

NAMDEB DIAMOND CORPORATION (PROPRIETARY) LIMITED

ENVIRONMENTAL REQUIREMENTS FOR SUPPLIERS, CONTRACTORS AND PARTNERS

CC3 REVISION 8

NAMDEB DIAMOND CORPORATION (PROPRIETARY) LIMITED

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1. ENVIRONMENTAL POLICY STATEMENT

Namdeb Diamond Corporation (Pty) Ltd (Namdeb) is a wholly owned subsidiary of Namdeb Holdings (Pty) Ltd. Namdeb operates an alluvial diamond mining operation on the southwestern coast of Namibia and is jointly owned by the Government of the Republic of Namibia and De Beers. Operations consist of prospecting, large scale placer mining and small-scale mining by independent operators within the Holding Company's Mining License and Exclusive Prospecting License areas.

General Statement

Namdeb is a professional and environmentally conscious organisation which acknowledges the impact that our operations may potentially have on the natural environment.

Aims and Objectives

Namdeb fully commits to:

- protect the environment including pollution prevention and conservation of natural habitats, flora and fauna and cultural heritage;
- determine and evaluate fulfilment of the compliance obligations;
- execute rehabilitation programs during mining operations and make provision for mine closure;
- where practicable, restore habitat impacted by mining to an end state determined through the trajectory approach;
- avoid, substitute or reduce fresh water consumption and reduce our carbon footprint with the aim to become carbon neutral by 2030;
- continually improve the effective implementation of the environmental management system and enhance environmental performance;
- incorporating the principles of the Building Forever initiative including to determine and deliver net positive impact and have no net loss of significant biodiversity;
- complete internal audits and effectively implement critical controls for nonconformities identified;
- effectively and expediently report incidents, complete investigations and implement controls;
- support environmental research and sustainable development initiatives including integrating principles of circular economy, in particular waste management practices that enable zero waste to the landfill and avoid impact on the environment;
- create environmental awareness amongst our employees, suppliers, contractors and partners;
- include the consideration of environmental issues in all business strategies and initiatives;
- assess and, where practicable, reduce the environmental impact of the company's activities, products and services;
- incorporate life-cycle considerations for significant procured goods and services and control and influence our suppliers and contractors;
- consult and engage with interested parties on critical environmental matters of mutual concern;
- make available suitable and adequate resources to achieve our environmental objectives;
- demonstrate and report on environmental performance and provide assurance to shareholders.

2. SCOPE OF THIS DOCUMENT

This document sets out the basic environmental management requirements to be adhered to during the construction, commissioning, operational and closure phases of projects, and shall be complied with by all persons and suppliers, contractors and partners performing site works within Namdeb's Mining Licenses or Exclusive Prospecting License areas including the town of Oranjemund and Windhoek. It is important to note that specific suppliers, contractors and partners may require further detailed environmental programmes, based on comprehensive Environmental Impact Assessments, depending on the scope and nature of the work to be performed. It is the suppliers, contractors and partners responsibility to ensure that controls are implemented and tangible progress demonstrated.

3. RESPONSIBILITIES

3.1. The Namdeb Contracts Manager shall:

- a) Ensure that environmental requirements are included in all contracts, Enquiry Documents and Required Operational Capability documents.
- b) Ensure that environmental requirements of the project are budgeted for.
- c) Maintain liaison with the Namdeb Environmental Section on matters concerning the environment.
- d) Ensure all contractors, suppliers and partners have access to the Namdeb Minewide communications and environmental incidents reported by contractors, suppliers and partners are captured onto the Isometrix system.
- e) Ensure required waste management skips/bins are on site during the site mobilization phase.
- f) Brief the contractor, supplier or partner on the CC3 requirements prior to the commencement of the activities.

