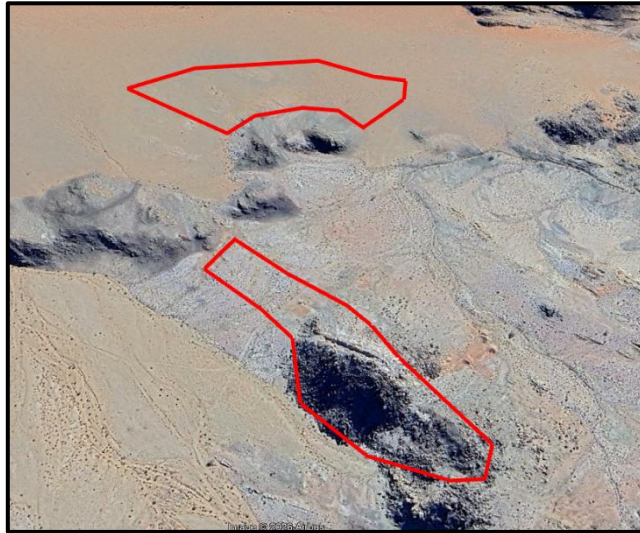


**SPODUMENE KOP (SA) LTD,
PORTION OF THE FARM STEINKOPF NO. 22, NAMA KHOI MUNICIPAL
AREA, NORTHERN CAPE PROVINCE**



ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT

DMPR REFERENCE NUMBER	NC30/5/1/3/2/11136MP
AUDIT PERIOD	March 2026

Prepared For:
Spodumene Kop (SA) Ltd
Contact Person: Mr J Lumley
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Prepared By:
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7129



1. PROJECT SPECIFIC DETAIL

ITEM	MINING PERMIT HOLDER
Company Name	Spodumene Kop (SA) Ltd
Contact Person	Mr J Lumley
Tel Number	082 596 9748
Cell Number	082 596 9748
E-mail Address	james@continentalafriicali.com
Postal Address	Block E River Court, 6 St, Denis, Port Louis, Mauritius
ITEM	CONSULTANT DETAIL
Company Name	Greenmined Environmental (Pty) Ltd
Contact Person	Murchellin Saal
Tel Number	021 851 2673
Cell Number	076 792 6327
E-mail Address	Murchellin.s@greenmined.co.za
Postal Address	Postnet Suite 62 Private Bag x15 Somerset West 7129
ITEM	LOCATION AND AREA INFORMATION
Site Name	Spodumene Kop
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 SPODUMENE KOP PERMIT NC30/5/1/3/2/11136MP

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Whilst every endeavour has been made by the Greenmined to ensure that information provided is correct and relevant, this report is, of necessity, based on information that could reasonably have been sourced within the time period allocated to the assessment, and is, furthermore, of necessity, dependent on information provided by management and/or its representatives. It should, accordingly, not be assumed that all possible and applicable findings, observations and/or measures are included in this report as this report represents a sample of assessable parameters. As a subsequent event, should additional information become available, Greenmined reserves the right to amend its findings, observations, measures and executive summary.



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC30/5/1/3/2/11136MP**

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2. ENVIRONMENTAL AUDIT REPORT

PROJECT DETAIL

Permit Number	NC30/5/1/3/2/11136MP	Date of Commencement	Not yet commenced
Site name	Spodumene Kop Permit	Inspection Date	24 March 2026
Permit Holder	Spodumene Kop (SA) Ltd	Other Authorisations	N/A
Report Number	01		

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: 24 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:

- Permit 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)):

