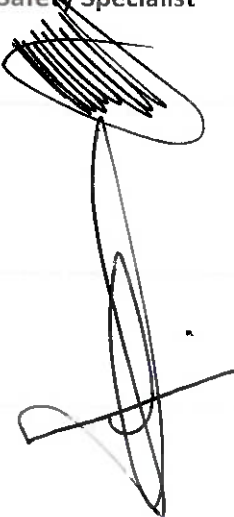





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# NYANZAGA GOLD PROJECT CONTRACTOR MANAGEMENT PLAN

## APPROVAL AND REVIEW

This Procedure is to be reviewed annually.

REV. NO.	PREPARED/ UPDATED BY	REVIEWED	APPROVED	DATE	DESCRIPTION/ CHANGE EFFECTED
01	Ruaan Grobbelaar Safety Specialist 	Clem Cox Construction Manager  Besim Ertem Mining Manager Stuart Fairley HSET Manager	 Matt Cavedon General Manager Nyanzaga Gold Project	30 Jan 26	New Document
				APPROVED. 4.02.26.	
			 HSET Manager Stuart Fairley		

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## 1. PURPOSE

This plan defines the minimum Health, Safety, Environment and Community (HSEC) management requirements for all contractors engaged on the Nyanzaga Gold Project, ensuring full compliance with ISO 45001:2018, Perseus Mining Sotta Limited (PMS) corporate standards, and Tanzanian legal obligations.

## 2. SCOPE

It applies to all Perseus-controlled worksites, contractors, subcontractors, and service providers performing work on or associated with the Nyanzaga Project.

## 3. OBJECTIVES

- Standardize contractor HSEC compliance, onboarding controls, and performance management across the full contractor lifecycle (pre-qualification through close-out), including use of the gated onboarding workflow (refer **Annexure E: Onboarding Process Flow**).
- Ensure contractors meet all applicable Tanzanian legal and regulatory obligations (including required registrations/approvals) and maintain auditable evidence of compliance.
- Confirm workforce suitability prior to mobilisation and during execution through documented personnel records/declarations, employment compliance expectations, and ongoing verification of statutory obligations where required by governance/contract.
- Embed a risk-based approach to work planning and execution by integrating risk assessments, JHAs, SOPs/SWIs, and Permit-to-Work requirements, aligned to high-risk activities.
- Integrate the Fatality Risk Management (FRM) framework to verify critical controls through planned monitoring, inspections, and corrective action close-out.
- Prevent fatalities, injuries, environmental harm, property damage, and security losses through proactive planning, supervision, incident prevention, and timely reporting and investigation of incidents and non-conformances.
- Establish consistent communication, consultation, and reporting mechanisms to support contractor coordination, learning, and continual improvement.
- Maintain controlled documentation and recordkeeping to support audits, regulatory review, and performance tracking, including retention and confidentiality expectations where applicable.
- Support effective contract administration and financial governance by requiring compliance to the conditions of contract, accurate progress/payment substantiation, coordinated

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procurement/logistics, and proper approvals, reporting, and records for the duration of the works.

## 4. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

### 4.1 DEFINITIONS

Term	Definition
“Act” / “OHSA”	Refers to the <i>Occupational Health and Safety Act, 2003 (Act No. 5 of 2003)</i> of the United Republic of Tanzania, including associated Regulations and amendments.
“Contractor”	Any company, organization, or individual engaged by Perseus Mining Sotta Limited (PMS) or its subsidiaries to perform work or provide services at the Nyanzaga Gold Project site, including subcontractors and labor hire personnel.
“Client” / “Company” / “Principal”	Refers to <i>Perseus Mining Sotta Limited (PMS)</i> , responsible for overall management, supervision, and coordination of the Nyanzaga Gold Project.
“Competent Person”	A person who has acquired, through training, qualification, or experience, the knowledge and skills to carry out a task safely and correctly, as defined under Section 3 of the OHSA 2003.
“Employee” / “Worker”	Any person employed directly or indirectly by the Contractor, including subcontractors and agency labor, who performs work at or related to the Nyanzaga Gold Project.
“Hazard”	A source, situation, or act with the potential to cause harm to people, property, the environment, or the Company’s reputation.
“Risk”	The combination of the likelihood of occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure.
“Risk Assessment”	The process of hazard identification, risk analysis, and evaluation to determine appropriate controls, in accordance with <i>PMS-HSE-FRM-10257</i> and <i>ISO 45001 Clause 6.1.2</i> .

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Term	Definition
“Incident”	Any unplanned event that results in, or has the potential to result in, injury, illness, damage, or environmental harm, including near misses.
“ICAM”	The <i>Incident Cause Analysis Method</i> , used to determine root causes of incidents and develop corrective actions.
“FRM”	<i>Fatal Risk Management</i> – a structured process to identify and control high-consequence risks in alignment with <i>PMS-HSE-STD-10263</i> .
“Permit to Work (PTW)”	A formal written authorization system to control high-risk work such as hot work, confined spaces, energy isolation, excavation, and working at heights ( <i>PMS-HSE-STD-10132</i> ).
“Superintendent / Supervisor”	Any person appointed by the Contractor or Company to supervise and control work execution, including enforcing safety requirements.
“HSE”	Health, Safety, and Environment. Refers to the integrated management of occupational health, safety, and environmental protection activities.
“OH” / “Occupational Health”	The discipline concerned with protecting the health of workers from risks arising from work activities, and with adapting work to people’s capabilities.
“ISO 45001”	The <i>International Standard for Occupational Health and Safety Management Systems (2018)</i> – framework for managing risks and opportunities to prevent work-related injury and ill health.
“PPE”	<i>Personal Protective Equipment</i> – all equipment intended to be worn or held by a person to protect against one or more health or safety risks ( <i>PMS-HSE-STD-10197</i> ).
“Emergency”	Any unplanned event requiring immediate response to prevent loss of life, property damage, or environmental harm.

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Term	Definition
“Subcontractor”	Any entity contracted by a primary Contractor to perform part of the contracted works or services.
“Workplace” / “Site”	Any location under the control of Perseus Mining Sotta Limited or its Contractors where work activities are undertaken.
“Verification”	The process of confirming through inspection, observation, or audit that activities or controls are implemented effectively and in accordance with this Plan and relevant standards.
“Document Control”	The management process is used to ensure documents are created, reviewed, approved, issued, and maintained in accordance with <i>PMS-COR-STD-001</i> and <i>ISO 9001 requirements</i> .
<b>Environmental Management Plan (EMP)</b>	A document describing how environmental impacts will be identified, controlled, and monitored during project activities in line with PML and legal requirements.
<b>Environmental Incident</b>	Any unplanned event that results in or could result in harm to the environment (e.g., spills, illegal clearing, waste discharge).
<b>Spill</b>	An unintended release of fuel, oil, or chemicals that may cause contamination to soil, water, or air.
<b>Waste</b>	Any material or substance that is no longer required and must be treated, recycled, or disposed of safely.
<b>Hazardous Waste</b>	Waste that poses a significant risk to health, safety, or the environment due to its chemical or physical characteristics.
<b>Permit to Clear (LCP)</b>	Authorisation issued by the PML Environmental Department to remove vegetation or disturb soil within approved work boundaries.
<b>Rehabilitation</b>	The process of restoring disturbed areas to a safe and stable condition acceptable to the PML Environmental Department.
<b>Local Content</b>	Requirements under applicable Tanzanian mining regulations and associated project governance processes aimed at maximising in-

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Term	Definition
	country participation (e.g., local procurement, employment, subcontracting/JVs) and any approvals/confirmations required for the contracted scope. Compliance confirmation is managed through Supply Chain governance processes.
Pre-Employment Screening	Site-required screening checks facilitated through HR governance processes, evidenced prior to access/badging and treated as a mobilisation gate where applicable.

## 4.2 ABBREVIATIONS AND ACRONYMS

Abbreviation	Meaning
CAPA	Corrective and Preventive Action
CMP	Contractor HSE Management Plan
EHS / HSE	Environment, Health and Safety
ERP	Emergency Response Plan
FRM	Fatal Risk Management
HIRA	Hazard Identification and Risk Assessment
ICAM	Incident Cause Analysis Method
ISO	International Organization for Standardization
JHA	Job Hazard Analysis
LOTO	Lock Out / Tag Out
OHSA	Occupational Health and Safety Act, 2003 (Tanzania)
OHSMS	Occupational Health and Safety Management System
PMS	Perseus Mining Sotta Limited
PPE	Personal Protective Equipment
PTW	Permit to Work
SHEQ / SHERQ	Safety, Health, Environment, Risk and Quality

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Abbreviation	Meaning
STD	Standard
WCF	Workers Compensation Fund (Tanzania)
EMA	Environmental Management Act (Cap 191 of 2004)
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
SDS	Safety Data Sheet
WMP	Waste Management Plan
NIDA	National Identification Authority (National ID)
NSSF	National Social Security Fund
TIN	Taxpayer Identification Number
SDL	Skills Development Levy
PAYE	Pay As You Earn
HESLB	Higher Education Students' Loans Board
HSEC	Health, Safety, Environment and Community
PML	Perseus Mining Limited

## 5. REFERENCES AND ALIGNMENT

### 5.1 CORPORATE AND INTERNATIONAL STANDARDS

- ISO 45001:2018 – Occupational Health and Safety Management Systems
- ISO 31000:2018 – Risk Management Principles
- ISO 14001:2015 – Environmental Management Systems
- PML-OHS-STD-001 – HSEC Standard
- PML-HSE-STD-10333 – Contractor HSE Management
- PML-HSE-STD-10263 – Fatality Risk Management
- PML-HSE-STD-10197 – Personal Protective Equipment
- PML-HSE-STD-10136 – Confined Space

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- PML-HSE-STD-10137 – Electrical Safety
- PML-HSE-STD-10138 – Cranes and Lifting
- PML-HSE-STD-10139 – Energy Isolation
- PML-HSE-STD-10140 – Vehicles and Driving
- PML-HSE-STD-10131 – Working at Height
- PML-HSE-STD-10132 – Permit to Work
- PML-HSE-STD-10133 – Management of Stored Energy
- PML-HSE-STD-10261 – Excavation and Penetration
- PML-HSE-STD-10264 – Explosives Management
- PML-HSE-STD-10273 – Hand and Power Tools
- PML-HSE-FRM-10257 – Job Hazard Analysis
- PMS-WHS-PLN-001 – Nyanzaga Safety Management Plan
- AUS-SUP-STD-0575 – Procurement Standard
- AUS-LEG-STD-0573 – Legal and Contracts Standard
- PMS-HSE-STD-10198 – Incident & Hazard Reporting
- PML-HSE-STD-10421 – Unsafe Underground Atmosphere Management (if applicable)
- PML-HSE-STD-10420 – Underground Ventilation Management (if applicable)
- PML-HSE-STD-10419 – Fall of Ground – Underground (if applicable)
- PML-HSE-STD-10418 – Underground Fire or Explosion (if applicable)
- PML-HSE-STD-10417 – Exploration Drilling Safety (if applicable)
- PML-HSE-STD-10334 – Aviation Risk Management
- PML-HSE-STD-10343 – Drug and Alcohol Screening
- PML-HSE-STD-10342 – Fatigue Management
- PML-HSE-STD-10198 – Incident and Hazard Reporting
- PML-HSE-STD-10201 – Incident Classification and Analysis
- Environmental Impact Assessment (EIA) Certificate – Nyanzaga Gold Project
- PML Environmental Policy and EMP

Note: Where a standard exists under both PMS and PML prefixes, contractors must comply with the latest approved Perseus corporate standard and any Nyanzaga site-specific supplements issued under PMS.