3.2. The Namdeb Line Manager/Supervisor/Foreman shall:

- a) Promote environmental awareness on the site.
- b) Maintain liaison with the Namdeb Environmental Section on matters concerning the environment.
- c) Ensure that the Environmental Programme for the area is followed, actioned and records of progress is kept.
- d) Ensure that environmental requirements are included in the working cost budget where relevant.
- e) Report and investigate root causes of environmental incidents and ensure corrective action is taken and documented.

3.3. The Suppliers, Contractors and Partners will:

- a) Retain accountability of effective environmental performance within their site of operation and general sphere of influence.
- b) Follow the Namdeb objectives and indicators to demonstrate environmental performance.
- c) Ensure that all employees attend an environmental induction before starting work and that they be present at regular environmental training sessions, and SHE talks.

- d) Adhere to all relevant national and international environmental legislation, company policies and procedures, any requirements specified in the environmental management programme for the area and any requirements specified in the contract.
- e) Inform him/herself and the personnel of the site environmental requirements in the SHE files and ensure that they are adhered to.
- f) Ensure that all environmental incidents are reported as per PR-EV-20.
- g) Communicate monthly environmental topics and content of the on-site SHE files to all their employees.
- h) Regularly review and maintain SHE files.
- i) Take no actions that will harm or may cause harm to the environment and will take steps to prevent pollution on the work site.
- j) Confine its activities to the work site and drive only on established roads and tracks.
- k) Consider the life-cycle approach of their processes, products and services rendered to Namdeb and where practicable put in place controls to mitigate significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.

4. NAMDEB'S LEGAL AND OTHER REQUIREMENTS

The suppliers, contractors and partners are responsible for compliance to all compliance obligations (including legal and other requirements) to which Namdeb subscribes to. A comprehensive list of the aforementioned is accessible and obtainable from Namdeb's Environmental Section.

The following environmental policies and procedures should be adhered to.

CONTEXT OF THE ORGANISATION (4.0)	
4.1 Understanding the organisation and its context and 4.2 Understanding the needs and expectations of I&APs	PO-EV-09 Context of the organization
4.3 Determining the scope of the EMS	PO-EV-09 Context of the organization
4.4 EMS	PO-EV-27 Environmental Policy Manual
LEADERSHIP (5.0)	
5.1 Leadership and commitment	PO-EV-27 Leadership and Commitment
5.2 Environmental Policy	PO-EV-05 Environmental Policy
5.3 Organizational roles, responsibility, and authorities	PR-EV-14 Organizational roles, responsibility, and authorities
PLANNING (6.0)	
6.1.1 Planning Action to address risks and opportunities: General	PO-EV-09 - Context of the organization
6.1.2 Environmental aspects	PR-EV-10 Environmental Aspects
6.1.3 Compliance obligations	PR-EV-11 Compliance Obligations and evaluation of compliance

6.1.4 Planning action	PR-EV-12 Environmental Objectives and Planning Action
6.2.1 Environmental objectives	PR-EV-12 Environmental Objectives and Planning Action
6.2.2 Planning actions to achieve EMS objectives	PR-EV-12 Environmental Objectives and Planning Action
SUPPORT (7.0)	
7.1 Resources	PR-EV-14 Organizational roles, responsibility and authorities
7.2 Competence	PR-EV-15 Resources, Competence Training and Awareness
7.3 Awareness	PR-EV-15 Resources, Competence Training and Awareness
7.4 Communication	PR-EV-16 Communication
7.5 Documented information	PR-EV-17 Creating, updating and control of documented information
OPERATION (8.0)	
8.1 Operational planning and control	PR-EV-13 Operational planning and control
8.2 Emergency preparedness and response	PR-EV-18 Emergency preparedness and response
PERFORMANCE EVALUATION (9.0)	
9.1.1 Performance evaluation: General	PR-EV-19 Monitoring, measurement, analysis and evaluation
9.1.2 Evaluation of compliance	PR-EV-19 Monitoring, measurement, analysis and evaluation
9.2 Internal audit	PR-EV-22 Internal Audit
9.3 Management review	PR-EV-23 Management Review
IMPROVEMENT (10.0)	
10.1 Improvement: General	PR-EV-20 Non-conformity, corrective action and continual improvement
10.2 Non-conformity and corrective action	PR-EV-20 Non-conformity, corrective action and continual improvement
10.3 Continual Improvement	PR-EV-20 Non-conformity, corrective action and continual improvement
OTHER ENVIRONMENTAL POLICIES AND PROCEDURES	
PO-EV-01	Protection of archaeological, historical and paleontological remains
PR-EV-02	Application to conduct scientific research in Diamond Area N° 1
PO-EV-03	Hunting /Possession & handling of game products in Diamond Area N° 1
PO-EV-04	Protection of land, aquatic and marine flora and fauna
PO-EV-06 and PR-EV-06	Namdeb Environmental Fund

