from the mine. As a result, the inspection could only rely on direct observations and discussions with available safety personnel.

LOCATION

Site Location	The prospecting area is located over ±167 536 ha that borders the town of Steinkopf to the north and east.
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Site Coordinates

	G1	18,095967	-29,157048
	G2	17,779006	-29,183862
	G3	17,645899	-29,149932
	H	18,130561	-28,898795
	H1	18,085385	-29,267343
	H2	17,777055	-29,188336
	H3	17,633954	-29,157165
	J	18,145552	-28,895226
	J1	17,99034	-29,289705
	J2	17,775532	-29,200281
	J3	17,631717	-29,155167
	K	18,151929	-28,89613
	K1	17,933611	-29,313091
	K2	17,778339	-29,200472
	K3	17,630099	-29,15293
	L	18,163826	-28,900937
	L1	17,892278	-29,324984
	L2	17,773914	-29,213178
	L3	17,622485	-29,148458
	M	18,16692	-28,90155
	M1	17,870977	-29,310536
	M2	17,763444	-29,221887
	M3	17,616239	-29,145792
	N	18,169347	-28,903459
	N1	17,857328	-29,317217
	N2	17,754783	-29,224409
	N3	17,614752	-29,146981
	P	18,175438	-28,906885
	P1	17,851617	-29,297687
	P2	17,691204	-29,205992
	P3	17,612907	-29,136869
	Q	18,184956	-28,916784
	Q1	17,840767	-29,290434
	Q2	17,684256	-29,195332
	Q3	17,59643	-29,111587
	R	18,187981	-28,918923
	R1	17,839396	-29,281354
	R2	17,6824	-29,193333
	R3	17,595835	-29,107958
	S	18,188723	-28,919932
	S1	17,845964	-29,26091
	S2	17,680877	-29,189907

	S3	17,594169	-29,104984
	T	18,189361	-28,921578
	T1	17,84248	-29250117
	T2	17,677736	-29,187194
	T3	17,584711	-29,104448
	U	18,189104	-28,921835
	U1	17,844631	-29,241636
	U2	17,617787	-29,192429
	U3	17,581618	-29,108731
	V	18,189351	-28,926004
	V1	17,853768	-29,224552
	V2	17,666124	-29,188955
	V3	17,58251	-29,096894
	W	18,18978	-28,929059
	W1	17,835209	-29,222839
	W2	17,666933	-2918491
	W3	17,579892	-29,090648
	X	18,193225	-28,933647
	X1	17,823026	-29,208419
	X2	17,668218	-29,180722
	X3	17,51727	-29,098076
	Y	18,203409	-28,938092
	Y1	17,814936	-29,203803
	Y2	17,675737	-29,175154
	Y3	17,483393	-29,116529
	Z	18,179954	-29,011306
	Z1	17,812128	-29,194999
	Z2	17,679116	-29,170586
	Z3	17,483393	-29,116529

PROJECT DESCRIPTION

Some prospecting took place during the audit period with the main samples removed from the north to north-eastern portion of the prospecting right area. On the day of the audit no prospecting was in process.

The Right Holder lodged two Section 102 Applications with the DMRE to remove the mining permit areas that were approved within the prospecting right footprint (NC-00160-PR/102), and to add minerals to the prospecting right (NC-00183-PR/102). The first Section 102 application was approved with the approval of the mining permits within the footprint, while the status of the second Section 102 application is uncertain.

The exploration program include the drilling of the mapped and sampled pegmatites and the identification and mapping of additional pegmatites. Prospecting temporarily ceased in October 2024.

SITE CONDITIONS

Hot windless day with dry soil conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date:	According to site management no environmental incidents occurred during the audit.
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 EMP

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 PROSPECTING

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	-
Copy of the EA and EMP available on site.	N/A	-	-	The PR holder keeps a copy at the office since there was no prospecting at the time of the inspection.
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002).	5	-	Compliant	-
Prospecting right available on site.	5	-	Compliant	These copies are available at the site offices of the nearby Namli Exploration and Mining (Pty) Ltd mining permit with reference number: NC 30/5/1/3/2/10950 MP.
Copy of the approved prospecting plan available on site (Reg 2(2)/Reg 42)	5	-	Compliant	
National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004).	N/A	-	-	Prospecting did not trigger any of these acts.
National Environmental Management: Waste Act, 2008 (Act No 59 of 2008).	TBC	-	-	This will be confirmed once prospecting recommences.
National Water Act, 1998 (Act 36 of 1998) (NWA).	TBC	-	-	
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA).	5	-	Compliant	According to site management no trees/bushes had to be removed to allow the prospecting activities, and no listed weeds/invaser plants (in terms of the AIS Regulations) were noted in the work areas.
Hazardous Substances Act, 1973 (Act 15 of 1973).	N/A	-	-	Not applicable as there was no chemicals on site.
TOPSOIL MANAGEMENT:				
Topsoil stripping.	1	3	Management to be intensified	Topsoil was not stripped from the prospecting areas that were visited on the day of the audit.
Topsoil storage/stockpiling.	1	3		
Topsoil returned to rehabilitated area.	N/A	-	-	None of the areas visited in 2025 where rehabilitated yet.
VEGETATION:				
Protected plants (if any) sheltered from prospecting activities.	N/A	-	-	According to site management the prospecting activities did not affect any protected plant species.