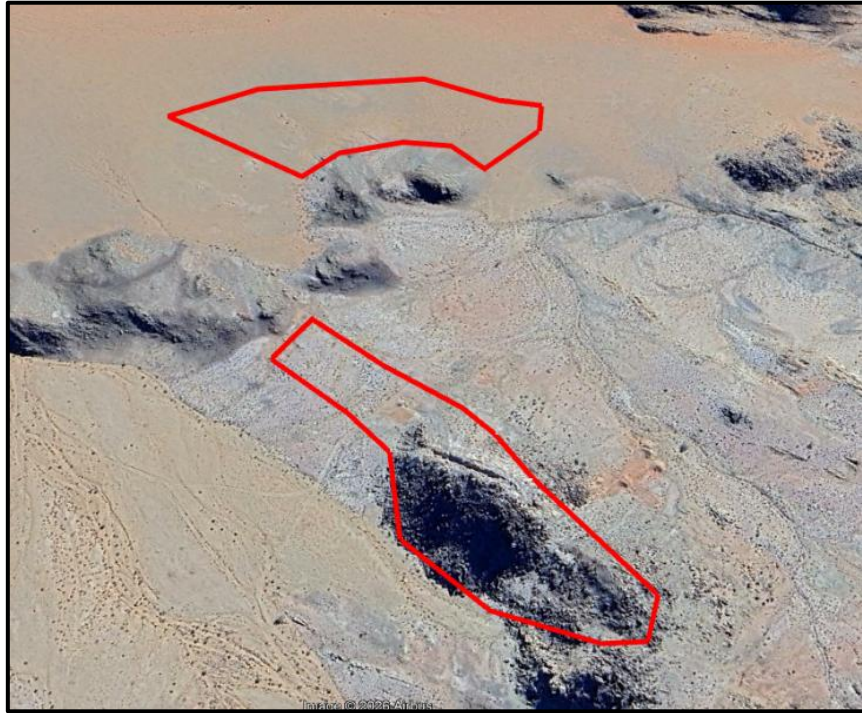
The assumptions contained in this report are based on information gathered during the site audit as well as background details provided by site management. At the time of the inspection, mining activities had temporarily ceased, and the site was non-operational. In addition, most site-related documents 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 mining permit, extends 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°57'38.35"S	18° 2'51.05"E	-28.960652°	18.047514°
b	28°57'39.84"S	18° 2'52.93"E	-28.961067°	18.048035°
c	28°57'41.17"S	18° 2'54.90"E	-28.961437°	18.048583°
d	28°57'42.00"S	18° 2'55.63"E	-28.961667°	18.048787°
e	28°57'43.35"S	18° 2'56.30"E	-28.962043°	18.048971°
f	28°57'46.12"S	18° 2'58.88"E	-28.962812°	18.049690°
g	28°57'47.12"S	18° 2'58.50"E	-28.963088°	18.049583°
h	28°57'47.26"S	18° 2'57.47"E	-28.963129°	18.049297°
j	28°57'46.26"S	18° 2'55.22"E	-28.962851°	18.048673°
k	28°57'44.56"S	18° 2'53.28"E	-28.962378°	18.048132°
l	28°57'42.39"S	18° 2'53.07"E	-28.961776°	18.048074°
m	28°57'41.18"S	18° 2'52.01"E	-28.961439°	18.047781°
n	28°57'39.57"S	18° 2'50.02"E	-28.960991°	18.047228°
p	28°57'28.44"S	18° 2'54.37"E	-28.957900°	18.048437°
q	28°57'29.51"S	18° 2'56.74"E	-28.958196°	18.049094°
r	28°57'29.77"S	18° 2'58.08"E	-28.958269°	18.049466°
s	28°57'30.94"S	18° 2'57.89"E	-28.958594°	18.049413°
t	28°57'32.63"S	18° 2'56.06"E	-28.959065°	18.048905°
u	28°57'31.63"	18° 2'55.10"E	-28.958787°	18.048640°
v	28°57'31.51"S	18° 2'53.63"E	-28.958754°	18.048230°
w	28°57'32.11"S	18° 2'51.67"E	-28.958919°	18.047685°
x	28°57'33.11"S	18° 2'50.57"E	-28.959198°	18.047381°
y	28°57'30.08"S	18° 2'46.18"E	-28.958356°	18.046161°
z	28°57'28.85"S	18° 2'48.99"E	-28.958013°	18.046942°

PROJECT DESCRIPTION

The Applicant, Spodumene Kop (SA) Ltd, holds an environmental authorisation (EA), a mining permit (MP), 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, Tantalum/Niobium Ore, Beryl (Gemstone), Bismuth Ore, Mica and Feldspar.

The proposed mining permit will allow for the extension of existing pit in a pegmatite hill known as Spodumene Kop, as well as in the flats below. In addition to the excavation extension, the project will require the development of:

- Mine residue dump
- Any logistical facilities requires

There will be no processing plant located on this site as all target material will be processed off site.

Assuming that 30% of the material mined is removed from site for processing then the mine residue site must be able to handle 195 000m³ material.

