



14 January 2022

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United Nations Human Rights Special Procedures

Special Rapporteurs, Independent Experts & Working Groups

Palais des Nations

1222 Geneva 10, Switzerland

Attention: Beatrice Balbin, Chief, Special Procedures Branch, OHCHR
Jose Francisco Cali Tzay, Special Rapporteur
Surya Deva, Chair-Rapporteur of the Working Group
David R. Boyd, Special Rapporteur

**RE: Letter dated 17 November 2021 to Jay Park QC, Chairman and Scot Evans, CEO,
Reconnaissance Energy Africa Ltd.—Ref AL OTH 252/2021**

Reconnaissance Energy Africa Ltd. (*ReconAfrica*) is pleased to have received your letter of 17 November 2021 (*OHCHR Letter*) sent to us in your capacities as Chairman-Rapporteur and Special Rapporteurs pursuant to Human Rights Council resolutions 44/15, 46/7 and 42/20.

We note that you have sent the OHCHR Letter to seek clarification on information that you have received regarding the impacts of oil and gas activities being conducted by ReconAfrica's locally registered subsidiaries and joint ventures in Namibia and Botswana. It is our pleasure to provide the requested clarification in this response to the OHCHR Letter.

The OHCHR Letter contains:

- An expression of concern regarding the alleged impacts of oil and gas exploration and extraction on the lands of the San indigenous peoples in Namibia and Botswana (***'Expression of Concern'***)
- A section of 'information received' regarding ReconAfrica's activities in Namibia and Botswana (***'Information Received'***)
- A request for ReconAfrica's observations on nine items listed in the OHCHR Letter (***'Request for Observations'***)

This response will address each of the above topics.

To begin our commentary, we feel it important to point out that key items in the Information Received misstate basic facts about the nature and scope operations of ReconAfrica and its

subsidiaries in Namibia and Botswana and the current state of those operations. For example, on page 2 of the OHCHR Letter, in the Information Received section, it states,

*"Your company... was granted **25-year petroleum exploration licenses** (License No. 73 in Namibia) over 34,000 km/8.4 million acres of lands traditionally used and occupied by the San peoples in Namibia and Botswana. **ReconAfrica owns 90 percent of the Namibian side of the deposit**, with the government-run National Petroleum Corporation of Namibia owning the remaining 10 percent." [emphasis added]*

ReconAfrica does not have any 25-year licences. Licences having such long terms are exclusively associated with the production of petroleum, in Namibia, Botswana and most other jurisdictions where petroleum operations are conducted. Production licences are awarded only after discoveries of commercial quantities of oil and gas occur during an exploration licence, and following an application, engagement and approval process involving an environmental impact assessment, environmental management plan and development plan.

ReconAfrica is conducting exploration activities under a work commitment to the governments of Namibia and Botswana, with a goal of finding commercial quantities of oil and gas pursuant to exploration licences in those countries. ReconAfrica does not 'own 90 percent... of the deposit'. We have licences allowing only exploration activities to establish whether commercial reservoirs (or 'deposits') are present.

Also, at page 2 of the Information Received section, it states,

"it is moving to the next phase of the exploration process; acquisition, and processing with the goal of commercializing this potential major source of energy for Namibia."

In this case, the ellipsis conjoins separate sentences from a ReconAfrica press release. The accurate completion of the sentence where the ellipsis is shown is as follows:

*"it is moving to the next phase of the exploration process; acquisition, processing, and interpretation of **the first regional seismic grid** in this newly identified sedimentary basin." [emphasis added]*

Accordingly, the Information Received section of the OHCHR Letter (which may have been material provided to you by others) appears to us to have misrepresented, by misstatement and omission, the nature of ReconAfrica's rights and our activities. In Namibia, we are conducting seismic surveys and drilling stratigraphic test wells. In Botswana, we are in the pre-engagement and pre-approval planning stages of seismic surveys and stratigraphic test well drilling.

These fundamental misstatements in the Information Received seem to have resulted in an Expression of Concern that is unwarranted in the circumstances. In particular, ReconAfrica is working with and listening to potentially affected stakeholders. The scope of ReconAfrica's

operations is confined to very small geographic areas, and in those areas, there is no evidence that any of the implied damage has occurred – i.e., no contamination, no displacement of persons or villages, no harm to food or water supplies, and no disruption of animal migration routes or habitats. Therefore, we believe that an essential part of our response to the OHCHR Letter is the following accurate description of ReconAfrica’s petroleum exploration licences, the status of the activities that we are conducting in Namibia and Botswana pursuant to these licences, the regulatory and engagement processes that are associated with petroleum operations at the exploration phase, and then a description of the regulatory and engagement processes that apply when commercial reservoirs of oil and gas are discovered in countries such as Namibia and Botswana, who operate modern petroleum regimes designed to protect the interests of stakeholders including local citizens.

The Petroleum Exploration, Development and Production Process

The following describes a typical process for exploration, development and production of oil and gas under the petroleum regimes of most countries, including Namibia and Botswana.

1. An explorer identifies a potentially prospective area based on available existing data.
2. The explorer negotiates a grant of exploration rights to the area from the relevant government.
3. The explorer gathers more existing data and may acquire new data such as aeromagnetic and gravity surveys, and then interprets such data. Gathering this data does not require physical operations on the surface in the area. These activities help to define the type of additional exploration operations that should be conducted.
4. If the area seems prospective, the explorer will seek regulatory approval for the conduct of seismic surveys and/or exploration drilling. Typically, such approvals require the conduct of an environmental impact assessment and stakeholder engagement.
5. Following approval, the exploration activity occurs.
 - a. In the case of seismic surveys, these involve the acquisition of seismic data by means of an impulse source and seismic sensors.
 - b. In the case of exploration drilling, this involves a drilling rig to drill a vertical hole to a target depth, possibly extract sample core of subsurface rock, and conduct wireline logging. Production of oil and gas is not involved.
6. Additional exploration drilling and further seismic surveys may occur during the exploration period.
7. If the drilling exploration activities result in the identification of a possibly commercial reservoir of oil and gas, further ‘appraisal’ drilling typically occurs, possibly in combination with additional seismic surveys, to determine the extent of the reservoir and allow for the planning of a commercial development. Production of oil and gas is not involved at this stage.

8. If the appraisal operations confirm the presence of a commercial reservoir of oil and gas, the explorer may apply for the right to produce oil and gas. This typically requires a 'development plan', which will include an environmental impact assessment, and an environmental management plan. Stakeholder engagement is required as part of the transition from the exploration phase to the production phase of oil and gas operations.
9. If the production rights are approved, the explorer proceeds to develop the commercial reservoir by the drilling of production wells and installing other production equipment. This may include commencing production from one or more of the exploration or appraisal wells, following re-entry and completion of them.
10. After development of the reservoir is completed, production commences and continues for the productive life of the reservoir or until the production licence terminates.
11. When production ends, the wells and other facilities will be removed and any affected areas will be reclaimed pursuant to a closure plan developed as part of the Environmental Impact Assessment submitted in connection with a production licence application.

It should be noted that the activity approvals and related stakeholder engagement occur separately at exploration and production stages, and only in respect of the activities anticipated at each stage. This sensible approach is adopted because during the exploration stage, it is not known whether commercial resources will be discovered, the type of hydrocarbons (oil or gas) that are present, and what type of gathering, processing and transportation facilities may be required. It is only possible to know the development activities, facilities and impacts after commercial resources are discovered and a development plan is established.

ReconAfrica in Namibia

Through its local affiliate Reconnaissance Energy Namibia (Pty) Ltd. (*REN*), ReconAfrica entered into a Petroleum Agreement dated January 2015 with the Namibia Ministry of Mines and Energy (*MME*) pursuant to which Petroleum Exploration Licence PEL 73 was granted to REN as to 90% and National Petroleum Corporation of Namibia (*NAMCOR*) as to 10%. PEL 73 is in its First Renewal Period, which ends January 29, 2023. REN and NAMCOR have the right to request an additional two-year Second Renewal Period. There are also discretionary extension rights available under Namibia's *Petroleum (Exploration and Development) Act No. 2 of 1991* which can add a few more years to the exploration phase upon the approval of MME.

During the First Renewal Period of PEL 73, REN and NAMCOR are required to conduct a minimum work obligation which includes the drilling of two stratigraphic test wells and the acquisition of 250 km of 2D seismic data, and spending at least US\$10 million on exploration activities. These minimum work obligations have been exceeded. The Kawe 6-2 well and the Mbambi 6-1 well were finished in April and July 2021 respectively. A ~450-km 2D seismic survey commenced in July 2021 and was completed in October. The seismic data is currently



being processed, interpreted and evaluated for the purpose of selecting future drilling locations.

In order to conduct the drilling of the stratigraphic test wells, REN commenced its environmental impact assessment (EIA) and related public consultations in September 2018. Following these consultations, the EIA and a related environmental management plan were submitted in June 2019. An environmental clearance certificate (ECC) for the drilling of multiple stratigraphic test wells was granted on 26 August 2019.

The stratigraphic test wells involve the clearing of a drillsite area of approximately 200 meters by 200 meters. No commercial production of oil or gas occurs as part of the stratigraphic well drilling.

In order to conduct the seismic survey, REN completed a seismic EIA and related public consultations in 2020 and 2021. Following these consultations, the EIA and a related environmental management plan were submitted in March 2021. An ECC to conduct a ~450 km 2D seismic survey in PEL 73 was granted on the 2 July 2021.

The first 450 km phase of the seismic survey involved lightweight, low-frequency equipment and operated only in the daytime. ReconAfrica is currently interpreting and evaluating the results of the seismic survey before selecting additional well locations for the drilling of exploration wells in early 2022.

The current state of REN's exploration activities on PEL 73 is equivalent to the fifth paragraph in *Petroleum Exploration, Development and Production Process* section above. REN has not yet made a discovery of a commercial reservoir of oil and gas in Namibia, and accordingly has not commenced the regulatory approval process or stakeholder engagement that would be associated with development and production operations in Namibia.

ReconAfrica in Botswana

Through its local affiliate Reconnaissance Energy Botswana (Pty) Ltd. (REB), ReconAfrica was granted Exploration Licence 001/2020 (EL 001/2020) in June 2020 by the Botswana Ministry of Mineral Resources, Green Technology and Energy Security (MMGE). EL 001/2020 is in its initial phase which ends June 2024. Additional phases may be requested by REB upon request to MMGE.

The current state of REB's exploration activities on EL 001/2020 is equivalent to the third paragraph in *Petroleum Exploration, Development and Production Process* section above. REB is assessing the type of exploration activities that it plans to conduct in the Botswana licensed area. It will soon be opening an office in Gaborone. REB is hiring its first Botswana-resident employees. We conducted meetings in Shakawe in May 2021 to introduce REB to government and local stakeholders. Discussions have been initiated in September, October and November 2021 with Botswana ministries whose involvement will need to be part of REB's exploration

activities in Botswana. REB is currently identifying the consultants who can assist it in the conduct of an environmental impact assessment and related stakeholder engagement in Botswana.

It is important to stress here that *REB has not commenced regulatory EIA stakeholder engagement in Botswana*, nor is it appropriate or timely to do so until a plan for exploration activities in Botswana has been defined. ReconAfrica will adhere to our commitments to the government of Botswana. The work program applicable to EL 001/2020 requires that an environmental impact assessment be commenced during the third licence year, beginning June 2022. In Namibia, PEL 73 was granted in January 2015 and the EIA process commenced in September 2018; in Botswana, the grant of EL 001/2020 occurred in June 2020 so it should be unsurprising that stakeholder engagement has not yet begun.

The foregoing clarifications are important context for the following section where ReconAfrica responds to the Request for Observations.

ReconAfrica's Response to the Request for Observations on Listed Items in the OHCHR Letter

1. Please provide any additional information and any comments that you may have on the above-mentioned allegations.

ReconAfrica is fully committed to its partnership with the people and the governments of Namibia and Botswana in undertaking oil and gas exploration in the Kavango region at the invitation of those countries and under licences granted by those countries.

ReconAfrica's work in Namibia is guided by – and under the review of – representatives of a wide range of government ministries and regulatory agencies, including: the Ministry of Mines & Energy (MME); the Ministry of Agriculture, Water & Land Reform (MAWLR); the Ministry of Environment, Forestry & Tourism (MEFT); the Ministry of Home Affairs, Immigration, Safety & Security; and others.

In Namibia, ReconAfrica has a joint operating agreement with the state-owned oil-and-gas company, NAMCOR.

Comprehensive and detailed Environmental Impact Assessments, in line with Namibian law and international best practices, have been carried out for our exploratory drilling and seismic programs. As part of these assessments, we engaged with local communities and a range of other stakeholders, including Traditional Authorities and Conservancies. Much of this regulatory consultation work for the exploratory drilling Environmental Impact Assessment was completed prior to COVID lockdowns in Namibia in March 2020; since then, however, we have maintained active and collaborative relationships and ongoing dialogue with interested and affected parties.



ReconAfrica and NAMCOR recently announced the completion of the first low-impact 2D seismic program. We have completed the processing of the data from the seismic program and are confident the results are consistent with data from our two stratigraphic test wells, showing there is a working conventional petroleum system in the Kavango East and Kavango West Regions. Please see the link below for more information about our preliminary assessment of the seismic program.

<https://reconafrika.com/wp-content/uploads/ReconAfrica-Press-Release-110521.pdf>

ReconAfrica is operating in Namibia and Botswana at the invitation of the governments of those countries. In Namibia, we have engaged extensively with stakeholders regarding both our seismic and stratigraphic drilling programs. In Botswana, ReconAfrica has yet to begin any exploratory activity such as drilling or seismic involving operations in the licensed area, but we have introduced the company to national, regional and local governments as well as local stakeholders.

ReconAfrica's website, <https://reconafrika.com>, contains information relevant to your questions. The website also contains fact sheets of relevance to your inquiry, which are directly available via the following links:

- Environment, Social and Governance (ESG): <https://reconafrika.com/wp-content/uploads/ReconAfrica-Fact-Sheet-ESG.pdf>
- Water: <https://reconafrika.com/wp-content/uploads/ReconAfrica-Fact-Sheet-Water.pdf>
- Wildlife: <https://reconafrika.com/wp-content/uploads/ReconAfrica-Fact-Sheet-Wildlife.pdf>
- Exploratory drilling: <https://reconafrika.com/wp-content/uploads/ReconAfrica-Fact-Sheet-Exploratory-Drilling.pdf>
- Drilling Fluid System: <https://reconafrika.com/wp-content/uploads/ReconAfrica-Fact-Sheet-Drilling-Fluid.pdf>
- Seismic: <https://reconafrika.com/wp-content/uploads/ReconAfrica-Fact-Sheet-Seismic.pdf>
- Covid-19: <https://reconafrika.com/wp-content/uploads/ReconAfrica-COVID-19.pdf>

Stakeholders

ReconAfrica is working collaboratively with – and at the invitation of – national governments, regulators, Conservancies and Traditional Authorities, who have the



largest stake and therefore the largest voice in the appropriate economic development of their territories.

It has been proven - by ReconAfrica and other responsible companies around the world - that natural resources can be developed with minimal negative environmental and social impacts.

ReconAfrica has been working closely and directly with Traditional Authorities and communities for more than two years to address issues of concern and earn support for our planned exploration program, which includes a commitment to protect and benefit Namibian people, wildlife and the environment, along with a promise to respect the boundaries of those on the land. Our operating plans, which are reviewed, monitored and approved by governments and Traditional Authorities, have been designed with the goal of minimal negative impact and maximum positive benefit to Namibia. We have met our commitments and have recently received affirmation of support from the affected Traditional Authorities. Please see link: <https://recon africa.com/wp-content/uploads/ReconAfrica-Press-Release-102921.pdf>.

