

NYANZA'S ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM (ESMS)

Date | 10 February 2023

Presented by | Nyanza Management

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Introduction to the Nyanza Project

Nyanza is developing a project to produce 80 000 tons per annum Titanium Dioxide (TiO₂) pigment plant (Main plant) constructed and operated in Richards Bay, KZN South Africa. The 67ha project site is located within the Richards Bay Industrial Development Zone (RBIDZ), which is a state-owned entity founded and financed by the South African government. We are currently concluding a Bankable Feasibility Study and aiming for Financial close by end Q2, 2023, with a target of commencing construction before the end of Q4 2023.

The design of the main plant has taken into account sustainability and circular economy principles, inter alia, to reduce our carbon footprint and use of raw materials.

The Product Testing and Development Centre (PTDC) which opened its doors in June 2022, is aimed at developing Nyanza's pigment recipes for manufacturing in the main plant, and producing lab scale product samples to assist Nyanza in concluding customer offtake agreements for the main plant. This PTDC operation, which is currently only operating the laboratory, has a staff complement of 15 personnel, with the rest of the Nyanza staff compliment stationed at its Head Quarters in Sandton, Johannesburg. The small scale batch plant in the PTDC is fully licensed, with an environmental authorization and an Air Emissions License in place, however it is not yet operational, it is currently being kitted with equipment and is expected to be commissioned in Q2 2024.

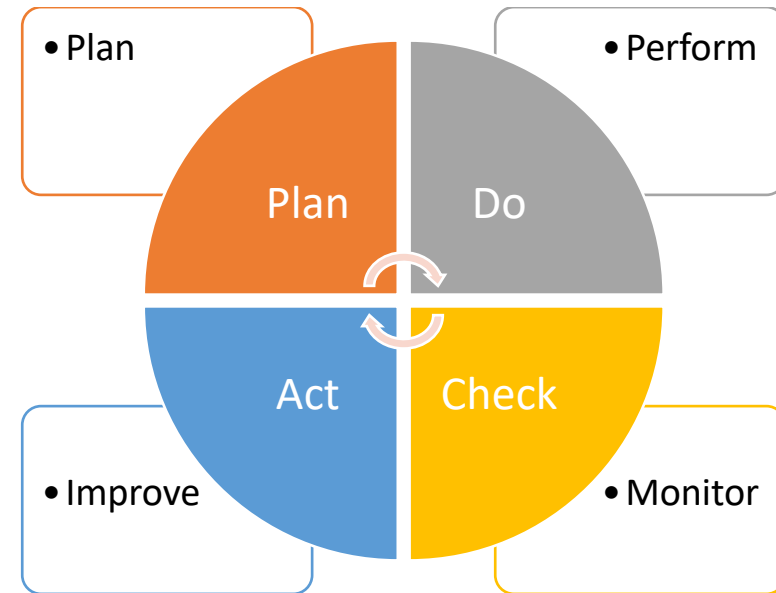
Nyanza's goal is 'to be a diversified TiO₂ pigment and chemicals manufacturing company.



Nyanza has begun developing an Environmental and Social Management System (ESMS) which sets out processes and practices that will assist Nyanza meet its business goals. The approach that Nyanza adopted in developing its ESMS can be broken down as follows:

- *Achieving commitment of senior management to design, develop and implement an ESMS:* The Board of Nyanza as well as Executive and Senior management are committed to the development and implementation of an ESMS, which will be updated and improved upon as the Nyanza project progresses through the various development phases.
- *Identification of an E&S Team:* Even though Nyanza has a small staff compliment currently, there is a team that has been identified to design, develop and champion the implementation of Nyanza's ESMS. This team is led by the General Manager for Sustainability and Corporate Affairs.
- *Identification of E&S Risks and Opportunities and Impacts:* This exercise has been carried out for the PTDC through risk identification procedure and for the main plant as part of the Environmental Impact assessment as well as various HAZID and Hazops studies done.
- *Identification and Establishment of E&S objectives*
- *Development of E&S Policy statement:* Nyanza has an approved E&S policy statement, it is included under Section 1 (i).
- *Creating Policies and Procedures:* A number of E&S policies and procedures have been developed and are under implementation.
- *Determining Roles and Responsibilities:* Each of the procedures developed have specific responsibilities assigned to various personnel or groups of people within Nyanza.

Nyanza's ESMS adopts the Plan-Do-Check-Act cycle.