SITE CONDITIONS

Hot sunny weather conditions.

REPORTABLE ENVIRONMENTAL INCIDENTS

Incident Date	Mining activities have not yet commenced.
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
NC30/5/1/3/2/11136MP**

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 13 November 2024.
Copy of the EA and EMPR available on site	N/A	-	-	The documents are available at the Permit Holder's main office, as mining operations have not yet commenced.
Mineral and Petroleum Resources Development Act, 2002 (Act No 28 of 2002)	5	-	Compliant	-
Mining permit available on site	5	-	Compliant	The documents are available at the Permit Holder's main office, as mining operations have not yet commenced.
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)	N/A	-	N/A	
National Water Act, 1998 (Act 36 of 1998)	TBC	TBC	TBC	An application will be lodged for a Water Use Licence (WUL).
Copy of Water Use Authorisation available on site.	TBC	TBC	TBC	-
National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004) (NEM:BA)	5	-	Compliant	The permit area is located within an area mapped as CBA2. CBA1 areas occur approximately 5.7 km west of the development site, representing the Brak river and its buffer, as well as various small patches of ESA1, but which are most likely artefacts of the algorithms used to delineate these areas.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
National Heritage Resources Act. 1999 (Act No 25 of 1999).	N/A	N/A	N/A	The heritage sensitivity of the quarry and surroundings is considered to be low, and therefore there are no objections to proposed mining taking place at Spodumene Kop
DEMARCATON OF SITE (EMPR PG 87)				
Ensure beacons are in place throughout the life of the mine.	TBC	TBC	TBC	The footprint of the mining area must be demarcated prior to commencement. Mining has not yet commenced.
VISUAL CHARACTERISTICS				
Ensure that the site have a neat appearance and is always kept in good condition.	5	-	Compliant	Mining has not yet commenced.
Store mining equipment in a dedicated area when not in use.	5	-	Compliant	Mining has not yet commenced
Vegetation Search and rescue / transplant before excavation advance. Avoid SCC or protected Plant specimens	5	-	Compliant	Mining has not yet commenced
Contain excavations to the approved footprint of the permitted area.	5	-	Compliant	Mining has not yet commenced
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	-	-	Not yet applicable.
The rehabilitation of all areas must take place in such a way that eliminates potential siltation of any stream channel	N/A	-	-	Not yet applicable.
AIR AND NOISE QUALITY				



**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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 not yet commenced
Ensure continuous assessment of all dust suppression equipment to confirm its effectiveness in addressing dust suppression.	N/A	N/A	N/A	
Speed limits must be enforced to reduce erosion. Reduce dust generated by the project activities, especially earth moving machinery, through wetting the soil surface and erecting signs to enforce the speed limit, as well as creating speed bumps enforce slower speeds.	TBC	TBC	TBC	Mining has not yet commenced
Minimise areas devoid of vegetation and only remove vegetation immediately prior to mining.	TBC	TBC	TBC	The permit area is located within an area mapped as CBA2. CBA1 areas occur approximately 5.7 km west of the development site, representing the Brak river and its buffer, as well as various small patches of ESA1, but which are most likely artefacts of the algorithms used to delineate these areas
Minimise fines, blowing from the drop end of the crusher plant by attaching strips of used conveyor belts to the conveyor's end.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Weekly remove compacted dust from the crusher plant to eliminate the dust source.	TBC	TBC	TBC	
Flatten loads to prevent spillage during transportation on public roads.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.



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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Consider weather conditions upon commencement of daily operations. Limit operations during very windy periods to reduce airborne dust and resulting impacts.	TBC	TBC	TBC	
Ensure dust generating activities comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM:AQA, 2004 and ASTM D1739 (SANS 1137:2012).	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Implement best practice measures during the stripping of overburden, excavation, and transporting of material from site to minimize potential dust impacts.	TBC	TBC	TBC	
Ensure that employees and staff conduct themselves in an acceptable manner while on site.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
No loud music may be permitted at the mining area.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
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.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
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.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.

