

# Amandelbult Complex Audit Packet

February 2024



Initiative for Responsible  
Mining Assurance



**IRMA**

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## Two Anglo American mines are first South African operations audited against the IRMA Standard for Responsible Mining

### *Amandelbult and Mototolo achieve IRMA 50 and IRMA 75, respectively*

16 Feb 2024 – Today the Initiative for Responsible Mining (IRMA) released the audits of Anglo American's Amandelbult and Mototolo PGM operations against the IRMA Standard for Responsible Mining. Independent audit firm ERM-CVS assessed Amandelbult at IRMA 50 and Mototolo at IRMA 75 when measuring their performance against the Standard's best practice social and environmental criteria.

IRMA also released the surveillance (interim) audit for Anglo's Unki PGM operation in Zimbabwe, as conducted by audit firm SCS Global. In 2021, Unki achieved IRMA 75 in IRMA's first-ever on-site audit; a surveillance audit is a more limited check-in, so it does not result in further detailed scoring but rather provides updates on performance.

IRMA 50 or 75 means that ERM-CVS verified that the operations at least substantially met all 40 critical requirements of the IRMA Standard, as well as at least 50 or 75% of the Standard's criteria in each of the four principle areas: social responsibility, environmental responsibility, business integrity and planning for positive legacies. The full audit reports are available on the [Amandelbult](#) and [Mototolo](#) audit pages, as well as [Unki's](#) surveillance report, on the [IRMA website](#).

**"The information stakeholders need to decide what's going well — and what may require more attention."**

"This report demonstrates that mines can point to transparent, independent evaluations of their environmental and social performance," said **Aimee Boulanger, Executive Director of IRMA**. "Through detailed IRMA audit reports, mining companies, communities and companies that purchase mined materials can gain the information they need to decide what's going well — and what may require more attention — at specific mines."

As the IRMA Standard is recognized and adopted around the globe, these audits are first steps in a deepening dialogue between mining companies and those affected by their operations. Because the process is still evolving, IRMA cautions that the initial results should be reviewed and interpreted accordingly.

"These mines began audits during the early Covid years. The timeline was delayed by travel challenges, and then the company's decision to use the optional corrective action period to make improvements. The public has long awaited opportunity to review the information included here, and we applaud Anglo American for volunteering these mines for audit against such comprehensive criteria." **Ms. Boulanger went on to say**, "That said, the IRMA Standard is relatively new for companies that volunteer to be audited, and even our accredited auditors are still learning. The same is true for community members and workers who are interviewed as

# IRMA Initiative for Responsible Mining Assurance

part of the process, some of whom may not yet feel comfortable engaging. So, the Amandelbult and Mototolo audits need to be read with this in mind.”

The reports also provide an honest accounting of IRMA’s progress as the Standard and assessment process continue to mature.

“If the results don’t fully reflect the experience of communities, Indigenous rights holders or other affected groups, we want to hear from them,” Ms. Boulanger said. “We’ll help them communicate with the company to better understand its performance, and with the auditors on any issues they feel were overlooked in the review. This is a cornerstone of our own commitment to transparency. We invite anyone who has criticisms of our work to join us in making it better. Finding ways to improve is built into our system — and a measure of its success.”

The IRMA Standard is being updated in 2024; input on how to improve the IRMA Standard is welcomed. Chapters in the IRMA Standard include requirements on protection to human rights, water resources, worker health and safety, biodiversity, Indigenous free, prior, informed consent and more.

**“Committing to an IRMA audit reflects our desire to improve and our openness to dialogue.”**

Craig Miller, CEO of Anglo American Platinum said, “This significant milestone at Mototolo and Amandelbult mines in our overall adoption of IRMA enables us to promote transparency and best practice in sustainability, while adding value to our global customers by helping them to meet increasing expectations for responsibly mined materials in an efficient and credible way. With Unki mine achieving IRMA 75 in 2021, and now the achievements of Mototolo with IRMA 75 and Amandelbult with IRMA 50, we are continuing to make great progress towards our sustainable mining plan target of having all our mining operations assured against a recognised responsible mining standard by 2025.

Including Amandelbult, Mototolo and Unki, [19 industrial-scale mines worldwide are within the IRMA independent assessment system](#). After an initial self-assessment, a participating mine engages a third-party audit firm — trained and approved by IRMA — to conduct a detailed independent evaluation, including on-site visits to the mine and nearby communities. Following the release of the initial audit, a shorter surveillance audit checks on the mine’s performance. Three years after the initial audit, the operation is fully audited again (Note: The first mines audited in the IRMA system have had extensions to this timeline due to Covid delays and launch-phase learning; updated full reviews will be required to maintain or increase achievement scores.)

The independent IRMA system is the only global mining standard that provides equal power to the public sector (communities and Indigenous rights holders, mine workers, and environmental and human rights advocates) alongside the private sector (mining companies, mined materials purchasers and investors).

# IRMA Initiative for Responsible Mining Assurance

## **Learn more at the Feb 27th Webinar Q&A**

- REGISTER: <http://tinyurl.com/IRMAwebinar-A-M>
- Tuesday, 27 Feb, 4pm South Africa time (UTC+2)
- Speakers:  
IRMA Executive Director Aimee Boulanger,  
IRMA Africa Regional Lead Davidzo Muchawaya  
IRMA Assurance Director Michelle Smith,  
Anglo American Platinum Head of Sustainability Stephen Bullock
- A discussion and Q&A about the meaning of the audit results, and how the increased transparency an IRMA audit provides can be used by stakeholders to improve the operation.
- All registrants will receive a recording.

## **For More Information:**

- Alan Septoff, +1.301.202.1445, [aseptoff@responsiblemining.net](mailto:aseptoff@responsiblemining.net)
- Amandelbult audit packet: <https://responsiblemining.net/amandelbult-packet>
- Mototolo audit packet: <https://responsiblemining.net/mototolo-packet>
- Unki audit packet: <https://responsiblemining.net/unki-packet>
- Amandelbult IRMA audit page: <https://responsiblemining.net/amandelbult>
- Mototolo IRMA audit page: <https://responsiblemining.net/mototolo>
- Unki IRMA audit page: <https://responsiblemining.net/unki>

# Amandelbult Complex Audit Details

Name of Mine:	Amandelbult Complex, Rustenburg Platinum Mine Ltd.
Operating Company:	RPM Ltd
Mine Owner:	Anglo American
Country of Operation:	South Africa
Mined Material(s):	Platinum, Rhodium, Gold and Chrome
# Employees / contractors:	12,523 employees and 3,493 contract workers for mine activities and 1,495 contract workers for non-mining activities at the time of the audit.
IRMA Audit Webpage	<a href="https://responsiblemining.net/amandelbult">https://responsiblemining.net/amandelbult</a>
Audit Type:	Initial IRMA Verification Audit
Audit Dates:	Stage 1 Audit: 4 June – 1 July 2021 Stage 1.5 Virtual Audit: 30 November – 3 December 2021 Stage 2 Audit: 16 - 20 May 2022 Follow-up Assessment: 25 - 26 May 2023
Audit Team:	Philip Underhill – Lead Auditor Will Huggett – Auditor, Environmental, Health, and Safety Prenisha Chetty – Auditor, Environmental, Health, and Safety Andrew Mathewson – Auditor, Social Danielle Sanderson – Auditor, Social Maitshoko Tumane – Support and translation Malefa Moleme - Support and translation
Audit Firm Declaration:	<ul style="list-style-type: none"><li>✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) as presented during the Stage 1 and Stage 2 audits.</li><li>✓ The audit team members were deemed to have no conflicts of interest with the mine.</li><li>✓ The audit team members were professional, ethical, objective, and truthful in conducting the audits.</li><li>✓ The information in this report is accurate according to the best knowledge of the auditors that contributed to the report.</li></ul>
Scope of Audit	The scope includes extraction concentration, and processing of ore, and mining-related waste disposal at Amandelbult's mine site, located in the Limpopo province, South Africa.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
Certification Body (CB):	ERM CVS
CB Technical Reviewer:	Karin Arnold
Achievement Decision Date:	16 February 2024
Achievement Valid Until:	15 February 2027 (contingent upon outcome of surveillance audit and continuous compliance with the IRMA independent audit processes)
IRMA Reference Number:	IRMA-STD-ERM-001-V-03447

# Amandelbult Complex Findings Summary

## Audit Outcome

The site is recognized as having achieved the level of IRMA 50 based on the performance recorded because of the Stage 1 and Stage 2 audit activities.

## Scores by IRMA Standard Principle and Chapter

The table below provides a summary of the chapter-specific outcomes, and overall average scores per principle. Note, these scores are weighted based on the number of relevant requirements in each chapter.

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
<b>Principle 1: Business Integrity</b>		<b>85</b>	<b>112</b>	<b>76%</b>
Chapter 1.1—Legal Compliance	Yes	14.5	16	91%
Chapter 1.2—Community and Stakeholder Engagement	Yes	20	30	67%
Chapter 1.3—Human Rights Due Diligence	Yes	17	24	71%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	17	22	77%
Chapter 1.5—Revenue and Payments Transparency	Yes	16.5	20	83%
<b>Principle 2: Planning for Positive Legacies</b>		<b>110</b>	<b>136</b>	<b>81%</b>
Chapter 2.1—Environmental and Social Impact Assessment & Management	Yes	51.5	58	89%
Chapter 2.2—Free, Prior and Informed Consent	No	-	-	-
Chapter 2.3—Community Support and Benefits	Yes	11.5	16	72%
Chapter 2.4—Resettlement	No	-	-	-
Chapter 2.5—Emergency Preparedness and Response	Yes	9	10	90%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	38	52	73%
<b>Principle 3: Social Responsibility</b>		<b>171</b>	<b>196</b>	<b>87%</b>
Chapter 3.1—Fair Labor and Terms of Work	Yes	55.5	64	87%
Chapter 3.2—Occupational Health and Safety	Yes	43	46	93%
Chapter 3.3—Community Health and Safety	Yes	17	22	77%
Chapter 3.4—Conflict-Affected and High-Risk Areas	No	-	-	-
Chapter 3.5—Security Arrangements	Yes	30	38	79%
Chapter 3.6—Artisanal and Small-Scale Mining	No	-	-	-
Chapter 3.7—Cultural Heritage	Yes	25.5	26	98%

<b>Principle 4: Environmental Responsibility</b>		<b>124</b>	<b>168</b>	<b>74%</b>
Chapter 4.1—Waste and Materials Management	Yes	40	54	74%
Chapter 4.2—Water Management	Yes	25	40	63%
Chapter 4.3—Air Quality	Yes	15.5	18	86%
Chapter 4.4—Noise and Vibration	Yes	13	16	81%
Chapter 4.5—Greenhouse Gas Emissions	Yes	13	14	93%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	17.5	26	67%
Chapter 4.7—Cyanide Management	No	-	-	-
Chapter 4.8—Mercury Management	No	-	-	-

\* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials from ASM operations, then Chapter 3.6 would be marked as not relevant.

Chapters deemed “Not Relevant” do not factor into the principal scores.

## Performance on Critical Requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve full certification (IRMA 100) must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

### Performance on 40 Critical Requirements.

#### RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

### Principle 1: Business Integrity

1.1.1.1	The operating company shall comply with all applicable host country laws in relation to the mining project.	
1.2.2.2	The mine fosters two-way dialogue and meaningful engagement with stakeholders	
1.3.1.1	The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights.	
1.3.2.1	and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships.	
1.3.3.3	The operating company is taking steps to remediate any known impacts on human rights caused by the mine.	



1.4.1.1.	Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation.	
1.5.5.1.	The operating company has developed, documented, and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.	

### Principle 2: Planning for Positive Legacies








2.1.3.1	The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project.	
2.2.2.2.	New mine sites have obtained the FPIC of indigenous peoples, and existing mines either have obtained FPIC or can demonstrate that they are operating in a manner that supports positive relationships with affected indigenous peoples and provides remedies for past impacts on indigenous peoples' rights and interests.	—
2.4.7.1.	If resettlement has occurred, the mine monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met.	—
2.5.1.1.	All operations related to the mining project shall have an emergency response plan	
2.5.2.1.	and there is community participation in emergency response planning exercises.	
2.6.2.1.	Reclamation and closure plans are compatible with protection of human health and the environment,	
2.6.2.6.	and are available to stakeholders.	
2.6.4.1.	Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring).	

### Principle 3: Social Responsibility

3.1.2.1	Workers' freedom of association is respected.	
3.1.3.3.	Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	
3.1.5.1.	Workers have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to workplace-related issues.	
3.1.7.2.	No children (i.e., persons under the age of 18) are employed to do hazardous work	
3.1.7.3.	and no children under the age of 15 are employed to do non-hazardous work.	
3.1.8.1.	There is no forced labor at the mine site or used by the operating company.	
3.2.4.1.a, b	Workers are informed of hazards associated with their work, the health risks involved and relevant preventive and protective measures.	
3.3.1.1.	The risks to community health and safety posed by the mining operation are evaluated and mitigated.	
3.4.2.1.	If operating in a conflict-affected or high-risk area, the mine has committed to not support any parties that contribute to conflict or the infringement of human rights.	—
3.5.1.2.	The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel.	

### Principle 4: Environmental Responsibility

4.1.4.1.	A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities.	
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4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices.	
4.1.5.6.	The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities.	
4.1.8.1.	The mine does not use riverine, submarine or lake disposal for mine wastes.	—
4.2.4.1.a-e	Water quality and quantity are being monitored at the mine site	
4.2.4.4	and adverse impacts resulting from the mining operation are being mitigated.	
4.3.2.1.	When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan.	
4.5.1.1.	There is a policy being implemented that includes targets for reducing greenhouse gas emissions.	
4.6.2.1.	The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas	
4.6.4.1.	and these impacts are being mitigated and minimized.	—
4.6.5.3.	New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves	—
4.6.5.4.	and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized.	—
4.7.1.1.	Gold or silver mines using cyanide are certified as complying with the Cyanide Code.	—
4.8.2.2.	Mercury wastes are not permanently stored on site without adequate safeguards,	—
4.8.2.3.	are not sold or given to artisanal or small-scale miners and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories.	—

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## Questions & Answers

# IRMA audits of Anglo American's Amandelbult, Mototolo, Unki PGM mines

### Do IRMA audits certify these mining operations as “responsible”?

IRMA audits don't yield “certification”, nor do they declare at what point a site becomes a “responsible mine”. The IRMA system is built to facilitate transparent conversation about mine impacts, at a table where civil society and labor have voice equal to the private sector, and to create greater value to reduce harm.

In doing this audit, Anglo American volunteered their operations to be measured against a standard more rigorous, requiring more public engagement, and more transparent sharing of results than any other global standard. It is an act of leadership and commitment to increasing dialogue across diverse stakeholder sectors and with Indigenous rights holders.

IRMA doesn't use the word “sustainable” but rather brings attention to best practices for more responsible mining practices. The IRMA process also creates incentives for reducing waste, supporting a circular economy, addressing inequity in the use and benefits of mined materials, and supporting innovation that reduces the need for new extraction.

### What does IRMA Transparency mean? What do IRMA 50 and IRMA 75 mean?

IRMA Transparency means a mine has been independently audited against all relevant requirements in IRMA's Standard and has publicly shared its audit scores and the basis for auditors' findings. By sharing such extensive information, a mine provides diverse stakeholders with the information needed to understand the mine's operations and encourage improvement as needed.

IRMA 50 and IRMA 75 mean a mine has been independently audited and met 50% or 75% of the

requirements within each of the four principle areas of the IRMA Standard—business integrity, positive legacies, and social and environmental responsibility. [A mine receiving IRMA 50 or IRMA 75 must meet all of IRMA's critical requirements.](#)

### What are the next steps for Anglo American and for IRMA? What is the difference between Unki's surveillance audit and the other audits?

With this independent, third-party verified information, a new opportunity is created for a conversation between the mine, area residents, workers, customers, investors, and other stakeholders to explore priorities for improvement.

Anglo American's Amandelbult and Mototolo PGM operations in South Africa will need to be audited again in three years to maintain recognition in IRMA, with an interim surveillance audit in the next 18 months. The company can choose to have them audited sooner if it would like to demonstrate verified improvements more quickly.

Unki was fully audited in 2021 and achieved IRMA 75. This surveillance audit is an interim measure that serves to ensure that achievement level is still warranted – halfway between the one full audit and the next. Under normal circumstances the Unki surveillance audit would have occurred 1.5 years ago. Due to covid and other factors, IRMA has extended Unki's audit cycle.

## How does IRMA compare to other standards and how does achievement in IRMA differ?

IRMA's audit reports offer more independently verified information and insights into a mine's performance than any other system. The IRMA Standard requirements are detailed, specific and comprehensive, providing clear visibility into a mine's operations. This level of transparency is new for the industry and provides immense value for civil society, labor unions, investors, and purchasers alike.

A lack of specificity and clear reporting creates opacity and potential risks, as it becomes difficult to objectively assess which mine's operations truly align with best practice. Transparency is the first critical step toward the IRMA's ultimate goal: to drive improved practices in mining.

## If I have questions or feedback about this report, who do I contact?

If you have questions about the mining operations' practices, we encourage you to directly contact Anglo American Platinum's Head of Sustainability Stephen Bullock: [Stephen.bullock@angloamerican.com](mailto:Stephen.bullock@angloamerican.com).

IRMA engagement is increasing direct dialogue and information sharing between mining companies and diverse stakeholders and Indigenous rights holders.

If you have questions about the process that auditors followed or the evidence they reviewed for Amandelbult or Mototolo, contact the audit firm ERM CVS at [post@ermcvs.com](mailto:post@ermcvs.com), for Unki's surveillance audit contact SCS Global at [feedback@scsglobalservices.com](mailto:feedback@scsglobalservices.com).

If you have questions about the IRMA Standard and the metrics there for measuring mining company performance, or IRMA rules for auditing, or IRMA's governance, accountability or other aspects of how the IRMA system works, please [contact IRMA](#).

IRMA staff are dedicated to helping all stakeholders and Indigenous rights holders get answers to questions related to this audit report. Please contact us if you need help getting answers to questions.

## What confidence can I have that the audit report is accurate?

The information in this audit report represents the work of an audit firm to measure a mining company's performance against IRMA's Standard for Responsible Mining. The Standard includes more than 400 requirements – it's more rigorous and detailed than any other mining standard in the world. It's also the only audit of large-scale mines that involves public notice and encouragement of workers and community members to participate in the audit.

Auditors review thousands of pages of documents shared by the company, spend several days on site of the mining operation, and speak with workers, community members and Indigenous rights holders without the company present. However, this does not mean all the information in the audit report is complete, accurate or represents the perspectives of all people. The IRMA system is new, mining companies are still learning expectations, auditors are still learning how to measure achievement, and IRMA leaders are working to improve in real time.

If you have questions or concerns that information in the report isn't accurate, or if you have information and opinions different than what you read here, we encourage you to contact IRMA to make it more accurate: <https://responsiblemining.net/feedback>

Companies participating in IRMA audits are sharing a broad range of information with more transparency than has ever been done. Their effort is a work in progress and will further improve as direct communication increases between mining companies and the people most affected by their operations.

## I'm a mining company contemplating doing an independent audit – if I do one, will civil society appreciate my effort, or just further criticize our work? Is this level of transparency going to be appreciated or just greater risk for us?

Trust is deeply broken between many mining companies and the stakeholders and Indigenous rights holders impacted by their operations. Key to building trust is sharing information, being responsive to concerns about impacts, and demonstrating timely responsiveness to community and worker concerns.

Changing the current context won't happen overnight. We appreciate the effort of companies voluntarily stepping forward during this time of change and uncertainty to increase sharing of information, making commitments to improve practices, and showing positive progress.

A voluntary initiative like IRMA can never replace the critical role of laws and government oversight. Increasingly, national governments and international institutions are seeking increased transparency in mineral supply chains, so an effort to engage in independent audits now can help companies to meet not only civil society and labor requests, but mandatory expectations for improved practices.

## Many stakeholders and Indigenous rights holders don't trust auditors or audit processes, broadly speaking. Could there have been "cheating" or inappropriate influence of auditors involved in this process?

IRMA and the two firms approved to do IRMA audits are aware of deep distrust of auditors and the audit process. In many cases, what has historically been described as "independent audits" are actually consulting work done by experts hired to serve a particular company. IRMA audits are different from these type of consulting contracts in several ways.

To date, IRMA has approved, trained, and worked closely with just two firms (Applications for new firms to join are now being accepted). While the mining company must pay for the costs of the audit, the right to do an IRMA audit is conferred by IRMA. IRMA can remove that right to audit if a firm has not met expectations in terms of competency, has not demonstrated freedom from conflict of interest, and is not working in service to the IRMA system and its

commitment to all stakeholders and Indigenous rights holders.

IRMA-approved audit firms must be accredited to ISO 17021 or a similar standard for third-party auditing and are required to meet several strict requirements associated with maintaining impartiality and managing conflict of interest. These include prohibiting such audit firms from also providing consulting or internal auditing services to a site being audited, requirements to assess risks to impartiality and procedures to protect against conflict of interest, and recommendations for prohibiting certain relationships for a period prior to providing auditing services. Accredited audit firms are assessed annually by their accreditation body, and management of conflict of interest is a key component of this assessment. Audit firms that fail to properly manage and preserve impartiality risk losing their accreditation and therefore their ability to provide third party auditing.

## Why would a mining company agree to do a rigorous audit like IRMA? Do they think they can control the process and influence auditors?

It's best to ask this question to each mining company engaged to hear their perspective. To date, the first mining companies engaging in IRMA audits have done so because their local community members have asked them, or a customer or investor has asked. Mining companies are evaluating which standards systems bring the greatest value for the time and effort to engage. While the IRMA process is more rigorous, which requires more time and financial investment to participate—and while the high-bar requirements don't yield an easy pass, mining companies are finding that this type of robust assessment is better informing the specific improvements sought by those most affected by their operations.

## How can governments/regulators use this report?

A voluntary initiative like IRMA will never replace, nor be as valuable, as the role that governments serve, and the laws they set which apply to all operators. Where mining companies have agreed to do an independent IRMA audit, they are often sharing information on performance beyond legal compliance. We encourage mining companies and their regulatory government agencies to communicate together about the information shared in the IRMA audit report.

IRMA staff offer our time in direct support to government staff who want to learn more about the IRMA Standard and cross-stakeholder definitions for best practices to drive more responsible mining practices. We support governments doing gap analysis work to measure where IRMA goes beyond regulatory structure.

## How can purchasers of mined materials, like a car maker, or investors in mining companies use, these audit reports? What can companies buying materials from this operation say about their sourcing?

Purchasers of mined material, and investors in mining companies, can use IRMA audit reports to better understand environmental and social impacts at operations that supply materials they buy or companies in which they invest. We encourage purchasers and investors to take an in-depth look at audit reports to understand the scores and performance for each chapter. No voluntary initiative's results replace the expectations expressed by the OECD and other international institutions for purchasers and investors to do their own due diligence to understand risks in the supply chain and to be active participants to reduce harm.

In being audited, Anglo American and other companies doing IRMA audits are sharing with purchasers, investors, workers, and civil society metrics on their performance for more than 20 different areas of impact. This means that interested readers can understand more, and ask for further insights, so that performance isn't just about single issues like greenhouse gas emissions, or worker health and safety, or protecting water resources—but can be evaluated against a comprehensive range of issues relevant for large-scale mining.

As purchasers and investors learn more about mining companies' operations, they can encourage sites to

further share information on impacts, seek context and ask for improvement in areas of challenge, and value areas of strong performance. They can appreciate the effort Anglo American has made to be audited and can encourage further dialogue between the company and its stakeholders and Indigenous rights holders.

In terms of specific sourcing claims, IRMA has a new draft Chain of Custody Standard which when finalized will provide a way to independently audit a purchaser's supply chain and ensure claims of responsible sourcing can be verified.

## For more information

IRMA Amandelbult audit page:  
<https://responsiblemining.net/amandelbult>

IRMA Mototolo audit page:  
<https://responsiblemining.net/mototolo>

IRMA Unki audit page:  
<https://responsiblemining.net/unki>

Aimee Boulanger, Executive Director  
Initiative for Responsible Mining Assurance (IRMA)  
[contact@responsiblemining.net](mailto:contact@responsiblemining.net)

Or visit [responsiblemining.net](https://responsiblemining.net)

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# Background

## IRMA's assessment process

### The IRMA independent mine assessment process

The Initiative for Responsible Mining Assurance (IRMA) oversees the only independent, comprehensive process for assessing individual mines' performance against an equally governed, consensus-based standard — the widely recognized IRMA Standard — and for measuring mines' subsequent progress in reducing social and environmental harm.

#### How the IRMA mine audit process works

- Audits against the IRMA Standard are conducted by third-party auditors who meet IRMA competency requirements and have received IRMA training.
- The rigorous IRMA process requires that those affected by a mine, including local community members and workers, must be given the opportunity to engage with the on-site auditing team and share their firsthand experiences and perspectives.
- An audit is announced in advance by IRMA and an IRMA-approved certification body. Prior to the on-site audit stage (see the step-by-step summary below), the certification body conducts additional outreach with affected parties.
- IRMA audits are in general conformance with established practices for independent audits (e.g., ISO 19011:2018 — Guidelines for Auditing Management Systems).
- In their evaluations, auditors apply scientific principles and professional judgment to reach evidence-based subjective interpretations. Auditors' judgments are based on the available facts, within the limits of existing data, scope of work, budget and timing.
- Audit evidence is sampled from available information, and therefore the audit process is subject to a measure of uncertainty. Any actions based on the audit conclusions should take this into consideration.

#### Steps in the IRMA assessment process

- **A mine begins the voluntary IRMA process** by completing a self-assessment and uploading data to an evidence-compiling tool on the IRMA website. When this self-assessment is complete, the assessment by third-party auditing firm can begin.
- **Stage 1** of the independent assessment is a desk review conducted by an IRMA-approved certification body, which assigns a team of auditors to review the self- assessment ratings and supporting evidence provided by the mine. During this stage, auditors may request additional information.
- **Stage 2** is the on-site visit, during which auditors make observations at the mine site, review additional materials and interview mine managers and workers, as well as affected community members, Indigenous rights holders and others.
- **Based on their observations**, interviews and evaluation of information gathered during Stage 1 and Stage 2, the auditors then determine how well the mine meets each of the relevant IRMA Standard requirements — i.e., fully, substantially, partially or not at all. The final decision on the mine's achievement level is made by the certification body.
- **Because this rigorous, transparent process is still evolving**, we encourage critical review of the initial audit results and welcome further insights from those directly affected by the audited mine's operations.

- **As the IRMA Standard is recognized** and adopted around the globe, these audits are helping to foster dialogue on potential further improvements between mining companies and those affected by their operations.
- **A global standard sets expectations** for the industry worldwide, discouraging operators from gravitating toward weaker regulatory environments. When leading purchasers of mined materials express consistent aims with regard to social and environmental responsibility, it sends a powerful message, encouraging governments to strengthen laws and oversight to better protect the environmental and social wellbeing of their citizens.

## IRMA recognizes four levels of achievement

**IRMA Transparency** applies to any mine that consents to an independent audit by IRMA-approved auditors and releases the results publicly.

**IRMA 50, IRMA 75 and IRMA 100** indicate progressively higher levels of performance against the IRMA Standard in its key areas of focus: Social Responsibility, Environmental Responsibility, Business Integrity and Planning for Positive Legacies.

For a complete description of the IRMA assessment process and achievement levels, please visit our website: [responsiblemining.net](https://responsiblemining.net).

## Providing feedback to the mining company or IRMA

- Any queries about audit results or complaints about the auditing process can be submitted via the complaints and feedback page of the IRMA website, which includes detailed guidelines on the Issues Resolution Process, as well as a Complaint Form.
- As part of the rigorous assessment process, IRMA team members are responsible for evaluating all complaints and must make impartial efforts to resolve them — with full and transparent documentation.
- Complaints related to the conduct of an audit should be directed to the auditing firm. Our website has contact details for all mines currently undergoing IRMA assessment.
- If you have questions or concerns about a specific mine's performance, we encourage you to contact the company directly. The best practices that inform the IRMA Standard include the expectation that participating companies will respond to, and build dialogue with, communities, workers, civil society, governments, customers and investors.
- If you wish to provide feedback or submit a general complaint about any aspect of the assessment process, you are welcome to contact IRMA anytime via the web-based Complaint Form or by sending a message to [issues@responsiblemining.net](mailto:issues@responsiblemining.net).
- For queries about the IRMA Standard and its requirements — what we're measuring and why — please contact [info@responsiblemining.net](mailto:info@responsiblemining.net).

### For more information

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Or visit [responsiblemining.net](https://responsiblemining.net)



# **MINE SITE ASSESSMENT PUBLIC SUMMARY REPORT**

MINE SITE

Amandelbult Complex

OPERATING COMPANY

Anglo American

COUNTRY OF OPERATION

South Africa

FEBRUARY 2024

# Acknowledgements

IRMA believes that third-party, independent audits are most credible when there is robust participation not only from participating mines, but also from workers and stakeholders, particularly those from affected communities.

Outside stakeholders are not remunerated for their participation, and willingly give their time to provide perspectives and information on mine site performance. IRMA would like to recognize Amandelbult Complex mine and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

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# Audit Details

<b>Name of Mine:</b>	Amandelbult Complex, Rustenburg Platinum Mine Ltd.
<b>Operating Company:</b>	RPM Ltd
<b>Mine Owner:</b>	Anglo American
<b>Country of Operation:</b>	South Africa
<b>Mined Material(s):</b>	Platinum, Rhodium, Gold and Chrome
<b># Employees / contractors:</b>	12,523 employees and 3,493 contract workers for mine activities and 1,495 contract workers for non-mining activities at the time of the audit.
<b>IRMA Audit Webpage</b>	<a href="https://responsiblemining.net/amandelbult">https://responsiblemining.net/amandelbult</a>
<b>Audit Type:</b>	Initial IRMA Verification Audit
<b>Audit Dates:</b>	Stage 1 Audit: 4 June – 1 July 2021 Stage 1.5 Virtual Audit: 30 November – 3 December 2021 Stage 2 Audit: 16 - 20 May 2022 Follow-up Assessment: 25 - 26 May 2023
<b>Audit Team:</b>	Philip Underhill – Lead Auditor Will Huggett – Auditor, Environmental, Health, and Safety Prenisha Chetty – Auditor, Environmental, Health, and Safety Andrew Mathewson – Auditor, Social Danielle Sanderson – Auditor, Social Maitshoko Tumane – Support and translation Malefa Moleme - Support and translation
<b>Audit Firm Declaration:</b>	<ul style="list-style-type: none"> <li>✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) as presented during the Stage 1 and Stage 2 audits.</li> <li>✓ The audit team members were deemed to have no conflicts of interest with the mine.</li> <li>✓ The audit team members were professional, ethical, objective, and truthful in conducting the audits.</li> <li>✓ The information in this report is accurate according to the best knowledge of the auditors that contributed to the report.</li> </ul>
<b>Scope of Audit</b>	The scope includes extraction concentration, and processing of ore, and mining-related waste disposal at Amandelbult's mine site, located in the Limpopo province, South Africa.
<b>IRMA Standard Version:</b>	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
<b>Certification Body (CB):</b>	ERM CVS
<b>CB Technical Reviewer:</b>	Karin Arnold
<b>Achievement Decision Date:</b>	16 February 2024
<b>Achievement Valid Until:</b>	15 February 2027 (contingent upon outcome of surveillance audit and continuous compliance with the IRMA independent audit processes)
<b>IRMA Reference Number:</b>	IRMA-STD-ERM-001-V-03447

# 1. Mine Site Overview

## 1.1. Overview of Location

The Amandelbult Complex is in South Africa's Limpopo province within the Thabazimbi Local Municipality and the Waterberg District Municipality. The operation is on the northwestern limb of the great Bushveld mineral complex. Limpopo is the northernmost South African province, lined by Zimbabwe to the north; Mozambique to the east; the provinces of Mpumalanga, Gauteng, and North West to the south; and Botswana to the west and northwest.

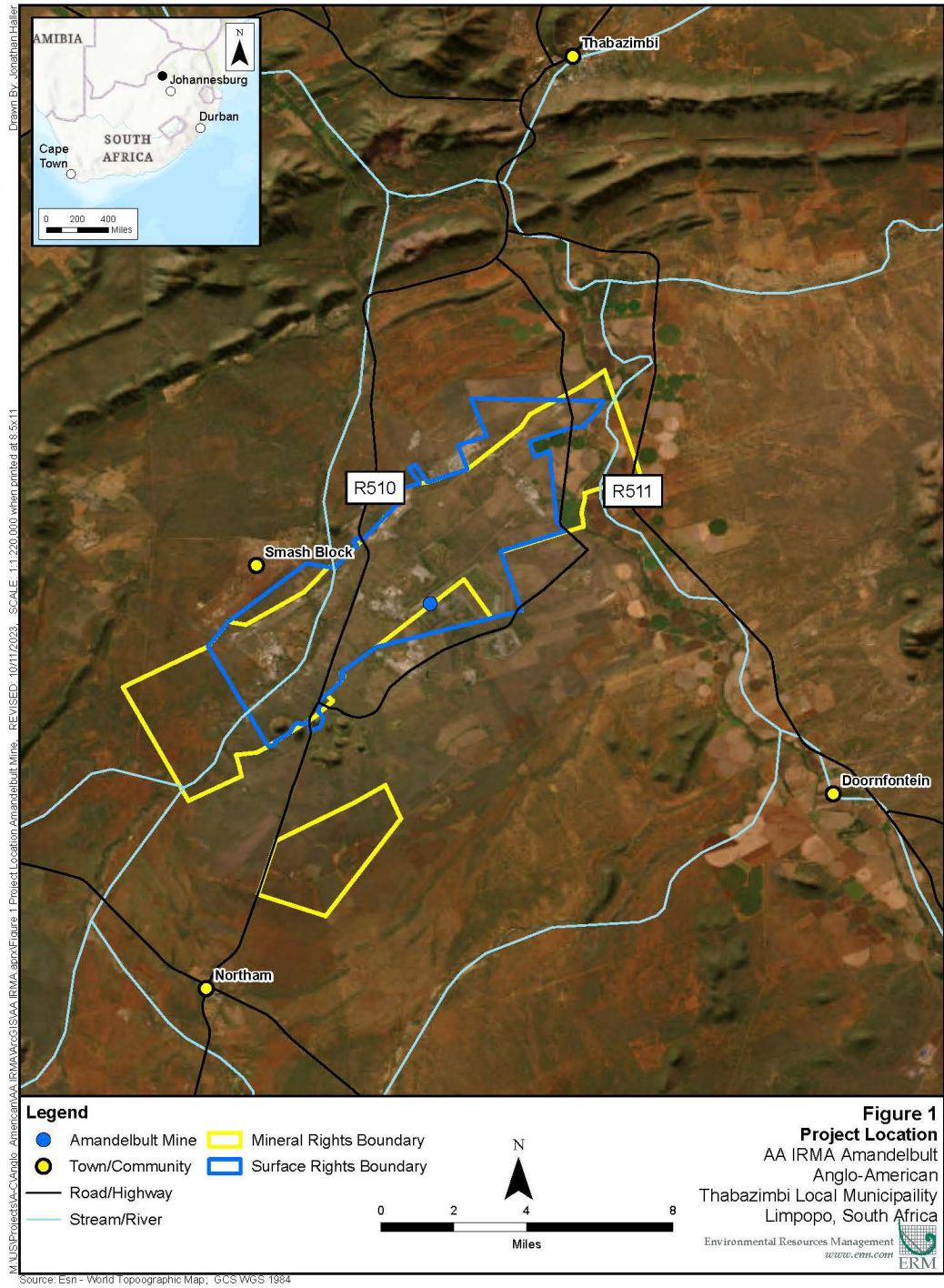
The Amandelbult Complex is surrounded by agricultural land and land used for game farming. The town of Thabazimbi, approximately 40 km north, is the closest economic hub with a population of roughly 2,850 (2011). The smaller town of Northam (2,380 people in 2011) lies 15 km south and Swartklip (3,520 in 2011) is 22km southwest of the mine. The Amandelbult Mine town has a population of 21,356 (2011) and covers 134.6 km<sup>1</sup>. (StatsSA, 2011). Smash Block is an informal settlement located just west of the Amandelbult Complex. The audit team notes that South Africa conducted a census in 2022, and at the time of this audit, the updated census results were pending. The updated census data will be reflected in future audit reports.