PO-EV-07 and PR-EV-07	Pollution Prevention and Remediation
PO-EV-08	Rehabilitation policy
PO-EV-21	Protection of the environmental during road building activities
PR-EV-24	EIA Process
PR-EV-25	Chance Find Procedure
WASTE MANAGEMENT POLICIES AND PROCEDURES	
PO-WM-01	Waste Management Policy
PR-WM-01	General Waste Removal Procedure
PR-WM-02	Hazardous Waste Classification, Handling and Transportation Procedure
PR-WM-03	Procedure for Handling and Disposal of Fluorescent Tubes
PR-WM-04	Procedure and Guidelines for the Handling of Paint and Protective Coating Waste
PR-WM-05	Waste Oil Management
PR-WM-06	Procedure for Handling and Disposal of Batteries
PR-WM-07	Procedure for Access to Waste Site (SCRAP YARD)
PR-WM-08	Procedure to Operate a Landfill Site
PR-WM-09	Procedure for the Temporary Safe Storage of Hazardous Waste
PR-WM-11	Procedure for the Operation of a Bioremediation Site
OTHER POLICIES AND PROCEDURES	
PO-ST-01 and PO-ST-02	Procurement Policy and Procedure
PO-ST-06	Obsolete Stock
PO-ST-07 and PR-ST-07	Disposal and Salvage of Company Property
PO-ST-09	Control of Hazardous Substances
PR-ST-11	Addition, Deletion and Amendments to Namdeb's Standard Stock Take Items
PR-ST-12	Standards Committee
PR-ST-13	Provision for Obsolete Stock
PO-HOFIN-08 and PR-HOFIN-08	Risk Management
PR-EN-00	Draft Management of Change Procedure
PR-MI-16	Consideration for earthworks, Planning, Control and Execution
PO-LC-01 and PR-LC-01	Namdeb Disaster Plan
PO-LC-02 and PR-LC-02	Accident and Incident reporting and investigation
PO-LC-11 and PR-LC-11	Asbestos Procedure and Handling Transportation and Disposal of Asbestos Containing Waste

5. ENVIRONMENTAL AUDITS

- 5.1. The Environmental Section, according to a set audit programme, will undertake internal environmental system and compliance audits. Ad hoc site inspections by the Environmental Section may be undertaken without prior notice. The suppliers, contractors and partners should also observe all environmental requirements of the SHE Audit Sheet for Inspections (or commonly known as the 5.40 inspection sheet).
- 5.2. External environmental audits will be undertaken by auditors contracted by Namdeb, and may involve inspections of suppliers, contractors, and partners sites.
- 5.3. Suppliers, contractors, and partners are encouraged to conduct regular on-site inspections to identify and address early enough any deviations from Namdeb's environmental requirements including policies and procedures.