ReconAfrica is fortunate to work in the region of San (Khwe) Indigenous communities in Namibia, and to date has held more than 300 engagement sessions with communities in local languages, to carefully track concerns and address them in follow-up sessions. They are among a number of critically important stakeholders within our operating area, which also includes community Headmen and Headwomen, and Communal Land Board members.

Once our exploration operations in Botswana are defined, we will commence a comprehensive engagement process with Botswana stakeholders including local stakeholders and San indigenous communities in Botswana as part of our planned Environmental Impact Assessment process.

Environment and Wildlife

ReconAfrica is committed to sustainable development and employs industry best practices wherever it operates to protect the environment, including policies and protocols to support wildlife conservation and repopulation efforts.

All National Parks and environmentally sensitive areas, such as the Okavango Delta and Tsodilo Hills, are outside of the petroleum exploration licence area. As an additional measure, ReconAfrica has set no-go buffer zones to protect the environment and wildlife that include a 10-km setback from the Okavango River and 20-km setbacks from the Okavango Delta. In Namibia, where exploratory drilling has begun, stratigraphic wells are located 260 km and more from the Okavango Delta.



We are also engaging and sharing information with KAZA, the multi-country organization that has oversight of the multi-land use area of the Kavango-Zambezi Transfrontier Conservation Area. Our assessment and project planning also takes into account the designated Wetlands of International Importance (Ramsar) but our project activities are outside these designated areas.

ReconAfrica completed extensive environmental surveying and monitoring, which included wildlife surveys on the seismic lines to ensure real-time data was included in our planning in Namibia. In addition, our low-impact 2D seismic program included a non-intrusive exploration method used in validating the presence of oil, and did not interfere with wildlife communication or migratory movements.

As part of its commitment to protecting both the physical environment and the people of the Kavango region, ReconAfrica is implementing the most advanced drilling practices available.

ReconAfrica has a full-time wildlife expert on staff (a former Namibian National Park expert), who monitors wildlife and impacts in collaboration with conservancies and other environmental groups. We have ongoing conservation projects in our licence area in Namibia, including joint wildlife monitoring in both the George Makoya and Kapinga Kamwalye Conservancies, and will work with other Conservancies as we move forward. In partnership with the conservancies and the Ministry of Environment, Forestry and Tourism (MEFT) we are assisting in data acquisition in Namibia with respect to the Southern ground hornbill, wild dogs and elephants. Our eight Community Liaison Officers (CLOs) also survey and monitor, with guidance and training from our wildlife expert. Our team continues to grow in this very important area.

Drilling

ReconAfrica has successfully drilled two stratigraphic wells, which confirmed the presence of a working, conventional petroleum system in the Kavango Sedimentary Basin. The presence of hydrocarbons and conventional reservoir rocks has been confirmed by objective third parties. Third party analysis and reports are available on the ReconAfrica website.

Stratigraphic test wells are drilled with the purpose of gathering information in connection with the subsurface geology and other factors without an intention to produce oil or gas from such wells.

The test wells are not drilled near migratory routes nor any other area that would adversely impact wildlife or the environment. Our first drilling site (Kawe) is located approximately 40 km from the boundary of the Khaudum National Park; 55 km southeast of Rundu; 50 km south of the Kavango River; and about 260 km from the



Okavango Delta in Botswana. Our second drilling site (Mbambi) is 16 km north of the first site.

When drilling, ReconAfrica protects each well, using steel casing (pipes) which are encased in cement. The multiple layers of cement and steel casing provides the structural integrity necessary to prevent fluids from entering or escaping the well.

When a well is drilled, drilling fluid is used to cool the drill bit and carry the rock cuttings to the surface. ReconAfrica has chosen to put in place additional measures to protect the environment by using drilling fluids that are water-based, organic, biodegradable and chloride-free – a sustainable approach that allows for the reclamation and reuse of materials.

Our chloride-free polyamines system is more expensive to implement than older methods – such as plastic pit liners, which can present challenges during the reclamation phase because they often shred and leak. This system uses a 100% freshwater fluid phase as a base, ensuring it is safe for measures such as topsoil development.

We also conduct continuous water and soil sampling as part of our ongoing monitoring, working closely with government agencies in Namibia who ensure compliance with regulations.

The Information Received is incorrect in asserting that containment ponds used to hold drilling fluid are necessarily insufficient where an impervious lining system is not visible in photographs. In fact, industry best practices recognize the use of water-based, organic, biodegradable and chloride-free drilling fluids as a sustainable approach that allows for the reclamation and reuse of materials and reduces the risk of damages from leaking during operations or the reclamation phase. ReconAfrica is using these more expensive, 100% freshwater based fluids in its operations because they are a more safe and environmentally sound practice than relying on older, less-reliable technology like plastic pit liners. ReconAfrica's reserve pit contains bentonite clay/gel. When it gets wet, the molecules swell up to 13 times their dry size and create an impenetrable barrier.

Water-based drilling fluids have been tested and proven safe and environmentally sound and are approved for use by the most stringent regulatory regimes around the world.

Seismic

ReconAfrica's seismic program consisted of small, lightweight tractors – smaller than most vehicles and lighter in weight than any commercial truck – operating, in the daytime only, over a ~450-km stretch of public roads. A number of low-frequency

geophones (the size of a cell phone) are deployed, that gather seismic data as the vehicle travels, at close to idle speed.

The company had measures in place to address noise and vibration issues with our seismic program. We use low-frequency equipment to protect wildlife communications and do not operate at night, when elephants and other wildlife species typically communicate.

Water

ReconAfrica's responsibility is to safeguard all aquifers and water sources and we have incorporated it within our water-management practice, through regular reporting on hydrological data to the appropriate water authorities.

ReconAfrica's water-management plan includes groundwater assessments, hydro census, monitoring, and mitigation. We are working collaboratively with representatives from the Ministry of Agriculture, Water and Land Reform (MAWLR), NamWater, Regional Authorities, Traditional Authorities and other experts and interested stakeholders to protect Namibia's water. The water-management program has three key objectives: aquifer protection; surface water and drainage management; and sustained protection of project no-go zones.

ReconAfrica has conducted comprehensive Environmental Impact Assessments and additional studies to understand the socio-economic, environmental and other technical aspects of our Namibian project to support our water-management program and, in particular, for the protection of the integrity of the region's aquifers and surface water.

Environmental, Social and Governance (ESG)

ReconAfrica employs industry best practices throughout its operations and its Environmental, Social and Governance (ESG) approach to business. Our operations are conducted responsibly and involve the participation of, and input from, communities, Traditional Authorities, governments and other stakeholders.

Our ESG goals include:

- To implement regulatory compliance and include regulatory bodies in a proactive manner;
- To engage openly with stakeholders and work collaboratively to address and manage community impacts;
- To protect the environment, land, water and wildlife;
- To implement a carbon-neutral program to support the Net Zero goals of Namibia and Botswana;

- To enhance the livelihoods of the people of Namibia and Botswana and create socio-economic opportunities; and
- To support positive environmental, economic and social outcomes for Namibians and Botswana.

To date, ReconAfrica has dedicated CAD\$10m (NAD\$112m) toward ESG initiatives. Some highlights of the company's ESG commitments to date include:

- The drilling and donation of 14 solar-powered water wells to communities, with plans for a total of 22 water wells as part of the current program;
- A CAD\$1.3m (NAD\$15m) contribution to support national COVID-19 relief efforts as the pandemic continues to surge in Namibia;
- Local hiring and recruitment; to date, ReconAfrica subsidiary Reconnaissance Energy Namibia (REN) has hired more than 500 Namibian residents;
- Skills transfer initiative, through which Namibian residents are receiving basic training in drilling operations; seismic operations; geology; geophysics; petroleum engineering; core analysis technology; Information Technology; Health, Safety & Environment; and Environmental Management; and
- Active recruiting program with the government of Namibia as well as local academic institutions; additionally, we are working with the Kavango East and Kavango West Governors to support their tertiary education initiative.

As part of its ESG goals and to support Namibia's Net Zero emissions targets, ReconAfrica is developing plans to achieve carbon neutrality. While still at the exploration stage, with a limited emissions profile, the company is prepared to set aggressive targets of its own. Future goals are also likely to be shaped by carbon-reduction commitments established by various levels of governments in its operating regions.

ReconAfrica is transparent in publishing its ESG timeline reports, which it makes publicly available online: <https://recon africa.com/our-sustainable-approach/esg-progress-timeline-reports/>.

Additional relevant information

For completeness, we note that the UNESCO report you reference also states, at page 216, that: *"...the current activities as described in the planning documents are not likely to have a significant direct impact on the property based on their restricted scope and location away from the property"* and *"Any potential future activities, including further exploration stages such as seismic research and drilling of stratigraphic wells should be*

evaluated critically, and be subject to an EIA that corresponds with international standards, including an assessment of social impacts and a review of potential impacts on the World Heritage property in line with IUCN's World Heritage Advice Note on Environmental Assessment."

Additionally, our operations, as noted by UNESCO, do not overlap World Heritage sites or buffer zones.

ReconAfrica has not applied for and does not need permits to allow 'fracing' for any of its activities. Further, ReconAfrica, and the governments of Namibia and Botswana, have gone to great lengths to publicly confirm that their current plans involve exploring the feasibility of production from conventional reservoirs, including those identified publicly in a study conducted by Netherland Sewell & Associates Inc. as to the Kawe 6-2 stratigraphic well. If the relevant government authorities award production licences from those zones, "fracing" would not be necessary.

The use of low level radioactive materials is part of normal well logging operations in extractive industries around the world, and has been for many decades. A list of tools used in the two ReconAfrica wells and technical references can be provided upon request.

Schlumberger, a leading supplier of global oil field services, was contracted by ReconAfrica to provide and manage these services. The government of Namibia has a strict permitting policy for the import of radioactive source tools into the country. This policy has been followed by ReconAfrica and Schlumberger and permits were received prior to import and use of these tools.

These tools measure natural radioactivity in the rocks encountered in the wellbore; no unusual levels of radioactivity were noted.

2. Please provide detailed information on the human rights due diligence policies and processes established by ReconAfrica Canada to identify, prevent, mitigate, and account for how they address the potential negative environmental impacts that a 25-year petroleum exploration license obtained by your subsidiary could cause or contribute to, as set forth in the UN Guiding Principles on Business and Human Rights.

As noted in the introductory section above, neither ReconAfrica nor its subsidiaries have any 25-year licences. We are in the exploration phase, with exploration licences of limited duration. If exploration is successful, we will apply for long-term production licences, which follow from appropriate regulatory and stakeholder engagement

processes in Namibia and Botswana. No production of oil and gas is permitted under an exploration licence.

In addition to the detailed information provided above, ReconAfrica's Code of Business Conduct and Ethics is a set of guiding principles for anyone who works with or on behalf of the company, and defines how we must conduct ourselves in relation to activities that are directly or indirectly related to our business. All of our representatives, including our Board of Directors, management team, employees, contractors and suppliers, regardless of their position and location, must adhere to our Code of Business Conduct and Ethics.

The development of a sustainable business must be based on the highest standards of corporate governance, respect, integrity, responsibility and exemplary conduct.

You can view our Code of Business Conduct and Ethics here:

<https://recon africa.com/wp-content/uploads/Reconnaissance-Code-of-Conduct.pdf>

ReconAfrica has also put in place teams that are dedicated to Environment, Social and Governance, Conservation and Community Engagement. These teams are dedicated to working with the people of Namibia and complying with local laws and international best practices.

Likewise, once our exploration operations in Botswana are defined, teams dedicated to these same priorities will be in place for Botswana.

3. Please provide information on any consultations by your company or its subsidiaries with the affected indigenous communities prior to the approval of the project, and whether their free, prior and informed consent was sought and received, particularly concerning any potential relocation and social, cultural and environmental impacts. We would appreciate information regarding safety measures put in place to hold consultations during the global pandemic.

ReconAfrica respects the value of meaningful engagement with indigenous populations and has incorporated those principles in its engagement programs.

ReconAfrica and Namibian Indigenous Communities

In Namibia, the Traditional Authorities Act 25 of 2000 provides:

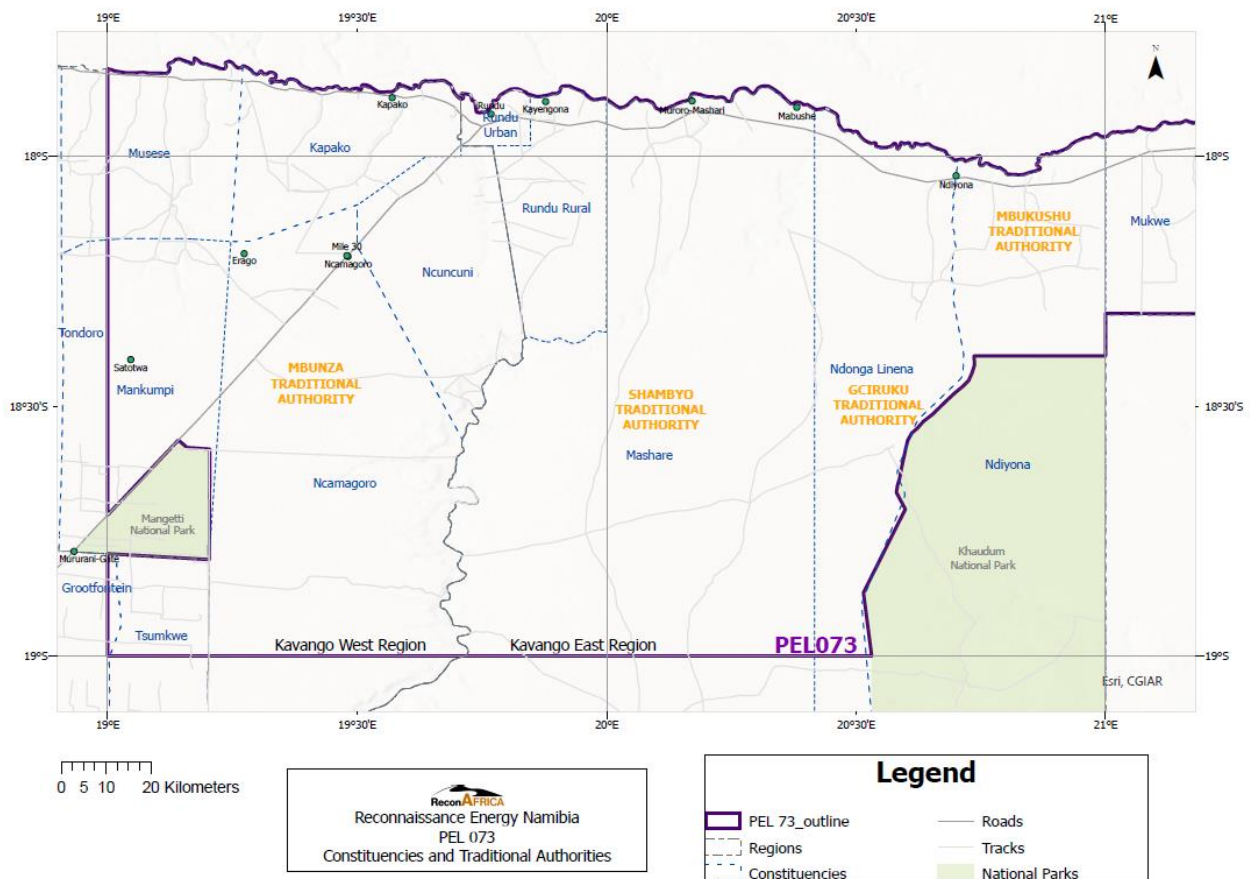
Section (2)(2) A traditional authority shall in the exercise of its powers and the execution of its duties and functions have jurisdiction over the members of the traditional community in respect of which it has been established.

