

# **IRMA SURVEILLANCE ASSESSMENT PUBLIC REPORT**

MINE SITE

Kolomela

OPERATING COMPANY

Anglo American

COUNTRY OF OPERATION

South Africa

13 MARCH 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 participation, and willingly give their time to provide perspectives and information on mine site performance. IRMA would like to recognize Anglo American Kolomela and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

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# Audit Details

<b>Name of Mine:</b>	Anglo American Kolomela
<b>Operating Company:</b>	Kumba Iron Ore
<b>Mine Owner:</b>	Anglo American
<b>Country of Operation:</b>	South Africa
<b>Mined Material(s):</b>	Iron Ore
<b># Employees / contractors:</b>	1,007 employees and 1,401 contractors at the time of audit
<b>IRMA Audit Page:</b>	<a href="https://responsiblemining.net/Kolomela">https://responsiblemining.net/Kolomela</a>
<b>Audit Type:</b>	Surveillance Audit
<b>Audit Dates:</b>	Desktop review: 8 July 2025, 13-14 October 2025 Onsite audit: 20-21 October 2025
<b>Audit Firm:</b>	ERM CVS
<b>Audit Team:</b>	Lead/EHS Assessor (1) EHS Assessor (1) Social Assessor (1) Social Support/Translator (2)
<b>Audit Firm Declaration:</b>	<p>✓ 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.</p> <p>✓ The audit team members were deemed to have no conflicts of interest with the mine.</p> <p>✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities.</p> <p>✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p>
<b>Scope of Audit</b>	Kolomela operations and facilities, including an open pit mine, crusher, tailings storage facilities, waste rock disposal areas and ancillary infrastructure.
<b>IRMA Standard Version:</b>	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
<b>IRMA Achievement Level:</b>	IRMA 75
<b>Achievement Decision:</b>	26 March 2024
<b>Achievement Expiration:</b>	26 March 2027
<b>Authorized Representative:</b>	Glenn Keays, ERM CVS, Director, Operations (Mining)
<b>Representative Signature</b>	
<b>IRMA Reference Number:</b>	IRMA-00150-STD01.0-01-SRV OLD: IRMA-STD-ERM-001-V-3448.IRMA1

# 1. Mine Site Overview

## 1.1. Overview of location

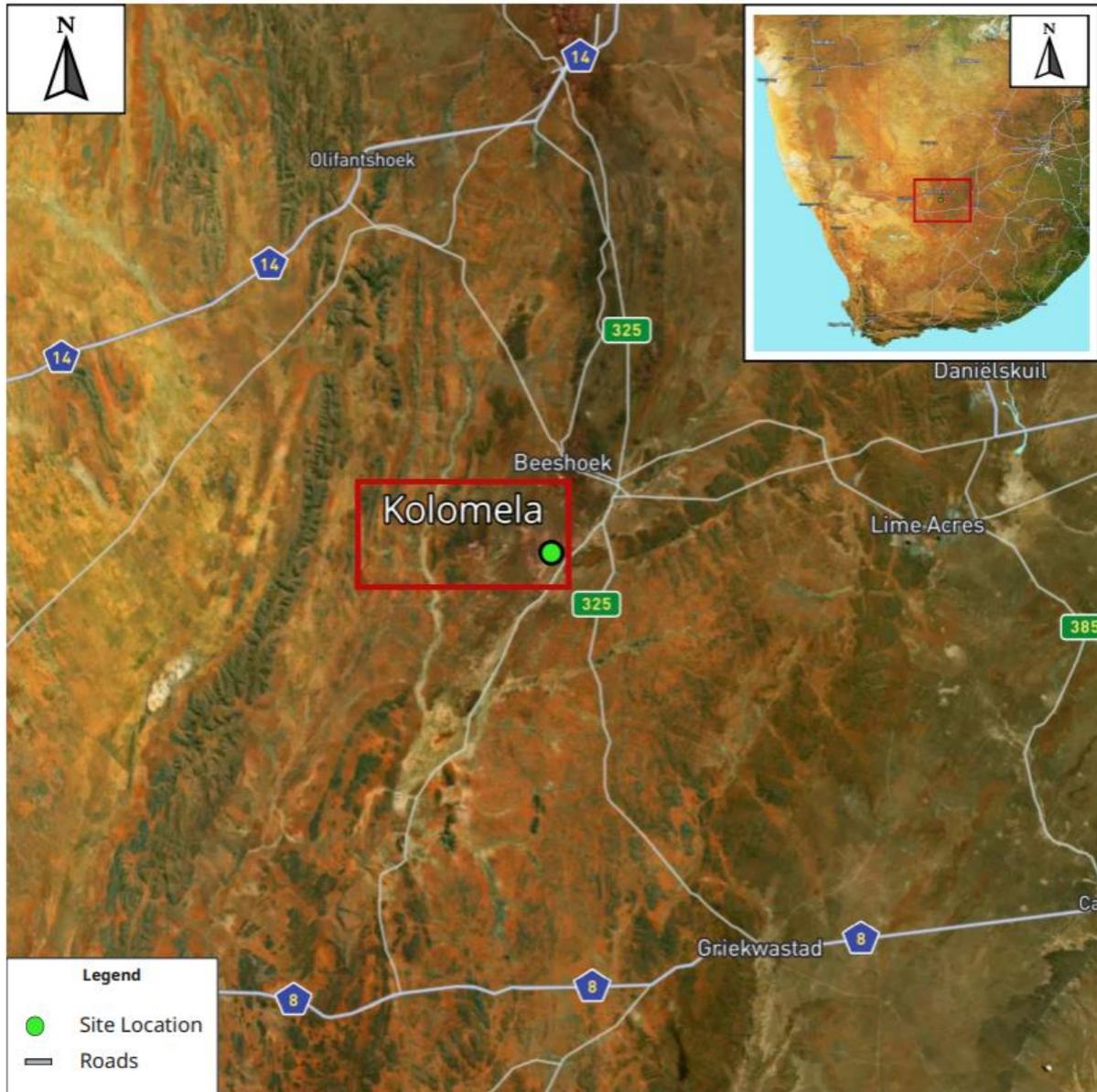


Figure 1: General location of mine site

The Anglo American Kolomela Mine is situated in the Tsantsabane Local Municipality, within the ZF Mgcawu District Municipality of the Northern Cape Province, South Africa. The town of Postmasburg is 10 km northeast of the Mine, with a population of 30,089 in 2011. Smaller communities close to

the Mine include Jenn-Haven and Metsimatala, both approximately 30 km northeast of the Mine., and smaller rural settlements.

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

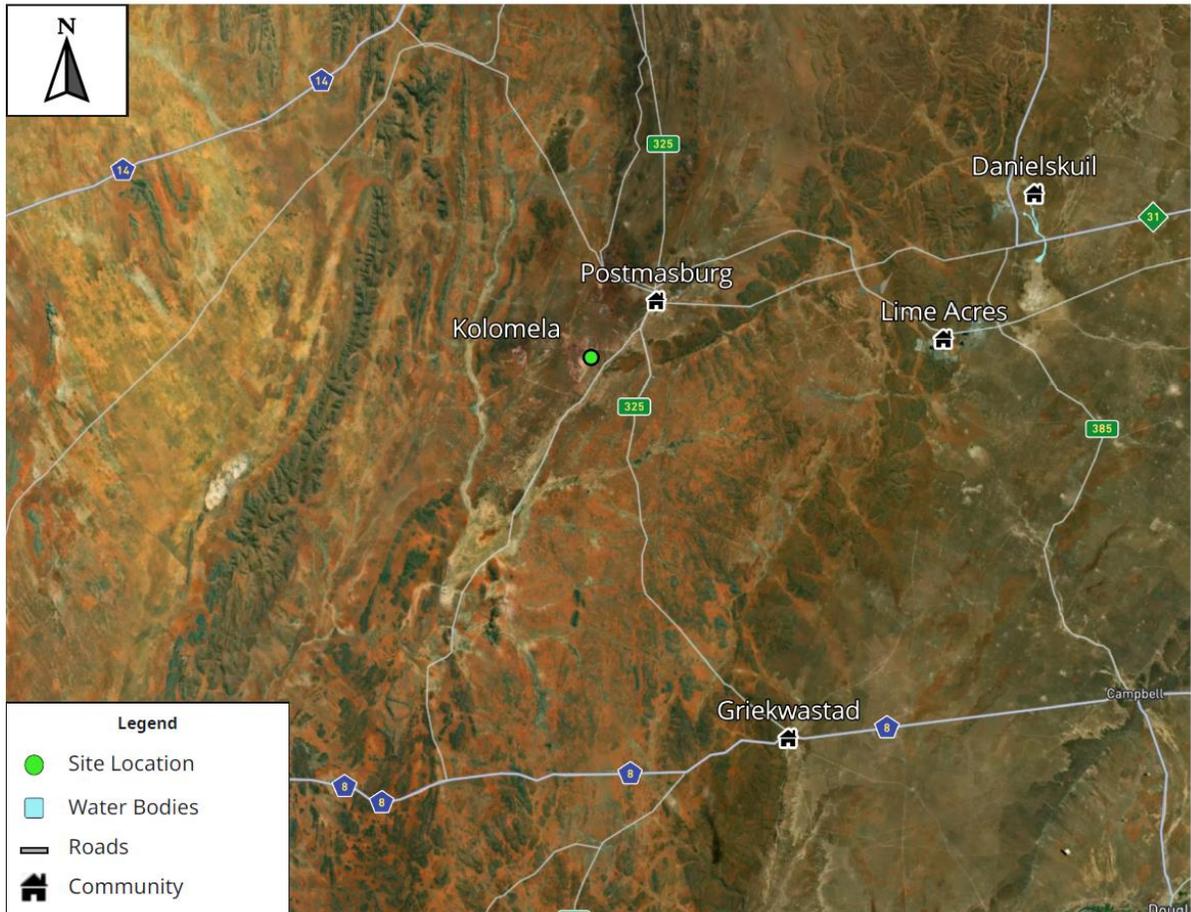


Figure 2: Regional Location of Site

The Kolomela Mine falls within the Kuruman Mountain Bushveld and the Postmasburg Thornveld. The site is located in the Orange River Primary Drainage Region. The general area is considered flat, with a few ephemeral rivers traversing the mining boundary. The main streams in the vicinity of the mine are the Groenwaterspruit which flows along the eastern boundary of the mine. Tributaries of the Soutloop River flow from the northeast to southwestern sections of the mining area forming which is locally referred to as the Welgevondenspruit. A tributary of the Soutloop River also flows from north to south through the Mine Boundary. The Mine is surrounded by agricultural land and land used for game farming. Livestock farming and

crop production are mostly concentrated along irrigated areas by the Orange River. Figure 2 provides a regional map of the mine site location.

The geohydrological regime for the Kolomela Mine is made up of two main aquifer systems. The first, the upper, unconfined to semi-confined aquifer occurs in the calcrete that cover most of the surface area of Kolomela. Although relative low yields occur in this aquifer, it is developed widely throughout most of the region and is used by most of the farms in the area. The second aquifer is within the consolidated bedrock.

The province has a semi-arid climate, with annual rainfall averaging 250-400 mm, mostly during summer months. Historically, the economy in the region has relied on livestock farming and small-scale agriculture, however the development of mining operations has transformed the area into a mining hub and brought upgrades in infrastructure, housing and local services. Mining is the dominant sector, contributing to around 20-25% of provincial GDP.

## 1.2. Overview of operation

The Kolomela Iron Ore mine is operated by Sishen Iron Ore Company (SIOC), a subsidiary of the Anglo American group, Kumba Iron Ore. The mine was initially developed as part of the Sishen South Project and was completed in mid-2011. First production began in late 2011.

Kolomela is an open-pit operation that employs conventional truck-and-shovel mining methods. The ore consists of high-grade hematite, and the mine produces approximately 10 million tonnes of iron ore annually. There are currently four opencast pits, Leeuwfontein, Klipbankfontein, Kapstevél North, and Kapstevél South. First ore from the Kapstevél South Pit was delivered in 2024.