The Amandelbult Mine is 325 kilometers, or roughly a 4-hour drive to the closest airport, the Polokwane International Airport located just north of Polokwane in the Limpopo province.

The Limpopo province consists of vast plains and several mountain ranges rising out of the Highveld plateau in the south and center of the province. The nearest national parks are the Pilanesberg National Park, 50km southwest, and the Marakele National Park, 50 km northeast. Two water courses are situated near the project area, namely, the Bierspruit and the Crocodile River. The Madeleine Robinson Game Reserve, which is owned by the mine and managed as a wildlife sanctuary, is situated to the southwest of the Amandelbult Complex. The reserve covers approximately 1,490 Ha.

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<sup>1</sup> StatsSA, 2011, Statistics South Africa, 2011 Census.



Drawn By: Jonathan Haller  
 M:\US\Projects\AA-C\Anglo\_American\AA\_IRMA\ArcGIS\AA\_IRMA.aprx\Figure 1 Project Location Amandelbult Mine - REVISED - 10/11/2023 - SCALE: 1:1,200,000 when printed at 8.5x11

## 1.2. Overview of Operation

The Amandelbult Complex is wholly owned by Rustenburg Platinum Limited (RPM Ltd), which is wholly owned by Anglo American Platinum (a JSE listed company). The Amandelbult Complex comprises opencast and underground operations. Underground operations consist of a combined conventional and mechanized mining. There are four tailings storage facilities, three active and one inactive, for emergency deposition.

The Amandelbult Complex is divided into two separate mines, Tumela and Dishaba, both of which deliver ore to the Amandelbult Concentrator Complex. The Amandelbult Concentrator Complex, an aboveground processing infrastructure, consists of three concentrators, the UG2#1 and UG2#2 concentrators that treat UG2 reef, and the Merensky Concentrator that treats a mixture of Merensky and UG2 reef and opencast. The purpose of the concentrators is to mill the received ore to liberate valuable minerals from gangue, or waste. The valuable minerals are then subjected from the gangue to form a concentration from further downstream processing. During the process of flotation, the valuable mineral is chemically altered to render it hydrophobic. By sparging air through the milled slurry mixture, the valuable mineral attaches to an air bubble, which floats to the surface for collection.

In addition to the concentrators, four chrome modules are operated at the Amandelbult Concentrator Complex. These modules receive their feed from the individual concentrators through a network of processing options for chrome extraction. Chrome is extracted through spiral gravity separation, where differences in mineral densities are exploited to separate chromite, the mineral containing chrome, from other minerals. A high-grade chrome concentrate is produced, whereas the barren waste, commonly known as tailings, is discarded into a tailing storage facility.

In 2021, Amandelbult had 12,523 direct employees and 3,493 contract workers employed by the mine. An additional 1,495 contract workers were staffed to perform non-mining activities. The primary languages spoken by workers are Setswana, IsiXhosa, and English.

### 1.2.1. Scope of Activities and Facilities Included in Audit

The scope of this IRMA Assessment is for the Amandelbult Complex, including:

The mining operations:

- Two vertical shafts
- Four decline shaft systems
- One smack-scale opencast operation

Processing operations:

- Three platinum group metals concentrators
- Four chrome recovery modular plants
- The Kilken Scavenger Plant, an associated facility that processes the platinum group metals tailings stream.



## 2. Mine Site Assessment Process

### 2.1. Overview of IRMA Process

The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).<sup>2</sup> When the self-assessment has been completed, the independent, third-party assessment may begin.

Stage 1 of the independent, third-party assessment is a desk review carried out by an IRMA-approved certification body, which puts together a team of auditors to review the self-assessment ratings and evidence provided by the mine site. During this stage of the audit, additional information may be requested by auditors. Mines may also choose to take time to make improvements to practices prior to commencing Stage 2.

Stage 2 is the on-site visit, which includes facility and site-based observations; additional review of materials; interviews with mine site personnel, workers, and stakeholders; and meetings with affected communities.

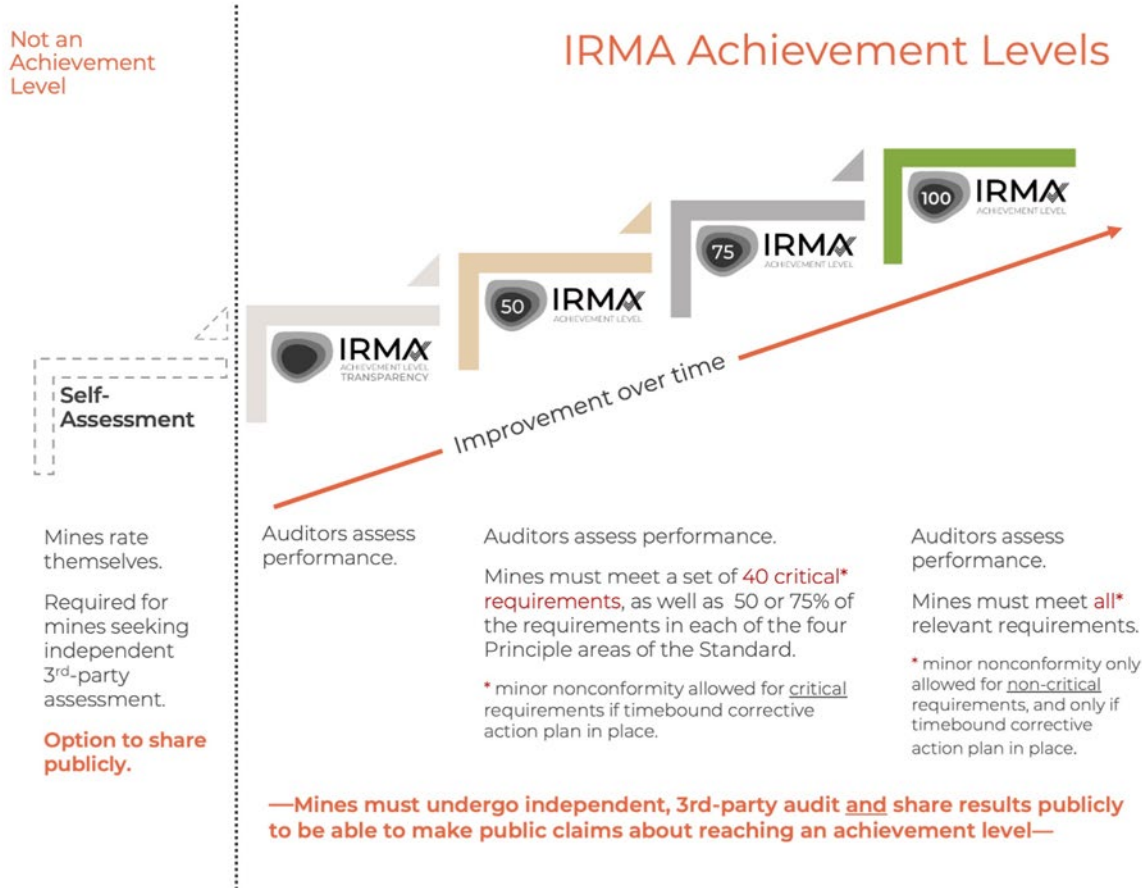
Based on observations, interviews and information evaluated during Stage 1 and Stage 2, auditors determine if mines are fully, substantially, partially, or not meeting all the IRMA Standard requirements relevant at the mine site. The decision regarding a mine site's achievement level is made by the certification body.

**IRMA recognizes four levels of achievement.** For a complete description of the assessment process and achievement levels, see IRMA's Assessment Manual for Mines, available on IRMA's website.<sup>3</sup>

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<sup>2</sup> <https://tools.responsiblemining.net/self-assess/>

<sup>3</sup> All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version of the Assessment Manual for Mines is available at <https://responsiblemining.net/resources/#independent-3rd-party-assessment>.



### 2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which external auditors assess mines against the IRMA Standard for Responsible Mining. These auditors have undergone IRMA training, meet IRMA competency requirements and have been deemed to have no conflicts of interest with the mine site under assessment.<sup>4</sup>

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).<sup>5</sup> In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

<sup>4</sup> See IRMA Certification Body Requirements, v.1.0, pp. 18-19, and Annex A. [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)

<sup>5</sup> See IRMA Certification Body Requirements, v.1.0, p 32. [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)

Auditor evaluations are based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed in auditor comments are based on the facts available at the time of the audit within the limits of the existing data, scope of work, budget, and schedule.

Audit evidence is based on samples of available information. Therefore, there is an element of uncertainty in auditing, and those acting upon the audit conclusions should be aware of this uncertainty.

### 2.1.2. IRMA Complaints Process

If any IRMA stakeholders wish to file a complaint related to the mine site assessment process, they may do so by visiting the IRMA website.<sup>6</sup> Details on the complaints process can be found in IRMA's Issues Resolution Procedure.<sup>7</sup>

## 2.2. Audit Process and Timeline

- Amandelbult completed the initial self-assessment for Amandelbult from April – May 2021.
- ERM CVS carried out an initial Stage 1 desktop audit between 4 June – 1 July 2021.
- ERM CVS carried out a limited scope virtual audit from 30 November – 3 December 2021, as the planned Stage 2 assessment could not go ahead due to disruptions caused by the COVID-19 Omicron outbreak.
- ERM CVS conducted a Stage 2 on-site audit on 16 - 20 May 2022.
- Amandelbult elected to use an IRMA-allowed early corrective action period to address certain shortfalls identified in the audit, which then required verification by ERM CVS.
- ERM CVS conducted a follow-up assessment from 25 - 26 May 2023 to verify Amandelbult's corrective actions.

The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, and governmental agencies (see Section 2.3); documentation review; and visits to operational areas (see Section 2.4) and communities, including the Moses Kotane Local Municipality and the SANParks – Marekele Nature Park.

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<sup>6</sup> IRMA website: "Complaints and Feedback." <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

<sup>7</sup> IRMA Issues Resolution System Procedure. Version 1.0. January 2020. [https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System\\_2020.pdf](https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf)

## 2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Audits are announced by IRMA and certification bodies, and prior to the on-site audit there is additional outreach carried out by certification bodies.

Thirty days prior to the on-site assessment, the Stage 2 Assessment was announced on the ERM CVS website, IRMA's website, and through IRMA's free email distribution newsletter. The announcement included an invitation to stakeholders to participate in the assessment. Further, ERM CVS prepared a similar announcement in Sepedi that was distributed via email to representatives in the surrounding communities and posted on the ERM CVS website. Community representative contact details were obtained from the Amandelbult stakeholder database. Amandelbult placed ERM CVS's announcement on community notice boards and sent it to local media to inform stakeholders about the audit and their opportunity to participate in the audit process.

### 2.3.1. Written comments/inquiries

ERM CVS did not receive any written comments or queries prior to or during the assessment. A written submission addressed to ERM CVS was submitted following the Stage 2 on-site audit. The key issues raised include the historical displacement of the Sebilong community, lack of employment and socio-economic benefits to the community, and accusations of the site not engaging with the community.

ERM CVS requested that the site provide a response to the queries raised by the stakeholders, as they related to historical forced resettlement and community benefits for that specific community.

The development of the Amandelbult operations required the resettlement of the Mantserre community residing on Farm Schilpadnest in 1963. In 1992, the Mantserre community lodged a land claim with the Regional Land Claims Commission in Limpopo Province. The negotiations involved the Mantserre leadership, without the involvement of the broader Baphalane Traditional Authority. The Mantserre community won restitution for the loss of their land and in this context entered a special relationship with Amandelbult, including the establishment of a Trust and payment in terms of a lease agreement. Against this background the relationship between the Mantserre and the Baphalane Traditional Authority has been strained, with the Baphalane Traditional Authority seeking legal opinion on their broader jurisdiction over the Mantserre community, and their rights in the context of the land restitution and its benefits.

The site was aware of the issues raised by the stakeholders and has been previously engaged with them. However, the stakeholder was not responsive to further meeting requests. The community benefits are included in the medium-term socio-economic development planning for the site (i.e., in the Social and Labour Plan required by national law over a 5-year implementation period). It was also noted by the site (and confirmed through stakeholder interviews and media publications) that ongoing political disputes over traditional leadership of local communities could play a role in the issues raised.

In terms of 1.2 Community and Stakeholder Engagement and 2.3 Obtaining Community Support and Delivering Benefits - the above issues and ongoing concerns from the stakeholder were accounted for through assessing the compliance of "Substantially meets" (e.g., IRMA Requirement 1.2.2.1 and 2.3.3.1.). Although there was a procedure and records of

engagement and opportunities in place, the communities provided evidence that the site's execution was not collaborative and inclusive.

### 2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit and included individuals from the Stage 2 and follow-up audits.

**Table 1. Mine Staff Interviews**

Position/Role
Human Resources Coordinator
Human Resources Manager
Legal Compliance
Permit Compliance
Permitting Manager
Geology Department Head
IRMA Independent Consultant
Communications Manager
Stakeholder Engagement Manager
Social Performance Specialist
Social Performance Manager
Strategic Engagement Principal
Protection Services Manager
Operational Risk Practitioner
Socio-economic Development Manager
Anglo American Platinum Corporate Financial Accounting Manager
Financial Accounting Manager
Revenue and Payments Transparency
Emergency Preparedness and Response
Emergency Preparedness and Response
Community Relations
Emergency Preparedness and Response
Planning and Financing Reclamation and Closure
Human Resources Coordinator
Human Resources Manager
Employee Relations Manager
Employee Relations Coordinator
Occupational Hygienist
Chief Ventilation Engineer
Senior Safety, Health, and Environment Manager
Senior HRD Practitioner

### 2.3.3. Workers/Contractors

During the Stage 2 assessment, ERM CVS conducted a total of 24 scheduled worker engagements, including 10 group interviews or focus groups (two to six people) with employees and contractors. Scheduled worker interviews were supplemented by additional impromptu interviews with individuals or groups in various mine work sites during the environmental, health, and safety portion of the audit process. ERM CVS selected workers to interview, and once interviewees were selected, Anglo American assisted with logistics to ensure that workers were available for interviews at the requested times and that the interview location was accessible to workers at the scheduled time of the interview. Interviews included employees and contractors from several different departments chosen to represent different age groups; genders; years of experience; work groups, and operational, administrative, health care or union responsibilities. Topics discussed included working conditions, with specific attention on women and vulnerable groups, freedom of association, health, and safety, etc. The engagements took place on-site at various locations in designated conference rooms and offices. The worker interviews were conducted without Anglo American management personnel present. Supervisory staff were interviewed individually; however, they did not participate in any group meetings so as not to bias or influence employee responses.

Site logistics created a barrier to meeting the IRMA expectation of 60 worker interviews (based on the size of the site) during the Stage 2 assessment. In planning for worker interviews the site provided auditors with a central location (a recreational / conference facility) for workers to report to. Unfortunately, this arrangement frequently served to “lock auditors in place” when workers failed to show up for their scheduled interviews. Logistical conflicts were also identified whereby above-ground and below-ground workers were scheduled for interviews without sufficient time to attend interviews. Shift work may also have been a barrier. In some instances it was unclear whether the coordination between Human Resources staff and supervisors was adequate to ensure workers were released from their duties and interviews scheduled actually occurred. This was further impacted by stringent social distancing restrictions due to the COVID-19 pandemic. These barriers were raised early in the Stage 2 audit process and to some degree affected both the worker and external stakeholder interview process.

Despite these constraints, every effort was made to maintain the integrity and rigor of the audit. The audit team will broaden their stakeholder sampling during the surveillance audit to ensure a comprehensive examination of relevant perspectives.

**Table 2. Worker Interviews**

Date	Meeting Type	Number of Attendees	Female/ Male	Group Type and Notes
16 May 2022	Individual Worker Interview	1	1 M	Worker
16 May 2022	Individual Worker Interview	1	1 M	Worker
16 May 2022	Worker Interview	2	2 F	Employees - Diesel Mechanic, Bartender
16 May 2022	EHS Assessment	1	1 M	Building Supervisor
17 May 2022	Individual Worker Interview	3	2 M 1 F	Junior Accountant, HR
17 May 2022	EHS Assessment	1	1 M	Environmental Officer
17 May 2022	EHS Assessment	1	1 M	Shift Supervisor
17 May 2022	EHS Assessment	1	1 F	ADT Operator
18 May 2022	EHS Assessment	1	1 M	Supervisor / Contractor – Lotus Mining
18 May 2022	EHS Assessment	1	1 M	Electrician / Contractor – Lotus Mining
18 May 2022	EHS Assessment	1	1 M	Contractor – Lotus Mining
18 May 2022	EHS Assessment	1	1 F	Process Operator
19 May 2022	Group Worker Interview	4	2 M 2 F	Protection Services
19 May 2022	Individual Worker Interview	1	1 M	Instrument Mechanic
19 May 2022	Group Interview	4	4 F	Women in Mining

ERM CVS facilitated a total of 12 scheduled individual worker engagements during the follow-up assessment in May 2023. The process to set up the follow-up worker interviews was the same as the process described above.

**Table 3. Worker Interviews – Follow Up Assessment**

Date	Meeting Type	Number of Attendees	Female/ Male	Group Type and Notes
25 May 2023	Individual Worker Interview	1	1 F	Assembler
25 May 2023	Individual Worker Interview	1	1 F	Operations
25 May 2023	Individual Worker Interview	1	1 M	Operations
25 May 2023	Individual Worker Interview	1	1 M	Artisan Assistant
25 May 2023	Individual Worker Interview	1	1 M	Cleaner

25 May 2023	Individual Worker Interview	1	1 M	Train Driver Assistant
25 May 2023	Individual Worker Interview	1	1 M	Rockdrill Assembler
25 May 2023	Individual Worker Interview	1	1 F	Train Drive Assistant
26 May 2023	Individual Worker Interview	1	1 M	Cleaner
26 May 2023	Individual Worker Interview	1	1 M	Carpenter
26 May 2023	Individual Worker Interview	1	1 F	Transport Clerk
26 May 2023	Individual Worker Interview	1	1 F	Driver

### 2.3.4. Government Agencies

ERM CVS conducted interviews with government agency representatives identified as having authority over or a relationship with Amandelbult. The interviews were conducted without Amandelbult mining personnel present. The interview with the Department of Mineral Resources was with one of the department's representatives responsible for mine inspections and reporting. The interview covered general Health Safety and Environment topics as well as external social topics related to the department's responsibilities. Municipality interviews included a range of participants including mayors, municipal managers, project managers and law enforcement representatives.

**Table 4. Government Agencies Interviews**

Government Institutions
Department of Mineral Resources
Thabazimbi Local Municipality
Bojanala Platinum District Municipality
Waterberg District Municipality

### 2.3.5. Participating Communities and NGOs

To identify stakeholders, interested and vulnerable groups, and key informants to interview during the on-site audit process, social specialists undertook a media scan, consulted with Amandelbult mine social performance team and other department managers, and reviewed the stakeholder database provided by the site. Prior to the on-site audit, ERM CVS social auditors corresponded with site managers and held virtual conferences to better understand the site's community relations and issues being encountered.

During the Stage 2 audit, Amandelbult provided an orientation vehicle tour of the area surrounding the Mine, including informal settlements and projects that had been supported by the mine. During the Stage 2 audit, ERM CVS conducted community meetings with several communities near the mine or with the potential to be impacted by the mine. The communities were selected based on the stakeholder mapping and the outcomes of the



Stage 1 audit. Meetings were held in or near the communities in meeting locations typically used by the community to facilitate ease of access. Where required, transport to meeting sites was provided by Amandelbult. Meetings were held in the locations identified below and varied in size with one to four community representatives, to discussions with more than ten participants. Communication and organization of the meetings was facilitated by Amandelbult mining personnel but were conducted by ERM CVS auditors without Amandelbult mining personnel present.

**Table 5. Interviews with the Representatives of Local Communities and NGOs**

Date	Community/NGO Name	Location	Total Number of Attendees
17 May 2022	Bakgalta Ba Kgafela Disability Organization	Mabodisa, Moruleng	2
17 May 2022	Baphalane-Ba-Ramokoka	Recreation Club, Amandelbult	1
17 May 2022	Agricultural Farming Community	Recreation Club, Amandelbult	12
17 May 2022	San Parks – Marekele Nature Park	Recreation Club, Amandelbult	2
17 May 2022	Law Enforcement	Recreation Club, Amandelbult	1
18 May 2022	Business and Employment Representative	Recreation Club, Amandelbult	1
18 May 2022	Traditional Authority and Unemployment	Recreation Club, Amandelbult	4
18 May 2022	Agricultural Groups	Recreation Club, Amandelbult	12
18 May 2022	Traditional Authority	Recreation Club, Amandelbult	4
18 May 2022	Hostels and Housing	Recreation Club, Amandelbult	6

## 2.4. Summary of Mine Facilities Visited

The following areas were visited or observed during the on-site visit:

**Table 6. Areas visited during the on-site audit**

General area	Description
Operational areas	Ponds, dams, and impoundments Tailings Process plant Waste / materials handling areas Mine – active shaft
Other areas visited (e.g., downstream watercourses, off-site facilities)	Managed habitat areas Medical services office Recreation club IH department Offices
Surrounding communities	Thabazimbi Sataria Village

## 3. Summary of Findings

Detailed audit findings on a requirement-by-requirement basis can be found in Appendix A.

### 3.1. Audit Outcome

The site is recognized as having achieved the level of IRMA 50 based on the performance recorded because of the Stage 1 and Stage 2 audit activities.

### 3.2 Scores by IRMA Standard Principle and Chapter

The table below provides a summary of the chapter-specific outcomes, and overall average scores per principle. Note, these scores are weighted based on the number of relevant requirements in each chapter.

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
<b>Principle 1: Business Integrity</b>		<b>85</b>	<b>112</b>	<b>76%</b>
Chapter 1.1—Legal Compliance	Yes	14.5	16	91%
Chapter 1.2—Community and Stakeholder Engagement	Yes	20	30	67%
Chapter 1.3—Human Rights Due Diligence	Yes	17	24	71%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	17	22	77%
Chapter 1.5—Revenue and Payments Transparency	Yes	16.5	20	83%
<b>Principle 2: Planning for Positive Legacies</b>		<b>110</b>	<b>136</b>	<b>81%</b>
Chapter 2.1—Environmental and Social Impact Assessment & Management	Yes	51.5	58	89%
Chapter 2.2—Free, Prior and Informed Consent	No	-	-	-
Chapter 2.3—Community Support and Benefits	Yes	11.5	16	72%
Chapter 2.4—Resettlement	No	-	-	-
Chapter 2.5—Emergency Preparedness and Response	Yes	9	10	90%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	38	52	73%
<b>Principle 3: Social Responsibility</b>		<b>171</b>	<b>196</b>	<b>87%</b>
Chapter 3.1—Fair Labor and Terms of Work	Yes	55.5	64	87%
Chapter 3.2—Occupational Health and Safety	Yes	43	46	93%
Chapter 3.3—Community Health and Safety	Yes	17	22	77%
Chapter 3.4—Conflict-Affected and High-Risk Areas	No	-	-	-
Chapter 3.5—Security Arrangements	Yes	30	38	79%
Chapter 3.6—Artisanal and Small-Scale Mining	No	-	-	-
Chapter 3.7—Cultural Heritage	Yes	25.5	26	98%

<b>Principle 4: Environmental Responsibility</b>		<b>124</b>	<b>168</b>	<b>74%</b>
Chapter 4.1—Waste and Materials Management	Yes	40	54	74%
Chapter 4.2—Water Management	Yes	25	40	63%
Chapter 4.3—Air Quality	Yes	15.5	18	86%
Chapter 4.4—Noise and Vibration	Yes	13	16	81%
Chapter 4.5—Greenhouse Gas Emissions	Yes	13	14	93%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	17.5	26	67%
Chapter 4.7—Cyanide Management	No	-	-	-
Chapter 4.8—Mercury Management	No	-	-	-

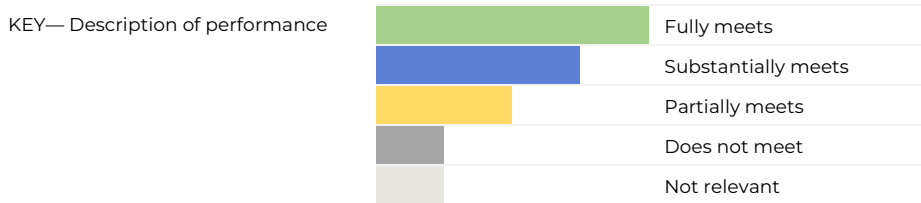
\* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials from ASM operations, then Chapter 3.6 would be marked as not relevant.

Chapters deemed “Not Relevant” do not factor into the principal scores.

### 3.3. Performance on Critical Requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve full certification (IRMA 100) must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

#### 3.3.1. Snapshot of Performance on 40 Critical Requirements









### 3.3.2. Performance on 40 Critical Requirements.

#### RATING LEGEND









Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

#### Principle 1: Business Integrity

1.1.1.1	The operating company shall comply with all applicable host country laws in relation to the mining project.	
1.2.2.2.	The mine fosters two-way dialogue and meaningful engagement with stakeholders	
1.3.1.1.	The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights.	
1.3.2.1.	and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships.	
1.3.3.3.	The operating company is taking steps to remediate any known impacts on human rights caused by the mine.	
1.4.1.1.	Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation.	
1.5.5.1.	The operating company has developed, documented, and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.	

#### Principle 2: Planning for Positive Legacies

2.1.3.1	The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project.	
2.2.2.2.	New mine sites have obtained the FPIC of indigenous peoples, and existing mines either have obtained FPIC or can demonstrate that they are operating in a manner that supports positive relationships with affected indigenous peoples and provides remedies for past impacts on indigenous peoples' rights and interests.	
2.4.7.1.	If resettlement has occurred, the mine monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met.	
2.5.1.1.	All operations related to the mining project shall have an emergency response plan	
2.5.2.1.	and there is community participation in emergency response planning exercises.	
2.6.2.1.	Reclamation and closure plans are compatible with protection of human health and the environment,	
2.6.2.6.	and are available to stakeholders.	
2.6.4.1.	Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring).	

### Principle 3: Social Responsibility

3.1.2.1	Workers' freedom of association is respected.	
3.1.3.3.	Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	
3.1.5.1.	Workers have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to workplace-related issues.	
3.1.7.2.	No children (i.e., persons under the age of 18) are employed to do hazardous work	
3.1.7.3.	and no children under the age of 15 are employed to do non-hazardous work.	
3.1.8.1.	There is no forced labor at the mine site or used by the operating company.	
3.2.4.1.a, b	Workers are informed of hazards associated with their work, the health risks involved and relevant preventive and protective measures.	
3.3.1.1.	The risks to community health and safety posed by the mining operation are evaluated and mitigated.	
3.4.2.1.	If operating in a conflict-affected or high-risk area, the mine has committed to not support any parties that contribute to conflict or the infringement of human rights.	—
3.5.1.2.	The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel.	

### Principle 4: Environmental Responsibility

4.1.4.1.	A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities.	
4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices.	
4.1.5.6.	The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities.	
4.1.8.1.	The mine does not use riverine, submarine or lake disposal for mine wastes.	—
4.2.4.1.a-e	Water quality and quantity are being monitored at the mine site	
4.2.4.4	and adverse impacts resulting from the mining operation are being mitigated.	
4.3.2.1.	When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan.	
4.5.1.1.	There is a policy being implemented that includes targets for reducing greenhouse gas emissions.	
4.6.2.1.	The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas	
4.6.4.1.	and these impacts are being mitigated and minimized.	—
4.6.5.3.	New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves	—
4.6.5.4.	and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized.	—
4.7.1.1.	Gold or silver mines using cyanide are certified as complying with the Cyanide Code.	—
4.8.2.2.	Mercury wastes are not permanently stored on site without adequate safeguards,	—

4.8.2.3.

are not sold or given to artisanal or small-scale miners and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories.

—



## 4. Next Steps

### 4.1 Corrective Action Plans

In the IRMA system, mines are allowed a 12-month corrective action period if they are interested in addressing non-conformities with critical or other requirements to reach a higher achievement level or gain recognition for improved performance. This enables them to implement changes and have them verified by auditors without waiting until the surveillance or recertification audit.

Following the Stage 2 Assessment, the Amandelbult Complex prepared a corrective action plan to address major non-conformities with critical and other requirements, with the goal of improving their overall achievement level. ERM CVS conducted a follow-up assessment to verify the implementation of corrective actions to improve performance against the Critical Requirements in May 2023. The findings of the follow-up assessment are included in this report.

Amandelbult's current corrective action plan to address additional areas of performance, with the goal of improving performance during the audit cycle, is provided as Appendix B.

### 4.2 Disclosure of Summary Audit Report

To maintain good standing in the IRMA system, IRMA requires that all mines that undergo independent, third-party auditing disclose a summary audit report within 12 months of an audit.

Amandelbult's public audit report will be posted on the IRMA website. Amandelbult will work with IRMA to make a coordinated press release with the Stage 2 audit results.

### 4.3 Timing of Future Audits


The IRMA system is a 3-year cycle, meaning that an operation goes through a formal reassessment every 3 years, with an interim surveillance assessment required within 18 months of each formal reassessment. Amandelbult's surveillance audit will take place no more than 18 months after the initial IRMA assessment report is published (this assessment).

# APPENDIX A—Results by Requirement

## Principle 1: Business Integrity

RATING LEGEND  
Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant


Requirement #	Requirement Text	Rating	Basis for rating
Chapter 1.1—Legal Compliance			
1.1.1.1.	<b>Critical</b> The operating company shall comply with all applicable host country laws in relation to the mining project.		<p>The SHE way is Anglo American’s Safety, Health and Environmental Management System which are based on the principle of continuous improvement, is consistent with the clauses as outlined in the Occupational Health and Safety Management System (ISO 45001:2018), Environmental Management System (ISO 14001:2015) and strives to comply with all requirements of South African Environmental, Health and Safety legislation.</p> <p>Since the Stage 2 audit, Amandelbult has been developing management plans to assist in assigning the various tasks associated with compliance and management system obligations.</p> <p>The intent of the plans is to cover all aspects of various projects that the mine is intending to undertake, which includes (not limited to) budget, timeline, and personnel and further outlines the steps that the team will use to achieve a</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>shared objective (compliance to the Water Use Licence conditions). Reference documents provided for review: Water Contamination study Action Plan 2023ss (version 1), dated 02 May 2023.</p> <p>Corrective actions were implemented to address the non-conformities identified during the Stage 2 on site assessment. The majority of these corrective actions that were identified by the mine have been completed, but the remaining actions will be implemented in phases due to budgetary constraints.</p>
1.1.2.1.	The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law, then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.	✓	No evidence of any conflict in terms of Amandelbult meeting IRMA requirements and South African legislative requirements.
1.1.3.1.	If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring.	✓	No evidence of any conflict in terms of Amandelbult meeting IRMA requirements and South African legislative requirements.
1.1.4.1.	The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project.	⊕	<p>Contracts contain requirements to comply with regulations and permits, in addition to the full suite of Anglo American policies, including polices related to sustainable development, anti-corruption, etc. The assessment was conducted to determine whether additional specific requirements may be required. Permits typically require that conditions are communicated to all applicable persons, including contractors. Further plans include a new permitting and contracting strategy that is currently being developed at the corporate level. A visit to the contractor waste storage and salvage yard highlighted inadequate waste management practices (legal requirements as well as Anglo American Group Standards). While a contract is in place for the waste management contractor, poor enforcement of Anglo American Platinum's standards was evident at the contractor site.</p>

Requirement #	Requirement Text	Rating	Basis for rating
			Contractor non-compliance to South African legal requirements, Anglo American Group Standards and Amandelbult's site specific requirements has the potential to impact Amandelbult's compliance status. The site does not assess contractors on a frequent enough basis, commensurate with risk and compliance obligations, to demonstrate full conformance as part of their contractual obligations.
1.1.5.1.	The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard.	✔	The permit register and electronic copies of permits are maintained in software databases, including Enablon and Isometrix. Actions resulting from non-conformances are recorded and tracked in these systems. Project management includes a permit identification and compliance verification process. Permit review is based upon a risk-register to determine review frequency. The site conducts focused audits on areas and topics, for example environmental, health and safety compliance. Internal and some external third-party reviews are also conducted that include contractor operations and service providers.
1.1.5.2.	Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies.	✔	The assessment team was provided with copies of compliance audit reports. In addition, a review of actions documented in Isometrix and Enablon was undertaken by the audit team during the on-site assessment. No issues were noted.
1.1.5.3.	Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available.	✔	External environmental audits for all the environmental authorizations are undertaken. The audit reports are published for public review on the company website with respect to Regulations 34(6)(a)(b). The site noted to the IRMA assessment team that any other reports will be made available to public enquirers upon request.
1.1.5.4.	Where the operating company claims that records or documentation contains confidential business information, it shall: A. Provide to auditors a general description of the confidential material and an explanation of the	✔	Confidential information is limited and has generally not been requested. The organization adheres to the new South Africa Protection of Personal Information Act.