Section 3 further provides that the powers, duties and functions of the traditional authorities and members include:

(b) to assist and co-operate with the Government, regional councils and local authority councils in the execution of their policies and keep the members of the traditional community informed of developmental projects in their area;

(c) to ensure that the members of his or her traditional community use the natural resources at their disposal on a sustainable basis and in a manner that conserves the environment and maintains the ecosystems for the benefit of all persons in Namibia.

The map below shows the traditional jurisdictions in the area:



ReconAfrica held multiple engagements with the five recognized Royal Houses in the Kavango East and Kavango West regions. One of the several engagements was a joint consultative meeting with the leadership of the five Traditional Authorities to discuss

the strengthening of a collaborative approach to sustainable development in the two regions.

In relation to ReconAfrica's project, the Traditional Authorities were represented by the Fumu of the Hambukushu Traditional Authority [REDACTED], Hompa of the Uukwangali Traditional Authority [REDACTED], Gciriku Senior Traditional Councillor [REDACTED], Shambyu Traditional Authority's Chairperson Chief Council [REDACTED] and a representative of the Mbunza Traditional Authority Hompa.

All engagements with the five Royal Houses form part of the continuous engagement and consultation approach adopted by the company to keep our stakeholders informed. Each Hompa and the Fumu was accompanied during engagement by two senior councillors, headmen and headwomen.

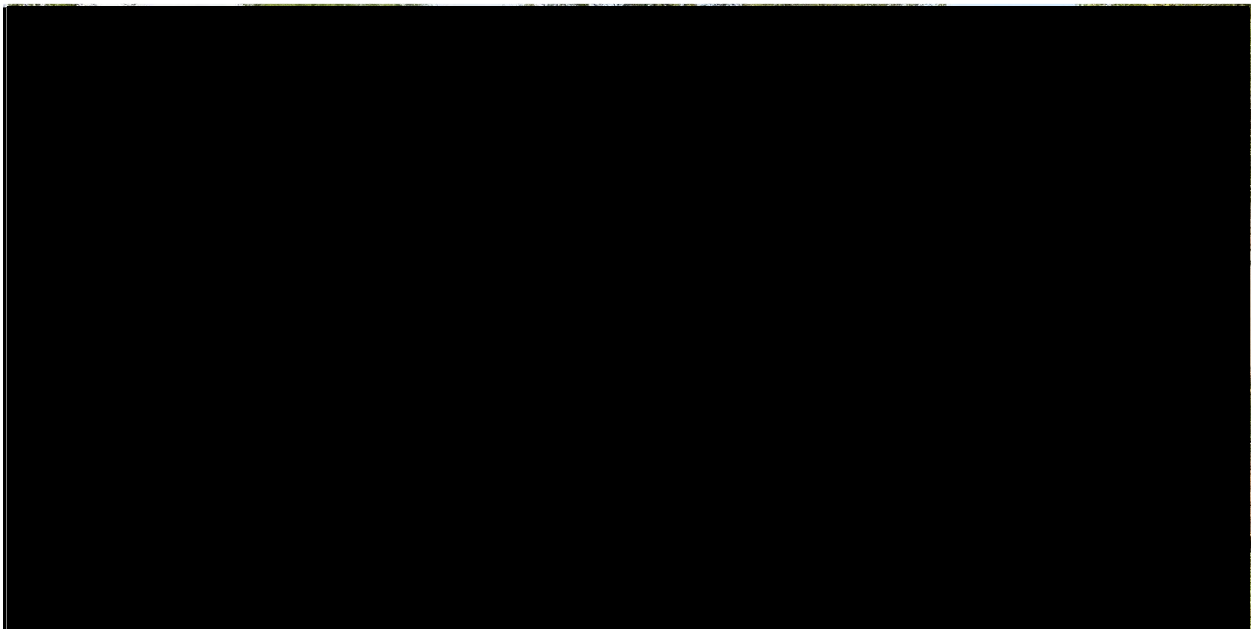
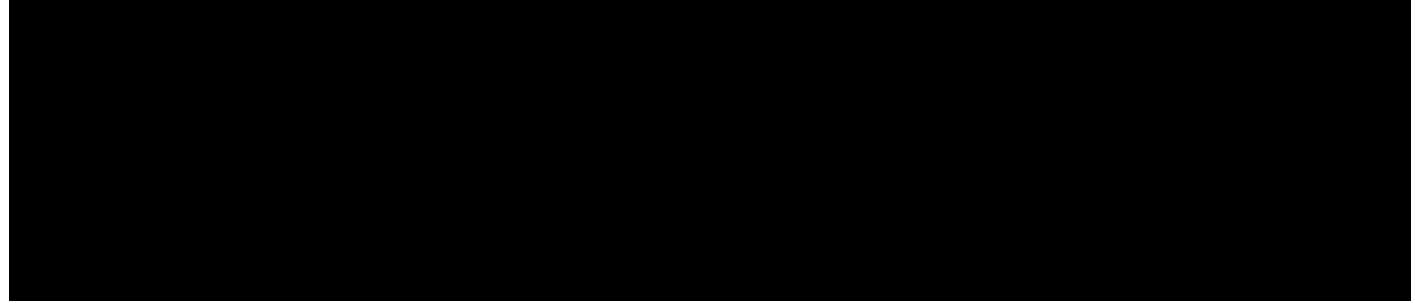


Image 1- Consultative meeting with leadership of the five Traditional Authorities in Namibia in the PEL 73 licence area, October 2021

In addition to our engagement with recognized traditional authorities in our area of operation as contemplated by Namibia's *Traditional Authorities Act 25 of 2000*, we have also conducted extensive engagement, including information sessions and consultations in the villages in and around our 2D seismic and stratigraphic drilling programs, directly with San Communities in Namibia and we recognize and respect their different language groups, consisting of Khwe, Hai|!om, Ju|'hoansi, !Xun, Naro and the !Xóõ. Some members of these groups reside within our project area, while others, such as the Khwe, have villages outside the ReconAfrica project area. Although the Khwe people of the San community are not within our operation area, ReconAfrica was pleased to respond to

their request for information about the project and subsequently engaged with 14 villages of the Khwe community. At our stakeholder engagement sessions, which are conducted in local languages, we track issues and concerns raised and commit to follow-up. We encourage open and transparent engagement with interested and impacted stakeholders.



Images 2, 3, 4- Images from consultation meetings (conducted with translation to local languages) with fourteen San villages, Kavango regions, Namibia, May 2021. Kwe community traditional authority leader, [REDACTED]: "I went to the site where ReconAfrica is operating. Those communities are happy... ReconAfrica I support 100%." Video at https://twitter.com/Recon_Africa/status/1392878444535558145

During our initial 2D seismic program, we hired local people from Kavango East and Kavango West, including San members. We are committed to hiring locally and regionally wherever possible. We have also been fortunate to implement, as part of our ESG program for community outreach and water quality, 14 of 22 planned community boreholes to provide potable water to communities in our project area, and have targeted areas where the San members are present.

As part of our engagement strategy, we have also met with the Council of Churches of Namibia and have conducted two consultation sessions with church leaders in both Kavango East and Kavango West Regions as well as their respective youth leaders. The membership of these churches are composed of members of the San community amongst other Namibians.

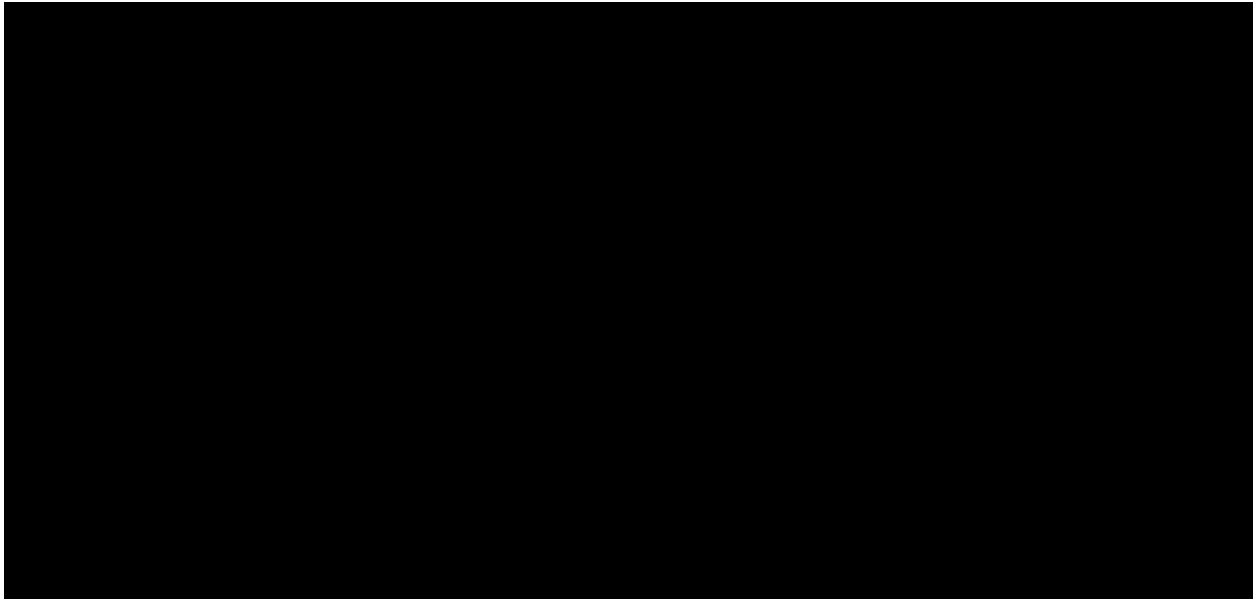


Image 5 Church leaders meeting, Kavango regions, Namibia, November 2021

To date, ReconAfrica has held more than 300 community engagement sessions related to our drilling and 2D seismic programs, to share information and track stakeholder feedback. ReconAfrica has hired eight Community Liaison Officers (CLOs) who are working on a continuous basis. The number of CLOs will increase as the project progresses.

In order to be sure that our engagement and consultation with the San community in Namibia has been appropriate and met the community's needs, ReconAfrica representatives proactively met with the Namibia Deputy Minister of Marginalised Communities, Honourable Royal/Ui/o/oo, on two occasions.

These meetings were consultative in nature and covered the practical needs of the San community specifically, taking special care to include topics such as educational opportunities and the extent to which the San people depend on the environment.

In line with our continued commitment to the San community, ReconAfrica will host the traditional leaders from the San people in Q1 2022 at our sites in Kavango East. This meeting was scheduled for December 2021 but was postponed at the Deputy Minister's request. ReconAfrica is committed to our engagement with affected indigenous communities in Namibia including San, and this will continue for the duration of our project.

Consequently, ReconAfrica is satisfied with the consultations to date and results of this engagement with the affected indigenous communities in relation to our project.

For those consultations which occurred during the global pandemic, ReconAfrica complied with Namibian guidance on social distancing, masking and similar safety rules. A number of meetings were conducted outdoors.

ReconAfrica and Botswana Indigenous Communities

Once our exploration operations in Botswana are defined, ReconAfrica will follow all appropriate procedures for engagement and feedback with indigenous communities in Botswana.

- 4. Please provide details on the measures taken by your company to undertake environmental and human rights assessments regarding the impact of oil and gas exploration activities on the San indigenous peoples in line with international standards, and any plans to adopt appropriate mitigation and protections measures including the installation of impermeable pond liners, leak detection systems, curtailment of surface runoff, and groundwater monitoring.**

We refer here to the information provided above, namely that ReconAfrica's water-management plan includes groundwater assessments, hydro census, monitoring, and mitigation. We are working collaboratively with representatives from the Ministry of Agriculture, Water and Land Reform (MAWLR), NamWater, Regional Authorities, Traditional Authorities and other experts and interested stakeholders to protect Namibia's water. We also have environmental management and waste management plans in place.

ReconAfrica's responsibility is to safeguard water sources and we have incorporated it within our water-management program, which has three key objectives: aquifer protection; surface water and drainage management; and sustained protection of project no-go zones. These goals are supported by regular sampling, monitoring and reporting of hydrological data.

We also are significantly improving community access to potable water with the drilling and donation of 14 solar-powered water wells to communities, with plans for a total of 22 solar-powered water wells by the end of 2022. ReconAfrica employs industry best practices throughout its operations and its Environmental, Social and Governance (ESG) approach to business to ensure all operations are conducted responsibly, involve the participation of communities, Traditional Authorities, governments and other stakeholders to assure their input and feedback is considered in our operating plans.

ReconAfrica has conducted comprehensive Environmental Impact Assessments and additional studies to understand the socio-economic, environmental and other technical

aspects of our Namibian project to support our water-management program and, in particular, for the protection of the integrity of the region's aquifers and surface water.

When drilling, ReconAfrica protects each well, using steel casing (pipes) which are encased in cement. The multiple layers of cement and steel casing provides the structural integrity necessary to prevent fluids from entering or escaping the well.

When a well is drilled, drilling fluid is used to cool the drill bit and carry the rock cuttings to the surface. ReconAfrica has chosen to put in place additional measures to protect the environment by using drilling fluids that are water-based, organic, biodegradable and chloride-free – a sustainable approach that allows for the reclamation and reuse of materials.

Our chloride-free polyamines system is more expensive to implement than older methods – such as pit liners, which can present challenges during the reclamation phase because they often shred and leak. This system uses a 100% freshwater fluid phase as a base, ensuring it is safe for measures such as topsoil development.

We also conduct continuous water and soil sampling as part of our ongoing monitoring.

The Information Received is incorrect in asserting that containment ponds used to hold drilling fluid are necessarily insufficient where an impervious lining system is not visible in photographs. In fact, industry best practices recognize the use of water-based, organic, biodegradable and chloride-free drilling fluids as a sustainable approach that allows for the reclamation and reuse of materials and reduces the risk of damages from leaking during operations or the reclamation phase. ReconAfrica is using these more expensive, 100% freshwater based fluids in its operations because they are a more safe and environmentally sound practice than relying on older, less-reliable technology like pit liners. Water-based drilling fluids have been tested and proven safe and environmentally sound and are approved for use by the most stringent regulatory regimes around the world.

5. Please provide information on the measures taken to ensure that ReconAfrica' subsidiaries and its entire supply chain apply human rights due diligence. In addition, please clarify whether your company has policies, procedures and training that focus on, and set clear expectations for, respect for human rights.

ReconAfrica's Code of Business Conduct and Ethics is a set of guiding principles for anyone who works with, or on behalf of, the company, and defines how we must conduct ourselves in relation to activities that are directly or indirectly related to our business. All of our representatives, including our Board of Directors, management

team, employees, contractors and suppliers, regardless of their position and location, must adhere to our Code of Business Conduct and Ethics.

The Code of Business Conduct and Ethics addresses human rights principles, including respect for human dignity, diversity, equal opportunity, health and safety, non-harassment, protection from violence, legality, integrity, respect, and non-discrimination regardless of gender, religion, nationality, age, marital status, sexual orientation or any other status that undermines human dignity.