The mine is a predominantly direct shipping ore (DSO) operation with a crushing and screening plant treating high-grade run-of-mine. Ore is blended and stockpiled using a stacker-reclaimer system and loaded onto a railway line, operated by a third-party and connected to the Port of Saldanha, from where the iron ore is exported. Ex-pit ore is hauled to designated finger stockpiles from which a run-of-mine blend is delivered.

Kolomela had a small-scale Dense Media Separation (DMS) facility to treat Low grade ore. Operation of the facility was suspended in 2023.

In 2024, Kumba underwent reorganization and optimization of its operations and reduction of mining volumes and production.

Figure 3 presents the physical configuration of site operations.



Figure 3: Layout of Site Operations

### 1.2.1. Scope of activities and facilities included in audit

The operations and activities in scope for Anglo American Kolomela Iron Ore IRMA participation include:

Mining operations:

- Open pits: Leeuwfontein, Klipbankfontein, Kapstevl North Pit, Kapstevl South Pit

Processing operations:

- Dense media separation (DMS) plant (Non-operational)
- Direct Shipping Ore (DSO) Plant including crushers
- Ore stockpiles
- Conveyors

- Waste areas, including waste rock dumps, waste management facilities
- Tailings Storage facility
- Maintenance and storage facilities
- Administration, offices and workshops
- Magazine explosives

### 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

Travel delays and challenges with availability of worker interviewees required the team to adapt the audit plan in order to complete all scheduled interviews, reviews and on-site visits. Some of the worker interviews, particularly groups, did not include hoped-for numbers or breakdown of status/roles/gender. Specifically, while auditors interviewed an adequate cross-section of direct employees and contractors individually, an additional group of male operational direct employees could have been included.

Due to time constraints, the team did not visit crush/convey operations during the surveillance audit. The nature of a short-duration surveillance audit necessarily means that only a small sample of work areas and processes can be visited. Nevertheless, the lack of an active beneficiation plant and the size of the site allowed the audit team to observe a sufficiently large sample of operational activities to accomplish the aims of the surveillance audit.

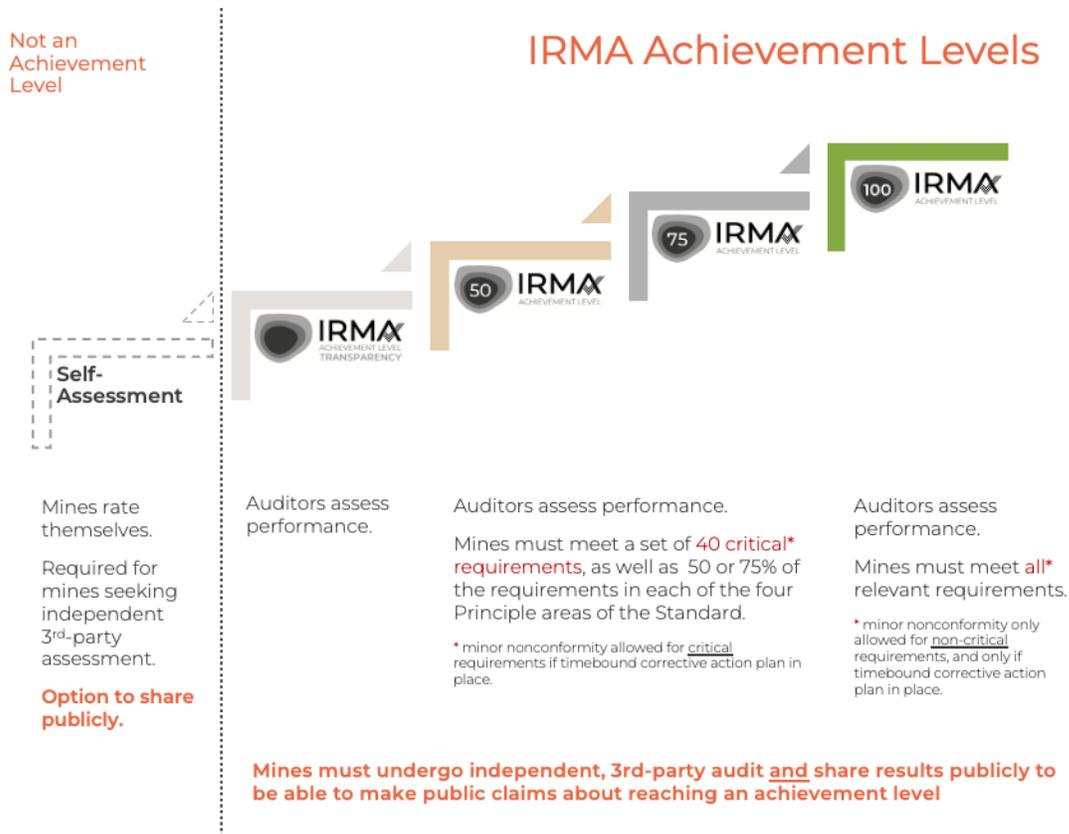
With some of the external stakeholders requesting participation in the surveillance audit a few weeks or days prior, the social auditor was able to engage with all of those who expressed interest, even if not face-to-face. As is typical in an audit process, for a variety of reasons, some participants (government officials in particular) did not attend planned engagement sessions and alternate arrangements needed to be made when possible.

## 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. 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. 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, docume

tation 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.

### 2.3.1. Written comments/inquiries

No formal or informal comments were received from stakeholders between the initial audit and the surveillance audit.

Thirty days prior to the onsite surveillance visit, the assessment was announced on the ERM CVS website, IRMA's website, 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 Anglo American Kolomela 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, Setswana and Afrikaans.

To inform stakeholders about the audit, Anglo American 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.

The surveillance audit announcement process did not result in any stated interest in participating in the Kolomela audit. During execution of the draft surveillance audit stakeholder engagement plan the social auditor worked with the Mine to facilitate participation by selected stakeholders. The ten (10) interviewees represent a cross-section of stakeholders from the Mine's area of influence that included faith-based leaders, non-profit organization representatives, youth and community activists, environmental and agricultural forum representatives and a traditional authority chief. These interviews are identified in Section 2.3.4 below.

### 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.

### 2.3.3. Workers/Contractors

Position/Role
Principal Mineral Rights and Permitting
Principal Risk and Assurance
Specialist Mineral Rights & Permitting
Compliance and Assurance Advisor
Permitting Practitioner
Specialist Risk & Compliance
Specialist Risk & Compliance
Specialist Mineral Rights & Permitting
Principal: Stakeholder Engagement
Community Liaison Officer
Manager: Corporate Affairs
Community Liaison Officer
Section Manager: Fire Prevention

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Environmental Advisor

---

Section Manager: Environment

---

Section Manager Hygiene

---

Section Manager: Safety

---

Principal: Health and Hygiene

---

Sustainability Integration and LADAR advisor

---

Specialist: Safety and Risk

---

Section Manager Occupational Medicine

---

Principal Employee Relations

---

Principal Talent and Org Effectiveness

---

ER Advisor

---

Specialist Social Risk & Impact

---

Section Manager Security

---

Section Manager Security

---

Principal Security & Intelligence

---

Specialist: Socio-Economic Development

---

Specialist Carbon Neutrality & Energy

---

Social Governance Standards & Assurance

---

Principal Environment and Land Management

---

Specialist: Sustainability Integration

---

Environmental Advisor

---

Principal: Sustainability Reporting and Disclosure

---

Principal, Sustainability Relations

---

Section Manager Drill & Blast

---

Section Manager - Block Pre & Constructions

---

Specialist: Social Performance

---

Principal: Social Impact and Sustainability

---

Specialist: Community Liaison

---

---

Section Engineering Manager

---

RRT Supervisor

---

Business Partner Supervisor

---

Specialist: Sustainability Integration

---

Principal SIB Studies

---

Specialist: Social Impact and Sustainability

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During the surveillance audit, ERM CVS conducted a total of 16 scheduled worker engagements, including 11 individual interviews, and 5 group interviews (3-4 people). Interviews included a total of 30 workers. Additionally, three representatives from local unions (NUM- National Union of Mine Workers, AMCU- Association of Mineworkers and Construction Union, NUMSA-National Union of Metalworkers of South Africa) were interviewed.

Scheduled worker interviews were supplemented by 10 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, 43 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 1,007 direct employees and 1,401 contractors (total 2,408 workers). The selection aimed to ensure diversity in age, gender, length of service at the Kolomela 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, topics discussed included the work environment, the freedom to associate, the adequacy of safety systems and Personal Protective Equipment (PPE), the effectiveness of grievance mechanisms and pay and benefits. The engagements took place onsite in designated conference rooms and offices. The worked interviews were conducted without Anglo American management personnel present. Participants for group interviews were selected by ERM CVS to avoid bias or

influence employee responses. Worker interviews suggest a similar dynamic that existed during the initial audit still exists, where contracted workers are typically not unionized. While direct employees and contracted workers agree that mine safety systems are functioning well, some contract workers continue to highlight that PPE may not be replaced by their employers consistently and free of charge. Compensation is made on time, but contracted worker benefits are lower for similar work performed by an employee. Contract workers also indicate a lower inclination to utilize available grievance mechanisms.

Date	Meeting Type	Attendees	Notes
20 October 2025	Individual Interview	1F	Contractor, Non-mining
20 October 2025	Individual Interview	1F	Contractor
20 October 2025	Individual Interview	1M	Direct employee, Processing
20 October 2025	Individual Interview	1M	Direct employee, Processing
20 October 2025	Individual Interview	1M	Direct employee, Operator
20 October 2025	Individual Interview	1M	Union Representative
20 October 2025	Individual Interview	1M	Union Representative
20 October 2025	Individual Interview	1M	Union Representative
20 October 2025	Group interview	4M	Direct employees in various areas: Engineering, Operators
20 October 2025	Group interview	1F, 3M	Direct employees, Processing, Operators, Supervisor
21 October 2025	Individual Interview	1F	Contractor, Non-mining
21 October 2025	Individual Interview	1F	Contractor, Non-mining
21 October 2025	Individual Interview	1F	Direct, Engineering
21 October 2025	Individual Interview	1F	Contractor, Engineering
21 October 2025	Individual Interview	1F	Contractor, Engineering
21 October 2025	Individual Interview	1F	Contractor, Non-mining
21 October 2025	Group interview	3F	Contractors, General workers
21 October 2025	Group interview	4M	Contractors, General workers

21 October 2025	Group interview	4F	Contractors, Non-mining
20-21 October 2025	Impromptu interviews	10	Conducted during site walkarounds in various areas
Total	43 workers: <ul style="list-style-type: none"> <li>33 scheduled workers (16F, 17M)</li> <li>10 impromptu interviews</li> </ul>		

### 2.3.4. Government Agencies and Non-Governmental Organizations

The perspectives of local government officials and non-governmental organization (NGO) representatives are a valuable window into how the mine interacts with and benefits its stakeholders. Due to availability constraints, requested interviews and engagement with the Tsantsabane Local Municipality disaster management coordinator, and the local Labour Desk, a municipal office that helps coordinate employment applications at the Kolomela Mine was arranged but did not occur during the surveillance audit period. Similarly, a planned meeting with a Tsantsabane Local Municipality councilor was arranged but did not occur due to stakeholder unavailability to attend the interview. These constraints were addressed during discussions with local NGO representatives listed below and specifically in relation to progress made on Social Labour Plan (SLP) projects, as well as other identified priorities not adequately covered in the SLP, including gaps in urban infrastructure and services for rural residents.

Engagement with the asserted leadership of the Groenwater community and the Griqua Peoples (Korana First Nation), which was identified for follow-up in the initial audit, was conducted via a conference call and in-person meeting as part of the Kumba Iron Ore Sishen Mine audit.