Nyanza has adopted a systems approach to managing its E&S risks.



Nyanza's ESMS was developed using the 9 key elements in the figure above.

Progress on ESMS Elements: I. Policy

Nyanza has an Environmental & Social Policy which communicates our commitment to managing E&S risks. In addition, the following specific policies and procedures have been developed and are attached:



Human Resource Policy covering:-

- Terms and Conditions of Employment
- Remuneration and Benefits
- Freedom of Association
- Safety and security
- Smoking and substance abuse
- Life threatening and communicable illnesses
- Sexual Harrassment
- Grievance Procedure
- Child and Forced Labour

All the above are covered in the Nyanza Employee Handbook & HR Policy.

E&S Procedures

- Hazard Identification and Risk assessment procedure
- Handling and storage of chemicals procedure
- Incidents, accidents, SHE non conformance and corrective & preventative action procedure
- Resources, Training, competency and awareness procedure
- Compliance & Legal obligations procedure
- Emergency Preparedness and response procedure
- Consultation, Communication and participation procedure
- Monitoring, Measurement, analysis and performance evaluation procedure
- Internal audit procedure

 <small>Nyanza Light Metals World-class TiO₂ pigments</small>	<p>POLICY</p>	<p>No.:NZA-HSE-GEN-002-REV:00 DATE:10/10/2022</p>
<p>SUBJECT:</p>		
<p>ENVIRONMENTAL & SOCIAL POLICY</p>		
<p>NYANZA LIGHT METALS is a manufacturer of Titanium Dioxide Pigment (TiO₂) and other co-products such as Gypsum, Aluminium and Ferrous Sulphate.</p>		
<p>Purpose of this policy</p> <p>To share and communicate our commitment to a workplace free from harm, through the prevention of pollution.</p>		
<p>We are committed to...</p> <ul style="list-style-type: none"> ▪ Complying with applicable Environmental legislative and other requirements to which we subscribed to. ▪ Developing and Maintaining an Environmental and Social Management System (ESMS) that is based on the ISO 14001 and IFC Performance standards and shall conduct regular audits of the Environmental Management System to ensure its adequacy and effectiveness. ▪ Establishing clear Environmental & Social performance objectives that include both leading and lagging indicators. ▪ Continually monitoring and measuring our Environmental & Social performance, against set objectives, identifying and reporting on impacts and opportunities for continual improvement. ▪ Implementing effective processes for workforce consultation and engagement at all appropriate levels on Environmental and Social issues. ▪ Identifying and controlling the Environmental & Social impacts of operational activities. ▪ Providing an effective engagement platform for interested and affected parties which include internal and external stakeholders. 		
 _____ Donovan Chimhandamba CEO		10/10/2022 _____ Date
<p>Confidential and for internal use only - Nyanza Light Metals (Pty) Ltd</p>		

II. Identification of Risks and Impacts

We have developed a Hazard Identification and Risk Assessment Procedure. The purpose of this procedure is to assist us in identifying Environmental and Social risks in order for us to develop the correct strategies to manage these risks.

Using this hazard identification and risk assessment procedure, we have identified a number of hazards and assessed our risks in the current operations of the PTDC. Whilst the procedure exists, the risk register will be updated as the risk profile of the operations will change when the operations of the PTDC expand to include ocommissioning of the demonstration scale plant (in April 2024).

Furthermore, the HAZID studies and environmental impact assessment process have also identified hazards and potential negative risks for the main plant respectively. Once the final designs for the main plant are available, further hazard identification and risk assessment will be done through further Hazop studies.


In general, the risks identified span across the following:

- Environmental risks
- Occupational Health and Safety risks
- Labour and community risks* (*these risks are identified and managed by a special technical sub-committee endorsed by the Board, the Stakeholder Engagment Committee, with specialist external expertise on stakeholder relations*)


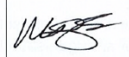
The full Hazard identification and risk assessment procedure as well as the Baseline Risk Assessment done for current operations, are both available on request.

The HAZID 1 & 2 studies as well as a fire risk study conducted or the main plant are also available on the link.

The Environmental Impact Report and Environmental Management Programme, detailing E&S risks for the main Plant as well as mitigation measures are also publicly available.