The development of a sustainable business must be based on the highest standards of corporate governance, respect, integrity, responsibility and exemplary conduct. As part of our ESG approach to business, we are currently developing a more detailed Human Rights Policy based on Namibia and Botswana laws and international standards that expands on the principles described in the Company's Code of Business Conduct and Ethics.

You can view the full Code of Business Conduct and Ethics here:

<https://recon africa.com/wp-content/uploads/Reconnaissance-Code-of-Conduct.pdf>

6. Please provide information on operation-level grievance mechanisms that your company has established, or participated in, to address adverse human rights impacts, including on indigenous communities, caused by your company.

ReconAfrica is committed to responsible operations, which includes the duty to respect and protect human rights and indigenous authority. As part of our commitment to the people of Namibia, we engage with local communities on an ongoing basis and continually act on their feedback.

Once our exploration operations in Botswana are defined, we will commence a comprehensive engagement process with Botswana stakeholders including local stakeholders and San indigenous communities in Botswana as part of our planned Environmental Impact Assessment process. ReconAfrica is guided by a number of corporate policies to promote and enforce responsible conduct. These include: Code of Business Conduct & Ethics; Anti-Bribery Policy; Whistle Blower Policy; and Workplace Bullying, Harassment, Discrimination and Sexual Harassment Policy. As part of our ESG approach to business, we are currently developing a Human Rights Policy based on Namibia and Botswana laws and international standards that expands on the human rights principles described in the Company's Code of Business Conduct and Ethics.

ReconAfrica's grievance mechanism procedure is to receive and log grievances, ensure grievances are shared in local languages, are tracked, investigated and followed-up until fairly resolved.

ReconAfrica has an email address for anonymous reporting of ethical issues, concerns, and grievances. We are also in the process of setting up a “Whistle Blower line” managed by a third-party entity.

7. Please provide information on the measures taken to ensure that impacted residents have adequate access to basic social, medical, food, safe drinking water and sanitation and other services. Please provide any information on any remedial measures that your company has taken, or has planned for the community members which will be subject to relocation, or forced to relocate due to the loss of access to livelihood sources caused by the oil explorations of your company’s subsidiary.

ReconAfrica maintains its commitment to comply with all local and national laws and with regard for the environment, wildlife and communities.

The project is at initial exploration phase. To date we have drilled two stratigraphic (core) wells on minimal land areas. The land was not being used for any agriculture and/or any livelihood and no people were relocated or displaced.

Our drilling and seismic programs were conducted under a petroleum exploration licence issued by the Government of the Republic of Namibia. Prior to operations, ReconAfrica conducted Environmental Impact Assessments and obtained Environmental Clearance Certificates from the office of the Environmental Commissioner for both our stratigraphic drilling and 2D seismic program.

The company received consent to enter the drill sites and carry out the drilling operations from the duly authorized custodians of the land.

The seismic survey was carried out on existing tracks and roads. We have provided compensation as part of our Communal Land and Other Compensation (Homestead and Community Based) Procedures, which to date has compensated for uncultivated land.

Additionally, ReconAfrica has committed CAD\$10m (NAD\$112m) toward ESG initiatives in Namibia, including:

- The drilling and donation of 14 solar-powered water wells to the community, out of a planned 22 water wells as part of the current program;
- The company has also supported the Ministry of Health and Social Service’s COVID-19 response, with a donation of CAD\$1.3m (NAD\$15m) to fund:
 - Proactive roll-out of vaccination campaigns in the hard-to-reach and remote villages and settlements of Kavango East and Kavango West;
 - In the first month, the campaign administered 2,834 first doses and 794 second doses; 52 of the 81 targeted villages have been covered to date; and

- Local recruitment and hiring; to date, ReconAfrica subsidiary Reconnaissance Energy Namibia (REN) has hired more than 500 Namibian residents;
- Skills transfer initiative, through which Namibian residents are receiving basic training in drilling operations; seismic operations; geology; geophysics; petroleum engineering; core analysis technology; Information Technology; Health, Safety & Environment; and Environmental Management;
- Active recruiting program with the Government of Namibia as well as local academic institutions, and collaboration with the Kavango East and Kavango West Governors to support their tertiary education initiatives;
- An ongoing wildlife survey and monitoring program, working in collaboration with Conservancies and wildlife technical specialists to gather data and support the Namibian government's wildlife objectives;
- Establishment of programs, led by our Community Liaison Officers and Community Engagement teams, to ensure ongoing engagement and communication, in local languages, with impacted and interested stakeholders, Traditional Authorities, Conservancies, Communities and other interest groups;
- More than 300 community engagement sessions related to our drilling and 2D seismic programs to share information and track stakeholder feedback; and
- Community Outreach projects for Agriculture, Health & Wellness and Education.

The company is committed to hiring locally and nationally whenever possible. This includes roles from assistants to senior management to skilled and unskilled labour, such as: Country Manager; electricians; rig floor-hands; project managers; material technical specialists (construction, environment, wildlife surveying, water and hydrology); health, safety and environmental experts; administrative assistants; garden site workers; and general laborers. The local and national employment numbers will increase as we move forward with our exploratory well program.

8. Please describe the measures your company has taken or plans to take to prevent situations like this recurring in future.

We have the upmost respect for your mandate by the United Nations Human Rights Council to report and advise on human rights issues. As a company, we take our responsibility to respect human rights extremely seriously. We recognise that it is of fundamental importance that we avoid, prevent and mitigate causing or contributing to adverse human rights impacts, and to address and remedy such impacts when they occur.

That is why – despite the fact REN is an exploration stage company that has drilled two stratigraphic test wells, which involve the clearing of a drillsite area of approximately 200 m by 200 m square, and conducted a ~450 km low-frequency and lightweight

daytime seismic survey on existing roads – we have undertaken and acted upon our meaningful commitments to the people, wildlife and environment in Namibia.

To reiterate, this has included over 300 community engagement sessions to date, related to our drilling and 2D seismic programs to share information and track stakeholder feedback. We have aligned our community engagement with national and local laws and traditions, having regard in particular to the customs and needs of local and indigenous communities. Our dedication of CAD\$10m (NAD \$112 million) toward ESG initiatives directly benefits local populations.

If and when a commercial reservoir of oil and gas is discovered in Namibia, and if the government decides to progress with production, all required regulatory processes, including stakeholder engagement, will be followed.

In Botswana, planning for exploration activities is in progress. Once those exploration plans for Botswana are defined, an environmental impact assessment process will be commenced, which will include all appropriate Botswana stakeholder engagement, including with San communities in Botswana.

Although REB is in the pre-engagement and pre-approval planning stage and it would therefore be premature to conduct regulatory stakeholder consultations, it is hiring its first Botswana-resident employees and will soon be opening a local office in Gaborone. Consultants are being identified who can assist in the conduct of an Environmental Impact Assessment and related stakeholder engagement in Botswana. Discussions have been initiated with Botswana ministries, who will be a part of REB's exploration activities in Botswana.

We are committed to continuing to work closely with, and under the direct oversight of the governments in both countries, as well as their regional and Traditional Authorities, to ensure we continue to comply with relevant laws and regulations throughout all stages of our operations.

Our engagement with local communities will continue throughout our operations, and we remain dedicated to protecting the environment (air, land, water and wildlife) and supporting the people and welfare of the countries in which we operate.

9. Please indicate measures taken to ensure human rights-based approach to conservation in the areas potentially affected by oil exploration activities and measures envisaged to prevent negative environmental and human rights impacts in these specific areas, including the eleven neighbouring community conservancy concessions.

We refer to the detailed information provided above regarding our engagement with communities, protection of the environment and wildlife, collaboration with affected

Conservancies, substantial ESG commitments, and the way in which everyone who works for or with the company is required to conduct themselves and their work.

Ultimately, the people of Namibia and Botswana, through their Traditional Authorities, elected governments, and regulatory agencies, will determine how they will manage their natural resources.

The Constitution of the Republic of Namibia (1990) provides the set of foundational principles according to which Namibia is governed. Article 95 (L) of the Constitution commits the state to promote sustainable development by “maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians both present and future...”.

The constitutional recognition of environmental concerns triggered widespread legislative reform relating to the management of natural resources in Namibia. The country’s environmental protection effort is currently comprised of the Environmental Management Act (7 of 2007) and its Regulations (2012). It is within these legal terms that REN conducted Environmental Impact Assessments and compiled Environmental Management Plans for its stratigraphic test well drilling and 2D seismic program, which included recognition of the conservancies and a sustainable approach to implementation of the project activities.

Namibia’s Environmental Management Act (7 of 2007) promotes the sustainable use and management of natural resources by establishing principles for decision making on matters affecting the environment. That is the approach REN took when we engaged in a consultative decision-making process with the communal conservancies regarding PEL 73. Wildlife monitoring programs in conservancies were decided upon and agreed upon by both REN and conservancies.

Namibia’s communal conservancies are self-governing democratic entities run by their members, not individuals. These conservancies are obliged by law to have a wildlife utilization management plan to conduct Annual General Meetings and prepare relevant financial reports. REN studied the conservancies’ management plans, recognising that wildlife management is part of, and critical to, their management objectives.

As well as abiding by the laws and regulations of Namibia, REN will continue to ensure that exploration of oil and gas will not negatively impact the management objectives of communal conservancies within our PEL.

REN continues to implement an engagement strategy with stakeholders, including the conservancies, prior to exploration activities in PEL 73. This is in line with the EMP requirements. The engagement strategy allows for both REN and the conservancies to identify and advise where relevant sensitive wildlife migratory routes exist. REN

collaborates with the conservancy on the implementation of exploration activities to ensure that both parties understand the type of exploration activities proposed to be undertaken and how this will be implemented in a sustainable and sensitive manner.

Conservancies are part of community stakeholders including Traditional Authorities, Headmen and Headwomen, Village Development Committees and affected communities. REN's collaborative approach with these stakeholders ensures a sustainable implementation of the project.

Management Plans of conservancies are guiding documents as to how living with wildlife can enhance their livelihoods.

Kavango East and Kavango West have five communal conservancies altogether: Kapinga kaMwalye, Goerge Mukoya, Joseph Mbabangandu, Maurus Nekaro and Muduva Nyangana Conservancies.

REN's current activities are in two conservancies: Kapinga kaMwalye and Goerge Mukoya.

REN has conducted joint wildlife monitoring surveys in the Kapinga kaMwalye Conservancy and the Goerge Mukoya Conservancy to determine the abundance, diversity, and distributions of wildlife. REN identified wildlife management as being critical to the management objectives of conservancies and decided to add value to the wildlife monitoring program of the two conservancies we engaged.

Skills were transferred to conservancy resource and wildlife monitors about wildlife monitoring, community members from the conservancy area were involved in the seismic operation as part of temporal job recruitment, and potential projects in the conservancy area were identified relating to improvement of water infrastructure, existing garden projects and the San Community.

REN has engaged with the Kapinga Ka Mwalye Conservancy beyond the consultations undertaken as part of the EIA process, based on REN's operational planning priorities for seismic activities in that particular location at a particular time.

These have been undertaken on a bi-monthly basis, covering topics including land access approvals, the collaborative approach between REN and the Kapinga Ka Mwalye conservancy to assist the conservancy in improving the wildlife monitoring survey, and the conservancy's acknowledgment and appreciation of REN's wildlife monitoring expert's collaborative approach to enhance both parties' relationship.

Key discussion points, which are part of ongoing engagement with the conservancy, have included Kapinga Ka Mwalye's acknowledgement and recognition of REN's

collaborative approach with the conservancy, proposed seismic activities, operational activities and mitigations to be implemented, the permitting process, land access procedure and fees, and input from the conservancy where relevant to ensure consents from all land owners were obtained. We have also discussed the communication strategy between REN and the conservancy, potential benefits for the conservancy, the local job recruitment process in the conservancy, gender equality, and the San community.

Multiple engagements have also been undertaken with the George Mukoya conservancy, including an introductory meeting with the Manager of the conservancy, the Councillor and Headwoman. Discussion points have included, for example, the conservancy's rules and regulations, proposed seismic operational activities and mitigations, thumper activities and potential impacts, REN's public engagement, and potential local benefits from the project. REN was also invited to attend the George Mukoya Conservancy AGM.

ReconAfrica employs industry best practices throughout its operations and its Environmental, Social and Governance (ESG) approach to business. Our operations are conducted responsibly and involve the participation of, and input from, communities, Traditional Authorities, governments and other stakeholders.

Our ESG goals include:

- To implement regulatory compliance and include regulatory bodies in a proactive manner;
- To engage openly with stakeholders and work collaboratively to address and manage community impacts;
- To protect the environment, land, water and wildlife;
- To implement a carbon-neutral program to support the Net Zero goals of Namibia and Botswana;
- To enhance the livelihoods of the people of Namibia and Botswana and create socio-economic opportunities; and
- To support positive environmental, economic and social outcomes for Namibians and Botswana.

To date, ReconAfrica has dedicated CAD\$10m (NAD\$112m) toward ESG initiatives. Some highlights of the company's ESG commitments to date include:

- The drilling and donation of 14 solar-powered water wells to communities, with plans for a total of 22 by year-end;
- A CAD\$1.3m (NAD\$15m) contribution to support national COVID-19 relief efforts as the pandemic continues to surge in Namibia;

- Local hiring and recruitment; to date, ReconAfrica subsidiary Reconnaissance Energy Namibia (REN) has hired more than 500 Namibian residents;
- Skills transfer initiative, through which Namibian residents are receiving basic training in drilling operations; seismic operations; geology; geophysics; petroleum engineering; core analysis technology; Information Technology; Health, Safety & Environment; and Environmental Management; and
- Active recruiting program with the government of Namibia as well as local academic institutions; additionally, we are working with the Kavango East and Kavango West Governors to support their tertiary education initiative.

As part of its ESG goals and to support Namibia's Net Zero emissions targets, ReconAfrica is developing plans to achieve carbon neutrality. While still at the exploration stage, with a limited emissions profile, the company is prepared to set aggressive targets of its own. Future goals are also likely to be shaped by carbon-reduction commitments established by various levels of governments in its operating regions.

ReconAfrica is transparent in publishing its ESG timeline reports, which it makes publicly available online: <https://reconafrika.com/our-sustainable-approach/esg-progress-timeline-reports/>.

ReconAfrica respects the value of meaningful engagement with indigenous populations and has incorporated those principles in its engagement programs.

ReconAfrica and Namibian Indigenous Communities

In Namibia, the Traditional Authorities Act 25 of 2000 provides:

Section (2)(2) A traditional authority shall in the exercise of its powers and the execution of its duties and functions have jurisdiction over the members of the traditional community in respect of which it has been established.