Date	Community, NGO Name	Location of Meeting	Attendees
20 October 2025	Environmental Forum representative	Postmasburg area church	1M
20 October 2025	Traditional chief and rural community representative	Postmasburg area church	1M
20 October 2025	Local Non-Profit Organization / Prayer	Postmasburg area church	1M

Date	Community, NGO Name	Location of Meeting	Attendees
	Group representatives (voluntary program for families)		
20 October 2025	Local Agricultural Environmental Forum / Water Use Association representative	Postmasburg area church	1M
21 October 2025	Pastor	Postmasburg area church	1M
21 October 2025	Non-profit organization representatives (voluntary program for youth)	Postmasburg area church	2F
21 October 2025	Community Property Association representatives	Postmasburg area church	3M
<b>Total</b>			<b>10 (2F, 8M)</b>

## 2.4. Summary of Mine Facilities Visited

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

Operational areas	<ul style="list-style-type: none"> <li>Kolomela Mine Kapstevl South Pit</li> <li>Kolomela Heavy Vehicle Machine Workshop</li> <li>Kolomela Heavy Vehicle Machine Shop (OHV)</li> <li>Control Centre / Fatigue Management Centre</li> <li>Waste Management Facility</li> </ul>
Non-operational areas visited	<ul style="list-style-type: none"> <li>Medical Centre</li> <li>Injury Rehabilitation and Wellness Centre</li> <li>Training Centre</li> </ul>
Surrounding Communities	<p>External engagement meetings were held in a church in Postmasburg, chosen for its accessibility for interviewed stakeholders. Union representatives agreed to be interviewed in a meeting room on the Kolomela Mine site.</p>

## 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

An external compliance audit was conducted between late 2023 and April 2024 to evaluate Kolomela Mine's adherence to host country legal requirements and critical standards. The audit reviewed compliance tracking systems, permits, licenses, and operational notices, as well as internal and external legal audits. During this process, the review of the "Anglo American – Kumba – Legal Requirements" register identified missing regulatory requirements. Corrective actions were initiated immediately, and most related actions have since been completed. Evidence supporting compliance includes documented licenses and permits, inspection reports, enforcement actions, and a compliance matrix updated over time.

Following the audit, Anglo American introduced an integrated permitting standard in April 2024 to strengthen governance and streamline compliance processes across operations. This standard addresses previously identified gaps and ensures alignment with regulatory requirements. Kolomela Mine expects to achieve full compliance with this standard by the end of 2027.

#### 3.1.2. Regulatory inspections, violations, enforcement actions

Kolomela Mine completed an independent regulatory audit in April 2024. The mine receives regular visits from South Africa's Department of Mineral Resources and Energy (DMRE). In 2024, Kolomela received 5 major non-conformances from DMRE, including Sections 54 and 55 notices.

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

As of the dates of the surveillance audit, in October 2025, there are no specific lawsuits or non-regulatory actions currently reported as being directly filed against the Kolomela Mine itself.

### 3.1.4. Summary of major events, health/ safety incidents, and performance records

A drilling assistant was fatally injured at Kolomela Mine on February 13, 2023. The incident was the first fatality at the mine in over six years. The response at Kolomela and other Kumba Iron Ore mines included implementing new safety measures, such as greater supervisory oversight and improved equipment design to prevent future fatalities. The mine otherwise maintained a positive safety record, with Lost Time Injury Frequency Rate (**LTIFR**) improving from 0.66 in 2023 to 0.36 in 2024. Reductions were also noted in first aid and medical treatment cases.

## 3.2. Stakeholder feedback/complaints since prior audit

### 3.2.1. Stakeholder feedback/complaints received by site

No formal stakeholder feedback or complaints were received by the mine with respect to the initial audit process.

### 3.2.2. Stakeholder feedback/complaints received by auditors or IRMA

No stakeholder feedback was received by the auditors following the initial audit or prior to the surveillance audit.

## 3.3. Summary of Material Operational or Administrative Changes Since Previous Audit

The following operational/administrative changes have been reported since the initial audit:

- In 2023, operation of the Dense Media Separation (DMS) plant was suspended as part of a cost-saving and business reconfiguration exercise in line with logistical constraints.

- In February 2024, Kumba Iron Ore announced operational reconfigurations to reduce costs and manage logistics constraints. These were primarily focused on reducing production in response to logistics constraints (primarily rail capacity issues with Transnet). This has included managing Sishen and Kolomela as an integrated complex for flexible production and managing stock levels. In 2024, Kumba reduced production profile in line with these changes.
- In March 2024, the mine entered consultation with trade unions. As a result, the National Union of Metalworkers of South Africa received recognition for the members it represents at the 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:

- Effectiveness of grievance mechanism, including actions taken to address feedback from stakeholders and response time. (Requirement 1.4.1.1)
- Engagement with the asserted leadership of the Groenwater community and the Griqua Peoples (inclusive of Korana First Nation) (Chapter 2.2.)
- Effective implementation of the Kumba Iron Ore Adaptive Water Management Standard, Kolomela Mine Adaptive Water Management Plan, and the Integrated Water and Waste Management Plan. (Requirement 4.2.4.4)
- Impact from mining-related activities on noise receptors (Requirement 4.4.2.1)

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 #	1.2.2.2.
Requirement	<p>The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ul style="list-style-type: none"> <li>a. Providing relevant information to stakeholders in a timely manner;</li> <li>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;</li> <li>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;</li> <li>d. Soliciting feedback from stakeholders on issues relevant to them; and</li> <li>e. Providing stakeholders with feedback on how the company has taken their input into account.</li> </ul>
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	<p>The site has in place a Stakeholder Engagement Plan (SEP), which has been updated annually since 2019. The Stakeholder Engagement Plan indicates that:</p> <ul style="list-style-type: none"> <li>a. Regular timely engagement is taking place</li> <li>b. Evidence reviewed showed the management and subject matter expert participation in engagement activities such as the stakeholder day.</li> <li>c. The Stakeholder Engagement Plan demonstrates consideration of engagement methods with different stakeholder groups, language requirements, and respect for stakeholders. For example, the quarterly environmental forum is held in Afrikaans as the surrounding farmers are predominantly Afrikaans speaking. Presentations are translated as needed. During interviews, the site confirmed that engagements are done in different languages. Booklets for Community Boxes are in Setswana, Afrikaans, and English.</li> <li>d. Feedback on engagement outcomes indicates two-way dialog, and the Ulula community surveys demonstrate that the site is soliciting feedback from stakeholders. The site regularly solicites feedback from stakeholders through the Ulula survey and annual community perception surveys. These are provided in different languages. During the stakeholder interviews, some stakeholders reported that they do not know how their feedback is incorporated into socioeconomic development planning and noted that</li> </ul>

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feedback to queries or requests for support on projects or funding is not always provided or provided in a timely manner.

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**Planned Corrective Action(s) from previous report**

Kolomela Mine fosters two-way dialogue and meaningful engagement with stakeholders in a number of ways. Kolomela Mine will look to ensure that feedback from stakeholders and the company are recorded in the minutes of meetings held to ensure that action is undertaken based on stakeholder input, and agreements in terms of point of (d) and (e) with defined timelines. These actions will be captured in our management systems action tracker module.

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**Comments on Progress**

Formal meetings with stakeholders are now consistently documented, including stakeholder feedback/concerns, responses and commitments, and agreed-upon actions with defined responsibilities and timelines, including Stakeholder Day Engagement, Social Labour Plan 4 Consultation process consultations at Kolomela, multi-stakeholder business forum committee (MBFC) meetings.

Progress has been made in maintaining community support through some forums (i.e. the environmental forum being the best example) and regular stakeholder day presentations. A process is now in place to better track, respond and report back on feedback received. However, surveillance audit interviews indicate stakeholders continue to ask for more communication opportunities. Community members interviewed expressed a desire for more inclusive and participatory planning processes, beyond Social and Labour Plan 4 negotiation participants, that identify and implement priority infrastructure projects. Based on the improvements noted, this requirement is rated '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;

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- 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 evidence provided by the Human Rights Due Diligence review is supported by the Social and Human Rights Impact and Risk Analysis review, the Social Performance Report in March 2021, the Socio-Economic Development Stakeholder Day presentation, and the letter to the local business forum, which references the use of a mediator to resolve an ongoing issue. Social Performance Report provides some examples of potential human rights impacts that the company may be contributing to (i.e., shortage of housing due to influx of job seekers and employment creation at the mine) and provides recommended mitigations. Report provides details on stakeholder engagement activities and potential grievances.

Stakeholder Impact Assessment and Perception Report indicate assessment and mitigations included stakeholder consultation. Stakeholder Perception Survey indicates awareness of the Incident and Grievance process. Evidence was provided of the proposed mediated meeting between the operating company and the local business forum. Scope of Work for Human Rights Due Diligence Process update (2022) includes consultation and collaboration with stakeholder groups. Stage 2 onsite interviews did not provide an opportunity to gather additional evidence to better understand cooperation with local municipality and other groups on programs to identify and address mitigate human rights impacts, including disaster management planning.

**Planned Corrective Action(s) from previous report**

Kolomela Mine will look towards improving communication around human rights risks, in line with incidents which may arise from the mine's impact. Practically, this could take the form of case studies, which detail the incident, the action taken, mitigation strategies developed and implemented, and the link towards potential human rights violations. Kolomela Mine will also, where applicable, include the mitigation measures and human right impacts identified in the Social Management Plan.

**Comments on Progress**

The mine highlights implementation of a quarterly Social and human rights impact and risk analysis (SHIRA) process to identify potential risks and findings, which it shares with relevant community representatives during forums and Stakeholder Day presentations.

However, surveillance audit interviews emphasize a gap in communications around human rights risks. A document prepared for Anglo American, "South Africa; Security & Human Rights External Context Assessment" was reviewed. This study may provide the basis for improving risk assessment communications. The rating remains Substantially Meets while this is outstanding. No actual human rights impacts. Given that stakeholders and right holders are not receiving adequate information to participate fully in emergency response discussion this finding will remain Substantially Meets and be reviewed again during the reassessment audit.

**Requirement #** 2.5.1.1.

**Requirement** All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.

**Critical** Yes

**Rating from previous report** Substantially Meets

**Justification from previous report** The site was unable to provide evidence that they have specifically reviewed the guidelines of the UN APELL for Mining. However, corporate and site level documentation does adequately address the guidelines and recommendations.

**Planned Corrective Action(s) from previous report** Kolomela Mine will update the Emergency Preparedness and Response Plan, and emergency procedures to include the suggested content or equivalents for the UN APELL for Mining.

**Comments on Progress** The Emergency Preparedness and Response Plan was updated in September 2025 to align with the UN APELL 10-step guidelines, following a gap analysis and internal consultations. The plan now includes clear roles, trigger action plans, and integration with other site procedures. This requirement is now rated Fully Meets.