6. ENVIRONMENTAL AWARENESS

- 6.1. The suppliers, contractors and partners shall ensure that each individual has an environmental training plan and that progress on this plan should be regularly assessed.
- 6.2. The suppliers, contractors and partners shall familiarise him/herself and personnel of the Namdeb environmental requirements relevant to his operations.
- 6.3. Environmental issues shall be included as an agenda item on the SHE meeting agenda.
- 6.4. The suppliers, contractors and partners will take no actions that will harm or may cause harm to the environment and will take steps to prevent pollution on the work site.
- 6.5. The suppliers, contractors and partners shall confine its activities to the work site.

7. ENVIRONMENTAL MANAGEMENT SYSTEM

Namdeb has implemented an Environmental Management System compliant with the international standard ISO 14001. Environmental Programmes have been set up for specified areas for which a Namdeb appointed area manager shall be accountable. Suppliers, contractors, and partners activities will be included in the Environmental Programme of the operational area, and the suppliers, contractors, and partners shall take responsibility to adhere to the requirements of the relevant environmental programme.

8. NATURAL RESOURCE MANAGEMENT

- 8.1. The suppliers, contractors and partners shall take steps to ensure that there is no unnecessary wastage of water, or excessive use of electricity or petroleum products.
- 8.2. The suppliers, contractors and partners shall take steps to treat Indirect Green House Gas Emissions (Scope 3). *Scope 3 emissions are a consequence of the activities of a company but occur from sources not owned or controlled by the company. These emissions originate from value chain emissions, including the product supply chain and product lifecycle operations. An example of this is when we buy, use and dispose of products from suppliers.*
- 8.3. The suppliers, contractors and partners shall ensure that no contaminants or pollution enter ground, river, or marine water.

- 8.4. The suppliers, contractors and partners shall keep a record of resources used including water, fuel, lubricants, electricity, and Ferrosilicon.
- 8.5. The suppliers, contractors and partners shall ensure that spillages (e.g. fuel, lubricants, paints, chemicals) are contained and that there is a plan in place to deal with accidental spillages.
- 8.6. Only temporary ablution facilities compliant with the requirements of the effluent disposal permit for that area may be used on site.

9. WASTE MANAGEMENT

- 9.1. The suppliers, contractors and partners shall ensure that the disposal of all waste generated is in accordance with the Namdeb Waste Management policies and procedures, or to the specific requirements of that area of operation.
- 9.2. Waste may only be disposed of at designated disposal sites.
- 9.3. All waste must be separated at source (point of generation) and disposed of in the appropriate colour coded or labelled bin/skip or location prior to collection and final disposal as per PR-WM-01.
- 9.4. Skips/containers will remain the responsibility of each supplier, contractor and partner area/workshop for, i.e. providing, maintenance, colour code, labelling, replacement, budgeting, etc as per PR-WM-01 section 6.
- 9.5. The suppliers, contractors and partners shall maintain good housekeeping policies to ensure that there is proper refuse collection and no accumulation of waste within the site area. PR-WM-01
- 9.6. Waste oil must be disposed of into a tank in accordance with the procedure of that area of operation and the Waste Oil Management Procedure (PR-WM-05) should be applied.
- 9.7. Temporary dumping of waste anywhere on site will not be permitted unless authorised by the Environmental Section. An express condition of this authorisation will be that the suppliers, contractors and partners undertakes to permanently dispose of the waste at the earliest opportunity.
- 9.8. The contractor is encouraged to implement any opportunity that supports the principles of a circular economy through sharing, leasing, reusing, repairing, refurbishing and recycling existing waste and or new materials and products for as long as possible.
- 9.9. No waste may be burned on site unless authorised by the Environmental Section.

10. POLLUTION PREVENTION AND REMEDIATION

- 10.1. The suppliers, contractors and partners shall ensure that all fuel, lubricants, and chemicals are stored in a bunded, well-ventilated area and as specified in the material data sheets (MSDS).
- 10.2. Fuel, lubricants, and chemicals must be transferred, used and disposed of in such a manner to prevent environmental pollution.
- 10.3. An approved oil absorbent (e.g. Peatsorb) must be available on site at all times for the clean-up of spills.
- 10.4. The suppliers, contractors and partners shall ensure that any spill caused by him/herself or personnel, or which occurs because of activities on the site, is cleaned up and any polluted soil remediated.