 Nyanza Light Metals <small>World class. Truly pigments</small>	<u>STANDARD PROCEDURE</u>	No:NZA-HSE-SP-002-REV:00 DATE:03/06/2022
	SUBJECT: HAZARD IDENTIFICATION & RISK ASSESSMENT PROCEDURE	


1. PURPOSE
2. SCOPE
3. DEFINITIONS AND ACRONYMS
4. RESPONSIBILITIES
5. NINE STEPS OF RISK ASSESSMENT PROCESS FLOW
6. TYPES OF RISK ASSESSMENT
7. SHE RISK RANKINGS PER CATERGORY
8. SHE RISK MATRIX
9. REQUIREMENTS FOR RISK AND IMPACT ASSESSMENT TO BE REVIEWED
10. SHE RISK SUMMARY
11. SHE RISK AND ASPECT CRITERIA
12. CONTROL LEVEL EVALUATION AND SELECTION
13. REFERENCES

	NAME	DESIGNATION	SIGNATURE	DATE
ORIGINATOR	Thulani Dlamini	Safety Advisor		28/06/2022
REVIEWED AND APPROVED BY:	Mosima Kgaswane	Site Manager		28/06/2022

III. Management Programs...

There are a number of action plans and procedures under development to mitigate the risks associated with our operations. The action plans still need to be streamlined and properly aligned to the risk matrix. Furthermore, the mitigation hierarchy (Avoid, minimize, offset/compensate) needs to be applied as a management strategy across the risks. Our goal is to fully develop these plans, add timeframes to them and start verifying progress against targets and objectives. We should then be able to track improvements in terms of our E&S performance and capture all these in annual improvement plans which are consulted with employees, managers as well as external stakeholders where appropriate. The following are examples of some of the action plans that are in place and are under implementation:

- SHE Risks: We have set targets and objectives for risks identified. The draft action plan below is in development and includes tasks as well as resources needed and completion dates for the actions. The full document is available on the link. Furthermore, our priority risk at the PTDC currently relates to the management of hazardous chemicals. Owing to this, we have developed a specific procedure to handle and store these chemicals. The procedure is included on the link.

 Nyanza Light Metals <small>World-class TiO₂ pigments</small>		<u>OBJECTIVES AND TARGETS PROGRAM</u>			No:NZA-HSE-GEN-025-REV:00 DATE:09/01/2023	
SUBJECT:		SAFETY, HEALTH AND ENVIRONMENTAL OBJECTIVES AND TARGETS PROGRAM FOR 2023				
OBJECTIVES	TARGETS	BY WHEN	WHO	TASKS	RESOURCES NEEDED	COMPLETION DATE/NOTE
Compliance with applicable legislative requirements.	Zero (0) notice from authorities	During 2023	T.Dlamini	<ul style="list-style-type: none"> • Conducting legal compliance SHE audits. 	<ul style="list-style-type: none"> • Legal consultant auditor. 	10 June 2023
No Fatal Injury.	Zero (0) Fatal Injury	End of 2023	Site Management	<ul style="list-style-type: none"> • Conduct a 60-second check. • Conduct a risk assessment for every activity performed onsite. • Conduct equipment inspections. • Conduct morning meetings. • Discuss safety share every day in the morning. • Ensure that employees are 	<ul style="list-style-type: none"> • SHEQ staff 	As and when required

III. Management Programs...

- Environmental Risks: An Environmental management Programme is in place and under implementation for the PTDC operations. This programme formed part of the Environmental Authorisation obtained for the PTDC (Full programme is attached on the link).
- Community & Labour Risks: The Stakeholder Engagement Committee is implementing a workplan aimed at mitigating priority community and labour risks. Furthermore, Nyanza has an internal Grievance procedure for employees (to express their complaints, as a way to minimize discrimination and other labour disputes. In addition to this, and for external stakeholders there is a complaints register that Nyanza maintains to track and resolve external complaints.



Environmental Management Programme Report

Action Plan for community and labour risks

No	Strategic Intent	Strategic Actions
1	Systematically address and coordinate Community and BB-BEE matters affecting Nyanza	Appoint Stakeholder Engagement Committee supported on the ground by a Co-ordinator for day to day operations
2	Strengthen RBIDZ acceptance in communities	Establish RBIDZ-Nyanza forum
3	Institute transparent procurement processes	Review Nyanza Procurement Plan and establish set asides for local procurement
4	Provide a safe and secure workplace for Nyanza employees	Targeted engagement of suitable security services
5	Manage Stakeholder Expectations	Mapping of stakeholders with RBIDZ and development of engagement strategies
6	Establish Community participation Model	Set up Community Benefit Trust