Requirement #	Requirement Text	Rating	Basis for rating
	<p>reasons for classifying the information as confidential; and</p> <p>B. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information.</p>		
<b>Chapter 1.2—Community and Stakeholder Engagement</b>			
1.2.1.1.	<p>The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders, and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities.</p>	✔	<p>The 2021 Stakeholder Engagement Plan has been updated to reflect current stakeholders and analysis, including an update of stakeholder mapping and analysis, including area of influence. It illustrates progression in terms of broader stakeholder engagement and collaboration.</p> <p>The 2021 Stakeholder Engagement Plan has not been finalized due to the need for stakeholder engagement, which has been delayed due to COVID-19 and internal community conflict.</p>
1.2.1.2.	<p>A stakeholder engagement plan scaled to the mining project’s risks and impacts, and stage of development shall be developed, implemented, and updated as necessary.</p>	⊕	<p>The 2021 Stakeholder Engagement Plan is robust and includes links to the Social and Human Rights Impact and Risk Analysis vulnerability assessment and set up of the Community Engagement Forum. A number of elements, specifically the Community Engagement Forum, however had not been implemented at the time of the audit.</p>
1.2.1.3.	<p>The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive, and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups).</p>	⊕	<p>Stakeholders inform the stakeholder engagement process, through ongoing consultation. The site team indicated they ask for and receive feedback on how well information is communicated by the site. And this feedback is used to update processes to ensure a wider and more inclusive engagement and information sharing process. Several barriers are still, however, in place as some channels of communication are not always effective, and communities indicated that they do not get timeous responses on the grievances. Staffing and stakeholders inform the stakeholder engagement process, through ongoing consultation. The site team indicated they ask for and receive feedback on how well information is communicated by the site. And this feedback is used to update processes to ensure a wider and more inclusive</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>engagement and information sharing process. Several barriers are still, however, in place as some channels of communication are not always effective, and communities indicated that they do not get timeous responses on the grievances. The staffing constraints on site, together with the large and socially and politically complex area of influence, means that there is ongoing difficulty with accessing all stakeholders and specifically vulnerable groups.</p>
1.2.1.4.	<p>The operating company shall demonstrate that efforts have been made to understand community dynamics to prevent or mitigate community conflicts that might otherwise occur because of company engagement processes.</p>	✔	<p>An external consultant was appointed to better understand community histories and current dynamics. Stakeholders are engaged separately where known conflicts exist, or neutral venues are used.</p> <p>A community-level baseline survey (with elders and individuals) was completed as part of the Integrated heritage Management Plan study in 2018, and ongoing consultation with leadership forums provides insight into current socio-political issues, allowing the mine to ensure that engagement is carried out in a manner that is not exclusionary or could create conflict.</p> <p>Ongoing internal community conflict has prevented certain mine procedures from being implemented. Conflict between and within communities relates to conflict over traditional leadership rights, separation of communities or groups from traditional leadership structures (forming new social or community-level groups to represent their interests away from traditional structures) and competition for employment and benefits from the mine. As a result of these conflicts, the site cannot easily set up a Community Engagement Forum, as certain groups or individuals cause disruption or will not attend, and different groups are competing to represent the same communities. Stakeholder engagement is therefore sometimes implemented through engagement with different groups, which also causes concern that different groups are being told different information. There is also a distortion and interruption of information shared with leadership resulting in community dissatisfaction with the site.</p>
1.2.2.1.	<p>Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning)</p>	●	<p>Engagement is ongoing and undertaken through several platforms, including quarterly meetings with the Leadership Development Forum, (since 2015); however, it was not filtering through to all stakeholders, nor providing an "open-door" approach, where stakeholders can meet with the social performance team without an appointment. They are also in the process of implementing the Community Engagement Forum, which includes broader groups (including women, unemployed, youth, etc.)</p> <p>Although more evidence is required to meet the fully meets rating, it is clear from the evidence that the engagement is ongoing. However, a consolidated</p>





Requirement #	Requirement Text	Rating	Basis for rating
			<p>database of engagement undertaken to date is not in the 2021 Stakeholder Engagement Plan or readily available.</p> <p>A consolidated list of/evidence of all stakeholder engagement undertaken to date is not provided to demonstrate consistency in engagement.</p> <p>More evidence is required such as meeting minutes and a grievance register.</p> <p>Full implementation will only come with implementation of a future Stakeholder Engagement Plan.</p>
1.2.2.2.	<p><b>Critical</b> The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ul style="list-style-type: none"> <li>A. Providing relevant information to stakeholders in a timely manner;</li> <li>B. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;</li> <li>C. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;</li> <li>D. Soliciting feedback from stakeholders on issues relevant to them; and</li> <li>E. Providing stakeholders with feedback on how the company has taken their input into account.</li> </ul>		<p>Evidence provided shows that engagement was meaningful, and that discussion was informed by both the mine subject matter experts as well as attending stakeholders. Two way communication between stakeholders and the site is evident in the examples provided. These included an indication of information shared including job opportunities, changes at the site operational activities, local spend and long term prospects. Information was provided by subject matter experts (e.g. GM) and stakeholders were given the floor to ask questions, make comments and provide their opinion in a free and informed space. The level of meaningful engagement appears to be limited based on stakeholder interviews (e.g. lack of feedback, poor implementation of projects).</p> <ul style="list-style-type: none"> <li>a. Interviews indicated that stakeholders, specifically the Leadership Development Forum, are informed quarterly, and other mediums are used, including community radio, bulletin boards, monthly newsletters, and ad hoc meetings, all in relevant languages as much as possible.</li> <li>b. Interview - relevant management and technical specialists are made available for specific community engagement meetings or to resolve grievances.</li> <li>c. Minutes of meetings indicate that the meetings with stakeholders are held in a respectful manner, including an opening prayer and protocol for traditional and community leaders present. The site team facilitates these meetings openly, without undue interference (unless safety is a concern).</li> <li>d. Specifically in Leadership Development Forum meetings, leaders are asked to provide feedback from constituents. This forum comprises traditional and community leadership separate from the Community Engagement Forum, as</li> </ul>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>the latter was not established at the time of the audit due to ongoing internal community conflict.</p> <p>* Note: The Leadership Development Forum was in the process of being replaced with the Community Engagement forum (to align with Anglo Social Way 3.0), but due to difficulties (political and social) setting up the forum, and “Accountability Forum” was established in the interim comprising leadership from communities, traditional and government structures.</p> <p>e. Responses to grievances raised by stakeholders are provided via phone call, email or in person (as applicable to the individual/group). Communities acknowledge that they receive some feedback, but for the general stakeholder, the information is often not fed back to them by leaders, or they deny receiving feedback. It should be noted that the denial of receiving timeous feedback could not be confirmed, as the site team tracks all feedback, but the complexities and political dynamics within communities may mean that information is not disseminated, or that the response was not acceptable to the stakeholder/s.</p> <p>The evidence provided shows that the engagement was meaningful, and that the discussion was informed by both the mine subject matter experts and the attending stakeholders. Two-way communication between stakeholders and mine in both examples is provided.</p> <p>The information shared included job opportunities, changes at the mine, local spending, and long-term prospects. Information was provided by subject matter experts (e.g., GM), and stakeholders were given the floor to ask questions, make comments and provide their opinion in a free informed space.</p> <p>Although more evidence is required to meet the fully meets rating, it is clear from evidence that engagement is ongoing. However, a consolidated database of engagement undertaken to date is not in the Stakeholder Engagement Plan or readily available.</p>
1.2.2.3.	The operating company shall collaborate with stakeholders, including representatives from affected communities to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project’s environmental and social performance, and/or input to the company on issues of concern to stakeholders.	⊕	<p>The Stakeholder Engagement Plan and mechanisms to engage and collaborate with stakeholders are in place and encourage input from all stakeholders.</p> <p>The ongoing engagement with the Accountability Forum (*see note in 1.2.2.2 above) and preliminary Community Engagement Forum meeting (a precursor to setting up the Community Engagement Forum), as well as the open-door policy demonstrate that the site is seeking to work collaboratively with stakeholders.</p>



Requirement #	Requirement Text	Rating	Basis for rating
			<p>The ongoing issues with implementing the Community Engagement forum and representation of host and doorstep communities has prevented full implementation and cooperative engagement at the time of the audit. Therefore there was limited evidence of collaboration on developing engagement mechanism; however there was evidence of ongoing engagement and progress. Further evidence is needed on the implementation of the revised Stakeholder Engagement Plan and Community Engagement Forum in 2022 to reach substantially or full compliance.</p>
1.2.2.4.	<p>Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives.</p>		<p>Most of these mechanisms are, only easily accessible by non-marginalized groups, and there is limited evidence of inclusion of vulnerable groups, such as women, elderly, and migrants. Only disability and youth groups are listed on the stakeholder list.</p> <p>One mechanism that may be more accessible to vulnerable and marginalized groups, although only conducted periodically, is the perceptions survey (conducted directly with individuals via telephone and SMS text).</p> <p>A revised Stakeholder Engagement Plan includes vulnerability and household surveys that will provide a basis for developing a better engagement through the Community Engagement Forum when implemented in 2022. Further evidence of implementations required to reach full compliance.</p>
1.2.2.5.	<p>When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community.</p>		<p>The Leadership Development Forum / Accountability Forum is the key engagement platform currently. This comprises leadership representatives from communities and government but excludes vulnerable and marginalized groups and does not filter down to all the communities. The Community Engagement Forum will provide broader engagement when implemented in 2022.</p> <p>Previously, roadshows provided good engagement opportunities; however, these were stopped due to COVID-19.</p>
1.2.2.6.	<p>The operating company shall document engagement processes, including, at minimum, names of participants, and input received from, and company feedback provided to stakeholders.</p>		<p>Attendance registers with names, contact details, and gender, and comprehensive meeting minutes taken for all meetings are in evidence. Company feedback to stakeholders was not available.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.2.2.7.	The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes.	⊕	<p>Issues raised are reported back via Leadership Development Forum / Accountability Forum meetings, calls or emails directly to stakeholders or representatives (as appropriate).</p> <p>The mine provides "on the spot" resolutions to issues or concerns raised in meetings.</p> <p>All material issues raised at meetings and through the grievance mechanism are logged as grievances on the Enablon (internal) system and are required to be closed out within recommended timeframes. The Enablon (now Isometrix) system was viewed, and evidence provided; however, evidence to demonstrate closure of a grievance is not available for all grievances. And stakeholder engagement reflected that communities were not satisfied with the feedback, and indicated it was not timeous or helpful when they did receive it. It should be noted that it was not possible to track all grievances or their closure to the satisfaction of stakeholders within the audit. Better records and evidence are required.</p>
1.2.3.1.	The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring, and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement.	⊕	<p>The Leadership Development Forum / Accountability Forum is the key engagement platform at the time of the audit. This forum is used to build the capacity of stakeholders, particularly local receiving communities, by giving them a social agency. In addition to this, the site has, through its Social and Labor Plan and socioeconomic development initiatives, continued to promote capacity-building opportunities for both internal and external stakeholders, including leadership development. Communities are engaged in socio-economic development initiatives, from identifying planning, and implementation. Evaluation of effectiveness is sometimes carried out, however socio-economic initiatives are often predicated on municipal or other priorities, and not solely on local community requests.</p> <p>There is no evidence on community monitoring, or assessment of the communities' ability to engage effectively (beyond the site managing and responding to grievances raised). And ongoing leadership and political conflict affect the effectiveness of engagement and the ability of the site to respond. Further evidence is required to reach substantial compliance.</p>
1.2.4.1.	Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request unless the operating company deems the request to be unreasonable or the information requested is	—	There has been no publication of performance against IRMA standard, as this is the first time the site has been through the audit process, there was no information to publish.

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	legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information.		
1.2.4.2.	If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested.		Several Anglo American internal reporting documents are not for public consumption. However, where information is requested, the mine has adapted information contained in these reports and shared it with stakeholders. Where it is not shared as a document, evidence suggests that when requested in meetings or open forums, the mine facilitator or representative provides responses where possible. Where not, it is not always clear if the stakeholder's question/information request is closed out. There is further evidence required on information requests and records; however the site interviews indicated that they made an effort to bring in relevant specialists or appropriate staff to explain confidential or complex subjects.
1.2.4.3.	Communications shall be carried out and information shall be provided to stakeholders in a timely manner, and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders		Policies demonstrate intent (Communication, Consultation, and Involvement procedure). Information is generally available in a format understood by all stakeholders (verbally communicated at meetings and in calls, and use of visuals and translated into local languages). However, stakeholder interviews indicated that information was not readily available to all stakeholders, and evidence is required.
1.2.4.4.	If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information.		There is evidence, for example communication on confidential decisions, which demonstrates follow-ups are made. However, requests on the issues raised and responded to and minutes from the Leadership Development Forum meeting show that queries were made but follow-up documentation or confirmation was not. As such, there are inconsistencies with the follow up and close out protocol.
<b>Chapter 1.3—Human Rights Due Diligence</b>			
1.3.1.1.	<b>Critical</b> The operating company shall adopt a policy commitment that includes an acknowledgement of		Evidence provided and supported by on-site interviews with managers (Human Rights Policy, induction and training materials and Responsible Sourcing

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	its responsibility to respect all internationally recognized human rights		Standard for Suppliers) demonstrate an implemented commitment to respect internationally recognized human rights.
1.3.1.2.	<p>The policy shall:</p> <ul style="list-style-type: none"> <li>A. Be approved at the most senior level of the company;</li> <li>B. Be informed by relevant internal and/or external expertise;</li> <li>C. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project;</li> <li>D. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders;</li> <li>E. Be reflected in the mining project's operational policies and procedures.</li> </ul>	✔	<p>The evidence provided indicates the Group Human Rights Policy has been approved at the highest corporate level. Employees and contract workers are made aware of the policy at induction and through various human rights related- training sessions provided generally (bullying, harassment and victimization and anti-gender-based violence) or to specific groups (Voluntary Principles on Security and Human Rights Policy and International Finance Corporation Performance Standards) provided by contracted subject matter experts. Management's expectations are made clear at induction and during training sessions. The policy is publicly available online and is reflected in operational policies and procedures (Contract Compliance Checklist). On-site interviews confirm community participation in Bullying, Harassment and Victimization and Gender-Based Violence campaigns.</p>
1.3.2.1.	<p><b>Critical</b> The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.</p>	●	<p>Evidence provided indicates sustained efforts to identify external risks and potential human rights impacts. The updated baseline Workplace Risk Assessment and Controls provided identifies a range of potential and primarily external human rights impacts and controls. The Significant Risks Monitoring and Measure assessment focuses on potential external risks to the site. A vulnerability assessment was conducted of surrounding communities. A full Social Way 3.0 Social and Human Rights Impact and Risk Analysis is planned. The site has implemented operating company training with respect to bullying, harassment, and victimization.</p> <p>However, interviews with workers and union representatives indicate the potential for human rights risks related to harassment and intimidation of contract workers. Interviewees also mentioned the potential for contract</p>

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			workers to be threatened with termination by their Business Partner employers if they were to indicate an interest in joining a union.
1.3.2.2.	<p>Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:</p> <ul style="list-style-type: none"> <li>A. Follow a credible process/methodology;</li> <li>B. Be carried out by competent professionals; and</li> <li>C. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders.</li> </ul>	✔	<p>Evidence provided indicates risk assessments were undertaken in 2016 and 2017 by competently trained internal subject matter experts, following the operating company's Workplace Risk and Control and Social and Human Rights Impacts and Risks methodologies. Social and Human Rights Impact and Risk Analysis and Project / Exploration and Operation Workplace Risk Assessment and Controls are currently in progress.</p> <p>Community members are involved in reviewing human rights risks and impacts through a Leadership Development Forum. A Community Engagement Forum is planned.</p> <p>On-site interviews confirm community grievances related to human rights are considered by the site, and incorporated into their human rights risk assessment to the extent that they relate to operational / security issues. The site has studied vulnerable populations and human rights issues therein, but the results of this vulnerability study have not yet been fully integrated into the sites.</p>
1.3.2.3.	<p>As part of its assessment, the operating company shall document, at minimum:</p> <ul style="list-style-type: none"> <li>A. The assessment methodology;</li> <li>B. The current human rights context in the country and mining project area;</li> <li>C. Relevant human rights laws and norms;</li> <li>D. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk;</li> <li>E. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and</li> </ul>	⊕	<p>The evidence provided indicates use of the operating company's assessment methodology and current human rights context in the country and project. Assessments undertaken to date have not included a comprehensive list of potential, perceived, or actual human rights risks but rather focus on those relating to security / protection services.</p> <p>The site has undertaken a vulnerability study that includes differential impacts on vulnerable groups. Mitigation measures for some human rights risks have been identified and discussed with stakeholders through a Leadership Development Forum. An updated Social and Human Rights Impact and Risk Analysis is in progress.</p>

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	<p>other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group;</p> <p>F. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues.</p>		
1.3.2.4.	At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them and shall be consulted to provide feedback on those findings.	⊕	<p>The evidence provided indicates that stakeholders and rightsholders were involved in reviewing findings of assessments through a Leadership Development Forum but were not active participants in the assessment process. An updated Social and Human Rights Impact and Risk Analysis is in progress. A Community Engagement Forum is planned.</p> <p>On-site interviews confirm there is some community participation in human rights risk and impacts identified and proposed mitigations.</p>
1.3.2.5.	The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level.	⊕	<p>Evidence provided indicates multi-layered efforts to integrate assessment findings into mine operations, including induction and onboarding materials, bullying, harassment and victimization, gender-based violence and International Finance Corporation performance standards training; implementation of panic buttons for women; and the Supplier Sourcing Standard.</p> <p>However, on-site interviews highlighted unidentified risks with respect to intimidation or bullying in the workplace relationship between the operating company's employees and contracted workers. Interviews also cited examples where business partners were not respecting contracted workers' rights to freedom of association.</p>
1.3.3.1.	Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights.	⊕	<p>Evidence provided demonstrates that both workers and community members have access to multi-platform grievance procedures that workers are made aware of through human resources personnel or union representatives and community members can access from newspaper advertising. Evidence provided indicates that workers and community members have and continue to lodge grievances periodically.</p> <p>On-site interviews with workers and community members indicated a general reluctance to use formal grievance procedures available. Contracted workers</p>

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			specifically reported they would not typically lodge grievances with the site or their business partner employers because of anticipated inaction.
1.3.3.2.	<p>Responding to human rights risks related to the mining project:</p> <p>A. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s).</p> <p>B. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks.</p> <p>C. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities.</p>	●	<p>The evidence provided demonstrates ongoing efforts to identify social and human rights risks as they related to mining related activities. An updated Social and Human Rights Impact and Risk Analysis is in progress. A Supplier Sourcing Standard and standardized human rights-related contract terms have been adopted. A Community Engagement Forum is planned.</p> <p>However, on-site interviews indicate human rights risks identified have emphasized operational security, not bullying, harassment, and victimization or gender-based violence related issues. Evidence of identification and mitigation of worker, community and supply chain-related risks was not provided.</p>
1.3.3.3.	<p><b>Critical</b> Responding to actual human rights impacts related to the mining project:</p> <p>A. If the operating company determines that it has caused an actual human rights impact, the company shall:</p> <ol style="list-style-type: none"> <li>i. Cease or change the activity responsible for the impact; and</li> <li>ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually</li> </ol>	●	<p>The updated Baseline Workplace Risk Assessment and Control provided identifies a range of potential and primarily external human rights impacts and controls. A full Social Way 3.0 Social and Human Rights Impact and Risk Analysis is planned. The site has mitigated potential human rights impacts through bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers.</p> <p>However, on-site interviews with workers and union representatives indicated the potential for human rights risks related to harassment and intimidation of contract workers. Interviewees also mentioned the potential for contract</p>





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	<p>acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders;</p> <p>B. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;</p> <p>C. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and</p> <p>D. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.</p>		workers to be threatened with termination by their business partner employer if they chose to join a union (the right to freedom of association).
1.3.4.1.	The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.	⊕	The evidence provided indicates that assessments of potential social and human rights impacts have been undertaken since 2016. Baseline data, to inform future assessments of human rights, was undertaken in 2021. A vulnerability study was commissioned. An operational risks plan was created. An updated Social and Human Rights Impact and Risk Analysis is in progress. A Supplier Sourcing Standard has been adopted and human rights are part of standard contract requirements for suppliers and business partners. Training for staff includes bullying, harassment and victimization and anti-gender-based violence. Select staff have also received Voluntary Principles on Security and



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			<p>Human Rights Policy and International Finance Corporation training. A Community Engagement Forum is planned.</p> <p>However, evidence that speaks to monitoring human rights risks is largely absent from risk assessments to date or was not provided with respect to supplier contract compliance. On-site interviews suggest monitoring of potential human rights risk and impacts has not included participation from external sources and rightsholders.</p>
1.3.4.2.	<p>External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse.</p> <p>Additionally:</p> <ul style="list-style-type: none"> <li>A. The company shall fund the external monitoring; and</li> <li>B. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders.</li> </ul>	—	<p>Evidence provided, supported by on-site interviews suggests that further assessment of monitoring of potential human rights risks and impacts within the workplace, communities and supply chain is warranted. An updated Social and Human Rights Impact and Risk Analysis is in progress. However, evidence provided, and on-site interviews do not suggest that the site has repeatedly failed to prevent, mitigate, or remediate actual human rights impacts that have been identified.</p>
1.3.5.1.	<p>The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts.</p>	⊕	<p>Evidence provided (Human Rights Due Diligence Report; Leadership Development Forum presentation) indicates the site has reported on some of its human rights risks and impacts identification and mitigation activities to stakeholder representatives in the past. A Community Engagement Forum is planned. On-site interviews indicate workers and stakeholders are aware of bullying, harassment and victimization and anti-gender-based violence training and campaigns.</p>
1.3.5.2.	<p>If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the</p>	—	<p>Evidence does not suggest requirement 1.3.5.2 applies to this site.</p>



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	operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities because of external monitoring recommendations.		
1.3.5.3.	Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization.	—	Evidence provided on the site's reporting activities and on-site interviews suggests that confidential business information was not included.
<b>Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy</b>			
1.4.1.1.	<b>Critical</b> The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.	✔	<p>There is a procedure in place that allows communities to raise their issues, complaints or grievances relating to operation, including a direct grievance raising platform, Your Voice (online, anonymous), an open-door policy, and leadership engagement.</p> <p>The process has been disseminated to the literate population as per evidence provided in the Amandelbult Times. Communities and stakeholders are advised regularly on the availability of telephone and in-person interactions. The Leadership Development Forum and ad hoc meetings with communities / stakeholders were also used to raise awareness.</p>
1.4.2.1.	<p>The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:</p> <p>A. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source</p>	●	<p>A new grievance mechanism is still under development, that will address all the sub-requirements of 1.4.2.1., which include:</p> <ol style="list-style-type: none"> <li>a. Integrating stakeholders into the design of the grievance mechanisms, and inclusion of improved learning through the Learning from Incidents (Lfi) process, and human rights aspects.</li> <li>b. Using the Enablon online system to track and resolve/manage grievances.</li> <li>c. Maintaining confidentiality where required.</li> <li>d. Appointing a third-party company to log anonymous grievances.</li> </ol>

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	<p>of continuous learning, and (h) Based on engagement and dialogue;</p> <p>B. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase;</p> <p>C. How confidentiality of a complainant's identity will be respected, if requested;</p> <p>D. The ability to file anonymous complaints, if deemed necessary by stakeholders;</p> <p>E. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups;</p> <p>F. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and</p> <p>G. How complaints and grievances and their resolutions will be tracked and recorded.</p>	●	<p>e. Building access for vulnerable (especially remote) people using an available hotline and an "open-door" policy where stakeholders can walk into the office to register a grievance.</p> <p>f. Implementing an appeals process (although an appeals panel still to be developed, including terms of references)</p> <p>g. Using the Enablon online system to record and file grievances.</p> <ul style="list-style-type: none"> <li>- In the process of establishing an appeals panel, including developing terms of references.</li> <li>- Tracking and recording: the Enablon management system is used to record and track complaints and grievances across the full spectrum of issues (but will be migrating to Isometrix)</li> <li>- The Leadership Development Forum session on 13 October 2022 was designed to incorporate all these sub-requirements. Minutes of the meeting and presentation material was reviewed and confirmed.</li> </ul>
1.4.2.2.	The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available.	●	<p>Policy and incident and grievance procedure was shared in the Amandelbult Times; however, the procedure is currently under review. The procedure was documented clearly in both pieces of evidence provided.</p> <p>An updated Stakeholder Engagement Plan and grievance mechanism is in place, but still needs completion through stakeholder verification on a broad level. (This was not completed due to COVID-19 and internal community conflict).</p>
1.4.3.1.	No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.	✔	<p>The evidence illustrates that stakeholders have taken judicial and other measures to resolve grievances confirming the site's policy that all other availed mechanisms for appealing grievance outcomes are available.</p> <p>Pg 9.1.6 of the 2021 Grievance Mechanism indicates: "As part of sites' response and overview of the grievance process, complainants should be informed of alternative avenues available to them. These might be state-based (judicial or nonjudicial) or non-state-based (trade unions). Allegations of a criminal nature must be referred to the relevant authority."</p>

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1.4.4.1.	Complaints and grievances and their outcomes and remedies shall be documented.		<p>Interviews indicated the Enablon system is used to track, manage, and file grievances. Needed to see system / examples as evidence.</p> <p>Page 12 Section 9.2.4 of the Issue and Incidents Procedure points out the classification process and that all the issues/ complaints or grievances, and their remedies must be logged on Enablon Evidence on Incidents and grievance records.</p> <p>The Enablon report and the Social Performance Incident and Grievance Report documents grievances received, and the outcomes / resolutions reached.</p>
1.4.4.2.	<p>The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine:</p> <p>A. If changes need to be made to improve its effectiveness as per 1.4.2.1.a;</p> <p>B. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and</p> <p>C. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights.</p>		<p>Currently monitoring is done through the Leadership Develop Forum meetings and updated through move to SW3. This process is not regular or formalized yet.</p> <p>Interviews provided examples of how improvements are made through suggestions by the Leadership Development Forum (meeting minutes, 13 October 2021).</p> <p>A new grievance procedure will address monitoring effectiveness and updating but is not yet completed.</p>
1.4.4.3.	Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism.		<p>Monitoring of the grievance procedure is undertaken through meetings with stakeholders, requesting feedback on grievance processes. Within the SEP (2021) Section 7.3.2 (Roles and responsibilities) the Social Performance team is required to seek input from stakeholders on the grievance procedure.</p> <p>Therefore there are mechanisms in place to allow stakeholder opportunities to feedback to the site on the performance of the grievance procedure; however this is limited to leadership engagement and stakeholder who have raised grievances, and so is not a comprehensive process that allows for broader engagement and access (e.g. of vulnerable groups). Future re-instatement of improves stakeholder engagement mechanism (such as the Road Show) is anticipated to improve compliance.</p>
1.4.5.1.	The operating company shall take reasonable steps to inform all stakeholders of the existence of the		A procedure in place that allows communities to raise their issues, complaints or grievances relating to operation. The procedure / process has been



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	operational-level complaints and grievance mechanism, its scope, and its procedures.		<p>disseminated to literate population as per evidence provided in Amandelbult Times. Communities and stakeholders are advised regularly on the availability of through telephone and in-person interactions. The Leadership Development Forum / Accountability Forum is also used to raise awareness, as well as ad hoc meetings with communities / stakeholders. Other means include public bulletin boards, and information notices placed at community shops. Workers are notified through "news flashes" on site televisions.</p> <p>Evidence indicates that all reasonable measures are taken to inform stakeholders of the availability of the grievance procedure; however a number of internal and external stakeholders indicated that they were not aware of the procedure. .</p>
1.4.5.2.	The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial, or other non-judicial remedies.	☑	There is reference to third party escalation, but no detailed discussion of the right to other administrative, judicial, or other non-judicial remedies and how this would be triggered/accessed. However, there was no implication that the right to resolution is waived.
1.4.5.3.	The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous.	⊕	<p>A new procedure includes a screening tool to determine if a complaint/grievance is or isn't credible and how either must be handled. Engagement with contractors is planned, to ensure they are informed and trained in how to implement the Grievance Mechanism Procedure.</p> <p>There has been training from Anglo American Group to the Social Performance Team.</p> <p>Learning from Incidents training held during the week of 4-8 Oct 2022 was provided as evidence, including induction materials and minutes for contractors that undertake Stakeholder Engagement Plan actions.</p> <p>Evidence does not include/ describe how grievances should be channeled / managed by contractors (as per the Issues and Incident Mechanism).</p>
1.4.6.1.	Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances.	⊕	<p>Evidence provided demonstrates the process and communication but does not show the full cycle from grievance register through to closure / feedback.</p> <p>Evidence shows how some grievance outcomes are investigated and then responded to and reported back to affected stakeholders in a confidential manner, as per the Issues and Incident Mechanism.</p>



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			<p>The Enablon report demonstrates four examples of grievances registered with the operation and how they were resolved. These demonstrate in detail the immediate response provided to the grievant but does not demonstrate if this grievance was closed (i.e., grievant satisfied with response) and if the results of the grievance process were shared with the broader communities that the grievances involve (Northam Community / Mantserre Community).</p> <p>Additional evidence is required to demonstrate where grievances are communicated back to stakeholders (collectively or otherwise).</p>
<b>Chapter 1.5—Revenue and Payments Transparency</b>			
1.5.1.1.	<p>The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime.</p>	✔	<p>Financial Statement and Tax and Economic Contribution Report support the claim that Anglo American complies with EU Accounting and Transparency directives. Anglo American state that they comply with UK legislation which implemented the EU Accounting and Transparency Directives, as well as adhering to the updated Global Reporting Initiative (GRI) transparency standards, and Australian voluntary Tax Transparency Code. Documents list all regulations complied with, show tax paid in all jurisdictions and include signed commitments by the board and senior leadership.</p>
1.5.1.2.	<p>On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year.</p>	—	<p>As the company follows EU directives, this requirement should be "Not Relevant".</p>
1.5.1.3.	<p>The types of payment disclosed shall include as a minimum, as applicable:</p> <ul style="list-style-type: none"> <li>A. The host government's production entitlement;</li> <li>B. National state-owned enterprise production entitlement;</li> <li>C. Profits taxes;</li> <li>D. Royalties;</li> </ul>	—	<p>As company follows EU directives, this requirement should be "Not Relevant".</p>


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	<p>E. Dividends;</p> <p>F. Bonuses, such as signature, discovery and production bonuses;</p> <p>G. License fees, rental fees, entry fees and other considerations for licenses and/or concessions;</p> <p>H. Payments for infrastructure improvements; and</p> <p>I. Any other significant payments and material benefits to government, including in kind payments.</p>		
1.5.1.4.	At minimum, this information shall be broken down by recipient government body (where applicable), by project (where applicable), and by payment type.		<p>Details of breakdown by recipient government body (where applicable), by project (where applicable), and by payment type are not included in the provided documents, which are quite high-level and global.</p> <p>Taxes are paid at company (Anglo American Platinum) level and most information is rolled up to that level. Information is reported into Anglo American Platinum in London which then publishes the economic report.</p>
1.5.2.1.	The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below.		<p>Site representatives state that they legally must comply with Chapter 10 of the European Union Directive 2013/34/EU. A statutory audit conducted by Price-Waterhouse-Coopers includes a statement of compliance with the EU requirement. Publicly available 'tax and economic contribution reports' for 2021 and 2022 contained statements by Price-Waterhouse-Coopers that: "Since 1 January 2015, Anglo American has been subject to the project-by-project reporting requirements of the UK Reports on Payments to Government Regulations (SI 2014/3209) and Chapter 10 of the EU Accounting Directive (2013/34/EU). These rules require that the Group prepare and submit to Companies House, the UK registrar of companies, a full analysis of tax and certain other payments made to governments in respect of extractive projects on a project-by-project basis." This confirms the operating company's compliance with the requirement to make the specified reports, while making no statement about whether the content of the reports satisfies all the relevant requirements.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.5.2.2.	<p>The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:</p> <ul style="list-style-type: none"> <li>A. Mine production, disaggregated by product type and volume;</li> <li>B. Revenues from sales, disaggregated by product type;</li> <li>C. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department);</li> <li>D. Social expenditures, including the names and functions of beneficiaries;</li> <li>E. Taxes, tariffs or other relevant payments related to transportation of minerals;</li> <li>F. Payments to politicians' campaigns, political parties or related organizations; and</li> <li>G. Fines or other similar penalties that have been issued in relation to the project.</li> </ul>	—	<p>Environmental, Social and Governance Reports contain a limited amount of site-specific information but most of the reviewed Environmental, Social and Governance Reports do not contain disaggregated data. The Dow Jones report reportedly contains fully aggregated data.</p> <p>Company policy prohibits political payments. Social spending is summarized for all Anglo American Platinum in the Environmental, Social and Governance report but is not broken down by mine.</p> <p>Production (broken out into Platinum Group Metals), net revenue and social investment are broken down to Amandelbult level in the Integrated Annual Report, which also states that no fines were issued. There was no information available regarding transportation-related taxes.</p>
1.5.2.3.	The operating company shall publish annual accounts, following international accounting standards.	✔	Provided documents contain statements by Anglo American and external auditors confirming that published annual accounts (for 2020) follow international accounting standards.
1.5.3.1.	If the mining project is in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website.	✔	Reviewed documents clearly state: "We therefore support the Extractive Industries Transparency Initiative (EITI) and its efforts to allow citizens to see for themselves how their country's natural resources are being managed and how much revenue they are generating." This was also found on the website.
1.5.3.2.	If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall:	—	The company states that they commit to engage with and support the EITI. However, available evidence suggests that the EITI is not currently active in