- 10.5. Clean-ups and remediation must be undertaken to the satisfaction of the Environmental Section, and inspections will be undertaken in this regard.
- 10.6. Where clean up and remediation is not completed satisfactorily, Namdeb reserves the right to undertake the clean-up or remediation at the suppliers, contractors and partner's expense.
- 10.7. Non-compliance with permit conditions/town bylaws and all fuel, oil, and lubricant spills of more than 200 litres shall be reported to the relevant authorities in the prescribed format immediately. These incidents should be reported immediately to the safety or environmental representative on site who will record and inform the Environmental Section.

11. STORAGE, DISPOSAL AND HANDLING OF HAZARDOUS MATERIALS

- 11.1. Before procurement of any substance that is not procured through Namdeb's stores department (not a stock item), the suppliers, contractors and partners shall liaise with the Environmental Section to verify and endorse usage of such substance.
- 11.2. The suppliers, contractors and partners shall identify and maintain a register of all hazardous materials. These shall be stored, used and disposed of in a form and manner prescribed in the Material Safety Data Sheets (hereinafter referred to as MSDS). The suppliers, contractors and partners must familiarize themselves with all waste management procedures as stated in the table above.
- 11.3. All hazardous substances on site must be marked and accompanied by the appropriate MSDS. The MSDS must include detailed environmental information.
- 11.4. All hazardous materials must be stored in a contained, well-ventilated area to ensure that the potential for pollution during storage and transfer is minimised and that poisonous gases/vapours do not concentrate to cause harm to employees or the environment.

12. ENVIRONMENTAL INCIDENT REPORTING

Notwithstanding any requirements already contained herein the suppliers, contractors and partners is required to report any environmental incidents to Namdeb through the SHE Department incident reporting incident card system (Isometrix).

An environmental incident is an action that can have an actual or potential negative impact on the environment. The primary purpose of reporting environmental incidents is to initiate the investigation and immediate remediation of conditions, which, if left unchanged, may lead to increased negative environmental impacts, both on the operations as well as off-site from the operations. It is also to inform the level of investigation required to determine how and why controls failed so that they can be improved to prevent repeat incidents from occurring.

Incidents are categorised, based on what element/s of the environment is impacted on. Namdeb has adapted the Anglo-American incident types. These are:

- Air
- Land
- Water
- Biodiversity
- Cultural/Archaeological Sites

- Visual Aesthetics

The following occurrences are classified as environmental incidents:

- Spillage of fuel and lubricants (outdoors and >25 liters indoors).
- Incorrect waste separation and disposal.
- Illegal dumping and littering.
- Wildlife and plant incidents (disturbances, collection, killing/ hunting, illegal fishing).
- Disturbance of historical, paleontological, and archaeological sites.
- Uncontrolled driving off existing tracks and roads.
- Incorrect storage, handling, disposal or release of hazardous substances into the environment (e.g. paint, fluorescent tubes, batteries, radiation sources).
- Incidental disturbance to environmental sensitive and monitoring site.
- Spillage of fine residue (slimes).
- Spillage of effluent (e.g. sewage).
- Incidental emissions to air (e.g. burning of tyres, machinery, etc.).
- Wastage of natural resources (e.g. water, electricity).
- Other environmental incidents (please specify).

As per the nonconformity, corrective actions and continual improvement procedure (PR-EV-20) the following occurrences are classified as reportable environmental incidents (REI) - incidents that are required to be reported the authorities by law:

A. Fuel and lubricant spills of more than 200 litres

The Ministry of Mines and Energy requires Namdeb to report all uncontained major petroleum product (fuel, oil and lubricant) spills of more than 200 litres. A contained spill is defined as having occurred:

- in a bunded area
- in a workshop area
- on a concrete asphalt surface and as being contained before interaction with soil or water.
This means that if there is interaction with soil or water (fuel and lubricant spills more than 200 litres), such incident should be reported as a reportable environmental incident.