IV. Organizational Capacity and Competency

Nyanza ESMS Team
 ESMS Team Leader: General Manager Sustainability & Corporate Affairs (N Tetyana)

	Environmental Health & Safety	<ul style="list-style-type: none"> •Senior Sustainability Officer (Thulani Dlamini) 	<ul style="list-style-type: none"> • SHE procedures • Training & Awareness • Emergency Preparedness Response
	Production	<ul style="list-style-type: none"> •Production Manager (M Mahaye) •Production Team Leader (N Ndlovu) •Junior Engineer (Vuyi Ntaka) 	<ul style="list-style-type: none"> • Resource Efficiency & Reduction of Carbon footprint • Equipment and Machinery efficiency & Maintenance • Waste Minimisation & Circular Economy
	Procurement & Logistics	<ul style="list-style-type: none"> •Supply Chain & Logistics Officer (Derrick Chimhandamba) 	<ul style="list-style-type: none"> • Supplier & contractor qualification • Supplier & Contractor E&S performance
	Human Resources	<ul style="list-style-type: none"> •Human Resources Officer (Lisa Naidoo) 	<ul style="list-style-type: none"> • Management of employee training needs and preparation of training plans • Employee conditions of employment • Employee Induction into ESMS

As indicated, the Executive and Senior Management of Nyanza is committed to the implementation of our ESMS. The General Manager: Sustainability and Corporate Affairs leads the ESMS team. The balance of the team is made up of: Senior Sustainability Officer, HR Officer, Plant managers and Production Team leaders, Junior Engineer as well as Supply Chain & Logistics Officer. The roles of the various personnel / portfolios are clear in respect of E&S.


There are also legal appointments that are required in terms of Occupational Health and Safety legislation (appointment letters on the link). The task that we must undertake is to capacitate this team with training over and above the basic on the job and safety training received. As the Nyanza project progresses this team must be enhanced and its capacity boosted to match the complexity of project activities and scale as well as to assist the team understand the impact of the ESMS on business strategic goals.

IV. Organizational Capacity and Competency...

Nyanza has also developed a procedure that covers the following:

- Responsibilities for all levels of employees
- Method of analysing training needs and compiling training plans
- Assessment of competency
- Communication and awareness

The full procedure is attached on the documents link

 Nyanza Light Metals <small>World-class TIO, pigments</small>	<p>STANDARD PROCEDURE</p>	<p>No: NZA-HSE-SP-009-REV:00 DATE:19/07/2022</p>
<p>SUBJECT:</p>	<p>RESOURCES, TRAINING, COMPETENCY AND AWARENESS PROCEDURE</p>	
<ol style="list-style-type: none"> 1. PURPOSE 2. SCOPE 3. RESPONSIBILITIES 4. METHOD 5. REFERENCE 		

The following training has been conducted for staff:

- PPE destruction risk assessment- on-the-job training.
- Chemicals, handling, and storage procedure-on-the-job training.
- Emergency preparedness response procedure-on-the-job training.
- Coating risk assessment-on-the-job training.
- HI&RA procedure-on-the-job training.
- Occupational, health and safety policy-on-the-job training.
- SHE objectives and targets-on-the-job training.
- Incident investigation procedure-on-the-job training.
- Conducting RA-on-the-job training.
- PPE procedure-on-the-job training.
- Vehicle pre-trip inspection checklist-on-the-job training.
- Conduct incident investigation-on-the-job training.
- Legal and other requirement procedure-on-the-job training.
- Safety rules for driving company incident-on-the-job training.
- Toolbox first aid incident-on-the-job training.
- Near miss report-on-the-job training.
- General discussion of OHS Act 85 of 1993-on-the-job training.
- Legal liability-external training.
- Basic firefighting-external training.
- First aid training-external training

V. Emergency Preparedness and Response


Following the identification of all possible emergency situations, Nyanza has developed an Emergency Preparedness Response Plan. This plan identifies the types of emergencies we have planned for and evacuation routes and procedures for each of the different areas of the PTDC operation (office blocks, laboratory, canteen, workshop etc) as well as procedures associated with these emergencies. The following emergencies are covered:

- Fire
- Explosions
- Bomb & Bomb threats
- Labour unrest
- Fatal incidents
- Gas release
- Floods
- Snake bites
- Spillages

All staff working at the PTDC have been provided with appropriate Personal Protective Equipment (PPE). All staff, including the PTDC site manager have participated in emergency risk assessments and mock drills.