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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Implement best practice measures to minimise potential noise impacts.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
GEOLOGY AND SOIL				
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.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
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.	TBC	TBC	TBC	
Place the soil on a levelled area, within the mining footprint. Do not stockpile soil in undisturbed areas.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
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.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Keep temporary soil stockpiles free of invasive plant species.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Spread the soil evenly over the rehabilitated area upon closure of the site.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Strive to re-instate soil at a time of the year when vegetation cover can be established as quickly as possible afterwards, so that	TBC	TBC	TBC	



**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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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.	TBC	TBC	TBC	
TOPSOIL HANDLING				
Topsoil will be stored in berm above the disturbance area for use in rehabilitation of the disturbed area during closure.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Topsoil berms are to be restricted to 1.5m height and may be as wide as required. The reason for the 1.5m height restriction is to preserve as much of the natural seed bank as viable.	TBC	TBC	TBC	Not applicable, mining has not yet commenced.
Topsoil to be replaced over prepared areas to a minimum of 10cm depth.				Not applicable, mining has not yet commenced
HYDROLOGY (EROSION CONTROL AND STORMWATER MANAGEMENT)				
Limit clearing of vegetation to the proposed mining footprint and associated infrastructure. Ensure no clearing takes place outside the minimum required footprint.	TBC	TBC	TBC	-
Divert stormwater around the soil heaps and mining areas to prevent erosion	TBC	TBC	TBC	Not applicable, mining has not yet commenced



**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Protect stockpiles from erosion and store it on flat areas surrounded by appropriate berms where possible.	TBC	TBC	TBC	Not applicable, mining has not yet commenced
Ensure that adequate slope protection is provided when mining within steep slopes.	TBC	TBC	TBC	Not applicable, mining has not yet commenced
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.	TBC	TBC	TBC	Not applicable, mining has not yet commenced
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.	TBC	TBC	TBC	
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.	TBC	TBC	TBC	
Conduct activity in terms of the Best Practice Guidelines for small-scale mining as developed by DWS.	TBC	TBC	TBC	
Restrict polluting activities including storage of mining fleet, equipment wash down facilities and vehicle maintenance yards to the workshop areas and ensure it	TBC	TBC	TBC	Not applicable, mining has not yet commenced

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
takes place on impermeable hard standing surfaces, which formally drain to a dirty water drainage system at the site.				
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 the fuel and chemicals being stored within the designated storage area.	TBC	TBC	TBC	Not applicable, mining has not yet commenced
In the event of a significant spill or leak of hazardous substances (petrol, diesel, etc.) during the proposed mining activities, such an incident(s) must be reported to the relevant authorities, including the Directorate: Pollution and Chemicals Management, in accordance with section 30 of the NEMA, 1998 pertaining to the control of incidents within 24 hours of such incident. Such incident must also be reported within 24 hours to the Water Authority.	TBC	TBC	TBC	Not applicable, mining has not yet commenced
All watercourses should be considered as no-go areas and afforded a 15m buffer from any permanent land transformation.	TBC	TBC	TBC	Prior to commencement all water courses should be marked as no – go areas. Mining has not yet commenced
The Mining Permit Area must be kept to a minimum and, when near watercourses,	TBC	TBC	TBC	Mining has not yet commenced

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
be demarcated clearly before any activity commences to minimise the impact. This demarcation must be approved by the ECO prior to commencement.				
Remove any accumulated sediment deposited in the Runoff Diversion Channel/Bund due to low gradients and velocities. Carefully check outlets to ensure that these remain free from scour and erosion.	TBC	TBC	TBC	Mining has not yet commenced
Berm Interceptor: Earth dyke barrier constructed of compacted soil to intercept and divert flow of runoff water away from erodible slopes, sensitive areas or water bodies. Placed along contours and/or at toe of slope to divert run-off from sensitive areas. Used to divert water to sediment control structures.	TBC	TBC	TBC	Mining has not yet commenced
TERRESTRIAL BIODIVERSITY, CONSERVATION AREAS AND GROUNDCOVER (VEGETATION MANAGEMENT)				
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.	TBC	TBC	TBC	Mining has not yet commenced
Obtain permits for the removal of protected plant species and keep it on-site in the possession of the flora search and rescue team.	TBC	TBC	TBC	Mining has not yet commenced