B. Spillage of more than 1000 litres of sewage

- Accidental spillage of sewage (of about 1000L and more) is to be reported in accordance with the wastewater and domestic effluent exemption permits issued by the Ministry of Agriculture Water and Forestry.

C. Spillage of more than 100 litres of hydrocarbons in the marine environment

- Guidelines from the Directorate of Maritime Affairs requires hydrocarbon spills into the marine environment of more than one hundred liters (>100L) to be reported as an environmental incident.

D. Seepage from fine residue disposal dams

- Permit conditions from the Department of Water Affairs requires that seepage of fine residue be reported as an environmental incident.

E. Unplanned disturbance to research control points and other designated sensitive areas

- An incident (event) should be logged and investigated for any removal or destruction of control/benchmarking points used for research and monitoring purposes.
- The National Heritage Act of 2004 requires that impacts to archaeological/ paleontological sites be reported to the National Heritage Council. The Namdeb Chance Find Procedure (PR-EV-25) has the same requirement.
- Rehabilitated sites.
- Legally designated conservation areas (e.g. Marine Protected Area, Park, RAMSAR site).

13. SITE CLOSURE AND REHABILITATION

- 13.1. The suppliers, contractors and partners must document the condition of the site prior to establishment of his/her operations.
- 13.2. Where large-scale clearing of vegetation and stripping of soil is required, red listed (protected) plant species and where practicable topsoil must be rescued and stored for later application during rehabilitation.
- 13.3. The suppliers, contractors and partners must ensure that the site is cleaned up at their own expense, and any specified rehabilitation undertaken before leaving the site.
- 13.4. Where applicable, temporary structures are to be demolished, excavations closed, man-made landforms re-shaped and stored topsoil re-applied. Rescued plants where practicable should be re-planted.
- 13.5. All scrap, waste and building rubble must be disposed of to designated sites.
- 13.6. All polluted soil should be remediated, and watercourses restored to the satisfaction of Namdeb's Environmental Section.
- 13.7. The Namdeb site manager and Contracts Manager will ensure an environmental site inspection will be carried out before the site is abandoned to ensure that the area is left in an acceptable condition. This inspection may be conducted with the aid of the Environmental Section. Any additional clean-up required after the suppliers, contractors and partners has left the site will be for the suppliers, contractors and partner's account.

14. GENERAL

- 14.1. Only approved (designated "active") borrow pits may be exploited and the usage shall entail a rehabilitation plan.
- 14.2. The suppliers, contractors and partners should determine its own measurable environmental objectives and indicators to demonstrate tangible environmental performance.
- 14.3. suppliers, contractors, and partners personnel may be housed on site for the duration of the contract. This includes remaining on site after hours when required with approval from the Namdeb site or Contracts Manager and permission being granted by Namdeb Security.
- 14.4. There shall be no disturbance of wildlife, plants, archaeological, historical, or paleontological sites in Namdeb's Licence or Exclusive Prospecting Licence areas.
- 14.5. Emergency preparedness and response plans for the suppliers, contractors and partners activities should be available, where applicable and spill drills and/or simulation be conducted (PR-EV-18).

14.6. Only designated roads and entrances may be used.

15.SPECIFIC SUPPLIERS, CONTRACTORS, AND PARTNERS REQUIREMENTS

- 16.1. These requirements will differ depending on the nature of the project and it will be the responsibility of the Namdeb Contract Manager to ensure these are captured in the specific contract.
- 16.2. Suppliers, contractors and partners should at all times observe any other environmental requirements that Namdeb subscribes to, in particular the De Beers Family of Companies' other requirements and Anglo-American Standard, Technical Specifications and Guidelines.

16.SIGN OFF



Nandehasho Nickanor
Environmental Manager