## 5.2 TANZANIAN LEGAL FRAMEWORK

- Occupational Health and Safety Act (No. 5 of 2003)
- Workers Compensation Act (2008)

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- Mining (Safety, Occupational Health and Environmental Protection) Regulations (2010)
- Employment and Labour Relations Act (2004)
- Environmental Management Act (2004)
- Fire and Rescue Services Act (2007)
- Environmental Management Act (EMA) Cap 191 of 2004,

### 5.3 ADDITIONAL SITE PROCEDURE REFERENCE (ACCESS CONTROL)

- PMS-SEC-SOP-001 – Access Control Standard Operating Procedure (Access Control SOP).
- Associated forms (as applicable): Site Access and Badge Issue Request Form; ID card change/replacement request.

## 6. ROLES AND RESPONSIBILITIES

Role	Responsibilities
<b>Contract Owner</b>	Ensures OHSA and WCF registration, contractor HSE plan approval, and ongoing compliance. Ensures contract compliance checks occur; escalations for commercial non-compliance and payment governance
<b>Contract Administrator</b>	Manages contractor onboarding, recordkeeping, and audit scheduling. Coordination of commercial meeting minutes/actions, tracking commercial deliverables/records (aligned to contract conditions)
<b>HSE Manager</b>	Oversees compliance with ISO 45001 and PMS standards; conducts Critical Control Verification (CCV) and audits.
<b>Contractor Representative</b>	Implements and maintains adherence to all PMS standards and Tanzanian legal requirements.
<b>Supply Chain / Procurement (Client)</b>	Manages Local Content compliance governance processes and confirms Local Content compliance (where applicable) as part of contractor approval and onboarding. Coordinate planned deliveries and provide delivery forecasts to support controlled entry; coordinate delivery access and escort arrangements to designated unloading areas as required.
<b>Security Manager (Client)</b>	Approves access/badging requirements, manages site access control rules, and coordinates contractor laydown security arrangements through the on-site contracted Security company.

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Role	Responsibilities
<b>Security Badging Office (Client)</b>	Processes approved Site Access and Badge Issue Request Forms, captures photographs, prints/programs access cards, and issues/deactivates/re-issues access badges as required.
<b>Human Resources (Client)</b>	<p>Facilitates contractor pre-employment screening processes and confirms screening evidence is complete as a prerequisite for access/badging and mobilization.</p> <p>Confirms required personnel records/declarations are provided where applicable (e.g., identification/NIDA, NSSF, TIN, bank details, and confirmation of 18 years and above).</p> <p>Provides site HR expectations to contractors during onboarding and supports contractor compliance with recruitment requirements and minimum salary bands/rates applicable to site.</p> <p>Receives and reviews evidence of statutory payroll-related payments where required by contract/governance (e.g., NSSF, WCF, SDL, PAYE, HESLB) and escalates non-compliance to the Contract Owner.</p> <p>Coordinates HR-related onboarding recordkeeping controls (confidentiality, access, retention) in alignment with site governance.</p>
<b>Support Services (Client)</b>	Reviews and signs off access/badging requests as part of site access governance and supports enforcement of access/egress control requirements.
<b>Contractor Site HR / Project Manager</b>	Ensures contractor employment and HR compliance requirements are implemented for the workforce mobilized to site, including provision of employment contracts, local recruitment and vacancy advertising (where applicable), and submission of required personnel records and statutory payment evidence to PMS HR as required.
<b>Commercial Manager / Contracts (Client)</b>	<p>Owns contract administration and financial governance in line with the conditions of contract.</p> <p>Leads commercial compliance checks, payment governance, programme/payment alignment, variations/lumpsum tracking, and commercial recordkeeping.</p> <p>Chairs/participates in weekly commercial meetings with Contract Owner/Contract Administrator and Contractor commercial rep.</p>

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Role	Responsibilities
<b>Finance / Accounts Payable (Client)</b>	<p>Verifies interim payment applications are complete (supporting documentation, approvals) before payment processing.</p> <p>Maintains payment records and supports audit trail for contract payments and statutory/withholding requirements (as applicable per contract/governance).</p>
<b>Procurement &amp; Logistics (Client)</b>	<p>Coordinates procurement/logistics activities to ensure timely delivery of materials/services.</p> <p>Maintains procurement records and ensures purchasing aligns to site governance (including Local Content governance interface where applicable).</p>
<b>Contractor Commercial Representative (Contractor)</b>	<p>Submits interim payment applications with accurate supporting documentation and progress evidence.</p> <p>Maintains records of lumpsum/variations (where applicable) and attends weekly commercial meetings.</p> <p>Coordinates contractor procurement/logistics planning and reporting to align with the approved programme.</p>
<b>Host / Receiving Department (Perseus)</b>	<p>Pre-clear unscheduled visits/deliveries with Security where required, ensure visitor/contractor escort/supervision while on site, and confirm visit purpose and permitted work areas. Ensure visitors comply with site rules, PPE, and emergency requirements.</p>
<b>Line Management / Department Manager (Perseus)</b>	<p>Assess and approve long-term/regular contractor access card requirements (where applicable) and request enabling/disabling of access when personnel are not actively working on site. Ensure hosts/receiving departments are assigned for visitor control and escort.</p>

## 7. CONTRACTOR LIFECYCLE OVERVIEW

Contractor onboarding is managed through a gated workflow from pre-qualification through mobilisation, execution and demobilisation/close-out to ensure legal compliance, risk controls and verified competency are in place before work commences. The end-to-end onboarding workflow, required deliverables, responsibilities and records are defined in Annexure E: Onboarding Process Flow and shall be used as the mobilisation checklist for each contractor and subcontractor.

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## 7.1 PRE-QUALIFICATION

Contractors must submit: -

- OHSWA workplace registration certificate
- WCF registration evidence
- Business license and tax compliance
- HSE statistics, incident records, and competence matrix
- Local Content compliance confirmation (where applicable)

Local Content compliance (where applicable):

In addition to HSE and legal compliance requirements, contractors may be subject to Local Content obligations in accordance with Tanzanian mining regulations. Confirmation of Local Content compliance, where applicable, shall be obtained as part of the contractor approval and onboarding process. Local Content compliance is managed through Supply Chain governance processes.

## 7.2 ACCESS / EGRESS CONTROL (PERMANENT / CONTRACTOR / VISITOR)

- No person may access the site unless the formal access/badging process has been completed and approved.
- Completion of the Site Access and Badge Issue Request Form by the relevant Perseus Department requesting access.
- Mandatory sign-off on the form by: PMS HOD; Support Services; Construction Manager; Security Manager.
- Submission of the approved form(s) by the Perseus Department to the Security Badging Office for processing.
- Security Badging Office processing to include photograph capture; card printing; card programming; and issue of the access/egress card to the individual.
- Access badges/cards shall be worn and visible at all times while on site.
- Lost or stolen cards shall be reported immediately to Security for deactivation and re-issue.

### 7.2.1 CONTRACTOR PRE-EMPLOYMENT SCREENING (HR / SECURITY INTERFACE)

- All contractor personnel requiring access shall complete pre-employment screening in accordance with site requirements.
- Evidence of screening shall accompany the Site Access and Badge Issue Request Form (screening process accommodated by HR).
- Pre-employment screening is a mobilisation gate requirement; contractor personnel shall not be badged or mobilised until screening documentation is complete.

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**7.2.2 HR ONBOARDING AND EMPLOYMENT COMPLIANCE REQUIREMENTS**

- Where applicable, contractors shall comply with Nyanzaga site HR onboarding requirements as part of contractor approval and mobilisation. HR requirements are managed through Supply Chain and HR governance processes; however, confirmation of compliance must be available for audit and regulatory review.
- Personnel records and declarations: Contractor personnel records/declarations shall be available where applicable to the scope and contract requirements, including identification/NIDA, NSSF, TIN, bank account details, and confirmation that personnel are 18 years and above.
- Onboarding kick-off meeting: Following engagement/award, a kick-off meeting shall be held with the contractor Project Manager and/or Contractor Site HR to confirm site expectations for recruitment, employment administration, statutory compliance, and workforce management prior to mobilisation.
- Recruitment and local employment: Contractors shall apply recruitment practices that support local community participation for local skills where available. Where unskilled or semi-skilled labour is required, contractors shall coordinate recruitment through PMS HR in accordance with site processes. Vacancies for unskilled and semi-skilled positions should be advertised locally where practicable.
- Employment contracts: Employment contracts shall be provided to all contractor employees working on the PMS site.
- Statutory payroll compliance: Contractors remain responsible for payment of all statutory payroll-related contributions and taxes applicable to the workforce and shall provide receipts/evidence to PMS HR where required by contract/governance, including NSSF, Workers Compensation Fund (WCF), Skills Development Levy (SDL), PAYE, and Higher Education Student Loan Board (HESLB) (as applicable).
- Overtime and public holidays: Overtime and public holiday work shall be compensated in accordance with the Employment and Labour Relations Act and applicable site/contract requirements.
- Minimum salary bands: PMS will communicate applicable minimum salary bands/rates for site, and contractors shall implement these as a minimum standard for their workforce.
- Non-compliance: Where statutory contributions are not paid as required, PMS may apply contractual remedies (including withholding/offset) in accordance with contract terms and applicable law.

