I’

IRMA Initiative for Responsible Mining Assurance

IRMA SURVEILLANCE ASSESSMENT PUBLIC SUMMARY REPORT

MINE SITE

Amandelbult

OPERATING COMPANY

Valterra Platinum

COUNTRY OF OPERATION

South Africa

6 NOVEMBER 2026

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 willingly give their time to provide perspectives and information on mine site performance. IRMA would like to recognize Valterra Platinum Amandelbult and workers, governmental representatives, and members of affected communities for their participation in this audit.

Table of Contents

Acknowledgements 2

Table of Contents 3

Audit Details 6

1. Mine Site Overview 7

1.1 Overview of location 7

1.2 Overview of operation 9

1.2.1. Scope of activities and facilities included in audit 10

1.2.2. Activities or facilities excluded from scope of audit 11

1.2.3. Limitations of audit 11

2. Mine Site Assessment Process 12

2.1 Overview of IRMA Process 12

2.1.1. Scope and Limitation of Audits 12

2.1.2. IRMA Complaints Process 13

2.2 Surveillance Audit Process 13

2.3 Stakeholder Engagement 13

2.3.1. Written comments/inquiries 13

2.3.2. Mine Staff 14

2.3.3. Workers/Contractors 15

2.3.4. Government Agencies and Non-Profit Organizations 16

2.4 Summary of Mine Facilities Visited 18

3. Summary of General Scope Items 19

3.1 General operational status 19

3.1.1. General outcome of compliance monitoring/audits 19

3.1.2. Regulatory inspections, violations, enforcement actions 19

3.1.3. Lawsuits and other external legal, non-regulatory actions 19

3.1.4. Major events, health and safety incidents, and performance records 19

3.2 Stakeholder considerations 21

3.2.1. Stakeholder feedback received by site since prior audit 21

3.2.2. Stakeholder feedback received by auditors/IRMA since prior audit 21

3.3 Summary of Material Operational or Administrative Changes at Site Since the Previous Audit 22

3.4 Site-Specific Issues Identified for Follow-Up Review in Previous Audit 22

3.5 Progress on Previous Corrective Actions 23

3.6 Notable Performance Improvements 47

3.7 Concerns Related to Continued Maintenance of Achievement Level 48

4. General Performance by IRMA Standard Principle and Chapter 49

4.1 Principle 1: Business Integrity 49
Chapter 1.1—Legal Compliance 49
Chapter 1.2—Community and Stakeholder Engagement 50
Chapter 1.3—Human Rights Due Diligence 51
Chapter 1.4—Complaints Mechanism/Access to Remedy 51
Chapter 1.5—Revenue and Payments Transparency 52
4.2 Principle 2: Planning for Positive Legacies 52
Chapter 2.1—Env/Soc Impact Assessment and Management 52
Chapter 2.2—Free, Prior and Informed Consent 53
Chapter 2.3—Community Support and Benefits 53
Chapter 2.4—Resettlement 53
Chapter 2.5—Emergency Preparedness and Response 54
Chapter 2.6—Planning/Financing Reclamation & Closure 55
4.3 Principle 3: Social Responsibility 56
Chapter 3.1—Fair Labor and Terms of Work 56
Chapter 3.2—Occupational Health and Safety 56
Chapter 3.3—Community Health and Safety 58
Chapter 3.4—Conflict-Affected and High-Risk Areas 59
Chapter 3.5—Security Arrangements 59
Chapter 3.6—Artisanal and Small-Scale Mining 60
Chapter 3.7—Cultural Heritage 60
4.4 Principle 4: Environmental Responsibility 60
Chapter 4.1—Waste and Materials Management 60
Chapter 4.2—Water Management 62
Chapter 4.3—Air Quality 62
Chapter 4.4—Noise and Vibration 63
Chapter 4.5—Greenhouse Gas Emissions 64
Chapter 4.6—Biodiversity, Ecological Services and Protected Areas 65
Chapter 4.7—Cyanide Management 66
Chapter 4.8—Mercury Management 66
5. Performance on Critical Requirements 67
5.1 Summary of Site Performance Changes in Critical Requirements 67
6. Next Steps 72
6.1 Corrective Action Plans 72
Principle 1 Outstanding Corrective Action 72
Principle 3 Outstanding Corrective Actions 73
Principle 4 Outstanding Corrective Actions 73
6.2 Timing of Future Audits 74

6.3 Focus Areas for Next Audit 74
Appendix A: Revised Corrective Action Plan 76
Appendix A: Corrective Action Plan

Audit Details

Name of Mine:	Amandelbult Mine
Operating Company:	Valterra Platinum
Mine Owner:	Valterra Platinum
Country of Operation:	South Africa
Mined Material(s):	Platinum, Palladium, Rhodium, Iridium, Ruthenium, Gold and Chrome
# Employees / contractors:	9,390 employees and 5,976 contractors at the time of audit
IRMA Audit Page:	https://responsiblemining.net/Amandelbult
Audit Type:	Surveillance Audit
Audit Dates:	Desktop review: 31 July 2025, 10-14 November 2025 Onsite audit: 18-20 November 2025
Audit Team:	Lead/EHS Assessor (1) EHS Assessor (1) Social Assessor (1) Social Support/Translator (2)
Audit Firm Declaration:	✓ 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) considered within the scope of the Surveillance audit activities. ✓ The audit team members were deemed to have no conflicts of interest with the mine. ✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities. ✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.
Scope of Audit	The scope includes extraction, concentration, 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)
IRMA Achievement Level:	IRMA 50
Achievement Decision Date:	16 February 2024
Achievement Level Expiration Date:	16 February 2027
Authorized Representative:	Glenn Keays, Operations Director, Mining
Representative Signature	
IRMA Reference Number:	IRMA-00091-STD01.0-01-SRV

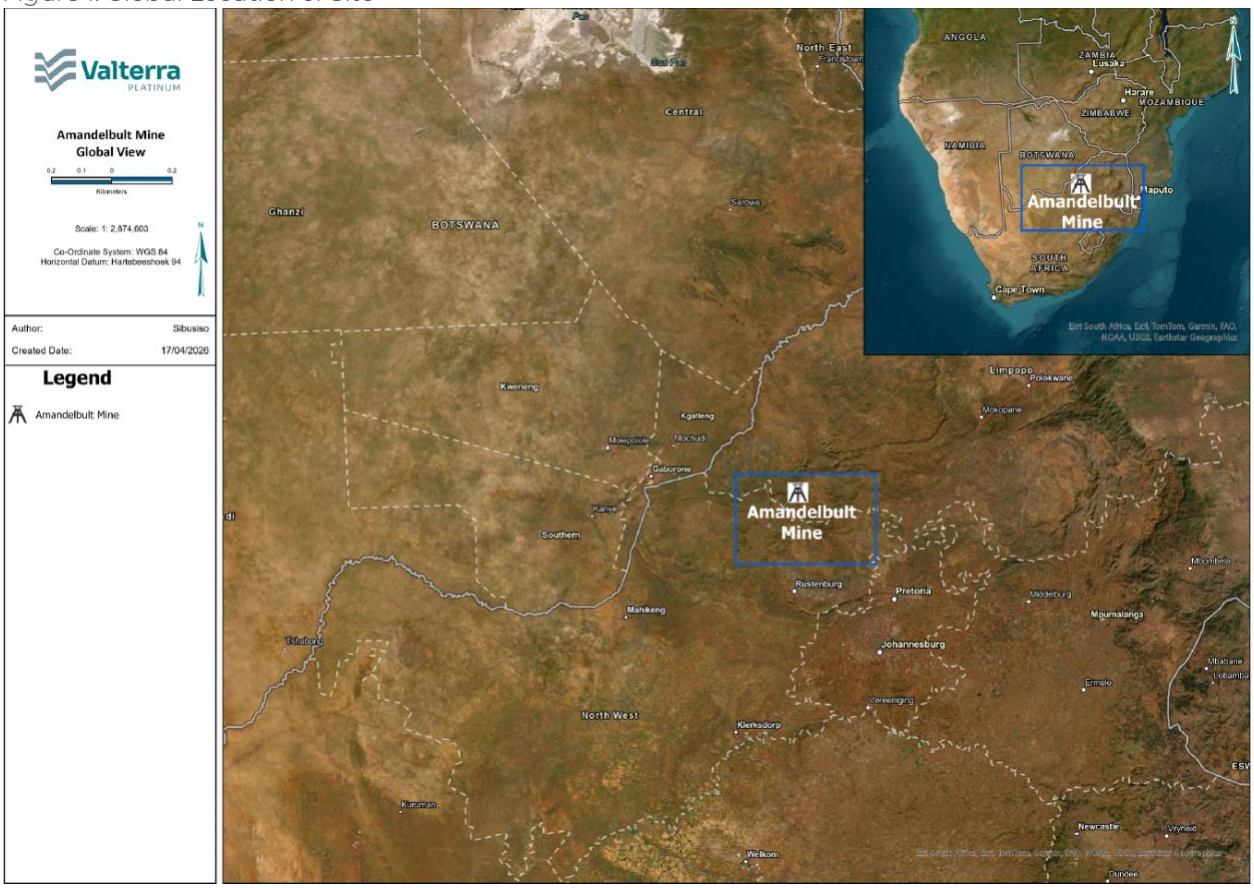
1. Mine Site Overview

1.1 Overview of location

The Amandelbult Complex is located in Limpopo Province, South Africa — on the north-western limb of the Bushveld Igneous Complex (BIC), between the small mining/township centres of Northam and Thabazimbi. The mining right for Amandelbult covers roughly 141 km².

Figure 1 provides a general map indicating the global location of the mine site.

Figure 1: Global Location of Site



Amandelbult sits within the broader region of the Waterberg District / Waterberg Biosphere Reserve, and shares many of the landscape and ecological characteristics typical of that region. The surrounding environment belongs to the broader sub-tropical savanna / bushveld biome (the "Bushveld"). Surface conditions reflect the broader savanna/bushveld landscape of the Waterberg region: gently undulating plains with occasional rocky rises. Soils are generally shallow, sandy to loamy, and often stony, limiting intensive crop agriculture but supporting bushveld vegetation, grazing, and wildlife-based land uses. Topographically, the site concession is relatively flat with surface between about 920 to 1,000 meters above sea level.

Rainfall is modest: the region typically receives on the order of ~380–640 mm/year. The climate features hot, wet summers and cooler, dry winters.

Vegetation is a mixture of grassy savanna and open woodland: thornbushes, acacias and other savanna tree species are interspersed with grassland. This environment supports significant biodiversity: within the Waterberg area more broadly there are hundreds of plant species (many endemic), as well as mammals, birds, reptiles and other fauna characteristic of southern-African savanna ecosystems.

Hydrologically, Amandelbult lies within the catchments of the regional drainage networks feeding into the broader Limpopo River basin. In particular: the lease area drains into catchments for the Bierspruit and Crocodile River – West / Marico water-management area.

Because the broader Waterberg region is recognized as a "water-source area" in a generally dry zone, the watershed functions are important: rivers and streams in the region supply water to downstream communities and maintain riparian ecosystems, wetlands, and biodiversity corridors.

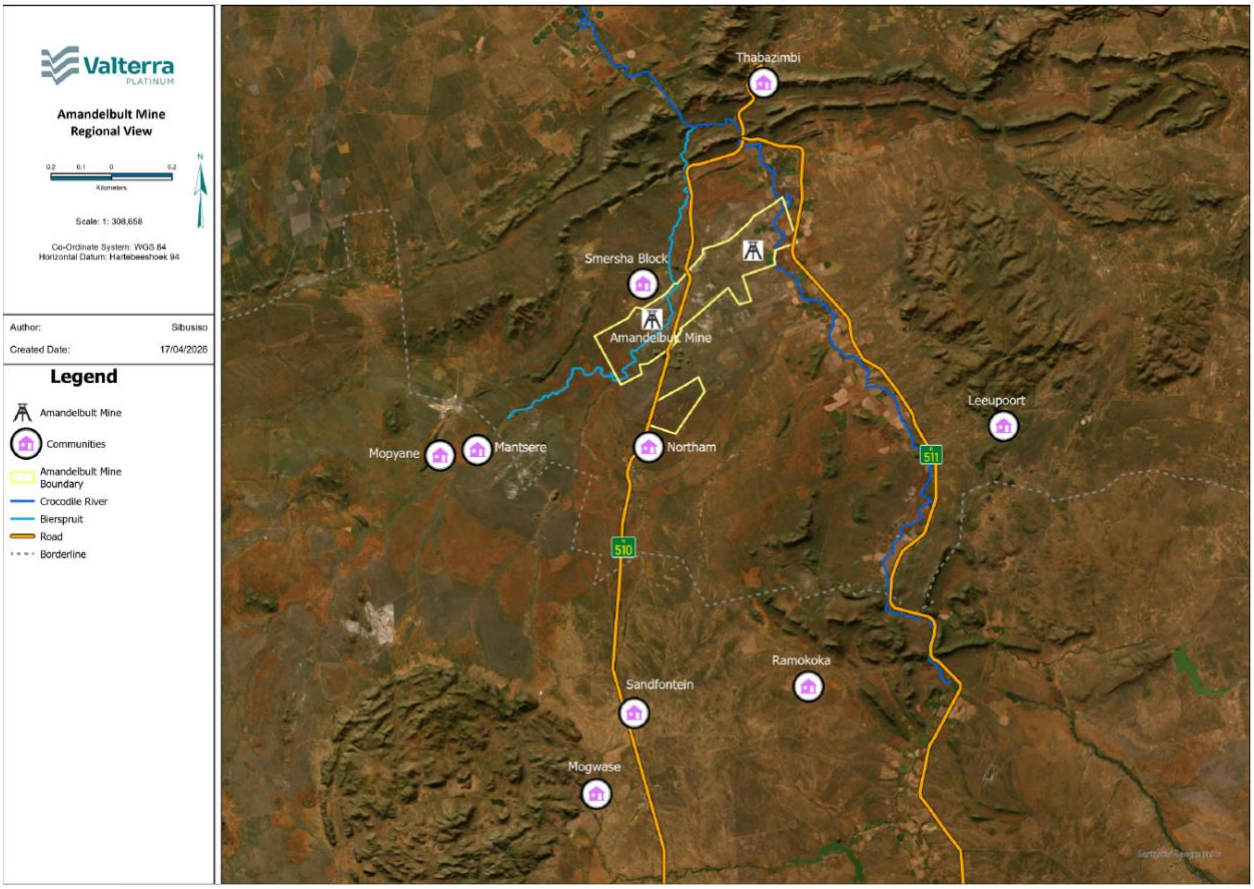
Amandelbult lies on the north-western limb of the Bushveld Igneous Complex (BIC), a vast layered mafic–ultramafic intrusion formed over 2 billion years ago. The complex hosts the Merensky and UG2 reefs, both narrow but laterally extensive horizons enriched in platinum-group metals and chromite (in the UG2 reef). These reefs are the target of Amandelbult's underground mining operations.