**Requirement #** 2.6.4.1.

**Requirement** Financial surety instruments shall be in place for mine closure and post-closure.

<b>Critical</b>	<b>Yes</b>
Rating from previous report	Substantially meets
Justification from previous report	<p>The mine's closure plan is updated every 3 years. The closure cost liability is updated annually and is independently reviewed by PwC annually. The closure costing has been signed off and approved by financial management, and financial guarantees are in place and have been submitted to the authorities.</p> <p>In a letter to the Regional Manager of the Department of Mineral Resources and Energy, Kumba Iron Ore Limited reported the latest estimated closure cost, the amount in a trust fund, bank guarantees and the shortfall against the estimated closure cost. The letter goes on to state that Sishen Iron Ore Company (PTY) Ltd, the holder of a mining right under which it operates Kolomela Mine, is in the process of addressing the identified shortfall by securing a bank guarantee. No additional information was provided to the audit team to confirm the mine's securing of the additional bank guarantee in order to satisfy the shortfall. This requirement will be reviewed during the surveillance assessment, including the status of the shortfall.</p>
Planned Corrective Action(s) from previous report	Pending receipt
Comments on Progress	<p>During the initial IRMA audit, the auditor identified a difference between stated financial provision and financial instruments of guarantees/funds, etc. and interviewed personnel were unable to explain the discrepancy. Subsequent review, by the mine, determined there was no gap. The appearance of such was due to a difference in timing between the update of the rehabilitation plan and implementation of the financial instruments. The most recent guarantees now match the required financial provision, and the mine now fully meets this requirement.</p>
<b>Requirement #</b>	<b>3.1.2.1.</b>
<b>Requirement</b>	The operating company shall respect the rights of workers to freedom of association and collective bargaining.
<b>Critical</b>	<b>Yes</b>

Rating from previous report	Substantially meets
Justification from previous report	Code of Conduct, Recognition Agreements, Contingency Operations Division Agreement, Shop Steward Procedural Agreement, Induction Training screenshot, Grievance  Procedure and dispute form provided. Interviews with managers and employees confirm respect by the operating company for the rights of workers to collectively bargain. Interviews with contracted workers indicate that suppliers may strongly discourage the exercise of workers' right to freedom of association.
Planned Corrective Action(s) from previous report	Pending receipt
Comments on Progress	During the initial IRMA assessment, while these and other concerns were noted and discussed, the related requirements were evaluated based on the mine's performance, as related to direct employees of the mine only. Subsequent to that initial assessment, the related IRMA requirements have been interpreted as applying to all workers. As this could not have been communicated to the mine at the time, the mine was not expected to develop and implement corrective actions. See Section 3.7. for more details. Consequently, the critical requirement related to these issues have not been re-rated at this time and remains rated as Substantially Meets.
<b>Requirement #</b>	<b>3.1.3.3.</b>
Requirement	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.
<b>Critical</b>	<b>Yes</b>
Rating from previous report	Substantially Meets
Justification from previous report	Evidence provided demonstrates policies and implementation of robust training to prevent and address harassment, intimidation and/or exploitation, especially with regards to women. Grievance mechanism and form for registering a dispute provided. Interviews

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with workers and mine management confirm awareness of how harassment complaints can be lodged and the process for addressing them. However, interviews with workers also suggest more measures and attention are needed to ensure employees and contractors are comfortable using multiple grievance platforms available. Interviews with several workers and work groups raised the potential for safety concerns or other grievances not being brought forward due to relational or communication weaknesses within their respective work environments.

In the second half of 2022 the site rolled out Gender Based Violence workshops for all levels of the organization. All shift employees and straight shift employees were covered.

In second half of 2022 the Woman in Mining committee was re-instated / established. A campaign was launched to create awareness of the functions of the committee. The committee provides also voice for women that might not feel comfortable to speak out in the normal forums.

An awareness campaign is currently running on site television screens at the entrance to the mine. The campaign is intended to make people aware of the Your Voice platform where you can raise sensitive cases, including Victimization/harassment. Your Voice is currently addressed in ' Digging Deeper', the mine's newspaper.

On the 26th of January 2023 a presentation on psychological safety was made to management, this included the updated Bully, Harassment and Victimization policy and launch of a 'Living with the Dignity Hub'. Plant shift employees have now been exposed to the same presentation. Contract workers have not yet been addressed.

A digital platform called 'Engage app', which was developed for Covid, is installed on all employees and contractors' cellphones. The App includes the Psychological Safety Header where all the policies and how to report, on any safety, harassment etc. matter, is available.

The site's next step will be to recommunicate to all contractors the Bullying, Harassment, and Victimization Policy and Psychological Safety, a campaign will then be launched, and a competition will be run. This is all aimed at encouraging all employees to take part in 'Getting to know more about Kolomela's stance of speaking up for everyone. (Bully, Harassment and Victimization and Living with Dignity Hub process)".

As contractors had not yet been covered during the visit to the mine in April 2023, it was deemed not necessary to conduct interviews with contractors at that time.

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**Planned Corrective Action(s) from previous report**

Kolomela Mine will communicate the Group Policies on Bullying, Harassment & Victimization, Human Rights Policy, Group Inclusion and Diversity Policy and the Living with Dignity Hub.

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Kumba will aim to roll-out training on Sexual Harassment Procedures, Bullying, Harassment & Victimization Policies, Human Rights Policy, Grievance Management in the Workplace, and Gender Based Violence to show attendance of employees across departments to indicate that the company has taken measures to prevent harassment, intimidation, and/or exploitation, especially in regard to female workers.

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**Comments on Progress**

The mine has rolled out enhanced and mandatory training and communications programs on Bullying, Victimization and Harassment and the implementation of a Living with Dignity Hub for addressing serious incidents. Some progress has been made to encourage contract workers to use available grievance mechanisms that the Mine provides. While evidence was provided of close-out of grievance lodged, information for contract employer grievances was not available and out of scope for the audit. Implementation of the Living with Dignity Hub has received some positive comments from internal stakeholders for its ability to manage serious incidents of harassment and intimidation effectively and anonymously. However, other stakeholders raised concerns regarding the length of time taken to reach resolution and the inability to represent workers in this process. These factors may reduce Living with Dignity Hub usage, especially by contract workers. Surveillance audit interviews continue to indicate that discrimination and intimidation of contract workers by direct employees remains a persistent issue requiring ongoing attention. With these outstanding and persistent issues, this requirement remains at a rating of Substantially Meets.

**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.

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<b>Critical</b>	<b>Yes</b>
<b>Rating from previous report</b>	Substantially meets
<b>Justification from previous report</b>	Interviews with workers and management indicate there are functioning grievance mechanism in place, which includes an appropriate level of management to address concerns promptly, transparency and timely feedback, anonymity, and allowance for worker representatives. Grievance and disciplinary procedures do not impede other judicial or administrative remedies.
<b>Planned Corrective Action(s) from previous report</b>	Kolomela 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. Further work to create awareness on contractors employees to various platforms where complaints can be lodged will be done. Specific actions taken may include: training records on the grievance complaint reporting process, the inclusion of Living with Dignity Hub process into employee induction, posters indicating how employees can report on the Engage App, for a different channel than email for accessibility purposes
<b>Comments on Progress</b>	The mine has rolled out mandatory training and an Engage poster campaign to highlight available grievance mechanisms and how to use them. Mention of the Living with Dignity Hub is also included in training. However, surveillance audit interviews continue to indicate that contract workers are much less likely to lodge grievances through established mechanisms and procedures. This is especially true for contracted workers that report being employed without a signed contract. While the Mine provided evidence of close-out of grievance lodged for its own internal processes, information for contract employer grievances was not available and out of scope for the audit. To date, the scope of audit process has precluded investigation of supplier grievance mechanisms, procedures and their usage. As mentioned earlier, given that roughly half of the Kolomela Mine workforce are contract workers, this is an area requiring further investigation and monitoring, prior to and during the next audit. This requirement remains rated as Substantially Meets.
<b>Requirement #</b>	<b>3.2.4.1.</b>
<b>Requirement</b>	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**

The site's Operational Risk Management Program (ORMP) establishes how workers are to be informed of the hazards, health risks and preventative and protective measures associated with their work. However, the site tour identified that job risk assessments were not made available to workers in all instances. Subsequent documentation reviewed showed that the site during the months of January,

February and March 2023 issued 48 and 34 Job Risk Assessments (JRA's) for High Risk Work (HRW) and 46 and 32 Work Execution Documents (WED's). In March 33 Job Risk Assessments (JRA's) for High-Risk Work (HRW) and 33 Work Execution Documents (WED's). The site had no corresponding information for the months of July - December 2022.

The site has established a detailed personal protective equipment (PPE) specification, procedure and standard and auditors confirmed through discussions with works and contractors that PPE is provided and maintained at no cost to workers. However, respirator fit testing is currently not a part of this program, and no subsequent documentation was submitted to prove that specific training is being conducted on the fitment of respirators. It is important to note that this is not a requirement under South Africa law, but it is a requirement in other countries and generally regarded as a preferred health and safety practice.

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While onsite, tours were conducted of the Emergency Response and Occupational Health & Safety facilities available to all employees, and contracted services for advanced patient transport were confirmed. Health and safety training programs were sampled and reviewed. Adequate supervision of workers was generally observed. However, required supervision was found not to be in place during a particular instance of hazardous work, observed during the site tour. At the time of the follow-up audit no evidence could be found that an investigation was conducted and that any corrective actions were taken.

During the Stage 2 follow-up assessment, additional evidence was reviewed by the audit team. The evidence provided shows that the mine has a process in place for managing High Risk Work and has communicated the requirements for managing High Risk Work to its workers. On 23 March 2022 an internal Section 54 (Mine Health and Safety Act), form #11400 was issued, identifying, and confirming the issues observed by the audit team. Following this, an investigation and recommunication of the JRA to relevant employees was given and the Section 54 was uplifted on 25 March 2022. Corrective actions identified included the Section Manager to ensure that all high-risk work are supervised and that existing JRA for the isolation and lockout is re-communicated to employees. Actions were assigned and tracked in the organization's corrective action tracking system. Additional preventative actions were identified and included review of the high-risk work procedure, recommunication of high-risk work procedure to all employees and the digitization of WEDs and job cards to prevent tasks being executed without WEDs.

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**Planned Corrective Action(s) from previous report**

Kolomela Mine uses a Workplace Risk Assessment and Control (WRAC) document to identify and manage hazards across operational areas. Preventive measures are documented and communicated through induction and ongoing training. The audit confirmed that hazard communication is part of onboarding and refresher programmes. Personal Protective Equipment (PPE) is provided to all workers at no cost. The WRAC document lists PPE as a control for multiple risks, including dust, noise, and chemical exposure. PPE protocols were reviewed and updated, and training is integrated into safety induction programmes. Kolomela Mine maintains a medical facility that offers Pre-employment, periodic, and exit medicals. Emergency response for trauma and mass casualty events. On-site rehabilitation and return-to-work evaluations.

Access to paramedics and clinic services. Emergency transport procedures are documented and aligned with IRMA expectations. The audit verified the presence of first aid kits, ambulance services, and coordination with nearby hospitals. The Exposure Reduction Plan 2025 outlines quarterly training activities covering Hazard awareness, Control measures, Health effects of inhalable hazards, carcinogens, and noise. Training records are maintained and

updated. Supervisors follow a training matrix and may hold safety management certifications. The audit confirmed that training is delivered by accredited trainers and tracked via Passport 360. Kolomela Mine uses Visible Felt Leadership (VFL) oversight to monitor supervisory engagement. Band 6 and above employees log weekly field engagement hours. This structured monitoring system was reviewed during the audit and found to be effective.

**Comments on Progress**

Kolomela Mine has addressed all of the gaps identified in the previous audit. The high-risk work procedure was re-communicated to employees, and the digitization of Work Execution Documents (WEDs) and job cards has been implemented to prevent tasks from being executed without proper documentation. Personal Protective Equipment (PPE) protocols were reviewed and updated, and interviews during this surveillance confirmed that PPE continues to be provided at no cost to workers, with no new complaints raised. Training on hazard awareness and control measures has been integrated into safety induction and refresher programs, and records are maintained via Passport 360. Supervisory oversight has improved through the Visible Felt Leadership (VFL) system, which tracks weekly engagement hours. No similar issues regarding lack of supervision or missing Job Risk Assessments (JRA) were observed during this audit, indicating that corrective actions have been effective.