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### 7.2.3 LAYDOWN AREAS AND PHYSICAL SECURITY ARRANGEMENTS

- Where a contractor requires dedicated security for laydown areas, security will be provided by the on-site contracted Security company at the requesting contractor's cost.
- No external security companies are permitted to operate on site under any circumstances.
- Contractors shall coordinate all laydown security requirements through the Security Manager / Site Security to ensure alignment to site security arrangements and access control.

### 7.2.4 CONTRACTOR SECURITY COMPLIANCE OBLIGATIONS

- Comply with site security rules and instructions at all times, including access restrictions and controlled areas.
- Ensure visitors under their supervision always follow the approved visitor access process.
- Immediately report security incidents, suspicious activity, theft, or loss of property to Security and the Contract Owner.

### 7.2.5 ADDITIONAL SITE ACCESS CONTROLS (NON-SECURITY SENSITIVE):

- Visitor and short-term contractor access: Visitors/short-term contractors shall only be admitted once the required induction is completed. A visitor badge shall be issued at the gate, with photo ID presented and managed in accordance with site gate processes. Visitors shall be recorded in the visitor logbook and escorted by a nominated host at all times. Visitors/contractors shall provide and wear required PPE.
- Emergency accountability: Gate/visitor records shall support emergency mustering and site accountability arrangements.
- Long-term/regular contractor access cards: Long-term/regular contractor personnel may be issued an access card subject to line management approval. Where personnel are not actively working on site (no planned work period), access may be disabled until re-mobilisation is confirmed.
- Deliveries and logistics-controlled access: Logistics shall coordinate planned deliveries and provide delivery forecasts to support controlled entry. Delivery drivers/visitors shall follow the controlled entry process and be escorted to designated delivery/unloading areas as required.
- Unscheduled/urgent arrivals: Unscheduled vendor/supplier deliveries and urgent technical callouts shall be pre-cleared by the receiving department/host and Security notified prior to entry. Escort and controlled entry requirements remain applicable.
- Access card rules: Access cards/badges are personal, must be worn visible while on site, and must not be shared. Cards remain the property of the site and shall be returned on request and at contract completion. Loss/theft shall be reported immediately for deactivation and re-issue.

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### 7.3 CONTRACTOR CATEGORIES AND ONBOARDING REQUIREMENTS

To ensure a risk-based and proportionate onboarding process, contractors are categorised based on duration, manpower, scope, and risk profile. The Contract Owner, supported by the Site HSE Manager (or delegate), shall confirm the category during pre-qualification and may escalate requirements where risk warrants.

Onboarding requirements below are applied in accordance with the gated onboarding workflow in Annexure E: Onboarding Process Flow. Where scope, duration, workforce size or risk profile changes, the contractor category and onboarding controls shall be reassessed and any additional requirements implemented before continuing work.

**Note:** Any contractor performing high-risk work under Fatal Risk Standards (e.g., Working at Heights, Confined Space, Electrical/LOTO, Lifting, Excavation, Hot Work, Explosives, Mobile Equipment operations) must meet the applicable standard requirements and Permit-to-Work / JHA controls regardless of category.

#### 7.3.1 CATEGORISATION CRITERIA (APPLY THE MOST STRINGENT TRIGGER):

- Duration of engagement (e.g., >3 months vs ≤3 months).
- Workforce size (including subcontractors) and level of workforce turnover.
- Work type and risk profile (presence of FRM high-risk work, SIMOPS exposure, interaction with operations/mining traffic).
- Use of high-risk plant/equipment (cranes, lifting tackle, mobile equipment, pressure systems, electrical installations, explosives).
- Work location (operational areas, process plant, mining areas, confined spaces, elevated structures).
- Environmental/community risk (chemical use, waste generation, land disturbance, spill potential).

#### 7.3.2 CATEGORY 1: LONG-TERM CONTRACTORS (FULL CONTRACTOR HSE FILE REQUIRED)

- Typical criteria: contract duration >3 months; or significant manpower; or ongoing construction/mining support; or repeated high-risk work; or sustained presence in operational areas.
- Minimum onboarding / mobilisation requirements (as applicable to scope): *Annex G (a): Contractor HSE File Index – Long Term*
  - Full pre-qualification pack (legal registration, WCF, tax/business licences, insurances).
  - Approved Contractor HSE Plan (submitted and approved prior to mobilisation).

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- Full Contractor HSE File (as per Annex G index) including competency/training registers, medical fitness, risk assessments/JHAs, PTW records, equipment certifications/inspections, incident management, audits/inspections, FRM/critical control verification evidence, environmental requirements, and document control records.
- Induction (client + contractor + task-specific) and ongoing refresher training (where applicable).
- Weekly dashboard reporting and participation in contractor coordination and HSE meetings.
- Planned audit schedule (internal + joint + corporate/external where required).

**7.3.3 CATEGORY 2: SHORT-TERM CONTRACTORS (SHORT-TERM HSE FILE)**

- Typical criteria: engagement ≤3 months; limited manpower; clearly defined scope; lower exposure to SIMOPS; not performing sustained high-risk work (where high-risk work exists, escalate to Category 1 controls for that work).
- Minimum onboarding / mobilisation requirements (Short Term HSE File): *Annex G (b): Contractor HSE File Index – Short Term, Service, Consultants*
  - Legal compliance evidence relevant to scope (e.g., workplace registration/WCF where applicable).
  - Scope-specific risk assessment/JHA(s) and method statement/SOP(s) for the work to be performed.
  - Site induction + task/work-front briefing; proof of competence for the work (licenses/certificates).
  - Medical fitness evidence for safety-critical roles and exposure-based surveillance where applicable.
  - PTW compliance for any high-risk tasks (permits, isolations, authorisations) and verification of critical controls.
  - Equipment inspection/maintenance evidence for tools/plant brought to site (as applicable).
  - Incident/hazard reporting requirements acknowledgment and participation in close-out of actions.
  - Emergency response arrangements and contacts (including muster and first aid/medical arrangements).
  - Document control: controlled copies of procedures/forms used on site and retention of records for the duration of work + contractual/legal retention.

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**7.3.4 CATEGORY 3: SERVICE CONTRACTORS**

- Typical criteria: vendor/service teams undertaking routine maintenance, inspections, calibration, specialist servicing, or callouts (often intermittent).
- Minimum onboarding requirements (service pack):
  - Service scope and schedule defined (including SIMOPS interface and work area access requirements).
  - Competency evidence for technicians and supervisors; authorisations where required (electrical, lifting, HV switching, etc.).
  - Site induction appropriate to access level; escorted access where specified by PMS.
  - Task risk assessment/JHA and PTW for any controlled activities (hot work, isolation, work at height, confined space, lifting).
  - Equipment certification/inspection records for any lifting gear, test equipment, electrical tools or plant used.
  - Service records / job cards submitted after each visit (including defects identified, actions taken and follow-up requirements).
  - Escalation rule: repeated/extended service presence, increase in manpower, or high-risk work frequency triggers upgrade to Category 2 or 1 requirements.

**7.3.5 CATEGORY 4: CONSULTANTS (ADVISORY / PROFESSIONAL SERVICES)**

- Typical criteria: consulting professionals providing advisory, design, assurance, surveys, or specialist support. Most consultant activities are office-based; site access is controlled by induction and access permissions.
- Minimum onboarding requirements (consultant pack):
  - Site induction appropriate to visit type (visitor/office-based vs field-based).
  - Proof of competence/credentials relevant to the service provided and any statutory role obligations.
  - Fit-for-work declaration and medical fitness where required by site rules or the nature of field activities.
  - PPE compliance and site rules acknowledgment (including stop-work authority and incident/hazard reporting).
  - If consultants perform field activities (e.g., surveys, inspections in operational areas) they must meet Category 2 requirements for those activities (JHA/PTW, supervision, equipment inspections).
  - Consultant deliverables must be controlled documents where they influence operational controls (design changes, procedures, risk assessments) and must follow document control and approval processes.

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- Approval and escalation:
- The Contract Owner and Site HSE Manager (or delegate) shall confirm the contractor category during pre-qualification and document the decision.
- Where risk, work conditions, SIMOPS exposure or performance indicate, PMS may escalate any contractor to a higher category or require additional evidence/controls at any time.
- Regardless of category, contractors must comply with all applicable Fatal Risk Standards and legal requirements relevant to their scope of work.

**7.4 HSE PLAN REVIEW**

Each Contractor HSE Plan shall demonstrate compliance with the Perseus Fatality Risk Management (FRM) Program and address all relevant **Fatal Risk Standards**, which define the minimum control requirements for high-risk work. As a minimum, contractor HSE Plans must reference and align to the following Perseus Fatal Risk Standards applicable to their scope of works including but not limited to: -

- **Working at Heights (PMS-HSE-STD-10131)** – Controls for fall prevention, scaffolding, elevated work platforms, and harness systems.
- **Confined Spaces (PMS-HSE-STD-10136)** – Atmospheric testing, entry permits, isolation controls, and emergency retrieval.
- **Electrical Safety (PMS-HSE-STD-10137)** – Lockout/tagout, verification of de-energization, and competency of electricians.
- **Cranes and Lifting (PMS-HSE-STD-10138)** – Lifting plans, rigging integrity, exclusion zones, and competent personnel.
- **Energy Isolation (PMS-HSE-STD-10139)** – Isolation registers, tagging protocols, and verification steps before work.
- **Vehicles and Driving (PMS-HSE-STD-10140)** – Journey management, defensive driving training, fatigue management, and in-vehicle monitoring.
- **Aviation Activities (if applicable) – PML-HSE-STD-10334**
  - Where aviation is used to support the work scope (charter flights, medevac, geophysical surveys, or RPAS/drone operations), the contractor shall comply with the Perseus Aviation Risk Management Standard.
  - Aviation providers must be approved by Perseus and covered by a contract detailing scope, emergency response provisions, and compliance with civil aviation regulations.