In 2024, Anglo American announced a plan to streamline its portfolio. As part of that strategy, it proposed separating (demerging) its platinum business from the rest of the group. On 31 May 2025, the demerger took effect. Subsequently, Anglo American Platinum was renamed Valterra Platinum.

Amandelbult is major regional employer, and provides employment, services, and infrastructure that underpin much of the local economy. At the same time, the region remains relatively undeveloped, with most of the land still in close-to-natural state (savanna woodland, grassland, open range). Land uses immediately around the mine form a mosaic of rural settlements, grazing lands, game farms, and conservation areas, including parts of the Waterberg Biosphere Reserve. Livelihoods in surrounding communities still include grazing, small-scale agriculture, and harvesting of natural resources.

Figure 2 provides a regional map of the mine site location.

Figure 2 :Regional Location of Site



1.2 Overview of operation

The Amandelbult Complex is a large, mature platinum-group metals mine complex, targeting two main platinum group metals (PGM)-bearing “reefs”: the Merensky Reef and the UG2 Reef.

The operation comprises two main underground mines: Tumela Mine and Dishaba Mine and an open cast pit. There are multiple vertical shafts and decline shafts. In total, the working infrastructure includes five vertical shafts and seven decline-shaft systems, extending down to approximately 1,300 meters below surface. Mining is carried out via a mix of conventional and mechanized, trackless processes.

Ore from underground is delivered to on-site concentrators. The complex includes two operational concentrators with two chrome recovery plants to mill the received ore to liberate valuable minerals from gangue, or waste. The minerals are then separated from the gangue to form a concentration from further downstream processing. Concentrated ore is transported off-site to various smelters for smelting and further refining.

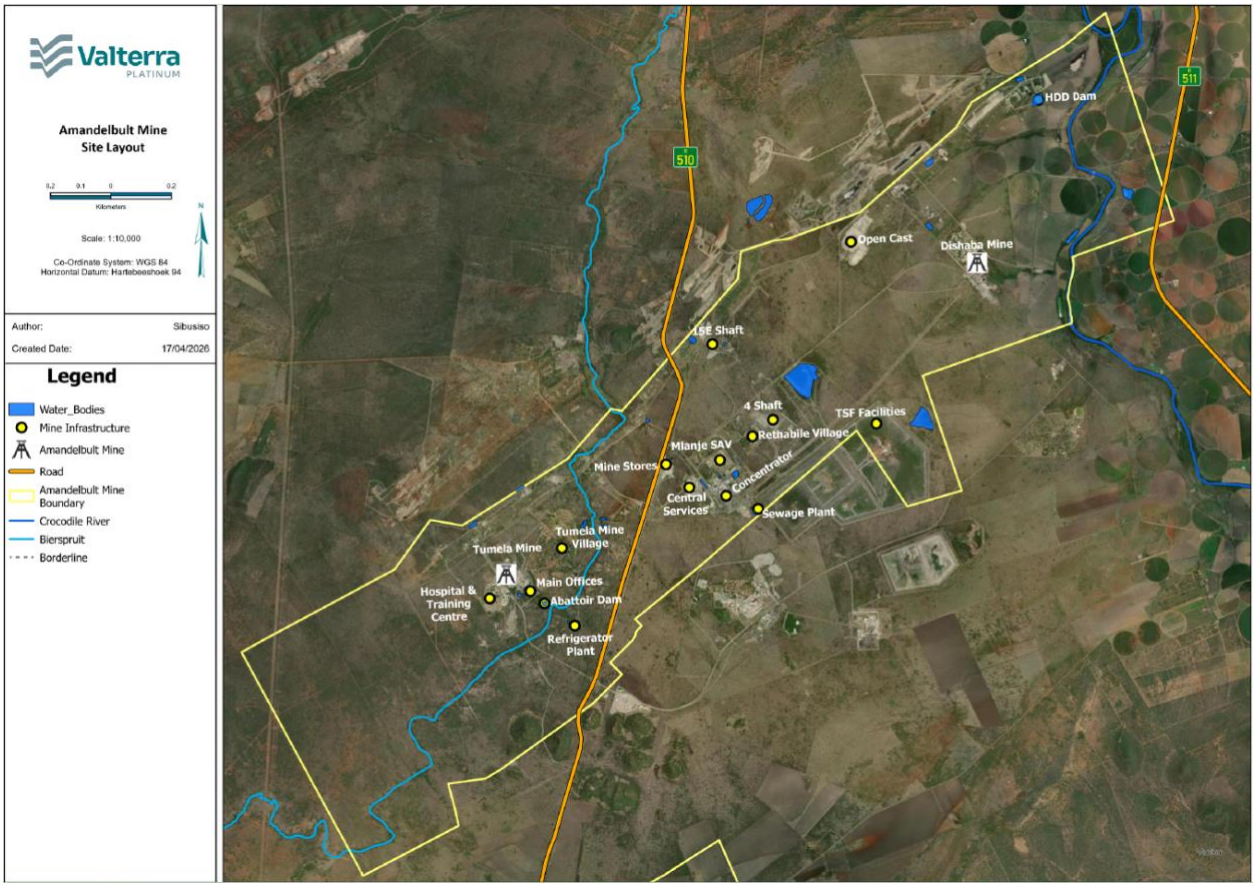
Additionally, feed from the individual concentrators is sent to chrome modules for chrome extraction. Chrome is extracted through spiral gravity separation, where differences in

mineral densities are exploited to separate chromite, the mineral containing chrome, from other minerals.

Tailings are pumped via steel piping to the Amandelbult Tailings Storage Facility, which is formed by four contiguous dams, Dams 1, 2, 3A and 3B. The dams are upstream raised using spigotted tailings. Dams 1 and 2 are currently inactive. Dam 3A and 3B are currently active.

Figure 3 presents the physical configuration of site operations.

Figure 3 :Configuration of Site Operations



1.2.1. Scope of activities and facilities included in audit

The operations and activities in scope for Valterra Platinum Amandelbult audit include all activities at the Amandelbult Complex, including:

- Mining operations:
    - Tumela and Dishaba Mines
- Processing operations:
    - Concentrators and chrome recovery plants (active and inactive)
    - Tailings storage and associated water management
- Ancillary activities, including:

- Various workshops supporting maintenance and upkeep of mobile and fixed equipment for mining and processing
- Waste and chemical management
- Operation of occupational health and other medical facilities

1.2.2. Activities or facilities excluded from scope of audit

No activities, operations or facilities were excluded from the scope of the audit.

1.2.3. Limitations of audit

Adjustments to worker interviews were necessary to accommodate some minor and unavoidable schedule changes by the auditors, due to travel times or administrative hold ups with security access or safety inductions. This resulted in combining some individual interviews, or substituting a small number of workers, when it was discovered that planned interviewees were not on-shift, or were unable to attend for other reasons. These changes impacted a relatively small number of interviewees and did not materially affect the outcome of the interview process.

Three non-profit organisations (NPOs) were planned for interviews as part of the audit, comprising two organisations providing gender-based violence (GBV) victim support services and one organisation focused on child feeding and after-school support. Due to time constraints within the approved audit schedule, one planned interview was not conducted. This arose from extended travel time associated with a preceding stakeholder engagement, which delayed the day's programme. The interview that was missed related to a second GBV victim support organisation. This stakeholder category was nevertheless represented through an interview with the other GBV support organisation, which included three participants. As a result, two of the three planned NPO interviews were completed. Given the overlap in mandate and focus between the GBV support organisations, the missed interview is not considered to have had a material impact on the audit findings or on the overall assessment of external stakeholder engagement outcomes.

None of the concerns noted materially affected the outcome of the audit.

2. Mine Site Assessment Process

2.1 Overview of IRMA Process

There are three primary types of assessment in the IRMA process: a full audit (including the initial audit and subsequent renewal audits), where the mine site is assessed against all relevant IRMA requirements; a surveillance audit, typically conducted 12-18 months after the initial audit, and special audits which are conducted in addition to the normal cycle of audits to assess progress on corrective actions, review significant changes to operations, or follow up on grievances or incidents.

This audit report reflects the outcomes of the surveillance audit. Surveillance audits are intended to be abbreviated audits conducted midway through the certification cycle to verify continued conformity of critical requirements, progress on completing corrective actions, and any focus areas identified by the audit firm. In addition, the audit considers feedback from stakeholders since the previous audit and material changes to operations, personnel, management systems, or the surrounding environment to determine if changes have affected the site's ability to continue to deliver achieved performance scores.

IRMA recognizes four levels of achievement. For a complete description of the assessment process and achievement levels, see IRMA's Certification Body (Audit Firm) Requirements, available on IRMA's web site.

2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining by external auditors. Audits are conducted by approved audit firms using auditors who have undergone IRMA training, meet IRMA competency requirements, and have been deemed to have no conflicts of interest with the mine site under assessment.

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011). In addition to document review, audits include on-site observation of operations and the surrounding environment, review of documents and records, and interviews with site personnel and relevant stakeholders.

IRMA surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the most recent full audit (e.g., initial audit or renewal audit) does not need to be re-established. Typically, surveillance audits are intended to allow the audit firm, who has issued a public verification of performance, to assess the site's ongoing status, review any incidents, confirm regulatory compliance, and review progress on corrective actions to verify that no changes have occurred that would materially affect the site's ability to maintain the achievement level.

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

IRMA stakeholders who wish to file a complaint related to the mine site assessment process may submit feedback on the IRMA website. [1]Details on the complaints process can be found in IRMA's Issues Resolution Procedure which can be accessed from the main IRMA website. [2]

2.2 Surveillance Audit Process

The surveillance audit process includes a desktop review and onsite audit by the audit firm. The on-site audit can include a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if any, governmental agencies, documentation review, and visits to operational areas, surrounding area, and other locations including surrounding communities.

2.3 Stakeholder Engagement

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

During execution of the draft surveillance audit stakeholder engagement plan the social auditor worked with the Mine to facilitate participation by selected stakeholders. The interviewees represent a cross-section of stakeholders from the Mine's area of influence that included non-profit organization representatives, community activists, farmers and landowners and business forum representatives.

2.3.1. Written comments/inquiries

No formal or informal comments were received from stakeholders following the publication of the initial audit report.

On 24 October 2025, twenty-five days prior to the surveillance visit, the assessment was announced on the ERM CVS website, IRMA's website and LinkedIn page, and through IRMA's free distribution newsletter. The announcement included an invitation to stakeholders to submit written comments about the environmental and social performance of the Valterra Platinum Amandelbult mine to the audit firm via email, online stakeholder feedback form or a dedicated voicemail line, and invitation to participate in the assessment. The announcement was prepared in English, isiXhosa, Sepedi and Setswana.

To inform stakeholders about the audit, Amandelbult distributed the audit announcement to the local communities and to workers in order to invite all interested parties and the general public to participate in the interview process or to submit formal or written statements.

One formal comment was received leading up to the Surveillance Audit. This was from a contractor or supplier of services to the site. The provided feedback was about accessing purchase orders and their inability to complete the (health and safety) Passport 360 orientation.

The stakeholder requested to be interviewed virtually. The auditor engaged with the stakeholder telephonically (as requested). The information received was that the stakeholder has been a supplier to the mine for about five years, and since the change to Valterra, and subsequent changes in personnel at the site, they have had no feedback on updating their purchase order, tenders or other opportunities.

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.

Position/Role
Manager P&O Operations
Stakeholder engagement Manager
Specialist Shira
Section Manager Planning and reporting
Senior Manager Commercial
Incident and Grievance Officer
Section Manager Environmental
Section Manager Employee Relations
Section Manager Community Economic Dev
Section Manager Verification
Protection Services Manager Operations
Section Manager Stakeholder Relations
Resident Engineer
Snr Civil Eng Mineral Res Water Mngt
Resident Engineer
Occupational Hygienist
Section Manager People & Organisation Manager
Specialist Inclusion & Diversity and Wellbeing

Ops Inclusive Procurement Advisor
SHE Manager
Snr HRD Practitioner Prot Services
M&E Specialist
Commercial Manager
Section Manager - Permitting
Section Engineering Manager
Senior Specialist Employee Benefits

2.3.3. Workers/Contractors

During the surveillance audit, ERM CVS conducted a total of 29 scheduled worker engagements, including 22 individual interviews, and 4 group interviews (3, 4, 5 and 6 people). Interviews included a total of 38 workers.