Currently, various consultations are taking place with emergency stakeholders (RBIDZ, Local municipality, fire departments, medical emergency agencies, local medical centres and hospitals) in order to ascertain capacity levels of these various agencies. Nyanza wants to be aware of capacity gaps that currently exist for emergency situations. The aim of these consultations is to conclude resource sharing agreements in respect of emergency situations, and ensure that our plans meet regulatory requirements and industry best practice. Furthermore, and as the zone of influence of our business activities expands to include adjacent communities, we will consult with affected communities and solicit input into these emergency preparedness response plans.



 Nyanza Light Metals <small>World class Pico pigments</small>	STANDARD PROCEDURE	No: NZA-HSE-SP-003-REV:00 DATE: 06/06/2022
	SUBJECT:	EMERGENCY PREPAREDNESS AND RESPONSE PROCEDURE

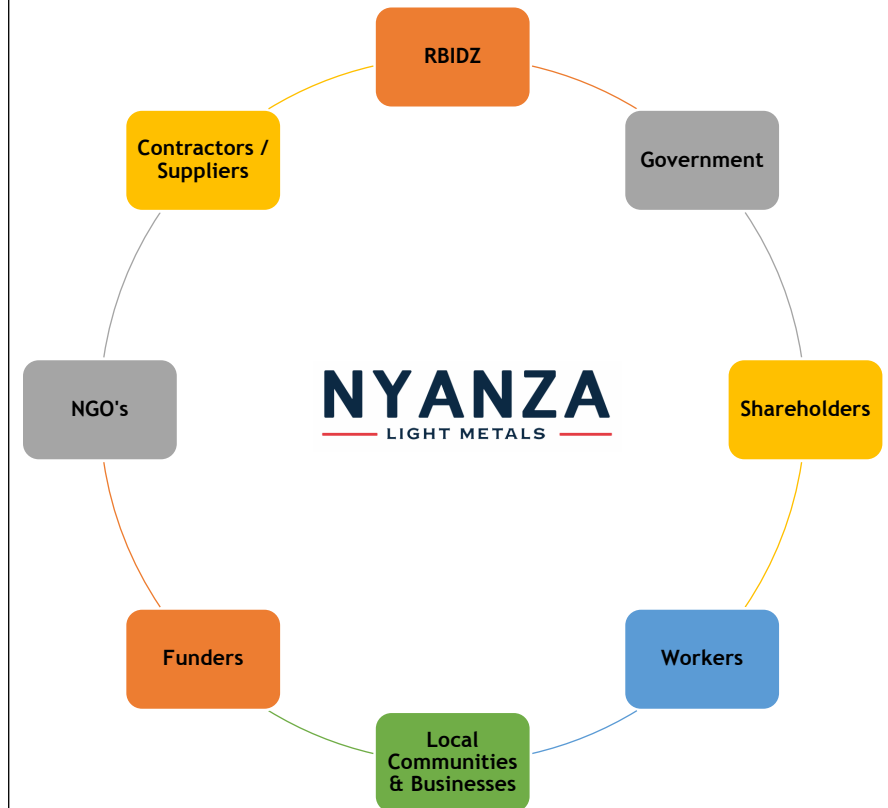
1. PURPOSE
2. SCOPE
3. RESPONSIBILITIES
4. EMERGENCY PREPAREDNESS RESPONSE FOR EACH SITE SPECIFIC AREA
5. PREPAREDNESS RESPONSE FOR OTHER GENERAL POTENTIAL EMERGENCIES
6. EMERGENCY NUMBERS
7. EMERGENCY MOCK DRILL INTERVAL AND AIR HORN SUPER SOUND
8. REFERENCES

VI. Stakeholder Engagement

Over and above its workers, Nyanza has a wide range of stakeholders who have an interest in the business. Responsibilities have been allocated as to which Nyanza personnel lead which engagements. The engagements with each of the stakeholder are based on a two-way communication and have been customised as may be appropriate:

- **RBIDZ:** Nyanza is a tenant of the RBIDZ and the first investor in Phase 1F of the RBIDZ. In order to manage the development of the Nyanza project, there are various task teams that have been set up between Nyanza and the RBIDZ to deal with specific work streams (e.g infrastructure task team, EIA & other Permits, etc)
- **Government:** Nyanza engages regularly with all levels of government e.g local municipality for provision of some utilities; District municipality for Emmissions licenses approvals; Provincial Environment department and KZN Premier’s office for environmental authorisations and Investor relations respectively; various national departments and agencies are also engaged for certain permits etc.
- **Shareholders:** The company is in constant engagements with Shareholders through regular updates and formal shareholder meetings.
- **Local Communities & Businesses:** Primarily the RBIDZ is the face of the zone and first line of contact for community members and local businesses. However, Nyanza is proactively identifying risks and implementing mitigation measures through a special technical sub-committee endorsed by the Board, the Stakeholder Engagement Committee, with specialist external expertise on stakeholder relations.
- **Funders:** Current and prospective funders are proactively engaged on all significant milestones of the project.
- **NGO’s:** There is one very active NGO, Richards Bay Clean Air Association which is proactively consulted on the EIA process in relation to Air Quality issues.
- **Contractors/Suppliers:** These are engaged by relevant line managers and the supply chain department, for the provision of products and services.


Nyanza will document its Stakeholder Engagement Plan to detail each of the above engagement modalities.



VII. External Communications and Grievance Mechanisms

External Communication

Due to the fact that Nyanza is located in the RBIDZ, local communities and local businesses and NGO's contact the RBIDZ first for any issues they might want to raise. However, Nyanza is proactively identifying risks and implementing mitigation measures through a special technical sub-committee endorsed by the Board, the Stakeholder Engagement Committee, with specialist external expertise on stakeholder relations. Nyanza's Consultation, Communication and Participation Procedure details procedures for communication both internally and externally. Responsibilities with regards to communication are also detailed in the procedure. The full procedure is attached on the document link.

 <p>Nyanza Light Metals <i>World-class TiO₂ pigments</i></p>	<p><u>STANDARD PROCEDURE</u></p>	<p>No:NZA-HSE-SP-005-REV:00 DATE:29/06/2022</p>
<p>SUBJECT:</p>	<p>CONSULTATION, COMMUNICATION AND PARTICIPATION PROCEDURE</p>	

1. PURPOSE
2. SCOPE
3. RESPONSIBILITIES
4. METHOD
5. RECORDS
6. REFERENCES
7. APPENDICES

VII. External Communications and Grievance Mechanisms...

Grievance Redress Mechanism

This section summarises the Grievance Redress Mechanism (GRM). The GRM provides a clear description of the formal process whereby stakeholders submit a grievance or report an incident regarding the Nyanza project, through the RBIDZ’s suggestion box and Nyanza’s email address, and within a predictable timeframe, would receive a response and a resolution (where possible) to the grievance. This process will be adhered to by Nyanza employees and contractors working on the project upon receipt of a stakeholder complaint. Although Nyanza has a Grievance mechanism, a complaint register and customer feedback register in place, there have been no grievances or complaints lodged so far. Even during the EIA processes for the PTDC and main plant, no complaints were received. In due course Nyanza will establish a toll-free telephone line to ensure anonymity and confidentiality of complainants. The Grievance Redress Mechanism aims to:

- Ensure that unwanted events with negative impacts on external stakeholders are dealt with swiftly and appropriately;
- Ensure that incidents, complaints and grievances are managed consistently to build trust in the legitimacy and efficiency of the procedure and system;
- Ensure that vulnerable people can log grievances in a non-threatening and accessible way;
- Allow Nyanza to identify and correct problems before they recur or escalate into more serious problems;
- Allow Nyanza to monitor and track stakeholder concerns, issues and complaints providing insight into how Nyanza is perceived by its external stakeholders;



16 January 2022

Nyanza Light Metals Complaints Register

(The Nyanza Light Metals Product Testing and Development Facility is not operational yet and no complaints have been registered)

No.	Name & Contact No. of Complainant	Date & Time	Mode of contact	Complaint Regarding	The Complaint	Action Taken	Date Actioned
1							
2							
3							
4							
5							
6							
7							

- Provide an efficient and low-cost means of resolving disputes and providing control measures where appropriate; and
- Elevate the credibility and reputation of Nyanza by efficiently demonstrating that the concerns of external stakeholders are taken seriously.

The mechanism applies to Nyanza and is aimed at addressing complaints, grievances and issues voiced by stakeholders due to perceived Nyanza impacts and/or incidents including, but not limited to, sociol-economic, environmental, health or safety aspects.

Monitoring Grievances

The grievance mechanism and its effectiveness will be reviewed by Nyanza’s General Manager Sustainability and Corporate Affairs together with the Stakeholder Engagement Committee, on a quarterly basis. Depending on the outcome of the review, the mechanism will be amended and disclosed to the stakeholders.