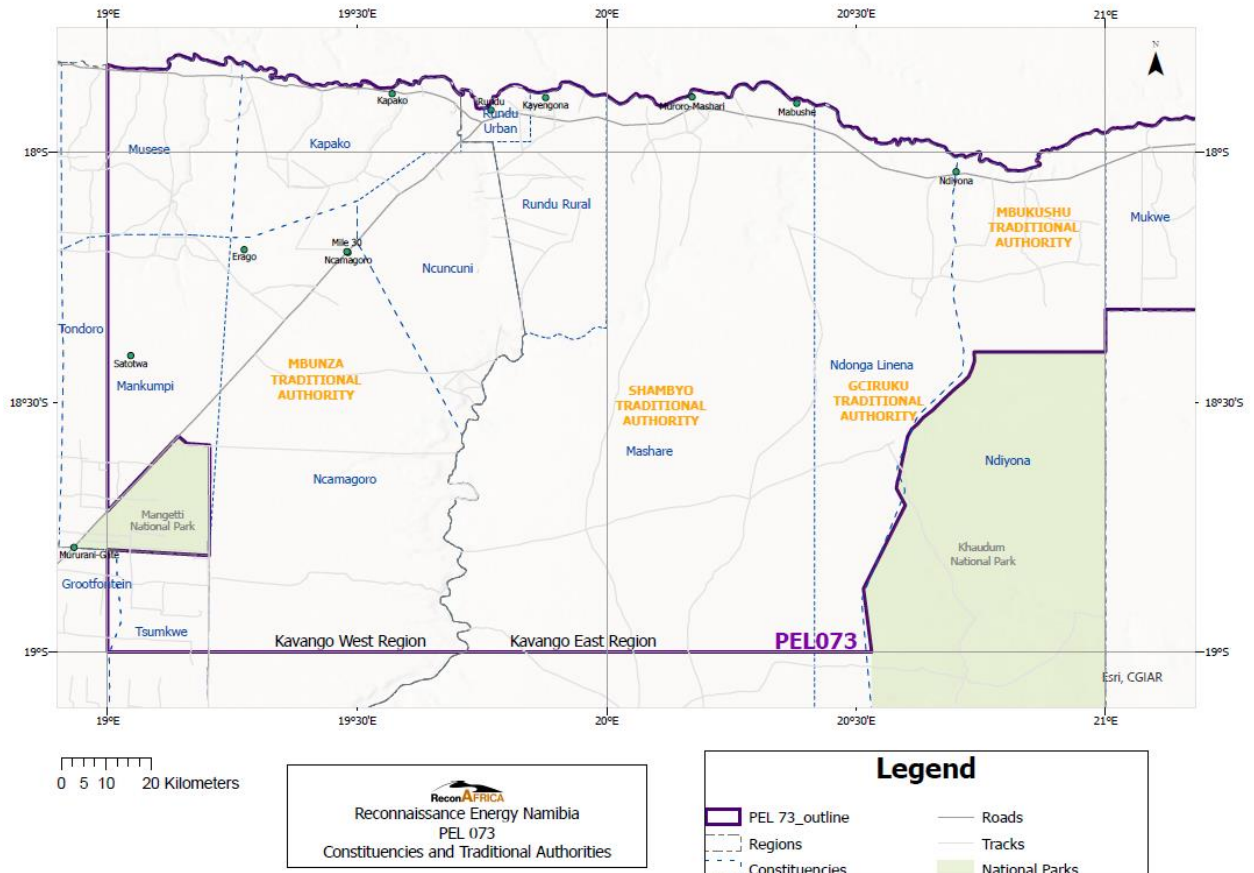
Section 3 further provides that the powers, duties and functions of the traditional authorities and members include:

(b) to assist and co-operate with the Government, regional councils and local authority councils in the execution of their policies and keep the members of the traditional community informed of developmental projects in their area;

(c) to ensure that the members of his or her traditional community use the natural resources at their disposal on a sustainable basis and in a manner that

conserves the environment and maintains the ecosystems for the benefit of all persons in Namibia.

The map below shows the traditional jurisdictions in the area:



ReconAfrica held multiple engagements with the five recognized Royal Houses in the Kavango East and Kavango West regions. One of the several engagements was a joint consultative meeting with the leadership of the five Traditional Authorities to discuss the strengthening of a collaborative approach to sustainable development in the two regions.

In relation to ReconAfrica's project, the Traditional Authorities were represented by the Fumu of the Hambukushu Traditional Authority [REDACTED], Hompa of the Uukwangali Traditional Authority [REDACTED], Gciriku Senior Traditional Councillor [REDACTED], Shambyu Traditional Authority's Chairperson Chief Council [REDACTED] and a representative of the Mbunza Traditional Authority Hompa.

All engagements with the five Royal Houses form part of the continuous engagement and consultation approach adopted by the company to keep our stakeholders informed. Each Hompa and the Fumu was accompanied during engagement by two senior councillors, headmen and headwomen.

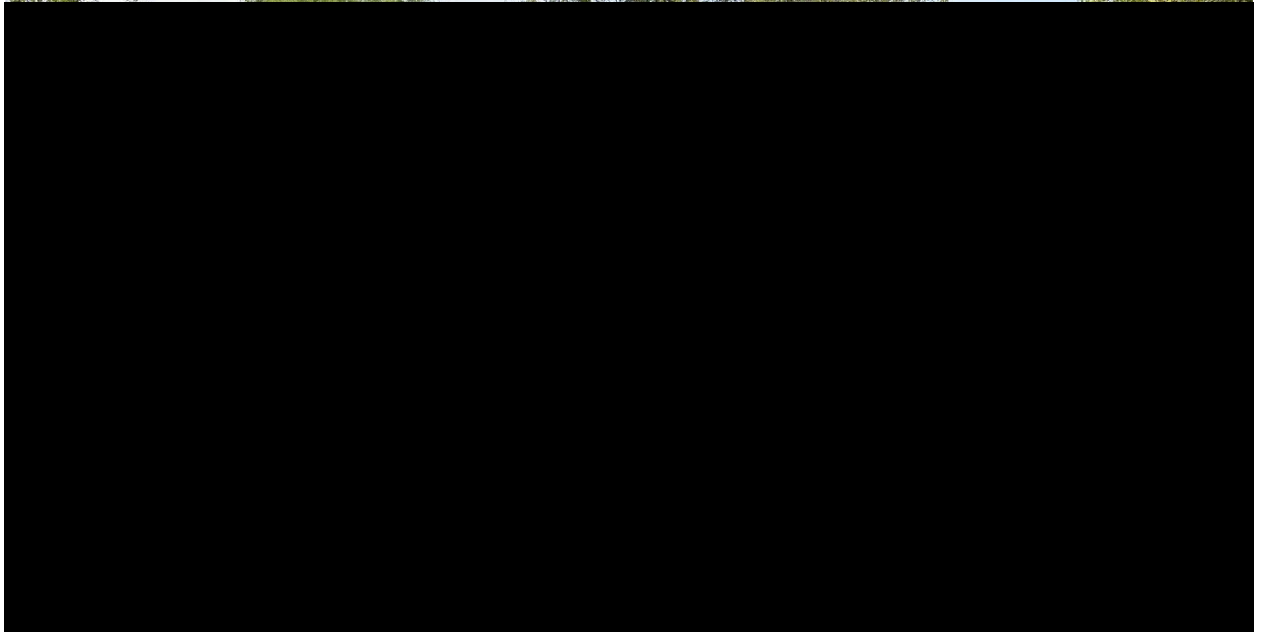
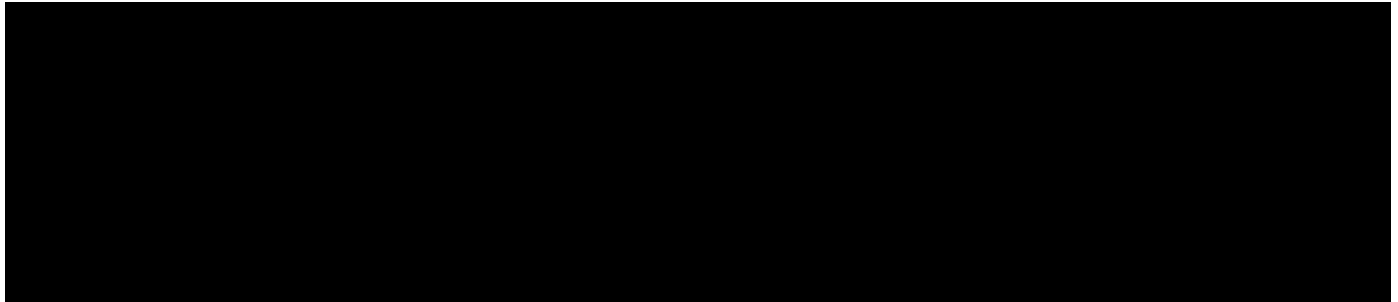


Image 1- Consultative meeting with leadership of the five Traditional Authorities in Namibia in the PEL 73 licence area, October 2021

In addition to our engagement with recognized traditional authorities in our area of operation as contemplated by Namibia's *Traditional Authorities Act 25 of 2000*, we have also conducted extensive engagement, including information sessions and consultations in the villages in and around our 2D seismic and stratigraphic drilling programs, directly with San Communities in Namibia and we recognize and respect their different language groups, consisting of Khwe, Hai | | om, Ju | 'hoansi, !Xun, Naro and the !Xóõ. Some members of these groups reside within our project area, while others, such as the Khwe, have villages outside the ReconAfrica project area. Although the Khwe people of the San community are not within our operation area, ReconAfrica was pleased to respond to their request for information about the project and subsequently engaged with 14 villages of the Khwe community. At our stakeholder engagement sessions, which are conducted in local languages, we track issues and concerns raised and commit to follow-up. We encourage open and transparent engagement with interested and impacted stakeholders.



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As part of our engagement strategy, we have also met with the Council of Churches of Namibia and have conducted two consultation sessions with church leaders in both Kavango East and Kavango West Regions as well as their respective youth leaders. The membership of these churches are composed of members of the San community amongst other Namibians.

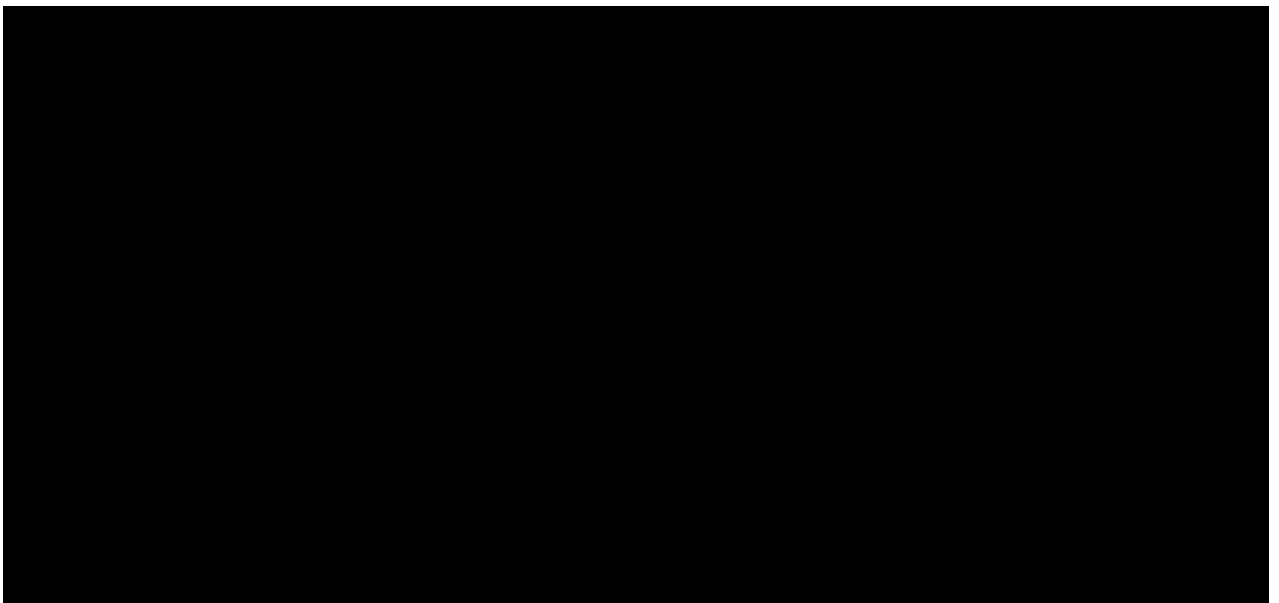


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These meetings were consultative in nature and covered the practical needs of the San community specifically, taking special care to include topics such as educational opportunities and the extent to which the San people depend on the environment.

In line with our continued commitment to the San community, ReconAfrica will host the traditional leaders from the San people in Q1 2022 at our sites in Kavango East. This meeting was scheduled for December 2021 but was postponed at the Deputy Minister's request. ReconAfrica is committed to our engagement with affected indigenous communities in Namibia including San, and this will continue for the duration of our project.

Consequently, ReconAfrica is satisfied with the consultations to date and results of this engagement with the affected indigenous communities in relation to our project.

For those consultations which occurred during the global pandemic, ReconAfrica complied with Namibian guidance on social distancing, masking and similar safety rules. A number of meetings were conducted outdoors.

ReconAfrica and Botswana Indigenous Communities

Once our exploration operations in Botswana are defined, ReconAfrica will follow all appropriate procedures for engagement and feedback with indigenous communities in Botswana.

Conclusion

Having responded above to the Request for Observations and having corrected certain key mis-statements in the Information Received, we would like to now comment on the Expression of Concern.

The Expression of Concern as it appears in the OHCHR Letter focuses on the impacts of oil and gas exploration and extraction on the licensed areas in Namibia and Botswana caused by the



operations of ReconAfrica's locally registered subsidiaries and joint ventures. It is suggested that there are 'strong objections to petroleum exploration and any future extraction that may cause irrevocable damage to the fragile ecosystem and protected areas'.

As we have described above, ReconAfrica is in the exploration stage of its activities in Namibia. We have conducted a ~450 km 2D seismic survey during daylight hours over a three-month period along existing roads in the PEL 73 area using tractors with accelerated weight drop impact mechanism, designed to have minimal impact. We have drilled two stratigraphic test wells, which involved the clearing of two drillsites of approximately 200 m by 200 m square. No commercial production of oil or gas occurs as part of the stratigraphic well drilling. Drilling operations at each site continued for a period of 100 days or less. These drillsites are over 50 km from the Okavango River and over 260 km from the Okavango Delta. No persons or villages were displaced by the drilling of these wells. No gas was flared. No animal migrations were disrupted. No radioactive materials were encountered in the drilling of the wells. No eco-tourism was impeded; in fact, drilling and seismic crews made use of a number of local lodges in 2021 which seemed happy to have the business during a challenging year for tourism. No food security was threatened; in fact, the Kawe 6-2 site, which was not previously cultivated, is now the location of a monitored farming test site where advanced farming techniques are being compared with traditional techniques, and the organic drilling mud residues utilized by ReconAfrica in the drilling of the stratigraphic test wells are being assessed for their fertilizer potential (based on successful use of these residues for such purposes in other countries).

The activities described above in Namibia occurred following environmental impact assessments, environmental management plans and all appropriate consultations required by Namibian environmental laws and which led to the ECCs for drilling and seismic. This included engagement with local citizens including members of the San community in Namibia. Consultation discussions were translated into local languages. ReconAfrica has continued its engagement with local citizens including San during the operational period, exceeding the legally required consultative processes. ReconAfrica employs eight community liaison officers to ensure regular and continuous contact with local residents. To date, ReconAfrica has held more than 300 community engagement sessions, related to our drilling and 2D seismic programs to share information and track stakeholder feedback.

In Botswana, no exploration operations have been or are being conducted on EL 001/2020 that could lead to an Expression of Concern. Once ReconAfrica has defined its exploration plans for Botswana, an environmental impact assessment process will be commenced, which will include all appropriate Botswana stakeholder consultations, including with San communities in Botswana.

The OHCHR Letter states, 'While waiting a reply, we urge that all necessary interim measures be taken to halt the alleged violations and prevent their re-occurrence.' As we have described, ReconAfrica's exploration activities in Namibia are in a hiatus as the results of the first phase of



the seismic survey are being interpreted and evaluated while we select suitable drilling locations based on this new data. Drilling operations were last conducted in July 2021, and seismic operations were last conducted in October 2021.