Scheduled worker interviews were supplemented by 12 additional impromptu interviews with individuals or groups in various areas of the mine during the environmental, health, and safety portion of the onsite audit. In total, 49 workers were interviewed during the surveillance audit.

Prior to the onsite audit, ERM CVS selected a sample of workers and contractors for interviews. At the time of the onsite audit, the site reported 9,390 direct employees and 5,976 contractors (total 15,366 workers). The selection aimed to ensure diversity in age, gender, length of service at the Amandelbult Mine and role or function (including managers, coordinators, technicians, and machine operators), as well as the differing employment experience of direct employees and contracted workers.

The list of workers selected for interviews was made up of both company and contractor employees, and for each selected worker, there was a backup worker of the same gender or position within the company or contractor.

At the scheduled worker interviews, typical topics discussed included:

- Employee contract, understanding and access to leave, pay and collective bargaining
- The mine's respect towards workers and their rights
- Any understanding of community benefits
- Health and safety on site, including personal safety, access to personal protective equipment (PPE), raising health & safety related issues, Stop-work Authority.
- Emergency planning and preparedness
- Access to, and management of, grievance mechanisms.
- Any notable discrimination, harassment, abuse or victimization.

The engagements took place onsite in designated conference rooms and offices. The worker interviews were conducted without management personnel present. Participants for group interviews were selected by ERM CVS to avoid bias or influence employee responses.

Date	Meeting Type	Attendees	Notes
	Remote Individual Interview	1 (1F)	1 x Contractor
18 November 2025	Individual Interviews	5 (4M, 1F)	3 x Employees; 2 x Contractors
19 November 2025	Individual Interviews	12 (11M, 1F)	Employees and Contractors
19 November 2025	Group interview (Group of 6)	6 (4M, 2F)	2x Employees, 4x Contractors
20 November 2025	Individual Interviews	7 (4M, 3F)	7x Employees
20 November 2025	Group interview (Group of 3)	3 (3M)	3 x Employees
20 November 2025	Group interview (Group of 4)	4 (2M, 2F)	4x Employees
Total	50 workers: 38 scheduled interviews (28M, 10F); 12 impromptu interviews		

2.3.4. Government Agencies and Non-Profit Organizations

Engagement for the surveillance audit focused on local municipal councilors only, as a means of assessing ongoing public leadership engagement. A total of 6 councilors (three from each relevant local municipality) were invited to the session, however only 2 attended. These two represented two different local municipalities.

Date	Government Institution	Location of Meeting	Total Number of Attendees
19 November 2025	Local Municipality - Thabazimbi Local Municipality (Treasury Councilor and former Mayor)	Amandelbult Recreation Club	1F
19 November 2025	Local Municipality -Moses Kotane Local (Ward Councilor)	Amandelbult Recreation Club	1M
Total			2 (1F, 1M)

A selection of other external groups were selected for engagement based on previous findings from the audit, and relevant local context, as follows:

Date	Organization / Stakeholder Group	Location of Meeting	Total Number of Attendees
18 November 2025	Subsistence Farmers	Farm, Ramakokastad area	2
18 November 2025	NPO – GBV Victim Empowerment	NPO offices, Northam	3
18 November 2025	NPO – Underprivileged child feeding	NPO premises, Thabazimbi	1
19 November 2025	Neighboring commercial farmers/landowners	On various farms neighboring the mine site	3
19 November 2025	Business Forums - individuals representing local community employment and business interests	Amandelbult Recreation Club	4
Total			13

2.4 Summary of Mine Facilities Visited

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

Operational areas	Concentrators Tumela Rock Winder Workshop Tumela Service Winder Workshop Tumela Man Winder Workshop Dishaba Upper underground operations Tswelopele waste management facility Amandelbult Tailings Storage Facility
Non-operational areas visited	Camp 5 - Game Farm
Surrounding Communities	Ramakokastad / Mmorogong Thabazimbi Northam Neighboring farmers – north of site along R511 and R510

3. Summary of General Scope Items

General information regarding the mine's ongoing performance is summarized in this section. Summary information related to specific chapters is provided in Section 4.0.

3.1 General operational status

The surveillance assessment concluded the mine has continued to maintain the basic systems identified in the prior assessment.

3.1.1. General outcome of compliance monitoring/audits

A comprehensive legal audit is conducted on a regular basis (every 4 years) and follow-up actions are tracked in the mine's action tracking system, Isometrix. The most recent audit was completed in 2022, prior to the initial audit. The status of corrective actions was reviewed during this audit. The audit was conducted and documented on a department-by-department basis. A sample of department-specific reports and action trackers were reviewed and there were no significant outstanding items that were not fully addressed or in progress.

3.1.2. Regulatory inspections, violations, enforcement actions

There were no observed public records or mine disclosures (via annual reports, shareholder notices, or otherwise) of formal enforcement actions (e.g., criminal prosecutions, large administrative fines or license suspensions) specific to Amandelbult in the public press or regulator portals during the 2023–2025 period.

3.1.3. Lawsuits and other external legal, non-regulatory actions

There are no known public records or mine disclosures of civil lawsuits or criminal prosecutions filed specifically against "Amandelbult Mine" in the 2023–2025 period.

Historically there has been labour-related litigation involving Anglo American Platinum in South African courts, which may have been relevant to operations across the group (including Amandelbult) but there were no such actions naming the mine specifically.

Similarly, NGOs and rights groups have intervened in or supported litigation against Anglo (the former parent company of Valterra Platinum) entities (again, not Amandelbult-specific) but there is no record of active litigation related to environmental or human-rights issues involving Valterra or Amandelbult.

3.1.4. Major events, health and safety incidents, and performance records

Year-over year the site has seen a reduced number of incidents; & Total Recordable Injuries (TRI) and Total Recordable Injury Frequency Rate (TRIFR). The TRIFR for 2025 for the

Amandelbult Complex was 1.86, below target. Out of the specific areas, one was above target, Tumela shaft with a TRIFR of 2.96 (target of 2.79).

Fatality in October 2024 – On 8 Oct 2024, a face scraper operator was fatally injured while conducting maintenance in Dishaba Upper. According to the provided documentation, the face scraper operator was working in the path of the scraper, and the scraper operator mistook headlamp movements as a signal to re-start operations. The scraper winch was not locked out to prevent operation.

Immediate actions included support for the worker's family and included executive involvement. Briefings on the incident were conducted with executives, organized labor and the broader workforce.

Investigation took place in conjunction with Department of Mineral Resources and Energy (DMRE). The investigation team included several experts, involved parties, senior personnel and dedicated incident investigators. It identified multiple failures in existing processes and led to several corrective actions and improvement recommendations. All of these had been completed at the time of assessment, with the exception of implementing a winch proximity detection system – new technology which was undergoing testing.

Flood in February 2025 – A significant rainfall event in February 2025 caused flooding that affected underground workings at Amandelbult. Unusually high surface water and runoff overwhelmed mine water management systems, leading to inundation of some parts of the underground infrastructure, primarily in Tumela Shaft. There were no casualties, but the underground workings were evacuated and operations at the Tumela Shaft were temporarily suspended while assessing the impact, pumping out water, and securing underground workings. Access to parts of the surface operations was also impacted by flood waters, with damaged roads and bridges.

According to the information provided, the recovery of inundated workings and resuming of normal operations took several months.

Following the flooding and subsequent investigations, in addition to repair and reinstatement of operations, a significant number of infrastructure improvements were made to identify and seal or better protect the various points where flood water entered the mine. Several actions were taken to control and reduce the large volume of excess water, and learnings from this incident were incorporated into future emergency management planning and water management planning.

At the time of assessment, key physical repairs and improvements had all been completed, with ongoing and wide-ranging repairs to some roads and waterways still underway. Additional actions to further upgrade water management facilities were under consideration and were discussed during the assessment.

3.2 Stakeholder considerations

3.2.1. Stakeholder feedback received by site since prior audit

Between the previous audit and the current review period (2024-2025), the site recorded a total of 67 grievances and 31 issues, along with two formal appeals. The breakdown by year is as follows:

- 2024: 41 grievances and 17 issues
- 2025: 26 grievances and 14 issues

The grievances raised during this period covered a broad range of topics, including training, environmental and infrastructure concerns, community and social matters, governance disputes, and employee relations. Key themes are summarized below:

- Training: Stakeholders expressed concerns about missing certificates, extended cadetship programs, delays in transport for portable skills training, and disciplinary actions following protest-related disruptions.
- Environmental & Infrastructure: Issues included water discharge into local rivers and structural defects in recently handed-over facilities, such as leaks and collapsed ceilings.
- Community & Social: Complaints focused on access restrictions, oversized speed humps, requests for employment and bursaries, unclear cadetship verification processes, unfulfilled contractor commitments, and delays in engagement with local forums.
- Governance: Pending legal disputes over traditional leadership and internal conflicts within a local consortium were noted.
- Employee Relations: Allegations of unfair dismissal and intimidation during disciplinary hearings were escalated for investigation and referred to external parties in line with labour laws.

3.2.2. Stakeholder feedback received by auditors/IRMA since prior audit

No stakeholder feedback or complaints were received by the auditors following publication of the initial audit report. Feedback received during pre-audit engagement for the surveillance audit is summarized in Section 2.3.1.

3.3 Summary of Material Operational or Administrative Changes at Site Since the Previous Audit

Transition to Valterra Platinum

On 31 May 2025, Valterra Platinum was demerged from Anglo American as part of major structural changes, becoming a standalone entity. Valterra has retained core Anglo American policies temporarily, with a one-year window to adapt and localize them.

- A fit-for-purpose operating model was introduced, streamlining governance and technical capabilities to suit Valterra's independent context.
- Leadership changes were implemented in Q1 2025 as part of the demerger process, and a new Employee Value Proposition was rolled out, emphasizing wellbeing, inclusion, and strong labour relations.
- Sustainability, previously a standalone strategy, has now been integrated across all operations.

Prior to the demerger, largely in response to decreased platinum group metals (PGM) prices, Anglo American Platinum implemented cost-saving measures to improve operational efficiency. As part of this process, the company initiated a Section 189A consultation process under South African labour law, which involved negotiations with labour unions such as the National Union of Mineworkers (NUM) and United Association of South Africa (UAS). This culminated in a significant restructuring and retrenchment process in 2024, leading to approximately 3,700 jobs being affected across its South African operations, including Amandelbult mine.

3.4 Site-Specific Issues Identified for Follow-Up Review in Previous Audit

The following issues were identified for follow-up review in the initial audit report:

- The applicability of Free, Prior and Informed Consent (FPIC) to local communities, specifically in relation to the Baphalane-Ba-Mantserre community (Chapter 2.2.)
- Follow-up on actions taken to address concerns specific to waste and chemical management observed during the initial audit (Requirement 3.2.2.4.)
- Stakeholder engagement regarding risk of exposure to HIV/AIDS (Requirement 3.3.4.2.)
- Effectiveness of the implementation of the Trigger Action Response Plan (Requirement 4.2.5.2.)
- Implementation of mitigation measures from the 2021 biodiversity assessment (Requirement 4.6.1.1.)

An overview of mine performance on these issues and relevant findings from the surveillance audit are addressed in Section 4.

3.5 Progress on Previous Corrective Actions

The following table provides a summary of the corrective action plan provided in the previous audit report and notes where progress has been made. If auditors believe a change in rating is warranted, this is documented in the critical requirements summary table in Section 5. In addition, ongoing management of corrective actions, including those below and any new corrective actions arising from this audit, are addressed in Section 6 of this report

Requirement #	1.1.1.1.
Requirement	The operating company shall comply with all applicable host country laws in relation to the mining project.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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 License 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.
Planned Corrective Action(s) from previous report	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.

Comments on Progress	At the time of the surveillance audit, the mine was transitioning between external managers for legal service, part of whose role includes keeping up to date with legislative changes. This is considered a live process with frequent updates and the mine reported that they had current and up-to-date information on relevant existing and proposed legislation. Actions from the Water Contamination Action Plan, 2023, were being implemented on a prioritized basis, due to the investment required, and were progressing on-plan. A budget was allocated for water treatment, such as an engineered wetland. Water quality tracking was improved. The mine's water use license (WUL) was updated in 2023, and further updates were being sought in order to address the issue of ambient water quality not meeting some of the required limits. The mine is still required to look for and pursue opportunities for water quality improvements. The mine was also seeking an amendment of the WUL to address changing volumes. Weekly reports on overtime compliance were being maintained and reported to leadership. A sample of recent reports were reviewed, and the majority of departments were noted to be 100% compliant. The evidence provided supports maintaining the rating of Substantially Meets.