Requirement #	Requirement Text	Rating	Basis for rating
	<p>A. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and</p> <p>B. Provide links on its external website to completed and up-to-date Company Forms for its operation, if the EITI implementing country has completed at least one validation.</p>		<p>South Africa. Therefore, although Anglo American is committed to supporting the EITI, this requirement should be considered “Not Relevant.”</p>
1.5.4.1.	<p>The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, except for confidential business information, in the national language(s) of the country in which the mining project is located.</p> <p>A. Where these terms are negotiated, rather than governed by law, the company shall make the relevant agreements, licenses or contracts freely and publicly accessible.</p> <p>B. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement.</p>		<p>The site provided documents as evidence which contained general commitments to financial transparency but did not contain information regarding material terms for mineral exploration, development, and production at Amandelbult. The mine stated that "No information provided regarding Anglo American's position on contract transparency." While they also noted that "Recent Extractive Industries Transparency Initiative guidance makes clear that disclosure is mandatory for all new contracts from 1/1/2021 and that disclosure is voluntary for earlier contracts." This still does not confirm any level of conformance by the Amandelbult site or Anglo American's platinum operations in South Africa in general.</p> <p>According to the legal department there is a "Right to Mine" permit. Also, there are various other permitting requirements for the environment. Evidence provided did not confirm that the Mining Rights Permit contains material terms for mineral exploration, development, and production. However, the auditor confirmed that the South African constitution guarantees that a requester must be given access to information held by a public body, like the DMR.</p>
1.5.4.2.	<p>The beneficial ownership of the operating company shall be publicly accessible.</p>		<p>The site provided documents as evidence but stated that, "no information provided regarding Anglo American's position on disclosure of beneficial ownership." However, they correctly noted that, "proof of Anglo American beneficial ownership being publicly accessible would be on the shareholder register, obtained at the PLC corporate level, not the site level," However, this cannot be confirmed for the Amandelbult site as it is not specifically addressed in the provided documents.</p> <p>In interviews, mine personnel stated that the shareholder list should be publicly available and show that Anglo American PLC has 80% ownership of Anglo American Platinum, which, in-turn owns 100% of Rustenburg Platinum Mine. Amandelbult is an operating unit of Rustenburg Platinum Mine.</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>The ownership of the mine is not published directly. However, it is indirectly available to the public through a variety of sources:</p> <p>The Access to Information Act in South Africa allows such information to be requested from the Registrar of Companies, and interviewees noted that some independent research companies and asset managers have used this information for further data analysis. The availability of these third party analyses was not confirmed.</p> <p>Additionally, there is a combined joint venture that has Rustenburg Platinum Mine 74% ownership, purely for beneficial processing of chrome and the same sources would allow true beneficial ownership to be determined.</p> <p>The auditor confirmed that the South African constitution guarantees that a requester must be given access to information held by a public body, like the DMR.</p> <p>The above suggests that, although the ownership may be accessible, it would not be easy for most people to access or discern the details relevant to Amandelbult.</p>
1.5.5.1.	<p><b>Critical</b> The operating company shall develop, document, and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.</p>		<p>Provided documents clearly show the policies and code at the highest level to meet this requirement.</p> <p>Personnel in management positions are all required to take anti-corruption training annually. Evidence shows this has taken place at Amandelbult.</p> <p>Worker interviews pointed to historic instances where job and/or overtime selling (the practice of giving preferential treatment in the job or overtime selection process for a fee paid by the candidate or worker) had occurred. Follow-up interviews with Human Resources management confirmed these historic examples, resulting in subsequent investigations and disciplinary action being taken. Efforts have been made to address these corrupt practices but the site acknowledged this is an on-going area of concern.</p>
1.5.5.2.	<p>Procedures shall include:</p> <p>A. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and</p>		<p>The evidence reviewed sets out group level expectations in the 'Business Integrity Policy', where it states "Employees, contractors and suppliers must report any breaches, or potential breaches of this Policy. Violations of this Policy will lead to disciplinary action in accordance with the Group disciplinary procedures. Disciplinary actions may involve sanctions up to and including summary dismissal.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	B. Disciplinary actions to be taken if cases of bribery or corruption are discovered.		Worker and management interviews during the assessment indicated that at least one form of corrupt practice, job and overtime selling, was an ongoing concern. This suggests that processes are not fully implemented or not fully effective.
1.5.5.3.	Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.		<p>Annual online training is required for personnel in decision-making positions. The supplied evidence stated that "All employees and contractors must be made aware of this Policy and its requirements in their induction. Workshops and online training are provided to those employees, contractors and third parties whose roles expose them to the risks of bribery and corruption." Anyone on-site for more than six days must go through the same training as employees.</p> <p>Completion records for almost 5,000 employees were provided.</p>

## Principle 2: Planning for Positive Legacies


### RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

### Note on Chapter 2.1:

In October 2020, the IRMA Board approved changes in the way Chapter 2.1 was to be audited for existing mines.<sup>8</sup> The table below now shows where expectations are different for new versus existing mines. Existing mines are only required to meet a core set of requirements related to assessment of environmental and social risks (called CORE requirements), although existing mines have the option to be audited against the new mine requirements. If they have opted to do so, that will be reflected in the Basis for rating column. Existing mines are still required to have in place an environmental and social management system.

Requirement #	Requirement Text	Rating	Basis for rating
<b>Chapter 2.1—Environmental and Social Impact Assessment and Management</b>			
2.1.1.1	An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with		Mining commenced in the early 1990s, and as expansions across the mine (and shafts) take place, the Environmental Impact Assessment and Environmental Management Programs documents have been and continue to be updated.

<sup>8</sup> For more information, see the IRMA Guidance Note on Chapter 2.1: <https://responsiblemining.net/wp-content/uploads/2021/07/Chapter-2.1-ESIA-Guidance-Final-2020.pdf>




Requirement #	Requirement Text	Rating	Basis for rating
	the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project.		The necessary authorizations are applied for and received in line with the required legislation.
2.1.1.2.	To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken.	✓	Mining commenced in the early 1990s, and as expansions across the mine (and shafts) take place, the Environmental Impact Assessment and Environmental Management Programs documents have been and continue to be updated. The necessary authorizations are applied for and received in line with the required legislation.
2.1.1.3.	The ESIA shall be carried out in accordance with publicly available, documented procedures.	✓	<p>The recent Stakeholder Impact Assessment Modernization Project National Environmental Management Act steps have prescribed a public participation process to be followed. <a href="https://www.angloamericanplatinum.com/sustainability">https://www.angloamericanplatinum.com/sustainability</a></p> <p>The Environmental and Social Impact Assessment and associated specialist studies are undertaken in accordance with South African legislation (National Environmental Management Act and Mineral and Petroleum Resources Development Act). The requirements are publicly available. Evidence of previous environmental impact assessment application forms are included in the document upload sections.</p> <p>The mine (through an appointed consultant) is in the process of expansion which is anticipated to commence in 2024. As part of the expansion, existing Environmental Impact Assessments and associated scoping reports will be included and consolidated into one report.</p>
2.1.2.1.	Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project.	✓	Amandelbult mine had undertaken public announcements (as outlined in South African legislation) with respect to the initial applications and current expansion projects (e.g., notices in local newspapers, notices placed in strategic localities around the site in the three most prominent languages of the area).





Requirement #	Requirement Text	Rating	Basis for rating
2.1.2.2.	<p>Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:</p> <ul style="list-style-type: none"> <li>A. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities;</li> <li>B. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts;</li> <li>C. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and</li> <li>D. Contact details for the person or team responsible for management of the ESIA.</li> </ul>	●	<p>Reports have been compiled by registered environmental assessment practitioners, however, these reports and associated specialist studies have not been published on the Anglo American Platinum website. South African legislative requirements do not require reports to be published on company websites, but it is required that the reports to be made available to Interested and Affected Parties. Responses by mine personnel indicated that the Environmental and Social Impact Assessment reports and associated specialist studies during application phase were placed at strategic locations for interested and affected parties to review and comment.</p>
2.1.3.1.	<p><b>Critical (New Mines)</b> The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.</p> <p><b>Critical (Existing Mines)</b> The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental and social impacts associated with the mining operation.</p>	✔	<p>Anglo American Amandelbult is an existing mine, not a new mine. Therefore, the scoping report was provided for review and highlights the potential environmental and social impacts that may arise, as well as the proposed mitigation measures that can be implemented.</p>
2.1.3.2.	<p>During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as "stakeholders") who may be interested in and/or affected by the proposed project.</p>	●	<p>The public participation process is described in Section 12.2 on page 46 of the Environmental Management Program Report.</p> <p>The mine is also in possession of a Stakeholder Engagement Plan. The stakeholder database includes all relevant interested and affected parties for the site. There was a possible gap in terms of vulnerable groups. Although organizations for people with disabilities and youth groups were identified,</p>

Requirement #	Requirement Text	Rating	Basis for rating
			there did not appear to be any identified groups outside of pressure groups (e.g. women, elderly, migrants)
2.1.3.3.	<p>Scoping shall include the consideration of:</p> <ul style="list-style-type: none"> <li>A. Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure;</li> <li>B. Direct, indirect and cumulative impacts; and</li> <li>C. Potential impacts of extreme events.</li> </ul>	●	<p>'Points a and b of the requirements under this chapter are included in the 2016 Scoping Report. However, point c, which refers to climate change risks, is not explicitly described in the site's existing environmental impact assessments and environmental management programs. Updates will be made in the next revisions of environmental impact assessments and environmental management programs.</p>
2.1.3.4	<p>Scoping shall result in the identification of:</p> <ul style="list-style-type: none"> <li>A. Potentially significant environmental and social impacts of the proposed project;</li> <li>B. Alternative project designs to avoid significant adverse impacts;</li> <li>C. Other actions to mitigate identified adverse impacts; and</li> <li>D. Additional information and data needed to understand and assess the potential impacts.</li> </ul>	●	<p>Understanding and evaluating external and internal issues is described in the Safety, Health, and Environment Way. Impact and risk prevention management are addressed in the Anglo American Social Way.</p> <p>The public participation process is addressed in the Environmental Management Program Report.</p> <p>The Scoping Report is compiled in line with the requirements of the South African legislative framework.</p> <p>The 2016 Scoping Report addresses the potentially significant environmental and social impacts of the proposed project. The no-go alternative (not proceeding with all or part of the proposed activities) will be further considered in the Environmental Impact Assessment phase of the project and is not included in the Scoping Report.</p>
2.1.4.1.	<p>Baseline data describing the prevailing environmental, social, economic, and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project.</p>	✔	<p>Baseline data is included in existing Social and Environmental Impact Assessment reports and at an appropriate level of detail to assess potential impacts.</p>

Requirement #	Requirement Text	Rating	Basis for rating
2.1.4.2.	Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA.	✔	Associated specialist studies are included as part of the environmental impact assessment / Environmental Management Programs Report. With further project expansions envisaged, specialist studies will be updated.
2.1.5.1	<p>The operating company shall:</p> <ul style="list-style-type: none"> <li>A. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping;</li> <li>B. Determine the significance of the predicted impacts;</li> <li>C. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the avoidance of impacts through consideration of alternative project designs; and</li> <li>D. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders.</li> </ul>	●	A summary of positive and negative implications and risks of proposed activity and identified alternatives are described in the environmental impact assessment and Environmental Management Programs Report. There is no evidence that existing mechanisms are in place to fully meet requirements as outlined in point d.
2.1.6.1.	<p>The operating company shall prepare an ESIA report that includes, at minimum:</p> <ul style="list-style-type: none"> <li>A. A description of the proposed mining project;</li> <li>B. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts;</li> <li>C. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts;</li> <li>D. A review of the public consultation process, the views and concerns expressed by stakeholders</li> </ul>	●	Requirements a, b, d, and e are included in the Environmental Management Program Report and Environmental Impact Assessment documents. There is no evidence of existing mechanisms in place to fully meet requirements as outlined in point c (i.e., how concerns expressed by stakeholders were considered during the environmental impact assessment phase of the project).



Requirement #	Requirement Text	Rating	Basis for rating
	<p>and how the concerns were taken into account; and</p> <p>E. Names and affiliations of ESIA authors and others involved in technical studies.</p>		
2.1.7.1.	<p>The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine.</p>		<p>Amandelbult is ISO 14001:2015 and ISO 45001:2018 certified. Several mechanisms are in place to ensure that the mine demonstrates conformance to the requirements of ISO 14001 and ISO 45001.</p> <p>In addition, the mine has developed a baseline risk assessment, a job hazard analysis, and a job risk analysis that identify and mitigate hazards from activities with the potential to cause impacts.</p>
2.1.7.2	<p>An environmental and social management plan (or its equivalent) shall be developed that, at minimum:</p> <p>A. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process;</p> <p>B. Assigns personnel responsible for implementation of various elements of the plan; and</p> <p>C. Includes estimates for the resources needed to implement the plan.</p>		<p>The Anglo American Social Way Toolkit, which provides guidance on the site's social performance review and planning.</p> <p>The mine has not been able to demonstrate adherence to timelines and commitments outlined in various management plans.</p> <p>Multiple instances of outdated timelines / change in personnel were noted across various chapters resulting in specific actions having to be postponed/extended.</p>
2.1.7.3.	<p>The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information.</p>		<p>The Environmental Management Program Report highlights actions to be taken by the Amandelbult teams to achieve objectives towards compliance.</p> <p>Whilst evidence of a system is well documented and the mine is certified, there were multiple instances noted throughout the on-site assessment where greater efforts should be made to conform to the requirements of a management system, such as management of third parties and ensuring that they understand all risks pertaining to tasks contracted to undertake (i.e., waste management, construction, etc.).</p> <p>The mine is exposed due to poor performance of their contractors and third parties in meeting the Anglo American Environmental Health and Safety and other required standards.</p>




Requirement #	Requirement Text	Rating	Basis for rating
2.1.8.1.	<p>As part of the ESMS, the operating company shall establish a program to monitor:</p> <ul style="list-style-type: none"> <li>A. The significant environmental and social impacts identified during or after the ESIA process; and</li> <li>B. The effectiveness of mitigation measures implemented to address environmental and social impacts.</li> </ul>		<p>An audit of compliance with monthly performance reviews was undertaken. As part of the 2020 Section 34 audit report undertaken by SRK in 2020, ERM CVS notes that 83% of the conditions was evaluated as compliant, whilst 11% was identified as partially compliant and 6% was noted to be non-compliant.</p> <p>ERM CVS noted that the SW Toolkit, Section 2 provides guidance on the site's social performance review and planning.</p>
2.1.8.2.	<p>The monitoring program shall be designed and carried out by competent professionals.</p>		<p>The mine has appointed various specialist consultancies to assist/support in the implementation of the Social Way.</p> <p>Monitoring programs (water, air quality) are undertaken by independent professionals who are competent in the respective fields. All E&amp;S monitoring programs are managed by subject matter experts in specific fields and have the necessary qualifications.</p>
2.1.8.3.	<p>If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project.</p>		<p>Environmental management plan performance audits and Regulation 34 audits are undertaken by the mine. In addition, a letter has been provided informing stakeholders that the report is available and has been submitted to the authorities.</p> <p>No evidence of requests has been made to date. However, should it be requested, Amandelbult will facilitate independent monitoring as required.</p>
2.1.9.1.	<p><b>(New Mines)</b> As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:</p> <ul style="list-style-type: none"> <li>A. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3);</li> <li>B. Methodologies for the collection of environmental and social baseline data (see 2.1.4);</li> <li>C. The findings of environmental and social studies relevant to the conclusions and recommendations of the ESIA (see 2.1.5.1.a and b);</li> </ul>		<p>The stakeholder engagement process is undertaken as part of the Environmental Impact Assessment process. South African legislation is specific with respect to the timing for receiving inputs from stakeholders.</p>





Requirement #	Requirement Text	Rating	Basis for rating
	<p>D. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c);</p> <p>E. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and</p> <p>F. The final conclusions and recommendations of the ESIA (see 2.1.6.1).</p> <p><b>(Existing Mines)</b> The operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine</p>		
2.1.9.2.	<p><b>(New Mines)</b> The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process.</p> <p><b>(Existing Mines)</b> The operating company shall encourage and facilitate stakeholder participation, where possible, in the development of options to mitigate the potential impacts of the mine.</p>	✓	<p>The stakeholder engagement process is undertaken as part of the environmental impact assessment process. South African legislation is specific with respect to the timing for the receipt of inputs/feedback during the public participation process.</p>
2.1.9.3.	<p>The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and social monitoring program.</p>	✓	<p>The stakeholder engagement process is undertaken as part of the Environmental Impact Assessment process. South African legislation is specific with respect to the timing for the receipt of inputs/feedback during the public participation process.</p> <p>In terms of the monitoring program, no comments have been received from stakeholders to date.</p>
2.1.9.4.	<p>The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program.</p>	✓	<p>Notification of Rustenburg Platinum Mines: Amandelbult Complex Regulation 34 Audit, dated 10 December 2020 was provided for review whereby all interested and affected parties have been informed of the audit report submission.</p> <p>Presentation of all environmental monitoring undertaken by Amandelbult team was provided to the Stakeholder Engagement Forum. In terms of the</p>

Requirement #	Requirement Text	Rating	Basis for rating
			monitoring program, no comments have been received from stakeholders to date.
2.1.9.5.	The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments.	✓	Comments from stakeholders are recorded during the public participation phase of the Environmental Impact Assessment and included in the Environmental Impact Assessment, and Environmental Management Programs Report.
2.1.10.1.	<b>(New Mines)</b> The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner. <b>(Existing Mines)</b> At minimum, a summary of the significant environmental and social impacts and risks associated with the mining operation shall be made public	✓	As part of the advert inviting public comment on the Environmental Impact Assessment and associated documentation, the localities / placement of the reports is also listed in the advert which then alerts all those interested and affected by the project to have an opportunity to review the report and associated specialist studies.
2.1.10.2.	The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was considered.	●	The Environmental and Social Impact Assessment process (including records) is governed by host country legislation. South African legislation at the time of publication of the Environmental Impact Assessment required details of stakeholders to be documented unless the stakeholders explicitly stated their wish to remain anonymous. The mine has not received any requests which indicate if any stakeholders had wished to remain anonymous.
2.1.10.3.	The environmental and social management plan shall be made available to stakeholders upon request.	✓	The updated Safety, Health, and Environment Policy does include how the mine will make relevant environmental information available to stakeholders when requested.

Requirement #	Requirement Text	Rating	Basis for rating
2.1.10.4.	Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available.	⊕	<p>Disclosures pertaining to environmental and social performance are provided in the annual Environmental, Social and Governance (ESG) Report that is published on the Company website which is accessible to the public.</p> <p>The methodologies related to Environmental and Social monitoring are not fully incorporated into the ESG reports.</p> <p>The updated Safety, Health, and Environment Policy does include how the mine will make relevant environmental related information available to stakeholders when requested.</p>
2.1.10.5.	<p><b>(New Mines)</b> The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means.</p> <p><b>(Existing Mines)</b> The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means.</p>	⊙	<p>Environmental Management Programs Report / Environmental Impact Assessment documentation is published through the Anglo American website. In addition, reports highlighting progress in respect of the mine's Environmental and Social Management System are also published on the company website.</p>
<b>Chapter 2.2—Free, Prior and Informed Consent (FPIC)</b>			
	Chapter Not Relevant		<p>While the company has an applicable Indigenous Peoples policy that considers Free Prior Informed Consent, no Indigenous Peoples meeting the IRMA definition were identified. Collectively Indigenous Peoples in South Africa are known as Khoi -San. Koi-San are located primarily in the Western, Eastern and Northern Cape Regions and are therefore at some considerable distance from the site. The Khoi San have not claimed indigenous rights in the vicinity of the mine site. .</p> <p>The community who occupied the land where the mine is located is the Baphalane-Ba-Mantserre. This community forms part of the broader Sepedi-speaking tribal group, which forms one of the largest African populations within South Africa. Based on the evidence reviewed for this assessment, it is the understanding of the auditor team that the Baphalane-Ba-Mantserre community is not among groups recognized in South Africa as Indigenous nor do they align with the criteria IRMA has adopted for Indigenous which includes "peoples who identify themselves and are recognized and accepted by their community as indigenous; demonstrate historical continuity with pre-colonial and/or pre-settler societies; have strong links to territories and surrounding</p>




Requirement #	Requirement Text	Rating	Basis for rating
			<p>natural resources; have distinct social, economic or political systems; maintain distinct languages, cultures and beliefs; form non-dominant groups of society; and resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities.”</p> <p>For these reasons, Chapter 2.2 Free Prior Informed Consent was considered “Not Relevant”</p>
<b>Chapter 2.3—Obtaining Community Support and Delivering Benefits</b>			
2.3.1.1.	<p>The operating company shall publicly commit to:</p> <ul style="list-style-type: none"> <li>A. Maintaining or improving the health, social and economic wellbeing of affected communities; and</li> <li>B. Developing a mining project only if it gains and maintains broad community support.</li> </ul>	✔	<p>The site follows groups' commitment to sustainable mining and commits publicly to ensure operations support their doorstep and host communities. The current Stakeholder Engagement Plan also indicates that transparency and meaningful engagement is key to effective stakeholder relations, publicly indicating that this is priority for the site.</p>
2.3.2.1.	<p>For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained.</p>	—	<p>Not a new mine.</p>
2.3.2.2.	<p>For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support:</p> <ul style="list-style-type: none"> <li>A. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project;</li> <li>B. Was transparent;</li> </ul>	—	<p>Not a new mine.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>C. Was free from coercion or manipulation; and</p> <p>D. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution.</p>		
2.3.2.3.	For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.		<p>The Community Engagement Forum (implemented in 2022) is a new platform but demonstrates commitment to community engagement and improving relationships.</p> <p>Despite the commitment and contribution to host communities, dissatisfaction exists relating to access to project benefits and employment and a dependence on the mine for municipal services.</p>
2.3.3.1.	The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company's contributions to community development initiatives and benefits in affected communities.		<p>The site engages with multiple stakeholders, including government and community leadership, to identify and design socio-economic development and community initiatives. These include the site's Socio-Economic Development Plan, Social and Labour Plan (legal requirement), as well as ad hoc community social investment and local procurement programmes.</p> <p>The host communities are spread over a large area, and there is ongoing inter and intra-community conflict over mine benefits. As a result, not all communities have equal opportunity to benefit from mining activities, which was noted to cause frustration and distrust. Interviews with external stakeholders indicated that the communities do not feel well engaged on socio-economic development projects.</p>
2.3.3.2.	The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency.		<p>There is a participatory process in place as per the Stakeholder Engagement Plan and socioeconomic development; however, there is no clear section or process for ensuring fair and equitable involvement across communities, particularly vulnerable groups.</p> <p>Several stakeholders indicated that projects had failed due to poor alignment with local needs, resources, and social norms. The implementation of the more inclusive Community Engagement Forum and socioeconomic development program is not fully implemented.</p>




Requirement #	Requirement Text	Rating	Basis for rating
2.3.3.3.	If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process.		There has not been a specific request from stakeholders for an external party to assist with the participatory process, however, the mine has undertaken several voluntary actions in relation to this requirement (third party consultants appointed to assist in Stakeholder Engagement Plan development and Zimele capacity building).
2.3.3.4.	Efforts shall be made to develop: A. Local procurement opportunities; B. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and C. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations).		a. There is a clear demonstration of local procurement opportunities through the Zimele Program. b. Socioeconomic development initiatives illustrate a Youth Development Program, and loans and capacity building may benefit women and marginalized groups, but this is not specifically stated (Community Engagement Forum to contribute to this form). c. Socioeconomic development initiatives aim to develop sustainable businesses and jobs through mentorship and advisory programs, improving access to regional markets outside of the mine. However, stakeholders indicated that several community projects did not fulfil their intended needs, and often failed due to lack of interest and proper implementation. Evidence of long-term, sustainable economic development has not been adequately provided.
2.3.3.5.	The planning process and any outcomes or decisions shall be documented and made publicly available.		Some processes and associated outcomes are shared, but this is not consistent across all processes and decisions/outcomes. Publicly accessible/shared documents (such as the Socio-Economic Development Plan, Social and Labor Plan, and Stakeholder Engagement Plan), as well as discussions with leadership forums, indicates that planning processes are shared with communities. However, several stakeholders indicated that they did not feel that they were included in the decision-making processes or that the information provided was transparent or meaningful to them.
2.3.3.6.	In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements.		The site monitors community benefits through the Sustainable Mining Plan and periodic engagements with communities. However, indicators are not aligned to socioeconomic development strategy or community inputs and need to be updated through engagement with the Community Engagement Forum.



Requirement #	Requirement Text	Rating	Basis for rating
Chapter 2.4—Resettlement			
	Chapter Not Relevant		<p>No resettlement has taken place at the Amandelbult Complex. The site is not a New Mine and no changes have occurred since 2006 that would require population resettlement. For these reasons, Chapter 2.4 was considered “Not Relevant. ”</p> <p>The historic resettlement of the communities on the site occurred in the 1960’s, before the Company was involved on the site. This was undertaken by the government at the time,</p>
Chapter 2.5—Emergency Preparedness and Response			
2.5.1.1.	<p><b>Critical</b> All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in <i>United Nations Environment Program, Awareness and Preparedness for Emergencies at the Local Level (APELL)</i> for Mining.</p>	✔	<p>The current Emergency Preparedness and Response Plans, Business Continuity Management Plans, and emergency procedures, between them, contain all suggested components or equivalents meeting the intent.</p>
2.5.1.2.	<p>The operating company shall:</p> <ul style="list-style-type: none"> <li>A. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and</li> <li>B. Update the communications contacts of the emergency response plan at least annually.</li> </ul>	✔	<p>The mine provided evidence of scheduling and conducting emergency exercises. Drills/exercises are conducted frequently (mostly monthly), covering a large variety of different scenarios, although not every individual scenario is scheduled for exercise every 12 to 24 months.</p> <p>The plan requires biannual updates of emergency contact information. However, while the Emergency Preparedness and Response Plan contains a register of changes, they do not indicate when reviews took place, and no changes were made. Other documents containing emergency contact lists (e.g., Community Emergency Preparedness process with contacts) had no dated information or review history at all.</p> <p>Based on interviews, contact information is updated annually and several key documents were updated between Stage 1 and Stage 2.</p>

Requirement #	Requirement Text	Rating	Basis for rating
2.5.2.1.	<b>Critical</b> The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan and include their participation in emergency response planning exercises.		<p>Documentation evidence exists for the engagement of workers, including meetings minutes and other documentation showing engagement with local community in emergency preparedness but not necessarily consultation. (i.e., It seems the mine informs the community of decisions rather than involving them in the planning process).</p> <p>During Stage 2, community engagement and stakeholder meetings included some discussion of threats. The site employed an external consultant (Disaster Management Solutions) to help incorporate various external stakeholders in emergency planning.</p> <p>The mine acknowledged that consultation with communities and their emergency services was not as good as it could be.</p> <p>There is an opportunity to continue improving engagement with external entities in emergency response.</p> <p>There is a plan to involve emergency preparedness task teams in the community to assist with emergency responses.</p>
2.5.3.1.	All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events.		Contractors are not specifically mentioned in the requirements. However, the response stated that, "All contractors employed by the mine are required to take out Public Liability Insurance before any contract is confirmed and signed" but the associated documents contain no reference to such insurance.
2.5.3.2.	The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others.		The summary of Exclusions to Comprehensive General Liability Coverage does not exclude any of the required coverage.
2.5.3.3.	The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property.	—	Mine agrees that this requirement is not relevant, but that public liability insurance has been in place continuously and remains so anyway.

Chapter 2.6—Planning and Financing Reclamation and Closure

Requirement #	Requirement Text	Rating	Basis for rating
2.6.1.1.	The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company.		Reclamation and closure plans for exploration activities are covered in the Final Rehabilitation, Decommissioning and Mine Closure Plan.
2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.		<p>An exploration drilling plan is in place; however, this does not address whether exploration-related reclamation has taken place or will do so in a timely manner. Supporting documents provided in the form of the (Rehabilitation Strategy Guide and Final Rehab, Decommissioning and Mine Closure Plan, 2020) does not cover exploration and does not address exploration-related reclamation except by reference to the regulations.</p> <p>In a report titled "Exploration Drilling Supporting Documents for Closure Plan" by Geosciences, reference to reclamation is highlighted as:</p> <ul style="list-style-type: none"> <li>- Drill site rehabilitation is included in the drilling contractor scope of work and is budgeted in the drilling rate.</li> <li>- The 5-year exploration drilling and sealing budget is compiled and reviewed annually.</li> </ul> <p>No further action plans or supporting documentation were made available to confirm whether exploration related reclamation has been taking place in a timely manner.</p>
2.6.1.3.	Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4).	—	According to mine rationale: There are no stakeholder complaints of incomplete or inadequate exploration reclamation.
2.6.2.1	<b>Critical</b> Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.		<p>As the mine has been operational for several years, it is not known whether the Reclamation and Closure Plan was in place. However, updates to the closure liability assessment and Closure Plan are undertaken by a third-party service provider. Final Rehab, and Closure Plan is in place and addresses returning to a stable landscape while protecting human health and the environment.</p> <p>The overall closure goals for Amandelbult are as follows:</p> <ul style="list-style-type: none"> <li>- To create non-polluting landforms that have stable outer slopes and do not compromise future land uses on adjacent sites, that contribute to the</li> </ul>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>biodiversity of the area, and which are aesthetically acceptable, as informed by stakeholder consultation</p> <p>- To also provide the impetus for viable and sustainable land uses, alternative livelihoods, and associated ventures as part of the mine's closure-related endeavors to offset the likely adverse effects of mine closure on the local socioeconomic situation.</p> <p>At the time of the Stage 2 On-site Assessment, the 2022 Closure Plan Assessment was being finalized.</p>
2.6.2.2	<p>At a minimum, the reclamation and closure plan shall contain:</p> <ul style="list-style-type: none"> <li>A. A general statement of purpose;</li> <li>B. Site location and background Information;</li> <li>C. A description of the entire facility, including individual site features;</li> <li>D. The role of the community in reviewing the reclamation and closure plan;</li> <li>E. Agreed-upon (after-ESIA) post-mining land use and facility use;</li> <li>F. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure;</li> <li>G. Source mitigation program to prevent the degradation of water resources;</li> <li>H. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization;</li> <li>I. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable;</li> <li>J. Earthwork: <ul style="list-style-type: none"> <li>i. Stabilization and final topography of the reclaimed mine lands;</li> <li>ii. Storm water runoff/run-on management;</li> </ul> </li> </ul>	⊕	<p>The final Rehabilitation, Decommissioning and Mine Closure Plan aligns to regulations under National Environmental Management Act, Financial Provisioning Regulations, 2015 GNR. 1147 (GN1147).</p> <p>Based upon review of the Mine Closure Plan, the required elements of this IRMA criteria have been included. Although many requirements are addressed, there is no reference to other evaluations containing the details required under this criterion for communities to be provided with an opportunity to review the Closure Plan (apart from the initial environmental impact assessment phase/s).</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>iii. Topsoil salvage to the maximum extent practicable;</li> <li>iv. Topsoil storage in a manner that preserves its capability to support plant regeneration;</li> </ul> <p>K. Revegetation/Ecological Restoration:</p> <ul style="list-style-type: none"> <li>i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use;</li> <li>ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time;</li> <li>iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed;</li> <li>iv. Measures for control of noxious weeds;</li> <li>v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6);</li> </ul> <p>L. Hazardous materials disposal;</p> <p>M. Facility demolition and disposal, if not used for other purposes;</p> <p>N. Long-term maintenance;</p> <p>O. Post-closure monitoring plan;</p> <p>P. The role of the community in long-term monitoring and maintenance (if any); and</p> <p>Q. A schedule for all activities indicated in the plan.</p>		
2.6.2.3.	<p>The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as</p>	✔	<p>The information presented shows a detailed analysis of closure costs and liabilities, in line with the requirements of this criteria.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>implemented by a regulatory agency. These costs shall include, at minimum:</p> <ul style="list-style-type: none"> <li>A. Mobilization/demobilization;</li> <li>B. Engineering redesign, procurement, and construction management;</li> <li>C. Earthwork;</li> <li>D. Revegetation/Ecological Restoration;</li> <li>E. Disposal of hazardous materials;</li> <li>F. Facility demolition and disposal;</li> <li>G. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including: <ul style="list-style-type: none"> <li>i. Interim process water and site management; and</li> <li>ii. Short-term water treatment;</li> </ul> </li> <li>H. Post-closure costs for: <ul style="list-style-type: none"> <li>i. Long-term water treatment; and</li> <li>ii. Long-term monitoring and maintenance;</li> </ul> </li> <li>I. Indirect Costs: <ul style="list-style-type: none"> <li>i. Mobilization/demobilization;</li> <li>ii. Engineering redesign, procurement and construction management;</li> <li>iii. Contractor overhead and profit;</li> <li>iv. Agency administration;</li> <li>v. Contingency; and</li> </ul> </li> <li>J. Either: <ul style="list-style-type: none"> <li>i. A multi-year inflation increase in the financial surety; or</li> <li>ii. An annual review and update of the financial surety.</li> </ul> </li> </ul>		

Requirement #	Requirement Text	Rating	Basis for rating
2.6.2.4.	The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report.	✔	Evidence supports the rationale that Amandelbult reviews and updates its reclamation and closure plan when there is a significant change (new projects, Environmental Impact Assessment processes) or at least every 5 years.
2.6.2.5.	<p>If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:</p> <p>A. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and</p> <p>B. Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety.</p>	⊕	<p>Neither the Social Way Policy nor the SW Toolkit 3A Stakeholder Engagement documents specifically addresses mine closure, mentions a 60-day comment period, nor commits to providing affected communities and interested stakeholders with the opportunity to propose independent experts to provide input on the closure plan. The 60-day comment period is a minimum requirement if other events have not occurred. South Africa's legislative framework timelines allow 30 days to review the scoping and impact reports respectively. It is practically not possible for comment periods to be extended outside of the time frames as enforced by the regulator.</p> <p>While it is understood that the communities are afforded an opportunity to comment on the Reclamation/Closure Plan during the environmental impact assessment amendment process (prior to approval from the authorities) and during the public participation phase, it is unclear on the resources allocated for capacity building and meaningful stakeholder engagement.</p>
2.6.2.6.	<b>Critical</b> The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request.	✔	The site's recently updated Safety, Health, and Environment Policy outlines the approach that would be followed should stakeholders request any "environmental related information". Closure planning and provisioning is included as part of the environmental impact assessment process (whereby the document is made publicly available). In addition, in the published annual sustainability report, cost provisioning for closure is included.
2.6.3.1.	Open pits shall be partially or completely backfilled if:	⊖	Open shallow pits are present with a water table that is not high enough to create a pit lake. Due to the strong agricultural potential of the Thabazimbi area, backfilling is anticipated to restore the area to agricultural potential. The