However, this exploration operational hiatus is not because of the request in the OHCHR Letter where the Information Received contains allegations of violations. ReconAfrica wholly rejects the suggestion that there are any violations, for the reasons described in this letter.

ReconAfrica intends to return to drill additional exploration wells in early 2022 and to undertake a second phase seismic survey, consistent with commitments we have with MME and NAMCOR, and in full accord with regulatory approvals from relevant Namibian ministries who regulate our operations. We regularly receive queries from residents of the licensed area, local contractors and tourist lodges inquiring about when exploration operations will be recommenced. In 2021, ReconAfrica hired over 500 local Namibians, including many members of the San community, in connection with our seismic and drilling activities.

The activities of ReconAfrica that are not in hiatus are our many ESG activities that are occurring in Namibia, and in particular in the PEL 73 licensed area. ReconAfrica committed CAD\$10m (NAD\$112m) to ESG activities during the current exploration phase. This has included a CAD \$1.3m (NAD\$15m) donation to the Government of Namibia for COVID relief, which at our request has included vaccination campaigns for hard-to-reach residents in the Kavango region. We continue to help with the challenges that Kavango residents face with water access; our work in the region has proven the existence of a prolific subsurface aquifer, where ReconAfrica is donating 22 solar-powered water wells to local communities, with 14 wells completed to date.

Consequently, we find the Expression of Concern not only unfounded, but in fact contrary to the reaction we receive in the Kavango region in relation to our activities there. When we speak with regional Governors, regional councillors in Kavango East and Kavango West, Traditional Authorities in Namibia and others in the Namibia and Botswana governments, we receive encouragement and support, and best wishes for exploration success. When Namibia's Parliamentary Standing Committee on Natural Resources visited the PEL 73 licence area in September 2021, independent of the company, they found the same.¹

Therefore, we suspect that the Expression of Concern relates not to what we are doing presently as a company exploring in Namibia, but to what might occur if our exploration activities are as successful as we anticipate that they could be, and we discover commercial quantities of oil and gas and move to the development and production phase. As the Information Received mis-states the actual situation (claiming that we have 25-year licences, and that we are 'commercializing' rather than conducting the first seismic survey), we can understand why you may think that this is already occurring. Please allow us to reiterate what

¹ "Locals Back Oil Exploration", New Era, 13 October 2021, <https://neweralive.na/posts/locals-back-oil-exploration#.YWhln3vISUc.twitter>

we have described above regarding the normal process of production licensing that applies in Namibia and Botswana, consistent with good international regulatory practice. When a commercial discovery occurs in Namibia, ReconAfrica will be entitled to have the relevant portion of Petroleum Exploration Licence 73 converted to a Petroleum Production Licence (PPL). Associated with the issuance of a PPL will be a development plan, an environmental impact assessment, an environmental management plan and associated stakeholder engagement required by Namibian law and regulatory procedures, including with San people as citizens and residents of Namibia.

Moreover, we have been working now for a number of years with the various ministries in Namibia that regulate our activities, including the Ministry of Mines and Energy, the Ministry of Environment, Forestry and Tourism and the Ministry of Agriculture, Water and Land Reform. We have seen their training, knowledge and focus on sound regulatory practices. We are confident that the government and people of Namibia will be well served by the officials of these ministries.

Our early engagement with the relevant ministries in Botswana suggests to us that the same will be the case in Botswana once our operations there reach the stage where there will be more interaction.

Therefore, to the extent that the Expression of Concern relates to impacts of production phase activities, ReconAfrica is of the view that the licensing and regulatory processes of Namibia and Botswana will adequately address these concerns. Accordingly, the Expression of Concern contained in the OHCHR Letter will be suitably addressed once commercial discoveries occur and production operations are imminent. As ReconAfrica, we assure you that stakeholder input will be welcomed at that stage, and stakeholder concerns will be addressed.

If you require further confirmation of the licensing and regulatory procedures applicable in Namibia and Botswana for production operations, we can provide these to you, although we note that our Petroleum Agreement in Namibia, our joint operating agreement with NAMCOR, PEL 73, EL 001/2020, and applicable Namibian and Botswana laws are all available on the internet.

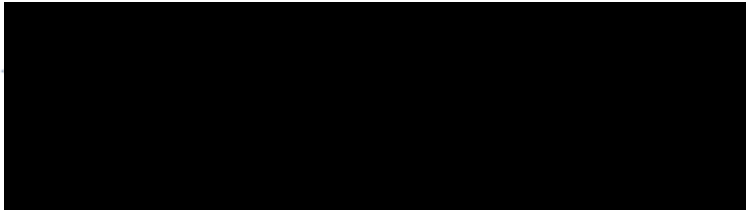
We note that you have sent letters on this subject to the Governments of Namibia, Botswana and Canada. As indicated above, we are working closely with the Governments of Namibia and Botswana, through their appropriate ministries, in respect of the activities being conducted in each of those countries, at a level of engagement that reflects the current stage of exploration activities there. We have also been in regular contact with the Government of Canada through the Trade Office of the High Commission of Canada in Johannesburg, South Africa. We understand that the High Commission will also be providing a response to your letter. We are copying this letter to appropriate personnel at each of these governments, and to NAMCOR, our joint venture partner in Namibia.



ReconAfrica is a company that is committed to complying with its obligations to the governments and peoples of Namibia and Botswana and fulfilling best practices in all its operations. We are determined to continue to do so in the future.

Sincerely yours,

Reconnaissance Energy Africa Ltd.



- cc: Ministry of Mines and Energy, Namibia
Attention: Hon. Thomas Alweendo, Minister of Mines and Energy
Maggy Shino, Petroleum Commissioner

- cc. Ministry of Mineral Resources, Green Technology and Energy Security, Botswana
Attention: Hon. Lefoko Moagi, Minister

- cc. National Petroleum Corporation of Namibia
Attention: Immanuel Mulunga, Managing Director

- cc. High Commission of Canada, Trade Office, Johannesburg, South Africa
Attention: Allan J. Edwards, Senior Trade Commissioner and Head of Office

Best Practices: Environment, Social & Governance (ESG)



Defining who we are as a Company

ReconAfrica's Environmental, Social and Governance (ESG) approach provides a basis for measuring performance against international best practices wherever we operate. We developed and designed our approach to business to meet a set of criteria and standards that guide our operations, policies and practices. In short, ESG is our fundamental operating principle.



ESG Goals

- Implement regulatory compliance and include regulatory bodies in a proactive manner
- Engage openly with stakeholders and work collaboratively to address and manage community impacts
- Protect the environment, land, water & wildlife
- Implement a carbon-neutral program to support the Net Zero goals of Namibia and Botswana
- Enhance the livelihoods of the people of Namibia and Botswana and create socio-economic opportunities
- Support positive environmental, economic and social outcomes for Namibians and Botswanans

ESG in Action

ReconAfrica has been working in collaboration with Namibian governments, Traditional Authorities, Conservancies and communities on a number of ambitious initiatives related to water, emissions, wildlife, reforestation and agricultural enhancement, in addition to ongoing social initiatives. As of the end of 2021, ReconAfrica has dedicated N\$112 million (Cdn \$10 million) toward its ESG initiatives in Namibia.

Our ESG Key Sectors

- Climate Change and Carbon Emissions
- Operational Performance
- Water and Air Quality
- Biodiversity
- Reforestation
- Waste Management
- Regulatory Consultation, Stakeholder and Indigenous Engagement
- Issues & Concerns Management
- Human Rights Standards
- Labour Standards & Human Resource Processes
- Data protection and privacy; management of information
- Gender and Diversity
- Community Outreach Projects
- Corporate Governance Processes

All of our initiatives align with our ESG goals and each project is tied to our ESG Key Sectors. We will apply the same approach in Botswana, in collaboration with key stakeholders. More details on our initiatives are available at <https://recon africa.com>

Opportunities for Namibians

ReconAfrica is committed to local and national hiring in the areas we are exploring. Combined with our on-site job training by our team of highly experienced industry professionals, we are working with local educational institutions to enhance training programs in science, technology, engineering and mathematics (STEM). Additionally, we are seeking ways to support Regional tertiary specialized post-secondary education and training.

Stakeholder Engagement

ReconAfrica has developed a comprehensive and inclusive approach to engagement and consultation. We work with National and Regional governments, traditional authorities, indigenous leaders, communities, conservancies, communal land boards, business leaders, educational institutions and many other stakeholders to ensure our company understands the concerns and expectations of stakeholders. And to ensure stakeholders understand our plans and proposals, with an opportunity to contribute to those plans through meaningful dialogue.

Carbon Neutral Goals

While still at the earliest stage of exploration with a limited emissions profile, the company is committed to carbon-neutral operations, in support of international Net Zero carbon-emissions targets. Future goals are also likely to be shaped by carbon-reduction commitments established by various levels of governments in our operating regions.

Tracking, Measuring, Reporting

ReconAfrica will track, measure and report on our ESG progress on an ongoing basis and will continue to evolve as the company expands its activities in Namibia and Botswana. Our operational activities and tracking mechanisms will be influenced by both operational developments and feedback from a range of Namibian, Botswanan, international stakeholders and ESG experts.



Frequently Asked Questions

How is ReconAfrica supporting local communities?

When ReconAfrica arrived in the Kavango Region, we wanted to do something with immediate and lasting benefit for those living in the area. Working with Namibian officials and local leaders, we learned that nearby access to quality drinking water is a critical issue. We have already completed and donated 14 of a planned 22 community water wells that are providing potable water for those that need it most.

Since we launched our potable water initiative, we made an additional N\$112 million commitment to ESG initiatives in Namibia. We also committed more than N\$15 million to help with COVID-19 relief efforts and vaccinations.

Are locals actually working on this project?

Yes. In 2021, more than 500 Namibian residents worked in such roles as: electricians; rig floorhands; project managers; material technical specialists (construction, environment, wildlife surveying, water and hydrology); health, safety and environmental experts; administrative assistants; garden site workers; and general laborers. Local and national employment numbers will increase as we move forward with our conventional exploratory well program.



Many reports say ReconAfrica is fracing. Is this true?

No. ReconAfrica is conducting a conventional oil exploration program. To date, ReconAfrica has been granted licence by Namibia to explore and confirm the resource. And if this exploratory phase confirms an environmentally and economically viable reserve, the Namibian people and authorities will determine if and how they will extract that reserve.

Why is ReconAfrica drilling for oil when the world is calling for the end of fossil fuels to combat climate change?

ReconAfrica recognizes climate change is real and is taking measures to reduce its carbon footprint, with a goal of being carbon-neutral.

The world is just beginning a multi-decade transition to greener energy sources and ReconAfrica agrees with the Namibian and Botswanan governments that oil will be needed for several decades to come, especially in the developing world. We are here at the invitation of Namibia and Botswana to explore the potential of their energy resources. A stable energy industry can be developed in an environmentally responsible manner to support the development of much needed economic and social benefits, as well as investments in conservation and wildlife protection. Namibia and Botswana, as importers of oil, natural gas and electricity, have established policy, legislation and regulatory structures to encourage the responsible development of their natural resources.

About ReconAfrica

ReconAfrica is a Canadian-based oil and gas company working collaboratively with national governments to explore oil and gas potential in Northeast Namibia and Northwest Botswana – the Kavango Basin.

To date, ReconAfrica has been granted licences by Namibia and Botswana to explore and confirm the presence of their resources; we have no licence to produce oil or to engage in hydraulic fracturing ('fracing').

This project aims to prove a potential reserve that could lead to economic stimulus, funding local and regional jobs and other socio-economic benefits such as increased infrastructure, potable water access and investments in environmental and wildlife conservation. Should oil and gas be discovered, the traditional authorities and elected governments of Namibia and Botswana will determine how they will manage those resources.

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Best Practices: Water

Protecting Kavango's Water

ReconAfrica is implementing the most advanced drilling practices available to protect the environment above and below the surface. We are working collaboratively with government, Regional Authorities, Traditional Authorities and other experts and interested stakeholders to protect the Kavango Region's water – and to provide potable water from the area's considerable aquifer systems.

Water-Management Plan

ReconAfrica's water-management plan includes groundwater assessments, hydro census, monitoring, and mitigation. The water-management program has three key objectives: aquifer protection; surface water and drainage management; and sustained protection of project no-go zones.

Technology to Protect Aquifers and Surface Water

ReconAfrica has conducted comprehensive Environmental Impact Assessments (EIAs) to fully understand and protect the integrity of the region's aquifers and surface water. When we drill a well, we implement safe, proven and effective technologies and techniques designed to prevent contamination. When drilling, ReconAfrica protects the well with one of the most important components in the drilling process – casing. The multiple layers of cement and steel casing provide the foundation of the well, sealing it to prevent any fluids from escaping.

A 100% Organic Drilling Fluid

ReconAfrica is using a 100% organic, waterbased, biodegradable, chloride-free drilling fluid system that minimizes environmental impacts. Water-based systems are the best approach to protect the environment. We install a layer of black liner at the top of the reserve pit simply to prevent erosion. Drilling fluids keep the drill bit cool and bring rock cuttings to the surface that we study to determine if there is oil and gas in the ground.

Avoiding Waterbodies and the Okavango Delta

ReconAfrica will not be exploring or active in the Tsodilo Hills World Heritage Site, the Okavango Delta World Heritage Site or any National Parks. The company has set no-go buffer zones that include a 10-km setback from the Okavango River and 20-km setbacks from the Okavango Delta and Tsodilo Hills. The entire project is being designed to protect the environment.

Technology and Expertise Bring Access to Water

The majority of those who live in the Kavango region rely on the Okavango River for their water supply, or well water for those living in rural



areas further from the river. For many women in Kavango, their daily routine involves walking up to 10 km each way to the closest source of potable water.

ReconAfrica is using its drilling expertise to provide new potable water from the region's considerable aquifer systems; to date, we've drilled four solar-powered community water wells, with plans to drill and donate another 24 water wells.



Frequently Asked Questions

There are many reports that the Okavango Delta is at risk due to ReconAfrica's upstream operations. Is this true?

No. ReconAfrica's operations pose no risk to any sensitive waterbody, including the Okavango Delta. The Okavango Delta is 260 km away from the closest of our three exploratory drill sites and no-go buffer zones have been established to ensure no sensitive waterbody will be impacted.

Will ReconAfrica's operations harm the local water supply?

ReconAfrica is implementing the most advanced technologies and systems available in our exploratory drilling operations to ensure all water, above and below ground, is protected. Our 100% organic, water-based, biodegradable drilling fluid system is the best, most expensive water-based system available and our multiple layers of steel and cement casing eliminates the risk of cross contamination in the well.

ReconAfrica is focused on providing more potable drinking water by using our expertise to drill new community wells that provide much better access to those living in rural areas who previously had to walk up to 10 km to the nearest well. Learn more at <https://reconafrika.com/our-sustainable-approach/the-voices-of-kavango/>

We keep hearing ReconAfrica is going to frac in Namibia and fracing uses a lot of water. How does this protect our water supply?

ReconAfrica is conducting a conventional oil exploration program. To date, ReconAfrica has been granted licence by Namibia only to explore and confirm the resource; we have no licence to produce or frac. And if this exploratory phase confirms an environmentally and economically viable reserve, Namibian authorities will determine if and how it will extract that reserve.

Is it true that conventional oil production can require a lot of water?