Requirement #	1.2.2.2.
Requirement	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.
Critical	Yes
Rating from previous report	Substantially meets

Justification from previous report	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). 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. b. Interview - relevant management and technical specialists are made available for specific community engagement meetings or to resolve grievances. 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). 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 the latter was not established at the time of the audit due to ongoing internal community conflict. * 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. 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. 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. 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. 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.
Planned Corrective Action(s) from previous report	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.
Comments on Progress	External stakeholder interviews conducted during surveillance audit included a range of stakeholder groups and individuals. The interviews confirm improved regular engagement is taking place with most interested external parties. This is supported through new structures within the host communities that reflect different values and viewpoints of different stakeholder groups. It was noted through interviews with external stakeholders, that the site Stakeholder Engagement Team is accessible by most stakeholders through their Open Door policy, and will participate in engagement meetings on request (if outside of scheduled engagement). The evidence provided included the 2025 annual schedule for engagement forums (e.g. Leadership Accountability Forum, Supplier Days, Community Engagement Forums). According to the site team, the Community Engagement Forum model described in the initial audit was not working as intended, as there was conflict between stakeholders which disrupted proceedings. The site has set up a Local Accountability Forum (LAF) and different forums for business (local procurement and employment opportunities), and has set up a broader Community Engagement forum which includes other key stakeholders and vulnerable groups. Coupled with this, an Engagement Protocol has been developed to guide lodging of grievances and code of conduct for meetings. This separates conflicting stakeholders and focusses discussion for effective engagement. While demonstrable improvement has been observed, the limited scope of the surveillance audit did not allow the audit team to verify the effectiveness of the new engagement mechanisms with a broad range of stakeholders. This rating should remain Substantially Meets, as further verification (external interviews) is required to validate a fully meet rating for this critical requirement.

Requirement #	1.3.2.1.
Requirement	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,
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	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. 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 employees if they were to indicate an interest in joining a union.
Planned Corrective Action(s) from previous report	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.
Comments on Progress	The site has continued to follow its process to identify and assess potential human rights risks. The last update of the Social and Human Rights Impact and Risk Assessment (SHIRA) to identify and analyze Human Rights was completed in March 2025.

	The evidence provided supports upgrading the rating to Fully Meets.

Requirement #	1.3.3.3.
Requirement	Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall: i. Cease or change the activity responsible for the impact; and 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; 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; 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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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. 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).
Planned Corrective Action(s) from previous report	Amandelbult mine will continue to implement actions coming out of the Social and human rights impact and risk analysis (SHIRA), with a focus on strengthening bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers and contractors on right to freedom of association.
Comments on Progress	The site has increased the awareness of bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers and contractors on right to freedom of association. This was confirmed through worker interviews, as most respondents were aware of their rights and had not encountered sexual harassment in the workplace. However, some victimization and bullying was reported. The evidence provided supports maintaining the rating of Substantially Meets. This requirement will need to be reviewed further at the next renewal audit.

Requirement #	1.5.5.1.
Requirement	The operating company shall develop, document, and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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 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.
Planned Corrective Action(s) from previous report	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.
Comments on Progress	Job selling continues to be an endemic issue in the area. Internally, the mine strengthened its requirement for mandatory anti-corruption compliance training and reported a 98.65% completion rate. An awareness campaign related to job scams included community awareness and resulted in greater reporting. The mine continues to pursue investigations of reported incidents and awareness. The evidence provided supports maintaining the rating of Substantially Meets. This requirement will need to be reviewed further at the next renewal audit.

Requirement #	**2.5.2.1.**
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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). 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. 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
Planned Corrective Action(s) from previous report	An approved EPRP was developed in consultation with affected 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.
Comments on Progress	The Stakeholder Engagement Plan (SEP) was revised in March 2025 to shift from one-way communication to consultation, incorporating feedback from affected communities and prioritizing vulnerable groups. Annual engagements, emergency drills, and training sessions now include high-risk communities and external emergency responders. Updated Dam Breach Analysis and SHIRA 2025 risk findings, informed by stakeholder input, shaped the revised engagement strategy. The Emergency Management Plan (EMP), updated in August 2025, aligns with the Global Industry Standard on Tailings Management (GISTM) principles and integrated updated risk assessments, evacuation maps, and enhanced early warning systems. Practical implementation was demonstrated through a multi-stakeholder Tailings Storage Facility failure drill in March 2025, with participants identifying gaps (delayed action confirmation, limited senior leadership presence), lessons logged into Isometrix for continuous improvement and deadlines for actions assigned through 2026. These actions collectively show progress toward consultative planning and improved emergency preparedness, addressing previous audit concerns. The evidence provided supports re-rating this requirement to Fully Meets.

Requirement #	2.6.2.1.
Requirement	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,
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	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 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.
Planned Corrective Action(s) from previous report	Amandelbult has updated the closure plan since then.
Comments on Progress	At the time of the last assessment, the required annual closure liability assessment was not finalized, and would therefore be submitted late. The Final Closure Plan was completed in December 2023. The Closure Liability Assessment was updated and submitted. The site improved their process for ensuring updates are completed, and subsequent reports have been on time. The evidence provided supports re-rating this requirement to Fully Meets.

Requirement #	3.1.2.1.
Requirement	The operating company shall respect the rights of workers to freedom of association and collective bargaining.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	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.
Planned Corrective Action(s) from previous report	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.
Comments on Progress	The site has increased awareness of contract workers with regard to their right to freedom of association through inductions with workers and with contractors though Operational-Union Partnership Forums (OUPF) and Business Community Engagements. These forums provide a platform for awareness raising and grievance management with contractors. Some contractor employees reported being discouraged from joining a union, and a few stated outright that their employers told them it was not allowed. However, in general, interviews reflected a positive change in that the majority of workers (contractors and employees), felt they had the right to join a union without fear of discrimination or termination. The evidence provided supports maintaining the rating of Substantially Meets.

Requirement #	3.1.3.3.
Requirement	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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.
Planned Corrective Action(s) from previous report	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.
Comments on Progress	The site has increased awareness of bullying, harassment and victimization and anti-gender-based violence campaigns through the Living with Dignity programme, and training for workers and contractors. The site has also put additional focus on the inclusion of contractor workers across key aspects of their human rights management, including induction and awareness around gender-based violence and sexual harassment, and Social and Human Rights Impact and Risk Assessment. This was confirmed through worker interview, as most respondents were aware of their rights and had not encountered gender-based violence or harassment in the workplace. However, some victimisation and bullying was still reported, specifically amongst contract workers. Feedback was received regarding female workers regarding gender discrimination. While the site engages Business Partners (contractor management) through the Operational-Union Partnership Forums, it was not clear which training and awareness campaigns have been implemented to address specific issues around contractors and employees.

	The evidence provided supports closure of the actions, demonstrating implementation. The rating should remain Substantially Meets, as further verification (worker interviews) is required to validate a fully meet rating for this requirement.

Requirement #	3.1.5.1.
Requirement	The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum: 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; b. Shall allow for anonymous complaints to be raised and addressed; c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and 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.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	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.
Planned Corrective Action(s) from previous report	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.

Comments on Progress	The grievance mechanisms are still in place, and the site has made ongoing efforts to create awareness around grievance mechanism for workers and contractors. However, the worker interviews indicated that mechanisms for raising anonymous grievances are still not widely known or trusted by workers, especially contract workers. In addition, there is still reluctance by some workers to formerly raise grievances about superiors (e.g. supervisors) our of concern that this could lead to victimization. The evidence provided supports the rating of Substantially Meets.

Requirement #	3.2.4.1.
Requirement	The operating company shall implement measures to protect the safety and health of workers including: a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; 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; 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; 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; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.
Critical	Yes (a and b)
Rating from previous report	Substantially Meets
Justification from previous report	Provided evidence confirms the company implements measures to meet the criteria requirements. ~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 system with a location. device. There is proximity detection for locations and trialing, along with a similar system for winch proximity. 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: - 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. - There were also several instances of oxygen and acetylene cylinders not being managed according to best practices. - Control measures to prevent drowning at the 49-pollution control dam were not effectively implemented. 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. - 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. - 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. - 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
Planned Corrective Action(s) from previous report	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 stored on bare ground, clean up leaks and spills as per internal procedures.

Comments on Progress	Significant improvements to health and safety were noted at the waste management area. These included: • A new, covered, waste sorting facility, with sorting tables, replacing activities conducted under a tree. • Improved ablution block and eating areas for workers. • Clearly marked concrete walkways around the site, segregated from traffic. Working on the implementation of Vehicle Detection and Proximity Detection (VDS/PDS) systems at the site. Training for waste sorters was improved and refreshed to address the proper recognition, segregation and safe handling of hazardous wastes. Across the mine, improvements to the provision and inspection/maintenance of flotation devices for work near dams were reported. Additionally, training for personnel on the use of equipment and rescue procedures was conducted. Interviewed workers were generally aware of risks in their work areas. Workers operating or working around scrapers, in particular, were aware of the risks and controls associated with the 2024 fatality and follow-up actions. In general, the management of compressed gas cylinders and other hazardous materials has noticeably improved. There were still some observed examples of compressed gas cylinders not properly secured. Some additional observations were noted during the surveillance audit (See Section 4.3.). While improvements and corrective actions were noteworthy, the evidence continues to support a rating of Substantially Meets.

Requirement #	3.3.1.1.
Requirement	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: a. General mining operations; b. Operation of mine-related equipment or vehicles on public roads; c. Operational accidents; d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1); e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6)

	f. Mining-related effects on community demographics, including in-migration of mine workers and others; g. Mining-related impacts on availability of services; h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and 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, Ebola virus disease) that could occur as a result of the mining project.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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. 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.
Planned Corrective Action(s) from previous report	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.
Comments on Progress	Since the previous audit, Amandelbult's Community Health and Safety Plan has been formalized and now integrates risks associated with hazardous chemicals and pollution, which were previously excluded. Hazardous chemical risks and tailings dam failure scenarios

	are integrated into risk assessments, with implemented mitigation measures, such as engineering interventions and controlled storage. Vulnerable groups are considered in risk assessments. Risks are addressed through environmental health programs and linked to broader mitigation strategies. Additionally, the Social and human rights impact and risk analysis (SHIRA) has been updated to include community health impacts and mitigation measures. The evidence supports an improved rating of Fully Meets, for this requirement.

Requirement #	3.5.1.2.
Requirement	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-defence or the defense of others if there is an imminent threat of death or serious injury
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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.
Planned Corrective Action(s) from previous report	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
Comments on Progress	The Group Security Policy (2023) and Security Standard on use of force and firearms (2022) now include clear references to restraint, proportionality, and compliance with UN principles, including limiting the use of firearms to self-defence of defence of others. Training programs are ongoing, with annual refreshers and Regulation 21 of the Firearms Control Regulations (under the Firearms Control Act 2000) compliance verified. Firearm issuance is well-documented through registers, and monitoring shows no non-compliance. The mine has completed the actions set out in the initial audit Corrective Action Plan. Therefore, this requirement can be upgraded to Fully meets.

Requirement #	**4.1.4.1.**
Requirement	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 conception and planning phase of the mine life cycle. 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. 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 D. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c)
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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). 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.

	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. 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.
Planned Corrective Action(s) from previous report	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 risks. Mineral residue facilities findings to be aligned to ongoing implementation of GISTM.
Comments on Progress	Waste facility (TSF) risk assessments were updated in line with Global Industry Standard on Tailings Management (GISTM) requirements, and all actions from the latest reports were complete. Additionally, the waste management strategy was updated in 2025, area-by-area, and the waste management procedure was updated (but not yet approved, at the time of audit). Training for waste sorters was improved and refreshed. The waste facility was significantly upgraded since the initial IRMA audit site visit. The evidence supports an improved rating of Fully Meets, for this requirement.

Requirement #	**4.1.5.1.**
Requirement	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP)
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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. Follow-up Assessment Updates: Amandelbult's Tailings Storage Facility maintenance requirements are addressed in the attached Operations, Maintenance, and Surveillance Manual dated May 2022. 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. 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.
Planned Corrective Action(s) from previous report	A memo was drafted detailing the findings of the team's analysis. In addition to existing documentation and management processes on site, 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.
Comments on Progress	The mine presented several new and improved programs related to vegetation management on the tailings storage facility (TSF). In particular, the mine commissioned an examination of vegetation and erosion to provide guidance on addressing findings regarding alien vegetation on the Amandelbult TSF and ensuring erosion risks and dust are adequately managed. A visit to the facility and discussion with responsible personnel showed that personnel were aware of key issues and that activities to improve vegetation control were ongoing. Progress should be reviewed during future assessments. The current status of corrective actions supports a continued rating of Substantially Meets, for this requirement.

Requirement #	4.2.4.1.
Requirement	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: a. Establish a sufficient number of 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); b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics; c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics; d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities; e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and f. Use accredited laboratories capable of detecting contaminants at levels below the values in the Water Quality Criteria by End-Use Tables.
Critical	Yes (a through e)
Rating from previous report	Substantially meets
Justification from previous report	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.

Planned Corrective Action(s) from previous report	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.
Comments on Progress	The mine's water use license (WUL) was updated in 2023, and further updates were being sought in order to address the issue of ambient water quality not meeting some of the required limits. The mine is still required to look for and pursue opportunities for water quality improvements. The mine was also seeking an amendment of the WUL to address changing volumes. Water quality continues to be tracked on a monthly basis, against the revised limits. Actions from the Water Contamination Action Plan, 2023, were being implemented on a prioritized basis, due to the investment required, and were progressing on-plan. A budget was allocated (2026) for water treatment, such as an engineered wetland. Water quality tracking was improved. Progress should be reviewed during future assessments. Meanwhile, the evidence supports a continued rating of Substantially Meets, for this requirement.

Requirement #	4.2.4.4.
Requirement	The operating company shall develop and implement an adaptive management plan for water that: 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 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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	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 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.
Planned Corrective Action(s) from previous report	Amandelbult mine has evolved plans on water management. We will be focusing on formalizing the adaptive water management plan including approval of TARPS.
Comments on Progress	The Adaptive Water Management Plan (AWMP) was finalized and approved. It was reviewed in June 2025 and adopted in October 2025, and now includes mitigations related to the major flooding event experienced by the mine in February 2025. The AWMP also includes approved Triger Action Plans (TARPs) for critical controls. The evidence supports a revised rating of Fully Meets for this requirement.