Requirement #	Requirement Text	Rating	Basis for rating
	<p>A. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and</p> <p>B. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and</p> <p>C. It is economically viable.</p>		<p>open pits have been partially backfilled and final rehabilitation is currently being conducted.</p> <p>As part of the draft 2022 Closure Cost Assessment, it was assumed that these activities would have been concluded at closure and therefore no allowances have been made for open pit rehabilitation at closure at life of mine. Life of mine for the open pits is 2024.</p>
2.6.3.2.	<p>Underground mines shall be backfilled if:</p> <p>A. Subsidence is predicted on lands not owned by the mining company; and</p> <p>B. If the mining method allows.</p>		<p>Mine backfilled areas can have potential subsidence; underground workings will be sealed with shaft plugs.</p>
2.6.4.1.	<p><b>Critical</b> Financial surety instruments shall be in place for mine closure and post-closure.</p>		<p>Evidence of surety instruments in the form of Guarantee was reviewed as part of the Stage 2 On-site Assessment.</p> <p>The Platinum Producers' Environmental Trust deed provides that the relevant regional managers of the Department of Mineral Resources and Energy approve the annual financial provision for the trust as proposed by the Anglo American Platinum team.</p> <p>The rehabilitation liability for all operations (Amandelbult Complex, Mogalakwena Complex and Twickenham Project) within the Platinum Producers' Environmental Trust at the end of 2021 was estimated to be R2,712,510,389. This includes the post-closure residual liability i.e., the surface and groundwater remediation liability for all three mining operations. The total premature rehabilitation liability at the end of 2021, as calculated in terms of Route 1 of the "Department of Mineral Resources and Energy Guideline Document for the Evaluation of the Quantum of Closure-related Financial Provision" is R3,807,487,896 after applying Weighting Factor 2, preliminary and general costs (6%), contingencies (10%), and value added tax (15%).</p> <p>Regulation 527 of the Minerals &amp; Petroleum Resource Development Act 28 of 2002 allows for three methods of financial provision. As per section 14.2 in the amended trust deed approved in October 2014, the 2021 shortfall in the closure provision will be covered entirely by means of financial guarantees and the existing funds in the Platinum Producers Environmental Trust (no cash contributions made, funds grow only via interest on investments).</p> <p>The total amount of financial guarantees in place as before the 2021 liability assessment for environmental rehabilitation is R2,514,057,647. The closing</p>



Requirement #	Requirement Text	Rating	Basis for rating
			balance in Platinum Producers Environmental Trust as estimated at the end of December 2021, is R774,537,567. Therefore, the overall pro-forma shortfall in the trust at the end of 2021 in case of premature closure will be R518,892,682. To address the shortfall at all three operations in Platinum Producers Environmental Trust, the top-up financial guarantees are submitted to the Department of Mineral Resources and Energy. This has resulted in all the Platinum Producers Environmental Trust operations being fully provided for as at the end of 2022.
2.6.4.2.	Financial surety instruments shall be: A. Independently guaranteed, reliable, and readily liquid; B. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan; C. In place before ground disturbance begins; and D. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed.	✔	Financial provision has been provided against the closure liability of the entire Amandelbult Operation in the form of a rehabilitation trust fund and financial guarantees that a financial audit is undertaken for financial provision every year.
2.6.4.3.	Self-bonding or corporate guarantees shall not be used.	✔	Evidence provided shows that self-binding or corporate guarantees are not used as financial surety.
2.6.4.4.	The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request.	✔	The updated Safety, Health, and Environment Policy does include how the mine intends to make relevant environmental information available to stakeholders when requested.
2.6.4.5.	Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:	●	Supporting documentation made available did not confirm that the public has or would be provided with 60 days to comment on financial surety prior to renewal or release. Supporting documents also do not confirm a policy to provide communities and stakeholders the opportunity to propose independent experts to review the financial surety. Available documents indicate that if requested by stakeholders, the operating company will provide

Requirement #	Requirement Text	Rating	Basis for rating
	<p>A. Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential reasons, the fact that the information has been withheld shall be disclosed along with the financial surety.</p> <p>B. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and</p> <p>C. Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to review the financial surety.</p>		<p>resources for capacity building and training to enable meaningful stakeholder engagement.</p> <p>The stakeholder engagement period in South Africa is legislated and comprises two 30-day comment periods as part of the Environmental Impact Assessment process.</p>
2.6.4.6.	<p>The terms of the financial surety shall guarantee that the surety is not released until:</p> <p>A. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and</p> <p>B. Public comment has been taken before partial or final surety release.</p>	✔	<p>This is a regulated process administered by the South African National Department of Mineral Resources and Energy and funds will not be released without adequate verification from the regulator.</p>
2.6.5.1.	<p>Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all mine facilities, including, but not limited to:</p> <p>A. Inspection of surface (open pits) and underground mine workings;</p>	⊕	<p>Commitment to post-closure monitoring was made available in draft format; It is noted that not all the required specifications were included.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>B. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and</p> <p>C. Mechanisms for contingency and response planning and implementation.</p>		
2.6.5.2.	Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance.	●	In the April 2022 Mine Closure Plan, for groundwater and surface water monitoring, it was assumed that post closure monitoring and maintenance will continue for a period of 10 years after operations cease, as it is believed that this is the minimum likely to be required under current circumstances. However, it should be noted that ultimately the required period of monitoring will be subject to the authorities' decisions.
2.6.5.3.	Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively.	●	<p>No evidence was noted to confirm that 25years of post-closure data would be collected unless ongoing water quality monitoring demonstrates, and modeling predicts that no contamination of surface or ground waters is occurring or will occur.</p> <p>Further work is required (as outlined in the April 2022 Draft Mine Closure Plan):</p> <ul style="list-style-type: none"> <li>- Long term groundwater impact from the Tailings Storage Facility,</li> <li>- Return Water Dams,</li> <li>- Backfilled opencast pits unknown</li> <li>- Potential for decant from underground workings/impact on Crocodile River / Bierspruit unknown</li> <li>- No surface water management requirements post closure identified</li> <li>- Impact of tailing storage facilities (if any) on surface water</li> <li>- Impact (if any) of run-off on Crocodile River / Bierspruit unknown.</li> </ul>
2.6.5.4.	Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources.	☑	Evidence provided shows that post-closure plans included biologic monitoring of aquatic and terrestrial organisms. Apart from invasive-species checks, there were no specific details, but development of a more detailed plan closer to the planned closure date was intended.

Requirement #	Requirement Text	Rating	Basis for rating
2.6.5.5.	If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds, or agricultural uses, adequate measures shall be taken to protect these organisms.	—	This criterion is marked as “Not Relevant” based upon no pit lake. There is not currently any pit lake, but the evidence supplied does not confirm that a pit lake is not predicted to form.
2.6.6.1.	<p>Long-term water treatment shall not take place unless:</p> <p>A. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and</p> <p>B. The operating company funds an engineering and risk assessment that:</p> <ol style="list-style-type: none"> <li>i. Is carried out by an independent third-party;</li> <li>ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods;</li> <li>iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms;</li> <li>iv. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and</li> <li>v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion.</li> </ol>	⊕	<p>The latest groundwater model predicts that decant will occur at the following locations (SRK, 2020):</p> <ul style="list-style-type: none"> <li>▪ Dishaba Mine –decant rate of 4.6 l/s at lowest shaft 50 E (936 mamsl) and Dishaba Shaft decant rate of 0.7 l/s.</li> <li>▪ Tumela Mine- the decant rate 3.8 l/s at lowest 10W (939.6 mamsl)</li> <li>▪ In terms of the potential post-closure decant, the decant volumes are low and will only surface around 100 years post sudden closure.</li> </ul> <p>Anglo American Platinum is looking at more sustainable solutions such as wetland or passive treatment to address the final decant water quality. In addition, the final decant water quality is not considered to be of critical health impact (as per World Health Organization guidelines), and remediating/improving decant water quality hasn't been included in the residual liability. For purposes of costing, engineered wetlands are assumed to be an appropriate solution and the costs thereof are included in the liability assessment for the management of the two decants. In the future, Anglo American Platinum will be exploring more sustainable solutions to improve the decant water quality and the cost of such an agreed solution will be costed in the residual liability.</p> <p>The provided evidence does not demonstrate that an engineering and risk assessment has properly evaluated environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods, incorporating data on the failure rates of proposed measures, etc.</p> <p>Stakeholders (surrounding communities) are not provided with an opportunity for consultation on the design of the long-term water treatment.</p>
2.6.6.2	If a decision is made to proceed with long-term water treatment, the operating company shall take all	⊕	Evidence supplied in answer to other requirements suggests that a need for post-closure water treatment is an ongoing possibility and, if so, that the operating company will make efforts to minimize the volume to be treated.

Requirement #	Requirement Text	Rating	Basis for rating
	practicable efforts to minimize the volume of water to be treated.		
2.6.7.1.	The operating company shall provide sufficient financial surety for all long-term activities, including mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company's finances at the time of mine closure or bankruptcy.	✓	The rationale provided states that estimated closure and rehab costs have been determined. Evidence reviewed in support of other assessed criteria indicates that the operating company has significant financial surety arrangements for closure and post-closure.  This is a regulated process administered by the South African National Department of Mineral Resources and Energy and funds will not be released without adequate verification from the regulator.
2.6.7.2.	If long-term water treatment is required post-closure: A. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and B. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded.	✗	Supplied evidence is limited to relevant guidelines or commitments for post-closure water management and does not support the notion that no post-closure water treatment has been identified as necessary.  As of April 2022, the Mine Closure Plan included groundwater and surface water monitoring. Post-closure monitoring and maintenance will continue for a period of 10 years after operations cease, as it is believed that this is the minimum time likely to be required under current circumstances. However, it should be noted that ultimately the required period of monitoring will be subject to the authorities' decisions.
2.6.7.3.	The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety.	✗	An external company developed costing related to the closure and rehab of the mine. There is no evidence of an amount for any ongoing post-closure apart from 5 years of post-closure monitoring.  No independent analysis is carried out on the Mine Closure Plan or closure cost estimates.
2.6.7.4.	Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:	●	Net present value and other audited and accepted methodology is used to calculate the post-closure financial surety; however, it is unclear what interest rates were considered at the time of the calculations.



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	<p>A. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and</p> <p>B. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US \$10.00 or less (or its equivalent in other currencies).</p>		<p>A conservative approach in line with acceptable and recognized accounting practices has been considered for post-closure financial surety. The entity holding the financial surety has documented that higher interest rates can be achieved in the long term, however, there is no confirmation whether the eventual calculation results in a real interest rate above or below the 3% specified in the IRMA Standard.</p>

# Principle 3: Social Responsibility

## RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant





Requirement #	Requirement Text	Rating	Basis for rating
Chapter 3.1—Fair Labor and Terms of Work			
3.1.1.1.	The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law.		Evidence provided, supported by on-site interviews, indicates human resources policies have been adopted, and collective agreements have been signed and implemented.
3.1.2.1.	<b>Critical</b> The operating company shall respect the rights of workers to freedom of association and collective bargaining.		Recognition agreements, Wage Agreement, Code of Conduct and Human Rights Policy provided. On-site interviews with workers and union representatives confirm respect for the right to freely associate with workers employed by the operating company.  However, Interviews with workers contracted by Business Partner and union representatives indicates the potential for human rights impacts related to harassment and intimidation. Interviews with multiple contract workers mention the threat of termination by their Business Partner if the potential of joining union were raised. While there is strong evidence the operating company respects the right of workers to associate and collectively bargain, it is uncertain whether the rights of contracted workers are fully respected by

Requirement #	Requirement Text	Rating	Basis for rating
			business partners. It could not be verified if the South African Constitution's protection of the right to freedom of association or the Group Responsible Sourcing Standard for Suppliers (Section 3.5) was being implemented.
3.1.2.2.	Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms.	—	Freedom of association is not restricted by South African law.
3.1.2.3.	The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner.	☑	Recognition agreements were provided. On-site interviews confirm that the operating company provides information in a timely manner to allow for meaningful negotiations.
3.1.2.4.	Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers' representatives at fly-in/fly-out or other remotely located mine sites, where relevant.	☑	Evidence was provided that full-time shop stewards are given a laptop and access to facilities. On-site interviews confirm that facilities are provided for union representatives to carry out their work on behalf of their members.
3.1.2.5.	The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike.	☑	Evidence provided, supported by on-site interviews indicates that the operating company stays neutral in the worker organizing process.



Requirement #	Requirement Text	Rating	Basis for rating
3.1.2.6.	<p>Upon employment, the operating company shall:</p> <ul style="list-style-type: none"> <li>A. Inform workers of their rights under national labor and employment law;</li> <li>B. Inform workers that they are free to join a workers' organization of their choosing without any negative consequences or retaliation from the operating company;</li> <li>C. If relevant, inform workers of their rights under any applicable collective agreement; and</li> <li>D. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative.</li> </ul>	✔	Evidence provided, supported by on-site interviews indicates that the operating company informs workers of their rights to organize. Copies of collective agreements are available from union representatives.
3.1.2.7.	The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike.	●	Evidence provided, and supported by on-site interviews, indicates a generally respectful relationship between management, workers, and union representatives, free from discrimination. Instances, however, were cited during on-site interviews where union representatives in grievance proceedings faced some measure of supervisory frustration in their respective workplaces as a result of their participation in a grievance process on behalf of a union member.
3.1.2.8.	Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements.	●	Evidence provided, supported by on-site interviews, suggests that the terms of collective agreements are generally respected. On-site interviews with management conceded that requested overtime was not fully voluntary and limits on overtime were exceeded. Interviews with workers and union representatives support this finding.
3.1.2.9.	The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce	✔	Evidence provided and supported by on-site interviews does not indicate the use of short-term contracts or other measures to undermine collective agreements or other obligations to workers.






Requirement #	Requirement Text	Rating	Basis for rating
	obligations to workers under applicable labor and social security laws and regulations.		
3.1.2.10.	The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike.	✓	Evidence provided and supported by on-site interviews does not indicate the use of replacement workers or other measures to undermine collective agreements or other obligations to workers.
3.1.3.1.	The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements.	●	Evidence provided, supported by on-site interviews indicates that generally, employment is based on the principles of equal opportunity and fair treatment. Interviews also cited instances where the qualified local workforce was not fully utilized, as well as allegations of job, contract and overtime selling. Additional evidence is needed to determine how these principles are monitored in the mine's supply chain.
3.1.3.2	<p>Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:</p> <ul style="list-style-type: none"> <li>A. Targets or quotas mandated by law;</li> <li>B. Targets developed through local agreements for the employment of residents, indigenous peoples, or individuals who have been historically disadvantaged; or</li> <li>C. Operating company targets for the employment of residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets.</li> </ul>	✓	Quotas are justified under sub-criteria A, B, and C (government required social labor plan, as well as Historically Disadvantaged South Africans Act and Employment Act).

Requirement #	Requirement Text	Rating	Basis for rating
3.1.3.3.	<b>Critical</b> The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially regarding female workers.		Evidence demonstrates an implemented policy and practice (i.e., training) to address Bullying, Harassment and Victimization and Gender-Based Violence. Panic buttons are issued to female workers.  On-site interviews cited instances and the potential for harassment and intimidation of contract workers by employees due to a difference in employment status in the workplace. However, interviews did not suggest harassment, intimidation or exploitation directed at women because of their gender.
3.1.4.1.	Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination and be implemented to reduce the adverse impacts of retrenchment on workers.		Management interviews suggest retrenchment was avoided in 2013 through redeployment of staff. The site analyzed alternatives, followed national labor laws, and engaged with unions. More recently the site has employed a number of measures (voluntary retirement, reskilling and redeploying) to avoid retrenchment, documenting engagement in Central Bargaining Forum minutes. The Labour Strategy provided for review includes engagement with unions and interested stakeholders. On-site interviews confirm on-going engagement but not joint development of a retrenchment plan.
3.1.4.2.	The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments.		Evidence provided, supported by on-site interviews with union representatives, suggests that the site follows a process consistent with collective agreements and the Conditions of Employment manual. Limited information was available on the process that Business Partners follow in dismissing workers and paying severance.
3.1.5.1.	<b>Critical</b> The operating company shall provide a grievance mechanism for workers (and their		Grievance mechanism evidence provided indicates multiple grievance access points, including an anonymous procedure, "Your Voice". On-site interviews with workers confirm awareness of procedures during induction, human resources

Requirement #	Requirement Text	Rating	Basis for rating
	<p>organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <ul style="list-style-type: none"> <li>A. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;</li> <li>B. Shall allow for anonymous complaints to be raised and addressed;</li> <li>C. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and</li> <li>D. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</li> </ul>		<p>onboarding and union representation. Interviews confirm workers may be represented. Employees may avail themselves of the Labor Relations Act provisions in terms of other administrative remedies. Interviews suggest that employees may be more likely to use grievance procedures than contract workers.</p>
3.1.5.2.	<p>The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.</p>	●	<p>Grievance mechanism evidence provided indicates multiple grievance access points, including an anonymous procedure, "Your Voice". However, on-site interviews with workers confirm awareness of procedure during induction, Human Resources onboarding and union representation. Interviews suggest that employees may be more likely to use grievance procedures than contract workers.</p>
3.1.5.3.	<p>The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues.</p>	✔	<p>The evidence provided indicates that grievances documented are logged through the Employee Relations Navigator. Grievance information is available to workers and their representatives.</p>
3.1.6.1.	<p>The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers.</p>	⊕	<p>Evidence provided, supported by on-site interviews, indicates that documented disciplinary procedures are in place and implemented for workers directly employed by the mine site.</p> <p>Limited information is available on disciplinary procedures used by business partners for contracted workers.</p>

Requirement #	Requirement Text	Rating	Basis for rating
3.1.6.2.	The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical, or verbal abuse, coercion or intimidation of workers during disciplinary actions.	✓	Evidence provided, supported by on-site interviews indicates that corporal punishment, or other degrading treatment is not used in disciplinary actions. Withdrawal of payment is used only if an employee was absent.
3.1.6.3.	The operating company shall keep records of all disciplinary actions taken.	✓	Evidence provided indicates that the site keeps records of disciplinary actions taken.
3.1.7.1.	The operating company shall document the ages of all workers.	✓	Evidence provided indicates that the ages of all workers are documented.
3.1.7.2.	<b>Critical</b> Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances).	✓	The Ethics in the Workplace presentation explicitly states that no one under the age of 18 will be employed at the site. The Responsible Sourcing Standard states that child labor will not be used, but the Responsible Sourcing Overview does not explicitly reference controls to mitigate the risk in the supply chain. The site worker list does not include any workers with a listed age less than 18. On-site interviews with workers and union representatives do not suggest any workers under the age of 18 have been hired.
3.1.7.3.	<b>Critical</b> The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher.	✓	The evidence provided indicates that no person under the age of 18 is hired by the site or by the operating company's supply chain. On-site interviews do not contradict this finding.
3.1.7.4.	When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself.	—	Evidence provided, supported by on-site interviews does not suggest that child labor is being employed at the site or in the site's supply chain.


Requirement #	Requirement Text	Rating	Basis for rating
3.1.7.5.	<p>If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:</p> <ul style="list-style-type: none"> <li>A. The child shall be removed immediately from his or her job; and</li> <li>B. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family.</li> </ul>	—	Evidence provided, supported by on-site interviews does not suggest that child labor is being employed at the site or in the site's supply chain.
3.1.7.6.	<p>Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.</p>	—	Evidence provided, supported by on-site interviews does not suggest that there is a high risk of child labor being employed at the site or in the site's supply chain.
3.1.8.1.	<p><b>Critical</b> The operating company shall not employ forced labor or participate in the trafficking of persons.</p>	☑	Evidence provided indicates that forced labor is not employed by the operating company or within its supply chain. On-site interviews do not contradict this finding.
3.1.8.2.	<p>Where there is a high risk of forced or trafficked labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy</p>	—	Evidence provided, supported by on-site interviews indicates that there is not a high risk of forced labor being employed by the operating company or within its supply chain.

Requirement #	Requirement Text	Rating	Basis for rating
	them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.		
3.1.9.1.	The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage.		Evidence provided, supported by on-site interviews indicates that the site pays wages that exceed minimum wage. There is limited information provided on whether business partners consistently pay workers a living wage.
3.1.9.2.	Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage.		Evidence provided, supported by on-site interviews indicates that the site pays overtime consistent with collective agreements and national law.
3.1.9.3.	All workers shall be provided with written and understandable information about wages (overtime rates, benefits, deductions, and bonuses) before they enter employment, and for the pay period each time they are paid.		Evidence provided, supported by on-site interviews, indicates workers are provided with an understanding of wages prior to employment and during each pay period. However, documentation on how contracted workers are informed of benefits and deductions was not available.
3.1.9.4.	The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check).		Evidence provided, supported by on-site interviews, indicates that the operating company and its business partners pay wages in a reasonable manner through a direct electronic payment method.
3.1.9.5.	The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist: A. Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or		Evidence provided, supported by on-site interviews indicates that deductions from wages are not made for disciplinary purposes. Wages are withheld only when a worker has been absent, consistent with collective agreements.

Requirement #	Requirement Text	Rating	Basis for rating
	B. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award.		
3.1.10.1.	<p>The operating company shall ensure that:</p> <ul style="list-style-type: none"> <li>A. Regular working hours do not exceed eight hours per day, or 48 per week. Where workers are employed in shifts the 8-hour day and 48-hour week may be exceeded, provided that the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week.</li> <li>B. Workers are provided with at least 24 consecutive hours off in every 7-day period; and</li> <li>C. Overtime is consensual and limited to 12 hours a week.</li> <li>D. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if: <ul style="list-style-type: none"> <li>i. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and</li> <li>ii. Through consultations with workers' representatives, a risk management process that includes a risk assessment for extended working hours is established to minimize the impact of longer working hours on the health, safety, and welfare of workers.</li> </ul> </li> </ul>	⊕	<p>While site policies and collective agreements indicate that overtime is voluntary, on-site interviews with management, workers and union representatives suggest that not all overtime can be considered fully at a worker's discretion to accept and that there may be instances where overtime exceeds the limits stated in subsection a) and time off in b) may not be adequate.</p> <p>The site's Upliftment of Overtime Block in the Time and Attendance System policy states that overtime maximums can be lifted in 'emergency' situations with supporting paperwork. However, interviews with site managers confirm that appropriate management of overtime continues to be a work-in-progress.</p>



Requirement #	Requirement Text	Rating	Basis for rating
3.1.10.2.	<p>Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:</p> <p>A. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and</p> <p>B. A maternity leave period of no less than 14 weeks.</p>	⊕	<p>Evidence provided, supported by on-site interviews, indicates that full-time permanent employees of the operating company are provided with relevant leave.</p> <p>Evidence was not provided to verify if contracted workers are provided with similar leaves.</p>
<b>Chapter 3.2—Occupational Health and Safety</b>			
3.2.1.1.	The operating company shall implement a health and safety management system for measuring and improving the mining project’s health and safety performance.	✔	Provided evidence shows that the company has a conforming health and safety management system in place. The site visit confirmed that the company has a fully developed program covering all anticipated safety and health programs, including work-place safety, industrial hygiene, and occupational health.
3.2.2.1.	The operating company shall implement an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations.	⊖	<p>Provided evidence shows that the company has implemented an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations.</p> <p>Several concerns noted during the assessment indicated that some risks may not have been properly identified or controlled (see 3.2.4.1). This was mostly due to inadequate implementation and communication of controls but there remains an opportunity to strengthen the process of identifying risks and controls.</p>
3.2.2.2.	<p>The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:</p> <p>A. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of</p>	⊖	<p>Site personnel shared high level risk assessment processes and examples. The assessment process covers all requirements.</p> <p>The high-level issue-based risk assessment tool breaks up hazards by area which then feeds into the job risk analysis. In the process of completing job risk analysis. The company is using high-level job risk analyses and work-execution documents to identify required risks. A total of 600+ job risk analyses have been developed so far.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>equipment and machinery, and waste and chemical management.</p> <p>B. All personnel, contractors, business partners, suppliers, and visitors.</p> <p>C. Unwanted events.</p> <p>D. Routine and non-routine activities, products, procedures, and services; and</p> <p>E. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems, and services.</p>		<p>Several concerns specific to waste and chemical management were noted during the assessment.</p>
3.2.2.3.	<p>The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to hazards.</p>		<p>A high-level issue-based risk assessment tool breaks up hazards by area, which then feeds into job risk analyses. Some groups are not allowed to work in high-risk areas e.g., women. The site has identified and risk-assessed the most vulnerable groups. Examples include identification of lighting and cameras, provision of panic buttons, pregnancy provisions, etc. Also, there are controls specific to older, COVID-19 vulnerable workers.</p>
3.2.2.4.	<p>The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards.</p>		<p>Evidence provided in support of previous criteria shows a risk assessment process that includes the identification of risk reduction, mitigation, or control measures. They are about halfway through the development of job safety analyses. There is a planned 4-year review cycle.</p> <p>The incomplete status of job safety analysis development means that the organization may not have identified some additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards.</p> <p>Several concerns specific to waste and chemical management were noted during the assessment that the mine has taken action on. This will be followed up at the next surveillance audit.</p>
3.2.2.5.	<p>In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:</p>		<p>Evidence provided confirms that the company has processes in place that should be expected to meet the criteria requirements.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>A. Ensure that the mine has electrical, mechanical, and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment.</li> <li>B. Ensure that the mine is commissioned, operated, maintained, and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons.</li> <li>C. Maintain the stability of the ground in areas to which persons have access in the context of their work.</li> <li>D. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface.</li> <li>E. If relevant, ensure adequate ventilation for all underground workings to which access is permitted.</li> <li>F. Ensure a safe system of work and the protection of workers in zones susceptible to hazards.</li> <li>G. Prevent, detect, and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and</li> <li>H. Ensure that when there is potential high risk of harm to workers, operations are stopped, and workers are evacuated to a safe location.</li> </ul>		
3.2.3.1.	<p>Workers shall be informed of their rights to:</p> <ul style="list-style-type: none"> <li>A. Report accidents, dangerous occurrences, and hazards to the employer and to the competent authority.</li> <li>B. Request and obtain, where there are cause for concern on safety and health grounds, inspections, and investigations to be</li> </ul>	●	The evidence provided confirms that the company informs workers of the required rights to withdraw from work, and to report dangerous occurrences and hazards. Election of health and safety representatives is notified to workers by the union(s) and company jointly. Health and safety representatives may request technical assistance or request government inspections or investigation.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>conducted by the employer and the competent authority.</p> <p>C. Know and be informed of workplace hazards that may affect their safety or health.</p> <p>D. Obtain information relevant to their safety or health, held by the employer or the competent authority.</p> <p>E. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a danger to their safety or health; and</p> <p>F. Collectively select safety and health representatives.</p>		<p>Discussions during the site visit confirmed that workers have access to their personal health monitoring data. However, no information was available to confirm this right was explicitly communicated.</p> <p>Signage noted in many places in and around the mine repeats the required rights and obligations under South African law.</p>
3.2.3.2.	<p>In all cases a worker attempting to exercise any of the rights referred to in 3.2.3.1 in good faith shall be protected from reprisals of any sort.</p>		<p>The evidence provided confirms that the company has policies in place protecting workers from reprisal for exercising their right to refuse work or withdraw from work. During interviews, however, some workers with business partners (contractors) reported that workers had been threatened with termination for attempting to unionize.</p>
3.2.3.3.	<p>The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety.</p>		<p>Provided evidence demonstrates that the Amandelbult Complex has various engagement platforms for participation of workers.</p> <p>A Communication and Consultation document has been completed and a process deployed. The site provided the grievance procedure as a supporting document.</p>
3.2.3.4.	<p>The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:</p> <p>A. Health and safety hazard identification and assessment;</p>		<p>Provided evidence demonstrates that the company has various processes for involving workers' representatives in health and safety hazard assessments, design and implementation of health monitoring and surveillance, risk prevention and mitigation, and health and safety support systems.</p> <p>Evidence supplied included evidence of support programs such as employee wellness programs, means of accessing same, etc. Programs included mental health, relationships, HIV, substance-abuse, etc.</p> <p>Numerous monitoring programs were in place for ambient noise, air quality, and related worker surveillance where appropriate.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>B. Design and implementation of workplace monitoring and worker health surveillance programs;</p> <p>C. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and</p> <p>D. Development of appropriate assistance and programs to support worker health and safety, including worker mental health.</p>		The site hospital was suitably equipped and staffed.
3.2.3.5.	<p>The operating company shall provide workers' health and safety representatives with the opportunity to:</p> <p>A. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace;</p> <p>B. Monitor and investigate safety and health matters;</p> <p>C. Have recourse to advisers and independent experts; and</p> <p>D. Receive timely notice of accidents and dangerous occurrences.</p>	☑	<p>Provided evidence confirms that workers' health and safety representatives have the opportunity and obligation to participate in inspections and investigations, monitor and investigate health and safety matters, have access to technical experts and be informed of dangerous incidents and occurrences.</p> <p>The law states that the rights and powers of safety representatives include the right to be assisted by a consultant or technical expert. The evidence provided did not confirm that workers' health and safety representatives could access independent experts. However, the representatives could involve government agency support to enforce this requirement.</p>
3.2.3.6.	<p>Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering.</p>	☑	<p>Provided evidence confirms that visitors and other third parties will receive a suitable health and safety briefing. The provision of necessary personal protective equipment (PPE) is not confirmed in the provided evidence or rationale but is noted in other supplied evidence (see 3.2.4.1)</p> <p>Workers observed during the assessment were provided with appropriate PPE.</p>
3.2.4.1.	<p><b>Critical (a and b)</b> The operating company shall implement measures to protect the safety and health of workers including:</p>	●	<p>Provided evidence confirms the company implements measures to meet the criteria requirements.</p> <p>~11,000 people go underground daily.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>A. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;</p> <p>B. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;</p> <p>C. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;</p> <p>D. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;</p> <p>E. Providing adequate supervision and control on each shift; and</p> <p>F. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</p>		<p>There are multiple processes to track and locate personnel, including an underground Wi-Fi system with multiple beacons that detect lamps.</p> <p>Additionally, the mine-rescue system has a portable system with a location device.</p> <p>There is proximity detection for locations and trialing, along with a similar system for winch proximity.</p> <p>Several concerns noted during the initial on-site assessment indicated that understanding of risks and/or training in such risks and appropriate controls was not always effective. Issues included:</p> <ul style="list-style-type: none"> <li>- Hazardous waste, waste management areas, and mixed waste risks were not managed effectively. Waste segregation areas were messy and disorganized, creating a variety of hazards. Most notably, explosive wastes (oxidizers) are frequently mixed with many other uncharacterized wastes without consideration for compatibility.</li> <li>- There were also several instances of oxygen and acetylene cylinders not being managed according to best practices.</li> <li>- Control measures to prevent drowning at the 49-pollution control dam were not effectively implemented.</li> </ul> <p>When interviewed, workers involved in the above activities were largely unaware of the noted risks.</p> <p>Status from the follow-up assessment:</p> <p>Corrective actions were developed and implemented to address all observed concerns.</p> <ul style="list-style-type: none"> <li>- Procedures for the use of gas cylinders had been updated, and the auditor was able to verify implementation at the shafts. All gas cylinders (oxygen and acetylene) were observed to be secured in a lockable cage with only key personnel having access to the key to prevent uncontrolled use. Training on the use, transport and storage was also provided.</li> <li>- Control measures to prevent drowning at the pollution control dam (49) were found to be in good operational condition. It was also noted that these items were stored in a sealed container to prevent weathering.</li> <li>- Hazardous waste training was arranged to ensure waste sorters are aware of the dangers of explosives and how to manage them at waste sorting areas. Waste segregation areas were cleaned up although there was still some waste observed stored on bare ground, with leaks and spills evident.</li> </ul>




Requirement #	Requirement Text	Rating	Basis for rating
3.2.4.2.	If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers.	✔	Evidence provided confirms that the company has identified several groups of workers for whom special programs have been developed, including women, pregnant women, and HIV/AIDs-related groups. Discussion during the site assessment confirmed that relevant programs are in place.
3.2.4.3.	The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers.	✔	Provided evidence confirms that the company provides toilets, washing and changing facilities both underground and above-ground, and has standards and accountability to ensure they are clean and sanitary. Male and female toilets were noted at various locations underground. The locker and eating facilities were in acceptable condition.
3.2.4.4.	The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows: A. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement: i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period; ii. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary	✔	Provided evidence shows the mine has a process for providing medical treatment and compensating workers in the event they are injured at work. Data was not provided to show whether the mine tracks. A seriously injured worker who can no longer perform original duties will be placed on light duty but fully paid or placed on 75% salary until final pension. Per the host country laws, the Compensation for Occupational Injuries and Diseases Act (COIDA) requires companies, including mine sites and contractors, to comply with the referenced government scheme Act, which provides compensation for work-related injuries and illnesses. The Act also addresses compensation for employees who contract an occupational disease, whether during or after employment. The workers' hospital facility was well-equipped and staffed.