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Aliens & weeds controlled on site.	5	-	Compliant	No problem plants were noted on site.
No crisscrossing through undisturbed areas.	5	-	Compliant	This appeared true on the day of the audit.
FAUNA:				
All animals, birds and reptiles protected on site.	5	-	Compliant	According to site management this is implemented.
Boreholes covered to prevent trapping of animals.	3	3	To be addressed	Some of the boreholes were not covered on the day of the audit.
AIR QUALITY & NOISE:				
Dust suppression implemented.	N/A	-	-	These matters could not be audited on the day of the audit, as no prospecting was taking place, and will have to be confirmed once prospecting recommences.
Speed of vehicles controlled to lessen dust generation and road deterioration.	N/A	-	-	
Noise controlled on site.	N/A	-	-	
Hearing protection available to employees.	N/A	-	-	
ARCHAEOLOGICAL AND CULTURAL INTEREST:				
Archaeological and/or cultural remnants protected.	N/A	-	-	According to site management no archaeological or cultural remnants were discovered during the prospecting activities.
SURFACE WATER:				
Erosion, caused by prospecting activities, controlled on site.	N/A	-	-	No areas of concern were noted at the time of the inspection.
No servicing of vehicle on site, and/or drip trays used during emergency break downs.	N/A	-	-	Not applicable during the inspection, as no prospecting was in progress and all related vehicles left the site.
VISUAL EXPOSURE:				
Is the contractor implementing good visual and housekeeping standards.	4	3	To be addressed	The prospected areas need to be reinstated, and all open boreholes must be covered.
MANAGEMENT OF FUEL AND HAZARDOUS PRODUCTS:				
Hazardous material stored within a bunded area (110% capacity).	N/A	-	-	No hazardous material was stored on site during the inspection.
Management of fuel and oil spills.	N/A	-	-	No oil/fuel spills were noted on site.
Drip trays present when refuelling is done outside a service bay.	N/A	-	-	None of these conditions were applicable during the site inspection as there was no prospecting in progress.
Sealed drip trays used and managed on site.	N/A	-	-	
Prospecting equipment mechanically sound without visible oil leaks.	N/A	-	-	
Oil spill kit available on site.	N/A	-	-	

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
WASTE MANAGEMENT:				
Site free of day-to-day litter.	5	-	Compliant	-
Waste collected in sealable containers.	N/A	-	-	-
General waste dumped at a recognised landfill site.	TBC	-	-	When prospecting recommences, the prospecting team must validate the location of the general waste disposal.
Hazardous waste removed by a registered waste handling contractor.	N/A	-	-	According to site management there has not been any hazardous waste because of the prospecting activities.
Spillages not disposed of into the environment, ditches, drains or water courses.	5	-	Compliant	No signs was seen of contaminated soil disposed into the environment.
Proof of waste disposal on site.	1	3	To be addressed	Proof of safe disposal of all waste must be available for auditing purposes.
No waste stockpile allowed in- or outside the boundaries of the prospecting area.	5	-	Compliant	There are no waste stockpiles on site.
Sanitation facilities available to employees.	N/A	-	-	No prospecting at the time of the inspection.
FIRE MANAGEMENT:				
Firefighting equipment available on-site.	N/A	-	-	-
No open fires allowed on site.	N/A	-	-	-
Major fires or explosions reported.	N/A	-	-	-
EQUIPMENT MANAGEMENT:				
Prospecting contained to the approved area.	5	-	Compliant	-
Unnecessary surface disturbance avoided.	5	-	Compliant	-
Progressive rehabilitation implemented as prospecting continues.	2	3	To be addressed	All open boreholes must be capped and rehabilitated.
ACCESS ROADS AND VEHICLES MANAGEMENT:				
Access road maintained.	5	-	Compliant	-
Movement of project related vehicles and machinery restricted to the approved prospecting area. No crisscrossing through undisturbed areas.	5	-	Compliant	This appeared to be true as no signs of crisscrossing was noticed during the inspection.
Vehicle repairs only conducted in service bay area, and waste products disposed of in containers/bins.	TBC	-	-	To be confirmed once prospecting recommences.
Speed limit enforced within the area.	TBC	-	-	

ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF PROSPECTING

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
EMPLOYEE AND SAFETY MANAGEMENT:				
Workers inducted and informed of EMP conditions.	TBC	-	-	As the prospecting team were not on site during the inspection, this could not be confirmed.
Proof of training available.	TBC	-	-	
Workers provided with PPE.	TBC	-	-	

ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF PROSPECTING

COMMENTS OR COMPLAINTS RECEIVED FROM I&AP'S **(APPENDIX 7 SUB-REGULATION 3(G) & (J)):**

No written environmental related complaints were received during the audit period.

AUDITING OF EMP AND REPORTING THEREOF **(REGULATION 34):**

Date of previous EAR/EPA:	The previous EPA was compiled in September 2023.
Proof of submission of previous EAR/EPA to DMPR available:	To be confirmed.
EAR/EPA compiled by independent person with environmental auditing expertise:	Greenmined Environmental (Pty) Ltd compiled this EPA.
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 made available on the Greenmined website.

GENERAL REPORT

Compliance of the prospecting area with the EMPR was reviewed during the site assessment. The prospecting area recorded a compliance score of 83% for the audit period.

Sampling took place in various areas mainly contained to the north and north-eastern part of the prospecting area during the audit period.

As mentioned earlier, no prospecting was in progress on the day of the audit, and it is important that site management ensure all boreholes are capped to prevent animals falling in. The rehabilitation of the prospected areas must commence as soon as possible.

DOCUMENT CHECKLIST:

At the time of the inspection no invasive prospecting took place and therefore the only documents that were available on site were the prospecting right and prospecting plan. The PR holder however keeps the relevant documents at the company offices.

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MATTERS TO BE ADDRESSED:

1. In future, strip topsoil before an area is prospected. The topsoil must be stockpiled and protected for use during the rehabilitation phase.
2. Cap/close all boreholes.
3. File proof of safe disposal of all waste generated on site.

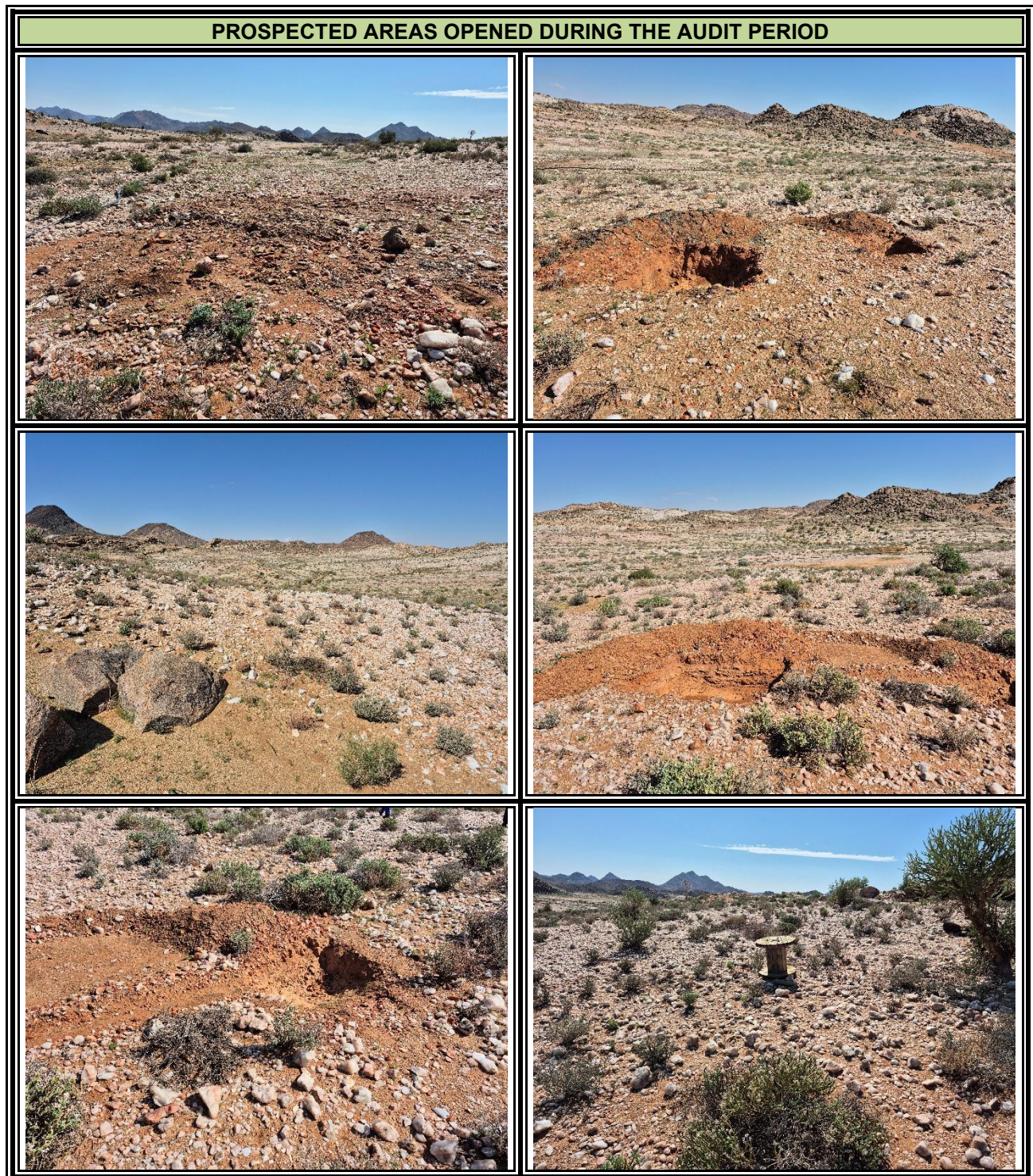
FINANCIAL PROVISION:

This report is accompanied by a reassessment of the financial provision calculation for the year 2025 that amounts to R 84 777.48. The 2025 financial provision does not exceed the value of financial guarantee in place at the DMRE, and the Right Holder does not need to provide a shortfall amount.

ECO SIGNATURE

NAME:	SIGNATURE:	DATE:
Christine Fouché	<i>Christine Fouché</i>	16 September 2025

PHOTOGRAPHS



ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF PROSPECTING

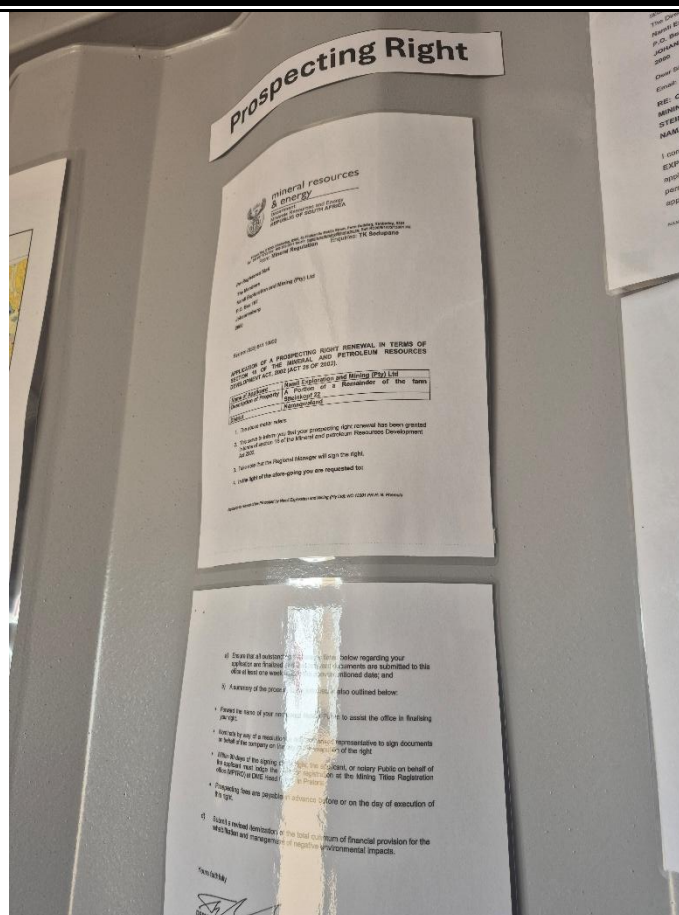


Capped borehole

Road in prospecting area

ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF PROSPECTING

PROOF OF DOCUMENTS

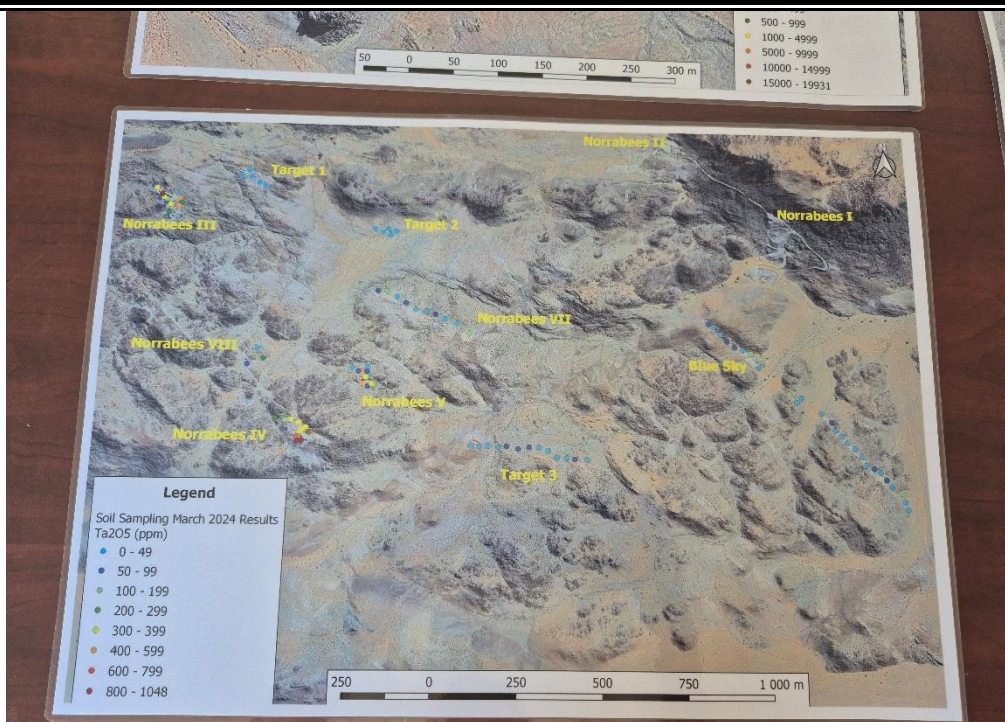
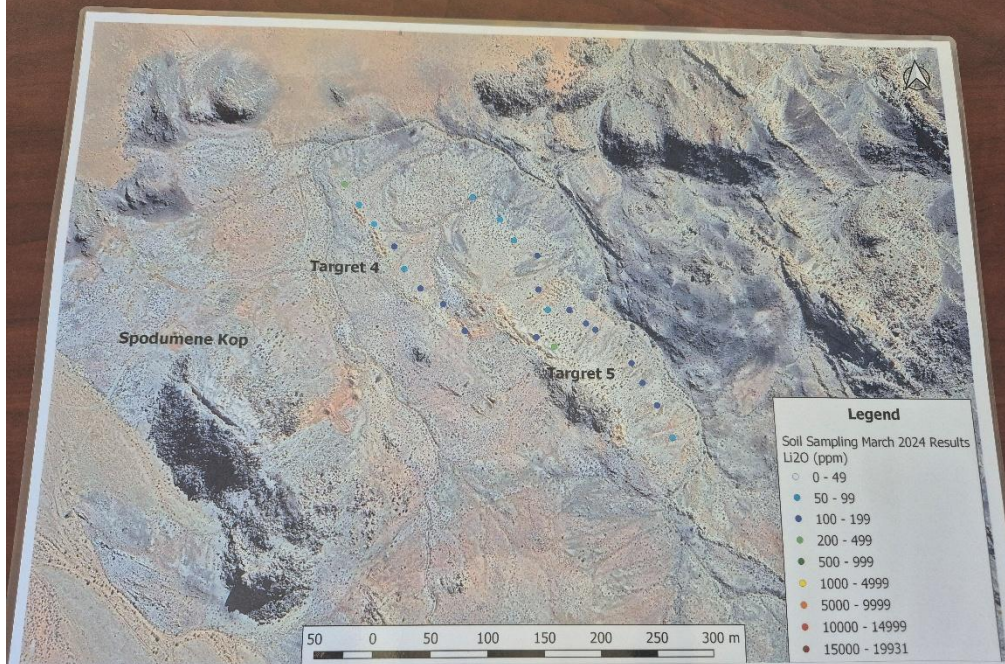


Prospecting right at site office



Prospecting plan at site office

ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF PROSPECTING



Prospected areas up to March 2024



ENVIRONMENTAL PERFORMANCE ASSESSMENT

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