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.	TBC	TBC	TBC	Mining has not yet commenced
Adhere to their legal obligations to actively eradicate and manage alien vegetation infestations present on the applicable and surrounding properties	TBC	TBC	TBC	Mining has not yet commenced
No plant species, whether native or exotic, should be brought into, or removed from, the proposed development site, to prevent the spread of exotic or invasive species or the illegal collection of plants.	TBC	TBC	TBC	
The on-site ECO must provide supervision and oversight of vegetation clearing 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.	TBC	TBC	TBC	Mining has not yet commenced
Ensure all vehicles remain on demarcated roads and prevent unnecessary driving in the veld outside these areas.	TBC	TBC	TBC	Mining has not yet commenced
Do not translocate, uproot, or disturb plants for rehabilitation or other purposes	TBC	TBC	TBC	Mining has not yet commenced

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
without express permission from the ECO and without the relevant permits.				
Do not allow fires on-site.	TBC	TBC	TBC	Mining has not yet commenced
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.	TBC	TBC	TBC	Mining has not yet commenced
A professional Search and Rescue service providers be used to remove SCC and/or protected plant species, and the plants used either for later rehabilitation work or other conservation projects. Permits must be kept on-site and in the possession of the flora Search and Rescue team at all times.	TBC	TBC	TBC	Mining has not yet commenced
Blanket clearing of vegetation must be limited to the proposed footprint and associated infrastructure, and only where necessary; no clearing outside of the minimum required areas may take place.	TBC	TBC	TBC	Mining has not yet commenced
Clearing of vegetation should be minimized and avoided where possible.	TBC	TBC	TBC	Mining has not yet commenced
TERRESTRIAL BIODIVERSITY, CONSERVATION AREAS AND GROUNDCOVER (INVADER PLANT MANAGEMENT)				
Implement an invasive plant species management plan to control all invasive	TBC	TBC	TBC	Mining has not yet commenced

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
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DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.				
Do not allow planting or importing of any alien species to the site for landscaping, rehabilitation, or any other purpose.	TBC	TBC	TBC	Mining has not yet commenced
Keep all stockpiles (topsoil & overburden) free of invasive plant species.	TBC	TBC	TBC	Mining has not yet commenced
Control declared invader or exotic species on the rehabilitated areas.	TBC	TBC	TBC	Mining has not yet commenced
FAUNA (FAUNA MANAGEMENT EMPR)				
Ensure no fauna is caught, killed, harmed, sold, or played with.	TBC	TBC	TBC	Mining has not yet commenced
The ECO or other suitably qualified person must remove any fauna directly threatened by the operational activities to a safe location.	TBC	TBC	TBC	Mining has not yet commenced
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.	TBC	TBC	TBC	Mining has not yet commenced
Ensure no snares are set or nests raided for eggs or young.	TBC	TBC	TBC	Mining has not yet commenced

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.	TBC	TBC	TBC	Mining has not yet commenced
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.	TBC	TBC	TBC	Mining has not yet commenced
CULTURAL AND HERITAGE ENVIRONMENT (ARCHAEOLOGICAL, HERITAGE AND PALAEOLOGICAL ASPECTS)				
Confine all mining to the development footprint area.	TBC	TBC	TBC	Demarcations should be set prior to commencement to ensure all activities remaining within the mining footprint. Mining has not yet commenced
Chance Fossil Find Procedure to be adhered to in the case of any fossil finds	TBC	TBC	TBC	To be implemented when mining commences.
Implement a fossil change find procedure when discoveries are made on site.	TBC	TBC	TBC	To be implemented when mining commences.
EXISTING INFRASTRUCTURE (ACCESS ROAD MANAGEMENT)				
When applicable, divert storm water around the access road to prevent erosion.	TBC	-	TBC	To be implemented when mining commences.
Restrict vehicular movement to the existing access road to prevent crisscrossing of tracks through undisturbed areas.	TBC	-	TBC	To be implemented when mining commences.
Repair rutting and erosion of the access road caused as a direct result of the mining activities.	TBC	-	TBC	To be implemented when mining commences.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Prevent the overloading of the trucks and file proof of load weights for auditing by relevant officials.	TBC	-	TBC	To be implemented when mining commences.
Restrict the speed of all mining equipment/vehicles to 40 km/h on the access roads.	TBC	-	TBC	To be implemented when mining commences.
GENERAL (WASTE MANAGEMENT EMPR)				
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 waste handling facility, alternatively arrange collection by a registered hazardous waste handling contractor. File safe disposal certificates for auditing purposes.	TBC	-	TBC	To be implemented when mining commences.
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.	TBC	-	TBC	To be implemented when mining commences.