Requirement #	**4.3.2.1.**
Requirement	If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.
Critical	Yes
Rating from previous report	Substantially Meets

Justification from previous report	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 of75 µg/m3. Management plans and root cause investigation have not been developed and implemented for instances where non-compliances have taken place.
Planned Corrective Action(s) from previous report	Amandelbult has an air quality ambient station and dust buckets on site. Where exceedances/non-compliances are observed Amandelbult mine has an air quality standard that will be used when conducting root cause analysis investigations
Comments on Progress	Historical non-compliances were investigated under the Nonconformity and Incident Management Procedure (AMB-COM-SHE-PRO-0002), with mitigation measures implemented. PM10 and PM2.5 levels have remained below regulatory limits throughout 2025. The evidence supports a revised rating of Fully Meets for this requirement.

3.6 Notable Performance Improvements

Principle 1 (Business Integrity) notable performance improvements observed by the auditors include:

- The mine has begun collaborating with business partners to audit their compliance status and is looking for ways to expand this activity.
- There has been a significant amount of work improving and adding to the mine's existing programs related to gender-based violence and Women in Mining. Amandelbult has been recognized for best practices in this area.
- The auditors noted consistent engagement and accessibility via forums and with external stakeholders, and an increased awareness of gender-based violence and victim support programmes amongst stakeholders.

Principle 2 (Planning and Managing for Positive Legacies) notable performance improvements observed by the auditors include:

- The Stakeholder Engagement Plan was revised to enable two-way consultation, incorporating vulnerability mapping and human rights considerations.

- The Emergency Management Plan was updated to Version 4.1, fully aligned with the Global Industry Standard on Tailings Management (GISTM) Principle 13, and now includes enhanced early warning systems, humanitarian aid provisions, and clarified roles through a responsibilities matrix. Practical implementation was evidenced by a Tailings Storage Facility failure desktop drill involving internal and external stakeholders, supported by improved alert systems and engagement strategies.

Principle 3 (Social Responsibility) notable performance improvements observed by the auditors include:

- The mine and expanded its community health HIV/TB programs, achieving strong performance targets and introducing innovations like Smart Lockers to facilitate medication access. Health system strengthening improved facility compliance from five to eight ideal facilities.

Principle 4 (Environmental Responsibility) notable performance improvements observed by the auditors include:

- The waste facility was significantly upgraded since the initial IRMA audit site visit.
- Enhanced dust fallout monitoring was implemented in high-risk areas using ASTM D1739 standards. Four fixed ambient monitoring stations were installed in November 2024 to provide real-time data on particulate matter, blast-related gases, and meteorological conditions.
- Amandelbult implemented a number of energy efficiency and renewable projects for greenhouse gases reduction, reducing their energy consumption and advancing land rehabilitation for biodiversity.

3.7 Concerns Related to Continued Maintenance of Achievement Level

Evidence gathered during interviews and discussions with workers during both the initial IRMA audits and the current surveillance pointed to concerns related to some contractors not respecting the rights of workers to freedom of association and collective bargaining. Critical requirements related to these issues (primarily 3.1.2.1) have not been re-rated at this time as this was an ongoing issue and there was no evidence of performance deterioration.

All related requirements will be fully re-evaluated at the renewal audit (anticipated in 2026) and if the concerns remain unchanged, then there is a possibility of re-rating performance downwards. This could impact the mine's overall achievement level.

4. General Performance by IRMA Standard Principle and Chapter

Because the surveillance audit is limited in scope, this audit did not include assessment of every requirement in every chapter. An overview of current performance from the surveillance audit for each chapter that was audited (partially or wholly) is provided in the following subsections.

4.1 Principle 1: Business Integrity

During the previous audit, this principal received an overall score of 76%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 1.1—Legal Compliance

Chapter 1.1. was fully audited during the surveillance audit. Progress on the critical requirement 1.1.1.1., which was rated as Substantially Meets at the initial audit, is summarized in Section 3.5. Discussions and documents reviewed during this assessment continued to support that rating.

At the time of the surveillance audit, the mine was transitioning between external managers for legal service, part of whose role includes keeping up to date with legislative changes. This is considered a live process with frequent updates and the mine reported that they had current and up-to-date information on relevant existing and proposed legislation.

Compliance monitoring continues to include self-audits and external 3rd-party audits. A review of the compliance management system is included in ISO 14001. The comprehensive legal audit is conducted on a four-year basis. The last audit was completed in 2022, and the next is planned for 2026.

Actions related to the specific gaps noted during the IRMA Initial audit were being implemented on a prioritized basis.

The environmental team has three reports submitted annually. These are tracked with the Isometrix tool, and the on-time submission was noted in the related summaries. The reports are required by the following:

- Water use license
- Waste license (does not include mineral waste) Audits as per National Environmental Management: Waste Act 2008 (NEMWA) Norms and standards (GN1093 and 926)
- Env, Management Program

The mine's occupational health activities continue to be subject to an annual external audit covering management of the entire program for occupational medicine and include a look at the relationship with occupational hygiene. There is also an annual trauma audit and an

annual visit from Department of Health, because of the mine's hospital license. No significant findings were reported at the most recent visit. The mine continues to use Isometrix to record permit conditions and track related actions, including corrective actions, when gaps are noticed. Verification audits take place to verify if actions are completed in a timely manner.

The mine has checked its processes and performance expectations against IRMA requirements in various relevant topics such as environment, but at the time of the surveillance audit, they have not mapped all IRMA requirements against the full body of regulatory requirements to verify whether they are always applying the strictest expectations. However, many internal requirements are reportedly more stringent than regulatory or IRMA requirements and the mine's practice is to follow the most stringent, e.g. Zero Waste to Landfill, best practice legislation for conveyor belts, Anglo Social Way. It was observed that where relevant, IRMA requirements were incorporated into internal programs.

Chapter 1.2—Community and Stakeholder Engagement

Chapter 1.2 was partially audited during the surveillance audit. Auditing was focused primarily on four requirements from this chapter, including critical requirement 1.2.2.2. Progress on the critical requirement, 1.2.2.2, is summarized in Section 3.5.

Positive progress has been observed in community and stakeholder engagement since the initial audit. Implementation of a broad-based Community Engagement Forum has evolved into more topic-specific discussion groups.

Interviews with external stakeholders indicated that they perceive the site to be approachable and accessible to engagement. However, participants in other business and unemployment forums reflected the transactional nature of communications (i.e. engagement focused on specific, short-term interactions rather than ongoing dialogue) with the mine and the limited local contracting and employment opportunities for local residents and businesses.

Key initiatives since the initial audit include the development and implementation of a standard "Engagement Protocol" for all stakeholder and the site to apply during their engagement. The site carried out an ongoing survey with leadership on the engagements they have, and the effectiveness of feedback provided to them on issues raised was observed. The site continues to capture grievances in a grievance log, (from all engagements) and maintains a register of engagement proposed (plan) and completed during an annual cycle (January-December).

New measures also include regular (aimed to be twice a year) "Roadshows" to engage with communities and provide feedback, and regular slots on local radio stations (once per week) to provide information and take calls from the public on their operations.

In June/July 2025, the site hosted Roadshows for the launch of Valterra brand in local communities, supported by email notifications and follow ups. The mine has developed an Engagement Protocol to support productive discussions with communities and stakeholders.

The site also holds bilateral engagement with local leadership and within the site team (e.g. involving Human Resources in engagement with business forums, and Engineering teams with engagement with leadership forums). The information provided by the site showed a decrease in social unrest and protest relating to the site's operations since the initial audit, and a decrease in grievances relating to "poor feedback".

Attendance records and communication materials were verified, confirming that these engagements were inclusive of community leaders and local government representatives. Topics discussed included discussions on security arrangements, emergency response, grievance processes, and gender-based violence awareness.

Chapter 1.3—Human Rights Due Diligence

Chapter 1.3 was partially audited during the surveillance audit. Auditing was focused primarily on four requirements from this chapter, including three critical requirements. Critical requirement 1.3.1.1. was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit including the Valterra Platinum Code of Conduct (January 2025) , confirmed the prior rating for this critical requirement. Progress on the critical requirements, 1.3.2.1. and 1.3.3.3., is summarized in Section 3.5.

The site has continued to follow its established ongoing process to identify and assess potential human rights risks through two key mechanisms. First, it conducts annual Social and Human Rights Impact and Risk Assessments (SHIRA) to evaluate risks across operations, with the most recent update completed in June 2025. In addition to the general SHIRA, subject-specific assessments, such as those for Tailings Storage Facilities, are undertaken to address risks associated with particular operational areas. Second, the company has initiated external verification by appointing a consultant to perform a Human Rights Impact Assessment; however, this process was still underway at the time of the audit and has not yet been finalized.

As part of the transition from Anglo American to Valterra, the company is also developing Social Standards to inform relevant updates to its social management systems, including updating and enhancing human rights risk assessments. These efforts demonstrate a commitment to improving governance and aligning with international best practices, though some processes remain incomplete at this stage.

Chapter 1.4—Complaints Mechanism/Access to Remedy

Chapter 1.4 was partially audited during the surveillance audit. Auditing was focused primarily on five requirements from this chapter, including critical requirement 1.4.1.1. This chapter's critical requirement was rated as fully meets in the initial audit and discussions and documents reviewed during this assessment continued to support that rating.

A major update in procedure for community grievances was completed in 2024. One key change was to clarify the role and function of the appeals committee. The mine has consolidated the tracking of issues and grievances in Isometrix, from where, data is extracted for analysis, and dashboards are developed.

A gender-based violence regulation for mining was introduced in November 2024. Amandelbult representatives are participating in several related forums and the mine's programs have been recognized by several organizations as an example of best practice. The mine has partnered with several stakeholders, including labour organizations, to communicate policies and complaint mechanisms.

Since the initial IRMA audit, the mine has tried to engage stakeholders and enhance processes for gathering, recording and responding to grievances. There is now a stakeholder engagement protocol for meetings, which is shared with stakeholders, and clearer recording and close-out of grievances.

This was reflected by external stakeholders confirming the improved accessibility of the site engagement teams. Perception surveys were conducted in the community to gauge levels of awareness, starting in 2024 with the Leadership Accountability Forum (LAF). In general, responsible personnel reported that rates of grievances have increased for topics where reporting processes have improved and are stable or decreased for areas of concern where the mine has had effective processes for responding to grievances for a prolonged time.

Currently, a review of grievances by external stakeholders indicates that most complaints focus on employment and contract related issues. The accessibility, usage and effectiveness of the external grievance mechanism channels will be further reviewed at the next audit.

Chapter 1.5—Revenue and Payments Transparency

Chapter 1.5 was partially audited during the surveillance audit. Auditing was focused primarily on five requirements from this chapter, including critical requirement 1.5.5.1 which was rated as Substantially Meets in the initial audit. Progress on the critical requirement is summarized in Section 3.5.

The mine strengthened its requirement for mandatory anti-corruption compliance training and reported a 98.65% completion rate at the time of assessment.

An awareness campaign related to job scams was observed to include community awareness and encouraged greater reporting. Increased reporting suggests the community may have become more alert to scams.

The mine continued to pursue investigations of reported incidents and awareness.

4.2 Principle 2: Planning for Positive Legacies

During the previous audit, this principal received an overall score of 81%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 2.1—Env/Soc Impact Assessment and Management

Chapter 2.1 was partially audited during the surveillance audit. Auditing was focused primarily on twelve requirements from this chapter, including critical requirement 2.1.3.1. The critical requirement 2.1.3.1. was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit, including EIA Scoping Reports, confirmed the prior rating for this critical requirement.

The site's original Environmental Social Impact Assessment (ESIA) was completed under South African licensing requirements and included full public participation. Since the initial IRMA audit, the site undertook project-related Environmental Impact Assessments (EIAs), including a Tailings Storage Facility (TSF) reclamation project EIA. The EIAs were authorized in terms of South African legislative requirements.

Monitoring and compliance audits remain in place, with results shared annually with regulators and stakeholders.

Chapter 2.2—Free, Prior and Informed Consent

Chapter 2.2. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that the issues addressed in the chapter continue to not be applicable at the mine.

While the Company has an applicable Indigenous Peoples policy which considers Free Prior Informed Consent, no Indigenous Peoples meeting the International Finance Corporation definition were identified. Collectively Indigenous Peoples in South Africa are known as Khoi - San but have not been formally recognized by national legislation. 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 (individually or collectively) have not claimed Indigenous rights in the site's area of influence.

Chapter 2.3—Community Support and Benefits

Chapter 2.3 was partially audited during the surveillance audit. Auditing was focused primarily on three requirements from this chapter. There are no critical requirements in this chapter.

Surveillance audit interviews with community members and representatives indicate a mixture of support for Amandelbult's community benefits and support programmes. The feedback received included positive benefits of successful social and labor plan projects and responsiveness to urgent community needs (e.g. provision of water to communities where municipal infrastructure has failed), to disappointment with employment, contracting and procurement-related opportunities.

Community leaders and non-profit representatives also emphasized the potential for improved collaboration and communications on community-prioritized infrastructure projects, especially in rural areas where infrastructure is limited and the needs of vulnerable groups are highest. It was, however, noted from a number of sources, that there are ongoing severe social, economic and political difficulties in the local municipalities within the area of impact of the mine. These challenges have increased the competition for resources and opportunities, and contributed to polarized views regarding all mining activities in the area.

Chapter 2.4—Resettlement

Chapter 2.4. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that no mining-related activities have resulted or could potentially result

in physical or economic displacement and involuntary resettlement of people. Therefore, the issues addressed in the chapter continue to not be applicable at the mine.