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	<p>they would otherwise normally receive if healthy and working); or</p> <p>iii. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker's employment at the mining project.</p> <p>B. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and</p> <p>C. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation that is equal to or greater than three months' salary of the deceased worker.</p>		
3.2.5.1.	<p>The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures.</p>	✓	<p>The operation has various platforms in place to perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed. Members of the Joint Safety Committee participate in investigations and audits, and full-time health and safety representatives complete the inspections.</p>
3.2.5.2.	<p>The operating company shall carry out workplace monitoring and worker health surveillance to</p>	✓	<p>The evidence provided confirms that the operation has various occupational health monitoring procedures and activities. The operation also has a full time appointed occupational hygienist.</p>




Requirement #	Requirement Text	Rating	Basis for rating
	<p>measure exposures and evaluate the effectiveness of controls as follows:</p> <ul style="list-style-type: none"> <li>A. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals;</li> <li>B. Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests;</li> <li>C. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory;</li> <li>D. Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and</li> <li>E. If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits.</li> </ul>		<p>The monitoring program appeared to be comprehensive and adheres to industry best practices for monitoring both workplace ambient conditions and health effects.</p> <p>Health care and monitoring information was managed appropriately.</p>
3.2.5.3.	<p>Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results.</p>	<p>☑</p>	<p>Provided evidence confirms that the operation has various measures in place to ensure controls, protective measures, health risk assessments, and risk management plans, and training and educational materials will be updated as necessary based on inspection and monitoring results.</p>
3.2.5.4.	<p>The operating company shall ensure that all workplace injuries, fatalities, accidents, and dangerous occurrences, as defined by national laws or regulations, are documented, reported to</p>	<p>☑</p>	<p>Provided evidence confirms that the operation has a procedure in place to ensure that workplace injuries, fatalities, accidents, and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the</p>

Requirement #	Requirement Text	Rating	Basis for rating
	the competent authority, investigated and that appropriate remedial action is taken.		competent authority, and investigated, and that appropriate remedial action is taken. Any incident resulting in a lost day, or more, is reported.
3.2.6.1.	The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities, and dangerous occurrences collected by the company and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, shall be available to workers' health and safety representatives.	✔	Provided evidence demonstrates that Amandelbult Complex maintains accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; data related to occupational injuries, diseases, accidents, fatalities, and dangerous occurrences is collected by the company and submitted to competent authorities.
3.2.6.2.	The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the health data management system.	✔	A data management system enables medical surveillance records and other worker health data to be readily located and retrieved, and data protected by medical confidentiality is securely stored in place at Amandelbult Complex. Data will be stored for 40 years after mine closure.
3.2.6.3.	The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations.	✔	There are separate systems for incidents, medical data, and incident data that can be accessed via computer for those with a username and password. All other requests will be met via a system administrator. Workers do have a right to access such information but can't access their personal medical data directly.
<b>Chapter 3.3—Community Health and Safety</b>			
3.3.1.1.	<b>Critical</b> The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the	●	Evidence reviewed shows that community, health, and safety impacts caused by general mining operations, operation of mine-related equipment, mine vehicles on public roads, operational incidents, and failure of structural elements (including tailings storage facilities) have been identified and mitigation




Requirement #	Requirement Text	Rating	Basis for rating
	<p>following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> <li>A. General mining operations;</li> <li>B. Operation of mine-related equipment or vehicles on public roads;</li> <li>C. Operational accidents;</li> <li>D. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);</li> <li>E. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);</li> <li>F. Mining-related effects on community demographics, including in-migration of mine workers and others;</li> <li>G. Mining-related impacts on availability of services;</li> <li>H. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and</li> <li>I. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDS, tuberculosis, malaria, and Ebola virus disease) that could occur as a result of the mining project.</li> </ul>		<p>measures developed to manage these impacts. A comprehensive community health and safety baseline includes important information on communicable and sexually transmitted diseases (including HIV/AIDS and TB). The Sustainable Mining Plan identifies impacts to the receiving socioeconomic environment and identifies mitigation measures related to pressure on housing, infrastructure, and service delivery due to an influx of people. The Sustainable Mining Plan also identifies impacts and mitigation measures specific to hazardous materials and priority ecosystems are not explicitly measured nor are mitigation measures provided.</p> <p>The risks associated with illnesses and deaths from hazardous chemicals and pollution are not included in the Community Health Program but are addressed as part of other environmental health programs. Impacts and mitigation specific to hazardous materials and priority ecosystems are not explicitly measured nor are mitigation measures provided.</p>
3.3.1.2.	<p>Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure).</p>		<p>Risks and Impacts throughout the lifecycle of the mine, specific to community health and safety, have been assessed at a high level that requires a more detailed assessment.</p>
3.3.1.3.	<p>Scoping shall include consideration of the differential impacts of mining activities on</p>		<p>Page 25-27 of the Sustainable Mining Plan identify vulnerable groups that originated from the Human Rights Assessment, with a high-level analysis of</p>

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	vulnerable groups or susceptible members of affected communities.		those groups including those vulnerable to emergency planning and disaster response (see COVID-19 screening and testing rollout evidence).
3.3.2.1.	The operating company shall carry out an assessment of risks and impacts to: <ul style="list-style-type: none"> <li>A. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping;</li> <li>B. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable.</li> </ul>	☑	A recent Safety and Human Rights Impact and Risk Analysis exercise has been undertaken to identify and quantify risks and impacts, including community health and safety using an appropriate methodology.
3.3.3.1.	The operating company shall document and implement a community health and safety risk management plan that includes: <ul style="list-style-type: none"> <li>A. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and</li> <li>B. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective.</li> </ul>	⊕	For "significant" risk ratings, controls have been introduced. Evidence included how monitoring is undertaken but success / failure was not evident in the worksheet.
3.3.3.2.	Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation.	●	Mitigation for significant impacts and risks focused on avoidance wherever possible.
3.3.3.3.	The community health and safety risk management plan shall be updated, as necessary, based on the results of risk and impact monitoring.	☑	Based on the status of site risk monitoring and controls, the operation frequently updates the risk management plan with relevant stakeholders as necessary.
3.3.4.1.	If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another	●	The operation conducted a Health Baseline Study in partnership with public health agencies, including Platinum Health, to address those with HIV / AIDS, substance abuse focused, and other relevant stakeholders from host communities.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:</p> <p>A. In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining;</p> <p>B. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and</p> <p>C. Make information publicly available on its infectious disease mitigation program.</p>		<p>The Social Performance Priority Unwanted Events does contain references to HIV/AIDS being an unwanted event as a result of the various mining phases (expansions, shaft closure etc.). The current controls include:</p> <ol style="list-style-type: none"> <li>1. Social and Labour Plan</li> <li>2. Corporate Social Investment (CSI) initiatives</li> <li>3. Engagement with stakeholders</li> <li>4. Health Programmes and campaign</li> </ol> <p>No evidence of associated management plans and additional controls was made available for review.</p> <p>COVID-19 management is included in the draft Social and Human Rights Impact and Risk Analysis Management Plan.</p>
3.3.4.2.	<p>If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:</p> <p>A. In relation to HIV/AIDS, the operating company shall, at minimum:</p> <ol style="list-style-type: none"> <li>i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;</li> <li>ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate;</li> <li>iii. Provide access for contractors to education and other preventative</li> </ol>		<p>The site did not provide rationale for rating in their self-assessment. However, an auditor rating was given based on Amandelbult commitment and implementation of the 'Know your Status Campaign' and Monitoring and Evaluation measures for employees related to community health and safety.</p> <p>During engagement with the respective stakeholders, HIV/AIDS was not considered as a key topic given the stigma associated with it in the surrounding communities. As a result, the audit team prioritized more relevant topics to this area given the social landscape.</p> <p>This topic will be assessed in the surveillance audit.</p>





Requirement #	Requirement Text	Rating	Basis for rating
	<p>programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and</p> <p>iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members.</p> <p>B. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.</p> <p>C. In relation to malaria, the operating company shall, at minimum:</p> <ul style="list-style-type: none"> <li>i. Develop a vector control plan;</li> <li>ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and</li> <li>iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing.</li> </ul>		
3.3.5.1.	<p>The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in:</p> <ul style="list-style-type: none"> <li>A. Scoping of community health and safety risks and impacts related to mining;</li> <li>B. Assessment of significant community health and safety risks and impacts related to mining;</li> </ul>	⊕	<p>Community health and safety considerations have been fully explored by the mine and indicate mining-related impacts on priority ecosystem services with community members, particularly during the COVID-19 pandemic; however, community engagement and roles in process were not included in the evidence.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>C. Development of prevention or mitigation strategies;</p> <p>D. Collection of any data needed to inform the health risk and impact assessment process; and</p> <p>E. Design and implementation of community health and safety monitoring programs.</p>		
3.3.6.1.	The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.	✓	Amandelbult demonstrates that they share information on community health and safety risks and impacts and monitoring results through public platforms.
<b>Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas</b>			
	Chapter not assessed	—	IRMA is not scoring this chapter in 2022 but only collecting information to help inform future guidance on chapter implementation.
<b>Chapter 3.5—Security Arrangements</b>			
3.5.1.1.	The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force.	✓	<p>There is a policy in place that seeks to protect the human rights of employees, contractors, communities and other involved third parties.</p> <p>The policy is signed (i.e., acknowledged and committed to) by the Senior Service Protection Services Manager, Manager of Governance and Risk, Head of Protection Services, Head of Sustainability, Senior Employee Relations Manager, Executive Head of Corporate Affairs and Executive Head of Process.</p> <p>The policy includes specific requirements for selecting a private security contractor and considers the contractor's human rights record, including use of force.</p> <p>The general intent of the requirement is being met.</p>

Requirement #	Requirement Text	Rating	Basis for rating
3.5.1.2.	<p><b>Critical</b> The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:</p> <ul style="list-style-type: none"> <li>A. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;</li> <li>B. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and</li> <li>C. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury.</li> </ul>		<p>There is a policy in place for use of force (Group Procedure, Use of Force, version 2.0, 30 August 2018).</p> <p>There is a procedure in place for use of firearms (Platinum Procedure, Control of Firearms and Ammunition, version 2.0, 28 August 2018).</p> <p>The general intent of the requirement is being met. However there is no clear reference to exercise restraint and utilize non-violent means, or the other 2 sub-requirements.</p>
3.5.1.3.	<p>If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:</p> <ul style="list-style-type: none"> <li>A. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms;</li> <li>B. Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and</li> <li>C. Outlines required training for security personnel.</li> </ul>		<p>There is a signed service level agreement between the operating site and a private service provider (White Leopard Security Services) that demonstrates the private security contractor has agreed to the principles and conformance of use of force as per signed contract.</p> <p>Voluntary Principles on Security and Human Rights Policy training outlined in agreement and demonstrates an evidence of security training register and training material.</p> <p>The general intent of the requirement is being met.</p>
3.5.1.4.	<p>If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or</p>		<p>There is a documented memorandum of understanding (MoU) with local public security stakeholders. The MoU does not refer to provisions specific to human rights / use of force / firearms.</p>






Requirement #	Requirement Text	Rating	Basis for rating
	similar agreement with public security providers that includes similar provisions to those in 3.5.1.3.		
3.5.2.1.	The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment.	✓	The most recent Workplace Risk Assessment and Control undertaken for the Amandelbult lifecycle considers 36 risks and impacts specific to human rights of both internal and external stakeholders.
3.5.2.2.	Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall: A. Follow a credible process/methodology; B. Be carried out and documented by competent professionals; and C. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice.	●	There is documented evidence showing that credible process/methodology followed and conducted by competent personnel in risk and protection services. Social performance staff (including women) were involved in the Workplace Risk Assessment and Control update process. Social and Human Rights Impact and Risk Analysis results include consideration of vulnerable groups and a human rights policy.
3.5.2.3.	The scope of the security risk assessment shall include, but need not be limited to: A. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups; B. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption);	●	a. Identification of security risks to company, workers and communities was undertaken, but there is limited identification of risks to vulnerable groups. b. A high-level analysis of the political and security context of the country and current and potential conflicts was undertaken. c. The Social and Human Rights Impact and Risk Analysis includes community powerbrokers that could affect investigations through governance decision-making. No other socio-political risks were identified. d. Identification of risk associated with equipment transfers was included under hijackings.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>C. Analysis of current and potential conflicts or violence in the host country and affected communities; and</p> <p>D. Risks associated with equipment transfers.</p>		
3.5.2.4.	The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective.		<p>The Social and Human Rights Impact and Risk Analysis reflects management and mitigation measures, including limited monitoring and improvement measures.</p> <p>The Risk Monitoring Plan only addresses significant and major risks, none of which are related to security infringement on human rights.</p>
3.5.2.5.	If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children, and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform to requirements in IRMA Chapter 1.3.		<p>Communication on human rights and security is disseminated through leadership forums, however specific considerations to vulnerable groups are not included.</p> <p>There is no evidence to show engagement outcomes (meeting minutes) where communities / employees agree to appropriate mitigation measures.</p>
3.5.3.1.	The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.		Amandelbult has developed and implemented extensive due diligence procedures for the hiring of security personnel and security providers.
3.5.3.2.	The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the		Amandelbult has made good faith efforts to determine if South Africa Police Service personnel have been convicted of or credibly implicated in human rights abuses. However, Amandelbult has limited power over the South Africa Police Service and cannot control security and human rights outcomes where they are

Requirement #	Requirement Text	Rating	Basis for rating
	infringement of human rights, breaches of international humanitarian law or the use of excessive force.		involved. There have been multiple engagements with South Africa Police Service to underpin/encourage and promote Voluntary Principles on Security and Human Rights principals and has signed an MoU to demonstrate good faith.
3.5.4.1.	Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with reference to vulnerable groups, and the company's policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers.	✔	Amandelbult (through protection services) provides induction and refresher training courses to private security personnel, specific to Voluntary Principles on Security and Human Rights. All security employees are required to undertake training (Voluntary Principles on Security and Human Rights certificates were provided). Training is comprehensive and includes respect for human rights and the Anglo American Platinum policy on the appropriate use of force and firearms. Human rights related to vulnerable groups was provided relating to women and children.
3.5.4.2.	If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security.	●	Amandelbult has made good faith efforts to determine if South Africa Police Service personnel have been convicted of or credibly implicated in human rights abuses. However, has limited power over the South Africa Police Service and cannot control security and human rights outcomes where they are involved.
3.5.5.1.	The operating company shall: A. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force; B. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company's policies on rules of engagement, the use of	●	Several monitoring systems are in place to document and investigate security incidents. Specific security incidents relating to human rights are included in the Voluntary Principles on Security and Human Rights Policy Central Register. a. Incidents are managed through multiple platforms and tools including, the incident management committee, crime incident monthly records, crime incident reports (compared annually), Anglo American policy documents for guiding employee behavioral, weekly crime incidents reports, monitoring violent crime and incident register. b. Appropriate actions were demonstrated in evidence where security incidents relating to human rights are reported.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>force and firearms, human rights, and other relevant policies;</p> <p>C. Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers;</p> <p>D. Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings;</p> <p>E. Provide medical assistance to all injured persons, including offenders; and</p> <p>F. Ensure the safety of victims and those filing security-related allegations.</p>	+	<p>c. An internal procedure is in place. The "Behavioral Procedure" covers management of employee behavior, and the "incident Management procedure" covers the process to be followed; however, there is no evidence of remediation for the victims.</p> <p>d. There is no specific human rights reporting process. Incidents are managed through multiple platforms and tools including, the incident management committee, crime incident monthly records, crime incident reports (compared annually), Anglo American policy documents for guiding employee behavioral, weekly crime incidents reports, monitoring violent crime and incident register. Appropriate actions were demonstrated where security incidents relating to human rights are reported.</p> <p>e. There was no specific evidence or procedure provided; however, any incidents within the Anglo American property or associated activities outside of the property will be managed in line with health and safety processes and policies.</p> <p>f. The system allows for anonymous and gender considerate reporting of incidents through the incident management system and committee. Incident reporting for vulnerable groups could be more specialized to protect the rights of the vulnerable.</p>
3.5.5.2.	<p>In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents.</p>	+	<p>Incidents are shown to be investigated thoroughly but not always communicated to stakeholders.</p> <p>Stakeholders are not always given a platform to discuss how such incidents can be better managed / prevented.</p> <p>Information is provided to stakeholders on outcomes/incident occurrences; however, details of the process and investigation are not demonstrated to stakeholders.</p>
3.5.6.1.	<p>If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms.</p>	+	<p>Stakeholders were consulted on human resources and security and gave input as required. Stakeholders are consulted on Human Rights issues and other social issues during Leadership Development Forum meeting and members are taken through the Social Risk Management Plan for input.</p> <p>However there is no evidence of specific consultation with vulnerable and other community groups beyond the Leadership Development Forum on these issues.</p>

Requirement #	Requirement Text	Rating	Basis for rating
3.5.6.2.	The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights.		Stakeholders were consulted on human resources and security and gave input as required. Stakeholders are consulted on Human Rights issues and other social issues during Leadership Development Forum meeting and members are taken through the Social Risk Management Plan for input.  However there is no evidence of specific consultation with vulnerable and other community groups beyond the Leadership Development Forum on these issues.
3.5.6.3.	Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security.		Stakeholders were consulted on human rights security and given input as required. The grievance mechanism is communicated through the mine's newspaper (Amandelbult Times) and Leadership Development Forum, and business forums are conducted for security incidents. Pamphlets are distributed via on-store counters, and posters are placed in public community areas (shop notice boards).
3.5.6.4.	If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns.		There is a publicly available due diligence report on public security undertaken by Amandelbult in 2019. Due diligence was publicly available and demonstrates agreement / responsibility division relating to security between Amandelbult and South Africa Police Service.
<b>Chapter 3.6—Artisanal and Small-Scale Mining</b>			
	Chapter Not Relevant	—	After on-site investigation and consultation with the company, it was determined that Artisanal and Small-Scale Mining was not occurring at the site and or in the vicinity of the site, therefore Chapter 3.6 was considered “Not Relevant”.
<b>Chapter 3.7—Cultural Heritage</b>			

Requirement #	Requirement Text	Rating	Basis for rating
3.7.1.1.	Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals.	✓	The Integrated Heritage Management Plan was developed by a qualified and accredited professional in South Africa. Manager interviews and supporting evidence indicates its ongoing implementation by the site, with a new Cultural Heritage Resources Management process started in 2022.
3.7.1.2.	Screening, assessment and the development of mitigation measures and procedures related to the management of cultural heritage shall include consultations with relevant stakeholders.	✓	Evidence provided indicates that traditional authorities and community leadership were consulted in preparation of the Integrated Heritage Management Plan. On-site interviews and additional evidence indicate that consultations with stakeholders are continuing as the plan is implemented. On-site interviews confirmed traditional authority participation in Integrated Heritage Management Plan development.
3.7.1.3.	Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues.	✓	Evidence provided indicates that stakeholders were consulted with respect to the Integrated Heritage Management Plan, but additional evidence indicates that the related assessment was not concluded. Leadership of traditional authorities has been allowed to view the draft plan, but additional ongoing consultations are required to verify the plan and fill any informational gaps.
3.7.2.1.	Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities.	●	Evidence provided indicates that all new components to the Amandelbult complex underwent a Heritage Impact Assessment during the Environmental Impact Assessment phase. Additional evidence provided indicates that the cultural heritage assessment was not concluded and consultations with stakeholders are ongoing to verify findings and fill any informational gaps. On-site interviews confirmed traditional authority participation in Integrated Heritage Management Plan development.
3.7.2.2.	If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5	✓	Heritage impact assessments provide mitigation and management plans as part of environmental impact assessment. The Integrated Heritage Management Plan consolidates management and mitigation of identified heritage resources. Additional evidence indicates a cultural heritage assessment is being concluded with stakeholder participation to fill any information gaps. On-site interviews confirm traditional authority participation in developing the Integrated Heritage Management Plan.

Requirement #	Requirement Text	Rating	Basis for rating
	and 3.7.6), based on the type of cultural heritage likely to be affected.		
3.7.3.1.	<p>When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply:</p> <ul style="list-style-type: none"> <li>A. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it;</li> <li>B. Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it;</li> <li>C. Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and</li> <li>D. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage.</li> </ul>	✔	Evidence provided indicates the site has developed a process for how to manage chance finds of tangible cultural heritage. Graves are being maintained in situ where applicable. Cultural Heritage Resources Management is ongoing and will include stakeholder consultations to fill any informational gaps. On-site interviews confirm traditional authority representatives were consulted in developing the Integrated Heritage Management Plan.
3.7.3.2.	All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.	✔	The Integrated Heritage Management Plan was developed and is being implemented by a qualified and accredited professional in South Africa. Additional evidence indicates that implementation of cultural heritage mitigations and further assessment to fill informational gaps is being undertaken by competent professionals, with participation from management and stakeholders.

Requirement #	Requirement Text	Rating	Basis for rating
3.7.4.1.	<p>The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:</p> <ul style="list-style-type: none"> <li>A. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and</li> <li>B. Any removal of cultural heritage is conducted using the best available technique.</li> </ul>	—	<p>Not relevant because the site has not encountered and has not predicted finding tangible non-replicable cultural heritage to be affected by mining-related activities.</p> <p>No evidence was provided or raised during on-site interviews that non-replicable cultural heritage has been removed. The Chance Find Procedure does not speak specifically to identification of non-replicable cultural heritage. Additional evidence indicates cultural heritage assessment is being concluded with stakeholder participation to fill any information gaps. On-site interviews confirm traditional authority participation in developing the Integrated Heritage Management Plan.</p>
3.7.4.2.	<p>All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.</p>	—	<p>Not relevant because there was no documented evidence of non-replicable cultural heritage was provided or referred to during on-site interviews. The Integrated Heritage Management Plan was developed and is being implemented by qualified and accredited professionals in South Africa. A new Cultural Heritage Resources Management process was started in 2022. The Chance Find Procedure does not speak specifically to identification of non-replicable cultural heritage.</p>
3.7.5.1.	<p>Except under exceptional circumstances, the operating company shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:</p> <ul style="list-style-type: none"> <li>A. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and</li> <li>B. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the</li> </ul>	—	<p>This requirement is not relevant because no critical cultural heritage has been encountered nor is predicted to be affected by mining-related activities.</p> <p>Evidence provided, supported by on-site interviews does not suggest critical cultural heritage has been removed, damaged, or altered. A new Cultural Heritage Resources Management process has been started, with stakeholder participation to fill any information gaps.</p>



Requirement #	Requirement Text	Rating	Basis for rating
	mutually accepted negotiation process and outcomes. (Note: Where impacts may occur to indigenous peoples' critical cultural heritage, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples).		
3.7.5.2.	<p>When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:</p> <ul style="list-style-type: none"> <li>A. Comply with the requirement 3.7.5.1;</li> <li>B. Comply with the protected area's management plan;</li> <li>C. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and</li> <li>D. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area.</li> </ul>	—	The site is not a new mine and is not located within a protected cultural heritage area.
3.7.5.3.	<p>IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).</p> <ul style="list-style-type: none"> <li>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;</li> <li>• International Union for Conservation of Nature (IUCN) protected area management categories I-III;</li> <li>• Core areas of UNESCO biosphere reserves.</li> </ul>	—	The site is not a new mine and is not located within any protected area referred to in 3.7.5.3.

Requirement #	Requirement Text	Rating	Basis for rating
3.7.5.4.	<p>An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:</p> <ul style="list-style-type: none"> <li>A. The mine was developed prior to the area's official designation;</li> <li>B. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the cultural values for which the area was designated or recognized; and</li> <li>C. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan.</li> </ul>	—	The site is not located within any protected area referred to in 3.7.5.3.
3.7.5.5.	To safeguard irreplaceable cultural heritage and respect indigenous peoples' right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation.	☑	No indigenous populations or individuals have been identified in the broader area. The mine has not carried out new exploration or development in areas known to be inhabited by indigenous peoples living in voluntary isolation.
3.7.6.1.	Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development.	☑	Interviews do not suggest the site uses any cultural heritage or knowledge for commercial purposes.
3.7.6.2.	The operating company shall not proceed with such commercialization unless it:	☑	Interviews do not suggest the site uses any cultural heritage or knowledge for commercial purposes.


Requirement #	Requirement Text	Rating	Basis for rating
	<p>A. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and</p> <p>B. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions.</p>		
3.7.6.3.	Where the operating company proposes to use indigenous peoples' cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples.	—	Interviews do not suggest the site uses any cultural heritage or knowledge for commercial purposes.
3.7.7.1.	A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage.	☑	The Integrated Heritage Management Plan provided includes an "Action Program" that incorporates identified action, outcomes, indicators, stakeholders, and timeframes for implementation to protect tangible and intangible cultural heritage. A new Cultural Heritage Resources Management process has been started, with stakeholder participation to fill information gaps.
3.7.7.2.	<p>If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:</p> <p>A. Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed;</p> <p>B. Managing potential impacts to</p> <p>C. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and</p>	☑	Evidence provided and on-site interviews indicate compliance with 3.7.7.2. Subsection d. does not apply since no indigenous peoples have been identified in the mine area.



Requirement #	Requirement Text	Rating	Basis for rating
	D. If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage.		
3.7.7.3.	The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management.	✓	On-site interviews indicate implementation of the Chance Find Procedure, with workers aware of the procedure and training provided as required.

## Principle 4: Environmental Responsibility

### RATING LEGEND



Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant



Requirement #	Requirement Text	Rating	Basis for rating
<b>Chapter 4.1—Waste and Materials Management</b>			
4.1.1.1.	The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities.		Reviewed documents show a waste management program that is inclusive of all mine waste streams. The Anglo American Platinum Leaders Guide to Waste 2021 is signed by the CEO, raising awareness for the Zero Waste to Landfill (ZW2L) initiative along with general waste responsibilities and requirements. The site is a self-declared Zero-Waste-To-Landfill site and receive an external audit to determine achievement of this objective.
4.1.1.2.	The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum: <ul style="list-style-type: none"> <li>A. Having the policy approved by senior management and endorsed at the Director/Governance level of the company;</li> <li>B. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and</li> </ul>		The Waste Management Procedure has been approved by senior management, endorsed at the governance level, and is made available to employees. On-site assessment of the salvage and waste storage facilities used to sort and separate waste generated underground identified some concerns with respect to how general and hazardous waste is being managed. Concerns include the lack of effective controls to prevent tracking and scattering of waste outside of the salvage yards, significant accumulation, and backlog of waste to be sorted and separated creating unsafe conditions, and comingling of hazardous waste without sufficient identification or evaluation of compatibility.


Requirement #	Requirement Text	Rating	Basis for rating
	<p>function, and that they have the competencies necessary to fulfill their responsibilities;</p> <p>C. Having procedures and/or protocols in place to implement the policy; and</p> <p>D. Allocating a sufficient budget to enable the effective implementation of the policy.</p>		
4.1.2.1.	<p>The operating company shall:</p> <p>A. Identify all materials, substances, and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment, or communities; and</p> <p>B. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances, and wastes.</p>	⊕	<p>Amandelbult has identified all materials, substances, and wastes (other than mine wastes) associated with the mining project that pose a potential hazard to health, safety, or the environment. The site has also conducted issue-based risk assessments related to handling, sorting, and transportation of waste to and from salvage yards. On-site assessment of the salvage and hazardous waste storage facilities identified that procedures for the safe handling, storage and disposal of general and hazardous wastes are not being effectively implemented to achieve intended outcomes.</p>
4.1.3.1.	<p>The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, which could lead to impacts on human health, safety, the environment, or communities.</p>	☑	<p>A tailings dam, waste rock dumps and domestic and hazardous waste salvage facilities are in place and have been identified, mapped, and documented. Consequence classification for tailings storage facilities was recently updated in September 2021.</p>
4.1.3.2.	<p>The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:</p> <p>A. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW).</p> <p>B. Source material characterization using industry best practice to determine potential for acid</p>	⊖	<p>According to the evidence provided, geological and hydrological characterization and projected climate change effects on each mine waste facility have been documented. These aspects are well understood for certain areas of the site and the area around the site. The site was a part of a multi-site assessment of mine residue deposits with respect to the Waste Classification and Management Regulations of the National Environmental Management Waste Act. The Adden tailings dam extension 2002 characterizes the site and hydrology in detail. A 2019 hydrological study and 2020 groundwater modelling update study bring some of the site characterization information up to date. No specific potential for acid rock drainage (ARD) or metals leaching (ML) has been identified.</p>





Requirement #	Requirement Text	Rating	Basis for rating
	<p>rock drainage (ARD) or metals leaching (ML). This shall include:</p> <ul style="list-style-type: none"> <li>i. Analysis of petrology, mineralogy, and mineralization.</li> <li>ii. Identification of geochemical test units.</li> <li>iii. Estimation of an appropriate number of samples for each geochemical test unit; and</li> <li>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.</li> </ul> <p>C. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways, and receptors for each facility.</p> <p>D. Water balance and chemistry mass balance models for each facility; and</p> <p>E. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants.</p>		<p>The site-wide water balance model of 2020 evaluates various water management options and informs a water management strategy.</p> <p>It was not clear from evidence provided if source characterization has been completed. However, a copy of a contract to conduct such work was provided.</p>
4.1.3.3.	<p>The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment, or communities. Evaluations shall be informed by the following:</p> <ul style="list-style-type: none"> <li>A. Detailed engineering reports, including site investigations, seepage, and stability analyses.</li> <li>B. Independent technical review (See criteria 4.1.6)</li> <li>C. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment.</li> <li>D. Description of facility design criteria.</li> </ul>	✔	<p>Risk assessment and monitoring of mine residue deposits is in place, including understanding failure modes for tailing storage facilities and developing mitigations and response plans. Studies have been conducted to generate a master tailings placement plan, site water balance, and detailed engineering and stability analysis. An independent technical review and internal and external inspection is carried out, including reporting made on safety and integrity.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>E. Design report(s).</p> <p>F. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns.</p> <p>G. Master tailings placement plan (based on life of mine);</p> <p>H. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report.</p> <p>I. Facility water balances (See also 4.1.3.2.d); and</p> <p>J. Dam breach inundation (if applicable) and waste rock dump runout analyses.</p>		
4.1.3.4.	Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.		<p>Unable to confirm from evidence reviewed that facility characterizations have been updated at a frequency commensurate with the risk profile of the facility. Neither a procedure for the periodic review and update, nor a mechanism of tracking was found in supplied evidence. The Adden tailings dam Ext 2002 characterizes the site and hydrology in detail but is dated. A 2019 hydrological study and 2020 groundwater modelling update study bring some of the site characterization information up to date. The 2021 groundwater modelling upgrade will be informed by the proposed scavenger wells and piezo installations and will generate new information to better understand risks to hydrogeology and hydrology at the site. It is intended that this information be used for wider purposes, to be fully determined in 2022 when initial results were generated.</p>
4.1.3.5.	Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected.		<p>Evidence provided confirms that waste was evaluated according to Waste Classification and Management Regulations but does not demonstrate that waste facilities were characterized using predictive tools and models consistent with industry best practice. Also, there is no evidence to verify they were updated over the life of the mine, as necessary, based on new data, monitoring results or changes to the mining project. Goldsim modelling is currently in use and there is a program to update this with real data from boreholes in the groundwater modeling upgrade project. Modeling information to date has not been specifically used for mine waste facility characterization but does provide vital information of risks to the groundwater resource.</p>







Requirement #	Requirement Text	Rating	Basis for rating
4.1.4.1.	<p><b>Critical A</b> risk-based approach to mine waste assessment and management shall be implemented that includes:</p> <ul style="list-style-type: none"> <li>A. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle.</li> <li>B. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment, and communities early in the life cycle.</li> <li>C. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and</li> <li>D. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).</li> </ul>		<p>Evidence shows that a risk-based assessment has been conducted for mine waste facilities but not for each facility individually (except for slope failure evaluation of tailing storage facilities).</p> <p>Initial impact assessments considered risks of all potential risks at the site, and this has been revisited during any significant change at the site relating to operations, assets, or site. This is fully inclusive of hazardous material and chemicals' risks and an up-to-date inventory of the same is maintained.</p> <p>The risk assessment evaluates the potential Health, Safety and Environmental impacts of mine waste facilities on health, at different stages of the mine's life cycle. On an ongoing basis, the health and safety risks are considered through work permitting.</p> <p>An internal audit (self-assessment - mineral residue facilities and water management structures) of July 2021 reports that a 'Risk Assessment report shall be prepared for each mineral residue facility within the Group. The level of detail of the Risk Assessment depends on the Consequence Classification of Structures rating for that facility.</p>
4.1.4.2.	<p>The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:</p> <ul style="list-style-type: none"> <li>A. Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses.</li> <li>B. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives.</li> <li>C. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications.</li> <li>D. Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which considers environmental,</li> </ul>		<p>No documented 'Alternatives Assessment' or similar was available for review. The Environmental Impact Assessment / Environmental Management Plan does not include any alternative assessments as stated in rationale. Investment criteria describes a process for considering waste facility designs during project development but there were no records provided during the Stage 1 assessment to show that alternative locations were considered and analyzed as required. Initial impact assessments were carried out at the beginning of the mine's life cycle and new assets were added over time. The Environmental Impact Assessment / Environmental Management Plan reports include discussion on alternatives, and optimum locations are justified in the reporting and the subsequent local authority approval process. The facilities at the mine are legacy assets, and no alternatives have been considered to locate them, although no such study or review to determine that this is not necessary has been conducted either.</p>





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	<p>technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative.</p> <p>E. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and</p> <p>F. Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management).</p>		
4.1.5.1.	<p><b>Critical Mine</b> waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).</p>		<p>Review of recent inspection reports from consultants and the Technical Review Panel, along with on-site observations found that the site's facility design and mitigation with respect to identified risks related to mine residue storage and waste management are not consistent in all instances with best available technologies and practices. Specifically, the on-site tour identified issues related to solid waste management from sub-surface activities, vegetation management and legacy design standards for pollution control dams and the tailings storage facility.</p> <p>Follow-up Assessment Updates:</p> <p>Amandelbult's Tailings Storage Facility maintenance requirements are addressed in the attached Operations, Maintenance, and Surveillance Manual dated May 2022.</p> <p>Quarterly meetings are undertaken as part of the tailing facility management between the Anglo American Amandelbult tailings engineer and Fraser Alexander who have been appointed to operate the facility on behalf of Anglo American Amandelbult.</p> <p>A letter received from the Record of Engineer (SRK Consulting) indicates that it is essential to maintain the vegetation on the slopes to manage slope stability risks, and it was recommended that the tamarisk replacement program with preferred local vegetation be followed to allow the side slope stability management approach to be maintained.</p>

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4.1.5.2.	<p>Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:</p> <ul style="list-style-type: none"> <li>A. Priority shall be given to source control measures to prevent generation of contaminants.</li> <li>B. Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent or minimize the movement of contaminants to where they can cause harm; and</li> <li>C. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes.</li> </ul>		<p>The rationale provided does not align with criteria to demonstrate full conformity. Provided evidence shows that chemical risks from some mine waste facilities are managed in alignment with the mitigation hierarchy for source control. However, it was not possible to confirm that this approach is applied to all waste streams.</p>
4.1.5.3.	<p>For high consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide.</p>		<p>High consequence facilities and structures have been identified and applicable critical controls are developed. The site is adopting the recent Global Industry Standard on Tailings Management, to keep aligned with a best practice approach.</p>
4.1.5.4.	<p>Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling, and other relevant information.</p>		<p>Personnel with different expertise were involved in waste characterization, analysis, modeling, and assessments. A 2015 waste classification study identifies all waste types expected to arise from mining operations and associated activities. A 2015 mine residue assessment report assessed the mine residue deposits generated at various operations in terms of Waste Classification and Management Regulations. It underpins strategies for more recent changes to operations.</p>
4.1.5.5.	<p>The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls, and closure plan for the facility, that includes:</p>		<p>The Operation, Maintenance and Surveillance Manual applies to the Amandelbult tailings storage facilities 1, 2, 3A and 3B, holding dam, and the return water dam at the Amandelbult Complex. It was developed in response to the South African Standard for Management of Mine Residues, SANS 10286:2013, and includes a monitoring plan. It has since been updated in 2021 and had review and revisions to certain procedures and processes.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>A. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters.</p> <p>B. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices.</p> <p>C. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility.</p> <p>D. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and</p> <p>E. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost.</p>		
4.1.5.6.	<p><b>Critical On</b> a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <p>A. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);</p>	✔	Independent safety inspections, engineer-of-record evaluations, and contractor operator monitoring of mine waste facility performance and control effectiveness take place regularly. Evidence was observed of regular reporting on inspection results and maintenance conditions, with information supporting the management review process. Updates to the Operating,




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	<p>B. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);</p> <p>C. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and</p> <p>D. Inform the management review to facilitate continual improvement (see 4.1.5.8).</p>		Maintenance, and Surveillance Manual are made based in part on the results of engineer-of-record inspections and independent safety inspections.
4.1.5.7.	The OMS manual shall be updated, and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety and prevents or otherwise minimizes harm to the environment and communities.	☑	Mine waste facilities, including tailings storage facilities, holding facilities, return water facilities, and waste rock dumps, have evolved to support the expansion of operations and the addition of new mining shafts since 2009. The Operating, Maintenance and Surveillance Manual was updated in 2019 and again in 2021. An update to the Operating, Maintenance, and Surveillance manual was done in 2021 and involved reviewing all work procedures. Changes are based on inspection findings of the Tailing Storage Facility and other facilities.
4.1.5.8.	<p>The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment, or communities. The review shall:</p> <p>A. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and</p> <p>B. Be documented, and the results reported to an accountable executive officer.</p>	⊕	Annual reviews are conducted to identify and evaluate the potential significance of changes to tailings storage facilities and other mine waste facilities since the previous management review. A management review panel document provided as evidence dated 2019 does not verify that the review has been conducted annually and communicated to an accountable executive officer, as required. Engineering and technical panel reviews are regularly scheduled and include tailing storage facilities and other mine waste facilities. It is understood that the review process is being aligned with the recently published (2019) Global Management Standard for Tailings Management. A management review (attended by principals for Anglo American Group and Anglo American Plats, GM. Eng Manager, Plant manager, Senior Engineer, SRK Team representative) is conducted every 2 years, but is required annually.
4.1.6.1.	The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle.	⊖	The site policy requires a technical review panel, selected to ensure independence, and frequently uses external contractors to provide technical review of siting and management of mine waste facilities. Dam safety reviews and other independent inspection evidence confirm that such reviews have taken place throughout the mine life cycle at a frequency commensurate with the risks posed by the facility or facilities. The government conducts its own

Requirement #	Requirement Text	Rating	Basis for rating
			inspections, but this is for legal compliance only. No report was received by the site for this.
4.1.6.2.	Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body.		The site policy requires a Technical Review Panel, selected to ensure independence, and frequently uses external contractors to provide technical review of siting and management of mine waste facilities. Dam safety reviews and other independent inspection evidence confirm that such reviews have taken place throughout the mine life cycle at a frequency commensurate with the risks posed by the facility or facilities. The government conducts its own check, but this is legal compliance only. No report was received by the site for this.
4.1.6.3.	Independent reviewers shall be objective, third-party, competent professionals.		Evidence was provided by the site, including a statement of independence from contractors retained to conduct independent reviews of mine waste facilities. Qualifications of reviewers were also included in some of the independent reports provided as evidence.
4.1.6.4.	Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner.		Mineral recovery facilities (MRF) and waste management systems (WMS) standards state that the Technical Review Panel will report directly to the general manager of the operation, with copies of reports submitted to the business unit, and to the head of the MRF. The evidence provided shows that external reports were presented and discussed in a meeting with several senior operator personnel in 2016. The most recent Dam Safety Review identifies the following roles at Amandelbult related to dam safety, including the Accountable Executive, the Competent Person, the Engineer of Record, the Deputy Engineer of Record, and the Technical Review Panel. The report states that "following preparation of a list of questions, an online meeting was held with the Engineer of Record, deputy Engineer of Record and Competent Person on Thursday 25 November 2021. No further evidence was provided to support the engagement of the Accountable Executive during this process.
4.1.6.5.	The operating company shall develop and implement an action plan in response to commentary, advice, or recommendations from an independent review, document a rationale for any advice or recommendations that will not be		The performance monitoring requirement in the material recovery facilities and waste management systems standard does not address development of action plans nor the requirement to document rationale for not implementing recommendations. However, a findings tracker has been developed by the site

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	implemented, and track progress of the plan's implementation. All this information shall be made available to IRMA auditors.		for documenting and tracking corrective action plans in response to issues raised during independent reviews, such as independent dam safety reviews.
4.1.7.1.	Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities.		Social Way stakeholder engagement states the requirement to implement a consultation process for relevant stakeholders, but the provided evidence did not confirm that sitting stakeholders were engaged in screening and assessment of the mine waste facility site. As most of the mine waste siting activities took place long before development of the standards, other evidence provided under section 2.5 Emergency Preparedness confirms that community engagement activities take place. The supplied evidence shows that community stakeholders were informed of siting decisions and current design and management but were not consulted.
4.1.7.2.	Emergency preparedness plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers' representatives, and in collaboration with first responders and relevant government agencies. (See also IRMA Chapter 2.5).		The site has an emergency preparedness plan. Evidence presented states that community stakeholders will be engaged in relevant emergency preparedness plans. Minutes of meetings and other documented evidence show engagement with the local community in emergency preparedness but not necessarily consultation. An Emergency Plan is developed in collaboration with relevant regulators and services. It is understood that community stakeholders are consulted on tailings management only on an annual basis when an Emergency Preparedness and Response Plan test is carried out. Following updates to the Tailings Storage Facility consequence ratings, the emergency preparedness plan was updated. Local community members impacted by the updated ratings were not yet consulted with respect to changes to the Emergency Preparedness and Response Plan.
4.1.7.3.	Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. (See also IRMA Chapter 2.5).		The site has conducted emergency and evacuation drills related to catastrophic failure of mine waste facilities on a regular basis. However, nearby communities have not yet been consulted based on the revisions to the Emergency Preparedness and Response Plan, stemming from a change in the consequence rating for the Tailing Storage Facility's dams.
4.1.7.4.	If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance		The company engages with stakeholders in many ways related to mine waste management and reports that it would provide specific information, if requested. This chapter states that any information that relates to the mine's


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	results, independent reviews, and the effectiveness of management strategies.		performance against the IRMA Standard must be made available to relevant stakeholders upon request. No such requests have been received by the site to date.
4.1.8.1.	<b>Critical</b> At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA.	—	Anglo American Amandelbult does not use riverine, submarine or lake disposal of mine waste materials and therefore this is rated as “Not Relevant.”
<b>Chapter 4.2—Water Management</b>			
4.2.1.1.	The operating company shall identify water users, water rights holders and other stakeholders that may potentially affect or be affected by its mine water management practices.	✔	Anglo American's Group Water Policy includes a commitment to "securing water without compromising water resources and other users' and engage to 'build capacity for effective water partnerships". This is backed up by technical and procedural information in the group Water Management Standard and associated Guideline. The environmental impact assessment phase completed by the site identifies stakeholders, and the stakeholder engagement team then initiates contact. The Social and Human Rights Impact and Risk Assessment is used to identify risks and impacts to those stakeholders across a 50km radius from the mine to identify those who are impacted by the mine. Two municipalities, three traditional communities and one Communal Property Association, each with a varying number of villages within each, have been identified. The site has met with leaders of each community in community engagement and water user forums, including the Thabazimbi water forum (farmers, mines, and other industries) and the "One Catchment Same Water" forum. The site reports that the Department of Water and Sanitation arranges meetings and facilitates discussions with stakeholders to go over water users' rights concerns. The System Operating Forum, which, due to COVID-19, hasn't held meetings recently, gets together to discuss the reconciliation strategy. The forum, which the site belongs to, looks at water use from a system context over a 30-year timeline. The forum also looks at hydrology to ensure the catchment is in a good state and identifies shortcomings in the catchment's health and identifies possible interventions. It is anticipated by the site that this information will become a part of individual licenses as necessary, so action becomes compulsory. The size of the intervention will dictate the level of regulatory involvement and enforcement required.



Requirement #	Requirement Text	Rating	Basis for rating
4.2.1.2.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices.		The Ground Water Liability Project was commissioned in 2018 to simulate future high-level scenarios to mitigate the possible impacts of the post closure water quality and groundwater contamination plumes. There was an update to this in 2019 in the Amandelbult Section Integrated Water & Waste Management Plan Update. The integrated water management model for the Amandelbult mine site in 2015. The site-wide water balance model of 2020 evaluates various water management options and informs a water management strategy. Other studies supplement this in-depth information. Various stakeholder engagements have taken place, but the evidence provided does not demonstrate the involvement of a wider community spectrum.
4.2.1.3.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels and shall take steps to contribute positively to local and regional water stewardship outcomes.		The integrated water management plan is informed by various internal and external studies, for example, the Amandelbult Ground Water Liability Project Post Closure Mitigation Scenario, the Thabazimbi Water Distribution Infrastructure Masterplan, and the Water Demand Management and Water Conservation for Thabazimbi & Regorogile 2019. Minutes from Thabazimib Catchment Management Forum meeting and Magalies Water meeting show examples of discussion over water challenges and opportunities at the local and regional levels.
4.2.2.1.	The operating company shall gather baseline or background data to reliably determine: A. The seasonal and temporal variability in: i. The physical, chemical, and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project. ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs, and groundwater) that may be affected by the mining project; and B. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project.		The scope of the 'Amandelbult Water Balance 2018.pdf' AD16, is for the mine activities. The water management plan shows monitoring for surface waters upstream of the site to December 2020. The groundwater and surface water monitoring report for Tumela Mine is dated 2015. More up-to-date information was not available during the on-site assessment.

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4.2.2.2.	<p>The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:</p> <ul style="list-style-type: none"> <li>A. The mining-related chemicals, wastes, facilities, and activities that may pose a risk to water quality; and</li> <li>B. The mine's use of water, and any mining activities that may affect water quantity.</li> </ul>	✔	<p>Baseline water quality data is presented in the groundwater models Baseline Water Balance Report for Amandelbult Mine and the Groundwater and Surface Water Monitoring Report. The Environmental Management Plan contains relevant information, including consultation with stakeholders. The site has met with leaders of each community in community engagement and water user forums, including the Thabazimbi water forum (farmers, mines, and other industries) and the One Catchment Same Water forum. The site reports that the Department of Water and Sanitation arranges meetings and facilitates discussions with stakeholders to go over water users' rights concerns. The System Operating Forum, which due to COVID-19 hasn't held meetings recently, gets together to discuss the reconciliation strategy.</p>
4.2.2.3.	<p>Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:</p> <ul style="list-style-type: none"> <li>A. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources.</li> <li>B. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels);</li> <li>C. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and</li> <li>D. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure.</li> </ul>	⊕	<p>Site water balance has been developed using the GoldSim Model and hydrogeological models are in place and updated annually and include reporting on simulated groundwater inflows. Work is in progress to provide more accurate and real-time data to the hydrogeological model via the installation of scavenger wells (particularly around the Tailing Storage Facility where a pollution plume is identified). The 'Amandelbult Water Balance' Report shows an average over the 2018 period, rather than high and low flow data. There is an integrated water management model for the Amandelbult mine site, developed in 2015, that defines measures for potential mitigation against potential impacts on water quality during operations and an emergency plan that does the same for the Tailing Storage Facility's failure and worst-case scenarios. Overview for potential mine closure scenarios was also reviewed. The culmination of various studies forms a detailed platform for conceptual site modeling with a tailing storage facilities focus. Inclusion of groundwater and surface water sources is being further extended to capture clean water storage, starting in 2022. Seventeen scavenger wells are discussed, and some were observed during the site tour.</p>




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4.2.2.4.	Use of predictive tools and models shall be consistent with current industry best practices and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected.	✔	Site water balance has been developed using GoldSim Model and hydrogeological models are in place and updated annually (latest 2020) that report on simulated groundwater inflows. Scope and costs for updating models to conduct post-closure mitigation scenarios were provided. The Anglo American Water Management Standard requires each operation to have a hydrological model that demonstrates an understanding of climate and hydrological data that meets the requirements of the Surface Flooding Risk Management Plan Development and Implementation Specification (AT TS 602 104). The Investment Criteria by Stage document sets out a streamlined decision-making approach that aligns with industry best practice including the need for modelling at main project stages.
4.2.3.1.	The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.	◐	The mine has met with leaders of each community in community engagement and water user forums, including the Thabazimbi water forum (farmers, mines, and other industries) and the One Catchment Same Water Forum. The mine reports that the Department of Water and Sanitation arranges meetings and facilitates discussions with stakeholders to go over water users' rights concerns. The System Operating Forum, which due to COVID-19 hasn't held meetings recently, gets together to discuss the reconciliation strategy.
4.2.3.2.	<p>If a surface water or groundwater mixing zone is proposed as a mitigation strategy:</p> <p>A. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies, and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and</p> <p>B. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum:</p>	✘	<p>Amandelbult is authorized to discharge groundwater from underground workings to the Crocodile and Bierspruit river. The discharge quality is monitored monthly against Water Use License limits by an external accredited laboratory (Aquatigo) and reported to the Department of Water and Sanitation monthly. Results presented to stakeholders show ongoing exceedances to water quality limits. At the time of the onsite assessment, the site was engaging with the regulator in order to have the water quality limits amended.</p> <p>The biannual Biomonitoring survey report is an assessment of the receiving aquatic systems of Crocodile River and the Bierspruit River to identify possible spatial water quality related declines and recommendation on dilution monitoring according to parameter concentrations.</p> <p>The site has implemented a surface water mixing zone as a mitigation strategy using the receiving wetland area prior to eventual discharge to the Crocodile River.</p> <p>No information with respect to a completed risk assessment related to this mixing zone was available during this assessment. It was also reported that a</p>

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	<ul style="list-style-type: none"> <li>i. Surface water or groundwater mixing zones are as small as practicable.</li> <li>ii. Water in a surface water mixing zone is not lethal to aquatic life.</li> <li>iii. A surface water mixing zone does not interfere with the passage of migratory fish.</li> <li>iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and</li> <li>v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable.</li> </ul>		<p>neighboring farmer is capturing and land-applying the mine water discharge downstream from the wetland mixing zone.</p>
4.2.3.3.	<p>Water affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:</p> <ul style="list-style-type: none"> <li>A. Being maintained at baseline or background levels; or</li> <li>B. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to end uses).</li> </ul>		<p>Permitted water uses for the mine are set out in licenses 03/A24F and 07/A24C. Additional Water Use Licenses have been put in place more recently to accommodate the open cast activities. The discharge quality is monitored monthly against Water Use License limits by an external accredited laboratory (Aquatico) and reported to the Department of Water and Sanitation monthly. Monthly monitoring data against Water Use License limits were viewed.</p> <p>Various stakeholder engagement activities have taken place, but the evidence provided does not demonstrate that this is across the wider water-use community spectrum. No concerns or water-related needs are identified.</p> <p>The Groundwater and Surface water monitoring procedures are dated 2015; it is understood that these were amended in 2019/2020, but approval for the revised procedures must be via the Standards Committee and this has not yet taken place. Reviewed approved procedures at the time of the site visit and changes are being applied in practice.</p>

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4.2.3.4.	Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2).	✔	Water Use Licenses, subject to an annual external compliance audit, include a groundwater extraction limit and state the need for rational use and water recycling with monitoring and reporting requirements. The Water Management Plan focuses on freshwater use reduction, water conservation through water demand management, water metering and data collection, stormwater and surface flooding risk management, and community / stakeholder water requirements. Based on available evidence, mining has not adversely affected the quantity of water needed to maintain pre-mining activities or potential future uses identified by stakeholders.
4.2.4.1.	<p><b>Critical (a through e)</b> The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:</p> <ul style="list-style-type: none"> <li>A. Establish enough monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics).</li> <li>B. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics.</li> <li>C. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics.</li> <li>D. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities.</li> <li>E. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and</li> <li>F. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables.</li> </ul>	✘	Groundwater and surface water quality is monitored monthly against the water license limits. The Water Management Plan focuses on water quality management, water metering and data collection. This is supported by the Groundwater and Surface water monitoring procedure, and newly developed Trigger Action Response Plans that incorporate the IRMA water quality guidelines. Accreditation certificates for Aquatico lab were reviewed during the on-site assessment, along with additional Aquatico water license compliance monitoring results. Review of the water quality monitoring reports identified that the site continues to experience exceedances in the water quality limits established in the Water Use License. The site is currently pursuing an amendment to the license, including modification of the limits based on typically used factors of the surrounding area.

Requirement #	Requirement Text	Rating	Basis for rating
4.2.4.2.	<p>Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis.</p>	⊗	<p>Groundwater and surface water quality are monitored monthly against Water Use License limits. During the time of the on-site assessment, the site was in the process of finalizing and approving the Anglo American Platinum Amandelbult Monitoring Procedures and Adaptive Management Plan. This new plan includes detailed Trigger Response Action Plans that incorporate both regulatory Water Use License limits and the IRMA Water Quality Criteria. The site intends to incorporate the IRMA Water Quality Criteria into its accredited lab analysis scope of work on regular water quality monitoring reports. The site has begun a review and renewal process for the Water Use License with the regulatory body with an objective of updating water quality limits to reflect more accurately actual and likely uses of the water resource the site discharges into.</p>
4.2.4.3.	<p>The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:</p> <ul style="list-style-type: none"> <li>A. Participation may involve the use of independent experts selected by the community; and</li> <li>B. If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed.</li> </ul>	⊙	<p>Meeting records show examples of discussions over water challenges and opportunities at the local and regional levels. The Environmental Impact Assessment phase completed by the site identifies stakeholders, and the stakeholder engagement team then initiates contact. Two municipalities, three traditional communities and one Communal Property Association, each with a varying number of villages have been identified. The site has met with leaders of each community in community engagement and water user forums including the Thabazimbi water forum (farmers, mines, and other industries) and the One Catchment Same Water forum. The site reports that the DWS arranges meetings and facilitates discussions with stakeholders to go over water users' rights concerns. When not impacted by COVID-19, the System Operating Forum gets together to discuss the reconciliation strategy. The forum, which the site belongs to, looks at water use from a system context over a 30-year timeline. Actions that will be developed by the forum are intended to be binding on all water users in the catchment.</p>
4.2.4.4.	<p><b>Critical</b> The operating company shall develop and implement an adaptive management plan for water that:</p> <ul style="list-style-type: none"> <li>A. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and</li> </ul>	◐	<p>The Emergency Response and Preparedness document includes Trigger Action Response Plans for critical controls that apply to water levels and pressure only. During the on-site assessment the site was in the process of approving new Trigger Action Response Plans that incorporate the IRMA water quality guidelines and the water use license limits. The culmination of various studies forms a detailed platform for conceptual site modeling with a Tailing Storage Facility focus, and inclusion of groundwater and surface water sources. This is being further extended to capture clean water storage from 2022. The regular water monitoring regime is set up for reporting to the regulatory</p>

Requirement #	Requirement Text	Rating	Basis for rating
	B. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.		authority for exceedances. Water modeling provides information to predict scenarios for which mitigation may be planned, then captured in water management plan(s) and the Integrated Water and Waste Management Plan(s) (IWWMP). Information from the water balance supports guidance on where to discharge during seasons, factoring in seasonal rainfall. At the time of the on-site assessment the site did not yet have a formal adaptive management plan in place, but rather a corporate approach supported by the newly established Trigger Action Response Plans.
4.2.4.5.	Annually or more frequently, if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes.	✘	During the time of the on-site assessment the site was in the process of finalizing and approving the Anglo American Platinum Amandelbult Monitoring Procedures & Adaptive Management Plan. This new plan includes detailed Trigger Response Action Plans that incorporate both regulatory Water Use License limits and the IRMA Water Quality Criteria. The site intends to incorporate the IRMA Water Quality Criteria into its accredited lab analysis scope of work on regular water quality monitoring reports.
4.2.4.6.	Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans.	✘	During the time of the on-site assessment the site was in the process of finalizing and approving the Anglo American Platinum Amandelbult Monitoring Procedures & Adaptive Management Plan. This new plan includes detailed Trigger Response Action Plans that incorporate both regulatory limits and the IRMA Water Quality Criteria. The site intends to incorporate the IRMA Water Quality Criteria into its accredited lab analysis scope of work on regular water quality monitoring reports. No evidence was presented to show that the site has engaged stakeholders for feedback with respect to the newly updated Monitoring Procedures & Adaptive Management Plan.
4.2.5.1.	The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities: A. Monitoring data for surface water and groundwater points of compliance; and B. Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps, and groundwater), and the volume of water	⊕	Correspondence with the Department of Water and Sanitation (DWS) shows that monthly quality reports are sent to the DWS. The site conducted an Environmental Management Accountability Forum early in 2022 and included presentation and discussion of water quantity and quality performance results. The presentation and discussion also included descriptions and locations of water quality monitoring points, and "Plans for Water Quality Exceedances". However, no specifics of the plans were provided, including timelines, responsibilities, and anticipated outcomes.

Requirement #	Requirement Text	Rating	Basis for rating
	discharged and extracted/pumped for mining operations.		
4.2.5.2.	The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders if there are changes in water quantity or quality that pose an imminent threat to human health or safety, or commercial or natural resources.		<p>The emergency preparedness documents and plans include Trigger Action Response Plans to safeguard the safety of employees and the community in the event of flooding or Tailing Storage Facilities failure. This also includes an element of stakeholder communication, as seen in an example of an 'Emergency Preparedness/Community Engagement' memo. The newly developed Trigger Action Response Plans in Table 31 of the Monitoring Procedures &amp; Adaptive Management Plan include trigger-level requirements for communicating changes in water quality that pose an imminent threat to stakeholders.</p> <p>At the time of the assessment, these had just been formally approved by the site. Further review of the effective implementation of these procedures will take place during the surveillance and recertification assessments.</p>
4.2.5.3.	The operating company shall discuss water management strategies, performance, and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders.		<p>The Water Management Guidelines describe the process for stakeholder engagement and consultation that sets out a wide scope in relation to water management and engagement objectives. Examples of actual engagement were reviewed during the site visit and stakeholder consultation portion of the audit. Most recent evidence of stakeholder consultation with respect to water resources includes the Environmental Management Accountability Forum held in early 2022. However, the newly updated Monitoring Procedures &amp; Adaptive Management Plan had not yet been completed.</p>
<b>Chapter 4.3—Air Quality</b>			
4.3.1.1.	The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations.		<p>The Air Quality Management Plan refers to dust fallout monitoring and evidence of dust fallout reports were made available for review. Monitoring reports were viewed from the continuous monitoring system at the open cast sites and (for dust at other areas of the site) from Skyside.</p> <p>The Environmental Management Plan requires quarterly monitoring for CO, SO<sub>2</sub>, and NO<sub>2</sub> but the site is monitoring monthly for more parameters.</p>



Requirement #	Requirement Text	Rating	Basis for rating
4.3.1.2.	During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area.	✓	Baseline ambient air quality data was identified in the Environmental Management Plan of 1995, 2006 and 2013. Reportedly, there hasn't been a significant increase in ambient dust levels. Site will ensure actions are implemented in accordance with target dates for all action plans.
4.3.1.3.	If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts.	●	No limits for any of the parameters were exceeded. Quarterly Health Safety and Environment reports do not identify any issues with dust quality or non-compliance with the National Dust Control Regulations. The Air Quality Management Plan is dated 2018 and has not considered the re-vegetation of the Tailing Storage Facility.
4.3.1.4.	The assessment shall include the use of air quality modeling and monitoring consistent with widely accepted and documented methodologies to estimate the concentrations, transport, and dispersion of mining-related air contaminants.	✓	The Ambient Air Quality Study conducted by Aurecon consists of dispersion modelling undertaken.
4.3.2.1.	<b>Critical</b> If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measure to avoid, and where that is not possible, minimize adverse impacts on air quality.	●	The Air Quality Management Plan is implemented, and sampling and continuous monitoring generate data for review that has not identified significant impacts during normal operations and blasting. Evidence of blasting reports that measure noise, dust (Pm10 and 2.5), carbon monoxide, hydrogen sulfide, sulfur dioxide, nitrous oxide and nitrogen dioxide was provided for review. The floating dust of PM2.5 was below the specified limit of 40µg/m3, and the floating dust of PM10 was below the specified limit of 75 µg/m3. Management plans and root cause investigation have not been developed and implemented for instances where non-compliances have taken place.
4.3.2.2.	Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life.	✓	The Air Quality Management Plan is being followed and additional parameters and reporting frequency have been implemented by the site. This has included the recent (2020) installation of a continuous monitoring system (CMS) on the east (open cast) and west sides of the site with plans to extend this through the central site, also providing real time data (CO, NO2, SO2, H2S, dust/PMs).

Requirement #	Requirement Text	Rating	Basis for rating
			It is understood that existing Environmental Management Programs and Environmental Impact Assessments will be revised to take into consideration proposed new expansion projects and some of the existing management plans will be updated.
4.3.3.1.	The operating company shall monitor, and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring.	●	<p>Air quality personnel (external Consultants) are subject matter experts in the field of air quality management. Whilst the site shared copies of the Air Quality Management Plan and the air quality standard, no further evidence was shared that Anglo American Amandelbult has verified the competency of the personnel trained in Air Quality management.</p> <p>Competency was checked for the person responsible for this including technical qualifications. This is the current resource from an external company, but others would be made available by SkySide who do additional monitoring to the continuous system. The contractor does monthly sampling according to its own monitoring plan.</p> <p>Results were reviewed for dust monitoring (well below the limit) and NO2 during blasting. NO2, CO, H2S, SO2, pm10 and pm2.5 are continuously monitored at the open cast facilities and are detected by the environmental team when it happens via an alert.</p>
4.3.3.2.	Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3 and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results.	⊕	<p>Modelling was taken as part of the Environmental Impact Assessment / Environmental Management Plan phase of the mine and dust bucket localities and air quality monitoring stations have been established based on the surrounding receptors. Location of monitoring points with receptors in practice, including hours of operation/ blasting events were verified during the on-site assessment.</p> <p>The dust fallout reports (compiled by SkySide) do not contain any South African Weather Services reporting information such as predominant wind direction and meteorological data. This info is required by the National Dust Control Regulations.</p>
4.3.4.1.	New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and	—	Per guidance from IRMA, this requirement does not need to be scored during the launch phase; however, auditors are encouraged to provide information on the site's performance and practices to support ongoing development of the standard.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>transportation routes, and/or mitigate exceedances as follows:</p> <p>A. If a mine is in an air shed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or</p> <p>B. If a mine is in an air shed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards and make incremental improvements to the air quality in the air shed that are at least equivalent to the mining project's emissions.</p>		<p>The organization complies to The National Environment Management: Air Quality Act (NEM: AQA), No. 39 of 2004 that governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. All exceedances are investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3-1). The relevant authorities should be informed if the permitted fallout rates and frequencies are exceeded. The monitoring is conducted in alignment with ASTM D1739. The site is currently complying with South African and ASTM standards but has not yet reviewed the EU standard and compared performance. The site is not aware of the details of EU regulations and has not undertaken any assessment to confirm if compliance to the EU regulations is in place.</p>
4.3.4.2.	<p>As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:</p> <p>A. New and existing mines shall comply with the host country's air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard.</p> <p>B. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply.</p> <p>C. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and</p>	—	<p>Per guidance from IRMA, this requirement does not need to be scored during the launch phase; however, auditors are encouraged to provide information on the site's performance and practices to support ongoing development of the standard.</p> <p>The site complies with local regulation and ASTM standards but has not taken a risk-based approach to determining what air quality standards are applied. Based on available evidence, the mine meets requirement a. only.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	D. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines.		
4.3.4.3.	Dust deposition from mining-related activities shall not exceed 350 mg/m <sup>2</sup> /day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination.	—	<p>Per guidance from IRMA, this requirement does not need to be scored during the launch phase; however, auditors are encouraged to provide information on the site's performance and practices to support ongoing development of the standard.</p> <p>The National Environment Management: Air Quality Act, No. 39 of 2004 (NEM: AQA) governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. All exceedances are investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3-1).</p> <p>Regulatory limits noted in referenced table are:  30-day average:  Residential D &lt; 600  Non-residential &lt; 1200</p>
4.3.5.1.	The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available or made available to stakeholders upon request.	☑	The Air Quality Management Plan is not publicly available, and no such request has been made to date. However, mechanisms are in place should these requests be made to the operating mine.
<b>Chapter 4.4—Noise and Vibration</b>			
4.4.1.1.	The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project's noise and/or vibration. Screening is required at all new mines, and at existing mines if there is a proposed change to the mine plan that is likely to	☑	<p>The mine carried out screening when the mine proposed a change to the mine plan that was likely to result in a new source of noise or vibration or an increase in noise or vibration levels.</p> <p>Surface noise continuous monitoring was installed for Harkdoring Drift and other locations around the mine in September 2021 because of receptors</p>

Requirement #	Requirement Text	Rating	Basis for rating
	result in a new source of noise or vibration or an increase in existing noise or vibration levels.		identified through impact assessment. Real-time compliance was verified using the online monitoring system and no non-compliances were observed.
4.4.1.2.	If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors.	✔	All new mining areas have a baseline noise assessment at nearest receptors. Baseline studies exist for Harkdoring Drift, Middellaagte and Moddergat, plus underground operations (Tumela).
4.4.2.1.	If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00 (i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are necessary and/or appropriate because of local, cultural or social norms.	✔	<p>For new shaft development, all noise receptors were modelled from noise measurements taken for baseline and found to comply with the 55dB(A) for daytime and 45dB(A) for nighttime.</p> <p>Surface noise continuous monitoring was installed for Harkdoring Drift and other locations around the mine in September 2021 because of receptors identified through impact assessment.</p> <p>An environmental noise survey was undertaken in November 2021 to assess the existing control measures and their effectiveness. Recommend control measures, if necessary to determine if further evaluation and investigation are necessary.</p> <p>The emphasis of the noise assessment was on the noise outside the perimeter and the interpretation was therefore of noise levels exceeding the statutory limits (SANS 10103:2008 Ed 6 and SANS 10328:2008 Ed 3) outside the perimeter during daytime and nighttime.</p> <p>The noise sources measured which are not within standard, are not generated from the Amandelbult mine, but from natural ambient and traffic sources. There is no impact noise from the mine at the areas that were measured. No results have been consolidated to date to demonstrate real-time compliance.</p>
4.4.2.2.	<p>The following exceptions to 4.4.2.1 apply:</p> <p>A. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or</p>	●	<p>All noise receptors were modelled from noise measurements taken for baseline and found to comply to the 55dB(A) for daytime and 45dB(A) for nighttime, except, according to one study, at the sensitive receptors associated with the No. 1 Shaft at night due to the mining operations.</p> <p>Air blast overpressure and ground vibration are being measured however the baseline did not include study of noise receptors affected by blasting operations.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	B. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met.		The original 2016 assessment report did identify and consider impact on receptors and no significant change to site or operations has taken place since operations began in 2016. Initial monitoring and modelling of noise and vibration is being piloted and to date shows that receptors are not being affected by operations or by planned blasting (accounting for time of day, ambient conditions, etc.).
4.4.2.3.	If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary, or nearest industrial or commercial receptor shall not exceed 70 dBA.	—	Not relevant; no sensitive noise receptors were identified.
4.4.2.4.	If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows: A. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period. B. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and C. Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time.	●	Air blast overpressure and ground vibration is being measured. An original Environmental Assessment in 2016 identified potential noise/vibration receptors that could be affected by blasting operations. The pit is blasted before sundown as per legal requirement and this can be after 17:00. This is done to ensure that the underground mine (Tumela) is cleared of personnel as soon as the shift ends at 17:00. This justification for blasting after 17:00 is not set out clearly in accompanying documents/procedures. The planned noise modelling will over time account for the potential impact or otherwise on receptors from blasting operations taking place after 17:00. No blasting takes place before sun-up (as per legal allowance) due to operational constraints and moisture.
4.4.2.5.	Mines may undertake blasting outside of the time restraints in 4.4.2.4.b when the operating company can demonstrate one or more of the following: A. There are no nearby human noise receptors that will be impacted by blasting noise or vibration.	⊕	Blasting does occur outside of time restraints identified in 4.4.2.4.b. - see above. Modeling for the impacts (e.g., noise and vibration) that blasting will have on surrounding receptors, especially after 17:00 has not been undertaken yet.




Requirement #	Requirement Text	Rating	Basis for rating
	<p>B. Alternative hours are necessary and/or appropriate because of local, cultural, or social norms; and/or</p> <p>C. Potentially affected human receptors have given voluntary approval for the expanded blasting hours.</p>		
4.4.2.6.	<p>If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the operating company shall consult with affected stakeholders to develop mitigation strategies or other proposed actions to resolve the complaint. Where complaints are not resolved then other options, including noise monitoring and the implementation of additional mitigation measures, shall be considered.</p>	⊕	<p>The company has a process for receiving and acting upon complaints. The mine has not received any noise or blasting-related complaints to date, although other complaints have been received. All complaints are managed through the social performance teams for further investigation. There is no mechanism in place to confirm which complaints are investigated.</p>
4.4.2.7.	<p>All noise- and vibration-related complaints and their outcomes shall be documented.</p>	⊙	<p>Evidence provided shows that complaints and their outcomes are documented. There were no examples of noise complaints in the evidence submitted but the system was clearly demonstrated.</p> <p>All complaints are managed through the social performance teams for further investigation.</p>
4.4.3.1.	<p>When stakeholders make a noise-related complaint, the operating company shall provide relevant noise data and information to them. Otherwise, noise data and information shall be made available to stakeholders upon request.</p>	—	<p>The incident / grievance or complaint procedure is communicated monthly to communities through the Amandelbult Times newspaper. It is also communicated on a day-to-day interface with communities who visit the operation to inquire and in the scheduled meetings as per the Stakeholder Engagement Plan.</p> <p>The mine has not received any noise or blasting-related complaints to date</p>

Chapter 4.5—Greenhouse Gas Emissions


Requirement #	Requirement Text	Rating	Basis for rating
4.5.1.1.	<p><b>Critical</b> The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:</p> <ul style="list-style-type: none"> <li>A. Identifying and measuring greenhouse gas emissions from the mining project.</li> <li>B. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project.</li> <li>C. Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and</li> <li>D. Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions.</li> </ul>	✔	<p>Anglo American has committed to becoming carbon neutral across its operations by 2040. Operational emissions reductions are to be achieved through renewable electricity, low carbon power sources, methane capture and energy efficiency. The Group Climate Change Policy includes a commitment to measuring and reporting on group-wide direct, indirect, and product-related emissions and regularly updating the board, investors, host governments and other relevant stakeholders on their progress in reducing carbon emissions and energy consumption.</p>
4.5.2.1.	<p>The operating company shall comply with emissions quantification methods described in a widely accepted reporting standard, such as the Greenhouse Gas Protocol Corporate Standard or the Global Reporting Initiative's GRI 305 emissions reporting standard.</p>	⊕	<p>The Standard for Energy and Greenhouse Gas Emissions Management applies to all Anglo American managed businesses and operations and is applied at Amandelbult. The standard requires that energy and greenhouse gas (GHG) emission savings reported must comply with Anglo American reporting requirements, and the calculation templates for the mine have been set up in accordance with requirements set out in the document. The group standard does not refer to specific recognized greenhouse gas standards, emissions factors, or other relevant GHG protocols, and while it sets out a rational and systemic approach to GHG and energy accounting and reporting, it is not known if it has been developed in line with a widely accepted reporting standard. The group Climate Change Report does not make a direct reference to standards used in its accounting.</p>
4.5.3.1.	<p>The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy.</p>	✔	<p>Project lists were reviewed with the site and include identified energy-reduction projects that roll up and align with the corporate GHG reduction strategy and Climate Change Policy. The Amandelbult Energy Mapping shows the roadmap sets out the long-term incentive plan (LTIL) targets and an intensity roadmap with a project pipeline starting in 2022 to reach overall 2030 and beyond reduction targets set at the group level and adopted by the site.</p>




Requirement #	Requirement Text	Rating	Basis for rating
			Not all projects are yet approved but are expected to be implemented in 2022. The Clean Power for Mines projects introduce renewables initiatives and will begin in 2024.
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.	✓	The Amandelbult Energy Mapping shows the roadmap sets out the LTIP targets and an intensity roadmap with a project pipeline starting in 2022 to reach overall 2030 and beyond reduction targets set at group level and adopted by the site. Not all projects are yet approved but are expected to be implemented in 2022. The Clean Power for Mines projects introduce renewables initiatives and will begin later in 2024. The Amandelbult Sustainable Mining Plan 2021 is a part of the Amandelbult Sustainability Chapter of the Life of Asset Plan and is the 5-year Sustainability Plan as required by the Anglo American Sustainable Mining Plan Critical Task. This plan is integrated with Life of Asset Plan 2021, site, Business Unit and Group level plans and budgets and is updated annually, providing a list of actions, accountabilities, timing, and high-level summary of budget requirements for the Sustainable Mining Plan stretch goals. The current red, amber, green (RAG) status for climate change status is marked red but is expected to reduce to amber or green as the roadmap gets underway.
4.5.3.3.	The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies, and shall document the results of its investigations.	✓	The Solar PV Proposal & Plan is a cost-effective proposal for solar initiatives and is an example among others that the site is investigating a wide financial and performance range of projects aimed and reducing Greenhouse Gas emissions. The site's list of projects includes a prioritization based on feasibility and anticipated GHG reduction per project costing.
4.5.4.1.	The greenhouse gas policy shall be publicly available.	✓	Anglo American Amandelbult has adopted the corporate Group Climate Change Policy which applies to all Anglo American Platinum business units, group functions and controlled subsidiaries. This policy is available on the group website and is well communicated across the Anglo American group.
4.5.4.2.	On an annual basis, the operating company or its corporate owner shall: A. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards	✓	During the site visit, project GHG emissions, progress towards mine-site-level reduction targets, and emissions reduction initiatives were reviewed. The Operations Committee Report is updated monthly and includes performance against energy and carbon intensity targets on a site basis.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>mine-site-level greenhouse gas reduction targets; and efforts taken to reduce emissions from the mining project and mining-related activities; and</p> <p>B. Publicly report on mine-site-level or corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions.</p>		
<b>Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas</b>			
4.6.1.1.	<p>Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies.</p>		<p>A baseline biodiversity assessment was undertaken by an external biodiversity specialist. The aim of the assessment was to assist in the rollout of the Anglo American Biodiversity Standard across identified operations.</p> <p>Implementation of mitigation measures from the biodiversity assessment conducted in December 2021 was undertaken in phases and full implementation of mitigation measures could not be verified. Further assessment and verification to be done during surveillance.</p>
4.6.1.2.	<p>Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts.</p>		<p>Stakeholders were consulted about relevant priority ecosystem services that are significant to them and their communities and cultures. However, the implementation of mitigation measures related to observations from the biodiversity assessment conducted in December 2021 could not be verified.</p>
4.6.1.3.	<p>Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request.</p>		<p>Biodiversity screening is included as part of the environmental impact assessment that stakeholders are given an opportunity to review (as part of the environmental impact assessment (before the mine began operations).</p> <p>The site's updated Safety, Health and Environmental Policy outlines the approach that would be followed should stakeholders request any "environmental related information".</p> <p>No such requests have been made to date.</p>

Requirement #	Requirement Text	Rating	Basis for rating
4.6.2.1.	<p><b>Critical New</b> and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities.</p>	✔	<p>Amandelbult appointed Scientific Aquatic Services to undertake the biodiversity assessment.</p> <p>The Scope of work included:</p> <ul style="list-style-type: none"> <li>- Define biodiversity of the Surface Right Area</li> <li>- Define and map the present ecological state, significant biodiversity features and priority ecosystems services</li> <li>- Identify species of conservation concern which can be considered significant biodiversity features and identify suitable habitat for such species</li> <li>- Identify (high-level) management actions to conserve current biodiversity</li> <li>- Identify actions to consider during potential future development</li> </ul>
4.6.2.2.	<p>Screening shall include identification and documentation of:</p> <ol style="list-style-type: none"> <li>A. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas.</li> <li>B. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values.</li> <li>C. Areas of modified habitat, natural habitat, and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened, and endangered species) present in the critical habitat areas; and</li> <li>D. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services.</li> </ol>	✔	<p>A baseline biodiversity assessment was undertaken by an external biodiversity specialist in December 2021 included Flora and Fauna assessments, Priority Ecosystem Services. High Biodiversity Importance and legally protected areas identified in the February 2021 biodiversity annual monitoring report.</p> <p>The following biodiversity considerations were proposed by Scientific Aquatic Services:</p> <ul style="list-style-type: none"> <li>- No mining or prospecting is allowed in the Madeleine Robinson Nature Reserve, as it is legally protected.</li> <li>- Consider rehabilitation of areas adjacent to Madeleine Robinson Nature Reserve on mine property and to the west to expand biodiversity protection area.</li> <li>- Moderately High and Highly sensitive habitat units should be excluded from future mining.</li> <li>- Permits for all protected Species of Conservation Concern should be obtained from authorities prior to disturbance.</li> <li>- Rehabilitation of degraded and low sensitivity areas could be viewed as a potential trade-off where unavoidable impacts occur in areas of increased sensitivity.</li> </ul>

Requirement #	Requirement Text	Rating	Basis for rating
4.6.3.1.	<p>When screening identifies protected areas or areas of potentially important global, national, or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:</p> <ul style="list-style-type: none"> <li>A. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence.</li> <li>B. Identification of potentially significant direct, indirect, and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle.</li> <li>C. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and</li> <li>D. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services.</li> </ul>		<p>A baseline biodiversity assessment was undertaken by an external biodiversity specialist in December 2021, which included Flora and Fauna assessments and a priority Ecosystem Services Assessment.</p> <p>The site has not yet completed action plans and further evaluation of options to avoid impact on biodiversity.</p>
4.6.4.1.	<p><b>Critical Mitigation</b> measures for new mines shall:</p> <ul style="list-style-type: none"> <li>A. Follow the mitigation hierarchy of:</li> </ul>	—	Amandelbult is an existing mine.

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;</li> <li>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;</li> <li>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and</li> <li>iv. As a last resort, offsetting the residual impacts.</li> </ul> <p>B. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process;</p> <p>C. Be designed and implemented to deliver at least no net loss, and preferably a net gain in important biodiversity values, and the ecological processes that support those values, on an appropriate geographic scale and in a manner that will be self-sustaining after mine closure.</p>		
4.6.4.2.	<p>At existing mines:</p> <p>A. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement on-site restoration strategies, and, through consultation with stakeholders, design and implement additional conservation actions to support the enhancement of important biodiversity values and/or priority ecosystem services on an appropriate geographic scale; and</p> <p>B. If there is the potential for new impacts on important biodiversity values or priority ecosystem services (e.g., because of mine expansions, etc.), the operating company shall</p>		This site is still in the process of evaluating offsets as a part of the updated biodiversity assessment.

Requirement #	Requirement Text	Rating	Basis for rating
	follow the mitigation hierarchy, prioritizing the avoidance of impacts on important biodiversity values or priority ecosystem services, but where residual impacts remain, shall apply offsets commensurate to the scale of the additional (new) impacts.		
4.6.4.3.	Offsetting, if required, shall be done in a manner that aligns with international best practice.	⊕	An environmental impact assessment (in line with the South African legislation) at the time didn't identify a need for biodiversity offsets. As part of a recent biodiversity update, offsets will be established for ease of tracking.
4.6.4.4.	<p>The operating company shall develop and implement a biodiversity management plan or equivalent that:</p> <ul style="list-style-type: none"> <li>A. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations, and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services.</li> <li>B. Identifies key indicators and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time.</li> <li>C. Provides a budget and financing plan to ensure that funding is available for effective mitigation.</li> </ul>	⊕	A baseline Biodiversity Assessment was undertaken and following finalization, management plans will be established for tracking and progress.
4.6.4.5.	Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle.	⊕	A baseline Biodiversity Assessment was undertaken and following finalization, management plans will be established for tracking and progress.
4.6.5.1.	An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the	—	No new mines are being established in legally protected areas.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>remainder of this chapter are met, and additionally the company:</p> <ul style="list-style-type: none"> <li>A. Demonstrates that the proposed development in such areas is legally permitted.</li> <li>B. Consults with protected area sponsors, managers, and relevant stakeholders on the proposed project.</li> <li>C. Conducts mining-related activities in a manner consistent with protected.</li> <li>D. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area.</li> </ul>		
4.6.5.2.	<p>An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized.</p> <ul style="list-style-type: none"> <li>• International Union for Conservation of Nature (IUCN) protected area management category IV protected areas;</li> <li>• Ramsar sites that are not IUCN protected area management categories I-III; and</li> <li>• Buffer zones of UNESCO biosphere reserves.</li> </ul>	—	No protected areas were identified within Amandelbult surface right area.
4.6.5.3.	<p><b>Critical IRMA</b> will not certify new mines that are developed in or that adversely affect the following protected areas:</p> <ul style="list-style-type: none"> <li>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;</li> <li>• IUCN protected area management categories I-III;</li> <li>• Core areas of UNESCO biosphere reserves.</li> </ul>	—	No protected areas were identified within Amandelbult surface right area.

Requirement #	Requirement Text	Rating	Basis for rating
4.6.5.4.	<p><b>Critical An</b> existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:</p> <ul style="list-style-type: none"> <li>A. The mine was developed prior to the area's official designation;</li> <li>B. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized; and</li> <li>C. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan.</li> </ul>	—	No protected areas were identified within Amandelbult surface right area.
4.6.6.1.	The operating company shall develop and implement a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine lifecycle.	—	No protected areas were identified within Amandelbult surface right area.
4.6.6.2.	Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time.	⊕	Annual monitoring of flora and fauna is undertaken by an independent ecologist. In December 2021, flora and fauna assessment were undertaken. Determination of management plans is still in progress.
4.6.6.3.	If monitoring reveals that the operating company's protected areas and/or biodiversity and ecosystem services objectives are not being achieved as expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders.	⊙	Annual monitoring of flora and fauna is undertaken by an independent ecologist. Monitoring reports do not reflect a reduction in ecosystem conditions therefore no corrective actions are required.






Requirement #	Requirement Text	Rating	Basis for rating
4.6.6.4.	The findings of monitoring programs shall be subject to independent review.	⊕	Flora and fauna monitoring is undertaken by Scientific Aquatic Services and aquatic monitoring is undertaken by Clean Stream Environmental, both of which are independent of the mine.
<b>Chapter 4.7—Cyanide Management</b>			
	Chapter Not Relevant		Cyanide is not used, stored, produced, or transported at Amandelbult Mine Complex.
<b>Chapter 4.8—Mercury Management</b>			
	Chapter Not Relevant		Mercury is not used, stored, produced, or transported at Amandelbult Mine Complex.


# Appendix B: Corrective Action Plan



Req. #	Requirement Text		Auditors feedback	Action Plan
Chapter 1.1—Legal Compliance				
1.1.1.1.	The operating company shall comply with all applicable host country laws in relation to the mining project.	●	<p>The SHE way is Anglo American’s Safety, Health and Environmental Management System which are based on the principle of continuous improvement, is consistent with the clauses as outlined in the Occupational Health and Safety Management System (ISO 45001:2018), Environmental Management System (ISO 14001:2015) and strives to comply with all requirements of South African Environmental, Health and Safety legislation. Since the Stage 2 audit, Amandelbult has been developing management plans to assist in assigning the various tasks associated with compliance and management system obligations. The intent of the plans is to cover all aspects of various projects that the mine is intending to undertake, which includes (not limited to) budget, timeline, and personnel and further outlines the steps that the team will use to achieve a shared objective (compliance to the Water Use Licence conditions). Reference documents provided for review: Water Contamination study Action Plan 2023ss (version 1), dated 02 May 2023. Corrective actions were implemented to address the non-conformities identified during the Stage 2 on site assessment. The majority of these corrective actions that were identified by the mine have been completed, but the remaining actions will be implemented in phases due to budgetary constraints. On-site interviews with human resources managers confirmed that overtime requested of employees and contractors may exceed host country and IRMA requirements (3.1.10.1). Interviews with employees and contractors also suggested that some overtime</p>	Amandelbult mine uses the Libryo system and Isometrix for ongoing monitoring of compliance. There is a long term plan to implement actions in the Water Contamination study. Furthermore progress has been made in the implementation of the lifting of overtime procedure and this has addressed the risk of overtime beyond regulatory limits.



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			may not be voluntary if staff shortages exist in each work group (3.1.10.1).	
<b>Chapter 1.2—Community and Stakeholder Engagement</b>				
1.2.2.2.	The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: A. Providing relevant information to stakeholders in a timely manner; B. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; C. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; D. Soliciting feedback from stakeholders on issues relevant to them; and E. Providing stakeholders with feedback on how the company has taken their input into account	●	Although more evidence is required to meet the fully meets rating, it is clear from evidence that engagement is ongoing. However, a consolidated database of engagement undertaken to date is not in the Stakeholder Engagement Plan or readily available.	Stakeholder engagement annual implementation plan is used to update the engagements with stakeholders/communities. Site uses stakeholder engagement register to capture ad hoc engagement and community queries. Ongoing review of stakeholder engagement plan and engagement registers will be undertaken.
<b>Chapter 1.3—Human Rights Due Diligence</b>				
1.3.2.1.	The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically,	●	Evidence provided indicates sustained efforts to identify external risks and potential human rights impacts. The updated baseline Workplace Risk Assessment and Controls provided identifies a range of potential and primarily external human rights impacts and controls. The Significant Risks Monitoring and Measure assessment focuses on potential external risks to the site. A vulnerability assessment was conducted of surrounding	Amandelbult mine will continue to implement actions coming out of the SHIRA analysis, with a focus on strengthening of bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers

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	including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.		communities. A full Social Way 3.0 Social and Human Rights Impact and Risk Analysis is planned. The site has implemented operating company training with respect to bullying, harassment, and victimization. However, interviews with workers and union representatives indicate the potential for human rights risks related to harassment and intimidation of contract workers. Interviewees also mentioned the potential for contract workers to be threatened with termination by their Business Partner employers if they were to indicate an interest in joining a union.	and contractors on right to freedom of association
1.3.3.3	<p>Responding to actual human rights impacts related to the mining project:</p> <p>A. If the operating company determines that it has caused an actual human rights impact, the company shall:</p> <p>i. Cease or change the activity responsible for the impact; and</p> <p>ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders;</p> <p>B. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining</p>		<p>The updated Baseline Workplace Risk Assessment and Control provided identifies a range of potential and primarily external human rights impacts and controls. A full Social Way 3.0 Social and Human Rights Impact and Risk Analysis is planned. The site has mitigated potential human rights impacts through bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers.</p> <p>However, on-site interviews with workers and union representatives indicated the potential for human rights risks related to harassment and intimidation of contract workers. Interviewees also mentioned the potential for contract workers to be threatened with termination by their business partner employer if they chose to join a union (the right to freedom of association).</p>	<p>Amandelbult mine will continue to implement actions coming out of the SHIRA analysis, with a focus on strengthening of bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers and contractors on right to freedom of association</p>

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	<p>impact;            C. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and            D. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.</p>			
<b>Chapter 1.5—Revenue and Payments Transparency</b>				
1.5.1.	<p>The operating company shall develop, document, and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.</p>		<p>Provided documents clearly show the policies and code at the highest level to meet this requirement. Personnel in management positions are all required to take anti-corruption training annually. Evidence shows this has taken place at Amandelbult. Worker and management interviews during the assessment indicated that at least one form of corrupt practice, job and overtime selling, was an ongoing concern. Management was aware of some instances and had initiated investigations and other follow-up actions to address the problem.</p>	<p>Amandelbult has a procedure for investigating fraud and corrupt practices. Several investigations were done according to the procedure and where misconduct was identified action was taken. Monthly security talk topics ongoing to raise awareness on security incidents. Contractor day also includes Fraud and Investigation Unit presentation on anti-corruption measures to raise awareness with Business Partners</p>
<b>Chapter 2.5—Emergency Preparedness and Response</b>				
2.5.2.1.	<p>The emergency response plan shall be developed in consultation with</p>		<p>Plenty of evidence exists for the engagement of workers. Meetings minutes and other documented</p>	<p>An approved EPRP was developed in consultation with affected</p>

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	<p>potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan and include their participation in emergency response planning exercises.</p>		<p>evidence show engagement with local community in emergency preparedness but not necessarily consultation. (i.e., It seems the mine makes decisions and informs the community rather than involving them in the planning process.  Update - Stage 2. Community engagement and stakeholder meetings include some discussion of threats. The site employed an external consultant (Disaster Management Solutions) to help incorporate various external stakeholders in emergency planning.  The mine acknowledged that consultation with communities and their emergency services was not as good as it could be.  There is an opportunity to continue improving engagement with external entities in emergency response.  There is a plan to involve emergency preparedness task teams in the community to assist with emergency responses.</p>	<p>communities, employees and internal and external emergency service providers. This was approved at the end of 2023. The 2024 stakeholder engagement plan includes planned engagements with emergency services and affected communities.</p>
<b>Chapter 2.6—Planning and Financing Reclamation and Closure</b>				
2.6.2.1	<p>Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.</p>		<p>As the mine has been operational for several years, it is not known whether the Reclamation and Closure Plan was in place. However, updates to the closure liability assessment and Closure Plan are undertaken by a third-party service provider. Final Rehab, and Closure Plan is in place and addresses returning to a stable landscape while protecting human health and the environment.  The overall closure goals for Amandelbult are as follows:  - To create non-polluting landforms that have stable outer slopes and do not compromise future land uses on adjacent sites, that contribute to the biodiversity of the area, and which are aesthetically acceptable, as informed by stakeholder consultation  - To also provide the impetus for viable and</p>	<p>Amandelbult has updated the closure plan since then.</p>

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			sustainable land uses, alternative livelihoods, and associated ventures as part of the mine's closure-related endeavors to offset the likely adverse effects of mine closure on the local socioeconomic situation. At the time of the Stage 2 On-site Assessment, the 2022 Closure Plan Assessment was being finalized.	
<b>Chapter 3.1—Fair Labor and Terms of Work</b>				
3.1.2.1.	The operating company shall respect the rights of workers to freedom of association and collective bargaining		Recognition agreements, Wage Agreement, Code of Conduct and Human Rights Policy provided. On-site interviews with workers and union representatives confirm respect for the right to freely associate with workers employed by the operating company. However, Interviews with workers contracted by Business Partner and union representatives indicates the potential for human rights impacts related to harassment and intimidation. Interviews with multiple contract workers mention the threat of termination by their Business Partner if the potential of joining union were raised. While there is strong evidence the operating company respects the right of workers to associate and collectively bargain, it is uncertain whether the rights of contracted workers are fully respected by business partners. It could not be verified if the South African Constitution's protection of the right to freedom of association or the Group Responsible Sourcing Standard for Suppliers (Section 3.5) was being implemented.	Amandelbult is including contract clauses that recognize human rights requirements by all suppliers and implementation of the Responsible Sourcing Standard. This will be augmented by creating awareness on contractor employees' rights to the freedom of association and grievance mechanisms.
3.1.3.3.	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially regarding female workers.		Evidence demonstrates an implemented policy and practice (i.e., training) to address Bullying, Harassment and Victimization and Gender-Based Violence. Panic buttons are issued to female workers. On-site interviews cited instances and the potential for harassment and intimidation of contract workers by employees due to a difference in employment status in the workplace. However, interviews did not	Amandelbult mine has since implemented a Living with dignity program to continue in our efforts to better understand the root causes of prejudice. Ongoing training and support will continue to be provided with a focus on relationships between contract workers and employees.


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			suggest harassment, intimidation or exploitation directed at women because of their gender.	
3.1.5.1.	<p>The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <p>A. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;</p> <p>B. Shall allow for anonymous complaints to be raised and addressed;</p> <p>C. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and</p> <p>D. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</p>		<p>Grievance mechanism evidence provided indicates multiple grievance access points, including an anonymous procedure, "Your Voice". On-site interviews with workers confirm awareness of procedures during induction, human resources onboarding and union representation. Interviews confirm workers may be represented. Employees may avail themselves of the Labor Relations Act provisions in terms of other administrative remedies. Interviews suggest that employees may be more likely to use grievance procedures than contract workers.</p>	<p>Amandelbult Mine has a grievance procedure in place and we will continue working on increasing confidence in the mechanisms in place for all workers and business partners. Amandelbult mine also has a contractor's day that includes awareness of grievance procedures.</p>
<b>Chapter 3.2—Occupational Health and Safety</b>				
3.2.4.1.	<p>The operating company shall implement measures to protect the safety and health of workers including:</p> <p>A. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;</p>		<p>Provided evidence confirms the company implements measures to meet the criteria requirements.</p> <p>~11,000 people go underground daily. There are multiple processes to track and locate personnel, including an underground Wi-Fi system with multiple beacons that detect lamps. Additionally, the mine-rescue system has a portable</p>	<p>Amandelbult mine implemented corrective actions during the corrective action period focused on improving risk management and risk identification. The site will continue to maintain waste segregation areas, and ensure good waste management is implemented i.e. No waste to be</p>





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	<p>B. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;</p> <p>C. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;</p> <p>D. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;</p> <p>E. Providing adequate supervision and control on each shift; and</p> <p>F. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</p>		<p>system with a location device. There is proximity detection for locations and trailing, along with a similar system for winch proximity.</p> <p>Several concerns noted during the assessment indicated that understanding of risks and/or training in such risks and appropriate controls was not always effective. Issues included:</p> <ul style="list-style-type: none"> <li>- Hazardous waste, waste management areas, and mixed waste risks were not managed effectively. Waste segregation areas were messy and disorganized, creating a variety of hazards. Most notably, explosive wastes (oxidizers) are frequently mixed with many other uncharacterized wastes without consideration for compatibility.</li> <li>- There were also several instances of oxygen and acetylene cylinders not being managed according to best practices.</li> <li>- Control measures to prevent drowning at the 49-pollution control dam were not effectively implemented.</li> </ul> <p>When interviewed, workers involved in the above activities were largely unaware of the noted risks. Status from the follow-up assessment: Corrective actions were developed and implemented to address all observed concerns.</p> <ul style="list-style-type: none"> <li>- Procedures for the use of gas cylinders had been updated, and the auditor was able to verify implementation at the shafts. All gas cylinders (oxygen and acetylene) were observed to be secured in a lockable cage with only key personnel having access to the key to prevent uncontrolled use. Training on the use, transport and storage was also provided.</li> <li>- Control measures to prevent drowning at the pollution control dam (49) were found to be in good operational condition. It was also noted that these items were stored in a sealed container to prevent weathering.</li> <li>- Hazardous waste training was arranged to ensure waste sorters are aware of the dangers of explosives and how to manage them at waste sorting areas.</li> </ul>	<p>stored on bare ground, clean up leaks and spills as per internal procedures</p>

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			Waste segregation areas were cleaned up although there was still some waste observed stored on bare ground, with leaks and spills evident.	
<b>Chapter 3.3—Community Health and Safety</b>				
3.3.1.1.	<p>The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> <li>A. General mining operations;</li> <li>B. Operation of mine-related equipment or vehicles on public roads;</li> <li>C. Operational accidents;</li> <li>D. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);</li> <li>E. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);</li> <li>F. Mining-related effects on community demographics, including in-migration of mine workers and others;</li> <li>G. Mining-related impacts on availability of services;</li> <li>H. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and</li> <li>I. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually</li> </ul>	●	<p>Evidence reviewed shows that community, health, and safety impacts caused by general mining operations, operation of mine-related equipment, mine vehicles on public roads, operational incidents, and failure of structural elements (including tailings storage facilities) have been identified and mitigation measures developed to manage these impacts. A comprehensive community health and safety baseline includes important information on communicable and sexually transmitted diseases (including HIV/AIDS and TB). The Sustainable Mining Plan identifies impacts to the receiving socioeconomic environment and identifies mitigation measures related to pressure on housing, infrastructure, and service delivery due to an influx of people. The Sustainable Mining Plan also identifies impacts and mitigation measures specific to hazardous materials and priority ecosystems are not explicitly measured nor are mitigation measures provided.</p> <p>The risks associated with illnesses and deaths from hazardous chemicals and pollution are not included in the Community Health Program but are addressed as part of other environmental health programs. Impacts and mitigation specific to hazardous materials and priority ecosystems are not explicitly measured nor are mitigation measures provided.</p>	As part of community health and safety, Amandelbult mine will be reviewing the scoping exercise for the community health program to understand how gaps identified can be closed out and appropriately communicated to stakeholders

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	transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project.			
<b>Chapter 3.5—Security Arrangements</b>				
3.5.1.2	The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that: A. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force; B. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and C. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury.	●	There is a policy in place for use of force (Group Procedure, Use of Force, version 2.0, 30 August 2018). There is a procedure in place for use of firearms (Platinum Procedure, Control of Firearms and Ammunition, version 2.0, 28 August 2018). The general intent of the requirement is being met. However there is no clear reference to exercise restraint and utilize non-violent means, or the other 2 sub-requirements.	Recent updates were made to the Group Security Policy (2023) as well the Group security standard on the use of force and firearms management (2022). Ongoing training at site and monitoring adherence to standard and policy as well as PGMs group specific policy.
<b>Chapter 4.1—Waste and Materials Management</b>				
4.1.4.1.	A risk-based approach to mine waste assessment and management shall be implemented that includes: A. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project	●	Evidence shows that a risk-based assessment has been conducted for mine waste facilities but not for each facility individually (except for slope failure eval of tailing storage facilities). S2: Initial impact assessments considered risks of all potential risks at the site, and this has been revisited	Waste facilities risk assessments were conducted. Long-term action plan to upgrade non-hazardous and hazardous waste facilities subject to budget availability. Short term plans to segregate waste streams to manage

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	<p>conception and planning phase of the mine life cycle.</p> <p>B. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment, and communities early in the life cycle.</p> <p>C. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and</p> <p>D. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).</p>		<p>during any significant change at the site relating to operations, assets, or site. This is fully inclusive of hazardous material and chemicals' risks and an up-to-date inventory of the same is maintained.</p> <p>The risk assessment evaluates the potential Health, Safety and Environmental impacts of mine waste facilities on health, at different stages of the mine's life cycle. On an ongoing basis, the health and safety risks are considered through work permitting.</p> <p>An internal audit (self-assessment - mineral residue facilities and water management structures) of July 2021 reports that a 'Risk Assessment report shall be prepared for each mineral residue facility within the Group. The level of detail of the Risk Assessment depends on the Consequence Classification of Structures rating for that facility.</p>	<p>risks.</p> <p>Mineral residue facilities findings to be aligned to ongoing implementation of GISTM.</p>
4.1.5.1.	<p>Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).</p>		<p>Review of recent inspection reports from consultants and the Technical Review Panel, along with on-site observations found that the site's facility design and mitigation with respect to identified risks related to mine residue storage and waste management are not consistent in all instances with best available technologies and practices. Specifically, the on-site tour identified issues related to solid waste management from sub-surface activities, vegetation management and legacy design standards for pollution control dams and the tailings storage facility.</p> <p>Follow-up Assessment Updates:  Amandelbult' s Tailings Storage Facility maintenance requirements are addressed in the attached Operations, Maintenance, and Surveillance Manual dated May 2022.</p> <ul style="list-style-type: none"> <li>- Quarterly meetings are undertaken as part of the tailing facility management between the Anglo American Amandelbult tailings engineer and Fraser Alexander who have been appointed to operate the facility on behalf of Anglo American Amandelbult.</li> <li>- A letter received from the Record of Engineer (SRK Consulting) indicates that it is essential to maintain</li> </ul>	<p>A memo was drafted detailing the findings of the team's analysis. In addition to existing documentation and management processes on site, a replacement program along with a vegetation establishment program that will address issues on stability, dust, concurrent rehabilitation and long-term maintenance for closure. There is also work underway to develop a standard around TSF rehabilitation and vegetation cover design management. Ongoing work to manage tailings vegetation through drone herbicide application</p>

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			the vegetation on the slopes to manage slope stability risks, and it was recommended that the tamarisk replacement program with preferred local vegetation be followed to allow the side slope stability management approach to be maintained.	
<b>Chapter 4.2—Water Management</b>				
4.2.4.1	<p>The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:</p> <p>A. Establish enough monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics).</p> <p>B. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics.</p> <p>C. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics.</p> <p>D. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities.</p> <p>E. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and</p> <p>F. Use accredited laboratories capable</p>	●	<p>Groundwater and surface water quality is monitored monthly against the water license limits. The Water Management Plan focuses on water quality management, water metering and data collection. This is supported by the Groundwater and Surface water monitoring procedure, and newly developed Trigger Action Response Plans that incorporate the IRMA water quality guidelines. Accreditation certificates for Aquatico lab were reviewed during the on-site assessment, along with additional Aquatico water license compliance monitoring results. Review of the water quality monitoring reports identified that the site continues to experience exceedances in the water quality limits established in the Water Use License. The site is currently pursuing an amendment to the license, including modification of the limits based on typically used factors of the surrounding area.</p>	<p>The amended WUL has since been approved and this included new water quality limits. The mine will continue to monitor compliance with WUL and develop action plans for identified non-conformances</p>

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	of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables			
4.2.4.4.	<p>The operating company shall develop and implement an adaptive management plan for water that:</p> <p>A. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and</p> <p>B. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.</p>		<p>The Emergency Response and Preparedness document includes Trigger Action Response Plans for critical controls that apply to water levels and pressure only. During the on-site assessment the site was in the process of approving new Trigger Action Response Plans that incorporate the IRMA water quality guidelines and the water use license limits. The culmination of various studies forms a detailed platform for conceptual site modelling with a Tailing Storage Facility focus, and inclusion of groundwater and surface water sources. This is being further extended to capture clean water storage from 2022. The regular water monitoring regime is set up for reporting to the regulatory authority for exceedances. Water modelling provides information to predict scenarios for which mitigation may be planned, then captured in water management plan(s) and the Integrated Water and Waste Management Plan(s) (IWWMP). Information from the water balance supports guidance on where to discharge during seasons, factoring in seasonal rainfall. At the time of the on-site assessment the site did not yet have a formal adaptive management plan in place, but rather a corporate approach supported by the newly established Trigger Action Response Plans..</p>	<p>Amandelbult mine has evolved plans on water management. We will be focusing on formalizing the adaptive water management plan including approval of TARPS</p>
<b>Chapter 4.3—Air Quality</b>				
4.3.2.1	<p>If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents</p>		<p>The Air Quality Management Plan is implemented, and sampling and continuous monitoring generate data for review that has not identified significant impacts during normal operations and blasting. Evidence of blasting reports that measure noise,</p>	<p>Amandelbult has an air quality ambient station and dust buckets on site. Where exceedances/non-compliances are observed Amandelbult mine has an air quality</p>

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	measure to avoid, and where that is not possible, minimize adverse impacts on air quality.		dust (Pm10 and 2.5), carbon monoxide, hydrogen sulfide, sulfur dioxide, nitrous oxide and nitrogen dioxide was provided for review. The floating dust of PM2.5 was below the specified limit of 40µg/m3, and the floating dust of PM10 was below the specified limit of 75 µg/m3. Management plans and root cause investigation have not been developed and implemented for instances where non-compliances have taken place	standard that will be used when conducting root cause analysis investigations