**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.	TBC	-	TBC	To be implemented when mining commences.
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.	TBC	-	TBC	To be implemented when mining commences.
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.	TBC	-	TBC	To be implemented when mining commences.
Clean spills immediately, within two hours of occurrence, to the satisfaction of the 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.	TBC	-	TBC	To be implemented when mining commences.
Ensure suitable covered receptacles are always available and conveniently placed for the disposal of general waste.	TBC	-	TBC	To be implemented when mining commences.
Store non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., in a container with a closable lid at a	TBC	-	TBC	



**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.				
Handle biodegradables as indicated above.	TBC	-	TBC	
Encourage re-use or recycling of waste products.	TBC	-	TBC	To be implemented when mining commences.
Do not bury or burn waste on the site.	TBC	-	TBC	To be implemented when mining commences.
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 handling contractor. File the safe disposal certificates.	TBC	-	TBC	To be implemented when mining commences.
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.	TBC	-	TBC	To be implemented when mining commences.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Do not discharge water containing waste into the natural environment.	TBC	-	TBC	To be implemented when mining commences.
Implement measures to contain the wastewater and safely dispose thereof.	TBC	-	TBC	
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.	TBC	-	TBC	To be implemented when mining commences.
Implement the use of waste registers to keep record of the waste generated and removed from the mining area.	TBC	-	TBC	To be implemented when mining commences.
GENERAL (STORAGE/HANDLING OF HAZARDOUS SUBSTANCES/CHEMICALS)				
Place chemical storage areas on level ground to prevent offsite migration of any spilled product.	TBC	-	TBC	To be implemented when mining commences.
Ensure that the floor of the storage area is impermeable to prevent seepage of spilled products into the ground or ground water.	TBC	-	TBC	To be implemented when mining commences.
Control access to the chemicals/substances and implement a notification system of an appropriate staff member.	TBC	-	TBC	To be implemented when mining commences.
Maintain a Hazardous Substances Register and keep Safety Data Sheets (SDS) current for all chemicals used on site.	TBC	-	TBC	To be implemented when mining commences.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.	TBC	-	TBC	To be implemented when mining commences.
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 rainwater and hand it as contaminated water. Check all valves and outlets to ensure that its intact and closed securely.	TBC	-	TBC	To be implemented when mining commences.
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.	TBC	-	TBC	To be implemented when mining commences.

**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
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.	TBC	-	TBC	To be implemented when mining commences.
GENERAL (HEALTH AND SAFETY ASPECTS EMPR)				
Ensure that workers have access to the correct PPE as required by law.	TBC	-	TBC	To be implemented when mining commences.
Locate sanitary facilities within 100 m from any point of work.	TBC	-	TBC	To be implemented when mining commences.
Manage all operations in compliance with the Mine Health and Safety Act, 1996 (Act No 29 of 1996).	TBC	-	TBC	To be implemented when mining commences.
Plan the type, duration, and timing of blasting with due cognizance of other land users and structures in the vicinity.	TBC	-	TBC	To be implemented when mining commences.
Inform the surrounding land users and communities in writing ahead of any blasting event.	TBC	-	TBC	
Monitor the compliance of ground vibration and air blast levels to USBM standards with each blasting event.	TBC	-	TBC	
Record all blasts with a vibro recorder.	TBC	-	TBC	
Give audible warning of a pending blast at least 3 minutes in advance of the blast.	TBC	-	TBC	



**ENVIRONMENTAL PERFORMANCE ASSESSMENT SPODUMENE KOP PERMIT
NC30/5/1/3/2/11136MP**

DESCRIPTION	COMPLIANCE SCORE	NON-COMPLIANCE SCORE	STATUS	COMMENTS
Limit fly rock and collect and remove flyrock and rock spill that falls beyond the working area.	TBC	-	TBC	



**ENVIRONMENTAL PERFORMANCE ASSESSMENT STEINKOPF MINNING PERMIT
NC 30/5/1/3/2/11136 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. No mining has yet commenced.

AUDITING OF EA, EMPr AND REPORTING THEREOF

(REGULATION 34):

Date of previous EAR/EPA:	This is the 1 st EPA Report.
Proof of submission to DMPR available:	This is the 1 st EPA Report – March 2026.
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

The compliance of the mining site with the approved EMPr was reviewed during the site assessment. The mining area achieved a compliance score of 100% for the audit period, based solely on the legislative compliance section. Mining activities have not yet commenced; therefore, the remaining sections of the EMPr will be assessed once activities have been implemented.

The Mining permit was obtained on 14 February 2025. Environmental Authorisation was obtained on 13 November 2024.

The enactment letter will be submitted at least two weeks prior to the commencement of mining activities.

The proposed mining permit will allow for the extension of existing pit in a pegmatite hill known as Spodumene Kop, as well as in the flats below. In addition to the excavation extension, the project will require the development of:

- Mine residue dump
- Any logistical facilities require

Third-Party Mining Activities within the Mining Permit Area.

During the audit period, mining-related activities were observed within portions of the mining permit area. It is important to note that these activities were not undertaken by the permit holder.

Upon identification of these activities, the permit holder took immediate action to halt the operations and subsequently lodged formal complaints with the South African Police Service (SAPS) and the Department of Mineral and Petroleum Resources (DMPR).

At the time of identification, the activities were considered to be illegal. The matter is currently under investigation by the relevant authorities to determine the extent and legitimacy of these activities. As these activities fall outside the control and responsibility of the Permit Holder, and are associated with separately authorised mining permits, the affected areas have not been included in the financial provision quantum for this mining permit.

Hazardous Substances and Waste Handling:

Mining has not yet commenced; therefore, it is confirmed that 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 implement the use of waste registers upon commencement.

Heritage Resources:

a Chance Fossil Find Procedure to be adhered to in the case of any fossil finds

Stormwater Management:

All watercourses should be considered as no-go areas and afforded a 15m buffer from any permanent land transformation.

The Mining Permit Area must be kept to a minimum and, when near watercourses, be demarcated clearly before any activity commences to minimise the impact. This demarcation must be approved by the ECO prior to commencement. Site supervisors must ensure that impacts are confined to the mining area. Staff environmental induction must take place prior to commencing and any subcontractors utilised must be inducted before starting work onsite.

Runoff diversion channel: To either protect work areas from upslope runoff (clean water diversion), or to divert sediment laden water to an appropriate sediment retention structure. Inspect after every rainfall and during periods of prolonged rainfall for scour and areas where they may breach. Remove any accumulated sediment deposited in the Runoff Diversion Channel/Bund due to low gradients and velocities. Carefully check outlets to ensure that these remain free from scour and erosion.

Berm Interceptor: Earth dyke barrier constructed of compacted soil to intercept and divert flow of runoff water away from erodible slopes, sensitive areas or water bodies. Placed along contours and/or at toe of slope to divert run-off from sensitive areas. Used to divert water to sediment control structures.

The stormwater management infrastructure must be located outside of the watercourses and designed to ensure the runoff from the disturbed area is not highly concentrated before exiting the mining area and entering the floodplain.

Importantly, wastewater or fine residue tailings from the processing facility at Norra-bees must not enter any watercourses. Prevent any potential sources of pollution from entering the surrounding environment (e.g. litter, hydrocarbons from vehicles & machinery, etc.) and any solid domestic waste must be removed and disposed of offsite. Vehicles must be maintained to prevent leaks. Chemical toilets must not be placed within the drainage areas and should be secured against high winds. These mitigation measures are included within the EMP.

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	-	2026 Document present at Permit Holder's office
• Environmental Assessment Report	-	2026 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:

- Enactment letter to be sent prior to commencement
- Demarcation of mining permit area
- All watercourses should be marked as no-go areas and afforded a 15m buffer from any permanent land transformation.
- Site file to be done prior to commencement

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

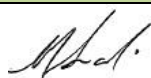
It is believed that the EMPR adequately manage and/or mitigate environmental impacts at the mining area, and no need was identified to amend the EMPR.

FINANCIAL PROVISION:

This report is accompanied by a reassessment of the financial provision calculation for the year 2026 that amounts to R 189 928,35.

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

ECO SIGNATURE

NAME	SIGNATURE	DATE
Murchellin Saal		26 March 2026

PHOTOGRAPHS

MINE AREA



ILLEGAL MINING ACTIVITIES - REPORTED.

MINE AREA



END OF REPORT