For our exploratory drilling program, we require a very minimal amount of water. If a viable new oil reserve is discovered in Kavango, water requirements for conventional wells would remain minimal during drilling. Water would not be required for conventional oil production, as natural below-ground pressures are typically more than sufficient to maintain production for many years in such an undeveloped deposit.



About ReconAfrica

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To date, ReconAfrica has been granted licences by Namibia and Botswana to explore and confirm the presence of their resources; we have no licence to produce oil or to engage in hydraulic fracturing ('fracing').

This project aims to prove a potential reserve that could lead to economic stimulus, funding local and regional jobs and other socio-economic benefits such as increased infrastructure, potable water access and investments in environmental and wildlife conservation.

Should oil and gas be discovered, the traditional authorities and elected governments of Namibia and Botswana will determine how they will manage those resources.

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Best Practices: Wildlife

Wildlife Conservation

ReconAfrica is committed to sustainable development and employs industry best practices wherever it operates to protect the environment, including policies and protocols to support wildlife conservation efforts in Namibia and Botswana. As part of this commitment, we've conducted comprehensive Environmental Impact Assessments (EIAs) to fully understand and protect the region's wildlife.

Committed to Protecting Kavango's wildlife

ReconAfrica is focused on conventional oil and gas reservoirs which flow naturally under their own pressure – we are not fracing. We are implementing the most advanced drilling practices available. We are avoiding ecologically sensitive areas, migratory routes and national preserve areas. We are implementing the world's lowest-impact 2D seismic testing system. We are working with experts across the region to ensure we collect and integrate local feedback and knowledge from communities, businesses, tourism, government authorities and multi-national African conservation groups into our wildlife conservation plans.

To facilitate our environment and wildlife protection programs, ReconAfrica has a wildlife survey and wildlife environmental monitor as part of our team. We're committed to conservation in the region and will continue to work with stakeholders to support those efforts.

Avoiding Sensitive Areas and Migratory Routes

While ReconAfrica is not drilling near migratory routes, the seismic program will cover broader licenced areas, as permitted by government. ReconAfrica will not be exploring or active in the Tsodilo Hills World Heritage Site, the Okavango Delta World Heritage Site or any National Parks. As an additional layer for protection, the company has set no-go buffer zones that include a 10-km setback from the Okavango River and 20-km setbacks from the Okavango Delta and Tsodilo Hills.



We are also incorporating measures and planning activities to avoid migratory routes during seasonal migration periods. The entire project is being designed to protect the environment and wildlife.

2D Seismic: Low-Impact – Low Frequency

- ReconAfrica's exploration commitment in Kavango includes a 450 km, 2D low-impact seismic survey program – a simple, low-impact ultrasound of the Earth.
- We are implementing the world's lowest-impact 2D seismic testing system, the Explorer 860
- All seismic activities will take place only in government-approved license areas
- 95% of seismic survey will be performed on existing roads/tracks
- ReconAfrica will not operate at night, when elephants typically communicate
- There will be no indication of seismic operations after we leave



One Explorer replaces 4 larger Seismic trucks. It operates at a low frequency that does not affect wildlife.

Frequently Asked Questions

You say that you are currently not drilling on wildlife migratory routes, what if you discover oil?

To date, ReconAfrica has only been granted licence to explore and confirm a resource in Namibia. If our exploratory program is successful, Namibian authorities will determine if and how a reserve would be extracted. All regulatory processes, including comprehensive Environmental Impact Assessments (EIAs) and wildlife protection practices would be applicable for any future development. ReconAfrica would include comprehensive mitigation plans in any future developments to ensure migration patterns are considered and there are no impacts on wildlife. We want to protect Africa's diverse wildlife as much as anyone. And we will.

What is the difference between 2D and 3D seismic?

In onshore exploration, 2D seismic is the tool used in new basins like the Kavango. Seismic testing is a process that uses sound waves to determine what's under the earth. 2D seismic pushes soundwaves directly down rather than outward as 3D systems do. Additionally, 2D seismic uses longer, individual lines that are processed individually (3D seismic uses shorter, denser spaced seismic lines that are processed together). This greatly reduces the footprint of the seismic waves being emitted, the equipment required and the impacts to the environment and wildlife.

Recognizing the sensitivities for wildlife in Kavango, the Namibian government ensured all seismic testing would use the 2D low-impact seismic process.

Will seismic testing harm the elephants' sensitive hearing?

ReconAfrica is implementing the most environmentally responsible 2D low-impact seismic system ever developed. This system uses a lower and different frequency than elephants use for communications and we will

not operate at night when elephants typically communicate. Combined with our efforts to avoid migratory routes and the buffer zones set to avoid ecologically sensitive areas, these measures will ensure elephants are protected.

Are the buffers to ecologically sensitive areas like the Okavango Delta permanent?

To date, ReconAfrica has only been granted licence by Namibia to explore and confirm the resource; we have no licence to produce. We fully expect that these zones will be applied for all future activities should a resource be discovered and the Government of Namibia decides to move forward with development.

How can you be sure you are avoiding wildlife migration routes?

ReconAfrica has conducted Environmental Impact Assessments (EIAs) that detail traditional migration patterns for wildlife in Kavango. Working with local experts, authorities and other stakeholders to include their knowledge in the EIAs, we understand where wildlife lives throughout the year and when to avoid sensitive areas at times such as breeding. The governments of Namibia and Botswana must approve our EIAs before we can conduct any activities. And we have a wildlife survey and wildlife environmental monitor as part of our team who is responsible for ongoing monitoring and mitigation of the associated programs.

Meet our Wildlife Monitor

"In all of our operations, ReconAfrica includes comprehensive mitigation plans to ensure we do not harm wildlife. We want to protect Africa's diverse wildlife as much as anyone."



Francois Jahs
Wildlife Survey
& Monitoring

About ReconAfrica

ReconAfrica is a Canadian-based oil and gas company working collaboratively with national governments to explore oil and gas potential in Northeast Namibia and Northwest Botswana – the Kavango Basin.

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This project aims to prove a potential reserve that could lead to economic stimulus, funding local and regional jobs and other socio-economic benefits such as increased infrastructure, potable water access and investments in environmental and wildlife conservation.

Should oil and gas be discovered, the traditional authorities and elected governments of Namibia and Botswana will determine how they will manage those resources.

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Best Practices: Exploratory Drilling



Exploring the Kavango Basin

ReconAfrica is working collaboratively with national governments to explore oil and gas potential in Northeast Namibia and Northwest Botswana – the Kavango Sedimentary Basin. In all aspects of our operations, we are using proven, safe, effective technologies and applying rigorous safety and environmental protection standards.

Stratigraphic Drilling Program

To date, ReconAfrica has received permission from the Government of Namibia to drill three conventional stratigraphic wells to provide a more complete picture of the geological formations in the area. This is a conventional drilling program. We have no license to produce oil or to engage in hydraulic fracturing ('fracing'). Data from the initial wells and seismic program will be used to determine future drilling locations that will aim to achieve commercial levels of oil and natural gas production.

Exploratory Drilling Sites

ReconAfrica is not drilling near migratory routes or any other area that would adversely impact wildlife. Our first drilling sites is located approximately 40 km from the boundary of the Khaudum National Park; 55 km south of Rundu; 50 km south of the Okavango River; and about 260 km from the Okavango Delta in Botswana. Our second drilling site is 16 km north of the first site and our third site is expected to be located approximately 60 km southwest of the initial two wells.

National Parks, the Tsodilo Hills and the Okavango Delta are outside of our licence and the project has set no-go buffer zones to protect the environment and wildlife that include a 10-km setback from the Okavango River and 20-km setbacks from the Okavango Delta and Tsodilo Hills in Botswana.

100% Organic Drilling Fluid

ReconAfrica is using a 100% organic, water-based, biodegradable, chloride-free drilling fluid system that minimizes environmental impacts. Water-based systems are the best approach to

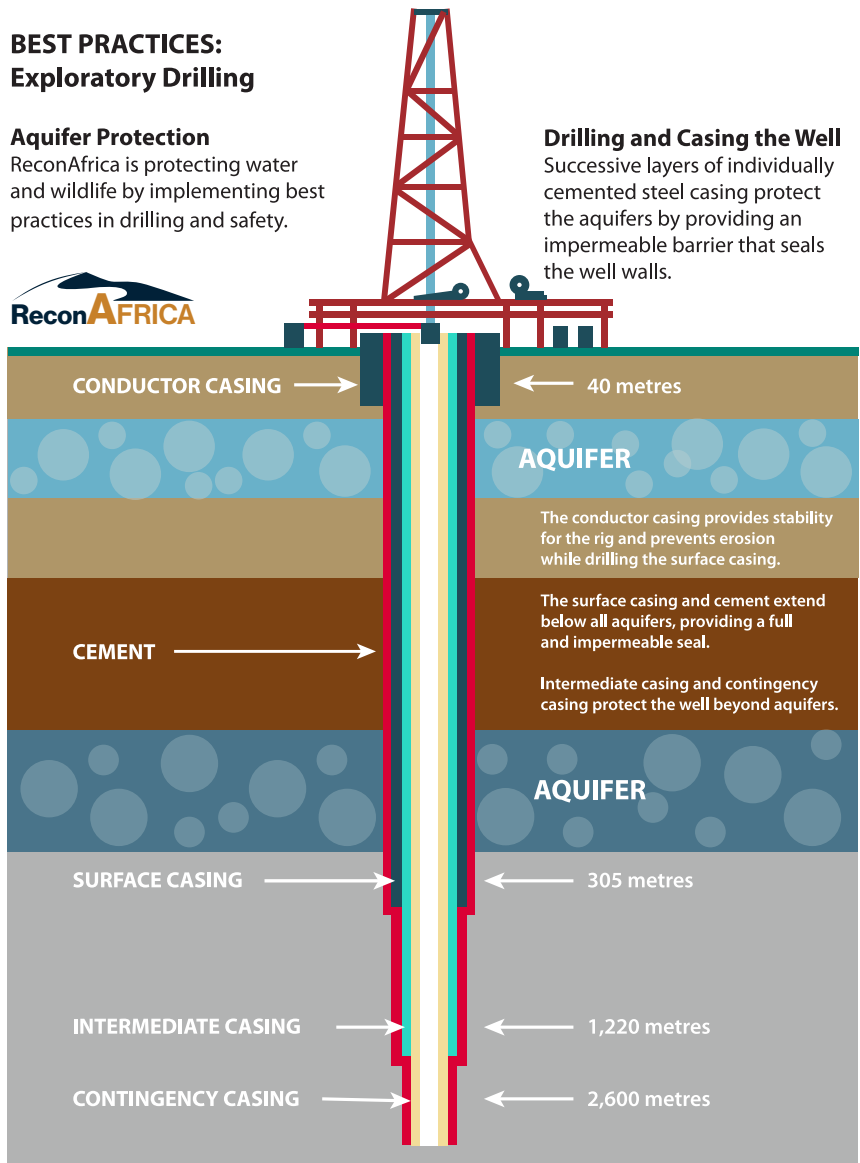
BEST PRACTICES: Exploratory Drilling

Aquifer Protection

ReconAfrica is protecting water and wildlife by implementing best practices in drilling and safety.

Drilling and Casing the Well

Successive layers of individually cemented steel casing protect the aquifers by providing an impermeable barrier that seals the well walls.



FOR ILLUSTRATION ONLY. Not to scale. Each well will vary depending on geology and technical requirements.

protect the environment. We install a layer of black liner at the top of the reserve pit simply to prevent erosion.

Drilling fluids keep the drill bit cool and bring rock cuttings to the surface that we study to determine if there is oil and gas in the ground.



Frequently Asked Questions

Many reports say ReconAfrica is fracing. Is this true?

ReconAfrica is conducting a conventional oil exploration program. To date, ReconAfrica has been granted licence by Namibia to explore and confirm the resource; we have no licence to produce or frac. And if this exploratory phase confirms an environmentally and economically viable reserve, Namibian authorities will determine if and how it will extract that resource.

When do you expect to complete the stratigraphic test well drilling program?

ReconAfrica received approval from the Government of Namibia, in the form of an Environmental Clearance Certificate, for 3 stratigraphic wells. The first well was completed in April 2021 and the second well was completed in July 2021. We anticipate completing the third well by the end of 2021 and may apply for permission to drill a fourth well early in 2022 depending on the analysis of our initial wells and low-impact 2D seismic program.

Drilling of the third well and any additional wells will begin only after we submit updates to the required government documentation.

Do you expect to strike oil when drilling the stratigraphic test wells?

The exploratory stratigraphic wells are not intended to produce flowing oil. We are only analyzing the rocks to determine if there is a working petroleum system in the basin.

How will you know the aquifer is not harmed?

The well casing and drilling techniques we use ensure that there is no impact on aquifers. The wells are fully contained before we introduce our 100% organic water-based drilling fluid system. That system includes measures at the surface to ensure there is no possibility of contamination of water sources above or below the surface.

Additionally, we are drilling water wells at each exploratory well location to identify and analyze aquifers that are present, provide water for our operations and provide adjacent aquifer monitoring during drilling. Following our exploratory drilling program, the potable water wells will belong to the community.



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Best Practices: Water-Based Drilling Fluid Systems

100% Organic Drilling Fluid System

ReconAfrica is using proven, safe, effective technologies and applying rigorous safety and environmental protection standards in all aspects of our operations.

When a well is drilled, drilling fluid is used to cool the drill bit and carry the rock cuttings to the surface. ReconAfrica is using a 100% organic, water-based, biodegradable, chloride-free drilling fluid system that minimizes environmental impacts. This system incorporates the latest technologies for both safe drilling and surface/subsurface environmental protection. It is the most expensive of water-based approaches. We have intentionally avoided older and lower-cost systems, such as lining the fluid reserve pond with plastic, which can present significant challenges – both operationally and environmentally – during the reclamation phase.