Chapter 2.5—Emergency Preparedness and Response

Chapter 2.5 was Partially audited during the surveillance audit. Auditing was focused primarily on the two critical requirements from this chapter (2.5.1.1., 2.5.2.1.). Critical requirement 2.5.1.1. was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement. Progress on the critical requirement 2.5.2.1, is summarized in Section 3.5.

Evidence reviewed during the surveillance audit included updated Emergency Management Plan (EMP) Version 4.1, Stakeholder Engagement Plan (SEP) Version 2.0, revised in March 2025, and records of the Desktop Drill conducted in March 2025.

Since the previous audit, Amandelbult Complex has implemented substantial improvements in emergency preparedness and stakeholder engagement. The sections of the Stakeholder Engagement Plan (SEP) related to emergency planning focus on strengthening consultation processes during emergency preparedness activities. These updates build on the existing requirement for two-way dialogue under Chapter 1.2, but now place greater focus on actively considering feedback from affected stakeholders and its integration before finalizing emergency response decisions.

The plan integrates vulnerability considerations and human rights principles to prioritize marginalized groups such as the elderly, children, and people with disabilities. Annual engagements are scheduled with high-risk communities like Rethabile and Mlanje, focusing on awareness sessions, tailings storage facility (TSF) drills, and training of community safety representatives. Farmers along the Crocodile and Bierspruit Rivers are included through one-on-one visits and alternative media channels, while external emergency responders such as Thabazimbi Disaster Management, South African Police Service (SAPS), and Waterberg District Municipality participate in annual emergency planning workshops. The SEP also incorporates updated Dam Breach Analysis (DBA) and Social and human rights impact and risk analysis (SHIRA) 2025 findings to guide risk-based prioritization and engagement strategies. A content management framework (GISTM Playbook) is in place so that all communication uses plain language and visual aids, supported by surveys and grievance trend analysis to monitor effectiveness.

The Emergency Management Plan (EMP) Version 4.1, updated in August 2025, was developed in accordance with the Global Industry Standard on Tailings Management (GISTM) Principle 13. It includes site-specific Emergency Preparedness and Response Plans informed by credible failure scenarios, updated evacuation maps, and a comprehensive emergency response checklist developed in collaboration with specialized emergency response personnel, including fire and rescue teams, medical responders, and technical experts in tailings and structural integrity.

Early warning systems have been enhanced with sirens audible within a 15 km radius, complemented by multi-channel alerts via WhatsApp and phone calls to downstream stakeholders. The EMP mandates are regularly tested through desktop and live drills, with

reviews done every three years or following material changes. Document history confirms updates in December 2023 and July 2025.

Practical implementation of these plans was evidenced by the TSF Failure Desktop Drill conducted in March 2025, which simulated a cascading failure scenario under a Probable Maximum Precipitation (PMP) event. The drill involved internal teams and external stakeholders, including Northam Platinum, Waterberg and Thabazimbi Disaster Management, and local farmers. While initial gaps were noted, such as limited senior leadership presence and delayed confirmation of actions, participants demonstrated improved collaboration and communication as the exercise progressed. Attendance registers show an increased amount of participants. Mine personnel have been assigned the actions in Isometrix, with deadlines extending through 2026.

Chapter 2.6—Planning/Financing Reclamation & Closure

Chapter 2.6 was partially audited during the surveillance audit. Auditing was focused primarily on seven requirements from this chapter, including three critical requirements (2.6.2.1., 2.6.2.6., 2.6.4.1.). Progress on the critical requirement 2.6.2.1. is summarized in Section 3.5. Critical requirements 2.6.2.6. and 2.6.4.1. were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement.

At the time of the initial IRMA assessment, the annual closure liability assessment was not finalized. Subsequently, the annual closure liability assessment was submitted late. The process has been strengthened and subsequent assessments have been completed and submitted on time.

The mine reported no stakeholder requests for the closure plan or related data since the initial audit. Internal Stakeholder engagement was conducted to allow all departments to get input, if necessary. Any closure related gaps and ongoing commitments are risk-ranked to ensure appropriate prioritization.

Closure plans in progress at the time of the surveillance visit include applying for permission to close an old shaft and concentrator (Tumela Upper infrastructure & Merensky Concentrator.) Work will commence as soon as permits are granted. Long term plans are up to 30-years out. The roadmap for ongoing strategy execution was observed to be on track.

As evidence of successfully completed rehabilitation, the mine reported that a farmer is now planting crops on a 35-hectare rehabilitated site. No engagement was carried out with this stakeholder during the surveillance audit. However, it is recommended that engagement with this farmer or relevant representatives is completed during the renewal audit to verify.

Annual financial surety instruments are mine-specific. There were no changes to the process or responsible individuals due to the demerger with Anglo American and transition to Valterra.

The mine is currently working on an Environmental Impact Assessment (EIA) for reclamation/remining of one dam in the tailings facility.

4.3 Principle 3: Social Responsibility

During the previous audit, this principal received an overall score of 87%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 3.1—Fair Labor and Terms of Work

Chapter 3.1 was partially audited during the surveillance audit. Auditing was focused primarily on eleven requirements from this chapter, including six critical requirements. Of the six critical requirements, three (3.1.7.2., 3.1.7.3., 3.1.8.1.) were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for these critical requirements. Progress on critical requirements 3.1.2.1., 3.1.3.3., 3.1.5.1 is summarized in Section 3.5.

Pursuant to requirement in 3.1.2.1, Valterra has continued to implement the Anglo American Responsible Sourcing Standard for Suppliers (2024). Section 3.5 of the Standard references "Permit freedom of association and allow unrestricted access to confidential grievance mechanisms". During interviews, mine employees reported full freedom to join a union (or not) at their choosing. Some contractor employees, however, reported being discouraged from doing so, and a few stated outright that their employers told them it was not allowed.

While substantial efforts have been made in terms of 3.1.3.3. (prevent and address harassment), there are still discrepancies between employees and contractors on site. There is an expectation that contractors have internal grievance mechanisms and this requirement is communicated through on-boarding processes. The mine evaluates contractors' processes for ensuring fair and effective processes. More robust non-conformance clauses are being included in contracts to place a greater focus on social non-conformance and grievances.

The employment induction now contains information about grievance processes for employees, with an added focus on mental health and harassment/gender-based violence related issues. This is supported by the Living With Dignity Hub, which was implemented in 2022 and presents a new mechanism for reporting. Case managers are assigned to individual investigations. This also extends to business partners and the community.

During surveillance interviews, several contractor employees reported a fear of reprisal from reporting grievances. Interviewed employees (both direct workers and contractors) did not always know if complaints they raised had resulted in any investigation or action. Further engagement will be needed to demonstrate the effectiveness of the operational-level grievance mechanism.

Chapter 3.2—Occupational Health and Safety

Chapter 3.2 was partially audited during the surveillance audit. Auditing was focused primarily on seven requirements from this chapter, including critical requirement 3.2.4.1. and overall safety performance. Progress on the critical requirement, 3.2.4.1, which was rated as substantially meets, is summarized in Section 3.5.

The mine experienced some health and safety incidents in 2024, including a fatality (see Section 3.1.4. for more details).

During the initial audit, there were a number of health and safety concerns noted at the waste management area related to the chemical and waste management. This topic was marked for follow-up at the surveillance audit. Since then, the mine implemented corrective actions and significant improvements were noted during the surveillance audit.

In general, the management of hazardous materials has noticeably improved since the initial audit.

Overall, there was notable refinement to the mine's overall safety process, including a new approach based on five pillars of safety:

1. Protect safety and health
2. Protect our environment
3. Respect labour and human rights
4. Contribute to thriving communities
5. Conduct all business fairly and with integrity

The changes observed since initial audit involved:

- Enhanced leadership training and visible leadership roles at all levels. Leaders are encouraged to be visible in safety meetings, conduct regular site walkthroughs, and actively engage with frontline workers.
- Encouraging supervisors to record and report work stoppages.
- Supervisors are now required to halt work for safety or quality concerns and formally log each stoppage, including context, actions taken, and any follow-up.
- A stronger emphasis on reporting and tracking high potential hazards (HPH) and high potential incidents. The mine has refined its process for identifying, categorizing, and longitudinally tracking near-misses and high-risk events (capturing detailed root-cause analysis, leading indicators, and follow-up prevention plans).

During employee interviews, feedback was provided by employees that the five-pillar approach empowers them to speak up and stop unsafe work and encourages motivation and ownership through collaborative compliance.

The mine has completed its corrective action plan related to critical requirement 3.2.4.1, however, some examples of poor safety practice were noted during the surveillance audit, including:

- Reports of poor drinking water quality underground;
- A notable drop in access to personal protective equipment (PPE) was reported. These were reportedly due to supply issues which were mostly resolved;
- Some unlabeled/poorly labeled circuit breaker panels underground, and incomplete safety precautions, such as readily accessible eyewash and fire response equipment, at a temporary locomotive charging area were observed during the audit

Chapter 3.3—Community Health and Safety

Chapter 3.3 was partially audited during the desktop surveillance audit. Auditing was focused primarily on five requirements from this chapter, including critical requirement 3.3.1.1, which was previously rated Substantially Meets. Progress on this critical requirement is summarized in Section 3.5.

The Social and human rights impact and risk analysis (SHIRA), updated in 2024, now includes community health and safety impacts and mitigation requirements. According to the site team, this update was developed in consultation with local community stakeholders.

Tailings facilities are monitored through dam breach analyses, and communities close to potential inundation zones have been engaged to raise awareness of associated risks. Waste storage sites continue to be monitored to prevent any potential community impact.

At the time of the surveillance audit, the mine had initiated a review of its hazardous material transportation and storage procedures, with a focus on minimizing transit-related risks. This review was ongoing and had not yet been concluded during the audit period.

Stakeholder engagement regarding the risk of exposure to HIV/AIDS was marked for follow-up at the initial audit. At the time of the initial audit, the mine did not consider HIV/AIDS as a key topic for engagement due to the associated stigma in the surrounding communities. Since then, the mine has initiated active engagement with communities on HIV/AIDS awareness and prevention, incorporating it into its broader health and wellness programs. The mine's health programs have expanded significantly to address disease burdens in the region, particularly HIV and TB. In September 2025, the HIV/TB Treatment Support program met its full annual target of 439 patients, with 59% new on treatment and 41% returning to care. The Children and Adolescent Support program reached 91% of its target, enrolling 1,111 individuals., and the Treatment Dispensing, Distribution, and Collection Support registered 509 clients.

Health System Strengthening efforts have resulted in eight health facilities now meeting national standards, up from five in the previous cycle. While some underperforming facilities were decommissioned, observations supported communities retaining access to quality-assured care, Smart Lockers have been introduced to improve access to medication and allow discreet and convenient collection while reducing clinic queues.

The mine continues to collaborate with the Department of Health and other stakeholders to align its programs with national strategies. Communication occurs through monthly dashboards, quarterly reports, internal publications, and community roadshows. Awareness campaigns continue to leverage radio slots and local forums, including leadership accountability sessions with community leaders and municipal representatives. Attendance records from 2025 confirm active stakeholder participation in health-related community engagement sessions, including those focused on HIV/AIDS awareness and prevention

Amandelbult continues to acknowledge cumulative impacts such as population influx, which strains local health systems, and is collaborating with other mining houses to support mobile clinics and infrastructure upgrades.

The mine is integrating health initiatives within public systems to reduce dependency on mining operations. Additional programs, such as substance abuse prevention and gender-based violence support, were developed to address emerging social risks.

Chapter 3.4—Conflict-Affected and High-Risk Areas

Chapter 3.4. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that the issues addressed in the chapter continue to not be applicable at the mine. The audit team noted report of endemic corruption in South Africa but for the purposes of this audit these assessments do not meet the threshold of conflict-affected or high-risk area.

Chapter 3.5—Security Arrangements

Chapter 3.5 was partially audited during the surveillance audit. Auditing was focused primarily on four requirements from this chapter, including critical requirement 3.5.1.2, which was rated Substantially Meets during the previous audit. Progress on the critical requirement is summarized in Section 3.5.

The mine has implemented updates to the Group Security Policy (2023) and the Group Security Standard on the use of force and firearms management (2022). The Group Security Policy (2023) has been updated since the initial audit and now includes references that were missing at that time. These updates were verified through documented evidence from 2025 and complemented by ongoing training programs for security personnel and business partners, including annual refresher courses on firearm competency in compliance with Regulation 21 of the Firearms Control Act, 2000 (Act 60 of 2000). Training registers for current security personnel were reviewed as part of this verification. Training certificates and attendance registers were reviewed and confirmed. The Firearms Handing Over Certificate Register was also reviewed to verify if procedures for firearm management are being followed.

During the surveillance audit, the interviewed security personnel indicated that they were clearly briefed on the principles governing the use of force and firearms. According to interviews, the team understood that force should only be applied when absolutely necessary and in proportion to the threat, with firearms reserved for situations involving imminent danger to life. They emphasized that these guidelines were communicated as part of their training and reinforced through ongoing monitoring and audits. Security management also highlighted that the objective (minimizing harm, protecting human rights, and maintaining operational integrity) were consistently stressed during briefings and performance reviews.

Since the initial audit, the mine has incorporated psychometric testing and human rights impact assessments into its security management process. These assessments identify vulnerable groups and design controls to mitigate risks effectively. Evidence reviewed included completed assessment reports, documented risk mitigation plans, and training materials used to brief relevant personnel on findings and actions. Community engagement in 2025 included discussions on security, which was verified via attendance records and communication materials.