New concerns noted during the surveillance audit, were related to the mine’s understanding of potential risk and implementation of suitable control measures, such as improved PPE, to address exposure to potentially hazardous wash water at the Heavy Equipment Shop and wash bay (see Section 4.3.2). Consequently, the rating of Substantially Meets is still considered appropriate for this critical requirement

<b>Requirement #</b>	<b>4.1.5.1.</b>
<b>Requirement</b>	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP)
<b>Critical</b>	<b>Yes</b>
<b>Rating from previous report</b>	Substantially Meets

Justification from previous report	<p>All considerations made during the design and mitigation of risks of the Tailings Storage Facility (TSF) and associated Waste Rock Dumps are stipulated in the Tailings Storage Facility (TSF) Final Design Report, March 2010. The design approach subscribed to best practice principles and represents a second generation Tailings Storage Facility (TSF) design.</p> <p>Although other options have been considered for the other waste facilities, it could not clearly be established that the best available technologies (BAT) and best available/applicable practices (BAP) were specifically looked at.</p>
Planned Corrective Action(s) from previous report	<p>Kolomela Mine has implemented the Group-Level standard for Mineral Residue Facilities and Water Management Structure Standard which indicates that the mine is implementing the standard for the design and mitigation of risks at site level. By 2025, Kolomela Mine will be expected to comply with the Global Industry Standard on Tailings Management (GISTM) which is considered to be as the best available practice (BAP) and best available technology (BAT) to design and mitigate risks associated with tailings facilities. With regard to other waste facilities, an internal investigation and gap analysis against BAT and BAP for these facilities will be undertaken.</p>
Comments on Progress	<p>Kolomela Mine has advanced its approach to mine waste facility management by adopting Anglo American's Mineral Residue Facilities and Water Management Structure Standard, which incorporates best practice principles. Since the initial IRMA assessment, a gap analysis was initiated to compare existing waste facilities against Best Available Technologies (BAT) and Best Available Practices (BAP). The Tailings Storage Facility (TSF) remains governed by the 2010 Final Design Report, but recent actions include internal reviews to align with the Global Industry Standard on Tailings Management (GISTM) ahead of the 2025 compliance deadline. While no major structural changes have been reported, procedural updates and governance improvements have been implemented to strengthen risk mitigation. Additionally, a third-party verification of GISTM readiness was completed but evidence of external assessment has not yet been provided. This requirement is now rated Fully Meets.</p>
Requirement #	4.2.4.4.
Requirement	<p>The operating company shall develop and implement an adaptive management plan for water that:</p> <ul style="list-style-type: none"> <li>a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in</li> </ul>

	<p>surface water and groundwater quality and quantity related to the mining project; and</p> <p>b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.</p>
<b>Critical</b>	<b>Yes</b>
<b>Rating from previous report</b>	Substantially Meets
<b>Justification from previous report</b>	<p>At the time of the Stage 2 assessment, the Kumba (Head office) Adaptive Water Management Standard had not been finalized, which was identified as a gap by the audit team. During the Stage 2 follow-up assessment, the audit team reviewed the additional information provided. The evidence reviewed included the "Kumba Iron Ore Adaptive Water Management Standard" and the "Kolomela Mine Adaptive Water Management Plan", which establishes two environmental objectives, and general trigger levels and actions. The trigger levels reference Site-Specific-Trigger Values (SSTVs). The "Integrated Water and Waste Management Plan" is referenced by the Adaptive Water Management Plan and includes information such as monitoring locations. Additional supporting documentation was presented to the audit team, explaining the relationship between the Kolomela Adaptive Water Management Plan, the Kumba Adaptive Water Management Standard, and the Integrated Water and Waste Management Plan. Collectively these plans outline adaptive management actions to mitigate impacts on current and future uses of</p> <p>water and response to changes in water quality and quantity as certain indicators (SSTVs) are reached. The effective implementation of these three key plans for adaptive water management will be an area of focus during the surveillance audit.</p>
<b>Planned Corrective Action(s) from previous report</b>	<p>Kolomela Mine has developed an Adaptive Water Management Plan aligned with the Kumba Adaptive Water Management Standard. The plan will be updated annually. Specific actions to address the finding include:</p> <ul style="list-style-type: none"> <li>- Annual review of the effectiveness of the water management measures in preventing negative changes in the two water quality objectives established in the plan.</li> </ul>
<b>Comments on Progress</b>	<p>Since 2022, Kumba Iron Ore has done a lot of work on water management, across the organization, with a focus on implementing the adaptive water management plan (AWMP) and improving integration of site water management with the regional</p>

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scheme. Development of the AWMP included stakeholder engagement via community relations team involvement.

Since the previous audit report was published, the AWMP was implemented and has undergone a further round of revision/update. Completion of the update and implementation of the AWMP, aligned with other water stewardship activities, the integrated water and waste management plan, and overall sustainability strategy updates represents satisfactory completion of the corrective actions and shows commitment to ongoing continuous improvement in this area. The rating can therefore be upgraded to Fully Meets.

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## 3.6. Notable Performance Improvements

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

- Development of standard operating procedure for Sishen and Kolomela, integrating best practices from all sites, and aligned with UN Guiding Principles and the Anglo-way process.

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

- In 2024, the mine significantly exceeded its reclamation and re-seeding goals for the year.
- Following an update of its Emergency Preparedness and Response Plan to align with the UN APELL 10-step framework, Kolomela conducted multiple fire and mass casualty simulations, and improved stakeholder engagement through quarterly forums and community drills.

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

- Quarterly training modules now include hazard awareness and exposure reduction strategies.
- Emergency preparedness has advanced with updated procedures, faster response times, and comprehensive drills for mass casualty scenarios.
- Health initiatives have expanded access to care, with smart lockers for chronic medication, and HIV/TB coaching programs reaching over 1,200 individuals.

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

- Finalization and implementation of the Adaptive Water Management Plan (AWMP)
- Implementation of Anglo American's climate strategy leading to reductions in Scope 1 emissions and advancing renewable energy projects such as solar and wind installations.

### 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. Some workers were reportedly without contracts, severely limiting their ability to raise grievances without fear of reprisal.

During the initial IRMA assessment, while these and other concerns were noted and discussed, the related requirements were evaluated based on the mine's performance, as related to direct employees of the mine only as the term "operating company" was interpreted to mean the Company operating the mine site, namely Kumba Iron Ore, a subsidiary of Anglo American. Subsequent to that initial assessment, the related IRMA requirements have been interpreted as applying to all workers, i.e. including both the Company operating the mine and all suppliers. As this could not have been communicated to the mine at the time, the mine was not expected to develop and implement corrective actions. Consequently, the critical requirements related to these issues (primarily 3.1.2.1) have not been re-rated at this time. In this context, interviews with direct employee, union representatives and contract workers indicate that the Operating Company does not fully comply with its responsibilities under the Company's Responsible Sourcing Standard (Section 3.5) or South African law regarding the freedom to associate of workers. All related requirements will be fully re-evaluated at the renewal audit (anticipated in 2027). See Section 6.3. for more details.

## 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 principle received an overall score of 86%. 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. Critical requirement 1.1.1.1 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.

An integrated permitting standard was published in April 2024. The mine expected to achieve full conformance to the standard by end of year 2027. The standard contains a revised requirement to conduct external compliance audits on 3 yr cycle, but the mine is proposing to do so annually. The first audit under this scheme was planned for the end of Oct 2025.

An external compliance audit was completed in late 2023 through April 2024. At the time of the IRMA surveillance audit, actions arising from this compliance audit were mostly completed, and being tracked through the mine's action tracking software, Isometrix. For permits, the mine has a process to summarize the status of conditions and commitments.

The mine continues to maintain a dashboard to highlight permit renewal and action status, and a summary feeds into company reporting. Various other linked platforms and reports are available to safety, health and environment (SHE) personnel to allow individual departments/sections to understand their action performance.

Based on worker interviews conducted during the IRMA audit in 2022 and the surveillance audit in 2025, some contractors are not providing all their

employees with proper work contracts and are forbidding them or strongly discouraging them from joining unions. Some contractors are also making it difficult for their workers to obtain replacement PPE, as required by IRMA. The mine was not able to demonstrate that it takes appropriate steps under its own Responsible Sourcing Standard (section 3.5) to ensure compliance with IRMA requirements by all relevant contractors, as per requirement 1.1.4.1. This non-critical requirement was rated at “partially meets” in the initial audit, and this rating was not changed.

## **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.

Surveillance audit interviews indicate an interest by stakeholders in continued efforts to improve communications. A noted example and model for effective communications and collaboration was the Environmental Forum. Little evidence was found that indicates that Community Boxes are used.

The Mine highlighted that the Social and Labour Plan (SLP 4) consultation process at Kolomela was designed to be inclusive and meaningful. The Mine engaged with a broad range of stakeholders, including community representatives, through outreach sessions to solicit feedback on proposed projects. Inputs received during these consultations were reviewed and incorporated into the final SLP 4. The Mine provided evidence stakeholders being informed during Stakeholder Days and periodic meetings regarding how their inputs shaped the final SLP 4. However, stakeholders interviewed during the surveillance audit questioned whether the Social Labour Plan process resulted in implementation of projects that are an accurate reflection of community needs. Stakeholders also questioned the fairness of the project construction selection process, noting the dominance of selected contractors over other qualified local suppliers.

## **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 and one requirement which did not achieve a Fully

Meets rating at the initial audit. Critical requirements 1.3.1.1. and 1.3.2.1. were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for critical requirements. Progress on the critical requirement, 1.3.3.3., is summarized in Section 3.5.

A document prepared for Anglo American, “South Africa; Security & Human Rights External Context Assessment (2024) was reviewed. In its annual reporting, the Mine has not rated any social incidents at a level 4 or 5 (significant) since the initial audit. Stakeholder interviews support this corporate finding. The terms of reference for a Kumba Human Rights Working Group has been developed and the group met twice in 2025. Quarterly Social and human rights impact and risk analysis (SHIRA) are being conducted but a proposed case study approach to stakeholder reporting has yet to be implemented.

As part of the Kumba Iron Ore Sishen Mine surveillance audit, the audit team is reviewing the relevance of Chapter 2.2 Free Prior Informed Consent chapter in light of ongoing engagement by the mine with self-identified Indigenous representatives including Korana First Nation and other groups. This may have cross-cutting considerations for Chapter 1.3 in the next Kolomela Mine audit.

## **Chapter 1.4—Complaints Mechanism/Access to Remedy**

Chapter 1.4 was partially audited during the surveillance audit. Auditing was focused primarily on four requirements from this chapter, including critical requirement 1.4.1.1. and three requirements which did not achieve a Fully Meets rating at the initial audit. This chapter’s critical requirement was rated as fully meets in the initial audit.

Since the initial IRMA audit, the mine has carried out work to engage stakeholders and enhance processes for gathering, recording and responding to grievances. There is now a single standard operating procedure for Sishen and Kolomela, integrating best practices from across the operating company, aligned with UN Guiding Principles and following the Anglo-way process. This requirement remains at Fully Meets.

## **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. and four requirements which did not achieve a Fully Meets rating at the initial audit. This chapter's critical requirement was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for the critical requirement.

Training in anti-corruption/ethics requirements is required as part of the pre-employment process and on an ongoing basis. The training is integrated into the mine's Learning Management System. Since the initial IRMA audit, a bonus penalty for not completing mandatory training was introduced and improvements in completion rates have been recorded.

The mine continues to use the "Your Voice" reporting line for petty/local corrupt activities, which is accessible to both internal and external individuals. Reports on this and other sources of reporting go to a management committee on a quarterly basis. An internal ethics committee reviews relevant issues that have been reported to security teams, or which are identified through other channels. The internal audit team could also detect issues related to bribery, corruption and ethics, which would be addressed through relevant channels.

## 4.2. Principle 2: Planning for Positive Legacies

During the previous audit, this principle received an overall score of 80%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

### **Chapter 2.1—Environmental Social Impact Assessment and Management**

Chapter 2.1 was partially audited during the surveillance audit. Auditing was focused primarily on ten requirements from this chapter, including critical requirement 2.1.3.1, which was rated Fully Meets at the initial audit. Evidence reviewed during the surveillance audit confirmed the prior rating.

Kolomela Mine's original Environmental Social Impact Assessment (ESIA) was completed under South African licensing requirements and included full public participation. Since the initial IRMA audit, no new ESIA was undertaken. Monitoring and compliance audits remain in place, with results shared annually with regulators and stakeholders.

## Chapter 2.2—Free, Prior and Informed Consent

During the initial audit, Chapter 2.2. was marked as not relevant given that no Indigenous groups were recognized, identified, self-identified or engaged by the Mine with respect to the Kolomela Mine. Since then, Kumba Iron Ore has developed an integrated management system for the Kolomela and Sishen mines.

While recognition of Indigenous Peoples and rights continues to evolve in the South African context, at the surveillance audit, the audit team verified that the issues considered during the initial audit had not changed demonstrably in terms of the specific applicability of chapter 2.2 to the Kolomela Mine. Engagement with the asserted leadership of the Groenwater community and the Griqua Peoples (Korana First Nation), which was identified for follow-up in the initial audit, was conducted via a conference call and in-person meeting as part of the Kumba Iron Ore Sishen Mine surveillance audit. Discussions during those meetings focused primarily on Sishen Mine related activities and potential impacts. Accordingly, during surveillance review this chapter remains not relevant. This relevancy of this chapter will be reassessed in the next audit. This might have cross-cutting considerations for both chapters 2.2. and 1.3.

## Chapter 2.3—Community Support and Benefits

Chapter 2.3 was partially audited during the surveillance audit. Auditing was focused primarily on the three requirements from this chapter that did not achieve a Fully Meets rating at the initial audit.

The mine's corporate reporting notes that most community grievances are focused around a perceived inadequacy of related employment and procurement – related opportunities. Surveillance audit interviews with community leaders and non-profit representatives also emphasized the potential for improved collaboration and communications on community-prioritized infrastructure projects.

In relation to the Mine's impact on local communities, a range of issues and themes were covered during audit discussions including an effective model for dialogue to coordinate mitigation of environmental concerns (an Environmental Forum), and increased migration into the Postmasburg area that has resulted disparities in the distribution of employment or other benefits to outlying rural communities. A farmer representative noted

increased water scarcity linked to Mine water de-watering and other agricultural impacts. While noting Kumba Iron Ore's ongoing contributions, participants highlighted a local housing backlog and insufficient infrastructure. Participants mentioned economic development training programs provided by the Mine over available employment opportunities. Some projects initiated through Social Labour Plan process remained incomplete, with some participants questioning whether projects are guided by actual community priorities, interviewees requested more inclusive and participatory planning initiatives in the future. Since the initial audit the Mine has maintained community support in the urban areas closest to the mining activity and is making progress in engaging with more rural and remote residents through forums and other consultations processes. However, stakeholders, both urban and rural, continue to seek more tangible benefits for local communities.

## **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 the issues addressed in the chapter continue to not be applicable at the mine. During the review this chapter remains as not relevant.

## **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, including 2.5.1.1, which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement 2.5.1.1. is summarized in Section 3.5. Evidence reviewed during the surveillance audit confirmed the prior rating for critical requirement 2.5.2.1.

Kolomela has made measurable progress in strengthening its emergency preparedness and response systems. The mine has updated its procedures to align with international standards, conducted practical exercises, and involved community stakeholders in planning and simulations. Interviews during the assessment confirmed that exercises were taking place and that stakeholder involvement was improving.

Kolomela Mine has updated its Emergency Preparedness and Response Plan (EPRP) in September 2025 to incorporate the United Nations Environment

Programme's APELL (Awareness and Preparedness for Emergencies at Local Level) framework.

Kolomela Mine improved involvement of both workers and community members in emergency planning, via mechanisms such as the stakeholder engagement day held on April 17, 2024, where emergency procedures and human rights principles were presented to community representatives, Participation of community members in emergency simulations, including fire drills conducted across different zones of the mine in 2024, Formation of internal and external review committees to assess emergency risks and response capabilities, Quarterly Emergency Support Forums involving government, private sector, and neighbouring mines and Monthly Mine Crime Combating Forum (MCCF) meetings addressing security-related emergencies such as extortion and road blockades. The audit also verified attendance registers and reviewed the content shared during stakeholder engagements to confirm meaningful participation.

Kolomela Mine has conducted regular emergency drills to test its preparedness since the initial audit, including annual mass casualty simulations and fire exercises across multiple site zones. These drills were scheduled and tracked through the Isometrics system, with corrective actions and feedback shared with stakeholders. The mine maintains an annual drill schedule, and updated records for 2025 drills were provided at the time of review.

The mine continues to use established platforms for emergency communication and coordination such as Polsec and CPF forums, that support surveillance and crime prevention in hotspot areas. Emergency procedures include maps and spatial context for vulnerable populations and emergency zones. Coordination with Postmasburg Hospital includes infrastructure upgrades and ambulance services and SMS alert systems and dispatch protocols are in place for trauma and mass casualty events. These systems were reviewed during the audit, and documentation was found to be consistent with IRMA expectations.

Kolomela's tailing facilities are extremely small, compared to many other mines. They were assessed via drone in 2025. The audit confirmed no external community impact due to strategic location and buffer zones, The mine owns surrounding land, reducing risk to neighbouring communities. However, tailings risks are integrated into the emergency response plan.

## Chapter 2.6—Planning/Financing Reclamation & Closure

Chapter 2.6 was partially audited during the surveillance audit. Auditing was focused primarily on eleven requirements from this chapter, including, including three critical requirements (2.6.2.1., 2.6.2.6., 2.6.4.1.) and eight requirements that did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement 2.6.4.1. is summarized in Section 3.5. Critical requirement 2.6.2.1. 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.

Since the initial IRMA audit, consolidation between Kolomela and Sishen mines has resulted in a business manager with responsibility for reclamation. Additionally, the mine has revised the reclamation/rehabilitation process, including a change from 3 year to 5 year review.

The mine's sustainability strategy currently includes rehabilitation programs through 2030. Closure /reclamation activities so far have mainly been focused on waste rock dumps. Rehabilitation has been ongoing, concurrent with dumps meeting final height, etc. The dense media separation (DMS) plant at Kolomela shut down in 2023. There is a possibility of re-opening this facility, so there has been no change to related rehabilitation plans or activities yet.

The mine is aware of upcoming updated regulations that will affect financial provisions and require additional community sustainability activities. The mine has determined they are already aligned with most of these proposals.

During the site visit, areas were pointed out where rehabilitation of closed waste rock dumps was taking place. Responsible personnel confirmed that this was proceeding in accordance with the plan and that associated targets were met. The mine reported significantly exceeding targets for hectares reshaped and re-seeded in 2024.

### 4.3. Principle 3: Social Responsibility

During the previous audit, this principle received an overall score of 88%. 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 (3.1.2.1., 3.1.3.3., 3.1.5.1., 3.1.7.2., 3.1.7.3., 3.1.8.1.) and five requirements which did not achieve a Fully Meets rating at the initial audit. Of this chapter's six critical requirements, three were rated as fully meets in the initial audit. The remaining critical requirements, 3.1.2.1., 3.1.3.3. and 3.1.5.1. were rated as substantially meets. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for critical requirements, noting the re-interpretation mentioned earlier of the meaning of "operating company" in 3.1.2.1. Progress on these critical requirements is summarized in Section 3.5.

In 2024, Anglo American implemented a Responsible Sourcing Standard for Suppliers. Section 3.5 references "Permit freedom of association and allow unrestricted access to confidential grievance mechanisms".

During interviews and discussion with personnel during the assessment, most mine employees and many contractors reported knowing the mechanisms available to them for reporting grievances and that issues are handled in an acceptable manner. A few contractor employees, however, reported that their main approach was to report via their supervisors, but that doing so could impact their employment, so they generally did not report grievances at all. Mine employees and most contract workers stated that they could report concerns without fear for their job security. However, they did not always know if their concerns had resulted in any investigation or action.

During the initial IRMA assessment, similar concerns regarding some contractor employees' reluctance to report grievances were noted and discussed. However, conformance to critical requirement 1.4.1.1 was evaluated based on the mine's performance, as related to direct employees of the mine only. Subsequent to that initial assessment, the related IRMA requirements have been interpreted as applying to all workers. As this could not have been communicated to the mine at the time, the mine was not expected to develop and implement corrective actions. Consequently, the critical requirement 3.1.5.1 related to this issue has been downgraded to facilitate the preparation of a corrective action plan related to evaluation, monitoring and effectiveness of contract employer grievance mechanisms and processes. The

effectiveness of the operational-level grievance mechanism will be further reviewed at the next audit.

The most notable change is how the terms “operating company” and “workers” will be interpreted going forward and in subsequent IRMA audits. Requirements with respect to the operating company will be interpreted to extend to the suppliers / employers of contracted workers at the mine. Hence, respect for freedom to associate requirements in the IRMA standard will apply equally to suppliers, as they do in the South African constitution.

Since the initial audit, the mine has developed a new initiative, “Everyone’s Dignity Matters” programme, to promote care, dignity and respect in the workplace.

## Chapter 3.2—Occupational Health and Safety

Chapter 3.2 was partially audited during the surveillance audit. Auditing was focused primarily on the seven requirements from this chapter, including critical requirement 3.2.4.1, which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement is summarized in Section 3.5.

Kolomela Mine has reviewed and updated Personal Protective Equipment (PPE) protocols and revising the PPE procedure to reflect current standards. Updated documentation was distributed to relevant personnel, and these changes were integrated into onboarding and refresher training programmes. However, one interview with a contractor worker indicated some concerns regarding the quality and effectiveness of PPE. Specifically, PPE provided was reported to lack durability, with frequent tearing during normal use, and may not offer sufficient protection for employees operating in hazardous environments. These concerns were not raised by other workers.

Kolomela Mine continues to maintain a medical facility that offers pre-employment, periodic, and exit medicals, emergency response for trauma and mass casualty events, on-site rehabilitation and return-to-work evaluations and access to paramedics and clinic services. Emergency transport procedures are documented and aligned with IRMA expectations. The surveillance audit verified the presence of first aid kits, ambulance services, and coordination with nearby hospitals.

Kumba Iron Ore launched Fatal Risk Management (FRM) in July 2025. This program has a simplified identification of critical controls. There has also been a focus on areas identified by the safety committee.

The mine has developed an Exposure Reduction Plan 2025, which outlines quarterly training activities covering hazard awareness, control measures, health effects of inhalable hazards, carcinogens, and noise. Training records are maintained and updated. Supervisors follow a training matrix and may hold safety management certifications. The audit confirmed that training is delivered by accredited trainers and tracked via Passport 360.

During the site inspection, observations and discussions identified a concern related to PPE utilized by personnel washing heavy equipment, which did not seem appropriate to the hazards involved. The water was being recycled and was foul smelling. Water sampling had taken place but analytical results had not been received, and no interim measures had been taken to control against potential exposure to micro-organisms or contaminants in the water. In particular, workers were using dust masks and safety glasses, rather than more substantial protection from inhaling spray or getting it in eyes. Reportedly, a project was underway to direct potable water to the heavy equipment shop for vehicle washing, in order to avoid using the recycled, smelly water there. As a result of this finding, the critical requirement 3.2.4.1. continues to be rated as Substantially Meets.

### Chapter 3.3—Community Health and Safety

Chapter 3.3 was partially audited during the surveillance audit. Auditing was focused primarily on five requirements from this chapter, including critical requirement 3.3.1.1. and four requirements which did not achieve a Fully Meets rating at the initial audit. This chapter's critical requirement was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for the critical requirement.

The Community Health and Wellbeing Programme, which was established prior to the initial audit, has been significantly expanded between 2023 and 2025 to increase healthcare access for host communities. The reach of the programme has increased from 32,000 to 79,000 individuals, with scaled HIV and TB support to 1,234 men with a 60% retention rate, and enrollment of 295 girls and young women in adolescent support initiatives.

The mine continues to provide support to six clinics in host communities. Since the initial audit, infrastructure support was enhanced through the donation of X-ray machines for TB diagnosis and extension of ambulance services to community emergencies. Additionally, a theatre was upgraded at Postmasburg Hospital and smart lockers for chronic medication access were installed, registering 233 users. Safety and crime prevention measures were

also reinforced with the donation of two vehicles to the traffic department and the installation of surveillance cameras in strategic areas. These expansions were verified through documentation, attendance registers, and audit interviews, confirming ongoing improvements since the initial audit.

Programme effectiveness is reviewed annually, and quarterly monitoring is reported to the Safety, Health and Sustainable Development Committee. Corrective actions are documented and tracked, and programme alignment with internal standards is maintained.

Kolomela tracks 166 commitments across its health and safety programmes. As of October 2025, the compliance rate is 75%. The mine has continued to engage stakeholders in the implementation of its health and safety programmes via Quarterly Environmental Forums with farmers, municipalities, and regulators, collaboration with the Department of Health and NGOs. Feedback from community consultations has informed adjustments to adolescent support programmes and traffic safety measures. Communication materials were evidenced to be provided in both English and Afrikaans.

### **Chapter 3.4— Mining and Conflict-Affected or 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. During the review this chapter remains as not relevant.

### **Chapter 3.5—Security Arrangements**

Chapter 3.5 was partially audited during the surveillance audit, focusing on four requirements, including critical requirement 3.5.1.2, which remains rated Fully Meets. Evidence reviewed confirmed that Kolomela mine continues to implement a structured security framework aligned with international human rights standards.

The mine maintains its Use of Force and Firearms Management Standard, consistent with UN Basic Principles and the Voluntary Principles on Security and Human Rights (VPSHR).

Collaborative structures remain active to address potential conflicts between security and communities, with monthly forum meetings and culturally appropriate mitigation strategies documented and implemented.

Engagement with public security forces continues under informal agreements and training initiatives, The mine has maintained VPSHR training, psychological screening for armed personnel, armoury management protocols, and drone surveillance with defined operational boundaries. Security personnel are trained to avoid confrontation, escalate incidents to South Africa Police Service (SAPS), and apply graduated weapon use based on threat levels. These practices were verified through documentation, training records, and stakeholder interviews, confirming ongoing compliance without major changes since the initial audit.

### **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 the issues addressed in the chapter continue to not be applicable at the mine. During the review this chapter remains as not relevant.

### **Chapter 3.7—Cultural Heritage**

This chapter was not audited in this surveillance audit. No changes were noted during desktop or onsite.

## **4.4. Principle 4: Environmental Responsibility**

During the previous audit, this principle received an overall score of 84%. 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., 4.1.8.1.), and four requirements which did not achieve a Fully Meets rating at the initial audit. Of this chapter's four critical requirements, three requirements (4.1.4.1., 4.1.5.6., 4.1.8.1.) 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. Critical requirement 4.1.5.1. was rated as substantially meets. Progress on this critical requirement is summarized in Section 3.5.

Since the initial IRMA audit, the construction of pollution control dams has been re-evaluated and determined to be in-line with Best Applicable Practices in the Anglo American Group Technical Standard.

A tour of the waste management facility confirmed that waste streams were being segregated to enhance recyclability. Hazardous waste was separated and stored appropriately. A recent change to eliminate rinsing of small containers containing hazardous chemical residues had been implemented by the area manager and has been under review.

The mine has very limited use of hazardous chemicals, there was little evidence of materials other than empty chemical containers and paint waste coming to the waste management facility, and no concerning practices were noted

The mine continues to not use riverine, submarine or lake disposal for mine waste materials.

Waste landfill facilities at the mine were not visited during the surveillance audit.

## 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 (4.2.4.1., 4.2.4.4.), and eight requirements which did not achieve a Fully Meets rating at the initial audit. Of this chapter's critical requirements, 4.2.4.1 was fully met in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement. Critical requirement 4.2.4.4 was rated as substantially meets. Progress on this critical requirement is summarized in Section 3.5.

Since 2022, Kumba Iron Ore has carried out a lot of work on water management across the organization, including at Kolomela. As part of a sustainability update, the mine's water management strategy was refreshed by a multi-disciplinary team, including water, social, tailings and environmental personnel. Adaptive water management has been an improvement in the integrated management of site water and the regional scheme.

In general, the mine considers catchment water management, rather than having only a site-specific focus. To this end, the mine water management processes are integrated with the regional water management scheme,

which has multiple users, including government municipality, farmers, and mines.

Principal mine-related concerns are dewatering and management of surface water resources.

Pursuant to critical requirement 4.2.4.4 the Adaptive Water Management Plan (AWMP) was completed, implemented and has undergone a further round of revision/update since the initial report was published. This was aligned with other water stewardship activities, the integrated water and waste management plan, and overall sustainability strategy updates. For more details, see section 3.5.

Monitoring and trigger-action-responses were updated and incorporated into the AWMP. The mine also identified areas of risk and is proposing projects to address those.

The site has compared the criteria in their permits to IRMA water quality criteria and determined there are some criteria where background/baseline levels exceed IRMA water quality parameters (as allowed for in the IRMA requirement).

The development of the AWMP included stakeholder engagement. The current strategy has addressed the gap and includes more stakeholder input via involvement of the Community Team.

## Chapter 4.3—Air Quality

Chapter 4.3 was partially audited during the surveillance audit. Auditing was focused primarily on two requirements, including the critical requirement 4.3.2.1, which was rated Fully Meets at the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for this critical requirement.

Kolomela Mine has continued to follow its air quality management system, originally implemented prior to the initial audit. The surveillance audit reviewed the Kolomela Mine Monthly Air Quality Report (August 2025), confirming that monitoring remains consistent with the Air Quality Management Plan and Environmental Management Plan

The mine monitors its air quality strategies by comparing monthly monitoring results to National Ambient Air Quality Standards (NAAQS). The mine integrates air quality considerations into emergency preparedness. For

example, the Kolomela South Veldt Fire Simulation Report (June 2024) shows that the Environmental Department was involved in managing air quality impacts during fire events.

Since the initial audit, the mine has been issued an updated Atmospheric Emission License (AEL) in February 2024, valid until March 31, 2029. Compliance is governed by South Africa's National Environmental Management: Air Quality Act and Controlled Emitters and Minimum Emission Standards (CEMA) regulations. The audit confirmed that the mine submits monthly air quality and instrumentation reports and complies with ambient dust fallout limits such as Industrial areas: 1200 µg/m<sup>3</sup>/month and Residential areas: 600 µg/m<sup>3</sup>/month.

Kolomela Mine also monitor PM10 and PM2.5 particulate matter using calibrated instruments and dust fallout using strategically placed buckets, with instrumentation and locations mapped in monthly reports. For example, the August 2025 report includes a map showing dust bucket locations (page 9). Findings are shared internally with mining teams, annually with farmers via an Environmental Forum, and quarterly with the Safety, Health and Sustainable Development Committee at head office. In addition, the 2024 fire simulation report included integration of air quality considerations into emergency preparedness, demonstrating that environmental factors are addressed during incident planning and drills.

In 2025, four PM10 exceedances were recorded (two in August, two in September). The mine conducted wind direction analysis and mineralogical assessments to determine whether dust originated from iron ore or agricultural sources and reviews their dust suppression measures and equipment availability. No exceedances were recorded near community monitoring stations. The audit confirmed that investigations were documented, and corrective actions tracked.

## 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.

Impact of mining activities on noise receptors was an area identified for follow-up from the initial audit. Since 2023, Kolomela Mine has conducted screening to identify offsite human noise receptors including seasonal

variation analysis. Sampling locations include residential farms such as Soetfontein, Klipbankfontein, Kameelfontein, selected for their relevance to human exposure. The audit reviewed both the Dry Season (July 2024) and Wet Season (February 2025) noise monitoring reports, which confirm that receptors were selected based on proximity to the mine and historical exposure data. A documented baseline ambient noise level uses historical data from 2003 as a reference. The reports include LA90 values for each site during day and night periods and make comparisons across multiple years (2003–2025). This data is used to track changes over time and assess the impact of mining activities on ambient noise levels.

Findings from the 2025 Wet Season report show that all sites recorded noise levels below International Finance Corporation (IFC) thresholds. However, during the 2024 Dry Season, Site 1 (Soetfontein) exceeded the daytime limit, reaching 57.4 dBA, attributed to increased traffic on the R383 road. Following the exceedance, the mine investigated the source, confirmed that the elevated levels were attributable to external traffic rather than mining operations, and documented the findings. Engagement with local authorities and transport stakeholders was initiated to explore traffic management options, and additional monitoring was scheduled for subsequent seasons to determine whether the exceedance was an isolated event or a recurring trend.

Workplace Exposure Reduction Plans have been implemented to reduce exposure to noise. The mine registered no equipment emitting noise above 107 dB in 2024, compared to 13 in 2023.

## **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. This chapter's critical requirement was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for the critical requirement.

Kolomela Mine now operates under Anglo American's Group-wide Climate Change Policy, which was launched in December 2024. The policy outlines commitments to reduce greenhouse gas (GHG) emissions across all operations, and follows a mitigation hierarchy, which prioritizes avoidance of emissions through energy and fuel efficiency over substitution with lower-emission energy sources, or compensating residual emissions via carbon-

negative projects and offsets. The policy sets operational decarbonization targets aligned with the Paris Agreement, and will be reviewed at least every five years or upon significant portfolio changes.

The 2024 Climate Change Report has set targets for reduction of energy intensity and Scope 1& 2 emissions by 2030. The lowered production on site and mothballing of dense media separation (DMS) plant has contributed to a reduction in scope 1 emissions between 2023 and 2024

For ongoing initiatives, the mine continues to implement its mitigation Site-level actions include progressing planned wind and solar projects (targeted for 2027) and maintaining its partnership with an organisation specializing in renewable energy under the ENVUSA programme. Kolomela continues to track emissions via its Power BI “Carbon and Energy” dashboard and discloses climate-related information aligned the Johannesburg Stock Exchange Climate Change Disclosure and Task Force on Climate-related Financial Disclosures (TCFD) standards.

## **Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas**

Chapter 4.6 was partially audited during the surveillance audit. Auditing was focused primarily on six requirements from this chapter, including critical requirements 4.6.2.1, and three requirements 4.6.4.1, 4.6.5.3 and 4.6.5.4, which were not relevant in the initial audit. Critical requirement 4.6.2.1 was rated Fully Meets at the initial audit. This review confirms that Kolomela continues to fully meets the critical requirements of IRMA Chapter 4.6.2.1.

No changes since the initial audit were identified in this chapter. The mine continues to carry out activities under its Environmental Management Programme (EMPr), which was in place at the time of the initial audit. Ongoing monitoring has continued to be carried out, and monitoring results have been shared with regulators and stakeholders through quarterly environmental forums.

## **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.

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

### Principle 1: Business Integrity

Req #	Previous Rating	Current Rating	Comment from Auditor
1.1.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.2.2.2.	Substantially Meets	Fully Meets	Corrective action plan completed and rating upgraded, see progress report in Section 3.5.
1.3.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.3.2.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

1.3.3.3.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and 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.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

## Principle 2: Planning for Positive Legacies

Req #	Previous 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	
2.5.1.1	Substantially Meets	Fully meets	Corrective action plan completed and rating upgraded, see progress report in Section 3.5.
2.5.2.1	Fully Meets	Fully meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.2.1	Fully Meets	Fully meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.2.6	Fully Meets	Fully meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.4.1	Substantially Meets	Fully meets	Evidence reviewed in this assessment suggests that a re-rating of this requirement to “Fully Meets” is justified.

### Principle 3: Social Responsibility

Req #	Previous Rating	Current Rating	Comment from Auditor
3.1.2.1	Substantially Meets	Substantially Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.3.3	Substantially Meets	Substantially Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.5.1	Substantially Meets	Substantially Meets	Evidence reviewed in this assessment confirms the previous rating.
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.
3.2.4.1.a, b	Substantially Meets	Substantially Meets	Evidence reviewed in this assessment confirms the previous rating. See Section 4.3 for more details and outstanding actions described in Section 6.1.
3.3.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.4.2.1	Not Relevant	Not Relevant	Evidence reviewed in this assessment confirms the previous rating.
3.5.1.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

## Principle 4: Environmental Responsibility

Req #	Previous Rating	Current Rating	Comment from Auditor
4.1.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.5.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment suggests that a re-rating of this requirement to “Fully Meets” is justified. See Section 4.3. for more details.
4.1.5.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.2.4.1. a-e	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.2.4.4	Substantially Meets	Fully Meets	Evidence reviewed in this assessment suggests that a re-rating of this requirement to “Fully Meets” is justified. See 4.4. for more details.
4.3.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
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 finding, 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 Actions

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

Kolomela has expanded their communication around human rights risks via sharing potential risks and findings identified during quarterly Social and human rights impact and risk analysis (SHIRA) reviews with relevant community representatives. Information is also presented during Stakeholder Day. However, interviews indicate that broader and more consistent communication on human rights is needed to ensure that all potentially affected stakeholders are adequately informed.

#### Principle 3 Outstanding Corrective Actions

##### **Critical requirement 3.1.2.1. – Workers’ Organizations and Agreements**

Kolomela implemented a Responsible Sourcing Standard for Suppliers in 2024, however surveillance audit interviews with contracted workers continue to indicate that suppliers may discourage the exercise of workers' right to freedom of association. The effectiveness of the standard therefore remains to be demonstrated.

### **Critical requirement 3.1.3.3. – Non-Discrimination and Equal Opportunity**

The mine has made significant progress on the corrective action plan from the initial audit. Mandatory training programs on the Group Policies on bullying, harassment, human rights and inclusion and diversity was introduced, and the implementation of a Living Dignity Hub for serious incidents has received positive feedback from stakeholders. Despite these advancements, worker interviews have highlighted concerns regarding the timely resolution of grievances, representation, and discrimination and intimidation of contract workers by direct employees. Further engagement will be needed to demonstrate the effectiveness of site measures to prevent and address harassment.

### **Critical requirement 3.1.5.1. – Grievance Mechanism**

Kolomela has expanded its communication related to available grievance mechanisms and available channels via promotion of the Engage app. Interviews however indicate that contract workers remain less likely to lodge grievances through established mechanisms. During interviews, several contractor employees reported a fear of reprisal from reporting grievances. Additionally, interviewed employees (both direct workers and contractors) did not always know if complaints they raised had resulted in any investigation or actions. Further engagement will be needed to demonstrate the effectiveness of the operational-level grievance mechanism.

A more comprehensive approach is required to ensure that the grievance mechanism is accessible to contracted workers.

### **Critical requirement 3.2.4.1. – Occupational Health and Safety**

The mine has completed the actions set in its corrective action plan from the initial audit, and no repeated issues were observed during the surveillance audit. However, new concerns were noted during the surveillance audit related to the mine understanding of potential risk and implementation of suitable control measures for the exposure to potentially hazardous wash water at the Heavy Equipment Shop and wash bay. Further engagement will be needed to demonstrate that mine processes are uniformly effective in addressing risks across the operation.

## 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

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.

Specific areas for follow-up, identified during the surveillance assessment, include concerns related to some contractors not respecting the rights of workers to freedom of association and collective bargaining. Some workers were reportedly without contracts, severely limiting their ability to raise grievances without fear of reprisal. The scope of the audit did not include supplier grievance mechanisms. As contractors comprise half of the mine workforce, this indicated a gap in the auditors' insight into contractor grievance practices. This topic will be further verified during the next audit cycle.

During the initial IRMA assessment, while these and other concerns were noted and discussed, the related requirements were evaluated based on the mine's performance, as related to direct employees of the mine only. Subsequent to that initial assessment, the related IRMA requirements have been interpreted as applying to all workers. Because contractors were not originally considered, the mine was not expected to develop and implement corrective actions for contractors. All related requirements will be fully re-evaluated at the next audit, considering the refined interpretation of applicability to all workers, and, due to the refined interpretation of applicability to all workers, if the concerns remain unchanged, then there is a possibility of re-rating performance downwards. This could impact the mine's overall achievement level. As mentioned above, the broader interpretation of the meaning of the terms "operating company" and "worker" has cross-cutting implications for several chapters as they related to legal compliance in Chapter 1.1 and respect for the freedom to associate in Chapter 3.1. Along with other related chapters, this will be a focus area for the next audit.

Another future focus is the potential relevance of Chapter 2.2 Free Prior Informed Consent. Whereas in the current South African context, this chapter has been marked as not relevant, the mine is aware of the fluid and evolving nature of recognition of Indigenous Peoples. Further review will be required during the next audit.

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.

# Appendix A: Revised Corrective Action Plan

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



# IRMA Surveillance Audit

Kolomela – Corrective Action Plans

November 2025

# Critical Requirement: 1.3.3.3

Requirement	Comment on progress	Corrective Action Plan
<p>Responding to actual human rights impacts related to the mining project: If the operating company determines that it has caused an actual human rights impact, the company shall:</p> <ul style="list-style-type: none"> <li>i. Cease or change the activity responsible for the impact; and</li> <li>ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually 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;</li> <li>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;</li> <li>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</li> <li>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.</li> </ul>	<p>The mine highlights implementation of a quarterly Social and human rights impact and risk analysis (SHIRA) process to identify potential risks and findings, which it shares with relevant community representatives during forums and Stakeholder Day presentations. However, surveillance audit interviews emphasize a gap in communications around human rights risks. A document prepared for Anglo American, "South Africa Security &amp; Human Rights External Context Assessment" was reviewed. This study may provide the basis for improving risk assessment communications. The rating remains Substantially Meets while this is outstanding.</p>	<p>To strengthen transparency and trust with stakeholders, this plan focuses on improving communication and feedback processes related to human rights risk management. Specific actions taken to address the finding includes, and are not limited to:</p> <ul style="list-style-type: none"> <li>Enhance communication of human rights risks identified through mechanisms such as the SHIRA process or external assessments. Continue to share feedback with community members through existing stakeholder engagement platforms at least once a year.</li> <li>By implementing these actions, we aim to ensure that stakeholders remain informed and engaged with our commitment to addressing human rights risks proactively and responsibly.</li> </ul>

# Critical Requirement: 3.1.2.1

Requirement	Comment on progress	Corrective Action Plan
<p>The operating company shall respect the rights of workers to freedom of association and collective bargaining..</p>	<p>During the initial IRMA assessment, while these and other concerns were noted and discussed, the related requirements were evaluated based on the mine's performance, as related to direct employees of the mine only. Subsequent to that initial assessment, the related IRMA requirements have been interpreted as applying to all workers. As this could not have been communicated to the mine at the time, the mine was not expected to develop and implement corrective actions. See Section 3.7. for more details. Consequently, the critical requirement related to these issues have not been re-rated at this time and remains rated as Substantially Meets.</p>	<p>Continue to engage with recognized Unions in South Africa. Continue to ensure accessibility, awareness, and trust around grievance mechanisms available to both employees and contractors through training and engagement</p>

## Critical Requirement: 3.1.3.3

Requirement	Comment on progress	Corrective Action Plan
<p>The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.</p>	<p>The mine has rolled out enhanced and mandatory training and communications programs on Bullying, Victimization and Harassment and the implementation of a Living with Dignity Hub for addressing serious incidents. Implementation of the Living with Dignity Hub has received some positive comments from internal stakeholders for its ability to manage serious incidents of harassment and intimidation effectively and anonymously. However, other stakeholders raised concerns regarding the length of time taken to reach resolution and the inability to represent workers in this process. These factors may reduce Living with Dignity Hub usage, especially by contract workers. Surveillance audit interviews continue to indicate that discrimination and intimidation of contract workers by direct employees remains a persistent issue requiring ongoing attention. With these outstanding and persistent issues, this requirement remains at a rating of Substantially Meets</p>	<p>To foster a respectful and inclusive workplace culture, Kumba will continue to raise awareness of grievance mechanisms and reinforcing training on bullying, victimization, and harassment (BHV) prevention. Specific actions include and are not limited to:</p> <ul style="list-style-type: none"> <li>• Conduct at least one awareness-raising session annually for employees and contractors on platforms available for lodging and raising a grievance, such as the Living with Dignity Hub.</li> <li>• Continue providing Bullying, Victimization, and Harassment training.</li> <li>• Communicate high-level, sanitized results to employees and contractors.</li> </ul> <p>Through these measures, we aim to continue to ensure that all employees and contractors feel empowered to raise concerns safely, understand available support channels, and trust in our commitment to maintaining a dignified and respectful work environment.</p>

# Critical Requirement: 3.1.5.1

Requirement	Comment on progress	Corrective Action Plan
<p>The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <p>a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;</p> <p>b. Shall allow for anonymous complaints to be raised and addressed;</p> <p>c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and</p> <p>d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements</p>	<p>The mine has rolled out mandatory training and an Engage poster campaign to highlight available grievance mechanisms and how to use them. Mention of the Living with Dignity Hub is also included in training. However, surveillance audit interviews continue to indicate that contract workers are much less likely to lodge grievances through established mechanisms and procedures. This is especially true for contracted workers that report being employed without a signed contract. To date, the scope of audit process has precluded investigation of supplier grievance mechanisms, procedures and their usage. As mentioned earlier, given that roughly half of the Kolomela Mine workforce are contract workers, this is an area requiring further investigation and monitoring, prior to and during the next audit. This requirement remains rated as Substantially Meets</p>	<p>To foster a respectful and inclusive workplace culture, Kumba will continue to raise awareness of grievance mechanisms and reinforcing training on bullying, victimization, and harassment (BHV) prevention. Specific actions include and are not limited to:</p> <ul style="list-style-type: none"> <li>• Conduct at least one awareness-raising session annually for employees and contractors on platforms available for lodging and raising a grievance, such as the Living with Dignity Hub.</li> <li>• Continue providing Bullying, Victimization, and Harassment training.</li> <li>• Communicate high-level, sanitized results to employees and contractors.</li> </ul> <p>Through these measures, we aim to continue to ensure that all employees and contractors feel empowered to raise concerns safely, understand available support channels, and trust in our commitment to maintaining a dignified and respectful work environment.</p>

# Critical Requirement: 3.2.4.1

Requirement	Comment on Progress	Corrective Action Plan
<p>The operating company shall implement measures to protect the safety and health of workers including:</p> <p>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;</p> <p>b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;</p> <p>c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;</p> <p>d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;</p> <p>e. Providing adequate supervision and control on each shift; and</p> <p>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground</p>	<p>Kolomela Mine has addressed all of the gaps identified in the previous audit. The high-risk work procedure was re-communicated to employees, and the digitization of Work Execution Documents (WEDs) and job cards has been implemented to prevent tasks from being executed without proper documentation. Personal Protective Equipment (PPE) protocols were reviewed and updated, and interviews during this surveillance confirmed that PPE continues to be provided at no cost to workers, with no new complaints raised. Training on hazard awareness and control measures has been integrated into safety induction and refresher programs, and records are maintained via Passport 360. Supervisory oversight has improved through the Visible Felt Leadership (VFL) system, which tracks weekly engagement hours. No similar issues regarding lack of supervision or missing Job Risk Assessments (JRA) were observed during this audit, indicating that corrective actions have been effective.</p> <p>New concerns noted during the surveillance audit, were related to the mine's understanding of potential risk and implementation of suitable control measures, such as improved PPE, to address exposure to potentially hazardous wash water at the Heavy Equipment Shop and wash bay (see Section 4. 3.2). Consequently, the rating of Substantially Meets is still considered appropriate for this critical requirement</p>	<p>Kolomela Mine operational excellence and uphold environmental and safety standards, this plan focuses on strengthening oversight and monitoring processes at Kolomela Mine</p> <p>To ensure operational integrity and reinforce leadership accountability, Kolomela Mine aims to continue environmental monitoring and visible leadership engagements. Specific actions include, and are not limited to:</p> <ul style="list-style-type: none"> <li>• Continue monitoring water quality through the existing water quality monitoring network at Kolomela Mine.</li> <li>• Continue to implement Visible Felt Leadership process to ensure oversight of management routines.</li> </ul> <p>By continuing these practices, Kolomela Mine aims to safeguard environmental standards, enhance management oversight, and promote a culture of responsibility and continuous improvement</p>