VIII. Ongoing Reporting to Affected Communities

Currently there are no communities affected by Nyanza’s operations as the operations are restricted to laboratory and office work for 15 staff. However, Nyanza is aware of the potential needs of adjacent communities and is in any event required by law to consult with local communities about the project. So far, the main means of proactively providing updates on the project has been through the Environmental Impact Assessment (EIA) process, through placing of adverts with project description in local newspapers, on adjacent properties, in English and Zulu. Furthermore, the RBIDZ, which is the direct interface with the public, has been provided with all project information and is at liberty to communicate project progress. In addition to all this, representatives of the Nyanza Stakeholder Committee have been proactively engaging community members through identified leadership structures, and informing them of opportunities that the project will bring in the area as well as communicating protocols for communication and future participation in economic opportunities.

As the project progresses and tangible impacts emerge, the reporting initiatives will be scaled up and not limited to the EIA process. There will be consultation and reporting required and implemented in relation to the following:

- Immediate updates on new E&S risks and present monitoring results on environmental issues that interest the communities.
- Emergency Preparedness Response and updates on community safety and security.
- Reporting progress on commitments made by Nyanza as well as project benefits.



• PUBLIC / LEGAL NOTICES •

APPLICATION FOR ENVIRONMENTAL AND WATER USE AUTHORISATIONS, WASTE MANAGEMENT AND AIR EMISSION LICENCES FOR THE PROPOSED (PHASE 2) NYANZA 80,000 tpa RUTILE PIGMENT PLANT WITHIN THE RICHARDS BAY INDUSTRIAL DEVELOPMENT ZONE 1F, KWAZULU NATAL PROVINCE

INVITATION TO REGISTER, PARTICIPATE AND COMMENT ON THE PROCESSES

Notice is hereby given in terms of the Environmental Impact Assessment (EIA) Regulations, (as amended on 1 April 2017 and 11 June 2021, promulgated in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), that Nyanza Light Metals (Pty) Ltd (Nyanza) is applying for an Environmental Authorisation (EA) and Waste Management Licence (WML) which will be submitted to the KwaZulu-Natal Department of Economic Development, Tourism & Environmental Affairs (KZN EDTEA) and Department of Forestry, Fisheries and the Environment (DFFE) respectively. Nyanza will also apply for an Air Emissions Licence (AEL) which will be submitted to the King Cetshwayo District Municipality and a Water Use Licence (WUL) which will be submitted to Department of Water and Sanitation (DWS) for the proposed (phase 2) Nyanza 80,000 tpa rutile pigment plant in Richards Bay Industrial Development Zone 1F, in KwaZulu Natal Province.


Proponent: Nyanza Light Metals (Pty) Ltd
Location: The proposed project site is located in uMhlathuze Local Municipality within the King Cetshwayo District Municipality, KwaZulu Natal Province. The details of the affected property are provided in Table 1-1.

Table 1-1: Affected ERF

IX. Monitoring and Review

Continual improvement on the ESMS will be possible as we implement the Plan-Do-Check-Act cycle. We have developed and a monitoring and measurement procedure as well as an Internal Audit Procedure which detail how audits will be done, the scheduling, responsibilities, frequency and methodology of the audits. The full procedures are on the document link.

Corrective actions are routinely implemented. As we progress in the implementation of employee performance reviews we will ensure that the E&S targets and objectives set in our ESMS, are streamlined into individual job descriptions and contracts. Currently there is a standing agenda item on EXCO and Board engagements to report on E&S matters. In the future, this reporting will be focused on E&S performance and continual improvement on our ESMS.

 <p>Nyanza Light Metals <i>World-class TIO, pigments</i></p>	<p><u>STANDARD PROCEDURE</u></p>	<p>No: NZA-HSE-SP-011-REV:00 DATE: 25/07/2022</p>
<p>SUBJECT:</p>	<p>INTERNAL AUDIT PROCEDURE</p>	

1. PURPOSE
2. SCOPE
3. DEFINITIONS
4. RESPONSIBILITIES
5. METHOD
6. REFERENCES

4. Conclusion

The write up contained in this document provides a summary of what is in place for the Nyanza ESMS. AS indicated the ESMS will be enhanced, scaled up and resourced as may be appropriate as the project progresses, its E&S risks increase and its impacts become more complex.