Organizational changes, specifically the transition from Anglo to Valterra, have not affected security obligations. The mine's performance reflects continuous improvement, with critical gaps addressed and stakeholder engagement enhanced since the last audit. Updates were developed in consultation with stakeholders through community forums and internal security committees.

Chapter 3.6—Artisanal and Small-Scale Mining

Chapter 3.6 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that there are no artisanal and small-scale mining entities present on the concession or close to Amandelbult operations. This chapter therefore continues to not be applicable at the mine.

Chapter 3.7—Cultural Heritage

This chapter was not audited in this surveillance audit.

4.4 Principle 4: Environmental Responsibility

During the previous audit, this principle received an overall score of 74%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 4.1—Waste and Materials Management

Chapter 4.1 was partially audited during the surveillance audit. Auditing was focused primarily on eight requirements from this chapter, including four critical requirements (4.1.4.1, 4.1.5.1, 4.1.5.6) and on corrective actions from the previous assessment, including site visits to the waste yard and tailings storage facility. Critical requirement 4.1.5.6. was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement. Critical requirement 4.1.8.1. continues to not be applicable. Progress on critical requirements 4.1.4.1. and 4.1.5.1., which were rated Substantially Meets at the initial audit, is summarized in Section 3.5.

Concerns during the previous assessment included completion of actions related to Global Industry Standard on Tailings Management (GISTM) assessments. Tailings Storage Facility (TSF) risk assessments were updated in line with GISTM requirements. Since the initial audit, the mine has been subject to ongoing GISTM audits, the latest of which took place in 2024. The Independent Technical Review Board (ITRB), which functions independently from the GISTM audit process, held its most recent sitting in January 2025 and issued its final report in February 2025. The 2024 GISTM disclosures for Amandelbult TSF was subjected to third party validation. Findings were primarily related to required material testing and risk assessments, and were all completed by the time of the surveillance audit.

No major monitoring changes have been made as a result of the GISTM process, although an increased number of piezometers were installed. Technical personnel reported that they are exploring possibilities for a remote monitoring service.

The mine's waste management strategy was updated in 2025, area-by-area. The waste management procedure was also updated but was not yet approved at the time of the surveillance assessment. The mine's "zero waste to landfill" goal has led to ongoing diversion investigations related to several waste streams.

The waste facility was significantly upgraded since the initial IRMA audit site visit. Improvements noted and discussed included:

- New waste sorting facility – covered, with sorting tables, to replace sorting under a tree.
- Additional and improved/upgraded segregated storage areas, on a slab, with a planned roof to be constructed by end of 2025.
- Concrete walkways were constructed around site; clearly marked and segregated from traffic.
- Contractor workers received and improved ablution block and dedicated, hygienic cooking/eating areas.

A tour of the main waste handling facility showed improvements to both waste management and the safe and hygienic operation of the facility. Ongoing improvements both there and at satellite areas are planned. Site personnel regularly visit incineration facilities to ensure wastes sent there were being handled appropriately.

During the visit to the waste facility, personnel discussed a number of community programs, including:

- A new facility to store and present re-usable waste materials where they can be collected by community members,
- Sending used timber, such as pallets to communities,
- Training and awareness activities in communities,
- Litter picking projects, mainly by volunteer mine personnel, but trying to get more community members involved.

The mine implemented several new and improved programs related to vegetation management on the TSF. In particular, they commissioned an examination of vegetation and erosion to provide guidance on addressing findings regarding alien vegetation on the Amandelbult TSF and ensuring erosion risks and dust are adequately managed.

A visit to the facility and discussion with responsible personnel showed that relevant personnel were familiar with and able to enunciate key issues related to native and invasive species, erosion, dust control and slope stability, and that activities to improve vegetation control were ongoing.

Engineering interventions, such as remining inactive dams, are underway in 2026 to reduce structural failure risks.

Chapter 4.2—Water Management

Chapter 4.2 was partially audited during the surveillance audit. Auditing was focused primarily on ten requirements from this chapter, including two critical requirements which were rated Substantially Meets at the initial audit (4.24.1, 4.2.4.4) and on corrective actions from the previous assessment, including site visits to the tailings storage facility. Progress on critical requirements is summarized in Section 3.5.

The Adaptive Water Management Plan (AWMP) was finalized and approved in 2025. It now includes mitigations related to major flooding. The next round of revisions will be to accommodate the latest water license changes from a quantity standpoint.

At the initial audit, the updated Trigger Action Response Plan (TARP) had just been formally approved. As a result, the effectiveness of the TARP was marked for further review during the surveillance audit. However, the mine experienced a major flood in Feb 2025, due to an extreme weather event, changing the focus of this audit. During this event, a large part of the Tumela shaft flooded and the mine consequently had to manage significant volumes on site, while operations were shut down (including process operations that normally use water). Dewatering of One-shaft could not be stored on site, so was discharged, along with excess from the dams on site. The mine also implemented several level-reduction actions for the return water dam (RWDs) including evaporation sprinklers, and cutting back on external sources of water supply for the concentrator, and focusing on using water from RWD. Mitigations for a similar repeat event have already been made to ensure the mine is better prepared to deal with it.

Amandelbult is seeking an amendment of its water use license to address changing volumes. Overall requirements are difficult to predict based on shaft dewatering, but the mine has (successfully) reduced its reliance on potable water from Valkop. The mine is reviewing the possibility of partnering with a 3rd-party to operate a wastewater treatment plant, treating some discharge to potable standards. Also under consideration is the possibility of an engineered wetland for treatment of discharge.

A site-wide update of the water balance (including hydrogeological and surface water) was completed over 2023/24, driven largely by ground water management needs (dewatering). More instrumentation has been added and is being used to recalibrate models. Water balance is integrated with Holding Dam/Return Water Dam (RWD) operation.

The 2025 water efficiency target was not met, despite various improvement actions, but there had been no adjustment for consequences of the February 2025 flood.

Chapter 4.3—Air Quality

Chapter 4.3 was partially audited during the surveillance audit. Auditing was focused primarily on two requirements from this chapter, including critical requirement 4.3.2.1, which was rated Substantially Meets at the initial audit. Progress on this critical requirement is summarized in Section 3.5.

Evidence reviewed during the surveillance audit confirmed that the site continues to implement its Air Quality Management Plan and maintain compliance with the National Dust Control Regulations. For 2025, monthly reports from January through November were

examined, showing PM10 concentrations consistently below 75 µg/m³ and PM2.5 below 40 µg/m³. Blasting reports for the same period documented monitoring of CO, NO_2, SO_2, H_2S, and particulate matter, with no significant exceedances recorded during normal operations. Since the initial audit, improvements include the installation of four fixed ambient monitoring stations in November 2024 and integration of real-time data into monthly reporting, providing enhanced visibility of blasting emissions and particulate matter trends.

The Air Quality Monitoring Procedure was revised to Version 2.0 in September 2024 to align with updated compliance requirements under the National Environmental Management: Air Quality Act and National Dust Control Regulations. This revision introduced provisions for integrating monitoring data into quarterly Safety, Health and Environment (SHE) Steering Committee reviews and Environmental Management System (EMS) reports. Enhanced dust fallout monitoring was implemented from October 2024, including high-risk areas such as Hostel 1 and Tailings Office, which previously recorded non-compliance. Monthly sampling now follows ASTM D1739 standards, and results are benchmarked against regulatory thresholds.

Air Quality personnel continue to be external consultants with subject matter expertise, and monitoring is conducted according to established plans.

Modelling was initially conducted during the Environmental Impact Assessment (EIA)/Environmental Management Program (EMPr) phase, and monitoring stations were established based on receptor locations. Although monthly dust fallout reports include wind direction and rainfall data, they do not meet the full meteorological reporting requirements of the National Dust Control Regulations, specifically with regard to weather parameters obtained from the South African Weather Service. This omission limits the ability to analyze dust dispersion patterns and plan effective mitigation measures. Although real-time meteorological data is now captured by the new monitoring stations installed in November 2024, this information has not yet been integrated into consultant reports, leaving a gap in compliance and trend analysis.

Chapter 4.4—Noise and Vibration

Chapter 4.4 was partially audited during the surveillance audit. Auditing was focused primarily on three requirements from this chapter which did not achieve a Fully Meets rating at the initial audit. There are no critical requirements in this chapter.

Evidence reviewed during the surveillance audit including the Air Quality Monitoring Operational Procedure 2024, and Air Quality Management Plan 2024 confirmed that baseline noise and vibration assessments remain in place, and monitoring continues to comply with legal thresholds for most receptors. Noise measurements taken during the initial assessment in 2016 indicated compliance with 55 dB(A) for daytime and 45 dB(A) for nighttime, except for sensitive receptors near No. 1 Shaft at night. The surveillance audit verified that no significant operational changes have occurred since the baseline study, and initial monitoring and modeling of noise and vibration are still being piloted.

Air blast overpressure and ground vibration continue to be measured, and blasting is scheduled after 17:00 to comply with legal requirements and operational constraints. While the justification for blasting after 17:00 is documented, the supporting procedures do not

clearly outline the criteria used to determine timing, risk assessment steps, or mitigation measures for receptors affected by evening blasting. Predictive modeling to assess potential impacts, particularly for blasts scheduled after 17:00, has not yet been completed, leaving a gap in proactive risk management. The surveillance audit confirmed that no blasting occurs before sunrise and that operational practices align with legal allowances. This was verified through a review of blasting schedules, shift logs, and interviews with operational staff and community representatives. However, the absence of detailed procedural guidance and modeling limits transparency and planning effectiveness.

The revised air quality monitoring procedure from June 2024 introduced provisions for capturing blast fume data and correlating it with environmental conditions. Monthly reports now integrate blast fume data with particulate matter readings, but predictive modeling of acoustic and vibration effects remains incomplete. Calibration of monitoring equipment was confirmed in September 2025, and real-time data is available through the Operational Information system (OIS)platform.

Chapter 4.5—Greenhouse Gas Emissions

Chapter 4.5 was partially audited during the surveillance audit. Auditing was focused primarily on critical requirement 4.5.1.1, which was rated Fully Meets at the initial audit. Evidence reviewed by auditors during the surveillance audit, including the 2024 Group Climate Change Policy, confirmed the prior rating for this critical requirement.

Valterra Platinum continues to uphold its commitment to carbon neutrality by 2040, supported by a comprehensive strategy that includes renewable electricity, low-carbon power sources, methane capture, and energy efficiency initiatives.

In December 2024, a new Anglo American Group-wide Climate Change Policy was launched The 2024 Climate Change Policy remains in effect following the Valterra Platinum demerger. It mandates measurement and reporting of direct, indirect, and product-related emissions, with regular updates provided to stakeholders such as the Board, investors, and host governments. It further requires that external assurance be carried out on Group-level energy and carbon performance reporting. Interviews conducted with supervisors at the Amandelbult operations confirmed their awareness of the carbon neutrality commitment and the ongoing applicability of the Climate Change Policy post-demerger, including continued reporting obligations to relevant stakeholders.

The initial audit noted an absence of explicit references to recognized Greenhouse Gas (GHG) protocols in the site-level standard. During the surveillance audit, the auditor verified that Valterra's GHG emissions calculation methodology aligns with the GHG Protocol Corporate Standard, Scope 2 Guidance, and Scope 3 Accounting and Reporting Standard. Although the site-level Safety & Sustainable Development Group Standard does not cite these protocols directly, consolidated reporting follows widely accepted practices.

The site implemented a number of energy efficiency and emissions reduction initiatives since early 2024. In January 2024, Valterra Platinum initiated an energy efficiency program targeting compressed air systems, BAC (Bulk Air Coolers) fans, and ISA (IsaMill grinding technology) mills, achieving significant energy savings and reducing greenhouse gas emissions. In October 2024, the Dishaba section installed heat pumps in change houses to

replace conventional heating systems. Solar projects were launched in early 2025 to reduce reliance on grid electricity. While these initiatives align with broader sustainability goals.

Compressed air systems, which accounted for approximately 32% of total energy consumption, were prioritized for optimization via compressor load management and pay-weekend shutdowns initiatives. These operational improvements supported a 7.1% reduction in overall energy consumption compared to 2023, despite production challenges caused by flooding events.

Performance data for 2025 indicates energy usage at 1.89 million GJ and GHG emissions at 0.51 million tonnes CO_2e, compared to targets of 2.78 million GJ and 0.87 million tonnes CO_2e. While absolute emissions were below target, intensity metrics remained above desired levels due to lower production volumes.

Chapter 4.6—Biodiversity, Ecological Services and Protected Areas

Chapter 4.6 was partially audited during the surveillance audit. Auditing was focused primarily on three requirements from this chapter, including critical requirement 4.6.2.1, which was rated Fully Meets at the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement.

At the initial audit, the implementation of mitigation measures related to observations from the biodiversity assessment conducted in December 2021 could not be verified. This topic was marked for follow-up at the surveillance audit. At the surveillance audit, the implementation of these measures was verified through multiple sources of evidence, including updated biodiversity monitoring reports, photographic records of rehabilitation activities, and site inspection notes. These confirmed actions such as invasive species control, erosion prevention, and habitat restoration. Based on this evidence, it is concluded that the mine has implemented the required mitigation measures and continues to monitor their effectiveness.

The site continues to engage qualified specialists for biodiversity assessments. An updated baseline biodiversity assessment, covering flora, fauna, and priority ecosystem services, was conducted in 2025. The assessment reports and supporting documentation were reviewed and verified during the audit.