System Design

Fluid system:

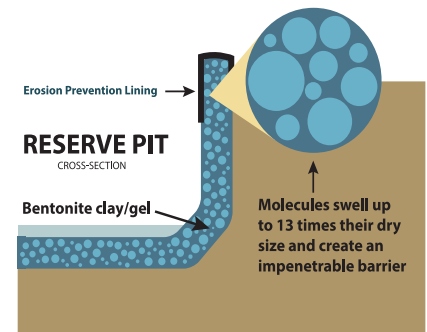
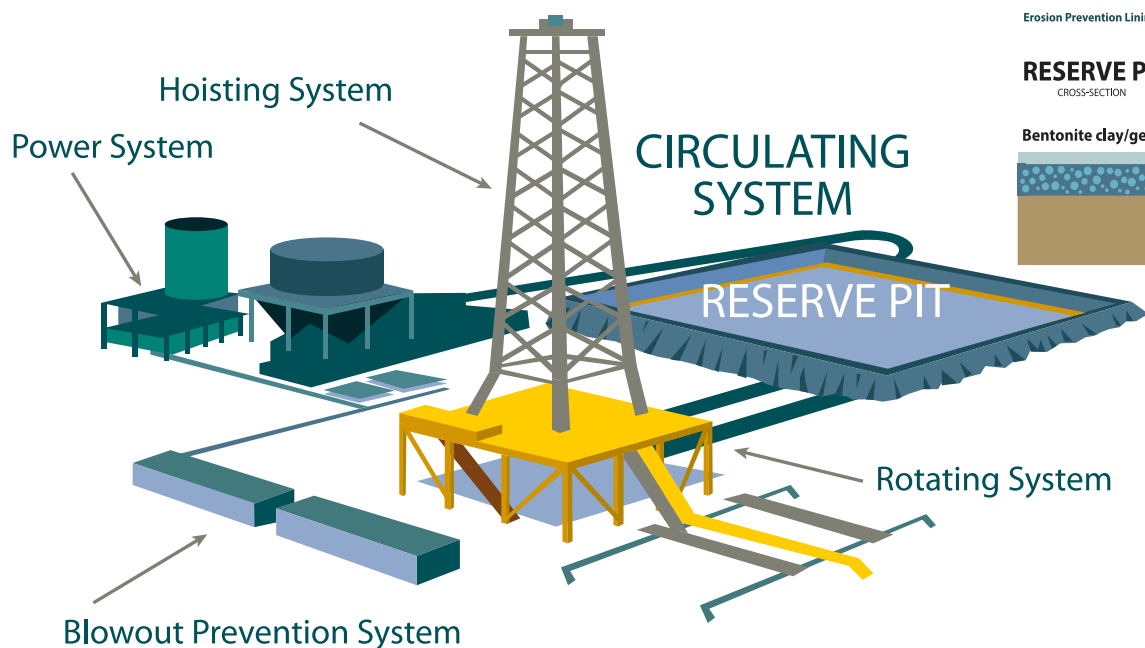
- Water-Based – the best approach to protect the environment
- This Polyamine/ Polymer/PHPA system uses freshwater as the base fluid
- Plant-based products added to base fluid are organic and biodegradable

Circulating System

- Part of our Crown 750 drilling rig
- Includes pumps, distribution lines, separators and solids control
- To further enhance safety, third more powerful pump added

Reserve Pit

- Where excess fluids and cuttings are managed (along with storage tanks)
- Rocks being drilled are benign and any fluids encountered stay in ground
- Cuttings also being captured and bagged for analysis



ReconAfrica's reserve pit contains bentonite clay/gel. When it gets wet, the molecules swell up to 13 times their dry size and create an impenetrable barrier.



About ReconAfrica

ReconAfrica is a Canadian-based oil and gas company working collaboratively with national governments to explore oil and gas potential in Northeast Namibia and Northwest Botswana – the Kavango Basin.

To date, ReconAfrica has been granted licences by Namibia and Botswana to explore and confirm the presence of their resources; we have no licence to produce oil or to engage in hydraulic fracturing ('fracing').

This project aims to prove a potential reserve that could lead to economic stimulus, funding local and regional jobs and other socio-economic benefits such as increased infrastructure, potable water access and investments in environmental and wildlife conservation.

Should oil and gas be discovered, the traditional authorities and elected governments of Namibia and Botswana will determine how they will manage those resources.

Frequently Asked Questions

Why can't I see a black liner on the pond (reserve pit)?

ReconAfrica's reserve pit uses a bentonite clay/gel layer as a safer (and more expensive) alternative to polyurethane pit liners. We are using the same product used widely by farmers and others when their ponds start losing water. What makes bentonite clay/gel such an effective additive for this operation is that once the platelets become saturated with rain or sprayed on water, they swell to 10 to 13 times their dry size, find their way to any cracks or fractures in the pit/ponds, stick together and seal them off to form an impenetrable barrier.

While polyurethane pit linings are generally safe and still used in the industry, they are older technology, can rip during installation and overlaps can leak if not installed correctly. We install a layer of black liner at the top of the reserve pit simply to prevent erosion.

How do you know the reserve pit system is working?

ReconAfrica always has a full-time expert on-site, testing the reserve pit fluid properties on a regular basis. There are also experienced geologists on-site examining the cuttings every 3 metres to understand the formations that are being penetrated, to measure and monitor their properties. As expected, we have not seen any flow or loss of fluid into the ground from the pit.

What will you do with the used drilling fluids once each well is complete?

ReconAfrica will recycle 100% of the drilling fluids and re-use the fluids during drilling operations for the remaining conventional stratigraphic wells.

When drilling is complete, the fluid can be used to fertilize soils. We are currently working with local agricultural authorities to test this process. All our drilling fluid products are organic and biodegradable, promoting nitrogen levels which are an essential nutrient for plant, crop and grass growth. We plan to use this on our own sites and share this excellent topsoil enhancement with nearby farmers.

Our focus is on sustainable development. ReconAfrica will adhere to the most stringent standards and practices to protect the land, the water, the wildlife and Namibia's social well-being. That's our commitment and responsibility.

Where do the cuttings go once captured from the drilling fluid system?

ReconAfrica is having the cuttings analyzed by international and nationally-based environmentally focused laboratories. Half of the cuttings set aside for the Namibian government for future study.

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Best Practices: Seismic

Assessing Geological Formations

Seismic data is used globally for many applications that require a clear picture of the geology under the Earth's surface. Over the years, seismic data has proven to be an invaluable geological assessment tool for government, scientists and industry, including in applications related to oil and gas exploration.

Part of ReconAfrica's oil and gas exploration process requires a two dimensional (2D) low-impact seismic survey program, which will take place in government-approved licence areas.

ReconAfrica developed and submitted an Environmental Impact Assessment (EIA) which outlines the seismic work proposed to take place to the Namibian government and its associated impacts.

In July 2021, Namibia's Ministry of Environment, Forestry and Tourism issued the Environmental Clearance Certificate ("ECC") for the initial 2D seismic program. The program will cover 450 km on our licence in the Kavango East and West regions of Namibia. Activities are expected to begin in late July and should be completed over a 6 to 8 week period.

Environmentally Responsible 2D Seismic

ReconAfrica will initiate a technically advanced and environmentally responsible 2D low-impact seismic survey system, reflective of the importance we place on environmental, social and governance practices. The system, called Explorer 860, is one of the world's lowest-impact units. The system was developed by Polaris, Canada's oldest and most experienced seismic company and a recognized world-leader in low-impact seismic surveys.

The Explorer 860 system uses smaller equipment, flexible lines to avoid trees and critical habitat, mulchers to manage small

undergrowth and prevent root disturbance, and portable support operations to reduce the need for heavy equipment and minimize vehicle access requirements.

This system requires a single small tractor (less than three metres wide) and all tools involved in testing are designed for minimal disturbance. Three Explorer 860 units will be deployed to complete the 450 km 2D seismic program. This low impact seismic program will be conducted along existing roadways during daylight hours to minimize wildlife disturbance.

Low Sound, Low Frequency

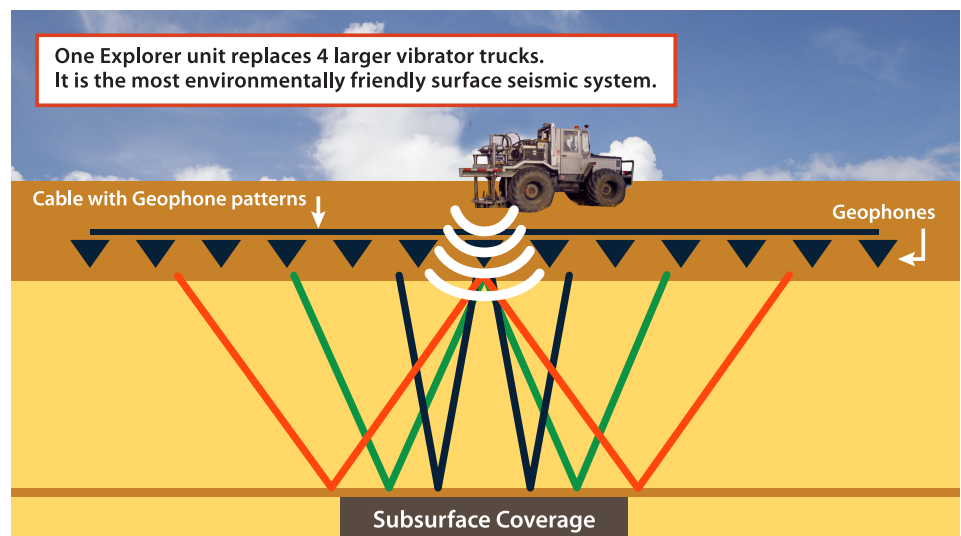
ReconAfrica's low-impact seismic program has been designed specifically with wildlife communications patterns in mind. The Explorer 860 tractor operates at an idle, minimizing sound

disturbance, and the 2D seismic tools operate at a low frequency, designed to not interfere with wildlife communications.

Avoiding Sensitive Areas and Migratory Routes

While ReconAfrica is not drilling near migratory routes or any other area that would adversely impact wildlife, the 2D low-impact seismic program will cover broader licenced areas, as permitted by government. All National Parks are outside of the exploration licence, as is the Tsodilo Hills World Heritage Site and the Okavango Delta World Heritage Site, both located in Botswana. As an additional measure, the project has set no-go buffer zones to protect the environment and wildlife that include a 10-km setback from the Okavango River and a 20-km setback from the Okavango Delta and Tsodilo Hills.

ReconAfrica is also incorporating measures and planning activities to avoid migratory routes during seasonal migration periods. The entire project is being designed to protect the environment and wildlife.



Frequently Asked Questions

Has the low-impact seismic system been proven effective in Africa?

The company that designed the 2D low-impact seismic system, Polaris, has innovated seismic technology to meet the world's strictest environmental standards for low-impact seismic development. This technology has been used worldwide in the most sensitive environments to minimize impacts.

Polaris was the first company to implement low-impact seismic systems on continents around the world and has successfully completed 10 projects throughout East Africa. The Explorer technology has been used, to date, in areas including Murchison Falls National Park in Uganda and the Selous Game Reserve in Tanzania.

What is the difference between 2D and 3D seismic surveys?

Seismic testing is a process that uses sound waves to determine what's under the earth. 2D seismic tests use longer, separate lines that are processed individually and, in onshore exploration, are a key tool in subsurface mapping of new basins like the Kavango. 3D seismic systems use shorter, denser spaced seismic lines that are processed together, providing a sharper image over a specified area. 2D seismic systems greatly reduce the footprint of the seismic waves being emitted, the equipment required and the impacts to the environment and wildlife.

3D seismic surveys are the most common tool used in offshore exploration, although they are employed onshore in some circumstances.

Will you be employing locals during the seismic program?

Yes. The project will be hiring approximately 100 local personnel with line crew training starting July 6th. Additionally, Polaris has established a base in Rundu, Namibia.

How are you continuing to work during the COVID-19 Pandemic?

ReconAfrica follows strict COVID-19 protocols in all of its activities and will continue to do so. The safety of the public and our employees is our top priority. Details of our COVID-19 practices can be found on our Best Practices: COVID-19 fact sheet.

Will seismic testing harm the elephants' sensitive hearing?

ReconAfrica is implementing an environmentally responsible, low-impact 2D seismic system that uses a lower and different frequency than elephants use for communications. In addition, ReconAfrica will not operate at night, when elephants typically communicate.

Combined with our efforts to avoid migratory routes and the buffer zones set to avoid ecologically sensitive areas, these measures will ensure elephants are protected.

How can you be sure you are avoiding wildlife migration routes?

ReconAfrica has conducted an Environmental Impact Assessment (EIA) that includes details of traditional migration patterns for wildlife in Kavango. We know where wildlife lives throughout the year and when to avoid sensitive areas at times such as breeding. We worked with stakeholders to include their knowledge during development of the EIA and the government of Namibia must approve the EIA before we can conduct any activities.

We are committed to protecting Africa's diverse wildlife. To this end, we have a wildlife survey and wildlife environmental monitor working as part of our ReconAfrica team.

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Best Practices: COVID-19

Protecting Employees and the Public

The COVID-19 pandemic has presented many unexpected challenges. By following all government measures and implementing strict policies and protocols, ReconAfrica has been able to safely continue its exploration efforts in the Kavango Region.

In all of our activities, the safety of employees and the public is our number one priority. And COVID-19 has forced us all to be even more diligent, implementing new practices that ensure our activities do not increase transmission of this terrible virus.

Work from Home

Much of ReconAfrica's initial work enabled our team to work from home remotely both in Namibia and Canada. We implemented new virtual online tools to maintain communications and effectively move our project forward. Countless virtual meetings have been held with team members, government officials and other stakeholders throughout the pandemic.

ReconAfrica continues to implement a work from home policy whenever we can, however, with drilling operations beginning in Namibia in early 2020 and the need to engage stakeholders, on-site policies and procedures have been implemented to protect our employees and the public.

Daily Health Checks

Every day, any member of our team that enters a ReconAfrica indoor or outdoor facility must pass the main COVID-19 symptom checks before coming to work. If any symptom is checked off, the employee is asked to stay home and isolate to prevent the spread. Additionally, we screen for exposure to family or friends who are experiencing symptoms or have tested positive for COVID-19. If an employee has had exposure they will be asked to quarantine for 14 days.

Masks and Social Distancing

Once permitted on site, we expect everyone to follow masking and social distancing guidelines. We encourage wearing a mask outdoors and everyone wears a mask indoors at all times.

While the nature of the work on our sites sometimes requires closer contact, we implement a 2 metre social distancing policy whenever possible.

Public Engagement Meetings

When the pandemic began, we needed to refocus our engagement program to meet government protocols and policies. We shifted our focus from face-to-face meetings and sessions to online virtual engagement tools.

As protocols were adjusted, we adjusted our engagement program to include face-to-face outreach meetings and forums. Our health checks, masking and social distancing protocols were followed at all times to protect those participating in our sessions.

We continue to engage stakeholders regularly and will follow government protocols and guidance with respect to our activities depending on the COVID-19 situation in Namibia and Botswana.



Supporting the COVID-19 Fight in Namibia

Since the COVID-19 pandemic first struck, ReconAfrica has been helping the people of Namibia with much-needed support. In 2020, the company provided medical equipment and followed that up with a N\$15-million financial commitment in 2021 to help with immediate health-care response and longer-term support.

The funds will be used to support vaccine update campaigns in the Kavango region and the purchase of medical equipment, such as oxygen systems for hospitals in both Kavango East and Kavango West.



Frequently Asked Questions

How are you continuing to work during the COVID-19 Pandemic?

In addition to complying with all government imposed COVID-19 measures, ReconAfrica follows strict COVID-19 protocols and policies in all of its activities and will continue to do so. The safety of the public and our employees is our top priority. We are protecting our employees and the public by implementing work from home programs; health check protocols; mask and social distancing mandates; public engagement safety protocols and procedures; and strict travel measures to prevent the spread of COVID-19.



Do contractor companies follow the same COVID-19 protocols and policies as ReconAfrica?

ReconAfrica ensures that any contractor must follow all COVID-19 safety measures to protect employees and the public. If you work for ReconAfrica you follow our rules.

How is ReconAfrica helping Namibia fight COVID-19?

We understand that COVID-19 is having a severe impact on Namibia. We also understand that resources are limited and that support is needed. ReconAfrica considers itself a member of the community in the areas we operate and with that comes a duty to contribute.

As a company that has established meaningful relationships and roots in Namibia - with employees, contractors, suppliers, community members and national leaders, ReconAfrica has responded to calls for assistance by the Government of Namibia with its recent commitment of N\$15-million to the country's COVID-19 Vaccine Rollout Campaign. The money will support the procurement, distribution, and administration of vaccines. This is in addition to the healthcare support we provided in the Kavango area in late 2020.

Is ReconAfrica also supporting Botswana's COVID-19 efforts?

While we currently are not operating in Botswana, we are working with the government to design an exploration program there as well. We are also in discussions to determine how we can best support Botswana's efforts to combat COVID-19. When planning community investment and support, ReconAfrica always consults those who know their needs best to ensure we are targeting the right areas that will bring the most impact.

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