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- Preference shall be given to scheduled airlines with IOSA certification; charter operations must comply with the standard’s critical controls (e.g., passenger manifests and briefings, fit-for-duty flight crew).
- Any variation to the Aviation Risk Management Standard requires review by the General Manager HSEC and approval by the Chief Sustainability Officer (where applicable to Perseus-controlled aviation).
- **Excavation and Penetration (PMS-HSE-STD-10261)** – Ground support, shoring requirements, and underground service identification.
- **Explosives Management (PMS-HSE-STD-10264)** – Blasting authorizations, segregation and storage of explosives, exclusion zones, and security.
- **Hand and Power Tools (PMS-HSE-STD-10273)** – Tool inspection, maintenance, guarding, and ergonomic use.
- **Management of Stored Energy (PMS-HSE-STD-10133)** – Control of pressurized, mechanical, hydraulic and pneumatic energy sources.
- Additional Perseus Standards applicable to contractor scope of work (where relevant):
- Incident and Hazard Reporting (PML-HSE-STD-10198) – reporting, notification and investigation requirements.
- Incident Classification and Analysis (PML-HSE-STD-10201) – consistent classification, SPE identification and trending.
- Fatigue Management (PML-HSE-STD-10342) – fatigue risk assessment, roster controls, hours of service and fit-for-duty requirements.
- Drug and Alcohol Screening (PML-HSE-STD-10343) – fit-for-work requirements, testing triggers (pre-placement, post-incident, reasonable suspicion, random).
- Aviation Risk Management (PML-HSE-STD-10334) – requirements for charter flights / RPAS / aviation logistics (if used).
- Exploration Drilling Safety (PML-HSE-STD-10417) – drilling campaign risk assessment, inspections, JHA and supervision (if drilling is in scope).
- Underground Ventilation / Atmosphere / Fire & Explosion / Fall of Ground – PML-HSE-STD-10420 / PML-HSE-STD-10421 / PML-HSE-STD-10418 / PML-HSE-STD-10419 (if underground activities are in scope): implement relevant controls, plans and monitoring.
- PML-HSE-STD-10333 – Contractor HSE Management Standard
- PML-HSE-POL-10186 – Health, Safety and Wellbeing Policy
- PML-HSE-STD-10197 – Personal Protective Equipment Standard

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- PML-HSE-FRM-10257 – Job Hazard Analysis (JHA) Form
- PML-HSE-STD-10261 – Excavation and Penetration Standard
- PML-HSE-STD-10264 – Explosives Management Standard (if applicable)
- PML-HSE-STD-10265 – Hot Work Standard
- PML-HSE-SOP-10259 – Incident Investigation Procedure (ICAM)
- PML-HSE-FRM-10260 – Mobile Equipment and Auxiliary Equipment Isolation Procedure
- PML-HSE-STD-10273 – Hand and Power Tools Standard

Each HSE Plan must show how these standards are integrated with the contractor’s risk assessment process (Job Hazard Analysis – PMS-HSE-FRM-10257) and critical-control verification aligned to the FRM program requirements

**APPROVAL REQUIREMENT:** The Contractor HSE Plan shall be submitted for review and must be approved in writing by the Contract Owner and the Site HSE Manager (or delegate) prior to mobilisation and commencement of work. Any material change to scope, methodology, risk profile, or critical controls requires re-submission and re-approval.

The Contractor HSE Plan shall also meet the requirements of the Contractor HSE Management Standard (PML-HSE-STD-10333) and be appropriate to the scope and risk level of works.

## 7.5 INDUCTION AND TRAINING

### 7.5.1 INDUCTION REQUIREMENTS

All contractor personnel shall complete site-specific inductions applicable to their work area (site, mine and/or process plant) prior to starting work.

Induction and training are onboarding gates. No person may be issued with site access, authorised for high-risk work, or permitted to commence work until the applicable onboarding steps and verification requirements in Annexure E: Onboarding Process Flow have been completed and confirmed by the Contract Owner and/or PML HSE (as applicable).

Access/badging approval and pre-employment screening (where required) are also onboarding gates; no person may be issued with a site access card or permitted to mobilise until these requirements are completed and confirmed.

Contractors shall provide evidence of regulatory licences/certification for specialist work and supply proof of qualifications/experience for statutory and supervisory roles.

Long-term contractors (contract duration > 3 months) shall complete refresher training as required by Perseus.

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For specified high-risk tasks (e.g., high voltage switching), personnel must be approved by Perseus appointed persons; approval may include practical demonstration of competence.

- **Client Induction:** Introduces Perseus HSEC policies, Code of Conduct, and life-saving rules.
- **Project-Specific/Contractor Induction:** Covers contractor scope specific hazards, emergency procedures, environmental aspects, and community relations.
- **Task-Specific / Work-Front Induction:** Conducted before assignment to critical tasks such as confined space entry, working at height, or lifting operations.
- **Refresher Inductions:** Conducted every 12 months or sooner if procedures, standards, or work scope change.

### 7.5.2 HR-RELATED INDUCTION CONTENT AND ACKNOWLEDGEMENTS

HR-related induction content shall include, as applicable: code of conduct and respectful workplace expectations; grievance and reporting channels; drug and alcohol expectations; fatigue/fitness for work expectations; recruitment expectations (including local recruitment requirements where applicable); and minimum salary band/rate expectations communicated by PMS.

Acknowledgement of HR-related induction content (as applicable) shall be captured via signed induction registers/forms and retained as part of the Contractor Training & Competency Register (Annex B) and filed within the Contractor HSE File (Annex G) subject to confidentiality controls.

### 7.5.3 COMPETENCY & VERIFICATION

- All operators, supervisors, and tradespeople must provide proof of competence (licenses, certificates, or training records).
- Competency verification aligns with ISO 45001 Clause 7.2 (Competence) and shall be documented in the Contractor Training & Competency Register (Annex B).
- Where gaps exist, contractors must implement targeted training before work commences.

### 7.5.4 TRAINING DELIVERY AND RECORDS

Training and competency records are a mobilisation prerequisite. Evidence that required induction, task-specific training, licences/authorisations and SOP/SWI competency have been completed shall be verified against the onboarding workflow (Annexure E: Onboarding Process Flow) prior to work commencement.

- Training materials delivered in **English and Kiswahili**, supported by visual aids for clarity.
- Attendance captured electronically or via signed registers.
- Records retained within the Contractor HSE File (Annex G) for audit and compliance verification.

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## 7.6 RISK MANAGEMENT

### 7.6.1 RISK ASSESSMENT PROCESS

Contractors shall utilise Perseus risk tools (Take 5 and Job Hazard Analysis) or an approved equivalent.

A JHA shall be completed before commencing the task and reviewed whenever scope, conditions or controls change; if the scope changes, the job must stop and the JHA must be reviewed (PML-HSE-FRM-10257).

Where required by the risk assessment, work shall be controlled under the Permit-to-Work system and linked to applicable Fatal Risk Standards and critical controls as indicated below:-

- PML-HSE-STD-10131 – Working at Height Standard
- PML-HSE-STD-10132 – Permit to Work Standard
- PML-HSE-STD-10133 – Management of Stored Energy Standard
- PML-HSE-STD-10134 – Machine Guarding and Conveyor Safety Standard
- PML-HSE-STD-10135 – Fall of Ground Surface Standard
- PML-HSE-STD-10136 – Confined Space Standard
- PML-HSE-STD-10137 – Electrical Safety Standard
- PML-HSE-STD-10138 – Cranes and Lifting Standard
- PML-HSE-STD-10139 – Energy Isolation Standard
- PML-HSE-STD-10140 – Vehicles and Driving Standard

The Following assessments must be conducted and approved by the relevant Perseus representative before any mobilization of works commence.

- **Baseline Risk Assessments:** Identify project-wide and recurring risks at the mobilization stage.
- **Task-Specific Risk Assessments / Job Hazard Analysis (JHA – PMS-HSE-FRM-10257):** Required for all site activities prior to work.
- **Job Hazard Analysis Updates:** Conducted when conditions, personnel, or equipment change.
- **Continuous / Dynamic Risk Assessment (Take 5):** Used by field personnel to reassess hazards immediately before starting a task

### 7.6.2 STANDARD OPERATING PROCEDURES (SOPS) / SAFE WORK INSTRUCTIONS (SWIS)

In addition to JHAs (task-level risk assessments), contractors shall develop and implement SOPs/SWIs to define the safe method of work for routine and critical tasks. SOPs/SWIs must reflect identified hazards and required controls and support consistent execution of work. These requirements align to PMS-WHS-PLN-001 (Operational Control) and PML-OHS-STD-001 (Operational Control – SOPs).

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SOPs/SWIs are mandatory for each “critical task” identified through formal risk assessment, including (as applicable): high-risk activities governed by Perseus Fatal Risk Standards, Permit-to-Work activities, safety-critical equipment operation, and tasks with potential for significant environmental impact if uncontrolled.

- **Development requirements**
  - SOPs/SWIs shall be developed using an approved **JHA as the baseline**.
  - SOPs/SWIs shall clearly describe, as applicable:
    - Scope and task steps (sequence of work)
    - Required tools, plant, and equipment
    - Hazards and controls aligned to the **Hierarchy of Controls**
    - **Critical controls and hold points** (including verification/authorization points)
    - Permit requirements and isolations (e.g., PTW, LOTO, confined space, WAH, lifting, excavation)
    - PPE requirements (minimum and task-specific)
    - Supervision and roles/responsibilities (including competent persons/authorized roles)
    - Emergency response requirements (including emergency actions, communications, first aid arrangements) *Category 1 Contractors may be requested to assist/Join the site emergency response and training programs*
    - Environmental controls (e.g., spills prevention/response, waste handling, dust/noise controls)
    - Required records and checks (e.g., pre-start inspections, checklists, signoffs, permits, logs)
  
- **Document control and availability**
  - SOPs/SWIs shall be produced using the approved site template.
  - SOPs/SWIs shall be subject to document control requirements, including:
    - Unique document ID
    - Revision number and revision history
    - Author/owner and approver details
    - Approval status and effective date
  - SOPs/SWIs shall be readily available at the point of use (e.g., work area, supervisor pack, controlled electronic access).
  - Superseded SOPs/SWIs shall be removed from circulation to prevent unintended use.

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- **Review and update**
  - SOPs/SWIs shall be reviewed at least every two (2) years.
  - SOPs/SWIs shall be reviewed and updated whenever required, including:
    - After a significant incident or near miss
    - Following a critical control failure or degradation
    - Following an audit/inspection finding or non-conformance
    - Where there is a change in scope, method, tools/equipment, materials, or workforce competency
    - Where legal requirements, client standards, or site standards are updated
  - Updates shall be communicated to affected personnel before task restart and prior to resuming work under the revised method.
- **Training and competency linkage**
  - All personnel performing or supervising work covered by an SOP/SWI shall be trained and competency-assessed in the applicable SOP/SWI before undertaking the task.
  - SOP/SWI training shall form part of:
    - Site/contractor induction (where relevant)
    - Task-specific training and pre-task briefings/toolbox talks
    - Refresher training requirements where risk profile, critical controls, or frequency of task warrants it
  - Evidence of SOP/SWI training and competency assessment shall be:
    - Recorded in the Contractor Training & Competency Register (Annex B)
    - Retained within the Contractor HSE File (Annex G)

**7.6.3 INTEGRATION WITH FATALITY RISK MANAGEMENT**

- Each task-level JHA must reference applicable Fatal Risk Standards (Section 9).
- Critical controls are verified in-field by supervisors and HSE representatives.
- Monthly FRM verification results are submitted with the contractor’s HSE report.

**7.6.4 CONTROL IMPLEMENTATION AND MONITORING**

- Controls applied according to the Hierarchy of Controls (Elimination → Substitution → Engineering → Administrative → PPE).
- All controls documented, reviewed, and signed off by the supervisor responsible.

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- High-risk work not permitted without an approved Permit-to-Work and verified controls in place.

#### 7.6.5 RECORD KEEPING AND REVIEW

- All risk assessments are retained within the Contractor HSE File.
- Review required whenever incidents, audit findings, or procedural changes occur.

#### 7.6.6 ACCESS CONTROL RECORDKEEPING (FOR AUDIT AND EMERGENCY ACCOUNTABILITY):

- Approved site access/badge request forms and any deactivation/re-issue records (where applicable).
- Visitor/contractor logbook records retained at the gate (supports emergency mustering/accountability).
- Planned delivery schedules/forecasts and delivery access records maintained by Logistics/receiving department (as applicable).

### 7.7 PERFORMANCE MANAGEMENT

#### 7.7.1 KEY PERFORMANCE INDICATORS

- Total Recordable Injury Frequency Rate (TRIFR).
- Significant Potential event (SPE) incident frequency.
- FRM critical-control verification compliance (% complete).
- Permit-to-Work non-conformance rates.
- Corrective action close out within defined timeframes.
- Leading indicators: safety interactions, toolbox attendance, training hours, and near-miss reporting.

#### 7.7.2 REPORTING & REVIEW

- HSE Weekly Reporting
  - Purpose: To provide consistent, high-quality weekly HSE performance information to the Client using the agreed project dashboard and to enable early intervention on trends.
  - Frequency: Weekly (reporting week Monday–Sunday).
  - Submission deadline: By 12:00 each Monday (or first working day thereafter) to the Contract Owner and Site HSE Manager (or delegate).
  - Format: The agreed HSE dashboard file (Excel) plus a short-written commentary (email/PDF) highlighting key outcomes, risks and actions. All supporting evidence (photos, registers, sign-in sheets, permits, inspection sheets) must be available on request.

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- Data quality: Figures must be complete, traceable to source registers and reviewed/approved by the Contractor’s Site Manager and Contractor HSE Officer prior to submission.

Dashboard alignment: KPI definitions, classification rules and calculation methods must match the agreed project HSE dashboard logic. Any proposed change to KPI definitions or formulas requires written approval by the Client.

- Minimum weekly reporting content (aligned to the project dashboard):
  - Workforce & exposure: Weekly headcount (employees + subcontractors), total manhours for the week, cumulative MTD/YTD/PTD manhours.
  - Leading indicators (weekly, MTD, YTD, PTD): Planned Task Observations / Safety Interactions, inspections, toolbox talks, pre-start meetings, FRM/critical control verifications completed, training conducted, JHAs completed, PTWs issued by type.
  - Hazards & Near Misses: Number reported and number closed (tracked separately), with short description of top recurring hazard themes and close-out status.
  - Incidents: All incidents by classification and category (e.g., property damage, environmental, first aid, medical treatment, restricted work, LTI, SPE), including date, location, brief description, immediate actions and status of investigation.
  - TRIFR calculation: Report TRIFR excluding First Aid Injuries (FAI) in line with the dashboard configuration; confirm the numerator/denominator used for the week and cumulative period.
  - Corrective actions: CAPA/Action register status (new actions raised, closed, overdue) including ICAM actions for recordable incidents/SPEs and FRM actions.
  - High-risk work summary: Any high-risk activities undertaken during the week (hot work, excavation, lifting, confined space, work at heights, electrical/LOTO) with confirmation that permits, JHAs and critical controls were applied.
  - Stop work events and escalations: Stop-work interventions, refusals to work, and management escalations (including positive recognitions).
  - Environmental & community: Spills, waste movements, dust/noise complaints, fauna/flora interactions (if applicable) and any environmental non-conformances.
  - Significant risks & forward look: Key risks for the next week, planned critical activities, required support/approvals, and lessons learned communicated.
- Monthly HSE Reports: Submitted to the Perseus HSE Manager, summarizing KPIs, incidents, audits, and FRM verifications.

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- **Quarterly Performance Reviews:** Conducted jointly between Perseus Contract Owner, Perseus HSE Manager, and contractor representatives.
- **Annual Review:** Used to evaluate contractor eligibility for future Perseus work.
- **Roles and responsibilities for weekly reporting:**
  - Contractor HSE Officer: Compiles the weekly dashboard data, validates against registers, and prepares the narrative summary.
  - Contractor Supervisor / Area Lead: Confirms manhours, work scope, leading indicator evidence and high-risk work controls for the reporting period.
  - Contractor Site Manager: Reviews and signs off the weekly report prior to submission and ensures corrective actions are resourced and closed.
  - Client Contract Owner / Site HSE: Reviews submission, provides feedback, and may request supporting evidence or conduct verification checks/audits.
  - Recordkeeping: Weekly reports and supporting records shall be retained in the Contractor HSE File / document control system for the duration of the contract and as required by Client retention rules.

**7.7.3 CORRECTIVE AND PREVENTATIVE ACTIONS**

- All non-conformances logged into the contractor HSE Action Register.
- Root-cause analysis performed for significant incidents or repeated trends.
- Corrective actions verified by the HSE team; effectiveness reviewed during audits (ref. Section 13 – Auditing and Evaluation Protocol).

**7.8 CONTRACT ADMINISTRATION AND FINANCE**

In addition to HSE and legal compliance requirements, contractors shall comply with contract administration and financial management requirements to support delivery of the contracted scope, schedule and commercial controls. These requirements are managed through the Contract Owner and Commercial Team in accordance with the Conditions of Contract and PMS governance requirements.

**7.8.1 CONTRACT ADMINISTRATION AND FINANCIAL MANAGEMENT REQUIREMENTS**

- Contract administration shall be undertaken in accordance with the Conditions of Contract, including agreed deliverables, notices, variation/claims management and required approvals.
- Contract Owners/Contract Administrators shall conduct regular checks against contract compliance (including scope, programme, deliverables and required management controls).

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- Contractors shall submit agreed progress information to support verification of total payments and the contract programme (including schedule updates where applicable).
- Regular weekly contract meetings and joint inspections shall be conducted (as applicable) to confirm progress, constraints, compliance and required actions; these may be integrated with site coordination and HSE meetings where appropriate.
- Interim payment applications shall be submitted with complete, accurate and auditable supporting documentation in the agreed format and timeframes.
- Where lump sum or milestone payments apply, progress measurement and payment triggers shall be clearly defined, tracked and agreed prior to payment certification.
- Procurement and logistics activities shall be coordinated to ensure timely delivery of materials and services, including alignment with site access controls, laydown arrangements and Local Content governance requirements where applicable.
- Contractors shall comply with applicable local regulations and project specifications relevant to their scope of work.
- Proper record keeping, approvals and reporting shall be maintained by all parties to support auditability and contractual governance.
- Compliance with PMS Mining requirements and project governance processes shall be maintained throughout the contract.

**7.8.2 COMMERCIAL REVIEW AND REPORTING**

- Commercial reviews shall be undertaken by the Contract Owner and Commercial Team at a frequency appropriate to the contract (minimum monthly unless otherwise agreed) to confirm budget status, commitments, variations/claims, procurement and schedule impacts.
- Any commercial non-conformance, disputes, or material deviations (scope/schedule/cost) shall be escalated through the project governance process with agreed actions, owners and due dates.
- Records of meetings, progress verification, payment certification and approvals shall be retained within the project contract file in line with document control and confidentiality requirements.

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## 8. LEGAL AND REGULATORY REQUIREMENTS (TANZANIA)

Requirement	Legal Basis	Obligation	Evidence
Workplace Registration	OHSA Act 2003 Sec. 16	Register and display OHSA certificate Provide evidence prior to mobilisation.	OHSA Certificate
Workers Compensation	WCF Act 2008	Register and submit levies	WCF Proof
Safety Policy & Risk Assessment	OHSA Sec. 60–61	Maintain site-specific policies	Approved Policy
Fire Safety	Fire and Rescue Act 2007	Maintain fire equipment and drills	Fire Report
Mining Safety	Mining Regs 2010	Adhere to mining OHS provisions	Inspection Report
Environmental Management	EMA 2004	Manage waste & emissions	NEMC Permit
Safety & Health Representatives / Committee	OHSA Act 2003 (Safety & Health Representatives / Committee provisions)	Designate Safety & Health Representative(s) where >20 employees; min ratio 1 per 50 employees (workplaces/factories) or 1 per 100 (shops/offices). Establish Safety & Health Committee where ≥2 representatives; meet at least quarterly; keep minutes and actions.	Appointment letters; training records; committee TOR; meeting minutes; action register.

## 9. CONTRACTOR OPERATIONAL SAFETY STANDARDS

All contractors must comply with the Perseus Fatality Risk Management (FRM) Program and implement the minimum control requirements of each applicable Perseus Fatal Risk Standard. These standards define the critical control measures necessary to prevent or mitigate fatal events associated with high-risk activities.

This CMP integrates the Perseus Fatality Risk Management (FRM) Program requirements as defined in PMS-HSE-STD-10263.

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**Note:** PML HSEC standards and associated compliance requirements may be revised from time to time. Where updates are issued, contractors shall review the changes and implement any necessary adjustments to systems of work, procedures, and controls within the required timeframe to maintain ongoing compliance.

### 9.1 WORKING AT HEIGHTS – PMS-HSE-STD-10131

- Use of certified fall-arrest and restraint systems; 100 % tie-off at height.
- Scaffolding and elevated work platforms erected/inspected by competent personnel.
- Edge protection, anchor points, and rescue plans in place prior to access.
- Weather conditions, exclusion zones, and drop-object controls verified daily.

### 9.2 CONFINED SPACE ENTRY – PMS-HSE-STD-10136

- Formal entry permit system with pre-entry atmospheric testing.
- Isolation of all energy sources and verification of zero-energy state.
- Continuous ventilation and standby watch required.
- Emergency retrieval plan, communication, and rescue equipment tested before entry.

### 9.3 ELECTRICAL SAFETY – PMS-HSE-STD-10137

- Only authorised and competent electricians to perform live testing or energised work.
- Mandatory Lock-Out / Tag-Out (LOTO) before maintenance or repair.
- Testing for dead before contact; insulated tools and PPE used.
- Residual Current Devices (RCDs) and earth leakage protection routinely verified.

### 9.4 CRANES AND LIFTING OPERATIONS – PMS-HSE-STD-10138

- Lift planning and risk assessment required for all non-routine lifts.
- Verification of rigging equipment certification and load-rating compliance.
- Exclusion zones and tag-line controls established.
- Competent lifting personnel (rigger, signaller, crane operator) to be appointed in writing.

### 9.5 ENERGY ISOLATION – PMS-HSE-STD-10139

- Isolation points identified, tagged, and locked by authorised persons.
- Verification of zero-energy prior to work commencement.
- Isolation registers maintained and cross-checked at shift change.

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- Stored energy (pressure, spring, hydraulic) safely released before work.

**9.6 VEHICLES AND DRIVING – PMS-HSE-STD-10140**

- Pre-start inspection, speed compliance, and seatbelt enforcement
- Journey management for travel beyond site limits
- Fatigue management procedures and rest breaks enforced.

**9.7 EXCAVATION AND PENETRATION – PMS-HSE-STD-10261**

- Service detection and permits before ground disturbance
- Benching, battering, or shoring for excavations > 1.2 m
- Barricades and signage to restrict access
- Daily inspections by a competent person for wall stability and water ingress.

**9.8 EXPLOSIVE MANAGEMENT – PMS-HSE-STD-10264**

- Handling by licensed shot-firers only; transport in authorised vehicles
- Secure magazines with segregation of detonators and explosives
- Blast exclusion zones, sirens, and visual warnings implemented
- Misfire and post-blast clearance protocols followed.

**9.9 HAND AND POWER TOOLS – PMS-HSE-STD-10273**

- Tools inspected before use; defective tools tagged “Out of Service.”
- Guards fitted and operational, use of correct tool for the task.
- Electrical tools connected through RCD protection.
- Operators trained and authorised; use of correct PPE (gloves, face shields, hearing).

**9.10 MANAGEMENT OF STORED ENERGY – PMS-HSE-STD-10133**

- Identification of mechanical, hydraulic, pneumatic, chemical, or gravitational energy.
- Pressure relief valves, chocks, or blocks installed before maintenance.
- Verification that all stored energy is isolated and dissipated.
- Competent supervision during re-energisation or testing.

**9.11 PERMIT TO WORK SYSTEM – PMS-HSE-STD-10132**

- A formalised permit process for all high-risk tasks: confined space, hot work, excavation, live electrical, working at height, or pressure testing.

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- Cross-reference of PTWs with isolation and FRM registers.
- Permit audits conducted weekly by the HSE Department.

### 9.12 PPE AND PERSONAL PROTECTION – PMS-HSE-STD-10197

- Mandatory minimum PPE: hard hat, safety boots, glasses, high-visibility clothing
- Task-specific PPE based on risk (respiratory, chemical, hearing, fall protection)
- PPE register maintained and verified for compliance with AU/ISO standards.

### 9.13 INCIDENT AND HAZARD REPORTING – PMS-HSE-STD-10198

- Immediate reporting of all incidents and near misses
- Recording in the site incident register within 24 hours
- Classification and escalation per severity; root-cause investigation using ICAM
- Communication of lessons learned to all personnel.

### 9.14 INTEGRATION WITH FRM AND AUDIT PROCESS

- Each of the above standards forms part of the Perseus Fatality Risk Management system.
- Contractors must conduct monthly verification of critical controls linked to these standards and participate in site FRM audits.
- Deviations or non-conformances must trigger review and corrective actions within the CMP audit framework.

### 9.15 MEDICAL FITNESS AND OCCUPATIONAL HEALTH MANAGEMENT

The contractor shall implement a structured medical fitness management program, covering the following:

Medical fitness compliance is a mobilisation gate requirement. Contractors shall ensure medical fitness evidence (medical examinations and/or fit-for-work declarations where applicable) is current prior to mobilisation and maintained for the duration of the contract. Records shall be held in a controlled manner with confidentiality protections and made available to PMS for verification on request.

#### 9.15.1 PRE-EMPLOYMENT MEDICAL EXAMINATION

- All personnel must undergo a pre-employment medical examination conducted by a registered Tanzanian medical practitioner accredited under the OHSA framework.
- Certificates of Fitness must clearly state that the individual is medically fit to perform the specific role or task (e.g., heavy equipment operator, rigger, blaster, driver).

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- The contractor shall maintain a Medical Fitness Register in the HSE File (Annex F).

#### 9.15.2 PERIODIC AND ONGOING MEDICAL SURVEILLANCE

- Workers exposed to noise, dust, vibration, chemicals, or confined spaces must undergo periodic medical surveillance at least annually, or more frequently where exposure risk warrants.
- Medical surveillance shall include audiometric testing, lung function, vision, and biological monitoring as appropriate.
- Records must be retained in accordance with OHS Act Section 61 and made available to Perseus HSE upon request.

#### 9.15.3 FIT FOR DUTY – FATIGUE MANAGEMENT (PML-HSE-STD-10342)

- Contractors shall implement a fatigue management plan based on a risk assessment of rosters, job demands, working environment and commuting arrangements.
- Maximum shift length shall not exceed 12 hours unless an approved extension is completed by the Supervisor and approved by the Department Manager prior to the extended hours commencing.
- Breaks shall be provided for all personnel; where shift length is  $\geq 10$  hours, total break time shall be no less than 60 minutes.
- Workers must present fit for duty; if fatigued during shift, STOP work in a safe area and notify supervision.

#### 9.15.4 DRUG AND ALCOHOL SCREENING (PML-HSE-STD-10343)

- Alcohol and illegal drugs are prohibited while working; employees must present fit for work free from impairment.
- Contractors shall comply with Perseus drug and alcohol screening requirements as stipulated in contract, including (as applicable) pre-placement testing, post-incident testing, reasonable suspicion testing, and random/blanket testing.
- Refusal to submit to, or attempts to avoid/adulterate, testing will result in removal from site and disciplinary/contractual action.
- Prescription medication must be declared to the site clinic (or medical provider) for evaluation and guidance prior to performing safety-critical work.

#### 9.15.5 EXIT MEDICAL EXAMINATION

- Exit medicals are mandatory for all personnel demobilized from site to assess any health deterioration related to project exposure.

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- Contractors must ensure exit certificates are filed as part of demobilization documentation.

#### 9.15.6 SITE MEDICAL SUPPORT AND FIRST AID

- The contractor shall maintain first-aid kits and train first aiders in accordance with OHS Section 53 and Regulation 341 of the Mining Regulations (2010).
- All injuries and treatments shall be recorded in a First-Aid Register, which forms part of the Contractor HSE File.
- Emergency medical response should align with the Nyanzaga Emergency Response Plan (ERP) and Perseus corporate protocols.

## 10. ENVIRONMENTAL MANAGEMENT

### 10.1 CONTRACTOR ENVIRONMENTAL RESPONSIBILITIES

Contractors shall: -

- Prepare and submit a project-specific Environmental Management Plan (EMP) for review and approval prior to mobilisation, ensuring alignment with PML's overarching EMP.
- Implement environmental management procedures covering all work activities, including but not limited to waste, water, fuel, oil, chemical, and land management.
- Nominate a competent Environmental Representative responsible for compliance and liaison with the PML Environmental Department.
- Ensure all personnel receive environmental induction and ongoing awareness training.
- Fully cooperate with PML environmental inspections, audits, and monitoring programs.

### 10.2 ENVIRONMENTAL DOCUMENTATION

Contractors must provide the following documentation prior to site mobilisation:

- Company Environmental Management Plan (EMP) covering all project activities.
- Updated Environmental Policy demonstrating commitment to protection and sustainability.
- List of chemicals and quantities anticipated for use, including corresponding Material Safety Data Sheets (MSDS); and
- Evidence of environmental training or awareness provided to employees

### 10.3 INCIDENT AND HAZARD REPORTING

- All environmental incidents, near misses, or non-conformances shall be reported immediately to the PMS Environmental Department.

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- A **Flash Report** must be submitted within **24 hours**, followed by a detailed investigation report within 72 hours.
- Contractors shall participate in incident investigations and corrective action implementation

#### 10.4 SPILL PREVENTION AND RESPONSE

- Spill kits must be available at all areas where fuel, oil, or chemicals are stored or used.
- Personnel shall be trained in spill prevention, containment, and clean-up procedures.
- Any spill, regardless of size, must be reported to the PMS Environmental Department.
- Contaminated materials shall be collected, contained, and disposed of at approved waste facilities

#### 10.5 LAND CLEARANCE AND VEGETATION MANAGEMENT

- No land or vegetation clearing shall be undertaken without a **Permit to Clear (LCP)** issued by the PML Environmental Department.
- Disturbance must be minimised to the approved work area only.
- Sensitive areas and habitats must be demarcated and protected from encroachment

#### 10.6 WILDLIFE PROTECTION

- The killing, capturing, or harassment of wildlife is **strictly prohibited**.
- All wildlife sightings must be reported immediately to the PML Environmental Department.
- No hunting, trapping, or keeping of animals is permitted on-site

#### 10.7 WATER RESOURCE PROTECTION

- Contractors must ensure no pollution or contamination of nearby streams, rivers, wells, or ponds.
- Wastewater, fuel, and chemicals shall be managed to prevent leaks, runoff, or groundwater seepage.
- Temporary sediment traps or bunding must be installed in high-risk areas

#### 10.8 CHEMICAL MANAGEMENT

- Submit a complete **Chemical Register** before mobilisation, including all substances to be used on site.
- Provide MSDS for each chemical and ensure proper labelling, storage, and handling.

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- Store chemicals in contained areas with impervious flooring and secondary containment

## 10.9 WASTE MANAGEMENT

- All waste shall be collected, segregated, and disposed of only at designated sites approved by PMS.
- Waste bins shall be provided at work areas and emptied regularly.
- Recyclable and hazardous wastes must be clearly labelled and separated.
- Burning or unauthorised disposal of waste is prohibited

## 10.10 ENVIRONMENTAL INDUCTION AND TRAINING

- All Contractor employees must attend the **PMS Environmental Induction** before starting work.
- Ongoing toolbox talks and refresher sessions shall reinforce environmental awareness.
- Records of attendance must be kept in the **Contractor HSE File (Annex G)**

## 10.11 MONITORING & AUDITING

- Contractors shall conduct regular internal environmental inspections.
- PML may perform joint environmental audits and spot inspections at any time.
- Non-conformances shall be recorded in the **Corrective and Preventive Action Register (CAPA)** and addressed promptly.
- Repeat or major non-compliance may result in work suspension or contract termination

## 10.12 ENVIRONMENTAL PERFORMANCE REPORTING

- Contractors must submit monthly Environmental Performance Reports, including:
  - Waste volumes generated and disposed.
  - Spill or incident statistics.
  - Environmental training conducted.
  - Audit findings and corrective actions.
- Reports are to be submitted to the PMS Environmental Department within the first week of the following month.

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## 11. COMMUNICATION AND CONSULTATION

### 11.1 COMMUNICATION CHANNELS

This CMP aligns to the Perseus Health, Safety and Wellbeing Policy (PML-HSE-POL-10186) including visible leadership, consultation and engagement, stop-work authority without fear of retribution, and compliance with applicable laws and standards.

Contractor leaders are accountable for HSE performance and must promote both physical and psychological safety.

Competencies will be verified regularly; emergency response provisions will be maintained and tested; performance will be monitored through audits, reviews and corrective actions.

#### 11.1.1 DAILY COMMUNICATIONS

- Pre-start / Toolbox Talks: Conducted by each contractor supervisor before commencement of daily tasks.
- Focus on task hazards, critical controls (FRM), and environmental aspects.
- Delivered in English and Kiswahili to ensure comprehension.
- Shift Handovers: Include safety status, outstanding permits, isolations, and incidents.
- Safety Notice Boards: Updated daily with bulletins, FRM verifications, weather alerts, and PPE notices.

#### 11.1.2 WEEKLY COMMUNICATIONS

- Contractor Coordination Meetings: Chaired by the site HSE Manager to review incidents, near misses, and FRM verifications.
- Management Walkabouts (Visible Leadership): Cross-functional walkabouts involving Perseus management, contractor supervisors, and workforce representatives.
- Safety Committee Meetings: Representation from Perseus and all active contractors to review KPIs, legal changes, and improvement actions.

#### 11.1.3 MONTHLY COMMUNICATION

- HSE Performance Review: Contractors submit monthly HSE reports summarizing leading and lagging indicators, audits, and FRM findings.
- Joint HSE Steering Committee: Discuss strategic issues, regulatory updates, and project-wide HSE initiatives.
- Lessons-Learned Workshops: Facilitate discussion of high-potential events and near misses for shared learning.

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## 11.2 CONSULTATION MECHANISMS

### 11.2.1 WORKER REPRESENTATION

- Contractors shall appoint employee safety representatives as per Tanzanian OHSA 2003 Sections 75–76.
- Representatives participate in inspections, investigations, and committee reviews.

### 11.2.2 TANZANIAN LEGAL MINIMUM REQUIREMENTS (OCCUPATIONAL SAFETY AND HEALTH ACT, 2003)

- Where the workplace has more than 20 employees, the Contractor (as employer) shall designate Safety & Health Representative(s).
- Minimum ratio (workplaces/factories): at least 1 Safety & Health Representative for every 50 employees (or part thereof).
- Minimum ratio (shops/offices): at least 1 Safety & Health Representative for every 100 employees (or part thereof).
- Where two or more Safety & Health Representatives are designated, a Safety & Health Committee shall be established.
- The Safety & Health Committee shall meet at least once every three (3) months; minutes and actions shall be recorded and tracked to close-out.
- Where practicable, committee representation should include women (minimum one-third of committee membership).

### 11.2.3 FEEDBACK SYSTEMS

- Safety suggestion boxes and open-door reporting systems are available on site.
- All feedback tracked in the site HSE action register, with close-out recorded.

### 11.2.4 CONTRACTOR LIAISON OFFICERS

- Each major contractor designates a liaison responsible for communication with Perseus HSE management and participation in weekly forums.

## 11.3 LANGUAGE AND CULTURAL CONSIDERATIONS

- Communication must be **clear, concise, and culturally appropriate**, reflecting Tanzania’s bilingual workforce.
- Critical safety messages and signage are issued in both **English and Kiswahili**.
- Visual aids (pictograms, FRM icons) are used for high-risk topics to ensure comprehension among all literacy levels.

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## 11.4 EMERGENCY AND CRITICAL COMMUNICATION

- Emergency communication channels are tested monthly (radios, sirens, muster alarms).
- Incident notifications follow the **PMS-HSE-STD-10198 Incident and Hazard Reporting** procedure:
  - Verbal notification immediately to the Perseus HSE team.
  - Written report within 24 hours.
  - Regulatory notification to **OHSA Tanzania** where required.
- All emergency contact lists are maintained at work fronts, permit stations, and site security gates.

## 11.5 DOCUMENTATION AND RECORDKEEPING

- Meeting minutes, toolbox attendance, and safety briefings are documented and filed within the **Contractor HSE File (Annex G)**.
- Communication records are auditable and retained for the life of the contract.
- The Contractor HSE Manager verifies communication effectiveness during audits (ref. Section 13 – Auditing and Evaluation Protocol).

## 11.6 CONTINUOUS IMPROVEMENT IN COMMUNICATIONS

- Post-incident reviews and FRM verifications include communication-effectiveness evaluation.
- Feedback trends are analysed quarterly to identify recurring communication barriers.
- Corrective and preventive actions are implemented under the Continuous Improvement process (Section 12).

# 12. INCIDENT AND NON-CONFORMANCE MANAGEMENT

## 12.1 REPORTING REQUIREMENTS

### 12.1.1 IMMEDIATE VERBAL NOTIFICATION

- All serious incidents, fatalities, or near misses with potential for significant harm must be reported immediately to the Perseus HSE Manager and site emergency contacts.

### 12.1.2 WRITTEN NOTIFICATION

- A preliminary incident report must be submitted within 24 hours of occurrence using the Perseus Incident and Hazard Reporting Form (PML-HSE-STD-10198).
- All incidents (including hazards and near misses) shall be recorded within 24 hours in the site incident register/database in accordance with PML-HSE-STD-10198.

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- An Incident Alert email notification shall be issued within 24 hours using the Incident Alert form; SPE and Total Recordable Injury notifications are escalated in line with Perseus requirements.
- Regulatory notification to the Occupational Health and Safety Authority (OHSA) or relevant Mining Inspectorate must occur within statutory timeframes.

### 12.1.3 CONTRACTOR RESPONSIBILITIES

- Each contractor should maintain an internal reporting system consistent with this standard and integrate reports into the Perseus Incident Register.

## 12.2 INCIDENT CLASSIFICATION

All incidents are classified based on **severity** and **actual or potential consequence** to determine the appropriate investigation level and reporting pathway:-

Classification shall align to PML-HSE-STD-10201 definitions (e.g., FAI, MTI, RWI, LTI, FI, TRI) and include identification of Significant Potential Events (SPE) where the credible maximum consequence could include fatality or permanent disability.

The Site HSE Manager (or equivalent) is accountable for incident classification, with final review completed in accordance with Perseus governance (including escalation where required).

Class	Description	Investigation Lead	Notification Requirement
Class 1	High-potential or fatality	Perseus GM HSEC / Site HSE Manager	Immediate to OHSA, client, and corporate
Class 2	Serious injury / property loss	Site HSE Manager	Within 24 hours
Class 3	Medical treatment / minor damage	Contractor HSE / Supervisor	Within 48 hours
Class 4	First-aid / near miss	Line Supervisor	Record in daily log

## 12.3 INVESTIGATION PROCESS

Incident Investigation Methodology – ICAM (PML-HSE-SOP-10259):

- Investigations shall establish facts, identify contributing factors and latent hazards, review adequacy of controls and recommend corrective actions to prevent recurrence, using ICAM.
- Data collection shall consider People, Environment, Equipment, Procedures and Organisation factors; interviews should be conducted to prevent recurrence and not to apportion blame.

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- Findings should be organised using an Event and Condition Chart prior to analysis and transfer to an ICAM chart.
- Investigations must consider roster/fatigue, training/competence, supervision, communications and environmental conditions at the time of the incident.

Incident investigations shall commence as soon as possible after the incident.

Fatality investigations are sponsored in accordance with Perseus requirements; the COO appoints the investigation team where applicable.

SPE and recordable injury investigations shall use ICAM methodology and be completed within 14 days where possible; all other incidents should be completed within 21 days.

### 12.3.1 LEAD INVESTIGATION

- All Class 1 and Class 2 incidents investigated using the ICAM (Incident Cause Analysis Method) or equivalent root-cause tool.
- Contractor and Perseus HSE personnel shall participate jointly.

### 12.3.2 EVIDENCE COLLECTION

- Statements, photographs, permits, JHAs, and FRM verifications collected to determine control effectiveness.

### 12.3.3 ROOT-CAUSE ANALYSIS

- Identify underlying causes (technical, organisational, human, environmental).
- Validate whether critical controls failed or were absent.

### 12.3.4 CORRECTIVE ACTION PLAN

- Actions developed to prevent recurrence, assigned responsibilities, and completion timeframes.

## 12.4 NON-CONFORMANCE MANAGEMENT

- All procedural or behavioral deviations identified through inspections, audits, or observations must be logged in the HSE Action Register.
- Non-conformances categorized as:
  - **Major:** Immediate risk to health, safety, or environment.
  - **Minor:** Administrative or procedural deficiency.
- Contractors must implement corrective actions within agreed timeframes and provide verification evidence.

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- Persistent non-conformances may result in escalation, suspension, or removal from site.

## 12.5 COMMUNICATION AND LEARNING

- **Incident Alerts:** Issued for all Class 1 and 2 events and distributed to all site contractors within 48 hours.
- **Toolbox Briefings:** Incident summaries discussed during daily pre-starts to reinforce learning.
- **Lessons Learned Workshops:** Facilitated monthly to review trends and FRM critical-control failures.
- **Cross-Site Sharing:** High-potential incidents shared across all Perseus operations for corporate learning.

## 12.6 RECORDS AND MONITORING

- All reports, investigations, and close-out evidence stored in the Contractor HSE File (Annex G).
- The Perseus HSE Department maintains the Incident Register to monitor trends, root causes, and control failures.
- Periodic statistical analysis conducted to identify recurring risks, driving targeted improvement programs.

## 12.7 CONTINUAL IMPROVEMENT

- Results from incident investigations and non-conformance reviews feed into the **Management Review process** (Ref. Section 13).
- Findings drive updates to procedures, risk assessments, and FRM verification processes.
- Performance feedback provided during monthly contractor HSE meetings to ensure lessons are embedded across teams.

# 13. AUDITING AND EVALUATION PROTOCOL

## 13.1 AUDIT FRAMEWORK

Contractor Auditing within the Nyanzaga Project follows a structured three-tier system designed to cover all HSE

Audit Type	Frequency	Conducted By	Purpose / Scope
Tier 1 – Internal / Self-Audit	Weekly / Monthly	Contractor HSE Team	Assess compliance with contractor HSE Plan, risk assessments, PTWs,

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			FRM verification, and housekeeping standards.
<b>Tier 2 – Joint Site Audit</b>	Monthly	Perseus HSE Representative + Contractor Rep	Verify compliance with Perseus Standards, critical control implementation, and statutory requirements.
<b>Tier 3 – Corporate or External Audit</b>	Quarterly / Annually	Perseus HSEC Dept / Independent Auditor / Client	Validate ISO 45001 system conformance, FRM maturity, and overall contractor governance performance.

All audits follow the Perseus Corporate HSEC Audit Protocol and are aligned with the PMS-HSE-STD-10333 Contractor HSE Management and PML-OHS-STD-001 HSEC Standard.

### 13.2 LEGAL COMPLIANCE VERIFICATION

- Conducted quarterly against relevant Tanzanian legal frameworks, including:
  - Occupational Health and Safety Act (2003)
  - Workers Compensation Fund Act (2008)
  - Mining (Safety, Occupational Health and Environmental Protection) Regulations (2010)
  - Environmental Management Act (2004)
  - Fire and Rescue Services Act (2007)
- Each audit uses a **Legal Compliance Checklist**, recording clause references, level of compliance, evidence, and required actions.
- Any gaps identified must be captured in the **HSE Action Register** and addressed within 30 days.

### 13.3 FATALITY RISK MANAGEMENT AND CRITICAL CONTROL VERIFICATION

- Monthly FRM audits are conducted to verify implementation of controls associated with each Fatal Risk Standard (refer Section 9) and the FRM Program requirements (PMS-HSE-STD-10263).
- Critical controls tested in the field and validated through supervisor interviews, permit checks, and visual inspections.
- Findings reported to the **Perseus HSE Manager** and summarized in the monthly FRM verification report.
- Non-functional controls or repeated deviations trigger an **Issue-Based Risk Assessment** and immediate management review.

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### 13.4 CONTRACTOR AUDIT PROGRAM

Each contractor shall develop and maintain a **Contractor Audit Schedule** that aligns with the Perseus audit calendar. Minimum requirements: -

- Internal inspections at least monthly, covering PTW, housekeeping, emergency equipment, and legal registers.
- Participation in joint Perseus audits when requested.
- Immediate submission of audit reports to the site HSE department.
- Evidence of corrective-action close-out tracked and verified by Perseus.

### 13.5 AUDIT PROCESS

Audits shall follow a consistent and transparent process: -

- Planning – Define scope, objectives, and checklist aligned to relevant standards and project phase.
- Execution – Conduct site inspections, interviews, and document reviews.
- Reporting – Document findings, classify observations (compliance, improvement, non-conformance).
- Corrective Action – Assign actions, responsible persons, and deadlines.
- Verification – Confirm completion and effectiveness of corrective actions.
- Close-Out – Record in the HSE Action Register and report outcomes to management.

### 13.6 NON-CONFORMANCE AND FOLLOW UP

- All audit findings are logged in the **HSE Action Register** with unique identifiers and due dates.
- **Major findings** require close-out verification by Perseus HSE within 14 days.
- **Minor findings** closed out internally by the contractor within 30 days.
- Persistent or systemic non-conformance triggers escalation to the **Contract Owner** and may affect contractor pre-qualification status.

### 13.7 PERFORMANCE REVIEW AND REPORTING

- Audit outcomes reviewed during monthly contractor coordination meetings and quarterly HSE Steering Committees.
- Summaries and trend analyses reported to Perseus management and included in corporate HSEC reviews.

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- Lessons learned from audits shared across Perseus operations to strengthen FRM maturity and standardization.

### 13.8 CONTINUAL IMPROVEMENT

- Audit data is used to identify improvement opportunities, training needs, and system-design enhancements.
- Improvement initiatives prioritized based on risk ranking and incorporated into the **Annual HSE Improvement Plan**.
- The effectiveness of improvements is validated through follow-up audits and management review (refer Section 13).

## 14. RECORD KEEPING AND DOCUMENT CONTROL

### 14.1 DOCUMENT CONTROL PRINCIPLES

All documents and records shall be managed in accordance with *PMS-COR-STD-001 Document Control Standard* and *ISO 45001:2018 Clause 7.5*, ensuring the following:

#### 14.1.1 IDENTIFICATION

- Each document shall bear a unique title, number, and revision identifier.
- Controlled documents shall reference the applicable standard or procedure number (e.g., PMS-HSE-STD-10132).

#### 14.1.2 APPROVAL AND ISSUE

- Documents must be reviewed and approved by authorized personnel prior to issue.
- Only the latest approved versions shall be used at the workplace.
- Contractors shall submit documents for approval by PMS prior to mobilization, or when revisions are made.

#### 14.1.3 DISTRIBUTION AND ACCESSIBILITY

- Controlled copies of approved documents shall be accessible to all relevant personnel (digital or hard copy).
- Superseded or obsolete documents must be removed from points of use and clearly marked "Superseded."
- Electronic distribution shall be managed via PMS's secure document control system or designated shared drive.

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**14.1.4 REVISION CONTROL**

- Revisions shall be recorded with a summary of changes and date of approval.
- Revisions of contractor documents must be resubmitted to PMS for review and acceptance before implementation.

**14.2 RECORD KEEPING REQUIREMENTS**

**14.2.1 CONTRACTOR RESPONSIBILITIES**

Contractors are responsible for:-

- Maintaining complete and current records within their **Contractor HSE File (Annex G)**.
- The Contractor HSE File shall include copies of, or clear references/links to, all required regulatory approvals and statutory registrations applicable to the contractor’s scope of work, sufficient to demonstrate compliance during internal/external audits and regulatory inspections.
- Where applicable, the Contractor HSE File shall also include evidence of Local Content compliance confirmation/approval (as required by Tanzanian mining regulations and project governance).
- Local Content compliance is managed through **Supply Chain governance processes**; however, evidence of confirmation (e.g., approval reference, correspondence, registration/validation record, or contract approval note) shall be retained/linked in the Contractor HSE File to support **auditability and regulatory review**.

HR-related onboarding records (including screening confirmations, personnel records/declarations and statutory payment evidence where required) shall be stored as controlled softcopy records with appropriate confidentiality controls. Monthly contractor headcount and workforce information shall be maintained and made available to PMS on request.

- Ensuring records are legible, signed, and dated where applicable.
- Storing records in a secure and orderly manner (physical or digital).
- Submitting copies of critical HSE records (e.g., incidents, audits, risk assessments, training records) to the PMS HSE Department monthly or upon request; and
- Retaining records for a minimum of five (5) years after project completion unless otherwise specified by legislation or contract.

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### 14.2.2 PMS (CLIENT) RESPONSIBILITIES

Perseus Mining Sotta Limited shall: -

- Maintain a master record register of all controlled documents received from Contractors.
- Ensure records are stored and backed up in accordance with PMS-COR-STD-001.
- Retain key HSE and legal compliance records for the life of the project and subsequent statutory period.
- Conduct periodic audits of Contractor documentation to verify completeness and control; and
- Control issue and revision of all Company-managed procedures, forms, and standards relevant to Contractor operations.

### 14.3 RECORD TYPES AND RETENTION PERIODS

Record Type	Retention Period	Responsible Party
Risk Assessments, JHAs, PTWs	2 years after work completion	Contractor
Training and Induction Records	Duration of employment + 5 years	Contractor
Medical Records and Surveillance	Duration of employment + 30 years (OHSA 2003 Sec. 61)	Contractor / PMS
Incident and Investigation Reports	Life of project + 5 years	PMS HSE
Audit and Inspection Reports	Life of project + 2 years	PMS / Contractor
Meeting Minutes and Communication Records	Life of project	Contractor / PMS
HSE Statistical Reports and KPIs	Life of project	Contractor / PMS
Legal Compliance Certificates and Registrations	Life of project	Contractor
Final Project Close-Out and HSE File	Minimum 5 years post-project	Contractor / PMS

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## 15. COMPLIANCE AND ENFORCEMENT

- Contractors must comply with all relevant Tanzanian legislation, PML policies, and this CMP.
- Disciplinary and consequence management interface
  - Contractor disciplinary matters remain the responsibility of the contractor’s management processes and shall be handled in accordance with applicable Tanzanian labour law and the contractor’s internal disciplinary code, while meeting PMS site rules and behavioral expectations.
  - Where misconduct, serious breaches, or repeated non-compliance has the potential to impact safety, security, legal compliance, or community relations, the contractor shall notify the Contract Owner and PMS HSE/Management as applicable and provide a summary report of the incident and actions taken.
  - PMS reserves the right to apply site access controls (including suspension or removal from site) where serious misconduct, safety breaches, or non-compliance is identified, in accordance with contract terms and site rules.
- Failure to comply may result in penalties, suspension of work, or contract termination.
- PMS reserves the right to conduct HSE compliance reviews and demand corrective action where required

## 16. ANNEXURES

The scope of work and tender documentation shall define HSE requirements (including statutory and Perseus standards) for the contracted activities.

Pre-qualification shall assess the contractor’s ability to meet Perseus HSE requirements prior to award.

Onboarding shall be completed by the Contract Owner/Administrator using the onboarding checklist (Annex A) and the gated onboarding workflow (Annexure E: Onboarding Process Flow) and must be signed off by the Contract Owner/Administrator (Owner) and the HSE Department before work starts.

- Annex A: Contractor Pre-Qualification Checklist
- Annex B: Site Induction & Competency Register
- Annex C: Compliance Audit Template
- Annex D: Critical Control Verification (FRM) Sheet
- Annex E: Onboarding Process Flow
- Annex F: JHA Forms

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NYANZAGA GOLD PROJECT CONTRACTOR MANAGEMENT PLAN  
INTEGRATED GOVERNANCE SYSTEM



- Annex G (a): Contractor HSE File Index – Long Term
- Annex G (b): Contractor HSE File Index – Short Term, Service, Consultants
- Annex H (a) : Contractor Management Deliverable Register- Long Term Contractor
- Annex H (b) : Contractor Management Deliverable Register- Short Term Contractor

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