Revised biodiversity management plans have not yet been developed, as current efforts are concentrated on rehabilitation of flood-affected areas and infrastructure recovery following the February 2025 flooding event. Annual monitoring of flora and fauna continues to be undertaken by independent ecologists. Evidence reviewed included the 2024 and 2025 annual biodiversity monitoring reports, which did not indicate reductions in ecosystem conditions.

At the time of the surveillance visit, the mine was preparing an updated version of the Environmental Management Program (EMPr) with a focus on infrastructure decommissioning and closure. However, at the time of the audit, the updated EMPr had not yet been finalized. Evaluation of offsets is pending, and the July 2025 draft assessment report does not include offset strategies.

The mine had implemented new infrastructure rehabilitation projects under the Valterra Platinum and Tumela Upper Asset Disposal and Rehabilitation programs. These initiatives focused on dismantling mining infrastructure, reclaiming materials, and rehabilitating land to meet the July 2025 Draft Environmental Management Plan requirements. Completed works included the 36 West Footwall and 7 East Complex, where infrastructure was removed and land rehabilitation commenced. Additional projects addressed ventilation fans and incline shafts, with shaft sealing and surface restoration activities completed.

Ongoing projects include the 28 West Raisebore and Footwall, 10 West Raisebore, and Merensky Plant, where cable reclamation and demolition are in progress. These efforts aim to restore vegetation and stabilize soil, reducing environmental impact. A five-year plan established in July 2025 is typically referred to as the Mine Rehabilitation and Biodiversity Conservation Plan (or similar wording depending on the mine's internal documentation). This plan outlined actions for progressive rehabilitation, infrastructure decommissioning, and vegetation restoration to support long-term biodiversity goals.

Chapter 4.7—Cyanide Management

Chapter 4.7 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue to not be applicable at the mine.

Because cyanide is not used in any of the mine's ore processing activities, this chapter is considered not relevant.

Chapter 4.8—Mercury Management

Chapter 4.8 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue to not be applicable at the mine.

Because the mine does not use thermal processes to treat any material containing mercury, this chapter is considered not relevant.

5. 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 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.

During the surveillance audit, the current status of critical requirements was reviewed by auditors. This review included assessing progress of corrective actions for all critical requirements that were not fully met as well as changes to site operations that impact the performance of all critical requirements.

A snapshot of achievement against the critical requirements, as determined by the audit firm during the prior assessment and this surveillance audit, is provided below. More information can be found in the corrective action plan progress assessment described in Section 3.5 and the outstanding gaps described in Section 6.1.

5.1 Summary of Site Performance Changes in Critical Requirements

Table 5-1. Review of Ratings for Each Critical Requirement

Principle 1: Business Integrity

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
1.1.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
1.2.2.2.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
1.3.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
1.3.2.1.	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
1.3.3.3.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
1.4.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.5.5.1.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.

Principle 2: Planning for Positive Legacies

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
2.1.3.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.2.2.2	Not Relevant	Not Relevant	Evidence reviewed in this assessment confirms the previous rating.
2.4.7.1	Not Relevant	Not Relevant	Evidence reviewed in this assessment confirms the previous rating.
2.5.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.5.2.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
2.6.2.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
2.6.2.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Principle 3: Social Responsibility

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
3.1.2.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
3.1.3.3	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
3.1.5.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
3.1.7.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.3	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
3.2.4.1.a, b	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
3.3.1.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
3.4.2.1	Not Relevant	Not Relevant	Evidence reviewed in this assessment confirms the previous rating.
3.5.1.2	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.

Principle 4: Environmental Responsibility

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
4.1.4.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
4.1.5.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
4.1.5.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.8.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.2.4.1.a-e	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
4.2.4.4	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
4.3.2.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
4.5.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.4.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.4	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.7.7.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.2	Not Relevant	Not Relevant	This critical requirement is not applicable.

6. Next Steps

6.1 Corrective Action Plans

The following critical requirements were reviewed during the surveillance audit to assess progress on corrective actions proposed following the initial audit. These requirements, along with the initial audit findings, the proposed corrective action, and the outcome of this audit, are summarized in Section 3.5 of this report.

The summaries below represent the performance gaps that remain for these requirements to be fully met according to IRMA guidance. Per IRMA protocols, one of the criteria that must be met for the site to maintain their current achievement level is to successfully complete these corrective actions and be verified as fully meeting the requirement at the time of the renewal audit, which must be completed within 36 months of the publication of the initial audit.

Principle 1 Outstanding Corrective Action

Critical requirement 1.1.1.1. – Compliance with Host Country Laws

While Amandelbult has made progress on the implementation of actions from its Water Contamination Action Plan, not all engineering-related actions have been completed at the time of the surveillance audit. Further verification will be required at the next audit.

Critical requirement 1.2.2.2. - Engagement Processes

Amandelbult has updated its engagement process since the initial audit, and some positive feedback on the changes was noted during external interviews. However, further engagement with a broad range of stakeholders will be needed to demonstrate the effectiveness of engagement mechanisms.

Critical requirement 1.3.3.3. - Prevention, Mitigation and Remediation of Human Rights Impacts

Amandelbult implemented several campaigns to increase awareness of bullying and harassment and implemented training for workers and introduced training on right to freedom of association. This was confirmed by interviewed workers, however, some victimisation and bullying continue to be reported. Further engagement will be needed at the next audit to interview a wider range of workers and verify the effectiveness of the actions.

Critical requirement 1.5.5.1. - Anti-Corruption Measures

The mine strengthened its mandatory anti-corruption compliance training and launched awareness campaigns related to job scams in the community. However, job selling continues to be an endemic issue in the area.

Principle 3 Outstanding Corrective Actions

Critical requirement 3.1.2.1. – Workers' Organizations and Agreements

Amandelbult generally increased awareness among contractors regarding their right to freedom of association, however some contractors still reported being discouraged from joining a union by their employers or being told that this was not allowed.

Critical requirement 3.1.3.3. – Non-Discrimination and Equal Opportunity

The mine has launched several campaigns related to gender-based violence, bullying and harassment since the initial audit, including both direct workers and contractors. However, some interviewed workers still reported instances of victimisation and bullying.

Critical requirement 3.1.5.1. – Grievance Mechanism

Feedback from interviews with workers indicated that the site grievance mechanism still not fully trusted or known by workers. Interviewed employees (both direct workers and contractors) did not always know if complaints they raised had resulted in any investigation or action. Further engagement will be needed to demonstrate the effectiveness of the operational-level grievance mechanism.

Critical requirement 3.2.4.1 - Measures to Protect Workers

The mine has introduced a number of new initiatives and completed its corrective actions related to management of waste and hazardous areas. However, additional observations were noted during the surveillance audit related to access to personal protective equipment (PPE), drinking water quality and safety in the temporary charging area and circuit breakers.

Principle 4 Outstanding Corrective Actions

Critical requirement 4.1.5.1. - Mitigation of Risks and Management of Mine Waste Management Facilities

The mine commissioned an examination of vegetation and erosion on the Amandelbult Tailings Storage Facility to verify if erosion risks and dust are adequately managed. Activities to improve risk mitigation were ongoing at the site of the audit and should be further reviewed during future assessments.

Critical requirement 4.2.4.1. - Monitoring and Adaptive Management

The mine has updated its water use license (WUL) in 2023. It was reported that further updates were being sought in order to address the issue of ambient water quality not meeting some of the required limits, and to address changing volumes. Progress should be reviewed during future assessments.

6.2 Timing of Future Audits

In the IRMA system, a surveillance audit is a mid-point between full audits. The next required activity will be a renewal audit, which must be completed within 36 months of the publication date for the previous full audit.

6.3 Focus Areas for Next Audit

During the surveillance audit, progress was noted in addressing previously identified corrective actions. However, several gaps remain, particularly in relation to grievance mechanisms, contractor management and provision of safe drinking water and personal protective equipment.

As noted, a future focus for the next audit includes compliance with requirements 3.1.2.1 with respect to “freedom of association and collective bargaining” for both the operating company and supplier / contract employers alike. Cross-cutting considerations may also include Chapter 1.1 Legal Compliance.

The updates to the site procedures on transportation and storage of hazardous materials with focus on risks to community health and safety will be reviewed at the next onsite audit. The scope of the audit should also cover the updates to the Environmental Management Program (EMPr) related to decommissioning and closure, and any revisions to biodiversity management plans based on the 2025 baseline biodiversity assessment.

To verify effectiveness of Business Integrity systems in practice, support closure of outstanding corrective actions, and inform any re-rating at renewal audit should focus on specific areas for external stakeholder engagement, including:

- Effectiveness of human rights commitments in practice, with particular attention to bullying, harassment, victimisation and GBV, and differential experience between employees and contractors (Chapter 1.3).
- Contractor management and business partner conduct, including perceptions of fairness, non-discrimination and site oversight of contractor supervisors (Chapters 1.3 and 3.1).
- Awareness, accessibility and trust in grievance mechanisms, including anonymous channels and feedback on outcomes, particularly among contractor workers (Chapter 1.4).
- Freedom of association and absence of intimidation, with emphasis on contractor workers’ ability to exercise labour rights without fear of reprisal (Chapter 3.1).
- Perceptions of corruption-related risks, including job-selling and transparency in recruitment, contracting and reporting mechanisms (Chapter 1.5).
- Effectiveness of feedback loops and accountability, including whether stakeholder concerns result in observable corrective action (Chapter 1.2).
- Continuity and clarity of governance following the transition to Valterra Platinum, including understanding of current policies, standards and escalation pathways (Chapter 1.1).

- Engagement with the farmer or relevant representatives of the completed 35-hectare rehabilitated site area that is now being farmed to confirm success of land use change (Chapter 2.6)

These topics will be considered priority focus areas at the next renewal audit, where the audit team will evaluate both the completion of outstanding corrective actions and the effectiveness of measures taken to address identified gaps.

In addition to this, focus areas for future audits will include pending changes, follow-up on initiatives and areas of potential risk.

In addition to assessing the status of open corrective actions, focus areas for future audits will include pending changes, follow-up on initiatives and areas of potential risk.

Appendix A: Revised Corrective Action Plan

The following plan was authored by the mining company in response to this Surveillance Audit.

Requirement	Next Steps
1.1.1.1. The operating company shall comply with all applicable host country laws in relation to the mining project.	Water and WUL: See 4.2.4.1 Overdue issues: Continue reporting on overdue compliance actions and addressing non-conformances with actions to complete by due date.
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	1. Continue with implementation of stakeholder engagement activities as per the Stakeholder Engagement Plan, i.e.: a. Provide relevant information to stakeholders in a timely manner; b. Include participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engage in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Solicit feedback from stakeholders on issues relevant to them; and e. Provide stakeholders with feedback on how the company has taken their input into account
1.3.3.3. Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall:	1. Continued implementation of BHV/GBV trainings and awareness raising targeting employees, contractors, and communities. 2. Conduct awareness raising with contractors on Social Performance minimum requirements, including human rights considerations

Requirement	Next Steps
i. Cease or change the activity responsible for the impact; and 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; 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; 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.	
1.5.5.1. The operating company shall develop, document, and implement policies and procedures that prohibit	1. Mandatory Business integrity trainings for all the employees and business partners

Requirement	Next Steps
bribery and other forms of corruption by employees and contractors.	2. Conduct awareness raising on corruption and job scams with communities
3.1.2.1. The operating company shall respect the rights of workers to freedom of association and collective bargaining	Strengthen the minimum social performance requirements for contractors, i.e. labour laws compliance needs to be expanded to stipulate specific areas such as minimum wage, freedom of association, working hours and leave, etc. Continue with contractor workshops raising awareness on human rights impacts, including collective bargaining (Induction, Supplier Open Day, LAF, and WiM Seminar)
3.1.3.3. The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially regarding female workers.	1. Continued implementation of BHV/GBV trainings and awareness raising targeting employees, contractors, and communities. 2. Conduct awareness raising with contractors on Social Performance minimum requirements, including human rights considerations 3. Strengthen the minimum social performance requirements for contractors, i.e. labour laws compliance needs to be expanded to stipulate specific areas such as minimum wage, freedom of association, working hours and leave, human rights, etc.
3.1.5.1. The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum: 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; b. Shall allow for anonymous complaints to be raised and addressed; c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and Shall not impede access to other judicial or administrative remedies that	1. Strengthen the awareness raising on the operational grievance mechanism for workers and contractors. 2. Review and update the internal (workers) grievance procedure to ensure appropriate consideration of anonymous grievances and contractor employees.

Requirement	Next Steps
might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.	
3.2.4.1. The operating company shall implement measures to protect the safety and health of workers including: a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; 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; 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; 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; e. Providing adequate supervision and control on each shift; and If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.	1. Ensure that all compressed gas cylinders across the operation are properly secured in line with the Storage, Transportation, And Spill Clean-Up Of Hazardous Substance Procedure.
4.1.5.1. Mine waste facility design and mitigation of identified risks shall be consistent with best available	1. Continue with the implementation of mitigation measures for erosion risks and dust in consideration of findings regarding alien vegetation for the AMB TSFs.

Requirement	Next Steps
technologies (BAT) and best available/applicable practices (BAP).	
4.2.4.1. 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: 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). b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics. c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics. d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities. e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables	1. Implement engineered wetlands at three (3) discharge points 2. Continue WUL amendment process and document progress 3. Continue implementation of the prioritized actions from the Water Contamination Action Plan 4. Maintain monthly water quality and quantity monitoring and implement corrective actions for non-compliances

[1] [v] IRMA website: “Complaints and Feedback.” https://responsiblemining.net/what-you-can-do/complaints-and-feedback/

[2] [vi] IRMA Issues Resolution System Procedure. Verson 1.0. January 2020. https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf