

IRMA SURVEILLANCE ASSESSMENT PUBLIC REPORT

MINE SITE

Sishen

OPERATING COMPANY

Anglo American

COUNTRY OF OPERATION

South Africa

12 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 Sishen workers, governmental representatives, and members of affected communities for their participation in this audit.

Table of Contents

Acknowledgements.....	2
Table of Contents	3
Audit Details.....	6
1. Mine Site Overview.....	7
1.1. Overview of location.....	7
1.2. Overview of operation.....	11
1.2.1. Scope of activities and facilities included in audit.....	13
1.2.2. Activities or facilities excluded from scope of audit.....	13
1.2.3. Limitations of audit.....	13
2. Mine Site Assessment Process	14
2.1. Overview of IRMA Process.....	14
2.1.1. Scope and Limitation of Audits.....	15
2.1.2. IRMA Complaints Process.....	16
2.2. Surveillance Audit Process.....	16
2.3. Stakeholder Engagement	16
2.3.1. Written comments/inquiries.....	16
2.3.2. Mine Staff.....	17
2.3.3. Workers/Contractors.....	18
2.3.4. Government Agencies and Non-Governmental Organizations.....	19
2.4. Summary of Mine Facilities Visited	21
3. Summary of General Scope Items	22
3.1. General operational status.....	22
3.1.1. General outcome of compliance monitoring/audits.....	22
3.1.2. Regulatory inspections, violations, enforcement actions.....	22
3.1.3. Lawsuits and other external legal, non-regulatory actions.....	22
3.2. Stakeholder considerations.....	23
3.2.1. Stakeholder feedback/complaints received by site since prior audit	23
3.2.2. Stakeholder feedback/complaints received by auditors/IRMA since prior audit.....	24
3.3. Summary of Material Operational or Administrative Changes Since Previous Audit.....	24
3.4. Site-Specific Issues Identified for Follow-Up in Previous Audit.....	25
3.5. Progress on Previous Corrective Actions	25
3.6. Notable Performance Improvements.....	43
3.7. Concerns Related to Continued Maintenance of Achievement Level	44

4. General Performance by IRMA Standard Principle and Chapter	46
4.1. Principle 1: Business Integrity.....	46
Chapter 1.1—Legal Compliance.....	46
Chapter 1.2—Community and Stakeholder Engagement.....	46
Chapter 1.3—Human Rights Due Diligence.....	47
Chapter 1.4—Complaints Mechanism/Access to Remedy.....	48
Chapter 1.5—Revenue and Payments Transparency.....	48
4.2. Principle 2: Planning for Positive Legacies.....	49
Chapter 2.1—Env/Soc Impact Assessment and Management.....	49
Chapter 2.2—Free, Prior and Informed Consent.....	49
Chapter 2.3—Community Support and Benefits.....	50
Chapter 2.4—Resettlement.....	51
Chapter 2.5—Emergency Preparedness and Response.....	53
Chapter 2.6—Planning/Financing Reclamation & Closure.....	54
4.3. Principle 3: Social Responsibility.....	55
Chapter 3.1—Fair Labor and Terms of Work.....	55
Chapter 3.2—Occupational Health and Safety.....	56
Chapter 3.3—Community Health and Safety.....	57
Chapter 3.4—Conflict-Affected and High-Risk Areas.....	58
Chapter 3.5—Security Arrangements.....	58
Chapter 3.6—Artisanal and Small-Scale Mining.....	59
Chapter 3.7—Cultural Heritage.....	59
4.4. Principle 4: Environmental Responsibility.....	59
Chapter 4.1—Waste and Materials Management.....	59
Chapter 4.2—Water Management.....	61
Chapter 4.3—Air Quality.....	62
Chapter 4.4—Noise and Vibration.....	63
Chapter 4.5—Greenhouse Gas Emissions.....	64
Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas.....	65
Chapter 4.7—Cyanide Management.....	66
Chapter 4.8—Mercury Management.....	66
5. Performance on Critical Requirements	67
5.1. Summary of Site Performance Changes in Critical Requirements.....	67
6. Next Steps	71
6.1. Corrective Action Plans.....	71
Principle 1 Outstanding Corrective Action.....	71
Principle 3 Outstanding Corrective Actions.....	72
Principle 4 Outstanding Corrective Actions.....	72

6.2. Timing of Future Audits73
6.3. Focus Areas for Next Audit.....73
Appendix A: Revised Corrective Action Plans..... 75

Audit Details

Name of Mine:	Anglo American Sishen
Operating Company:	Kumba Iron Ore
Mine Owner:	Anglo American
Country of Operation:	South Africa
Mined Material(s):	Iron Ore
# Employees / contractors:	3,713 employees and 3,555 contractors at the time of audit
Mine site profile on IRMA's Responsible Mining Map:	https://responsiblemining.net/sishen
Audit Type:	Surveillance Audit
Audit Dates:	Desktop review: 8 July 2025, 15 Oct 2025 Onsite audit: 22-24 October 2025
Audit Firm:	ERM CVS
Audit Team:	Lead/EHS Assessor (1) EHS Assessor (1) Social Assessor (1) Social Support/Translator (2)
Audit Firm Declaration:	<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>
Scope of Audit	The scope of this IRMA Assessment is for the Sishen Iron Ore Mine, including 13 active open pits, 24 waste rock dumps including stockpiles, four tailings' facilities, a beneficiation plant, and ancillary infrastructure
IRMA Achievement Level:	IRMA 75
Achievement Decision Date:	26 March 2024
Achievement Level Expiration Date:	26 March 2027
Authorized Representative:	Glenn Keays, ERM CVS, Director, Operations (Mining)
Representative Signature	
IRMA Reference Number:	IRMA-00150-STD01.0-01-SRV OLD: IRMA-STD-ERM-001-V-3454.IRMA1

1. Mine Site Overview

1.1. Overview of location

Sishen Mine is located within the Gamagara Local Municipality, in Northern Cape Province, South Africa. The mine is surrounded by agricultural land and land used for game farming, and the town of Kathu. While the Kathu town center is approximately 6 km from the Mine, there is a residential area of Kathu known as Sesheng, located adjacent to the northeast mine boundary,

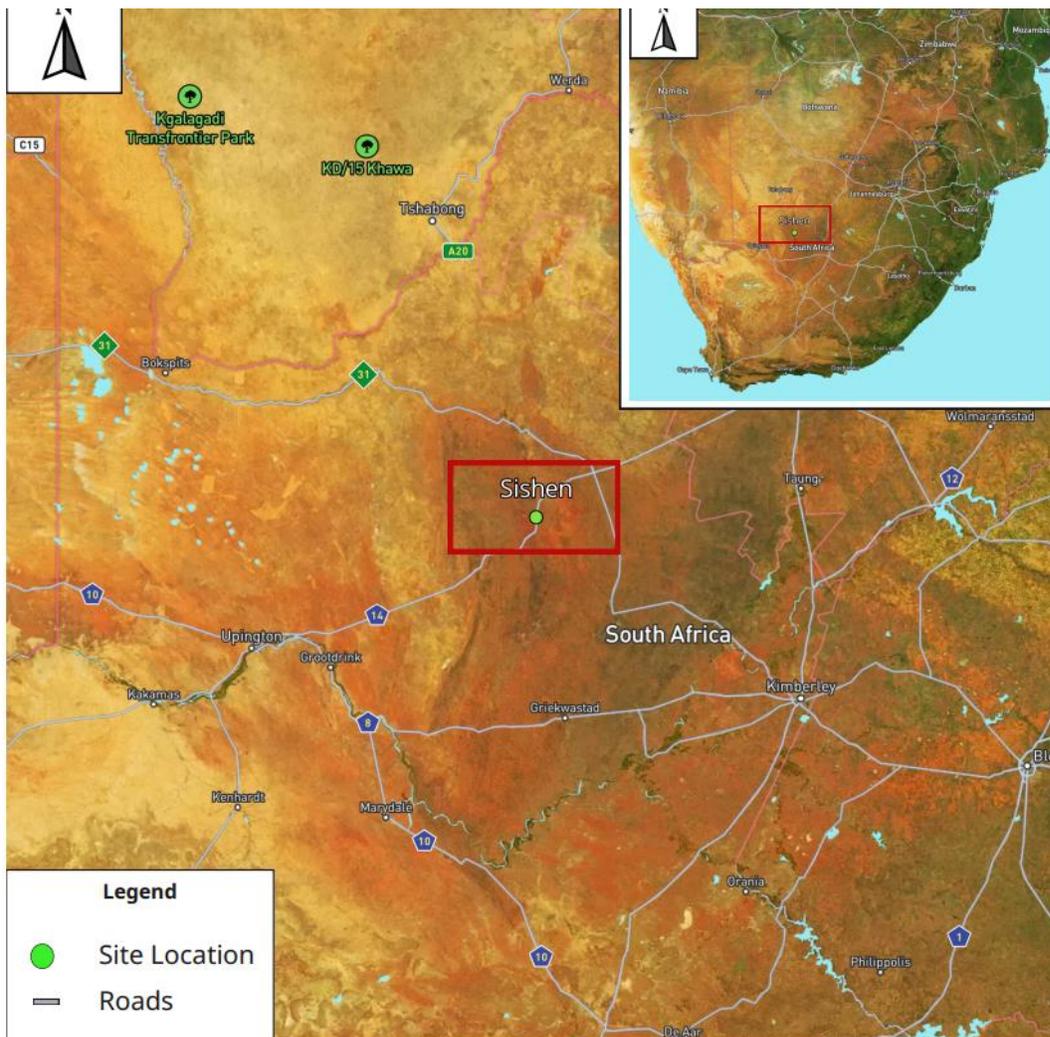


Figure 1: Global Location of Site

and comprised of mine houses. Kathu has a population of approximately 64 864 people (2022). Figure 1 provides a general map indicating the global location of the mine site.

The small town of Dingleton (population of about 3 500 people in 2011) was previously located adjacent to the western boundary of the Sishen Mine. Due to the proximity to the Mine, and plans to expand the Sishen Mine, Anglo American undertook a process to relocate the community. Between 2015 and 2021, Sishen relocated the 518 households from Dingleton to a newly established suburb of Kathu named Siyathemba.

There is a low-income settlement known as Mapoteng adjacent to Sesheng and the Mine along the northeast mine boundary. Mapoteng consists of informal homes and government provided homes, known as the (Reconstruction and Development Program (RDPs) houses.

The town of Kimberley, approximately 200 km southeast of Sishen, is the nearest economic hub, with a population of 225,160 (2011). The small town of Kuruman (13,057 people in 2011) is 50 km northeast of the Mine.

Sishen Mine is situated in the Kalahari Desert within the Savanna Biome, the largest biome within southern Africa. Savanna is characterized by a grassy ground layer and a distinct upper layer of woody plants. Camel Thorn trees (*Acacia erioloba*) occur around the Sishen Mine. The region is semi-arid, with most rainfall occurring during the summer months (October to March). The average annual rainfall for the broader province is around 360 mm, significantly lower than the South African average of 464 mm. Generally it is a low precipitation area with high evaporation rates. There are no perennial rivers in the area. The Gamagara River, located on the southern border of the site, is ephemeral and only flows after heavy rains in the catchment.

Before the Sishen mine opened in the 1950s, the region's economy included subsistence activities and limited agriculture, characteristic of the arid Kalahari region, alongside early forms of indigenous mining. The establishment of the mine transformed the area into a major industrial hub, with the town of Kathu founded specifically to support mining operations..

Figures 2 and 3 provide a regional map of the mine site location.

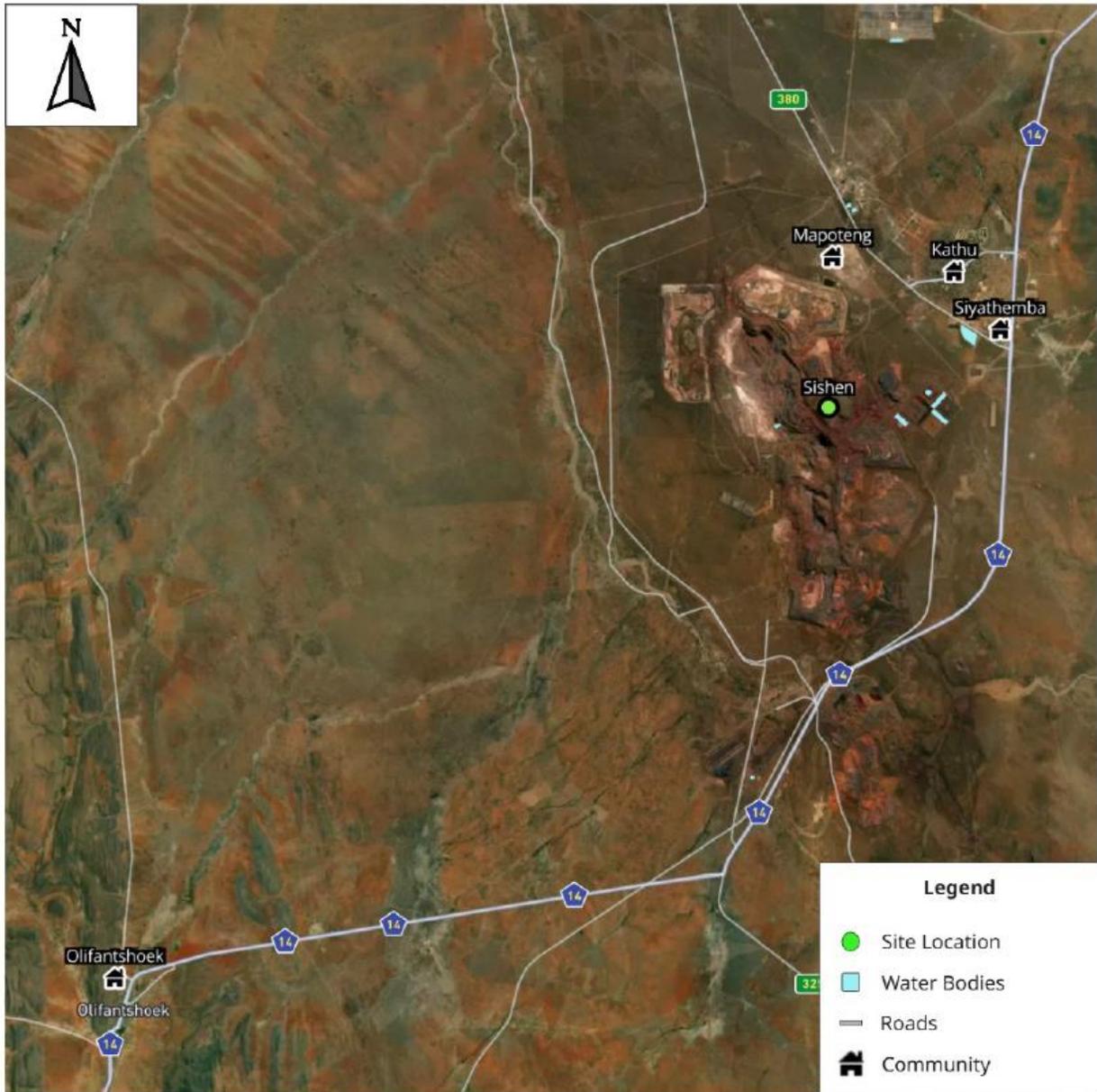


Figure 1: Regional Location of Site - West of mine



Figure 3: Regional Location of Site - East of mine

1.2. Overview of operation

Sishen Mine is the largest mining operation of Kumba Iron Ore (majority-owned by Anglo American) and is one of the world's largest open-pit iron ore mines, producing iron ore for global export. The mine was opened in 1947, and its current life of mine is 2040. The planned ultra-high-dense-media-separation (UHDMS) plant has the potential to extend the life of mine to 2044.

The mine employs large-scale, conventional opencast (open pit) mining methods involving drilling, blasting, and truck and shovel operation. The mine has three main, interconnected, pits, creating a combined excavation almost 12Km long. Distinctive mining areas are called the North Mine, Middle Mine, Dagbreek, Vliegveld, Far South, and Lyleveld.

Mined ore is transported to an on-site beneficiation plant. The primary processing activities include crushing, screening, and beneficiation using both dense media separation (DMS) and jig technology.

The process produces iron ore of various specifications, with high-grade hematite ore as the primary product. The bulk of the iron ore is transported via a dedicated rail link (owned and operated by state-owned entity Transnet) to the port of Saldanha Bay for export. On-site waste management operations involve the placement of waste rock and low-grade material on several managed dumps around the pit. The tailings facilities include Slimes Dam, East Protea Slimes Dam, and Slimes Dam West, which all have a water holding capacity greater than 50,000 cubic meters and walls greater than 5 meters in height. The tailings facilities were constructed using the upstream method of construction. There is also a waste management facility for hazardous and non-hazardous waste and a non-hazardous waste landfill.

On-site maintenance facilities service the mine's large fleet of haul trucks, shovels and other supporting equipment, and support the beneficiation plants and other essential infrastructure.

In 2024, Kumba underwent reorganization and optimization of its operations and reduction of mining volumes and production. The mine operates 24 hours a day, seven days a week. At the time of the audit, the mine had approximately 3,713 direct workers and employed 3,555 contractors, which was a reduction of 3,347 compared to the initial audit (876 employees, 2,471 contractors). The primary languages spoken by workers are English, Setswana, and Afrikaans.

Figure 4 presents the physical configuration of site operations.

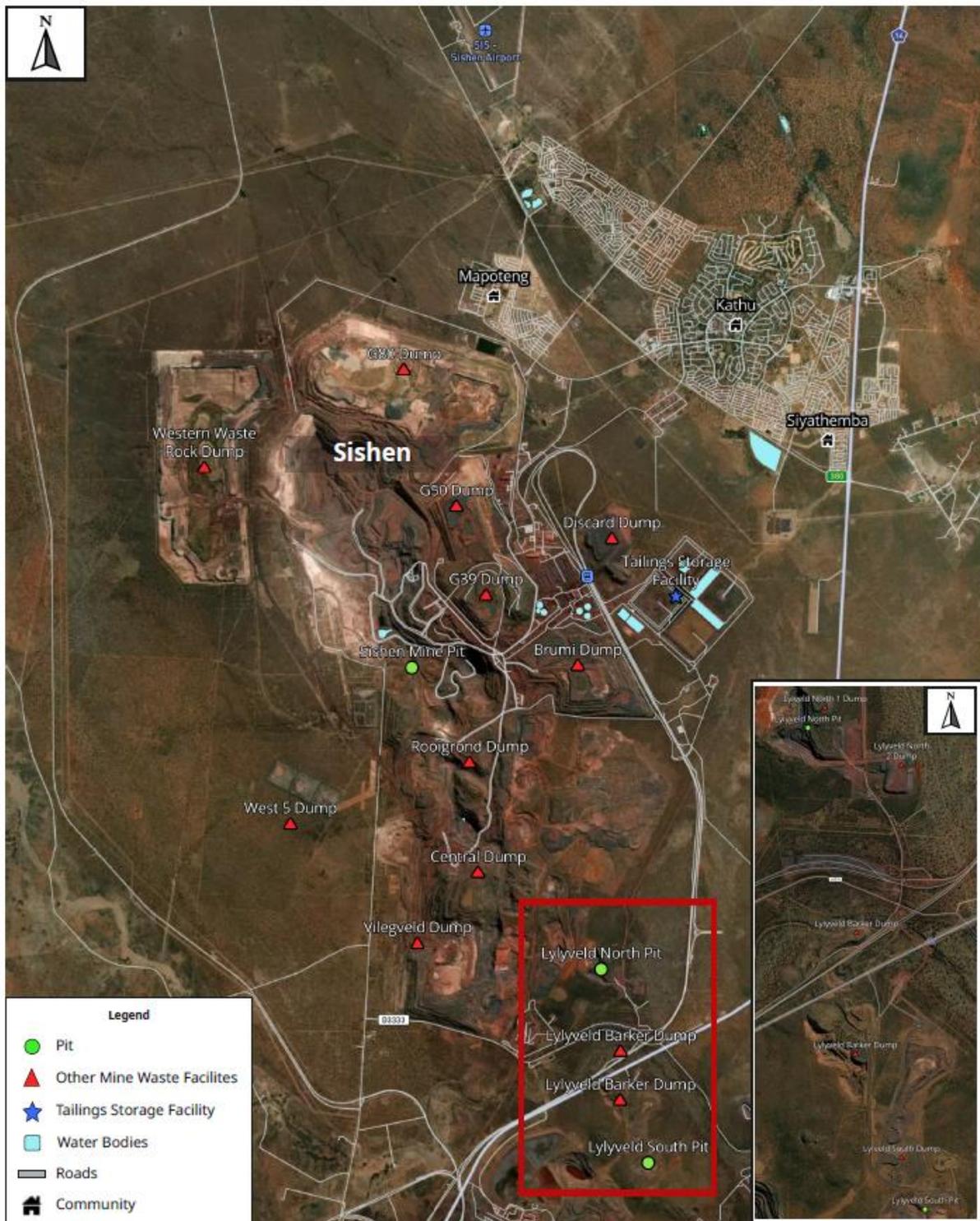


Figure 4: Layout of Site Operations

1.2.1. Scope of activities and facilities included in audit

The scope of this IRMA Assessment is for the Sishen Iron Ore Mine, including:

- 13 Open pits
- Crush/convey and beneficiation plants
- Waste rock dumps including stockpiles
- Four tailings storage facilities
- Maintenance and storage facilities
- Other ancillary infrastructure and supporting activities, including administration, offices and workshops.

1.2.2. Activities or facilities excluded from scope of audit

The Sishen Ultra High Dense Medium Separation (UHDMS) also known as Project Koketso, which is replacing the DMS plant, was excluded from the scope of the surveillance audit. It began construction in January 2025 and was still under construction during the onsite visit. The main integration phase is expected in 2026 and will be included in the scope of the audit after its completion.

1.2.3. Limitations of audit

The audit team experienced some minor challenges with availability of worker interviewees, requiring the team to adapt the audit plan in order to complete all scheduled interviews. Worker interviews included a higher proportion of group interviews than originally planned, however the scheduled interviews were also supplemented by a large number of individual impromptu interviews during site walkarounds.

With cooperation from mine personnel, the audit team was able to observe a suitable sample of on site operational areas and activities (see description in Section 2.4) to accomplish the aims of the audit.

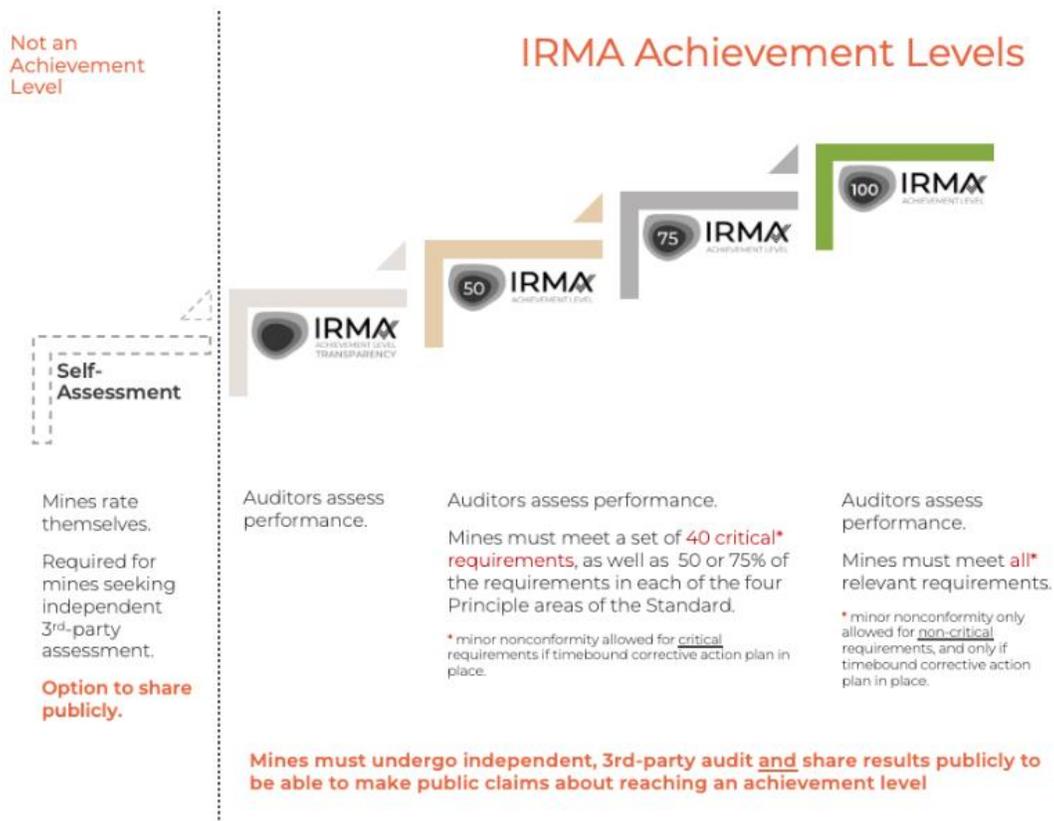
Some of the external stakeholders only requested participation in the surveillance audit a few weeks or days prior. However, the social auditor was able to talk to all of those who expressed interest in participating, even if not face-to-face. Additionally, a few interviewees were not able to make the planned meetings, for a variety of reasons (see Section 2 for more details).

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 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, documentation review, and visits to operational areas, surrounding area, and other locations including surrounding communities.

2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Stakeholder engagement included interviews with workers, independently selected by the audit team, and external community-based individuals, groups, organizations and government representatives, referenced below.

Audits are announced by IRMA and the mine, 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 Sishen 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 audit announcement process resulted in interest in participating in the Sishen surveillance audit by a representative of Indigenous First Nation Advocacy South Africa (IFNASA). A virtual interview during the audit period was arranged, as well as in-person interviews with local self-identified Indigenous leaders in the mine area.

During execution of the surveillance audit stakeholder engagement plan, the social auditor worked with the mine to facilitate participation by selected stakeholders. The ten (10) participants represent a cross-section of stakeholders from the Mine’s area of influence that included a municipal government leader and manager, a resettled community leader, individuals representing self-identified Indigenous groups and local agricultural and business forum participants.

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.

Principal Mineral Rights and Permitting	Principal Security & Intelligence
Principal Risk and Assurance	Specialist Carbon Neutrality & Energy
Specialist Risk & Compliance	Section Manager: Environmental
Specialist Mineral Rights & Permitting	Principal Environment and Land Management
Community Liaison Officer	Specialist: Sustainability Integration
Section Manager Hygiene	Environmental Advisor
Principal Employee Relations	Principal: Sustainability Reporting and Disclosure
Principal Talent and Org Effectiveness	Specialist: Social Performance
ER Advisor	Principal: Social Impact and Sustainability
Specialist Social Risk & Impact	Specialist: Community Liaison
Mine Closure and Rehab Advisor	Specialist: Sustainability Integration and LADAR
Section Manager Security	Specialist Hydrogeologist

2.3.3. Workers/Contractors

During the surveillance audit, ERM CVS conducted a total of 45 scheduled worker engagements, including 13 individual interviews, and 7 group interviews (2-7 people). Scheduled interviews included a total of 46 workers, including one representative from local union (Solidarity Union).

Scheduled worker interviews were supplemented by 19 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, 65 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 3,713 direct employees and 3,555 contractors (total 7,268 workers). The selection aimed to ensure diversity in age, gender, length of service at the Sishen mine and role or function (including managers, coordinators, technicians, and machine operators).

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, 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.

Date	Meeting Type	Number of Attendees	Notes
22 October 2025	Individual Interview	1M	Direct employee, Processing
22 October 2025	Individual Interview	1M	Contractor
22 October 2025	Individual Interview	1M	Contractor
22 October 2025	Group Interview	5M	Direct employees, Operations

22 October 2025	Group Interview	3M	Contractors, Mechanics
22 October 2025	Group Interview	4F, 1M	Contractors
22 October 2025	Group Interview	2F	Direct employees, Mine infrastructure
22 October 2025	Group Interview	6F	Operations
22 October 2025	Group Interview	1M, 5F	Direct employees, Mine infrastructure
22 October 2025	Group Interview	2F, 5M	Contractors
22 October 2025	Individual Interview	1F	Contractor
22 October 2025	Individual Interview	1M	Contractor, mining
22 October 2025	Individual Interview	1M	Solidarity Union representative
23 October 2025	Individual Interview	1M	Direct employee
23 October 2025	Individual Interview	1F	Contractor, SHE
23 October 2025	Individual Interview	1F	Contractor
23 October 2025	Individual Interview	1F	Contractor, Mine infrastructure
23 October 2025	Individual Interview	1F	Contractor, non-mining
23 October 2025	Individual Interview	1F	Contractor, controller
22-23 October 2025	Impromptu interviews	19	Conducted during site walkarounds in various areas
Total	65 workers:		
	46 Scheduled interviews (21M, 25F)		
	19 impromptu interviews		

2.3.4. Government Agencies and Non-Governmental Organizations

To review progress since the initial audit, surveillance audit engagement with government agencies included the Municipal Manager of the Gamagara municipality, as well as the mayor. Interview themes included progress on Social Labour Plan infrastructure projects and changes to the Mining Code which allow for enhanced community participation in Social Labour Plan consultations. Discussions also included the ongoing considerations and issues related to the Dingleton community resettlement to Siyathemba with the Mayor, who also sits as the ward councilor for Dingleton.

Date	Government Institution	Location of Meeting	Total Number of Attendees
23 October 2025	Municipal Manager, Gamagara Municipality	Virtual	1 M
24 October 2025	Mayor, Gamagara Municipality, Ward Councilor, Dingleton	Gamagara Municipal Building, Kathu	1M
Total			2M

Self-identified Indigenous and civil society representatives were included in surveillance audit interviews.

Date	Community, NGO Name	Location of Meeting	Total Number of Attendees
22 October 2025	Korana First Nation representative	Namakwari Lodge, Kathu	1M
22 October 2025	JTG Agri Forum representatives	Namakwari Lodge, Kathu	2M
22 October 2025	Representative of Siyathemba Post-resettlement group	Namakwari Lodge, Kathu	1M
22 October 2025	JTG Business Forum representative	Namakwari Lodge, Kathu	1M
23 October 2025	Indigenous First Nation Advocacy South Africa (IFNASA) representative	Virtual	1M
24 October 2025	Self-identified Indigenous group leader and community member	Gamagara Municipal Building, Kathu	2M
Total			8M

2.4. Summary of Mine Facilities Visited

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

Operational areas	Sishen Pit Traffic Management & Haul Road Management Crane Workshops Manufacturing & Fabrication Workshops Water Management Dams Waste Management Areas Sishen Landfill JIG Plant Manufacturing & Fabrication Oil storage Facility
Non-operational areas visited	Sishen Medical Centre SIVOS Training Accommodations Slope Stability Monitoring Stations Air Quality Monitoring Stations
Surrounding Communities	Camagara Municipal Building, Kathu

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

Compliance audits have been undertaken periodically (approximately biannually, based on provided reports) and reports conclude that processes are mature and effective in preventing and addressing permitting gaps.

During the assessment, the auditors reviewed the following compliance-related records, which demonstrated the mine's compliance performance:

- KIO "Your Voice" reporting dashboard
- Permitting review and gap analysis report (2024)
- Permit compliance audit report (2022)
- Sishen Mine Permitting Compliance Report (2023)
- Compliance audit status spreadsheet

3.1.2. Regulatory inspections, violations, enforcement actions

The mine receives regular visits from South Africa's Department of Mineral Resources and Energy (DMRE). The mine reported no fines for non-compliance during the years 2023, 2024, and 2025, at the time of the surveillance audit.

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

As of October 2025, there are no specific lawsuits or non-regulatory actions currently reported as being directly filed against the Sishen Mine itself, and the mine is not engaged in any significant legal action.

On March 5, 2025, the South African Supreme Court of Appeal (SCA) issued a significant tax ruling in the case of Sishen Iron Ore Company (Pty) Ltd v

CSARS. The court ruled in favor of the mining company, determining that certain capital expenditures were tax-deductible. This overturned a prior Tax Court decision.

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

Sishen Mine achieved over nine years of fatality-free performance as of the surveillance audit in October 2025. The company has seen a general downward trend in injury rates.

Sishen mine operates with environmental, and occupational health and safety management systems certified to ISO 14001 and ISO 45001. Maintenance of these certifications requires that the mine has functioning compliance management systems and be checking and improving their performance.

Despite the strong overall performance, the company continuously identifies and manages principal safety risks, which primarily relate to transportation, moving machinery, working at heights, electrical incidents, and the release of stored energy. Low-level incidents, often finger injuries and slips, trips, and falls, account for most minor injuries.

3.2. Stakeholder considerations

3.2.1. Stakeholder feedback/complaints received by site since prior audit

In 2025, there were 50 grievances logged as of the date of the surveillance audit. In 2024, a total of 42 grievances were logged. Of the grievance reviewed, a vast majority focused on issues around unpaid or unfair compensation for services rendered. One grievance noted repeated access, property damage and theft by unknown parties to a property adjacent to the KIO mine concession. From this review, the audit team concluded that available external grievance mechanisms are generally utilized for one purpose: potential re-imburement. While grievances are reviewed and generally resolved by the mine, the relatively low number of grievances may not be an indicator of process effectiveness.

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

No stakeholder feedback was received by the auditors following the initial audit or prior to or during 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:

- Significant changes at the Sishen mine during 2023-2025 have focused on cost optimization, operational reconfiguration, and major capital projects, most notably the Ultra-High Dense Media Separation technology (Koketso Project) The Koketso UHDMS Project represents a major investment. This project, with the main integration phase expected in 2026, involves converting the dense-media-separation (DMS) processing plant at Sishen to UHDMS technology. Upon completion, this project should increase the proportion of premium iron ore product supporting Kumba's "green steel" initiative by reducing carbon emissions for downstream customers.
- Kumba Iron Ore (Sishen's parent company) implemented a general reorganization and business optimization in 2023, which led to/aligned with the above projects. This also led to managing Sishen and Kolomela mines as an integrated complex, allowing Kumba to be flexible with production schedules between the two operations to manage costs and production targets and logistical limitations with the rail transport of ore to Saldanha port.
- In March 2024, the mine entered consultation with trade unions. The process concluded in May 2024 with a new structure finalized. As a result, the National Union of Metalworkers of South Africa (NUMSA) received recognition for the members it represents at the Mine.
- Waste Management: The commissioning of a western waste dump at Sishen has shortened haul roads, leading to material reductions in diesel usage and contributing to cost savings.
- Bulk earthworks for a planned 63 MW solar photovoltaic (PV) plant at Sishen were completed in mid-2025, with construction expected to

finish by the end of 2026. This project aims to reduce the mine's Scope 2 carbon emissions by estimated 33%.

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

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

- Review of Indigenous Peoples Scoping Report and engagement with traditional leaders identifying as representatives of Korana First Nation (Chapter 2.2.)
- Continued maintenance of accident insurance coverage (Requirement 2.5.3.3)
- Financial surety instruments and status of the shortfall against the estimated closure cost (Requirement 2.6.4.1.)
- Implementation of the Kumba Iron Ore Adaptive Water Management Standard, Sishen Mine Adaptive Water Management Plan, and the Integrated Water and Waste Management Plan. (Requirement 4.2.4.4)

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	The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: Providing relevant information to stakeholders in a timely manner;
--------------------	---

Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;
 Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;
 Soliciting feedback from stakeholders on issues relevant to them; and
 Providing stakeholders with feedback on how the company has taken their input into account.

Critical

Yes

Rating from previous report

Substantially meets

Justification from previous report

The site has in place a Stakeholder Engagement Plan. The Stakeholder Engagement Plan, together with other evidence presented indicates that regular timely engagement is taking place.

A. Evidence provided demonstrates attempts to engage stakeholders regularly and provide timely information (e.g., regular blasting notifications); however, some stakeholders expressed that the Mine is slow to provide feedback on issues raised.

B. During the annual stakeholder day presentations, cross functional teams, and Small and Medium Sized Enterprise share feedback with stakeholders to address specific topics.

C. Engagement is primarily conducted in English; however, site representatives noted that required translation services are provided. There was no evidence of manipulation or interference in the engagement process.

D. The stakeholder perception survey, scope of work and previous surveys show the site is soliciting feedback from stakeholders.

E. During interviews, stakeholders noted that they did not know how, or whether, their input is taken into consideration by the mine, and there was a sense that some stakeholders felt they were not being heard.

Planned Corrective Action(s) from previous report

Sishen Mine fosters two-way dialogue and meaningful engagement with stakeholders in a number of ways. Sishen 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 (e) with defined timelines. These actions will be captured in our management systems action tracker module

Comments on Progress

The Mine has implemented an improved process for tracking, responding to and reporting on stakeholder feedback (stakeholder database; engagement reports; close-out reports; stakeholder

engagement presentations). Stakeholder interviews conducted during surveillance audit included a range of stakeholder groups and individuals. The interviews confirm regular engagement is taking place with interested parties through Stakeholder Day presentations, forums and ongoing Social Labour Plan discussions. Some forums would appear to be more effective than others (participants in Environmental Forums at both Sishen and Kolomela appreciated ongoing communications). Participants in other business and unemployment forums reflected the transactional nature of communications with the mine and the limited local contracting and employment opportunities for local residents and businesses. Grievances mechanisms are used primarily to address contracting or outstanding compensation issues. The Mine reports back to community members on feedback received during Stakeholder Days and other forums mentioned, (i.e. the environmental forum) and provided evidence for how feedback has been considered in mine planning and operations. As a result, the rating for this requirement has been changed to Fully Meets.

Requirement # 1.3.3.3

Requirement	<p>Responding to actual human rights impacts related to the mining project:</p> <ul style="list-style-type: none">a. a. If the operating company determines that it has caused an actual human rights impact, the company shall:<ul style="list-style-type: none">i. Cease or change the activity responsible for the impact; andii. 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 rightsholders;b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; andd. 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 Due Diligence Report, Social Management Plan and updated Social and Human Rights Impact and Risk Analysis indicate several actual and potential human rights impacts and measures to mitigate these impacts. Induction training, anti-harassment training, a grievance mechanism and register provided indicate specific efforts to address potential human rights infringements and prevent future infringement. A progress report on social-labour initiatives touches on potential human rights issues to which the mine may contribute (e.g., lack of housing). The updated Baseline and a Human Rights Due Diligence Scope of Work provided but not completed at the time of the audit indicate ongoing efforts to address human rights impacts, including stakeholder participation. However, community and worker interviews raised potential issues regarding the effectiveness of mitigation measures implemented to date (i.e. harassment and bullying; the freedom of association for contracted workers).

Planned Corrective Action(s) from previous report

Sishen 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. Sishen Mine will also, where applicable, include the mitigation measures and human right impacts identified in the Social Management Plan.

Comments on Progress

A Sishen Human Due Diligence Report was commissioned in March 2023 but was not provided for review. Evidence was also not presented during the surveillance audit that a proposed case studies approach had been implemented.

Surveillance audit stakeholder interviews did not indicate the use of grievance mechanisms to raise human rights complaints or issues. While the mine undertakes quarterly SHIRA exercises and discusses human rights issues during Stakeholder Days and other forums, the identified High and Significant impacts indicate a continuing gap in programming to be reviewed during the next audit review. Interviews with contracted workers also continue to highlight the perceived discrimination and intimidation present in the employee – contract worker dynamic.

This requirement remains rated as Substantially Meets.

Requirement # 1.4.1.1

Requirement The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.

Critical Yes

Rating from previous report Substantially Meets

Justification from previous report The site is guided by corporate level policies that require Anglo American mines to develop and implement an external grievance mechanism. The site has in place a Social Incidents and Grievance Procedure, implemented in 2019 and updated in 2020.
Evidence provided shows that information around how to access the grievance mechanism is broadly shared. Stakeholders, however, reported that the Engage App is not accessible to all stakeholders as many people do not have smartphones, access to Wi-Fi or data.

Planned Corrective Action(s) from previous report Sishen Mine will review the Incidents and grievance procedure to address the Engage App shortcomings identified.

Comments on Progress The Mine has reviewed the grievance mechanism. Sishen grievance logs from 2023 – 2025 were reviewed during the surveillance audit, as well as a conflict analysis undertaken in May 2025 after a community protest march on the mine’s gate. Many of the grievances logged during this period focus on employment or contract review related issues. Stakeholder interviews confirm ongoing community concerns over lack of transparency in contract awarding process, perceived inadequacy in employment opportunities and allegations of corruption. Evidence provided indicates a functioning grievance process, that is used sparingly by a narrow stakeholder group (employment candidates and contractors). While the grievance process was reviewed, a gap remains between high risks identified by the mine related to unaddressed community expectations and an effective grievance resolution process that addresses the range of issues and concerns raised. The narrow and low risk focus of most grievances submitted may indicate design and/or communications

gaps in the process. This requirement remains rated as Substantially Meets. See Sections 3.7. and 6.3 for more detail.

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 has developed an Emergency Preparedness and Response Plan and an Emergency Preparedness Response Plan specific to the Tailings Facility. Recent Agricultural Forum Meeting Minutes show that the Emergency Preparedness Response Plan is discussed with neighboring landowners and stakeholders. Emergency Response Plans are prepared in conformance with the Anglo American Social Way. Review of the Emergency Response Plan found conformance to the guidelines set forth in the United Nations Environment Program, Awareness and Preparedness for Emergencies at the Local Level (UNEP APELL). However, it is unclear to what extent, if any, the process outlined in the United Nations Environment Program, Awareness and Preparedness for Emergencies at the Local Level (UNEP APELL) has been reviewed by the site

Planned Corrective Action(s) from previous report Sishen 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.

Critical Yes

Rating from previous report Substantially meets

Justification from previous report A percentage of the closure liability provision for the site falls under the Kumba Rehabilitation Trust. The site has been contributing to the trust since August 1993. The value of the Kumba Rehabilitation Trust at a point in time is shown in the trustees' documentation. The other part of the liability provision for the site is provided for in terms of bank guarantees. The amounts for both funds are updated annually.

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, 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

Planned Corrective Action(s) from previous report Sishen Mine will provide the methodology used to calculate the post-closure cost in the follow-up assessment.

Comments on Progress 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.

Requirement # 3.1.2.1

Requirement The operating company shall respect the rights of workers to freedom of association and collective bargaining.

Critical Yes

Rating from previous report Substantially meets

Justification from previous report Policies and procedures reference the International Labour Organization (ILO) core labor rights, including the freedom of association and collective bargaining. agreement between Sishen mine and the Association of Mineworkers & Construction union. This provided evidence of implementation. Induction includes human rights and antibullying, harassment and victimization training. Interviews with operating company employees confirm that they have been informed about union membership by human resources and union representatives during induction. A union membership application was provided. The process is voluntary. However, interviews with contracted workers indicate that their employers may strongly discourage efforts to participate in unionization.

Planned Corrective Action(s) from previous report Pending receipt

Comments on Progress Anglo American has introduced a Responsible Sourcing Standard for Suppliers in 2024. Section 3.5 references “Permit freedom of association and allow unrestricted access to confidential grievance mechanisms”.

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 it related to direct employees of the mine only. Subsequent to the 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.

See Section 3.7. and 6.3. for more details. Consequently, the critical requirements related to these issues have not been re-rated at this time. Based on the comments above, the rating of Substantially Meets has not changed. This requirement will be reviewed as part of the renewal audit.

Requirement # 3.1.3.3

Requirement The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.

Critical Yes

Rating from previous report Substantially Meets

Justification from previous report The Sexual Harassment Policy and a workplace procedure identifying the principles and procedures to be followed are in place. bullying, harassment, and victimization training is compulsory for all employees. Harassment prohibition is included during induction training. Two discrimination and harassment case summaries, including the resolution action taken, were provided. Interviews with managers and workers confirm a zero tolerance for harassment. Worker examples were provided of how the grievance process was available and effectively used. Interviews with contracted workers did not indicate specific instances of harassment, intimidation or exploitation of women, but did highlight a tendency for contracted workers to refrain from reporting grievances through available mechanisms due to perceived inaction.

Planned Corrective Action(s) from previous report Pending receipt

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. However, surveillance audit worker interviews continue to indicate that discrimination and intimidation of contract workers by direct employees remains a persistent issue requiring ongoing attention since contract workers make up a majority of Sishen's workforce. Despite communications campaigns, contract workers indicate a reduced interest in utilizing the Living with Dignity Hub, especially if their already tenuous job security could be impacted. With these outstanding concerns, this requirement remains at a rating of Substantially Meets, subject to further review during the next audit. See Sections 3.7. and 6.3 for more detail.

Requirement ## 3.2.4.1

Requirement The operating company shall implement measures to protect the safety and health of workers including:

- a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;
- b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;
- c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;
- d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;
- e. Providing adequate supervision and control on each shift; and
- f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground

Critical Yes (a and b)

Rating from previous report Substantially Meets

Justification from previous report 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 updated and made available to workers in all instances. During the follow-up assessment, corrective actions conducted by the site were reviewed, including examples of job risk assessment task lists. Out-of-date job risk assessments have been reviewed and updated within the CWS Tracking Tool. The site has established a detailed personal protective equipment specification, procedure, and standard.

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. While on-site, tours were conducted of the emergency response and occupational health and safety facilities available to all employees, and contracted services for advanced patient transport were confirmed.

Health and safety training programs were sampled, and adequate supervision of workers was observed during the site tours

Planned Corrective Action(s) from previous report

Sishen Mine has implemented numerous measures to protect the health and safety of workers, including individual requirements. Specific measures to address point (a) and (b) of the requirement may include:

1. Updating Governance and training documentation,
2. Monitoring and measuring the number of visible felt leadership hours in the field, to ensure adequate oversight of work being undertaken.

Comments on Progress

Sishen Mine has made notable improvements since the previous audit. Job risk assessments have been updated and captured in a tracking tool, and governance and training documentation have been revised. PPE standards are in place and training on the use of fit tests has been updated. A sample of Job Risk Assessments, training documents, and the revised PPE standard were provided and reviewed. Emergency response facilities and health services were confirmed, and training programs sampled were adequate. Visible Felt Leadership (VFL) activities have been reinforced through several changes, including more robust monitoring of revised Key Performance Indicators (KPIs) for leaders. Overall, all prior gaps have been sufficiently addressed, and the rating can therefore be upgraded to Fully Meets.

Requirement # 3.3.1.1

Requirement

The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:

- a. General mining operations;
- b. Operation of mine-related equipment or vehicles on public roads;
- c. Operational accidents;
- d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);
- e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6)
- f. Mining-related effects on community demographics, including in-migration of mine workers and others;
- g. Mining-related impacts on availability of services;

h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and
 i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project.

Critical

Yes

Rating from previous report

Substantially Meets

Justification from previous report

Documents such as the baseline Workplace Risk Assessment and Control identify sources of risks and impacts associated with sources listed in "a" through "i" of this requirement. The site is in the process of improving the identification of risks and impacts to the community through a scoping research project. However, the on-site assessment found limited evidence of the assessment of mining-related impacts on priority ecosystem services, in particular the impact of dewatering in the Kathu Forest.

Planned Corrective Action(s) from previous report

As part of the community health and safety, Sishen mine will review the baseline workplace risk assessment to include the mining related impacts on priority ecosystems.

Comments on Progress

Since the last assessment, the mine has refreshed relevant social and environmental programs with considerable overlap in the area of community health and safety. A Biodiversity Management Plan (BMP) was developed in 2024, and the mine also conducted a Camelthorn tree mortality assessment. At the time of assessment, the mine was also engaged in an ongoing 2025 social impact study, which included consideration of environmental impacts. Review of provided information, discussion with responsible personnel, and confirmation of completion of a camelthorn assessment demonstrates that the gap related to assessment of the impact of dewatering in the Kathu Forest is closed. The rating can therefore be revised to Fully Meets.

Requirement # 4.1.4.1

Requirement

A risk-based approach to mine waste assessment and management shall be implemented that includes:

- a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;
- b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;
- c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and
- d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).

Critical

Yes

Rating from previous report

Substantially Meets

Justification from previous report

The site has developed and implemented a procedure on risk management for the mine. Independent risk assessments are conducted and updated for the tailings facilities. However, the onsite assessment identified that no risk assessments were conducted for any of the other identified waste facilities at the mine.

At the follow-up audit, a baseline risk assessment was made available for review and includes environmental, chemical, social, health and safety and physical risks.

The "Baseline Risk Assessment – Waste & Water" was made available for review. All risks identified in the baseline risk assessment as having a potential impact rating of 5 (i.e., major risks) are taken through issue-based risk assessment processes followed by bowtie analyses. The bowtie analyses process identifies critical controls and other controls that are required to prevent the priority unwanted events. Third-party assessments of waste facilities were available for review. The frequency of review and the process for updating the risk registers was not clear from the documentation supplied

Planned Corrective Action(s) from previous report

Sishen Mine will review the procedure to include the frequency of review and the process of updating the risk register.

Comments on Progress

Since the initial audit, Sishen Mine has updated its risk management procedure to include a defined frequency for review and a clear process for updating risk registers. The updated procedure was finalized in March 2024 (document reference reviewed during the surveillance audit). Evidence confirms that risk assessments for all mineral residue facilities and other waste facilities have been completed and documented in the Baseline Risk Assessment – Waste

& Water, which includes environmental, chemical, social, health and safety, and physical risks.

Risks identified as major are taken through issue-based risk assessment processes followed by bowtie analyses to identify critical controls and preventive measures. Third-party assessments of waste facilities were also available for review. The mine demonstrated that risk assessments are now updated quarterly for high-risk facilities and annually for others, in line with the revised procedure. Examples of updated risk registers and bowtie analyses dated July 2024, and October 2024 were reviewed, confirming that the frequency of review is being followed.

Risk assessments are aligned with Priority Unwanted Events (PUEs) identified through WRAC (Workplace Risk Assessment and Control), and updates inform changes to the Operation, Maintenance and Surveillance (OMS) manual. These improvements address all prior gaps identified during the initial audit. Based on the evidence provided, prior gaps have been addressed, and the rating can therefore be upgraded to Fully Meets.

Requirement # 4.1.5.1

Requirement Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).

Critical Yes

Rating from previous report Substantially Meets

Justification from previous report The site has considered the best available technologies (BAT) and best available/ applicable practices (BAP) in the design of tailings facilities on-site. The site is conducting monitoring and updating of risk assessments of tailings facilities, which also inform management at review meetings. However, no evidence was submitted for review to show that these criteria have been applied to all mine waste facilities.

The mine personnel confirmed that tailings facilities, as rated in the risk assessment, are the most critical waste facilities on site with respect to design and risk mitigation.

Planned Corrective Sishen 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

Action(s) from previous report	and mitigation of risks at site level. By 2025, Sishen 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
Comments on Progress	<p>Tailings Storage Facilities (TSFs) at Sishen are designed and managed in accordance with Anglo American’s Mineral Residue Facilities and Water Management Structures Standard in alignment with best available practice and best available technology. TSF stability reports were reviewed during the surveillance assessment to confirm this.</p> <p>Sishen Mine has publicly disclosed its Global Industry Standard on Tailings Management (GISTM) compliance as of August 2024.</p> <p>Mine has conducted a review of other waste facilities and determined that mitigation measures are aligned with best available practices (BAP) and determined they were not rated as significant in terms of triggering Priority Unwanted Events (PUEs).</p> <p>Overall, all prior gaps have been addressed, and the rating can therefore be upgraded to Fully Meets.</p>
Requirement # 4.1.5.6	
Requirement	<p>On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d. Inform the management review to facilitate continual improvement (see 4.1.5.8).
Critical	Yes
Rating from previous report	Substantially Meets

Justification from previous report The site is conducting monitoring and updating of risk assessments of tailings facilities which also informs management at review meetings. According to the risk assessment, the tailings facilities, are regarded as the highest risk of all the mine waste facilities.

The mine appointed a specialist to assist with developing performance objectives for the mine waste facilities. The mine has scheduled inspections to be performed by internal and external experts.

No further evidence was submitted to show that the site considers the same criteria for all the other onsite waste facilities

Planned Corrective Action(s) from previous report Pending receipt

Comments on Progress Since the initial audit, which highlighted uncertainty about whether the mine evaluates the performance of other (non-mineral) waste facilities, Sishen has scheduled inspections and monitoring for waste management facilities beyond tailings, including the on-site waste yard and landfill. Findings from these inspections were incorporated into management reviews and used to update risk management processes and Operation, Maintenance and Surveillance (OMS) manual documentation.

However, new concerns were noted during the surveillance audit, related to significant quantities of recyclable materials in landfill cells, in contrast with the mine’s recycling and waste segregation programs, as well as their goal to send zero waste to landfill. The noted evidence suggests that there is a gap in this process with regard to the waste landfill, therefore the critical requirement should remain “Substantially Meets”. See Sections 3.7. and 6.3 for more detail.

Requirement # 4.2.4.4

Requirement The operating company shall develop and implement an adaptive management plan for water that:

- a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and
- b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.

Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	<p>An Adaptive Water Management Standard has been developed. However, at the time of the onsite audit, it was still in draft format. The site intends to develop the plan according to the standard once the standard has been approved.</p> <p>During the follow-up assessment the audit team reviewed the additional information provided. The evidence reviewed included the "Kumba Iron Ore Adaptive Water Management Standard", the "Water Management Plan", and guidance documentation explaining the relationship between these documents. Water quality management within the Water Management Plan includes information on the required elements of water quality monitoring, (e.g. potable, surface, and ground water). Monthly, quarterly and annual reporting frequencies have been established. Trigger action response plan (TARP) is referenced under Tailings Water Management but is focused on dam wall failure or loss of containment. Evidence provided for Sishen included discussion of Site-Specific Trigger Values (SSTVs). Additional supporting documentation was presented to the audit team, explaining the relationship between the Water Management Plan, the Kumba Iron Ore 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 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>
Planned Corrective Action(s) from previous report	Kumba has developed an adaptive water management standard with specific actions to address the finding include Annual review of the effectiveness of the water management measures in preventing negative changes in the two water quality objectives established in the plan. This can include the update of monitoring points and the TARP based on the SSTVs
Comments on Progress	<p>Since 2022, Kumba Iron Ore has undertaken significant initiatives to strengthen water management across its operations. These efforts have focused on implementing the Adaptive Water Management Plan (AWMP) and improving the integration of site-level water management with the broader regional water scheme. The development of the AWMP was informed by extensive stakeholder engagement, including active participation from community teams, to align the plan with local needs and sustainability objectives.</p> <p>Since the previous audit report was published, the AWMP was implemented and has undergone a further round of revision/update.</p>

Trigger levels are incorporated in the AWMP. Monitoring records show that appropriate parameters are monitored, and investigation/actions initiated where required. 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 surveillance specifically evaluated the implementation of the three Adaptive Water Management Plans (AWMPs), as highlighted in the initial audit report. This focus was addressed through a combination of on-site inspections, document reviews, and interviews with facility environmental personnel. Evidence reviewed included:

Operational records and project tracking documents demonstrating how AWMP actions were prioritized and scheduled.

Examples of completed and ongoing improvement projects linked directly to AWMP objectives, such as water balance optimization and water quality enhancement.

Integration measures showing alignment between site-level water management and the regional water scheme.

Stakeholder engagement records confirming community involvement during AWMP development and implementation.

Based on this evidence, the AWMPs are effectively implemented and actively used as a decision-making tool for water management improvements. This level of implementation supports upgrading the rating to Fully Meets, as all prior gaps identified in the initial audit have been addressed.

Requirement # 4.6.2.1

Requirement New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities.

Critical Yes

Rating from previous report Substantially Meets

Justification from previous report	<p>The site has conducted screening and Environmental Impact Assessments for the location of the western rock dumps, recent relocation of the rail line and for the ongoing expansion of the pit.</p> <p>These assessments highlight sensitive ecosystems, including protected areas like the nearby Kathu Forest, the first protected forest in South Africa. Areas identified and classified include current mining, future expansion, and neighboring farms, residential and wildland areas. The site drafted a management plan in 2019, which includes identifying the need to implement biodiversity and socio-ecological research as a part of the research and monitoring objectives. Sishen is currently evaluating a proposal for research aimed at understanding the possible relationship between Camelthorn tree mortalities and mine-related activities.</p>
Planned Corrective Action(s) from previous report	<p>Sishen Mine will undertake a study aimed at understanding the possible relationship between Camelthorn tree mortalities and mine related activities.</p>
Comments on Progress	<p>Since the initial audit, the operation has undertaken further work to better understand potential impacts through the Woodland biodiversity study that was completed in 2024. This study addresses several objectives relevant to tree distribution, condition, and ecological context, and the findings have been incorporated into the Biodiversity Management Program (BMP). Although the originally planned Camelthorn-specific mortality assessment identified as a corrective action was not implemented as initially proposed, the Woodland study represents an alternative line of enquiry that achieves a comparable outcome in terms of understanding risks and informing management responses. Based on a review of the available evidence and confirmation that the study findings have informed the BMP; the approach is considered comprehensive and aligned with the intent of the IRMA requirement. The requirement is therefore assessed as Fully Meets.</p>

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 United Nations Guiding Principles (UNGP) and the Anglo-way process.

- Sishen mine is making good progress toward compliance with the new Integrated Permitting Standard. A dashboard for permit renewal and action status is feeding into a range of reports.
- The mine has strengthened internal processes to investigate fraudulent / corrupt procurement or other practices (i.e. spending; training; document management.)

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

- The “Journey to Wellness” program that was launched in 2024 promotes healthier lifestyles among employees through organized physical activities.
- The Fatal Risk Management program was launched in July 2025, with simplified identification of critical controls.
- During worker interviews, most interviewees expressed the perception that, overall, the mine takes safety very seriously.
- Victimization, Harassment and Bullying campaigns added to induction training mandatory for all employees and contract workers.
- Community participation in Social Labour Plan consultations.

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

- The mine’s participation in and contributions to the regional water management scheme continue to evolve and represent noteworthy best practice.
- Sishen has developed and implemented a new Biodiversity Management plan in 2024 with focus on offset strategies.

3.7. Concerns Related to Continued Maintenance of Achievement Level

Evidence gathered during interviews and discussions with workers during both the initial IRMA audit and the current surveillance pointed to concerns related to some contractors not respecting the rights of workers to freedom of association and collective bargaining. A small group of workers interviewed

reported being employed without a contract. In this context their interest and ability to raise grievances would likely be severely limited.

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. This was because the term "operating company" was narrowly interpreted to mean the Company operating the mine site, namely Kumba Iron Ore, a subsidiary of Anglo American. Subsequent to the initial assessment, interpretation of the related IRMA requirements has been clarified as applying to all workers, i.e. including both the Company operating the mine and all suppliers. As this was not communicated to the mine at the time of the audit, 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.

However, all related requirements will be fully re-evaluated at the renewal audit (anticipated in 2027) 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.

4. General Performance by IRMA Standard Principle and Chapter

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

4.1. Principle 1: Business Integrity

During the previous audit, this principal received an overall score of 82%. 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. The critical requirement 1.1.1.1. in this chapter was previously rated as “Fully Meets” and discussions and documents reviewed during this assessment continued to support that rating.

Compliance audits continue to be undertaken periodically since the initial audit (approximately 2-yearly). The reports provided conclude that processes are mature and effective in preventing and addressing permitting gaps.

The mine continues to maintain a dashboard for regulatory performance, which includes breakdown by type of issue, year-over-year total, closure rate, etc. A new system for recording, tracking and presenting data was launched in June 2025 to make the management of actions more flexible and efficient.

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. and three requirements which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement, 1.2.2.2, is summarized in Section 3.5.

Positive progress continues to be made in community and stakeholder engagement based on provided evidence and stakeholder feedback.

Implementation of a broad-based Community Engagement Forum has evolved into more topic-specific discussion groups. The integrated Environmental Forums at Sishen and Kolomela have been well-received by stakeholder participants in terms of providing a means by which environmental issues (i.e. water use and discharges) can be discussed and addressed in a timely manner.

However, other forums related to business and unemployment are considered less effective to date. Participants in other business and unemployment forums reflected the transactional nature of communications with the mine and the limited local contracting and employment opportunities for local residents and businesses.

At the same time, changes to the South African Mining Charter (Mining Charter III) have opened a new door to stakeholder engagement and encouraged greater community participation in Integrated Development Plan and Social Labour Plan discussions that has been welcomed by surveillance audit interviewees.

Chapter 1.3—Human Rights Due Diligence

Chapter 1.3 was partially audited during the surveillance audit. Auditing was focused primarily on four requirements from this chapter, including three critical requirements. Critical 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.

Following the initial audit, the mine has developed a Human Right Due Diligence (HRDD) report, which was completed in early 2023. Its stated aim is to guide Sishen in improving on identified human rights impacts and gaps in its programming in this area. Two impacts rated as High were identified, focusing on resettlement and public / personal security during protests due to excessive use of force. Five impacts were rated as Significant related to workers' rights, access to information and remedy and potential road, transport and traffic hazards.

A Social and Human Impact Risk Analysis (SHIRA) is conducted quarterly. Despite this, a number of identified risks rated High in the HRDD continue to persist. Terms of reference for a Kumba Human Rights Working Group has been developed and the group met twice in 2025. A case study approach to addressing human rights impacts is still in development.

As part of the Sishen surveillance audit, the audit team is reviewing the relevance of Chapter 2.2 Free Prior Informed Consent 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 renewal audit.

Chapter 1.4—Complaints Mechanism/Access to Remedy

Chapter 1.4 was partially audited during the surveillance audit. Auditing was focused primarily on three requirements from this chapter, including critical requirement 1.4.1.1. and two requirements which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement 1.4.1.1. is summarized in Section 3.5.

Since the initial IRMA audit the mine has made an effort 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-Social way process. Stakeholders interviewed during the surveillance audit recognized the Mine's efforts to report back on grievances received during engagement events but also wanted more communications opportunities to address concerns and priorities.

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

The relatively low number of grievances, rather than being an indicator of effectiveness, may suggest low expectations that lodging a grievance will result in a positive outcome for the complainant.

Chapter 1.5—Revenue and Payments Transparency

Chapter 1.5 was partially audited during the surveillance audit. The critical requirement 1.5.5.1. was reviewed for this chapter, which 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.

No changes related to this chapter have occurred since the initial audit.

4.2. Principle 2: Planning for Positive Legacies

During the previous audit, this principal received an overall score of 79%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 2.1—Env/Soc Impact Assessment and Management

Chapter 2.1 was partially audited during the surveillance audit. Auditing was focused primarily on twelve requirements from this chapter, including critical requirement 2.1.3.1. and eleven requirements which did not achieve a Fully Meets rating at the initial audit. The critical requirement 2.1.3.1. 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.

Sishen 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 nationally and engagement by the Mine with a self-identified and amalgamated Indigenous group (collectively referred to as Korana First Nation) was at a preliminary stage. Since then, Kumba Iron Ore has developed an integrated management system for the Sishen and Kolomela mines. The audit team is also aware that Anglo American's Group Indigenous Peoples Policy is currently under review. In the interim, management has demonstrated an interest in engaging with Indigenous representatives at a senior level and as key stakeholders (a meeting with a Korana First Nation representative and senior Anglo American leadership was held in October 2025).

The topic of indigeneity continues to evolve in the South African context. The Mine commissioned an Indigenous Peoples Scoping Study that provides an interpretive history of earlier Indigenous Peoples presence in the Mine area. As part of the surveillance audit, the social auditor had an opportunity to interview a representative from Indigenous First Nations Advocacy South

Africa (IFNASA), as well as self-identified Indigenous representatives within the Sishen mine's Area of Influence (AoI) that include the Korana First Nation referenced. During the interview a number of Indigenous groups were referenced including the Groenwater community and the Griqua Peoples. While not officially recognized as an Indigenous leader by the South African government, the representatives interviewed provided evidence that suggests the presence of Indigenous peoples throughout the region and the mine's operational area. Representatives also referred to cultural heritage locations and artifacts that may be present and have been identified in the mine concession. Further, the representatives raised the idea that the Dingleton community resettled by the mine, was populated by Indigenous individuals and groups that the representative referred to as, "coloured people".

While it is not the task or responsibility of the audit team to determine whether a community should or should not be considered "indigenous" and there is currently insufficient evidence to determine the relevance or applicability of this chapter, it is noted that the mine has taken a proactive approach that has continued since the initial audit to periodically engage at a senior management level with Korana First Nation representatives. The Company has in place a policy and Indigenous Peoples statement aligned with the recognition of Indigenous rights and UNDRIP. Discussions with Sishen management indicate that that a corporate approach to enhanced engagement with Indigenous groups continues to be formulated. Accordingly, the relevance of Chapter 2.2 will be reviewed during the next audit renewal process.

Chapter 2.3—Community Support and Benefits

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

Surveillance audit interviews with community members and representatives indicate a mixture of support for Sishen mine's participation in community infrastructure projects and disappointment with employment, contracting and procurement-related opportunities. Community leaders and non-profit representatives also emphasized the potential for improved collaboration and communications on community-prioritized infrastructure projects, especially

in rural areas where infrastructure is limited and the needs of vulnerable groups are highest.

This limited surveillance audit engagement included interview comments highlighting resettlement challenges, inadequate compensation, housing and infrastructure and other on-going community grievances. Lack of transparency around mine procurement practices, limited employment and contracting opportunities and ineffective contractor and other forums were mentioned. Government representatives provided a positive impression of Social Labour Plan project negotiations with the mine but lamented a lack of “boldness of vision” in support of proposed infrastructure projects. Meaningful consultations with communities by the mine during recent Social Labour Plan discussions were commended by local government representatives. The prevalence of South African corruption was mentioned as a factor that increases development and project costs. Indigenous representatives provided commentary on the extent of the largely unrecognized indigeneity in South Africa to date.

Chapter 2.4—Resettlement

Chapter 2.4 was partially audited during the surveillance audit. Auditing was focused primarily on three requirements from this chapter, including critical requirement 2.4.7.1. and two requirements that did not achieve a Fully Meets rating at the initial audit. Critical requirement 2.4.7.1. 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, subject to review during the next audit.

Resettlement of Dingleton to Siyathemba remains contentious for some residents of the new community. A mine commissioned close-out audit report was nearing completion and presentation to the impacted community was scheduled near the time of the surveillance audit. Interviews held during surveillance highlight long-held issues and grievances by resettled residents that include deficiencies with promised payments, housing and infrastructure. While the mine hopes to bring closure to the resettlement process and integration of the community into the local Gamagara municipality through the close-out audit report, lingering issues of fairness and economic displacement remain active for resettled community members. Accordingly, resettlement will continue to be reviewed during the next audit cycle.

Chapter 2.5—Emergency Preparedness and Response

Chapter 2.5 was partially audited during the surveillance audit. Auditing was focused primarily on the two critical requirements from this chapter (2.5.1.1., 2.5.2.1.). Progress on the critical requirement 2.5.1.1. is summarized in Section 3.5 and the rating for this requirement was upgraded to Fully Meets. Critical requirement 2.5.2.1. 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.

A lot of work has gone into ensuring that the emergency response process meets UN APELL requirements. Since the initial audit, a gap analysis was conducted. The gap analysis indicated a need for emergency support capacity improvement in communities and the municipality. The mine conducted awareness training in the community on prevention of bush fires, during a high-risk fire period, trained approximately 100 people in fire response, and also donated AFFF to the local community policing forum.

The Emergency Management Plan (EMP) was updated as a result of the gap analysis.

The Tailings Storage Facility (TSF) Emergency Response Plans were also updated, resulting in a few minor amendments and additions, including incorporation of a TSF recovery plan. Annual review of the Emergency Response Plan is scheduled, and updates will also be initiated if emergency drills identify gaps. Stakeholder contacts may also be updated based on checks at quarterly Disaster Advisory Committee and Northern Cape Emergency Support Team meetings. The mine also participates, quarterly, in the Gamagara Joint Operations Committee, which combines safety and security issues for the district.

Sishen continues to use an advisory platform for stakeholder engagement/feedback on development of Emergency Response Plans. Mine emergency response specialists attend various local forums to provide information and answer questions.

Drills since the initial IRMA audit include TSF emergency drills involving emergency response stakeholders but not directly involving communities, as a TSF failure would not inundate the community (at final planned height, some mine residences would be potentially impacted). Practical implementation is evident through multiple fire simulations in 2024, and a stakeholder engagement day in April 2024.

Updates to TSF risk assessments took place in line with GISTM. Pollution control dams have been re-evaluated and determined to be in-line with Best Applicable Practices (BAP) due to construction according to the relevant Anglo American Group Technical Standard.

The mine experienced a belt fire in 2024, which was contained within the facility. The mine activated emergency response teams, including external stakeholders. Another plant fire was contained by internal teams. The mine maintains fire breaks throughout the concession, as well as managing vegetation around process areas and belts.

The initial audit report flagged the continued maintenance of accident insurance as a follow-up for the surveillance audit. Evidence reviewed confirmed that a new accident insurance was in place for the period of July 2025 to July 2026.

Chapter 2.6—Planning/Financing Reclamation & Closure

Chapter 2.6 was partially audited during the surveillance audit. Auditing was focused primarily on seventeen requirements from this chapter, including three critical requirements (2.6.2.1., 2.6.2.6., 2.6.4.1.) and fourteen 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 requirements 2.6.2.1. and 2.6.2.6. were rated as fully meets in the initial audit.

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. This was identified for follow-up during the surveillance audit.

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 rating for the related requirement in 2.6.4.1 has therefore been upgraded to Fully Meets.

There have been no significant new permits or authorizations related to reclamation and closure since the initial IRMA assessment in 2022.

A significant amount of rehabilitation work has already been completed. There is a rolling 5-year plan updated annually. Tailings are rehabilitated on a progressive basis, which helps to minimize erosion, stabilize slopes and control dust. Rehabilitation plans for some long-disused dumps will not be

implemented soon, due to access or other complexities but will be built into future plans.

There is an annual review of closure and rehabilitation costs to update for work completed and anticipated price/cost changes, with detailed modelling to justify the budget. A big update in 2022 had a major review of scope but there have not been significant changes since.

The mine is on track for 2025 closure / rehabilitation activities.

The auditors viewed and discussed rehabilitation activities during a site tour. Waste rock slopes were being covered with topsoil and seeded with native plants. Additional slopes were being cut back to ensure proper contouring and to provide a suitable slope to control erosion

4.3. Principle 3: Social Responsibility

During the previous audit, this principal received an overall score of 90%. The summaries below indicate in general the overall status of these chapters, relative to the initial 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 seven 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.). Of this chapter's six critical requirements, four were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for critical requirements. The remaining critical requirements, 3.1.2.1., and 3.1.3.3. were rated as substantially meets. These ratings are subject to re-interpretation of the terms “operating company”, “employee” and “worker” during the next re-assessment audit. Progress on these critical requirements is summarized in Section 3.5.

Specifically relevant to the IRMA requirement in 3.1.2.1, Anglo American implemented a Responsible Sourcing Standard for Suppliers (2024). Section 3.5 of the Standard references “Permit freedom of association and allow unrestricted access to confidential grievance mechanisms”. Appropriate implementation of this internal Standard will be reviewed during the next audit.

Additionally, during surveillance interviews, several contractor employees reported a fear of reprisal from reporting grievances. Interviewed employees

(both direct workers and contractors) did not always know if complaints they raised had resulted in any investigation or actions. Further engagement will be needed to demonstrate the effectiveness of the operational-level grievance mechanism.

Chapter 3.2—Occupational Health and Safety

Chapter 3.2 was partially audited during the surveillance audit. Auditing was focused primarily on eight requirements from this chapter, including critical requirement 3.2.4.1. and seven requirements which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement, 3.2.4.1, which was rated as substantially meets, is summarized in Section 3.5. Evidence reviewed by auditors during the surveillance audit confirmed that all prior gaps related to the critical requirement have been addressed, and the rating can therefore be upgraded to Fully Meets.

In response to previous concerns, the mine put significant focus on PPE. PPE specifications were updated in 2024. They apply to all workers, including contractors and visitors, and include applicability instructions. It is expected that contractors will adhere to these requirements.

The mine has implemented an occupational exposure standard for silica, which is lowered from 0.1. to 0.05 but the existing PPE was found to be adequate to control exposure. Training on the use of FIT tests was updated. Outstanding tasks include procuring improved masks, for which there is an action in Isometrix for roll out by the end of 2025.

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.

During interviews, workers generally stated that they felt safe in the workplace and that the mine takes safety seriously

Incidents that have occurred in the last two years were discussed and a small sample of investigations and actions were reviewed and found to be acceptable. Most interviewees made comments reinforcing their perception that the mine takes safety on site seriously.

Several safety related concerns were noted and discussed during the site visit, including:

- While driving around process areas, several passing vehicles, including articulated dump trucks, did not trigger the in-vehicle collision

avoidance system (of the vehicle the auditor was travelling in), suggesting that the other vehicles either did not have systems installed or they were not functioning correctly.

- Following a fire at the MOD processing plant, fire detection and response systems were reportedly reviewed and improved, where necessary. However, review of fire detection and response systems at the JIG showed that almost half of the substation monitoring systems showed abnormal (unlikely) temperatures or were in fault status. Inspection of the fire extinguishant panel for the JIG control room also showed a trouble light and the panel was in manual mode.

These observations do not have an impact on the critical requirement in this chapter; however they require further investigation and corrective action, which will be reviewed during the renewal audit.

Chapter 3.3—Community Health and Safety

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

Since the last assessment, the mine has refreshed relevant social and environmental programs with considerable overlap in the area of community health and safety. The mine completed a health impact assessment in 2024 to look at potential risks and subsequently developed a community health management plan in 2024. At the time of assessment, the mine was engaged in an ongoing 2025 social impact study, which included consideration of environmental impacts. Stakeholder feedback interviews did not highlight any change in community health and safety perceptions during surveillance audit.

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. Programmes continue to focus on TB and HIV, as well as initiatives aimed at adolescents and women. 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.

Revisions to water stewardship put increased emphasis on and further strengthen the mine's programs for minimizing the environmental and social impact of water use and assisting local communities with water supply.

The Sishen Medical Centre continues to provide occupational health services, including medical surveillance, rehabilitation and functional assessments, HIV & TB services, and chronic disease management. Emergency services continue to be outsourced to Waruna based at the mine's fire station.

Chapter 3.4—Conflict-Affected and High-Risk Areas

Chapter 3.4. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that the issues addressed in the chapter continue to not be applicable at the mine. The audit team notes numerous and persistent reports of endemic corruption in South Africa but for the purposes of this audit they would not meet IRMA's definitions or other generally accepted international thresholds for conflict-affected or high-risk areas (i.e. OECD-defined considerations and criteria).

Chapter 3.5—Security Arrangements

Chapter 3.5 was partially audited during the surveillance audit. Auditing was focused primarily on eight requirements from this chapter, including critical requirement 3.5.1.2 and seven requirements which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement is summarized in Section 3.5.

Some structural and programmatic security gaps were identified during the surveillance audit. The access gate system at SIVOS Training Centre was found to be non-operational, compromising entry control. Visitor logs lacked proper verification, and enforcement of visitor restrictions was inconsistent. Night security staffing was inadequate, with only two guards on duty—one patrolling and the other left alone at the post. Emergency planning was insufficient, with no clear procedures or evacuation routes displayed. Students on site were not trained in emergency protocols, and no updated resident lists or clock-in/out systems were available for verification during evacuations. Surveillance cameras were either non-functional or absent in key areas. Incident log entries were not maintained, reducing accountability. These findings indicate that while some policies exist, their implementation and enforcement require further attention in order to meet IRMA standards.

In addition, the Sishen Human Rights Due Diligence Report (2023) identifies a potential risk related to the use of excessive force during community protests. However, as at the time of the surveillance audit, this risk had not materialized, and no complaints or grievances regarding the use of excessive force by mine security were identified. Stakeholder interviews similarly did not raise any concerns relating to mine security practices. While the absence of incidents suggests that current controls have been effective to date, security arrangements will continue to be reviewed in detail during the next audit cycle to confirm their continued adequacy and alignment with human rights commitments.

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.

Chapter 3.7—Cultural Heritage

This chapter was not audited during the surveillance audit.

As part of the Sishen 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 3.7 in the next reassessment audit.

4.4. Principle 4: Environmental Responsibility

During the previous audit, this principal received an overall score of 77%. 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 ten requirements from this chapter, including critical requirements 4.1.4.1, 4.1.5.1, 4.1.5.6 and 4.1.8.1. Critical requirement 4.1.8.1 was rated Fully Meets at the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement.

Critical requirements 4.1.4.1, 4.1.5.1, 4.1.5.6, were rated Substantially Meets at the initial audit. See Section 3.5. for progress updates for these requirements.

Sishen Mine has publicly disclosed its Global Industry Standard on Tailings Management (GISTM) compliance status as of August 2024. The facility was classified as “Extreme Consequence” under the GISTM and is managed in accordance with GISTM standards. The 2025 GISTM report for Kumba Iron Ore can be accessed at: <https://www.angloamerican.com/~media/Files/A/Anglo-American-Group-v9/PLC/tailings-database-items/gistm/2025-gistm-disclosure-kio-stage-5-vf.pdf>.

A Tailings Storage Facility Operational Risk Assurance (ORA) Audit was completed in July 2024 under Anglo American’s 2024 audit plan to assess risks of Tailings Dam Failure. The site requested that the results of the internal audit be held confidential due to their sensitive nature.

ORA and GISTM reports show continuous improvement efforts regarding the management of Sishen Tailings Storage Facilities.

Since the initial audit, Sishen Mine has carried out chemical and physical risk reviews on all of its waste facilities, including an update of risk register and bowtie analysis dated July and October 2024. Risk assessments that are aligned with Priority Unwanted Events (PUEs) identified through WRAC (Workplace Risk Assessment and Control), were updated quarterly and annually, depending on the facility’s risk profile. The baseline risk assessment is reviewed annually. These risk assessments were also formally documented and revised as needed. Document review confirmed that critical controls are regularly evaluated through internal audits and risk assurance processes, and the results inform updates to risk management and Operation, Maintenance and Surveillance (OMS) manual. Management is informed of the performance of waste facilities monthly and during annual Management reviews.

During the surveillance assessment, the non-mineral waste management facility was visited and found to be generally well-managed. Improvement opportunities were noted and discussed with regard to better labelling of drums of waste at the source, to allow easier classification, handling and storage at the waste yard, and the need to better handle fluorescent tubes to prevent or contain breakage.

At the on-site waste landfill, there is a facility to collect and segregate recyclable materials, and some separate recyclables were noted. However,

there remained a significant quantity of recyclable materials (predominantly plastic bottles and cardboard) in the landfill cells, including some waste bags containing nothing but recyclable bottles. This observation contrasts with the mine's stated goal of 'Zero Waste to Landfill', and shows that operating procedures are not being followed, and supervision/oversight and evaluation processes are not fully effective. Critical requirement 4.1.5.6 requires regular evaluation of mine waste facilities' performance and feedback to management for continuous improvement. The noted evidence strongly suggests that there is a gap in this process with regard to the (non-mineral) waste landfill, and the critical requirement should continue to be rated as Substantially Meets, even though previous corrective actions were completed.

Chapter 4.2—Water Management

Chapter 4.2 was partially audited during the surveillance audit. Auditing was focused primarily on thirteen requirements from this chapter, including two critical requirements (4.2.4.1., 4.2.4.4.), and eleven 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, and it is now rated as Fully Meets.

Since 2022, Kumba Iron Ore has carried out work on water management across the organization, including at Sishen. 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.

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 IRMA 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. The AMWP was also used to identify areas of risk and opportunity and guide the development of improvement projects.

Sishen dewatering operations withdraw more groundwater than required to meet process and other internal requirements, so the mine provides water to local communities and to the regional bulk water supply system. The mine has also been able to provide some water to a neighbouring mine, reducing its demand from the regional supply.

Monitoring and trigger-action-responses were updated and incorporated into the AWMP. The development and update of the AWMP included stakeholder engagement. The current strategy has addressed the gap and includes more stakeholder input via involvement of the Community Team.

During the site visit, the audit team viewed the main pollution control dams (PCDs) and visited the pit to view a potential water storage project in Central Pit. Various plans, maps and reports, covering a range of areas from groundwater modelling to regional surface drainage, area stormwater runoff and monitoring systems were also viewed and discussed. Several oil/water separators noted around the site needed maintenance due to silting or inoperable skimmer systems.

Issues noted with Sishen infrastructure included a lack of real-time monitoring of pumps and levels at pollution control dams, and a lack of backup pumping capacity. In general, existing PCDs do not provide sufficient backup storage capacity. These were all known issues, and various plans were under development to address them, including the use of the Central Sishen pit as a water storage facility. However, the construction of pollution control dams etc., was evaluated by the mine as part of the corrective action from the initial IRMA assessment and determined to be in line with best available practice (BAP).

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 rating for this critical requirement.

The mine has continued to implement its air quality management plan, which was developed prior to the initial audit. Daily dust observations are carried out across the mine, including external areas such as the landfill site. Specific exceedance reports are developed when pollutant levels surpass thresholds.

On 25 August 2025, exceedances of PM2.5 and PM10 were recorded. The investigation included wind direction analysis and micro-scanning of dust samples, which confirmed the dust was mine-related due to quartzite content. The exceedance and resulting actions were communicated to stakeholders at the quarterly Farmers Forum in September 2025, with full details pending. One dust-related complaint was noted, linked to topsoil stripping.

In 2025, the mine developed a Workplace Exposure Reduction Plan which identified respirable silica and inhalable hazards as significant air quality risks at Sishen Mine. These are classified as Group 1 carcinogens and pose serious occupational health risks if not adequately controlled. Structured monitoring and evaluation activities, such as monthly air quality and instrumentation reports, are carried out. Community exposures are assessed through ambient air quality monitoring beyond the mining boundary and engagement with communities regarding the air quality concerns.

Chapter 4.4—Noise and Vibration

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

A noise-related complaint was recorded in 2024 from a local Farmer near the opencast mining pits. The noise complaint was investigated and resolved within the allowable time frame according to the complaint procedure. The mine confirmed that customized Hearing Protection Devices were deployed to address occupational noise risks. Monitoring data is reviewed regularly and compared to IFC thresholds.

The mine continues to engage stakeholders through quarterly forums, including the Farmers Forum, where noise and dust complaints are raised and discussed. Evidence reviewed confirms that complaints are captured and reflected in forum discussions and meeting records. However, the audit noted limitations in the effectiveness of the feedback mechanisms and resolution tracking. While issues such as dust and noise exceedances are tabled at the forum, there is not always clear documentation demonstrating how feedback is formally communicated back to affected stakeholders after the meeting. Furthermore, complaint records do not consistently include defined close-out actions, responsible persons, or timeframes for resolution,

and there is limited evidence of systematic follow-up at subsequent forums to confirm whether previously raised concerns have been resolved or remain open. As a result, although engagement occurs regularly, the current approach does not fully demonstrate a closed-loop grievance management process for Farmers Forum concerns.

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.

Sishen 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.

Ongoing initiatives taking place include energy efficiency upgrades, fuel switching strategies and exploration of renewable energy options. These initiatives are documented and integrated into operational planning. The mine tracks its targets against the group climate strategy via internal dashboards. This includes monthly and quarterly emissions data, which is reported to the Anglo American sustainability team. Progress is reviewed during management meetings.

The ongoing construction of the planned solar photovoltaic (PV) plant has completed the bulk earthworks stage in mid-2025, with the construction expected to finish by the end of 2026. This project aims to reduce the mine's Scope 2 carbon emissions by approximately 33%.

Sishen's external reporting since the initial audit has aligned with regulatory and voluntary disclosure frameworks.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Chapter 4.6 was partially audited during the surveillance audit. Auditing was focused primarily on seven requirements from this chapter, including critical requirement 4.6.2.1, which was rated Substantially Meets at the Initial audit. Progress on this critical requirement is summarized in Section 3.5. Three critical requirements, 4.6.4.1, 4.6.5.3 and 4.6.5.4, were not relevant in the initial audit, which was confirmed during the surveillance audit.

Sishen has continued to engage with the Department of Forestry, Fisheries and the Environment (DFFE) and other relevant stakeholders regarding biodiversity. Monitoring continued of Significant Biodiversity Features (SBFs).

Since the last audit, Sishen Mine has developed a new Biodiversity Management Plan (BMP) in 2024, replacing the previous Priority Environmental Programme (PEP) document. The BMP includes dust control, adaptive land management, and water pressure mitigation, Rehabilitation protocols are separated from biodiversity monitoring to ensure focused restoration. The BMP includes a structured monitoring protocol of tree species such as *Vachellia erioloba*, *Boscia albitrunca*, and *V. haematoxylon*, and success criteria framework to measure rehabilitation progress. Vegetation health is tracked using multispectral mapping and elevation data. Actions are identified to prevent damage to Kathu Forest and CBAs.

Community engagement in relation to the biodiversity offset studies under Tree License NC-JT-0009-2022-23 was undertaken primarily through existing stakeholder engagement platforms rather than through stand-alone consultation processes for individual studies. Evidence reviewed indicates that communities were informed of the intent, scope, and progress of the offset and mitigation studies through regular stakeholder forums, including community engagement meetings and established consultation structures used by the mine for environmental and land-use related matters. These engagements focused on explaining why offset studies were required, the types of ecological surveys being undertaken, and the high-level avoidance, mitigation, and rehabilitation measures being considered for disturbed areas such as Kathu Solar Park and the Khumani Offset Area.

Specialist ecological assessments and offset studies were led by external experts, and while the technical biodiversity data collection was not conducted with direct community participation, outcomes and proposed mitigation measures were communicated at a summary level during engagements with affected and interested parties. Authorities and conservation partners, including relevant government departments, were directly involved in identifying and assessing potential offset properties, and feedback from these engagements informed refinement of mitigation and offset approaches.

Since the initial audit, the mine has undertaken further biodiversity assessment work under the Biodiversity Management Programme (BMP) to better understand potential impacts on sensitive ecological features at Sishen. This includes the 2024 Woodland study aimed at improving understanding of woodland structure and composition, including profiling the distribution and condition of Camelthorn trees.

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 RMA 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	Evidence reviewed in this assessment supports upgrading the rating, See 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	Evidence reviewed in this assessment confirms the previous rating, with follow-up needed to address comments made during the surveillance audit.
1.4.1.1.	Substantially Meets	Substantially 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	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.5.1.1	Substantially Meets	Fully Meets	Corrective action plan completed, 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 supports upgrading the rating, See Section 3.5.

Principle 3: Social Responsibility

Req #	Previous Rating	Current Rating	Comment from Auditor
3.1.2.1	Substantially Meets	Substantially Meets	Corrective action plan in progress; outstanding actions described in Section 6.1.
3.1.3.3	Substantially Meets	Substantially Meets	Corrective action plan pending; outstanding actions described in Section 6.1.
3.1.5.1	Fully Meets	Fully 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	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
3.3.1.1	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
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	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.

4.1.5.1	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
4.1.5.6	Substantially Meets	Substantially Meets	Evidence reviewed in this assessment confirms that the corrective action plan was completed. However, new concerns noted during this assessment support a continued rating of Substantially Meets. See section 4.4.1. and Section 6.1 for details.
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	Corrective action plan completed, see progress report in Section 3.5.
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	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
4.6.4.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.4	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.7.7.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.2	Not Relevant	Not Relevant	This critical requirement is not applicable.

6. Next Steps

6.1. Corrective Action Plans

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

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

Principle 1 Outstanding Corrective Action

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

Sishen 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 Days. However, interviews indicate that broader and more consistent communication on human rights is needed to ensure that all potentially affected stakeholders are adequately informed. A proposed Human Rights Working Group and a case study approach to managing human rights risks are yet to be implemented in response to the Human Rights Due Diligence report (2023).

Critical requirement 1.4.1.1. - Access to Operational-Level Complaints and Grievance Mechanism

As noted, grievance lodged by external stakeholders since 2023 focus mostly on transactional issues of unfairness in employment review processes or wage disputes / payment for contractor services rendered. This limited use of available grievance mechanisms may be an indication of perceived limited

utility of presenting issues or complaints to the mine through available options. The IRMA standard requires grievance mechanisms to be developed in collaboration with stakeholders and evaluated periodically to determine their effectiveness.

Principle 3 Outstanding Corrective Actions

Critical requirement 3.1.2.1. – Workers’ Organizations and Agreements

Sishen 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 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. The Living with Dignity Hub was introduced for addressing serious incidents. Despite these advancements, worker interviews continue to suggest that discrimination and intimidation of contract workers remain an ongoing issue. Contract workers have also indicated low interest in utilizing the Living with Dignity Hub due to concerns of this impacting their job security. Further engagement will be needed to demonstrate the effectiveness of site measures to prevent and address harassment.

Principle 4 Outstanding Corrective Actions

Critical requirement 4.1.5.6. - Waste and Materials Management

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 significant quantities of recyclable materials in landfill cells, conflicting with the Sishen objective of ‘Zero Waste to Landfill’. Additional evidence will be needed to demonstrate that the mine processes are effective and being followed.

6.2. Timing of Future Audits

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

6.3. Focus Areas for Next Audit

During the surveillance audit, progress was noted in addressing previously identified corrective actions. However, several gaps remain, particularly in relation to stakeholder engagement, grievance mechanisms, and contractor management.

As noted, a future focus of for the next audit includes compliance with requirements 3.1.2.1 requirements with respect to “freedom of association and collective bargaining” for both the operating company and supplier / contract employers alike. As future audits may be against the new version 2 IRMA standard which includes supply chain considerations, additional attention would be placed on supplier grievances mechanisms in 3.1.3.3. Cross-cutting considerations may also include Chapter 1.1 Legal Compliance.

Several safety-related observations were noted during the site visit. These observations did not have an impact on the critical requirements audited during the surveillance audit; however they require further investigation and corrective action, which will be reviewed during the renewal audit. This includes effectiveness of the vehicle proximity detection system, functioning of the fire detection and response system at the Jig Plant, and implementation of security procedures.

Security arrangements will be reviewed at the next onsite audit as the 2023 Human Rights Due Diligence report identified a high risk of excessive force being used during community protests.

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

In addition to 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. A specific area for follow-up identified during the surveillance assessment includes the relevance of Chapter 2.2 Free Prior Informed

Consent in the evolving context of indigeneity in South Africa. Cross-cutting issues may also include Chapters 1.3 Human Right Due Diligence and 3.7 Cultural Heritage.

Appendix A: Revised Corrective Action Plans

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



IRMA Surveillance Audit

Sishen – Corrective Action Plans

February 2026

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"> i. Cease or change the activity responsible for the impact; and ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third party mediator or another means mutually acceptable to affected rights holders; b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact; c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships. 	<p>The Sishen Human Due Diligence Report was completed in March 2023; however, evidence was not presented during the surveillance audit that a proposed case studies approach had been implemented.</p> <p>Surveillance audit stakeholder interviews did not indicate the use of grievance mechanisms to raise human rights complaints or issues. While the mine undertakes quarterly SHIRA exercises and discusses human rights issues during Stakeholder Days and other forums, the identified High and Significant impacts indicate a continuing gap in programming to be reviewed during the next audit review</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"> 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. <p>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.</p>

Critical Requirement: 1.4.1.1

Requirement	Comment on progress	Corrective Action Plan
<p>The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities</p>	<p>Sishen grievance logs from 2023 – 2025 were reviewed during the surveillance audit, as well as a conflict analysis undertaken in May 2025 after a community protest march on the mine’s gate. Many of the grievances logged during this period focus on employment or contract review related issues. Stakeholder interviews confirm ongoing community concerns over lack of transparency in contract awarding process, perceived inadequacy in employment opportunities and allegations of corruption. Evidence provided indicates a functioning grievance process, that is used sparingly by a narrow stakeholder group (employment candidates and contractors), with limited expectations as to its ability to resolve issues of concern. A gap remains between High risks identified by the mine related to unaddressed community expectations and an effective grievance resolution process.</p>	<p>To promote a culture of transparency and accountability, Kumba aims to enhance existing grievance mechanisms and ensure employees and contractors are aware of available platforms for raising concerns. Specific actions include, and are not limited to:</p> <ul style="list-style-type: none"> • Conduct at least one awareness session annually for employees and contractors on platforms available to raise and report grievances. • Provide feedback within the timelines stipulated in the Kumba Incidents and Grievance Procedure, when formal grievances have been lodged. <p>Through these actions, we seek to reinforce trust in our grievance processes, ensure timely resolution of issues, and uphold our commitment to fair and responsible business practices.</p>

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>Anglo American has introduced a Responsible Sourcing Standard for Suppliers in 2024. Section 3.5 references "Permit freedom of association and allow unrestricted access to confidential grievance mechanisms".</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 it related to direct employees of the mine only. Subsequent to that initial assessment, the related IRMA requirements and the term "operating company" has been interpreted as applying to the Company and its suppliers / contract employers and all workers, both direct employees of the mine and contract workers. As this was not 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 requirements related to these issues have not been re-rated at this time.</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. However, surveillance audit worker interviews continue to indicate that discrimination and intimidation of contract workers by direct employees remains a persistent issue requiring ongoing attention since contract workers make up a majority of Sishen's workforce. Despite communications campaigns, contract workers indicate a reduced interest in utilizing the Living with Dignity Hub, especially if their already tenuous job security could be impacted. With these outstanding concerns, this requirement remains at a rating of Substantially Meets, subject to further review during the next audit</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"> • 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. • Continue providing Bullying, Victimization, and Harassment training. • Communicate high-level, sanitized results to employees and contractors. <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: 4.1.5.6

Requirement	Comment on Progress	Feedback from Sishen
<p>On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d. Inform the management review to facilitate continual improvement (see 4.1.5.8). 	<p>Since the initial audit, which highlighted uncertainty about whether the mine evaluates the performance of other (non-mineral) waste facilities, Sishen has scheduled inspections and monitoring for waste management facilities beyond tailings, including the on-site waste yard and landfill. Findings from these inspections were incorporated into management reviews and used to update risk management processes and OMS documentation.</p> <p>However, new concerns were noted during the surveillance audit, related to significant quantities of recyclable materials in landfill cells, in contrast with the mine's recycling and waste segregation programs, as well as their goal to send zero waste to landfill. The noted evidence suggests that there is a gap in this process with regard to the waste landfill, therefore the critical requirement should remain "Substantially Meets."</p>	<p>Continue monitoring waste facilities through the mechanisms such as inspections. Continue to implement Visible Felt Leadership process to ensure oversight of management routines. Continue raising awareness regarding waste management practices.</p>