

Kolomela Audit Packet

March 2024



Initiative for Responsible
Mining Assurance



IRMA

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

Kolomela and Sishen achieve IRMA 75

27 Mar 2024 – Today the Initiative for Responsible Mining (IRMA) released the audits of Kumba Iron Ore’s Kolomela and Sishen iron ore operations against the IRMA Standard for Responsible Mining. Independent audit firm ERM-CVS assessed both operations at IRMA 75 when measuring their performance against the Standard’s best practice social and environmental criteria. Kumba Iron Ore is an Anglo American subsidiary.

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

“The information stakeholders need to decide what’s going well — and what may require more attention.”

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

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

“These mines began audits during the early COVID years. Their timelines were delayed by travel challenges, and then the company’s decision to use the optional corrective action period to make improvements. The public has long awaited opportunity to review the information included here, and we applaud Anglo American for volunteering these mines for audit against such comprehensive criteria.” **Ms. Boulanger went on to say**, “That said, the IRMA Standard is relatively new for companies that volunteer to be audited, and even our accredited auditors are still learning. The same is true for community members and workers who are interviewed as part of the process, some of whom may not yet feel comfortable engaging. So, the Kolomela and Sishen audits need to be read with this in mind.”

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

IRMA Initiative for Responsible Mining Assurance

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

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

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

Mpumi Zikalala, Chief Executive for Kumba Iron Ore said, “Our achievement of IRMA 75 for Kolomela and Sishen mines is testament to the hard work of our teams. The result is informed by evidence from a diverse range of stakeholders including employees, governments, NGOs, and communities alike. This invaluable input will drive our ongoing efforts to enhance sustainability performance. Achieving excellent results in IRMA audits serves as recognition and proof of our commitment to high standards, best practices, transparency and assurance.”

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

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

4 April Webinar

WHAT: Learn about the meaning of the audit results, and how stakeholders can make use of the increased transparency an IRMA audit provides. All registrants will receive a webinar recording. Scheduled for 1 hour, the webinar will reserve at least 30 minutes for Q&A.

WHO:

- IRMA Executive Director Aimee Boulanger
- IRMA Africa Regional Lead Davidzo Muchawaya

IRMA Initiative for Responsible Mining Assurance

- Kumba Iron Ore Head of Corporate Affairs Pranill Ramchander
- IRMA Assurance Director Michelle Smith

WHEN: Thursday, 4 April, 2pm South Africa time

HOW: Register at <https://responsiblemining.net/kolomela-sishen-release-webinar>

For More Information:

- Alan Septoff, +1.301.202.1445, aseptoff@responsiblemining.net
- Kolomela audit packet: <https://responsiblemining.net/kolomela-packet>
- Sishen audit packet: <https://responsiblemining.net/sishen-packet>
- Kolomela IRMA audit page: <https://responsiblemining.net/kolomela>
- Sishen IRMA audit page: <https://responsiblemining.net/sishen>

SUMMARY OF FINDINGS

MINE SITE

Kolomela Mine

OPERATING COMPANY

Sishen Iron Ore Company

COUNTRY OF OPERATION

South Africa

MARCH 2024

Audit Details

Name of Mine:	Kolomela Mine
Operating Company:	Sishen Iron Ore Company
Mine Owner:	Anglo American
Country of Operation:	South Africa
Mined Material(s):	Iron Ore
# Employees / contractors:	1350 employees / 2901 contractors at the time of audit
IRMA audit page	https://responsiblemining.net/kolomela
Audit Type:	Initial IRMA Verification Audit
Audit Dates:	Stage 1: 20 August – 26 October 2021 Stage 1.5 virtual: 6 – 9 December 2021 Stage 2: 22 – 25 March 2022 Follow-up Assessment: 17 – 20 April 2023
Audit Team:	Lead Auditor (1) Social Auditors (2) Environmental, Health, and Safety Auditors (2) Support team members (3)
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) as presented during the Stage 1 and Stage 2 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	Kolomela operations and facilities, including an open pit mine, crusher, beneficiation (gravity separation, cyclone and drum), tailings storage facilities, and waste rock disposal areas.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
Audit firm:	ERM CVS
Audit firm technical reviewer:	Glenn Keays
Decision date:	26 March 2024
IRMA Reference Number:	IRMA-STD-ERM-001-V-3448.IRMA1

Summary of Findings

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

Audit Outcome

The site is recognized as having achieved the level of IRMA 75 based on the performance recorded as a result of the Stage 1 and Stage 2 audit activities.

Scores by IRMA Standard Principle and Chapter

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

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 1: Business Integrity		98	114	86%
Chapter 1.1—Legal Compliance	Yes	12	14	86%
Chapter 1.2—Community and Stakeholder Engagement	Yes	26	28	93%
Chapter 1.3—Human Rights Due Diligence	Yes	27	28	96%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	20	22	91%
Chapter 1.5—Revenue and Payments Transparency	Yes	13	22	59%
Principle 2: Planning for Positive Legacies		107	134	80%
Chapter 2.1—Env/Soc Impact Assessment and Managem't	Yes	44	58	76%
Chapter 2.2—Free, Prior and Informed Consent	No	-	-	-
Chapter 2.3—Community Support and Benefits	Yes	13.5	16	84%
Chapter 2.4—Resettlement	No	-	-	-
Chapter 2.5—Emergency Preparedness and Response	Yes	11.5	12	96%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	38	48	79%
Principle 3: Social Responsibility		169.5	192	88%
Chapter 3.1—Fair Labor and Terms of Work	Yes	57.5	62	93%
Chapter 3.2—Occupational Health and Safety	Yes	40	46	87%
Chapter 3.3—Community Health and Safety	Yes	16.5	22	75%
Chapter 3.4—Conflict-Affected and High-Risk Areas	No	-	-	-
Chapter 3.5—Security Arrangements	Yes	25.5	30	85%
Chapter 3.6—Artisanal and Small-Scale Mining	No	-	-	-
Chapter 3.7—Cultural Heritage	Yes	30	32	94%

Principle 4: Environmental Responsibility		141	168	84%
Chapter 4.1—Waste and Materials Management	Yes	45.5	52	88%
Chapter 4.2—Water Management	Yes	26	38	68%
Chapter 4.3—Air Quality	Yes	17.5	18	97%
Chapter 4.4—Noise and Vibration	Yes	9.5	16	59%
Chapter 4.5—Greenhouse Gas Emissions	Yes	14	14	100%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	28.5	30	95%
Chapter 4.7—Cyanide Management	No	-	-	-
Chapter 4.8—Mercury Management	No	-	-	-

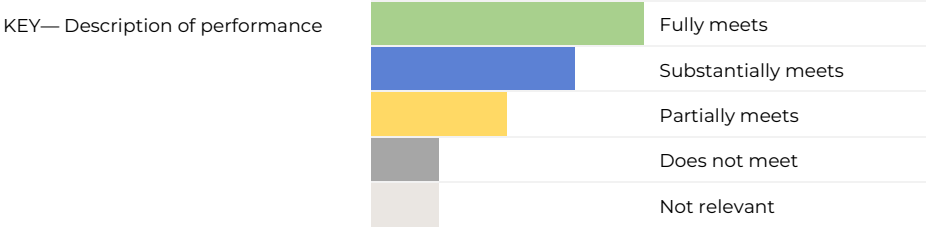
* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials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

Chapters deemed Not Relevant do not factor into the Principle Scores.

Performance on Critical Requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve full certification (IRMA 100) mines 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.

Snapshot of Performance on 40 Critical Requirements







Performance on 40 Critical Requirements

RATING LEGEND









Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant



Principle 1: Business Integrity

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

Principle 2: Planning for Positive Legacies

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

Principle 3: Social Responsibility

3.1.2.1	Workers' freedom of association is respected.	
3.1.3.3.	Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	

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

Principle 4: Environmental Responsibility

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

March 2024

Questions & Answers

IRMA audits of Anglo American's Kolomela and Sishen Iron Ore Mines

Do IRMA audits certify these mining operations as "responsible"?

IRMA audits do not "certify" nor do they declare at what point a site becomes "responsible" or "sustainable." The IRMA system is built to facilitate transparent conversation about mine impacts, at a table where civil society and labor have voice equal to the private sector, and to create greater value to the reduction of harm. The IRMA process also creates incentives for reducing waste, supporting a circular economy, addressing inequity in the use and benefits of mined materials, and supporting innovation that reduces the need for new extraction

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

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

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

A lack of specificity and clear reporting creates opacity and potential risks, as it becomes difficult to objectively assess which mine's operations truly align with best practice. Transparency is the first critical step

toward the IRMA's ultimate goal: to drive improved practices in mining.

Does an IRMA audit mean that a mine or a waste impoundment is "safe"?

An IRMA audit doesn't declare a waste impoundment or a mine "safe" or "unsafe". An IRMA audit measures how an operation's performance compares to best practices at a moment in time, and transparently reports the results to the public. The audit reports provide unprecedented transparency so that stakeholders can make informed decisions about what actions to take regarding a mining operation.

The IRMA Standard has 26 chapters, one of which focuses on waste management. Chapter 4.1 contains 28 requirements that address the risks that tailings and other mine waste (e.g. waste rock piles), present to affected communities, the ecosystems they rely on, and worker safety. Because of recent waste disasters, IRMA is reviewing closely this chapter, and tracking the work of the Global Industry Standard on Tailings Management, to integrate into IRMA's ongoing Standard update the latest best-practices that affirm human safety as the foremost priority in waste management.

What does IRMA 75 mean?

IRMA 75 means a mine has been independently audited and met 75% of the requirements within each of the four principle areas of the IRMA Standard—business integrity, positive legacies, and social and environmental responsibility. [A mine receiving IRMA 75 must meet all of IRMA's critical requirements.](#)

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

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

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

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

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

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

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

commitment to all stakeholders and Indigenous rights holders.

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

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

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

How can governments/regulators use this report?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

If you have questions about the mining operations' practices, we encourage you to contact: Pranill Ramchander, Executive Head of Corporate Affairs: Pranill.ramchander@angloamerican.com, or Benjie Moremi, Social Performance Specialist: Benjie.moremi@angloamerican.com.

If you have questions about the process that auditors followed or the evidence they reviewed, contact the audit firm ERM CVS at post@ermcvs.com

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

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

What are the next steps for Anglo American and for IRMA?

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

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

For more information

IRMA Kolomela audit page:
<https://responsiblemining.net/kolomela>

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

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

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

Or visit responsiblemining.net

JUNE 2023

Background

IRMA's assessment process

The IRMA independent mine assessment process

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

How the IRMA mine audit process works

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

Steps in the IRMA assessment process

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

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

IRMA recognizes four levels of achievement

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

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

For a complete description of the IRMA assessment process and achievement levels, please visit our website: responsiblemining.net.

Providing feedback to the mining company or IRMA

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

For more information

Aimee Boulanger, Executive Director
Initiative for Responsible Mining Assurance (IRMA)
contact@responsiblemining.net
Or visit responsiblemining.net

MINE SITE ASSESSMENT
PUBLIC SUMMARY REPORT

MINE SITE

Kolomela Mine

OPERATING COMPANY

Sishen Iron Ore Company

COUNTRY OF OPERATION

South Africa

26 MARCH 2024

Acknowledgements

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

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

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Audit Details

Name of Mine:	Kolomela Mine
Operating Company:	Sishen Iron Ore Company
Mine Owner:	Anglo American
Country of Operation:	South Africa
Mined Material(s):	Iron Ore
# Employees / contractors:	1350 employees / 2901 contractors at the time of audit
IRMA audit page	https://responsiblemining.net/kolomela
Audit Type:	Initial IRMA Verification Audit
Audit Dates:	Stage 1: 20 August – 26 October 2021 Stage 1.5 virtual: 6 – 9 December 2021 Stage 2: 22 – 25 March 2022 Follow-up Assessment: 17 – 20 April 2023
Audit Team:	Lead Auditor (1) Social Auditors (2) Environmental, Health, and Safety Auditors (2) Support team members (3)
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) as presented during the Stage 1 and Stage 2 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	Kolomela operations and facilities, including an open pit mine, crusher, beneficiation (gravity separation, cyclone and drum), tailings storage facilities, and waste rock disposal areas.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
Audit firm:	ERM CVS
Decision date:	26 March 2024
IRMA Reference Number:	IRMA-STD-ERM-001-V-3448.IRMA1

1. Mine Site Overview

1.1. Overview of Location

The Kolomela Mine is situated in the Tsantsabane Local Municipality, within the ZF Mgcawu District Municipality of the Northern Cape Province, South Africa. The Mine is surrounded by agricultural land, land used for game farming and conservation, and the town of Postmasburg. Located 10 km northeast of the Mine, Postmasburg had a population of 30,089 in 2011, in comparison with the greater Tsantsabane Local Municipality which had a population of 35,093 in 2011¹. Smaller communities close to the Mine include Jenn-Haven and Metsimatala, both approximately 30 km northeast of the Mine, while Griekwastad and Campbell are 60 km and 80 km southeast of the Mine

The Kolomela Mine falls within the Kuruman Mountain Bushveld and the Postmasburg Thornveld. The site is located in the Orange River Primary Drainage Region. The general area is considered flat, with a few ephemeral rivers traversing the mining boundary. The main streams in the vicinity of the mine are the Groenwaterspruit which flows along the eastern boundary of the mine. Tributaries of the Soutloop River flow from the northeast to southwestern sections of the mining area forming which is locally referred to as the Welgevondenspruit. A tributary of the Soutloop River also flows from north to south through the Mine Boundary.²

The geohydrological regime for the Kolomela Mine is made up of two main aquifer systems. The first, the upper, unconfined to semi-confined aquifer occurs in the calcrete that cover most of the surface area of Kolomela. Although relative low yields occur in this aquifer, it is developed widely throughout most of the region and has been the sole reliable source of water supply to most of the farms in the area for more than a century. The second aquifer is within the consolidated bedrock.³

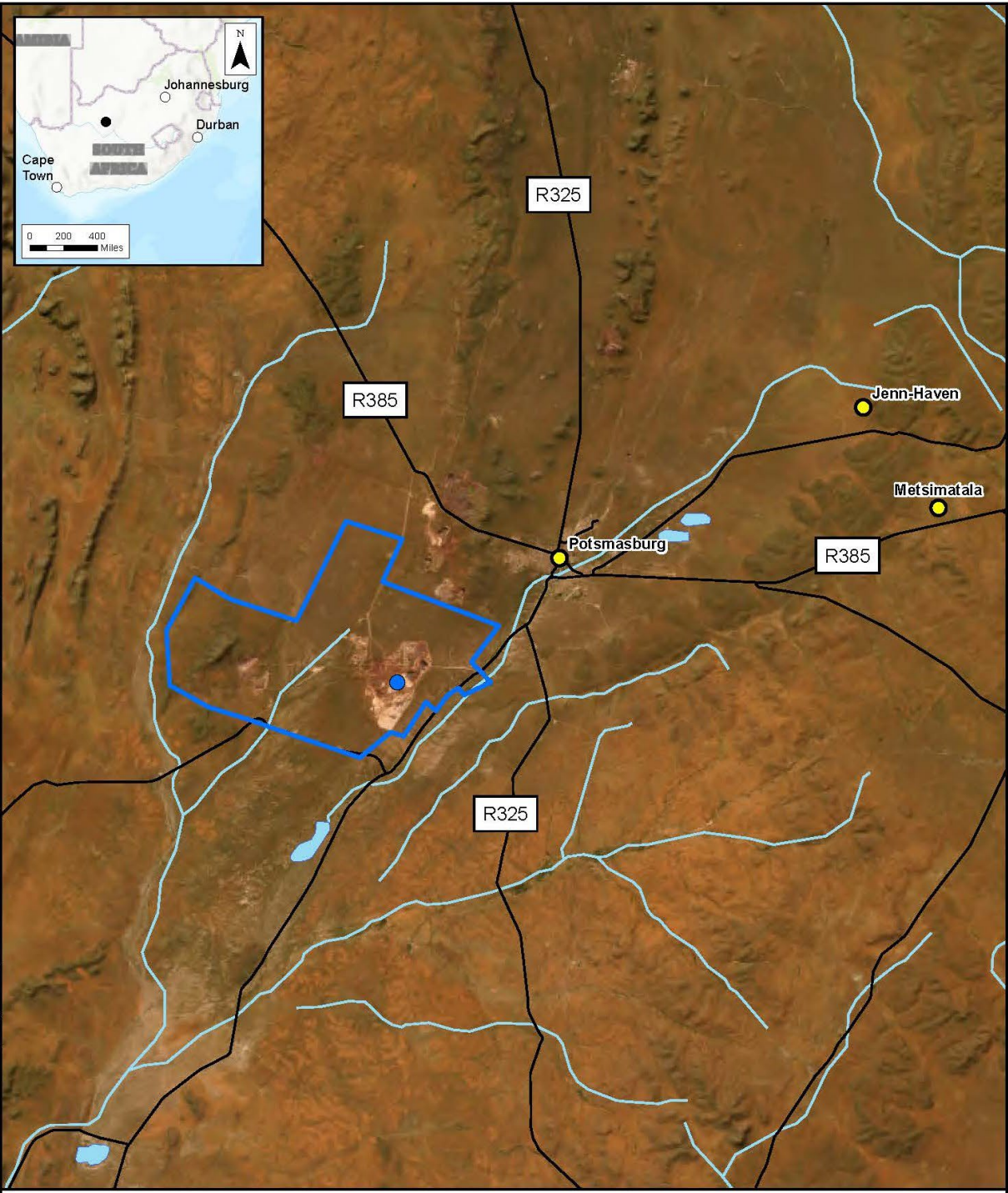
¹ StatsSA, 2011, Statistics South Africa, 2011 Census.

² SLR, 2016, Environmental Impact Assessment Report and Environmental Management Programme Report Kolomela Mine Amendment: Expansion of Activities at Kolomela Mine.

³ Ibid.

Drawn By: Jonathan Haller

M:\US\Projects\AA\Anglo_American\AA\IRMA\src\GIS\AA_IRMA.aprx\Figure 1 Project Location Kolomela Mine - REVISED: 03/22/2024 - SCALE: 1:1,366,211 when printed at 8.5x11



- Legend**
- Kolomela Mine
 - Surface Rights
 - Stream/River
 - Water Body

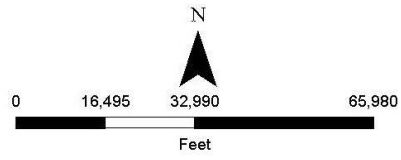


Figure 1
Project Location
 AA IRMA Kolomela Mine
 Anglo-American
 North Cape, South Africa



Source: Esri - World Topographic Map, GCS WGS 1984

1.2. Overview of Operation

The Sishen Iron Ore Company's Kolomela Mine operates in the Northern Cape province near Postmasburg, South Africa. The Sishen Iron Ore Company started operations in December 2011. The mine is operated by the Anglo-American group company Kumba Iron Ore through its subsidiary Sishen Iron Ore Company (SIOC). SIOC is 76.3% owned by Kumba Iron Ore (KIO). Exxaro Resources Limited owns 20.6% of the remaining shares, and the SIOC Community Development Trust owns 3.1%. KIO is 69.7% owned by Anglo American. Industrial Development Corporation owns 12.9% of the shares, with the remaining shares owned by minority shareholders. Kolomela Mine itself is 100% owned by SIOC. The mine currently operates 24 hours a day, 365 days a year.

The Kolomela Mine is an open-pit iron ore mine which produces approximately 9 million tonnes of iron ore per annum (Mtpa). The current life of mine (LOM) plan is until 2038 and involves mining from the existing four pits, namely the Leeuwfontein Pit, Klipbankfontein Pit, and the Kapstevl North and South Pits. Existing processing facilities involve a 9 Mtpa Direct Shipping Ore (DSO) operation, including crushing and screening of recovered ore material into stockpiles of 'lump' and 'fines' for transportation by rail to Saldanha Bay.

The Kolomela mine uses the conventional open-pit mining method that includes drilling, blasting, shovel-and-truck loading and hauling for the extraction of ore. Once extracted, the ore is sent to the processing plant where it goes through multiple levels of crushing before being screened and sent to the stockyard. Commissioned in 2011, the Tailings Facility, which is comprised of the Tailings Storage Facility (TSF) and Return Water Dam (RWD), receives ultra fine dust tailings from plant dust scrubbers and returns clarified supernatant and seepage water to the plant process. The mine utilizes a stacker-reclaiming facility, where different grades of processed ore are blended to ensure grade requirements. The final shipment of the ore is sent out by a conveyor to the load-out terminal of the mine and then transported via rail to the Saldanha Bay Port.

In 2021, the number of full-time employees at Kolomela Mine was 1,350, of which, 417 were female and 933 were male. That same year, there were a total of 2,901 full-time and seasonal contract workers at Kolomela Mine and of those, 481 were female, and 2,420 were male. The primary languages spoken by workers are English, Setswana, and Afrikaans.

1.2.1. Scope of Activities and Facilities Included in Audit

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

- Four active open pits
- Waste rock dumps including stockpiles
- Tailings' facilities
- Beneficiation plant
- Ancillary infrastructure

2. Mine Site Assessment Process

2.1. Overview of IRMA Process

The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).⁴ When the self-assessment has been completed, the independent, third-party assessment may begin.

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

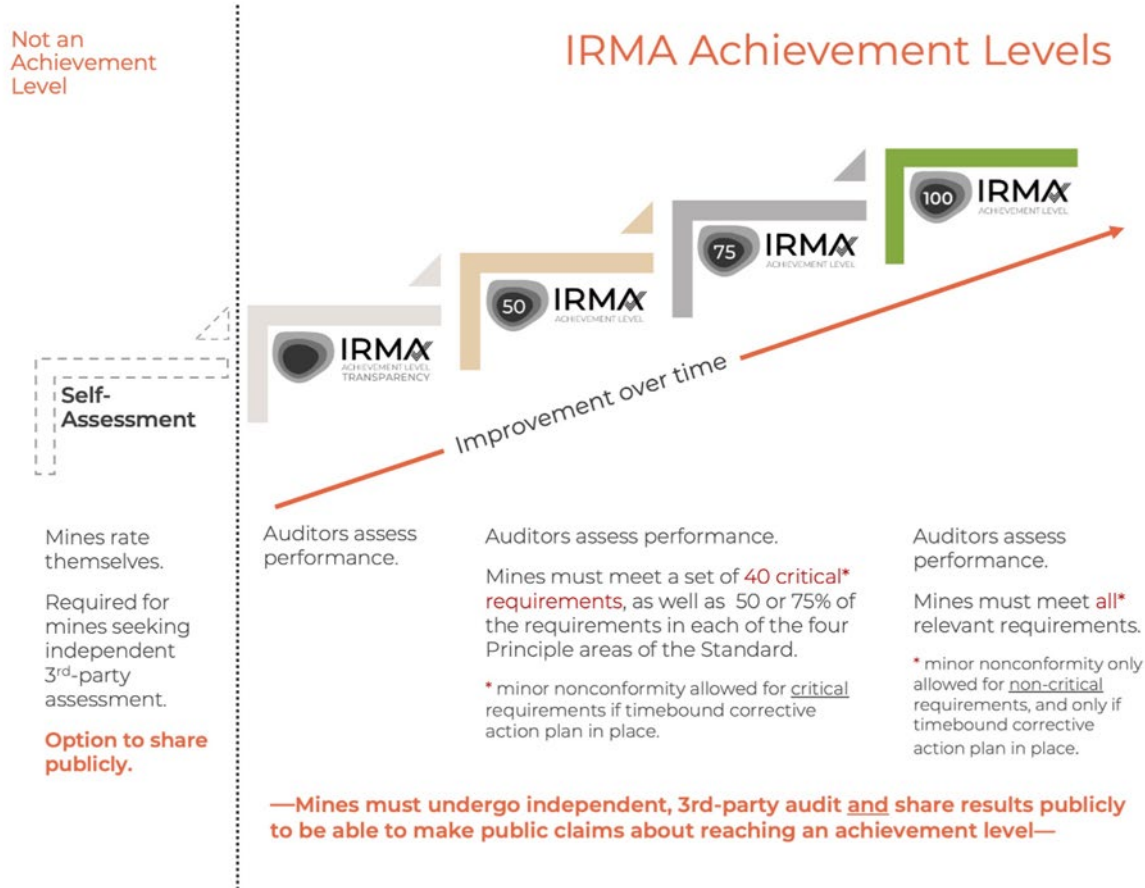
Stage 2 is the on-site visit, which includes facility and site-based observations, additional review of materials and interviews with mine site personnel, workers, stakeholders and meetings with affected communities.

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

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.⁵

⁴ <https://tools.responsiblemining.net/self-assess/>

⁵ All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version (IRMA Certification Body Requirements, v.2.1) is available at: <https://responsiblemining.net/wp-content/uploads/2023/08/IRMA-Certification-Body-Requirements-V2.1.pdf>



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 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 visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

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

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

2.1.2. IRMA Complaints Process

If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the [IRMA website](#). Details on the complaints process can be found in [IRMA's Issues Resolution Procedure](#).

2.2. Audit Process and Timeline

- Anglo American completed the initial self-assessment for Kolomela Mine in June and July 2021.
- ERM CVS carried out an initial Stage 1 desktop audit from 20 August – 27 October 2021.
- ERM CVS carried out a limited scope virtual audit from 6 – 9 December 2021, as the planned Stage 2 assessment could not go ahead due to disruptions caused by the COVID-19 Omicron outbreak.
- ERM CVS conducted a Stage 2 on-site audit from 22 – 25 March 2022.
- Kolomela elected to use an IRMA-allowed early corrective action period to address certain shortfalls identified in the audit, which then required verification by ERM CVS.
- ERM CVS conducted a follow-up assessment from 17 – 20 April 2023 to verify Kolomela's corrective actions.

The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, governmental agencies (see Section 2.3), documentation review, and visits to operational areas (see Section 2.4), and communities.

2.3. Stakeholder Engagement

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

Thirty days prior to the on-site assessment, the Stage 2 Assessment was announced on the ERM CVS website, [IRMA's website](#), and through IRMA's free email distribution newsletter. The announcement included an invitation to stakeholders to participate in the assessment. Further, ERM CVS prepared a similar announcement in Sepedi. Kolomela placed ERM CVS's announcement on community notice boards and sent it to local media to inform stakeholders about the audit and their opportunity to participate in the audit process. Both the English and Sepedi announcement were posted on the ERM CVS website. Kolomela also made an announcement on Anglo radio to inform stakeholders about the audit and their opportunity to participate.

2.3.1. Written comments/inquiries

ERM CVS received an email from a steel manufacturing company, requesting to be kept informed of the outcomes of the Kolomela IRMA Assessment. In addition, a number of requests to be kept informed about the assessment came from community members.

A letter was received from one stakeholder noting that Kolomela has failed to create local procurement opportunities or support local businesses. This has been considered in the assessment of Community Support and Benefits, Chapter 2.3.

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.

Table 1. Mine Staff Interviews

Position/Role
Specialist Risk and Audit
Communications Specialist
Acting Social Performance Specialist
Practitioner Social Governance and Standards
Specialist Operational Finance Processing
SED Specialist
Section Manager Security and Emergency
Environmental Advisor
Section Manager Environment
Manager Employee Relations
Manager SHE
Principal Community ENG and DEV
Principal Stakeholder Engagement
Social Performance Principal
Manager Commercial, Finance and Administration
Specialist Company Secretariat
Specialist Occupational Medical Practitioner
Specialist ER, Human Resources
Section Manager, Human Resources

2.3.3. Workers/Contractors

ERM CVS went through a process to select workers to interview, and once interviewees were selected, Anglo American assisted with logistics to ensure that workers were available for interviews at the requested times and that the interview location was accessible to workers at the time of the interview. Interviews included employees and contractors from several different departments, chosen to represent different age groups; genders; years of experience; work groups, and operational, administrative, health care or union responsibilities. Topics discussed included working conditions, with specific attention on women and vulnerable groups, freedom of association, health, and safety, etc. The

engagements took place on-site at various locations in designated conference rooms and offices. The worker interviews were conducted without Anglo American management personnel present. Supervisory staff were interviewed individually. However, they did not participate in any group meetings so as not to bias or influence employee responses.

Stage 1.5 Worker Interviews

During the Stage 1.5 Virtual Assessment, ERM CVS conducted 8 individual worker interviews virtually. Kolomela site representatives set up the calls in a small conference room and provided support to those joining the call to make sure they were connected with ERM CVS before leaving the room.

Table 2. Stage 1.5 Workers Interviews

Date	Meeting Type	Number of Attendees	Female / Male	Role/Position
7 December 2021	Individual	1	1 M	Environmental Technician
7 December 2021	Individual	1	1 M	Advisor, Enterprise Development
7 December 2021	Individual	1	1 F	Youth development program
7 December 2021	Individual	1	1 M	Instrumentation Technician
7 December 2021	Individual	1	1 M	Millwright
7 December 2021	Individual	1	1 F	Engineering Shop Supervisor
7 December 2021	Individual	1	1 F	SHE Department – hygiene specialist
7 December 2021	Individual	1	1 F	Millwright
Total		8		

Stage 2 Worker Interviews

During Stage 2, ERM CVS conducted a total of 33 scheduled worker engagements including 17 individual employee and contractor interviews and 5 group interviews (two to six people). Scheduled worker interviews were supplemented by additional impromptu interviews with 23 individuals or groups, in various mine work sites during the EHS audit process, for a total of 56 workers interviewed during Stage 2.

Table 3. Stage 2 Workers Interviews

Date	Meeting Type	Number of Attendees	Female / Male	Role/Position
22 March 2022	Individual	1	1 M	Crusher Control Room Operator
22 March 2022	Group	3	2 F 1 M	Plant workers (intern, workers)
23 March 2022	Individual	1	1 F	Grade Control Coordinator
23 March 2022	Individual	1	1 F	Business Improvement Intern
23 March 2022	Individual	1	1 M	Skills Learner
23 March 2022	Individual	1	1 F	Line advisor
23 March 2022	Group	3	3 M	Security workers
23 March 2022	Group	3	2 F 1 M	General workers
23 March 2022	Group	2	2 M	General workers
23 March 2022	Individual	1	1 M	
23 March 2022	Individual	1	1 M	HME assistant
23 March 2022	Group	5	1 F 4 M	Emergency Response Staff (Base Manager, EMTs)
24 March 2022	Individual	1	1 F	Operations Manager Postmasburg Care Clinic
24 March 2022	Individual	1	1 F	Nurse Manager Postmasburg Hospital
24 March 2022	Individual	1	1 F	Doctor Postmasburg Hospital
24 March 2022	Individual	1	1 F	Managing Doctor Postmasburg Hospital

Date	Meeting Type	Number of Attendees	Female / Male	Role/Position
24 March 2022	Individual	1	1 F	X-Ray Technician Mine OH Facility
24 March 2022	Individual	1	1 F	Vision Technician Mine OH Facility
24 March 2022	Individual	1	1 F	Hearing Technician Mine OH Facility
24 March 2022	Individual	1	1 F	Occupational Therapist Mine OH Facility
24 March 2022	Individual	1	1 M	OMP Mine OH Facility
24 March 2022	Individual	1	1 F	Operations Manager Mine OH Facility
Total		33		

In total, ERM CVS conducted 41 scheduled interviews during Stage 1.5 and Stage 2. Site logistics created a barrier to meeting the IRMA expectation of 45 worker interviews (based on the size of the site) during the Stage 2 assessment. In planning for worker interviews the site provided auditors with a central location in an administrative building for workers to report to, however, in some instances workers did not show-up for scheduled interviews do to logistical and time constraints.

In some instances it was unclear whether the coordination between Human Resources staff and supervisors was adequate to ensure workers were released from their duties, or whether the intention of the interview had been clearly communicated. This was further impacted by stringent social distancing restrictions due to the COVID-19 pandemic. These barriers were raised early in the Stage 2 audit process and to some degree affected both the worker and external stakeholder interview process.

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

2.3.4. Government Agencies

ERM CVS conducted interviews with government agency representatives identified as having authority over or a relationship with Kolomela Mine. The interviews were conducted without Kolomela mining personnel present.

Table 4. Government Agencies Interviews

Government Institution
Tsantsabane Municipality / Executive Mayor
Joint Operations Committee - Local Municipality security committee
South Africa Department of Mineral Resources
South Africa Department of Environmental Affairs
South Africa Police Force
Tsantsabane Municipality Labour Desk

2.3.5. Participating Communities and NGOs

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

During the Stage 2 audit, Kolomela provided a brief orientation vehicle tour of the area surrounding the Mine, including informal settlements and projects that had been supported by the mine. During the Stage 2 audit, ERM CVS conducted community meetings with several communities near the mine or with the potential to be impacted by the mine including resettled communities and farmers associations. The stakeholders were selected based on the stakeholder mapping and the outcomes of the Stage 1 audit. Meetings were held in or near the communities in meeting locations typically used by the community to facilitate ease of access. Where required, transport to meeting sites was provided by Kolomela. Meetings were held in the locations identified below and varied in size with one to four community representatives, to discussions with ten participants. Communication and organization of the meetings was facilitated by Kolomela mining personnel but were conducted by ERM CVS auditors without Kolomela mining personnel present.

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

Community, NGO Name	Location	Total Number of Attendees
Horrison Media House	Postmasburg	1
JOC and Agri Postmasburg	Postmasburg	1
Community Police Forum Chairperson	Postmasburg	1
Community NGOs	Postmasburg	9
Community senior citizens	Postmasburg	6
Small business owners	Postmasburg	10
Community members	Postmasburg	3
Total		31

2.4. Summary of Mine Facilities and Other Areas Visited

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

Operational areas	Tailings Facility Plant and Chemicals Handling Storage Areas Crusher Mine Operations / Pit Areas Pit – Drilling
Other areas visited (e.g., downstream watercourses, off-site facilities)	Iron Room – Offices Emergency Response Facility Health Clinic
Surrounding Communities	Postmasburg Community

3. Summary of Findings

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

3.1. Audit Outcome

The site is recognized as having achieved the level of IRMA 75 based on the performance recorded as a result of the Stage 1 and Stage 2 audit activities.

3.2. Scores by IRMA Standard Principle and Chapter

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

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 1: Business Integrity		98	114	86%
Chapter 1.1—Legal Compliance	Yes	12	14	86%
Chapter 1.2—Community and Stakeholder Engagement	Yes	26	28	93%
Chapter 1.3—Human Rights Due Diligence	Yes	27	28	96%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	20	22	91%
Chapter 1.5—Revenue and Payments Transparency	Yes	13	22	59%
Principle 2: Planning for Positive Legacies		107	134	80%
Chapter 2.1—Environmental and Social Impact Assessment and Management	Yes	44	58	76%
Chapter 2.2—Free, Prior and Informed Consent	No	-	-	-
Chapter 2.3—Community Support and Benefits	Yes	13.5	16	84%
Chapter 2.4—Resettlement	No	-	-	-
Chapter 2.5—Emergency Preparedness and Response	Yes	11.5	12	96%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	38	48	79%
Principle 3: Social Responsibility		169.5	192	88%
Chapter 3.1—Fair Labor and Terms of Work	Yes	57.5	62	93%
Chapter 3.2—Occupational Health and Safety	Yes	40	46	87%
Chapter 3.3—Community Health and Safety	Yes	16.5	22	75%
Chapter 3.4—Conflict-Affected and High-Risk Areas	No	-	-	-
Chapter 3.5—Security Arrangements	Yes	25.5	30	85%
Chapter 3.6—Artisanal and Small-Scale Mining	No	-	-	-
Chapter 3.7—Cultural Heritage	Yes	30	32	94%

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 4: Environmental Responsibility		141	168	84%
Chapter 4.1—Waste and Materials Management	Yes	45.5	52	88%
Chapter 4.2—Water Management	Yes	26	38	68%
Chapter 4.3—Air Quality	Yes	17.5	18	97%
Chapter 4.4—Noise and Vibration	Yes	9.5	16	59%
Chapter 4.5—Greenhouse Gas Emissions	Yes	14	14	100%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	28.5	30	95%
Chapter 4.7—Cyanide Management	No	-	-	-
Chapter 4.8—Mercury Management	No	-	-	-

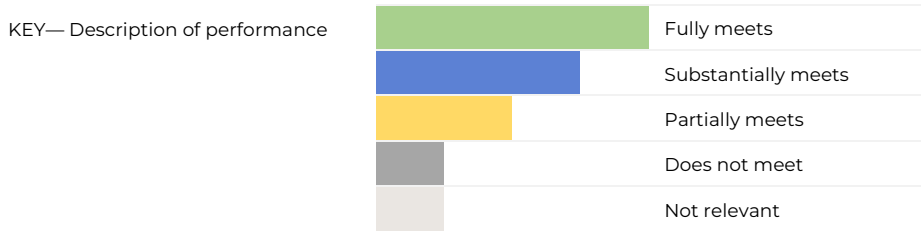
* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials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

Chapters deemed Not Relevant do not factor into the Principle Scores.

3.3. Performance on Critical Requirements

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

3.3.1. Snapshot of Performance on 40 Critical Requirements










3.3.2. Performance on 40 Critical Requirements

RATING LEGEND









Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant



Principle 1: Business Integrity

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

Principle 2: Planning for Positive Legacies

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

Principle 3: Social Responsibility

3.1.2.1	Workers' freedom of association is respected.	
3.1.3.3.	Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	

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

Principle 4: Environmental Responsibility

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

4. Next Steps

4.1. Corrective Action Plans

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

Following the Stage 2 Assessment, the Kolomela Mine prepared a Corrective Action Plan to address major non-conformities with critical and other requirements, with the goal of improving their overall achievement level. ERM CVS conducted a follow-up assessment to verify the implementation of corrective actions to improve performance against the Critical Requirements in April 2023. The findings of the follow-up assessment are included in this Report.

Kolomela is expanding the Corrective Action Plan to address additional performance areas, with the goal of improving performance during the formal 3-year audit cycle. A copy of the plan is provided as Appendix B.

4.2. Disclosure of Summary Audit Report

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

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

4.3. Timing of Future Audits

The IRMA system is a three-year cycle, meaning that an operation goes through a reverification assessment every three years, with an interim assessment as required within 18 months of each full assessment. Kolomela's surveillance audit will take place no more than 18 months after the initial IRMA Assessment Report is published, (this Assessment).


APPENDIX A—Results by Requirement

Principle 1: Business Integrity

RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant



Requirement #	Requirement Text	Rating	Basis for rating
Chapter 1.1—Legal Compliance			
1.1.1.1.	Critical The operating company shall comply with all applicable host country laws in relation to the mining project.		<p>As part of the organization’s management systems, a legal register has been developed that identifies all regulatory requirements Kolomela Mine is required to be compliant with. The annual audit report for 2021 was finalized with the service provider in March 2022. All permits and conditions are tracked in the site’s compliance registry, which includes an integrated reminder system with escalation to the applicable manager. The organization has also implemented a permit tracking system, summarizing, and reporting on permit status, renewal schedule, expiration schedule and overdue permits. The system includes identification of permit’s criticality, position in the permitting process flow and the mine’s overall compliance status.</p> <p>Following the Stage 2 follow-up assessment, the mine submitted a document listing all the required laws as identified by the organization. The Group Compliance Monitoring Baseline Audit Report dated 20 Sep 2021 identified non-compliance</p>

Requirement #	Requirement Text	Rating	Basis for rating
			issues related to blasting and explosives, communication, and mining rights. The Permitting Review and Gap Analysis Report for Kolomela Operations dated 25 April 2022 identified a number of expired permits with follow-up comments that these have been renewed. The Kolomela Mine Permit Compliance Audit Report dated 24 Feb 2023 identified a number of compliance issues in the executive summary. Specifically, the report found 15 instances of non-compliance against verified commitments and conditions. Review of "Anglo American - Kumba - Legal Requirements 2023-10-23.xlsx" identified missing regulatory requirements as indicated in the auditor justification statement. Further follow-up discussions with the Mine and review of the aforementioned compliance and permit tracking systems, identified that actions are already in place to resolve these gaps identified in the reports.
1.1.2.1.	The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.	—	No IRMA requirements were found to be in conflict with the host country's laws.
1.1.3.1.	If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring.	☑	Legislative non-conformances were identified during the external legal compliance audit in 2020. The KLM Compliance Obligations 2020 - 2021 internal RV03 FM action plan was reviewed and found that all the non-compliances have been corrected or were in the final stages of being corrected. The Integrated Water Use License (IWUL) audit conducted by EXM Environmental Advisory Services (Pty) Ltd was reviewed. 29 non-compliances were noted. No evidence was submitted to show the close out of the non-conformances.
1.1.4.1.	The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project.	⊕	The site has implemented a contractor management system. However, no information was submitted to verify that the current contractor management system complies with the IRMA requirements.
1.1.5.1.	The operating company shall maintain records and documentation sufficient to authenticate and	⊕	The site has commissioned a number of legal compliance audits, i.e., Integrated Water Use License, the Waste License and Environmental Authorizations, Air Emissions License to name a few. The Group Compliance Monitoring Baseline




Requirement #	Requirement Text	Rating	Basis for rating
	demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard.		<p>Report was conducted to establish compliance with Environment Authorizations issued. No evidence was submitted to show that a plan is in place to close out findings.</p> <p>No other audits to determine the level of compliance with other South African regulatory requirements or IRMA requirements have been conducted.</p> <p>The section 54, 55 & 23 register was reviewed for the period 4 Jan 2021 and 27 July 2021. The summary shows a total of 196 non-compliances, it is not clear from the information in the spreadsheet which were investigated and closed out.</p>
1.1.5.2.	Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors, and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies.	☑	<p>No refusals were made by the site regarding requests to view any documentation i.e., legal audit, inspections, or other information.</p> <p>However, not all the required information was submitted for review i.e. ongoing and final investigations, allegations, discussions, and final remedies.</p>
1.1.5.3.	Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available.	☑	Although no evidence was available of requests made by stakeholders to view legal compliance audit reports, the site informed the auditors that audit reports will be made available to stakeholders upon request.
1.1.5.4.	<p>Where the operating company claims that records or documentation contains confidential business information, it shall:</p> <ol style="list-style-type: none"> Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information. 	☑	No instances of business documents not being available to the auditing team due to claims of confidentiality were encountered during the audit.




Requirement #	Requirement Text	Rating	Basis for rating
Chapter 1.2—Community and Stakeholder Engagement			
1.2.1.1.	The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities.	✔	<p>The site is guided by corporate level policies that require Anglo American mines to undertake meaningful engagement with affected stakeholders, and corporate guidance is provided for stakeholder identification and analysis.</p> <p>The site has in place a Stakeholder Engagement Plan that documents the identification and analysis of project-affected stakeholders.</p>
1.2.1.2.	A stakeholder engagement plan scaled to the mining project’s risks and impacts and stage of development shall be developed, implemented and updated as necessary.	✔	<p>Anglo American corporate policies and guidance require each site to develop a Stakeholder Engagement Plan. The site has in place a Stakeholder Engagement Plan, which has been updated annually since 2019. Feedback on engagement outcomes, and an engagement tracker in the Stakeholder Engagement Plan, as well as “2021 Engagements,” provide evidence of Stakeholder Engagement Plan implementation.</p> <p>A community perception study and political environment are used to update the Stakeholder Engagement Plan. In 2022, will look at results from the Anglo American Social Way audit and community perception survey to update the Stakeholder Engagement Plan. Updates are planned for Q1 annually, and the plan is typically updated in Q3.</p>
1.2.1.3.	The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups).	✔	<p>Anglo American corporate policies and guidance require engagement processes to be inclusive and accessible.</p> <p>Stakeholder feedback is used to inform updates to the Stakeholder Engagement Plan. For example, Ulula community surveys are sent out monthly via WhatsApp, and feedback from the surveys, and from an annual community survey (undertaken every year since 2014), a vulnerability survey, and quarterly engagement are all used to inform the Stakeholder Engagement Plan update.</p> <p>Inclusion of vulnerable groups is done by providing transport to meetings, highlighting, and encouraging them to attend events. The site engagement team also noted that they seek to give vulnerable stakeholders the opportunity to raise concerns and provide comments. Additional outreach is targeted at vulnerable communities, whereby site engagement teams go into vulnerable communities for meetings.</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>Kolomela complete an Indigenous Peoples study in 2020 which was used to update the Stakeholder Engagement Plan as it relates to engagement with the Groenwater Community and the Griqua People.</p> <p>Stakeholders interviewed noted that they generally have good communication with the Mine and noted that the annual stakeholder day is well received as stakeholders enjoy hearing updates from the Mine. Stakeholders also confirmed that engagement is culturally appropriate and considered different languages spoken in the area.</p>
1.2.1.4.	<p>The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or mitigate community conflicts that might otherwise occur as a result of company engagement processes.</p>	<p>☑</p>	<p>The Anglo American Social Way 3.0 requires all operations to define an area of influence. The area of influence is defined in the Social Way 3.0 as the area affected by a site's activities, including direct, indirect and induced impacts, impacts from cumulative effects and unplanned events, the site's primary labor sending area, etc. The area of influence is defined (or revised) every five years (Anglo American Social Way 3.0, Tool 3A, Box 3A.5 The Stakeholder Engagement Plan provides a socioeconomic context for the mine area of influence, including insights on community dynamics and how the mine might be affecting these.</p> <p>Feedback on engagement outcomes and an engagement tracker in the Stakeholder Engagement Plan provide evidence of Stakeholder Engagement Plan implementation. The feedback provided in Kumba Social Way Pack I 31 March 2020 demonstrates ongoing efforts to understand community dynamics.</p> <p>In interviews, it was noted that there have been issues among local business forums and infighting, and the site has made accommodations to engage different groups separately. An engagement forum was created to specifically facilitate engagement with business groups and associations to better understand contentious issues in the area of influence.</p>
1.2.2.1.	<p>Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning)</p>	<p>☑</p>	<p>The site has in place a Stakeholder Engagement Plan, which has been updated annually since 2019. Feedback on engagement outcomes, and an engagement tracker in the SEP, as well as "2021 Engagements," provide evidence of SEP implementation.</p> <p>A community perception study and political environment are used to update the SEP. In 2022, will look at results from AASW audit and community perception survey to update the SEP. Updates are planned for Q1 annually, and the plan is typically updated in Q3.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.2.2.2.	<p>Critical The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ul style="list-style-type: none"> a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account. 		<p>The site has in place a Stakeholder Engagement Plan (SEP), which has been updated annually since 2019. The Stakeholder Engagement Plan indicates that:</p> <ul style="list-style-type: none"> a. Regular timely engagement is taking place b. Evidence reviewed showed the management and subject matter expert participation in engagement activities such as the stakeholder day. c. The Stakeholder Engagement Plan demonstrates consideration of engagement methods with different stakeholder groups, language requirements, and respect for stakeholders. For example, the quarterly environmental forum is held in Afrikaans as the surrounding farmers are predominantly Afrikaans speaking. Presentations are translated as needed. During interviews, the site confirmed that engagements are done in different languages. Booklets for Community Boxes are Setswana, Afrikaans, and English. d. Feedback on engagement outcomes indicates two-way dialog, and the Ulula community surveys demonstrate that the site is soliciting feedback from stakeholders. The site regularly solicits feedback from stakeholders through the Ulula survey and annual community perception surveys. These are provided in different languages. <p>During the stakeholder interviews, some stakeholders reported that they do not know how their feedback is incorporated into socioeconomic development planning and noted that feedback to queries or requests for support on projects or funding is not always provided or provided in a timely manner.</p>
1.2.2.3.	<p>The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project's environmental and social performance, and/or input to the company on issues of concern to stakeholders.</p>		<p>Anglo American corporate policies and guidance require sites to establish a Community Engagement Forum.</p> <p>There was an attempt to establish a Community Engagement Forum in 2019 and engage with the community and to draft Terms of Reference, including non-bias community engagement. The local municipality did not agree with the approach; the site revised the approach, but further implementation was delayed by COVID-19.</p> <p>The site does have an environmental forum that facilitates engagement with surrounding farmers.</p> <p>A Joint Operating Committee was established as an emergency response to COVID-19 that included South African Police Service, health authorities and surrounding mines. As this forum does not represent the community groups and leaders, the site is seeking to establish a Community Engagement Forum. The mine has solicited stakeholder input for this and will continue to engage stakeholders through 2022 for</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>finalization. Evidence review demonstrates clear intent to establish a Community Engagement Forum.</p> <p>An engagement forum was created to specifically facilitate engagement with business groups and associations to better understand contentious issues and business opportunities in the area of influence (See Requirement 1.2.1.4. for a definition of an area of influence).</p>
1.2.2.4.	Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives.	☑	<p>The site Stakeholder Engagement Plan includes the identification and analysis of vulnerable groups, and further information around vulnerability is provided in the Social Impact Assessment. Evidence presented demonstrates that Kolomela seeks to engage stakeholders in a culturally appropriate manner, and effort is made to engage vulnerable groups in an inclusive way.</p> <p>If a stakeholder is identified as vulnerable, a form is completed to understand the vulnerability and how this can be managed to improve inclusivity. For example, some engagements take place in different languages, and some letters go out in a local language and in English. The mine makes efforts to reach vulnerable groups by providing transport for stakeholders from communities to Kathu, where most meetings take place.</p>
1.2.2.5.	When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether or not such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community.	☑	<p>Evidence presented shows that Kolomela engages with local forums and organizations that represent different communities, and that if instances occur where people feel they are not represented by established organizations, Kolomela will engage with alternative groups. The mine has been approached by representative groups wishing to be included as stakeholders; these communities are now being engaged.</p> <p>The stakeholder database included all the local leaders and interests of these stakeholders.</p>
1.2.2.6.	The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.	☑	<p>Evidence presented demonstrates that engagement activity is documented through notes and is tracked, and that feedback is provided to stakeholders.</p> <p>Isometrics is used to track engagement events, upload all the proofs, etc., and also pull the Isometrics into a stakeholder engagement tracking document to analyze the engagements and actions required.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.2.2.7.	The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes.		<p>Evidence presented demonstrates that the site is reporting back to stakeholders through regular stakeholder days, radio broadcasts and newsletters. During stakeholder interviews, some stakeholders reported that they don't get consistent feedback from the mine on issues raised.</p> <p>A grievance register maintains records of grievances raised and the status of grievances and actions taken. Interviews with external stakeholders indicated a perceived lack of transparency and timely feedback.</p>
1.2.3.1.	The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement.		<p>The Anglo American Social Way 3.0 requires all operations to define an area of influence (See Requirement 1.2.1.4. for a definition of an area of influence). Evidence demonstrates capacity building being undertaken on a needs basis for directly affected stakeholders, and on an ongoing basis for broader stakeholders within the area of influence. The Mine has provided training opportunities to make sure stakeholders understand procurement processes and forums.</p> <p>During interviews, an example was shared where presentations were given to stakeholders around cultural heritage. These received better and more engaged responses, and traditional leaders have responded positively. Sites have used the stakeholder day and environmental forum to share the findings with stakeholders.</p>
1.2.4.1.	Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information.	—	This is Kolomela's first IRMA assessment. It is too early in the process to assess the site against this requirement.
1.2.4.2.	If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested.		<p>Evidence demonstrates that reasonable and unreasonable information requests are managed through information sharing, either in meetings or in written responses using a full document or a summary, these will be printed if necessary.</p> <p>Localized procurement issues were centered around requests for information and required more detail. The mine responded by sharing information through the monthly Gamagara Corridor Chamber of Commerce and Industry meetings.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.2.4.3.	Communications shall be carried out and information shall be provided to stakeholders in a timely manner, and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders		<p>Evidence indicates timely and regular engagement with stakeholders, and following protests, the site will provide feedback within a week. Commitments have been made to facilitate a monthly engagement cycle going forward. Evidence provided demonstrates that vulnerability and barriers to engagement are considered in engagement planning and interactions.</p> <p>During external stakeholder interviews, stakeholders noted that the mine don't consistently respond in a timely manner, and there have been instances where requests for funding and support have been made, and the mine has not responded, or has been very slow to respond.</p>
1.2.4.4.	If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information.	—	There was no evidence indicating that the mine has not provided information requested by stakeholders.
Chapter 1.3—Human Rights Due Diligence			
1.3.1.1	Critical The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights		Corporate human rights policy provided with commitment to respect internationally recognized human rights. Evidence of its implementation provided in the Social Management Implementation Plan applying the Social and Human Right Impact and Risk Analysis methodology to the site. The evidence provided indicates staff induction training includes employee equity and human rights. The supplier on-boarding guide also references respect and protection of human rights. Notice provided indicates ongoing compulsory training of staff regarding zero-tolerance for bullying, harassment, and victimization. Interviews with managers and workers confirm the site's efforts to adhere to interfere with international human rights standards in its operations and supply chain.
1.3.1.2.	The policy shall: <ul style="list-style-type: none"> a. Be approved at the most senior level of the company; b. Be informed by relevant internal and/or external expertise; 		The Group Human Rights Policy has been approved at the highest level of the company and informed by relevant internal and external expertise. The expectations of the policy have been demonstrated through staff induction training. Human Rights Policy is available on the corporate website and respect and protection of human rights is included in the Supplier Onboarding Guide. Profiles of competent professionals were provided. A Stakeholder Impact Assessment and Perception Report were provided as evidence reflecting implementation of human rights policy objectives in the site's operational policies and procedures. Notice of Voluntary

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project; d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders; e. Be reflected in the mining project's operational policies and procedures. 		Principles Human Rights and Security E-Training was provided. The contract template includes adherence to Voluntary Principles human rights requirements. Contractors are audited against key performance indicators. Evidence was provided, and through interviews with managers, workers, and community group representatives, confirmed awareness of human rights policies and their active implementation at the site and within the company's supply chain.
1.3.2.1.	Critical The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.	☑	The Workplace Risk Assessment, Social Impact Assessment, and Perception Report were provided. Requested Scope of Work and proposal by competent professional regarding an updated Human Rights Due Diligence Process to be implemented in 2022 were provided. Human rights impacts have been assessed and monitored. The monitoring tool provided includes budget allocations for related initiatives. Interviews with managers and employees confirmed human rights consideration during induction training and a focus on zero-tolerance for bullying, harassment, and victimization during compulsory training sessions for all staff. The contract template includes adherence to Voluntary Principles human rights requirements. Contractors are audited against Key performance indicators. Evidence was provided, and through interviews with managers, workers, and business partners, confirmed awareness of human rights policies and their active implementation at the site and through the company's supply chain.
1.3.2.2.	Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall: <ul style="list-style-type: none"> a. Follow a credible process/methodology; b. Be carried out by competent professionals; and c. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. 	☑	The Social and Human Rights Impact and Risk Analysis process is scaled to the size of the company and the potential severity of human rights risks. It follows a credible methodology developed and carried out by competent professionals. Identified risks and vulnerabilities of communities are rated and the list of risks is evaluated in terms of their severity. Evidence presented confirms consultations with stakeholders in April and October 2021. There is evidence of credible external expertise used in human rights due diligence reporting. Scope of Work and proposal for update Human Rights Due Diligence Process (2022) was provided. A Vulnerability Assessment (systemic) was undertaken in 2021.
1.3.2.3.	As part of its assessment, the operating company shall document, at minimum:	☑	A corporate human rights policy and Social Way 3.0 Toolkit 3C Social and Human Rights Impact and Risk Assessment (SHIRA) document provide a thorough assessment methodology. The process considers norms and applicable laws and

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> a. The assessment methodology; b. The current human rights context in the country and mining project area; c. Relevant human rights laws and norms; d. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk; e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group; f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. 		<p>creates a comprehensive list of human rights risks. A Stakeholder Impact Assessment Perception Report demonstrates stakeholder participation in the assessment process. Workplace Risk Assessment and Control and socio-economic development presentations document implemented mitigations in consultation with stakeholders. Interviews with managers, workers and stakeholders highlight efforts to mitigate impacts through community programs. A Social Management Plan Monitoring Tool identifies specific vulnerable groups, indigenous representatives, ethnic groups and non-profit organizations and budgets for initiatives being implemented. Stakeholder presentations provided identifying human rights risks and mitigations being implemented.</p>
1.3.2.4.	<p>At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them and shall be consulted to provide feedback on those findings.</p>	●	<p>Evidence was provided of Stakeholder Day presentations, programmed agenda and minutes, demonstrating stakeholder participation in a review of findings and key issues. The Stakeholder Impact Assessment and Perception Report demonstrates stakeholder involvement in the human rights assessment process. A Stakeholder Perception Survey provides further evidence of stakeholder involvement. The Human Right Due Diligence Process Scope of Work for 2022 includes stakeholder involvement in process design. Management Committee minutes include feedback from stakeholders on impacts and mitigations.</p>
1.3.2.5.	<p>The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level.</p>	✔	<p>Human Rights Due Diligence Review provides evidence that human rights actions have been planned and implemented onsite through the operating company's continuous quality assurance process: Plan Do Check Adjust process. The Stakeholder Impact Assessment and Perception Report provide evidence on stakeholder attitudes.</p>
1.3.3.1.	<p>Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which</p>	✔	<p>There is evidence of a thorough grievance mechanism process, and the procedure and flow chart were provided. Evidence was provided of implemented Incident and Grievance training (Toolbox Talks), posting of procedures on noticeboards, and</p>

Requirement #	Requirement Text	Rating	Basis for rating
	they can raise concerns and seek recourse for grievances related to human rights.		inclusion of Incidents and Grievance as agenda items during Stakeholder Day presentations and contractor meetings. Example of local employee grievance was provided, with associated documentation demonstrating how the grievance was resolved and controls developed to avoid similar grievances in the future (creation of past employees list, for potential future contract opportunities). Evidence supports interviews with managers, employees, and contractors that human rights grievances can be lodged and addressed through a functional process.
1.3.3.2.	<p>Responding to human rights risks related to the mining project:</p> <ul style="list-style-type: none"> a. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s). b. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks. c. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities. 	✔	A corporate human rights policy demonstrates the objective of avoidance of human rights risks and impacts and mitigation. The Human Rights Due Diligence Report documents competent third-party review. The Social and Human Rights Impact and Risk Analysis supports this process. The Stakeholder Impact Assessment and Perception Report indicate stakeholder participation in the assessment process and development of mitigations. Stakeholder Perception Survey (2021) indicates stakeholder awareness of the grievance process. Evidence of discussion of Incidents and Grievances during Business Forum and Contractor meetings provided. Evidence provided of proposed mediated meeting between the operating company and the local business forum.
1.3.3.3.	<p>Critical Responding to actual human rights impacts related to the mining project:</p> <ul style="list-style-type: none"> 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; and 	●	The evidence provided by the Human Rights Due Diligence review is supported by the Social and Human Rights Impact and Risk Analysis review, the Social Performance Report in March 2021, the Socio-Economic Development Stakeholder Day presentation, and the letter to the local business forum, which references the use of a mediator to resolve an ongoing issue. Social Performance Report provides some examples of potential human rights impacts that the company may be contributing to (i.e., shortage of housing due to influx of job seekers and employment creation at the mine) and provides recommended mitigations. Report




Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> 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>provides details on stakeholder engagement activities and potential grievances. Stakeholder Impact Assessment and Perception Report indicate assessment and mitigations included stakeholder consultation. Stakeholder Perception Survey indicates awareness of the Incident and Grievance process. Evidence was provided of the proposed mediated meeting between the operating company and the local business forum. Scope of Work for Human Rights Due Diligence Process update (2022) includes consultation and collaboration with stakeholder groups. Stage 2 onsite interviews did not provide an opportunity to gather additional evidence to better understand cooperation with local municipality and other groups on programs to identify and address mitigate human rights impacts, including disaster management planning.</p>
1.3.4.1.	<p>The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.</p>	✔	<p>Evidence provided demonstrates a robust impact mitigation and control process. Mine-specific evidence of control monitoring to check effectiveness of mitigations provided through Workplace Risk Assessment and Controls update, Stakeholder Engagement Analysis, Vulnerability assessment. Stakeholder Impact Assessment and Perception Report indicate stakeholder participation in assessment and development of mitigations. Perception Survey and Stakeholder Day presentations indicate ongoing stakeholder participation in monitoring. Interviews with a community group representative indicated participation in human rights impact mitigation during consultations.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.3.4.2.	<p>External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:</p> <ul style="list-style-type: none"> a. The company shall fund the external monitoring; and b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. 	—	Documentation provided and interviews with managers, employees, community groups and local government representatives do not indicate a repeated failure of efforts to identify, mitigate or monitor human rights impacts.
1.3.5.1.	<p>The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts.</p>	☑	<p>Human Right Due Diligence review, Stakeholder Day presentations (April and October 2021), Socio-Economic Development and Business Forum presentations and operating company Sustainability Report demonstrate regular public reporting on human rights issues. Internal processes and meeting minutes indicate thorough review of identified issues and mitigations. Stakeholder Impact Assessment, Perception Report and Survey provide further evidence of public reporting. Interviews with managers, workers and community group representatives support the evidence provided.</p>
1.3.5.2.	<p>If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations.</p>	☑	<p>The operating company publishes an annual Sustainability Report that refers to support for human rights, building social capital and upholding high social standards. The report discusses the range of grievances received and actions taken to address incidents. The site employed a competent third party in the development of the Human Rights Due Diligence review and has developed a Scope of Work for an updated Human Rights Due Diligence Process to continue in 2022, which includes stakeholder participation. Stakeholder Day and socio-economic development presentations include discussion of human rights impacts and mitigations. A Business Forum agenda, the Stakeholder Impact Assessment and Perception Report, and the Stakeholder Perception Survey indicate regular reporting and discussion of human rights and mitigations. Interviews with community group representatives and Business Forum participants support the evidence provided.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.3.5.3.	Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization.	☑	An operating company group policy and Sustainability Report provided suggest that as a global public company that politically sensitive or business confidential information would be excluded from public reporting noting that as a guiding principle, "our policies guide us to do the right thing."
Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy			
1.4.1.1.	Critical 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>The site is guided by corporate level policies that require Anglo American mines to develop and implement an external grievance mechanism.</p> <p>The site has in place a Social Incidents and Grievance Standard Operating Procedure, implemented in 2019.</p> <p>The Grievances 2021 and Social Incidents & Grievances Management Log show that grievances are being received and responded to by the site.</p> <p>Grievances can be logged via "YourVoice" app, WhatsApp, email, telephone, and grievance boxes in rural communities. The grievance boxes are cleared once a week by independent service providers.</p> <p>During interviews, stakeholders reported that they are aware of the grievance mechanism and how to access it. Some stakeholders, however, noted that they do not receive a timely response from Kolomela when they submit complaints. Further review of the effectiveness of the grievance mechanism will be conducted during the Surveillance Audit, including actions to address feedback from stakeholders.</p>
1.4.2.1.	<p>The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:</p> <p>a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue;</p>	☑	<p>The site has in place a Social Incidents and Grievance Standard Operating Procedure that:</p> <p>a. Was updated in 2019 to aligned with the United Nations Guiding Principles on Business and Human Rights</p> <p>b. Sets out clear instruction and time frames for filing and grievance resolution</p> <p>c. Respects confidentiality</p> <p>d. Facilitates the anonymous reporting of grievances</p> <p>f. Provides options for appeal or recourse</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase; c. How confidentiality of a complainant's identity will be respected, if requested; d. The ability to file anonymous complaints, if deemed necessary by stakeholders; e. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups; f. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and g. How complaints and grievances and their resolutions will be tracked and recorded. 		Ongoing stakeholder engagement was used to update the grievance mechanism, and an example was shared that now the right to appeal is clearly explained.
1.4.2.2.	The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available.	✔	The evidence reviewed indicates that the grievance mechanism is broadly shared in the project area through a number of different channels, including via the Anglo American website, shared at annual stakeholder days, included in monthly newsletters, posted on community notice boards.
1.4.3.1.	No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.	⬇	<p>The grievance mechanism does not explicitly state that no remedies require stakeholders to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies. However, this is implied through the appeals process laid out in the standard operating procedure which facilitates third-party appeals.</p> <p>Evidence presented shows that complainers are informed of their right to appeal through judicial processes if they are not satisfied with the site's attempt to resolve a grievance.</p>
1.4.4.1.	Complaints and grievances and their outcomes and remedies shall be documented.	✔	The site is guided by corporate level policies that require Anglo American mines to document grievances and their outcomes. It was reported in interviews that incidents are captured on a grievance form and input into Isometrics (Kolomela's

Requirement #	Requirement Text	Rating	Basis for rating
			stakeholder management software).. Each incident is assigned a number and tracked then from start to finish.
1.4.4.2.	<p>The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine:</p> <ol style="list-style-type: none"> If changes need to be made to improve its effectiveness as per 1.4.2.1.a; If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and If outcomes and remedies provided through the mechanism accord with internationally recognized human rights. 	☑	<p>The standard operating procedure requires sites to report on the effectiveness of the standard operating procedure on a quarterly basis.</p> <p>The site undertook a gap analysis in September 2020 to evaluate grievance mechanism performance and identify gaps in the current standard operating procedure. The gap analysis presents a timebound action plan to address gaps and make improvements to the standard operating procedure.</p> <p>Through the year, grievances and suggestions, learnings from appeals are consolidated in Q3, and looked at performance against baseline and actions undertaken.</p>
1.4.4.3.	Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism.	⊕	<p>Evidence presented demonstrates that stakeholders have a number of different means (email, phone, WhatsApp, YourVoice App) through which to submit grievances, and that these are communicated to stakeholders through different forums, from posters to meetings. Community boxes are in place where people can place grievances.</p> <p>Feedback from Uluala, the community perceptions survey, etc. allow for stakeholders to give feedback and suggestions.</p> <p>Stakeholders interviewed, however, noted that they did not know how their feedback is used by the mine, and were broadly unaware that they could submit feedback on the grievance mechanism or how it functioned.</p>
1.4.5.1.	The operating company shall take reasonable steps to inform all stakeholders of the existence of the operational-level complaints and grievance mechanism, its scope, and its procedures.	☑	Evidence presented demonstrates that stakeholders are informed of the grievance mechanism through a number of different forums. Posters are shared through newspapers and community newsletters. On the community boxes, information is shared about what the boxes are for and encourage people to get in touch. Evidence also shows that the mine has taken measures to explain the grievance mechanism scope and what stakeholders can expect when using it.
1.4.5.2.	The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking	☑	The appeals process is laid out in the standard operating procedure which facilitates third-party appeals. Evidence presented shows that complainers are informed of

Requirement #	Requirement Text	Rating	Basis for rating
	redress through administrative, judicial or other non-judicial remedies.		their right to appeal through judicial processes if they are not satisfied with the site's attempt to resolve a grievance.
1.4.5.3.	The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances, and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous.		Evidence provided shows that the site has held several 'lessons learnt from incidents sessions.' Learning from Incidents (LFI) training was given to all those who deal with grievances. Task team members were identified as people who typically referred people from different disciplines. Training focused on received through investigation. Grievance procedure presentation H1.pptx shows that training of the grievance mechanism has been presented; however, it is not clear who has received this training. The incidents screened as level 1 and 2 are still taken through the LFI.
1.4.6.1.	Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances.		Evidence provided demonstrates that the site provides feedback on grievances internally through quarterly reports. Share feedback on the top three grievances and give feedback around the controls and invite stakeholders to comment on these, and link back to the Workplace Risk Assessment and Control. During interviews it was reported that feedback is first provided to stakeholders involved in the grievance. Feedback on grievances in general is shared during the annual Stakeholder Day, including the nature of grievances, how many were opened and closed, and groupings of stakeholders that had raised grievances.
Chapter 1.5—Revenue and Payments Transparency			
1.5.1.1.	The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime.		Since 1 January 2015, Anglo American has been subject to the project-by-project reporting requirements of the UK Reports on Payments to Government Regulations (SI 2014/3209) and Chapter 10 of the EU Accounting Directive (2013/34/EU). These rules require that the group prepares and submits to Companies House, the UK registrar of companies, a full analysis of tax and certain other payments made to governments in respect of extractive projects on a project-by-project basis. However, this information is still not available. There are limitations in the scope of the Payments to Governments Regulations (e.g., it focuses solely on the group's extractive activities, excludes consumption and certain other taxes, and is limited in application to jointly owned entities, etc.). In order to provide a better explanation of the Group's economic contribution, Anglo American has voluntarily extended these

Requirement #	Requirement Text	Rating	Basis for rating
			<p>principles in the Tax and Economic Contribution report.</p> <p>In the 2019 Report, it was reported that other voluntary initiatives have been adopted by Anglo American including: the publication of country-by-country data; the implementation of GRI 207: Tax 2019 reporting requirements; compliance with the voluntary Tax Transparency Code in Australia; endorsing the Responsible Tax Principles established by The B Team; and supporting the Extractive Industries Transparency Initiative, both directly and as part of the International Council on Mining and Metals. An independent assurance statement by Deloitte LLP to Anglo American plc (“Anglo American”) on the Payments to Governments submission and Other taxes borne is included within the Tax and Economic Contribution Reports 2017-2019. There was no site-specific information within the report or provided elsewhere.</p>
1.5.1.2.	On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year.	—	It is not relevant because the corporate company is subject to EU Directives.
1.5.1.3.	<p>The types of payment disclosed shall include as a minimum, as applicable:</p> <ul style="list-style-type: none"> a. The host government’s production entitlement; b. National state-owned enterprise production entitlement; c. Profits taxes; d. Royalties; e. Dividends; f. Bonuses, such as signature, discovery and production bonuses; g. License fees, rental fees, entry fees and other considerations for licenses and/or concessions; h. Payments for infrastructure improvements; and 	—	It is not relevant because the corporate company is subject to EU Directives.

Requirement #	Requirement Text	Rating	Basis for rating
	i. Any other significant payments and material benefits to government, including in kind payments.		
1.5.1.4.	At minimum, this information shall be broken down by recipient government body (where applicable), by project (where applicable), and by payment type.	⊗	Besides the corporate tax and economic contribution report, no specific data other than tax receipts were available during the time of the assessment. The information is not published by operation but is consolidated for South Africa operations.
1.5.2.1.	The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below.	—	Compliance to the European Union Directive 2013/34/EU is not a requirement for Kolomela Mine.
1.5.2.2.	<p>The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:</p> <ul style="list-style-type: none"> a. Mine production, disaggregated by product type and volume; b. Revenues from sales, disaggregated by product type; c. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department); d. Social expenditures, including the names and functions of beneficiaries; e. Taxes, tariffs or other relevant payments related to transportation of minerals; f. Payments to politicians' campaigns, political parties or related organizations; and g. Fines or other similar penalties that have been issued in relation to the project. 	⊗	The Kumba Iron Ore Annual report is a combined report for both Kolomela and Sishen and is part of the overall Anglo American annual report Project level information was not available during the audit.

Requirement #	Requirement Text	Rating	Basis for rating
1.5.2.3.	The operating company shall publish annual accounts, following international accounting standards.		Kumba Iron Ore publishes annual accounts as part of the Anglo America Annual report. The Anglo American annual report complies with International accounting standards; however it should be noted that Kumba Iron Ore is reported as one entity and project level information is not available.
1.5.3.1.	If the mining project is located in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website.		Information provided by the site included a public statement endorsing the Extraction Industries Transparency Initiative principles.
1.5.3.2.	If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall: <ul style="list-style-type: none"> a. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and b. Provide links on its external website to completed and up-to-date Company Forms for its operation, if the EITI implementing country has completed at least one validation. 		Information provided by the site included a public statement endorsing the Extraction Industries Transparency Initiative principles and is available on the internet. However, there is limited evidence of involvement with country-level Extraction Industries Transparency Initiative activities.
1.5.4.1.	The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in the national language(s) of the country in which the mining project is located. <ul style="list-style-type: none"> a. Where these terms are negotiated, rather than governed by law, the company shall make the relevant agreements, licenses or contracts freely and publicly accessible. b. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement. 		There is only an acceptance of application for mining right (18 January 2011). No further documentation regarding the final mining rights grant was available. Environmental Impact Assessment Environmental Impact Assessment report including an environmental management program and mitigation measures. Closure is available. However, no evidence that this document and other agreements and contracts (concession agreements, licensing agreements, production sharing agreements, service agreements, mining rights and proof of consultations) are publicly accessible in the national language(s) of the country of operation.

Requirement #	Requirement Text	Rating	Basis for rating
1.5.4.2.	The beneficial ownership of the operating company shall be publicly accessible.	☑	The beneficial ownership of Kumba Iron Ore is reported in the Kumba Iron Ore section which is a part the Anglo American Annual report. Kumba Iron Ore does not report independently.
1.5.5.1.	Critical The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.	☑	<p>The operating company has developed, documented, and implemented policies and procedures following corporate policies to prohibit bribery and corruption, not only for site employees but for contractors and other 3rd parties working for or with the company. The policy that applies for all Anglo American operations, provides the basis for the respective Business Integrity Corruption Prevention Procedures.</p> <p>An Anti-bribery/anti-corruption policy was reported to be in place; this policy is verbally communicated to employees and contractors through onboarding training. The policy is posted publicly via the Anglo American website and can be found to be mentioned in 35 separate public documents. Further evidence was provided in the application of the process where the mine has the capability to capture and review comments or complaints raised by stakeholders relating to fraud, bribery, and corruption. These were seen to be progressed as part of the documented process with outcomes recorded from the investigation and actions. Anglo American has a contract with Anglo American Business Assurance Services, who are responsible for investigating allegations of fraud and corruption.</p>
1.5.5.2.	<p>Procedures shall include:</p> <p>a. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and</p> <p>b. Disciplinary actions to be taken if cases of bribery or corruption are discovered.</p>	☑	<p>Evidence that a procedure to manage potential fraud and corruption cases was provided and reviewed.</p> <p>The procedure explaining the Kumba Iron Ore's position with respect to any and all types of fraud and corruption was reviewed. The procedure, strictly forbidding any type of government payments or other equivalent activities that may give the impression of benefitting government employees. Site interviews confirmed that this expectation is being met.</p> <p>Disciplinary action in the event of failure to follow this expectation is not defined in the documents provided.</p>
1.5.5.3.	Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.	⊕	Evidence was provided showing that the organization has implemented anti-corruption/anti-bribery training for employees. However, there is insufficient evidence to demonstrate that all relevant personnel have received the training. Evidence of training records for contractors only shows Safety, Health, Environmental and Quality policies but not anti-corruption/anti-bribery policy.

Principle 2: Planning for Positive Legacies


RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Note on Chapter 2.1:

In October 2020, the IRMA Board approved changes in the way Chapter 2.1 were to be audited for existing mines. Existing mines are only required to meet a core set of requirements related to assessment of environmental and social risks (called CORE requirements), although existing mines have the option to be audited against the new mine requirements. Kolomela has opted to do so, and that is reflected in the Basis for rating column. Existing mines are still required to have in place an environmental and social management system.

Requirement #	Requirement Text	Rating	Basis for rating
Chapter 2.1—Environmental and Social Impact Assessment and Management			
2.1.1.1	An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project.		Since the inception of the Kolomela mine in 2011, the mine appointed third-party consultants to conduct environmental and social impact studies, as per the legislated requirements.

Requirement #	Requirement Text	Rating	Basis for rating
2.1.1.2.	To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken.	☑	In the documents reviewed, it was confirmed that the Environmental and Social Impact Assessment process was conducted after the project design for the mine was completed.
2.1.1.3.	The ESIA shall be carried out in accordance with publicly available, documented procedures.	☑	The Environmental and Social Impact Assessment processes follow a publicly available process requiring public participation and disclosure of information. Information not supplied at the public participation meetings is made available on request.
2.1.2.1.	Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project.	☑	Examples of posters, notices and advertisements that are placed around the town, in public buildings and newspapers were reviewed. These were all to inform the local communities of the intended expansion at the mine.
2.1.2.2.	<p>Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:</p> <ul style="list-style-type: none"> a. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities; b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts; c. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and 	☒	Evidence of the site having a process in place to comply with this requirement was not presented during this assessment.

Requirement #	Requirement Text	Rating	Basis for rating
	d. Contact details for the person or team responsible for management of the ESIA.		
2.1.3.1.	<p>Critical (New Mines) The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.</p> <p>Critical (Existing Mines) The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental and social impacts associated with the mining operation.</p>	☑	The scoping report was reviewed and found to be compliant with the requirement.
2.1.3.2.	During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as “stakeholders”) who may be interested in and/or affected by the proposed project.	☑	A document that identifies all stakeholders (neighbors, affected and interested parties, authorities, and municipalities) was submitted for review.
2.1.3.3.	<p>Scoping shall include the consideration of:</p> <ul style="list-style-type: none"> a. Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure; b. Direct, indirect and cumulative impacts; and c. Potential impacts of extreme events. 	☑	The latest scoping report, dated 2021, was reviewed and found to be compliant with the IRMA requirements.
2.1.3.4.	<p>Scoping shall result in the identification of:</p> <ul style="list-style-type: none"> a. Potentially significant environmental and social impacts of the proposed project; b. Alternative project designs to avoid significant adverse impacts; c. Other actions to mitigate identified adverse impacts; and 	☑	The latest scoping report, dated 2021, was reviewed and found to be compliant with the IRMA requirements.


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	d. Additional information and data needed to understand and assess the potential impacts.		
2.1.4.1.	Baseline data describing the prevailing environmental, social, economic and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project.	☑	Kolomela mine submitted a 'new' combined Environmental and Social Impact Assessment in February 2022 that clearly documents the baseline data at the time of submission.
2.1.4.2.	Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA.	☑	In Part C of the Environmental and Social Impact Assessment report dated February 2022, 11 completed specialist studies are attached.
2.1.5.1	The operating company shall: <ul style="list-style-type: none"> a. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping; b. Determine the significance of the predicted impacts; c. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the avoidance of impacts through consideration of alternative project designs; and d. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders. 	☑	The 2021 Scoping report was reviewed and found to comply with all four of the requirements.
2.1.6.1.	The operating company shall prepare an ESIA report that includes, at minimum: <ul style="list-style-type: none"> a. A description of the proposed mining project; b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts; c. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the 	☑	The mine submitted an Environmental Impact assessment (EIA) dated 2021 and a Social and Human Impact and Risk analysis (SHIRA) dated 2020 , Both documents were reviewed and found to comply with all five of the set out sub-requirements.



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	<p>mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts;</p> <p>d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and</p> <p>e. Names and affiliations of ESIA authors and others involved in technical studies.</p>		
2.1.7.1.	The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine.	☑	The mine is certified against ISO 14001 and 45001 standards. These systems make provision for the identification and management of environmental and safety risks. Social risks are addressed and managed according to the Anglo American Social Way program.
2.1.7.2	<p>An environmental and social management plan (or its equivalent) shall be developed that, at minimum:</p> <p>a. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process;</p> <p>b. Assigns personnel responsible for implementation of various elements of the plan; and</p> <p>c. Includes estimates for the resources needed to implement the plan.</p>	⊕	The Environmental and Social Impact Assessment, dated February 2022, contains an environmental and social plan. Roles of responsibility are not assigned, and resources have not been allocated.
2.1.7.3.	The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information.	⊗	The mine reported that conditions have changed, and new information has become available. However, no evidence was provided to show updates and changes made with the original ESIA.
2.1.8.1.	<p>As part of the ESMS, the operating company shall establish a program to monitor:</p> <p>a. The significant environmental and social impacts identified during or after the ESIA process; and</p> <p>b. The effectiveness of mitigation measures implemented to address environmental and social impacts.</p>	⊕	<p>Documents were submitted that show the mine has developed monitoring programs identifying environmental and social impacts.</p> <p>No evidence was submitted to show the effectiveness of mitigation measures implemented to address environmental and social impacts.</p>





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2.1.8.2.	The monitoring program shall be designed and carried out by competent professionals.	☑	Documentation, for both in-house and external persons, was supplied to show the credentials that would qualify them as competent.
2.1.8.3.	If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project.	☑	The site reported that there have not been any requests from stakeholders for independent monitoring.
2.1.9.1.	<p>(New Mines) As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:</p> <ul style="list-style-type: none"> a. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3); b. Methodologies for the collection of environmental and social baseline data (see 2.1.4); c. The findings of environmental and social studies relevant to the conclusions and recommendations of the ESIA (see 2.1.5.1.a and b); d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c); e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and f. The final conclusions and recommendations of the ESIA (see 2.1.6.1). <p>(Existing Mines) The operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine</p>	☑	Section 8 of the submitted Environmental and Social Impact Assessment report dated February 2022 was reviewed and found to be in compliance with the IRMA requirements. During the Quarterly Environmental stakeholder feedback forums Environmental data is reported and questions and suggestions are documented.,
2.1.9.2.	(New Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the	☒	Stakeholder forums are held. However, it is not clear that the stakeholders are invited to contribute to the development of mitigation strategies for new or existing projects.

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	development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process. (Existing Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the development of options to mitigate the potential impacts of the mine.		
2.1.9.3.	The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and social monitoring program.	⊗	The minutes of the stakeholder engagements do not reflect consultation regarding the scope and design of monitoring programs.
2.1.9.4.	The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program.	⊗	No evidence was submitted that showed that the site has a plan in place to encourage stakeholder participation in environmental and social monitoring.
2.1.9.5.	The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments.	⊙	Section 8 of the report sets out the complete public participation process, comments, and responses from Kolomela to stakeholders.
2.1.10.1.	(New Mines) The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner. (Existing Mines) At minimum, a summary of the significant environmental and social impacts and risks associated with the mining operation shall be made public	⊙	A public participation process is undertaken as part of the NEMA Environmental Impact Assessment (EIA) regulations (GNR. 326 of 2017) and the Regulations Regarding the Procedural Requirements for Water Use Licence Applications and Appeals (GNR 267 of 2017) promulgated under the National Water Act, 1998 (Act No.36 of 1998). The findings of the EIA (which include an analysis of environmental and social impacts) were shared publicly through stakeholder meetings and stakeholders were given 30 days to comment on the Draft EIA, in November 2021. The report was available at electronically.

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2.1.10.2.	The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account.		In the 2022 Environmental and Social Impact Assessment for Kolomela, the stakeholder's name, comment and response is included in the report. No supporting evidence was available to confirm the accessibility of public records of anonymized stakeholder comments and the site's responses.
2.1.10.3.	The environmental and social management plan shall be made available to stakeholders upon request.		Whilst interviewing the Environmental Advisor, who is the person in charge of the quarterly feedback meetings with stakeholders, it was confirmed that the final Environmental and Social Impact Assessment report is uploaded to the Forums site and is available on request.
2.1.10.4.	Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available.		Social: A number of documents and reports are publicly available on social impacts and performance. Environmental: quarterly reports discussed at the Environmental Stakeholder forum.
2.1.10.5.	(New Mines) The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means. (Existing Mines) The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means.		The Anglo American social management system, Social Way 3.0, is publicly available on the Anglo American website. Environmental, health, safety and sustainability programs and key performance data are published in the Integrated Report, Sustainability Report and Climate Change Report on the Anglo American Kumba Iron Ore website. Specific environmental, health and safety management system information is made available to the public upon evaluation of request.
Chapter 2.2—Free, Prior and Informed Consent (FPIC)			
	Chapter Not Relevant	—	Kolomela has identified two groups of indigenous peoples within the broader mine area of influence (See Requirement 1.2.1.4. for a definition of an area of influence), between 35km and 80km from the Mine, the Groenwater Community and the Griquaka People. A comprehensive Indigenous Peoples Scoping study was complete in 2020 to establish a baseline understanding of the indigenous communities and assess impacts to the communities. The study included consultation with traditional leaders, local government and

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			<p>baseline surveys with Griqua communities of Griekwastad and Campbell and consultation. The study concluded that the Mine does not impact on the legal or customary rights, or interests of the Groenwater Community or the Griquaka People.</p> <p>This Chapter has been determined to be 'Not Relevant' to the Kolomela Mine. At present, based on the existing definition of the area of influence and FPIC, there are no indigenous peoples whose legal or customary rights or interests may be affected by the company's mining activities, or potential mine expansions.</p> <p>Kolomela has continued to engage with Indigenous Peoples as a vulnerable group and consider them in socio-economic development activities. An Indigenous Peoples Management Plan has been prepared to guide engagement with Indigenous Peoples.</p> <p>Further interviews with traditional leaders and leaders of the Groenwater Community and the Griquaka Peoples will be conducted at the next surveillance audit.</p>
Chapter 2.3—Obtaining Community Support and Delivering Benefits			
2.3.1.1.	<p>The operating company shall publicly commit to:</p> <ul style="list-style-type: none"> a. Maintaining or improving the health, social and economic wellbeing of affected communities; and b. Developing a mining project only if it gains and maintains broad community support. 		<p>The site follows the Anglo American Social Way 3.0 Policy which sets out Anglo American's commitment to avoid harm and create an environment in which communities impacted by Anglo American operations can prosper sustainably. The Anglo American Social Way 3.0 Policy and Toolkits are publicly available on Anglo's website.</p> <p>Programs and commitments to health/socio-economic wellbeing of affected communities included in the Social and Labor Plan - a publicly disclosed document.</p> <p>Neither the site nor Anglo American state explicitly that they will only develop a mine if they maintain broad community support.</p>
2.3.2.1.	<p>For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained.</p>	—	<p>Kolomela is an existing mine.</p>

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2.3.2.2.	<p>For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support:</p> <ul style="list-style-type: none"> a. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project; b. Was transparent; c. Was free from coercion or manipulation; and d. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution. 	—	Kolomela is an existing mine.
2.3.2.3.	For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.		<p>The mine conducted a community perception survey in 2019 that shows generally positive sentiment towards the mine. The site has a memorandum of understanding in place with the local municipality, where the mine is located.</p> <p>Stakeholders reported that while they are largely supportive of the mine, there is some dissatisfaction around the delivery of benefits and procurement opportunities. Although protests and grievances are raised regularly, these are not always aimed only at Kolomela, but also at surrounding mines and the general state of dissatisfaction due to external factors. The mine is actively working in and with communities to maintain support for its operations.</p>
2.3.3.1.	The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company's contributions to community development initiatives and benefits in affected communities.		Corporate guidance notes that participatory engagement is a key part of socio-economic development projects. Social and Labor Plan planning process requires stakeholder engagement and the involvement of the local municipality. It was reported that stakeholder input is gathered through events like the Stakeholder Day, and it was reported that stakeholder's input around projects is sought in the planning process. Stakeholders are given opportunities to submit projects during engagements. Stakeholders are asked to give input into priorities and benefit delivery. The socio-economic development is prepared in consultation with the local municipality, as per regulatory

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			requirements. Many stakeholders noted that they do not feel they had an opportunity to participate in the planning of the socio-economic development plan, or they did not understand how their input was taken into consideration.
2.3.3.2.	The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency.		Evidence demonstrates that stakeholder input is obtained through existing platforms such as Stakeholder Days, and through community engagement that considers access for vulnerable groups. Deliberately tried to bring in stakeholders from the vulnerable groups to solicit inputs, including disabled groups in the planning and the implementation. Many stakeholders noted that they do not feel they had an opportunity to participate in the planning of the socio-economic development plan, or they did not understand how their input was taken into consideration.
2.3.3.3.	If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process.		No such requests were made. Mine representatives noted that if such a request were made the site would facilitate this.
2.3.3.4.	Efforts shall be made to develop: <ul style="list-style-type: none"> a. Local procurement opportunities; b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). 		The site has an inclusive procurement policy that looks at opportunities for the host community and the broader region. Evidence shows the mine has looked at opportunities for procurement in and beyond the host community and has included more communities. Seeking to support diverse businesses and building capacity so that people can tap into these. Evidence presented shows the mine has made efforts to improve local procurement and employment. Socio-economic development and Social and Labor Plan projects consider stakeholder input to target a broad range of stakeholders, and stakeholder engagement projects must be aligned with long-term mine objectives, including closure objectives.
2.3.3.5.	The planning process and any outcomes or decisions shall be documented and made publicly available.		Evidence shows that the Social and Labor Plan is available to the public via Anglo's intranet, and the link is shared with stakeholders. It is also printed and

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			shared. Socio-economic development feedback is also given through the annual Stakeholder Day.
2.3.3.6.	In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements.	✔	<p>The site has a monitoring and evaluation framework that is used to evaluate each project. The projects are tracked on a quarterly basis and stakeholders are afforded the chance to provide feedback on the projects. See socio-economic development monitoring and evaluation 2020.</p> <p>Stakeholder inputs are considered and analyzed, and management input is sought. Feedback is provided to stakeholders through Anglo's change management process.</p>
Chapter 2.4—Resettlement			
	Chapter Not Relevant	—	Not relevant because no resettlement has occurred in association with this mine.
Chapter 2.5—Emergency Preparedness and Response			
2.5.1.1.	Critical All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in <i>United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)</i> for Mining.	✘	The site was unable to provide evidence that they have specifically reviewed the guidelines of the UN APELL for Mining. However, corporate and site level documentation does adequately address the guidelines and recommendations.
2.5.1.2.	<p>The operating company shall:</p> <ol style="list-style-type: none"> Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and Update the communications contacts of the emergency response plan at least annually. 	✔	Kolomela Mine established a drill schedule for 2021 that included several drills to be completed each month. Records, including debriefing minutes and photos of drills both on and off the mine site, show evidence of the completion of the drills. A similar drill schedule has been established for 2022.

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2.5.2.1.	Critical The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.	✓	The Drafting / Review Committee includes at least two full-time health & safety representatives. Evidence was also reviewed of external presentations and discussions of the Emergency Preparedness and Response Plan with community members and contractors.
2.5.3.1.	All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events.	✓	Kolomela Mine has in place a Comprehensive General Liability policy through Holdac Insurance Ltd and Reinsurers. The policy is in effect for 12 months from the 1 st of July 2021, both days included are at GMT London time and 12:01am local standard time at the address of the insured. The policy is renewed annually.
2.5.3.2.	The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others.	✓	The Summary of Exclusions under the mine's Comprehensive General Liability coverage includes an exclusion for "occurrences arising out of discharge or contaminant or pollutants unless sudden, unintended and unexpected."
2.5.3.3.	The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property.	✓	Insurance policies reviewed are current and in good standing; however, these policies expire after 12 months. This requirement will have to be reviewed at each audit to ensure concurrent coverage has been maintained.
Chapter 2.6—Planning and Financing Reclamation and Closure			
2.6.1.1.	The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company.	●	<p>Kolomela does not conduct any exploration outside of the mining concession. All operations are conducted within the current permitted mine area.</p> <p>Should the mine decide to conduct exploration outside of the current mine area the site reports that a reclamation plan will be developed and will include the IRMA requirements.</p> <p>While no evidence was identified that former exploration activities have yet to be reclaimed, further review of former exploration activities that may not have yet been reclaimed will be reviewed during the surveillance assessment.</p>



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2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.	✓	The mine has developed a Mine Closure Plan that was reviewed by the audit team. No evidence was identified that former exploration activities have yet to be reclaimed.
2.6.1.3.	Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4).	✓	The mine has a Stakeholder engagement process in place as well as a grievance mechanism for stakeholders to communicate and lodge complaints. No evidence of complaints regarding incomplete or inadequate exploration reclamation was identified during the audit. Stakeholders are encouraged to use the mine's grievance mechanism if they believe the mine has not adequately completed reclamation of past exploration activities.
2.6.2.1	Critical Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.	✓	The closure planning and costing has been prepared in line with the requirements as set out in the Financial Provisioning Regulations, GN R.1147. These include: (a) Annual Rehabilitation Plan (b) Final Rehabilitation, Decommissioning and Mine Closure Plan (c) Environmental Risk Assessment to identify and quantify the latent risks (d) Proposed Post Mining Land (PML) Use for Kolomela Mine is included in the Mine Closure Plan.
2.6.2.2	At a minimum, the reclamation and closure plan shall contain: a. A general statement of purpose; b. Site location and background Information; c. A description of the entire facility, including individual site features; d. The role of the community in reviewing the reclamation and closure plan; e. Agreed-upon (after-ESIA) post-mining land use and facility use; f. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure;	✓	Kolomela Mine has adopted the Anglo American Mine Closure Toolbox approach and its requirements for closure planning. The Toolbox is underpinned by the Anglo American 'Code of Conduct,' the International Council on Mining and Metals' principles and commitments, as well as the Good Practice Guidance for Integrated Mine Closure, and the Anglo American Safety Health and Environment Policy and Guidelines. The Toolbox also aligns with the Anglo American Social Way, as it is the vehicle for social transition during the operational phase (Anglo American Mine Closure Toolbox v3, 2019). Furthermore, the closure planning and costing aligns with the requirements as set out in Financial Provisioning Regulations, 2015. The Kolomela Mine Closure Plan, dated December 2020, was reviewed, and found to be compliant with the IRMA requirements as set out in the IRMA standard.

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	<ul style="list-style-type: none"> g. Source mitigation program to prevent the degradation of water resources; h. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization; i. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable; j. Earthwork: <ul style="list-style-type: none"> i. Stabilization and final topography of the reclaimed mine lands; ii. Storm water runoff/run-on management; iii. Topsoil salvage to the maximum extent practicable; iv. Topsoil storage in a manner that preserves its capability to support plant regeneration; k. Revegetation/Ecological Restoration: <ul style="list-style-type: none"> i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use; ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time; iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed; iv. Measures for control of noxious weeds; v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6); l. Hazardous materials disposal; m. Facility demolition and disposal, if not used for other purposes; n. Long-term maintenance; o. Post-closure monitoring plan; 		

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	<p>p. The role of the community in long-term monitoring and maintenance (if any); and</p> <p>q. A schedule for all activities indicated in the plan.</p>		
2.6.2.3.	<p>The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum:</p> <ul style="list-style-type: none"> a. Mobilization/demobilization; b. Engineering redesign, procurement, and construction management; c. Earthwork; d. Revegetation/Ecological Restoration; e. Disposal of hazardous materials; f. Facility demolition and disposal; g. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including: <ul style="list-style-type: none"> i. Interim process water and site management; and ii. Short-term water treatment; h. Post-closure costs for: <ul style="list-style-type: none"> i. Long-term water treatment; and ii. Long-term monitoring and maintenance; i. Indirect Costs: <ul style="list-style-type: none"> i. Mobilization/demobilization; ii. Engineering redesign, procurement and construction management; iii. Contractor overhead and profit; 	✓	<p>The Kolomela Closure Liability Update, dated November 2021 and Closure Liability Estimate, dated June 2021, includes a breakdown of cost estimates for decommissioning and restoration of the following closure components: offices, contractors and support, plant, other onsite infrastructure, open cast pits, mine residue deposits, stockpiles and borrow pits, water related infrastructure, overland and general, offsite infrastructure, monitoring and specialist studies, maintenance, offset programs (biodiversity), and social. Each closure component costing includes a detailed breakdown of the costs set out in the IRMA standard.</p>

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	<ul style="list-style-type: none"> iv. Agency administration; v. Contingency; and j. Either: <ul style="list-style-type: none"> i. A multi-year inflation increase in the financial surety; or ii. An annual review and update of the financial surety. 		
2.6.2.4.	<p>The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report.</p>	☑	<p>The mine's closure plan is updated every 3 years, and the closure cost liability is updated annually and independently reviewed by PwC Consulting annually.</p> <p>The mine updates the closure liabilities estimate annually, as required by legislation. The assessments are based on environmental management programs and other commitments in various authorizations, as well as design closure criteria for final closure of the operations. Financial provisions are made annually and are reviewed and audited in line with internal and external requirements. Financial provisions are provided once the Department of Mineral Resources approvals of liability estimates are received.</p> <p>The mine is yet to receive any requests for an interim reclamation progress report from its stakeholders.</p>
2.6.2.5.	<p>If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:</p> <ul style="list-style-type: none"> a. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and b. Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety. 	☑	<p>The mine confirmed that communities were afforded an opportunity to comment on the mine closure plan during the Environmental Impact Assessment process, and also during the public participation phase.</p> <p>In accordance with Section 41(2)(b) of Chapter 6 of the Environmental Impact Assessment Regulations (GN. 982 of 4 December 2014, as amended), written notification was provided to all persons on the Interested & Affected Parties database. This includes:</p> <ul style="list-style-type: none"> a. Eight site notices (Afrikaans and English) were placed at the access roads and main gate to the site, as well as at public areas (Super Spar and Pick 'n Pay) in Postmasburg. b. Email notifications were sent to the identified interested and affected parties. c. SMS text notifications were sent to the identified interested and affected parties.


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			<p>d. Advertisements were placed in two newspapers (local and regional), one in English and one in Afrikaans, which were distributed in the Postmasburg area (Noordkaap Bulletin and the Kathu Gazette).</p> <p>A project schedule for the Kolomela Environmental Management Program amendment process was made available. The Environmental Management Program includes mine closure objectives.</p>
2.6.2.6.	<p>Critical The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request.</p>	☑	<p>The Mine Closure Plan is filed with the Department of Mineral Resources and the report is available to the community upon request. Community engagement meetings have taken place to discuss closure objectives with community members. It has been reported that community complaints relate to dust, water running low and vibration.</p> <p>Furthermore, the mine confirmed that communities have been afforded an opportunity to comment on the reclamation plan during the Environmental Impact Assessment process and during the public participation phase.</p>
2.6.3.1.	<p>Open pits shall be partially or completely backfilled if:</p> <ul style="list-style-type: none"> a. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and b. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and c. It is economically viable. 	☑	<p>Kolomela Mine is actively busy with in-pit backfilling where possible and discusses this in their 2018 Life of Mine plan. The open pits can only be partially rehabilitated or backfilled because mining is continuing in most of the areas for the remainder of the Life of Mine.</p> <p>Backfilling has commenced in some areas and is planned to take place in other areas.</p> <p>Supporting evidence was provided in the form of a weekly rehabilitation report dated 18 October 2021. Herein, an update on rehabilitation progress is provided. The report notes that there has been good progress on backfilling, and the mine is "well ahead of the planned tons into the pit."</p> <p>The Mine Closure Plan states that Kolomela will reinstate the grazing potential on the mining areas (including the backfilled pits) but will control the grazing utilization to protect the rehabilitated areas that will remain more sensitive and be more prone to erosion (e.g., steeper slopes) than the surrounding natural or other grazing areas.</p>
2.6.3.2.	<p>Underground mines shall be backfilled if:</p> <ul style="list-style-type: none"> a. Subsidence is predicted on lands not owned by the mining company; and 	—	<p>Kolomela Mine does not have any underground operations.</p>


Requirement #	Requirement Text	Rating	Basis for rating
	b. If the mining method allows.		
2.6.4.1.	Critical Financial surety instruments shall be in place for mine closure and post-closure.		<p>The mine's closure plan is updated every 3 years. The closure cost liability is updated annually and is independently reviewed by PwC annually. The closure costing has been signed off and approved by financial management, and financial guarantees are in place and have been submitted to the authorities.</p> <p>In a letter to the Regional Manager of the Department of Mineral Resources and Energy, Kumba Iron Ore Limited reported the latest estimated closure cost, the amount in a trust fund, bank guarantees and the shortfall against the estimated closure cost. The letter goes on to state that Sishen Iron Ore Company (PTY) Ltd, the holder of a mining right under which it operates Kolomela Mine, is in the process of addressing the identified shortfall by securing a bank guarantee. No additional information was provided to the audit team to confirm the mine's securing of the additional bank guarantee in order to satisfy the shortfall. This requirement will be reviewed during the surveillance assessment, including the status of the shortfall.</p>
2.6.4.2.	<p>Financial surety instruments shall be:</p> <ul style="list-style-type: none"> a. Independently guaranteed, reliable, and readily liquid; b. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan; c. In place before ground disturbance begins; and d. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. 		<p>The mine updates the closure liabilities estimate annually, as required by legislation. The assessments are based on environmental management programs and other commitments in various authorizations, as well as design closure criteria for final closure of the operations. Financial provisions are made annually and are reviewed and audited in line with internal and external requirements. Financial provisions are provided once the Department of Mineral Resources approvals of liability estimates are received.</p> <p>The Mine Closure Plan is updated by an independent party and is reviewed by third-party auditors. The mine has appointed PwC Consulting to perform an independent review of the financial provision for mine closure and rehabilitation, which includes an assessment of their financial surety instruments. The provision is reviewed against the requirements set out under IAS 37 Provisions, Contingent Liabilities and Contingent Assets.</p> <p>A site visit was performed by PwC consultants on the 25th of November 2021, and will hereafter perform an assessment on the financial provision against the mine closure plan and closure objectives, including regulatory requirements. The objective of the review is to confirm if there is sufficient financial surety for long-term and post-closure activities. Based on the FY21 year-end provision, Kolomela currently has a shortfall of R327,115,073 in their funding for their closure provision.</p>

Requirement #	Requirement Text	Rating	Basis for rating
2.6.4.3.	Self-bonding or corporate guarantees shall not be used.	✓	Self-bonding or corporate guarantees are not used.
2.6.4.4.	The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request.	✓	<p>The PwC Sustainability and Climate Change team performed an IAS37 environmental legal and constructive obligation review for Kumba's operations on behalf of the financial audit team. The audit report from PwC is not publicly disclosed on Anglo American's website.</p> <p>Kolomela's Communication Participation and Consultation procedure covers access to information from stakeholders.</p> <p>It has been reported that no requests have been made to the mine yet. Therefore, at present there is no evidence of records of stakeholder requests for copies of approved financial surety reviews, and the mine's response to such requests. Should it be requested, the mine will provide financial surety information to its stakeholders.</p>
2.6.4.5.	<p>Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:</p> <ol style="list-style-type: none"> Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential reasons, the fact that the information has been withheld shall be disclosed along with the financial surety. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested stakeholders with the 	✗	<p>Kolomela mine has developed and implemented a stakeholder engagement program, and several communications channels are in place. Community engagement meetings have taken place to discuss closure objectives with community members. It has been reported that community complaints relate to dust, low groundwater levels and vibration.</p> <p>While social and environmental risks, including associated closure costs, are identified in the Mine Closure Plan and have been shared with stakeholders as noted under Section 2.6.2.5, there is no evidence that the public has had the opportunity to comment on the adequacy of the financial surety (financial guarantees), apart from the fact that the Closure Liability report is included as an Annexure to the mine closure plan report.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	opportunity to propose independent experts to review the financial surety.		
2.6.4.6.	<p>The terms of the financial surety shall guarantee that the surety is not released until:</p> <ul style="list-style-type: none"> a. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and b. Public comment has been taken before partial or final surety release. 	⊖	<p>In a letter from Investec (the Guarantor) dated 4 May 2021, it states that a Guaranteed Sum of financial provision may be held or utilized by Anglo on the condition that the mine, after having complied with all the provisions of the final rehabilitation, decommissioning and mine closure plan or environment risk assessment report, will, within 1 year from the date of the payment by Investec, give account to Investec of how the Guaranteed Sum was utilized. Investec will be paid any portion of the Guaranteed Sum that was not so utilized.</p> <p>Similarly, a letter from Rand Merchant Bank, dated the 18th of May 2021, confirms surety for mine closure and reclamation, which shall only be released when a set number of conditions have been met (as above).</p> <p>While social and environmental risks, including associated closure costs, are identified by the Mine Closure Plan and have been shared with stakeholders as noted under Section 2.6.2.5, there is no evidence to confirm that public comment has been taken before partial or final surety release.</p>
2.6.5.1.	<p>Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all mine facilities, including, but not limited to:</p> <ul style="list-style-type: none"> a. Inspection of surface (open pits) and underground mine workings; b. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and c. Mechanisms for contingency and response planning and implementation. 	⊕	<p>The closure liability includes the cost for post-closure monitoring of pit stability.</p> <p>The closure plan encompasses monitoring in all phases: pre, closing and post-closing; inspection of surface (open pits); and Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and mechanisms for contingency and response planning and implementation.</p> <p>The Kolomela mine closure and rehabilitation plan are guided by statutory requirements (legislation of the Republic of South Africa), internal corporate requirements regarding mine closure (including the Anglo American Mine Closure Group Technical Standard and associated Mine Closure Toolbox), and good practice (good practice experience of Redco and Uvuna specialists).</p> <p>There is no underground mining at Kolomela.</p>
2.6.5.2.	Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all	⊕	Geochemical modelling results correlate with the groundwater monitoring data and leachate results, indicating that leaching of potential contaminants in the medium to long term is unlikely. Nevertheless, post-closure monitoring

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	closed mine facilities, as well as at the points of compliance.		<p>includes surface and groundwater monitoring points, respecting quality limits. Monitoring is planned to be carried out during the life of the project.</p> <p>Kolomela mine has an extensive water quality monitoring system that covers the following areas:</p> <ul style="list-style-type: none"> a. Drinking water points b. Groundwater <ul style="list-style-type: none"> - Dewatering boreholes - Pollution source monitoring (boreholes closer to potential pollution sources) - Hydro census boreholes (boreholes out in the surrounding farms) c. Surface water monitoring points <ul style="list-style-type: none"> - Process water points - Sewage points - Storm water collection and discharge points
2.6.5.3.	Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively.	⊖	The Mine closure plan includes post-closure monitoring of both surface and groundwater, The plan makes provisions for post closure monitoring for a period of 25 years. However, the plan does not comply with the IRMA water quality standard.
2.6.5.4.	Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources.	⊕	<p>Biodiversity (including terrestrial and aquatic) general monitoring criteria, frequency and scope are defined in the mine closure plan.</p> <p>It has been reported that environmental monitoring and maintenance will continue for at least 20 years after closure, or until an acceptable post-closure steady state has been obtained. Biodiversity and pit stability monitoring will be costed for 20 years, because of the expected long time to reach the success criteria. Surface water, groundwater and air quality will be monitored for 10 years because it is expected that success will have been achieved within that period.</p>

Requirement #	Requirement Text	Rating	Basis for rating
2.6.5.5.	If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds, or agricultural uses, adequate measures shall be taken to protect these organisms.		<p>The Kolomela Mine Closure Plan 2020 report notes that detailed studies must be completed, and plans must be in place to address long-term impacts on surface and underground water resources (e.g., pit water quality, future decant, interconnectivity of groundwater between pits/underground workings, health impacts on people). The Mine Closure Plan refers to long-term monitoring and modelling of pits. Furthermore, the estimated pit lake level at Kolomela Mine has been modelled but is based on no further dewatering at closure. The agreement with Sedibeng will require continuing dewatering, and the pit lake will not form as modelled.</p> <p>The rehabilitation of the backfilled and partially backfilled open pits will be commensurate with the rehabilitation of waste rock dump slopes. The following monitoring aspects were included in the closure liability estimate:</p> <ul style="list-style-type: none"> a. Pit stability to monitor the long-term stability of the remaining high walls. b. Updated pit lake study before closure to confirm the closure scenario. c. Biodiversity and rehabilitation success criteria to prove that a Net Positive Impact on biodiversity and the planned land use is achieved; the monitoring of alien invasive vegetation is included.
2.6.6.1.	<p>Long-term water treatment shall not take place unless:</p> <ul style="list-style-type: none"> a. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and b. The operating company funds an engineering and risk assessment that: <ul style="list-style-type: none"> i. Is carried out by an independent third-party; ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods; iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms; iv. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and 	—	<p>The waste streams at the mine do not produce leachable concentrations of contaminants that are considered to pose a risk to the environment. Therefore, there is a negligible risk of acid mine drainage originating from waste streams. As such, there is no need to treat the water, only a need to monitor.</p>


Requirement #	Requirement Text	Rating	Basis for rating
	v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion.		
2.6.6.2	If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated.	—	No post-closure water treatment activities have been identified as necessary. However, a need to monitor acid drainage has been identified by the mine.
2.6.7.1.	The operating company shall provide sufficient financial surety for all long-term activities, including: mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company's finances at the time of mine closure or bankruptcy.		<p>The financial surety instruments are in place to cover the costs related to mine closure. These cost calculations and financial guarantees are reviewed annually by third-party auditors.</p> <p>A site visit was performed by PwC on 25 November 2021, and will hereafter perform an assessment on the financial provision against the mine closure plan and closure objectives, including regulatory requirements. The objective of the review is to confirm if there is sufficient financial surety for long-term and post-closure activities. Based on the FY21 year-end provision, Kolomela currently has a shortfall of R327,115,073 in their funding for their closure provisions.</p> <p>The waste streams at the mine do not produce leachable concentrations of contaminants that are considered to pose a risk to the environment. Therefore, there is a negligible risk of acid mine drainage originating from waste streams. As such, there is no need to treat the water, only a need to monitor.</p>
2.6.7.2.	<p>If long-term water treatment is required post-closure:</p> <p>a. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and</p> <p>b. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded.</p>	—	<p>The waste streams at the mine do not produce leachable concentrations of contaminants that are considered to pose a risk to the environment. Therefore, there is a negligible risk of acid mine drainage originating from waste streams. As such, there is no need to treat the water, only a need to monitor.</p>




Requirement #	Requirement Text	Rating	Basis for rating
2.6.7.3.	The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety.	✔	<p>The mine closure plan is updated by an independent party and reviewed by independent consultants. The mine has appointed PwC to perform an independent review on the financial provision for the mine closure and reclamation. The provision is reviewed against the requirements set out under IAS 37 Provisions, Contingent Liabilities and Contingent Assets.</p> <p>The PwC Sustainability and Climate Change team performed an IAS37 environmental legal and constructive obligation review for Kumba's operations on behalf of the financial audit team. PwC performed a site visit on the 25th of November 2021, and on the 18th of January 2022 submitted their feedback.</p> <p>Based on the FY21 year-end provision, Kolomela currently has a shortfall of R327,115,073 in their funding for the environmental provision.</p>
2.6.7.4.	<p>Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:</p> <p>a. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and</p> <p>b. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US \$10.00 or less (or its equivalent in other currencies).</p>	✘	<p>The PwC Sustainability and Climate Change team performed an Impact Assessment (IAS)37 environmental legal and constructive obligation review for Kumba's operations on behalf of the financial audit team.</p> <p>In the financial surety calculations, a discount rate of 9.43% was applied.</p> <p>There is no evidence that the operating company has financial surety and that the audit record includes the Real Interest Rate and Net Present Value calculations.</p>

Principle 3: Social Responsibility

RATING LEGEND
Description of performance

✔	Fully meets
◐	Substantially meets
◑	Partially meets




	Does not meet
—	Not relevant





Requirement #	Requirement Text	Rating	Basis for rating
Chapter 3.1—Fair Labor and Terms of Work			
3.1.1.1.	The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law.		HR policies and procedures, Wage Agreement, pay-slip examples, union recognition agreement and minutes of meetings with unions provided. Grievance mechanism and disciplinary code provided. Interviews with employees confirm implementation of human resources policies and communication to workers through induction and ongoing communications and Offer Letter.
3.1.2.1.	Critical The operating company shall respect the rights of workers to freedom of association and collective bargaining.		Code of Conduct, Recognition Agreements, Contingency Operations Division Agreement, Shop Steward Procedural Agreement, Induction Training screenshot, Grievance Procedure and dispute form provided. Interviews with managers and employees confirm respect by the operating company for the rights of workers to collectively bargain. Interviews with contracted workers indicate that suppliers may strongly discourage the exercise of workers' right to freedom of association.
3.1.2.2.	Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms.	—	South Africa does not restrict workers' organizations from developing alternative means to express their grievances. Recognition agreements cited in 3.1.2.1 indicate there is a dispute resolution procedure in place for the site.
3.1.2.3.	The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner.		The minutes of meetings with union representatives provided include discussion of future restructuring plans and indicate on-going discussions and the sharing of information by the operating company in a timely matter to support negotiations. The Wage Agreement provided speaks to future consultations. Interviews with contracted workers did not indicate what information is shared with their employers.

Requirement #	Requirement Text	Rating	Basis for rating
3.1.2.4.	Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers' representatives at fly-in/fly-out or other remotely located mine sites, where relevant.	✓	The Recognition Agreements provide for adequate facilities for workers' representatives. Interviews with managers and workers onsite confirming union facilities are provided. Rental of venues for union meetings is also facilitated. The site is not a fly-in / fly-out or remote location, and therefore this requirement is not relevant.
3.1.2.5.	The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike.	●	The Recognition Agreements and Grievance Mechanism provided explain agreed upon union organization process. Interviews with managers and employees of the operating company indicate neutrality in any legitimate unionizing or worker organizing effort. Interviews with contracted workers indicate that their employers may strongly discourage efforts to organize workers.
3.1.2.6.	Upon employment, the operating company shall: <ul style="list-style-type: none"> a. Inform workers of their rights under national labor and employment law; b. Inform workers that they are free to join a workers' organization of their choosing without any negative consequences or retaliation from the operating company; c. If relevant, inform workers of their rights under any applicable collective agreement; and d. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative. 	✓	Interviews with managers and workers confirm that Human Resource Department representatives and union representatives provide employees with information on their rights and the process and benefits of joining one of the existing unions at the site. The Shop Steward Elections Schedule confirms the existence of a union at the site.
3.1.2.7.	The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike.	✓	Recognition Agreements, posting of national legislation images and Grievance Procedure provided confirm the operating company's recognition of unions and respect for members' rights. The evidence provided is supported by interviews with managers and employees.

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3.1.2.8.	Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements.	✓	Interviews with managers and workers indicate that the operating company respects the terms of collective bargaining agreements. Contingency Operations Division Agreements and Wage Agreement indicate implementation of the terms of the Recognition Agreements. Grievance procedure and dispute form example detail the process for resolving disputes with union representation.
3.1.2.9.	The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations.	●	Recruitment and Selection Policy, Wage Agreement, examples of Letters of Offer and Grievance Procedure provided. Interviews with managers and workers indicate that short-term contracts are not used to undermine collective bargaining agreements. Union representatives are notified if short-term contracts are required in special circumstances. However, interviews with contracted workers also indicate that their employers strongly discourage interest in union organization.
3.1.2.10.	The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike.	—	There has not been a legal strike or lockout at the site. Recruitment and Selection Policy, Wage Agreement, examples of Letters of Offer and Grievance Procedure provided. Interviews with managers indicate that replacement workers have not been used to undermining a legal strike or negotiation in good faith.
3.1.3.1.	The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements.	✓	Evidence provided (creation Employment Equity Consultative Forum as per legislative requirement; Code of Conduct; HR Principles and Policies; Kolomela Employment Equity Plan) indicates active compliance with the principles of equal opportunity and treatment. Induction training, grievance procedure and dispute form were also provided.
3.1.3.2	Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of: <ul style="list-style-type: none"> a. Targets or quotas mandated by law; b. Targets developed through local agreements for the employment of local residents, indigenous peoples, 	✓	Interviews with managers and workers and evidence provided indicate strong and active efforts to comply with legislative requirements with respect to employment equity. Affirmative action and definition of disabled people is covered by worker training. The site also has an active local learners' program to provide opportunities for skills development by residents that may lead to employment at the site or other employers in the area.

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	<p>or individuals who have been historically disadvantaged; or</p> <p>c. Operating company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets.</p>		
3.1.3.3.	<p>Critical The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.</p>	●	<p>Evidence provided demonstrates policies and implementation of robust training to prevent and address harassment, intimidation and/or exploitation, especially with regards to women. Grievance mechanism and form for registering a dispute provided. Interviews with workers and mine management confirm awareness of how harassment complaints can be lodged and the process for addressing them. However, interviews with workers also suggest more measures and attention are needed to ensure employees and contractors are comfortable using multiple grievance platforms available. Interviews with several workers and work groups raised the potential for safety concerns or other grievances not being brought forward due to relational or communication weaknesses within their respective work environments.</p> <p>In the second half of 2022 the site rolled out Gender Based Violence workshops for all levels of the organization. All shift employees and straight shift employees were covered.</p> <p>In second half of 2022 the Woman in Mining committee was re-instated/established. A campaign was launched to create awareness of the functions of the committee. The committee provides also voice for women that might not feel comfortable to speak out in the normal forums.</p> <p>An awareness campaign is currently running on site television screens at the entrance to the mine. The campaign is intended to make people aware of the Your Voice platform where you can raise sensitive cases, including Victimization/harassment. Your Voice is currently addressed in ' Digging Deeper', the mine's newspaper.</p> <p>On the 26th of January 2023 a presentation on psychological safety was made to management, this included the updated Bully, Harassment and Victimization policy and launch of a 'Living with the Dignity Hub'. Plant shift employees have now been exposed to the same presentation. Contract workers have not yet been addressed.</p> <p>A digital platform called 'Engage app', which was developed for Covid, is installed on all employees and contractors' cellphones. The App includes the Psychological</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>Safety Header where all the policies and how to report, on any safety, harassment etc. matter, is available.</p> <p>The site's next step will be to recommunicate to all contractors the Bullying, Harassment, and Victimization Policy and Psychological Safety, a campaign will then be launched, and a competition will be run. This is all aimed at encouraging all employees to take part in 'Getting to know more about Kolomela's stance of speaking up for everyone. (Bully, Harassment and Victimization and Living with Dignity Hub process)".</p> <p>As contractors had not yet been covered during the visit to the mine in April 2023, it was deemed not necessary to conduct interviews with contractors at that time.</p>
3.1.4.1.	<p>Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination, and be implemented to reduce the adverse impacts of retrenchment on workers.</p>		<p>Interviews with managers and workers indicate that 2021 restructuring reductions were discussed with unions and workers. Voluntary severance packages were the primary vehicle used to achieve reductions. Minimal reductions occurred during the most recent 2021 Section 189 "efficiency -re-modeling process - smart work exercise." However, sufficient evidence was not provided to determine the effect of retrenchment on contracted workers. Interviews with contracted workers also did not provide adequate detail to understand how the contracted workforce was treated during the most recent 2021 restructuring.</p>
3.1.4.2.	<p>The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments.</p>		<p>Interviews with managers and employees indicate a policy and process in accordance with national laws and collective agreements that informs workers of termination and severance payments, which are paid directly. Interviews with contracted workers did not adequately explain a similar and consistent process implemented by their employers.</p>
3.1.5.1.	<p>Critical The operating company shall provide a grievance mechanism for workers (and their</p>		<p>Interviews with employees and management indicate there are functioning grievance mechanisms in place, which includes an appropriate level of</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <ul style="list-style-type: none"> a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution; b. Shall allow for anonymous complaints to be raised and addressed; c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements. 		<p>management to address concerns promptly, transparency and timely feedback, anonymity, and allowance for worker representatives. Grievance and disciplinary procedures do not impede other judicial or administrative remedies. However, interviews also indicate that contracted workers are less likely to lodge a grievance due to perceived inaction by management and/or their employer.</p>
3.1.5.2.	<p>The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.</p>		<p>Interviews with managers and workers indicate that employees and contractors are informed of the Grievance Mechanism by human resources and/or union representatives. The Grievance Procedure is easily accessible through multiple platforms, including the operating company's intranet and a phone-based app.</p>
3.1.5.3.	<p>The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues.</p>		<p>The operating company maintains an intranet-available record of grievances, reporting publicly on grievances through annual reports.</p>
3.1.6.1.	<p>The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers.</p>		<p>The disciplinary code and procedure are a thorough process, communicated to workers through related Toolbox Talk. The disciplinary code is made available to workers through a company intranet. Interviews with managers and workers confirm that the process is understood and functional.</p>
3.1.6.2.	<p>The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal</p>		<p>The disciplinary code is thorough and follows national legislation. Abolition of Corporal Punishment Act prohibits use of corporal punishment. Anti-bullying, Harassment and Victimization is compulsory training for all employees and contractors. Sexual harassment policy provided. Toolbox Talk on Sexual Harassment</p>

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	abuse, coercion or intimidation of workers during disciplinary actions.		references prohibition of all forms of sexual harassment and the use of grievance or disciplinary procedure as a formal way of dealing with cases. Interviews with managers and workers confirm disciplinary action does not include corporal punishment or any harsh or degrading treatment.
3.1.6.3.	The operating company shall keep records of all disciplinary actions taken.	☑	The intranet system provides a record of disciplinary actions. Misconduct Finalized Cases - Status Report provided. Review of records indicates that most cases are concluded at a Reduced to Documentation (RCD) level.
3.1.7.1.	The operating company shall document the ages of all workers.	☑	Employee list documenting age provided. Age verification records and onboarding route list provided, supported earlier by recruitment policy. Interviews with managers, employees and contractors confirm the age verification process prior to the employment Letter of Offer. Contractors must verify the age of all contracted employees and comply with national and operating company contract term requirements.
3.1.7.2.	Critical Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances).	☑	Code of Conduct is explicit in its commitment not to use child labor. Employee list provided. Age verification record indicates child labor has not been hired. Interviews with managers, employees and contractors confirm the age verification process.
3.1.7.3.	Critical The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher.	☑	Age verification records indicate that the company has not hired a worker under the age of 19. Interviews with managers, employees and contractors confirm a functional age verification process.
3.1.7.4.	When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself.	—	From the evidence provided and interviews with managers and workers, there is no evidence that child labor is used.
3.1.7.5.	If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:	—	From the evidence provided and interviews with managers and workers, there is no evidence that child labor is used.

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	<p>a. The child shall be removed immediately from his or her job; and</p> <p>b. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family.</p>		
3.1.7.6.	<p>Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.</p>	—	<p>Through interviews with managers and workers, there is no evidence to indicate there is a high risk of child labor being used in the operating company's supply chain. The operating company has a functional and implemented system in place to exclude the use of child labor. Regular contractor meetings provide a means to monitor contract terms compliance.</p>
3.1.8.1.	<p>Critical The operating company shall not employ forced labor or participate in the trafficking of persons.</p>	☑	<p>The Code of Conduct is explicit in its prohibition of forced labor. The South African Constitution prohibits slavery, servitude and forced labor. From evidence provided and interviews with managers and workers, there is no evidence of forced labor being used by the operating company or its supply chain. Contract template references adherence to Voluntary Principles and human rights. Regular contractor meetings provide an opportunity to monitor and evaluate compliance against key performance indicators (KPIs).</p>
3.1.8.2.	<p>Where there is a high risk of forced or trafficked labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers</p>	—	<p>From interviews with managers and workers, there is no evidence that there is a high risk of forced labor being used.</p>

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	that can demonstrate that they are complying with this chapter.		
3.1.9.1.	The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage.	✓	Evidence indicates full compliance with this requirement. Interviews with managers and workers confirm this finding. Pay slips and overtime pay slips are provided. Wage Agreements indicate an annual adjustment in wages based on position and collective agreement requirements.
3.1.9.2.	Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage.	✓	A collective agreement exists. A Wage Agreement is provided. Overtime Payment Policy provided indicating overtime is either based on a collective agreement rate for unionized employees or is not paid for other exempt workers.
3.1.9.3.	All workers shall be provided with written and understandable information about wages (overtime rates, benefits, deductions and bonuses) before they enter employment, and for the pay period each time they are paid.	✓	The evidence provided indicates that human resource policies require payment of wages in accordance with market conditions and collective agreements. Interviews with workers indicate that staff can request a more detailed pay slip from the Human Resources Department, as required.
3.1.9.4.	The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check).	✓	Interviews with managers and workers indicate that all employees and contractors are paid by bank transfer.
3.1.9.5.	The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist: <ul style="list-style-type: none"> a. Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or b. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award. 	✓	Disciplinary Code and Procedure and Suspension with full pay examples are provided. Interviews with managers indicate that deductions from wages for disciplinary purposes follow code and procedures, national requirements, and collective agreements.

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3.1.10.1.	<p>The operating company shall ensure that:</p> <ul style="list-style-type: none"> a. Regular working hours do not exceed eight hours per day, or 48 per week. Where workers are employed in shifts the 8-hour day and 48-hour week may be exceeded, provided that the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week; b. Workers are provided with at least 24 consecutive hours off in every 7-day period; and c. Overtime is consensual, and limited to 12 hours a week. d. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if: <ul style="list-style-type: none"> i. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and ii. Through consultations with workers' representatives, a risk management process that includes a risk assessment for extended working hours is established to minimize the impact of longer working hours on the health, safety and welfare of workers. 	✔	CONTOPS (Inconvenience Top-ups) Agreement provided. Interviews with managers and workers indicate that compressed work week shifts allow for required time off, and overtime requests are consensual.
3.1.10.2.	<p>Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:</p> <ul style="list-style-type: none"> a. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and b. A maternity leave period of no less than 14 weeks. 	◐	Leave policies for employees provided. Interviews with managers and workers indicate implementation of policy for employees. South Africa Labor Guide indicates a leave accrual process. Interviews with contracted workers did not adequately address compliance with national law, highlighting discrepancies between leave provided to employees versus contracted workers.



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Chapter 3.2—Occupational Health and Safety			
3.2.1.1.	The operating company shall implement a health and safety management system for measuring and improving the mining project's health and safety performance.	✔	The site completed a certification audit to ISO 45001:2018 on July 1 st , 2021. The site was recommended for certification pending receipt of corrective actions for identified nonconformities. Management review meeting documentation and supporting evidence demonstrate the continued improvement of the management system.
3.2.2.1.	The operating company shall implement an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations.	✔	The site has developed an Operational Risk Management Program (ORMP) and register of the Risk and Critical Control Register maintained and reviewed. The Operational Risk Management Program (ORMP) outlines a hierarchical structure of risk identification and evaluation. These include the baseline risk assessment, task-specific risk assessments, Bow-tie risk assessments, Job Risk Assessments for high hazard tasks and pre-work risk assessments or SLAM (Stop Look Assess Manage).
3.2.2.2.	<p>The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:</p> <ul style="list-style-type: none"> a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and machinery, and waste and chemical management; b. All personnel, contractors, business partners, suppliers and visitors; c. Unwanted events; d. Routine and non-routine activities, products, procedures, and services; and e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services. 	✔	The Scope of Kolomela Operational Risk Management Program Procedure addresses all the standard requirements, including: routine and non-routing conditions; incidents and potential emergencies; post, current and planned opportunities; influence of human behavior, capabilities and other human factors; hazards originating externally, which impact work-related activities or people under the control of the mine; and modification to the Safety, Health, and Environmental Quality Management system, including temporary change and their impacts on operations, processes and activities.

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3.2.2.3.	The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to particular hazards.	⊕	The site has identified a limited number of risks related to vulnerable workers within its Baseline Workplace Risk Assessment and Controls. Onsite interviews with personnel, including occupational hygiene professionals, identified an extensive process for evaluating job functions and tasks of workers, including further evaluation for those especially susceptible to hazards. However, the information provided was not extensive in the scope of vulnerable workers and there is limited evidence to show that the site has extensively assessed hazards identified with particular attention to vulnerable workers.
3.2.2.4.	The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards.	⊕	The site does not necessarily maintain one specific risk management plan. Instead, the Operational Risk Management Procedure outlines the processes for identifying and evaluating baseline risk, issue-based risk, bow-tie risk assessments, specific job risk analysis and in-the-moment conditions-based risk assessment (Stop Look Assess Manage). Each of these steps includes the identification of priority unwanted events (PUE) and the controls necessary to prevent the occurrence of PUEs and impact to workers. On-site interviews and observations confirmed the understanding implementation of these processes. However, the SLAM (stop, look, assess, manage) process is not being implemented as fully intended in some instances. Specifically, the SLAMs observed for blasting identified standard generic risks and not those specific to the conditions in the moment.
3.2.2.5.	<p>In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:</p> <ul style="list-style-type: none"> a. Ensure that the mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment; b. Ensure that the mine is commissioned, operated, maintained and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons; c. Maintain the stability of the ground in areas to which persons have access in the context of their work; d. If relevant, whenever practicable provide two exits from every underground workplace, each 	⊖	Corporate standards exist requiring operational controls implementation to provide conditions for safe operation and a healthy working environment, including sub-requirements (a) through (h), except for those related to underground mining (not relevant). Onsite interviews and observations included review of equipment, conditions, and controls in place to protect workers. Areas of concern were identified specifically related to the workshop (e.g., uneven work surfaces, lifting heavy objects and ventilation) and contractor fatigue center (adequate seating and tables, access to potable water, lighting, and toilet facilities).

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	<p>connected to separate means of egress to the surface;</p> <p>e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted;</p> <p>f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards;</p> <p>g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and</p> <p>h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location.</p>		
3.2.3.1.	<p>Workers shall be informed of their rights to:</p> <p>a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority;</p> <p>b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority;</p> <p>c. Know and be informed of workplace hazards that may affect their safety or health;</p> <p>d. Obtain information relevant to their safety or health, held by the employer or the competent authority;</p> <p>e. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and</p> <p>f. Collectively select safety and health representatives.</p>	⊕	<p>The site's agreement with the unions includes provisions for establishing safety committees with worker representatives. It also includes the right to leave an unsafe workplace, and the obligation for the mine to inform employees of health and safety information. Toolbox Talk records were provided to show the format and content of health and safety information shared with workers. The records include worker signatures for confirmation of attendance. Onsite employee and contractor interviews indicate that there may be hesitancy among workers to request Section 23 (Mine Health and Safety Act - the right to refuse dangerous work and leave dangerous working places). Mine management may order workers to leave a dangerous working place under Section 54. Review of 2021 Section 23 and Section 54 data shows that more stops work orders are issued by management than are being requested and recorded by workers.</p>
3.2.3.2.	<p>In all cases a worker attempting to exercise any of the rights referred to in 3.2.3.1 in good faith shall be protected from reprisals of any sort.</p>	⊕	<p>Kolomela Mine has established the YourVoice, an independent whistleblowing service supporting workers to do the right thing without fear of any negative consequences. The Procedure for Social Incidents and Grievances outlines how such issues should be managed, including provisions for vulnerable groups and</p>

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			protection from reprisal. Onsite interviews with employees, contractors and employee representatives indicate a hesitancy to exercise Section 23 - the right to refuse dangerous work and leave dangerous working places.
3.2.3.3.	The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety.	✔	The operating company has developed a procedure for communication, participation, and consultation. The scope of the procedure is to ensure Safety, Health, and Environment information is communicated to and from employees and other interested parties at the mine. In addition, the procedure also seeks to involve, inform, and consult employees and interested parties on arrangements regarding documented Safety, Health and Environmental issues. Level 2 and level 3 Safety, Health, and Environment meeting (monthly) minutes were provided for review, and show details of issues being presented and discussed, along with an action register with assigned responsibilities and due dates.
3.2.3.4.	<p>The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:</p> <ul style="list-style-type: none"> a. Health and safety hazard identification and assessment; b. Design and implementation of workplace monitoring and worker health surveillance programs; c. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. 	✔	The site's process for hazard identification and risk analysis involves the participation of employee (Safety, Health, and Environment) representatives, who are selected by the workers as per the union agreements. Monthly Level 2 Safety, Health, and Environment meeting minutes show participation from site management and Safety, Health, and Environment representatives in the discussion of health and safety issues and the development of action plans in response to issues identified. Onsite interviews with occupational hygiene professionals and Safety, Health, and Environment representatives confirmed the participation of workers, both directly and through the Safety, Health, and Environment representatives, in matters relating to occupational health and safety.
3.2.3.5.	The operating company shall provide workers' health and safety representatives with the opportunity to:	✔	Monthly Mine Health and Safety Committee meetings take place involving employer, employee and Safety, Health, and Environmental department representatives. Section 11.5 investigations reviewed include sign-off by the Full-

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace; b. Monitor and investigate safety and health matters; c. Have recourse to advisers and independent experts; and d. Receive timely notice of accidents and dangerous occurrences. 		Time Health & Safety Representative, along with the Chief Safety Officer, Manager Engineering, Manager Mining, and General Manager.
3.2.3.6.	Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering.	✔	Visitors and third parties entering the mine are provided with induction and relevant personal protective equipment (PPE) for the areas that they will be accessing. The passport 360 system is used to onboard all visitors and third parties.
3.2.4.1.	<p>Critical (a and b) The operating company shall implement measures to protect the safety and health of workers including:</p> <ul style="list-style-type: none"> 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; 	●	<p>The site's Operational Risk Management Program (ORMP) establishes how workers are to be informed of the hazards, health risks and preventative and protective measures associated with their work. However, the site tour identified that job risk assessments were not made available to workers in all instances. Subsequent documentation reviewed showed that the site during the months of January, February and March 2023 issued 48 and 34 Job Risk Assessments (JRA's) for High-Risk Work (HRW) and 46 and 32 Work Execution Documents (WED's). In March 33 Job Risk Assessments (JRA's) for High-Risk Work (HRW) and 33 Work Execution Documents (WED's). The site had no corresponding information for the months of July - December 2022.</p> <p>The site has established a detailed personal protective equipment (PPE) specification, procedure and standard and auditors confirmed through discussions with works and contractors that PPE is provided and maintained at no cost to workers. However, respirator fit testing is currently not a part of this program, and no subsequent documentation was submitted to prove that specific training is being conducted on the fitment of respirators. It is important to note that this is not a requirement under South Africa law, but it is a requirement in other countries and generally regarded as a preferred health and safety practice.</p> <p>While onsite, tours were conducted of the Emergency Response and Occupational Health & Safety facilities available to all employees, and contracted services for advanced patient transport were confirmed. Health and safety training programs were sampled and reviewed. Adequate supervision of workers was generally</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>e. Providing adequate supervision and control on each shift; and</p> <p>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</p>		<p>observed. However, required supervision was found not to be in place during a particular instance of hazardous work, observed during the site tour. At the time of the follow-up audit no evidence could be found that an investigation was conducted and that any corrective actions were taken.</p> <p>During the Stage 2 follow-up assessment, Additional evidence was reviewed by the audit team. The evidence provided shows that the mine has a process in place for managing High Risk Work and has communicated the requirements for managing High Risk Work to its workers. On 23 March 2022 an internal Section 54 (Mine Health and Safety Act), form #11400 was issued, identifying, and confirming the issues observed by the audit team. Following this, an investigation and recommunication of the JRA to relevant employees was given and the Section 54 was uplifted on 25 March 2022. Corrective actions identified included the Section Manager to ensure that all high-risk work are supervised and that existing JRA for the isolation and lockout is re-communicated to employees. Actions were assigned and tracked in the organization's corrective action tracking system. Additional preventative actions were identified and included review of the high-risk work procedure, recommunication of high-risk work procedure to all employees and the digitization of WEDs and job cards to prevent tasks being executed without WEDs.</p>
3.2.4.2.	<p>If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers.</p>		<p>A procedure to identify and manage vulnerable groups has been recently implemented (March 2021). However, the procedure is specifically developed to cover COVID-19 vulnerable groups. In addition, a procedure to establish, implement and maintain arrangements to minimize risks to pregnant and breastfeeding women is in place. Fitness for work - Code of Practice document includes a detailed explanation of vulnerable groups and work limitations and controls to minimize their risks. Onsite interviews with occupational hygiene professionals confirmed the process for evaluating fitness for work.</p>
3.2.4.3.	<p>The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers.</p>		<p>Evidence provided, the recent audit report of the ARDMS toilets, indicates several deviations from the site's standards for meeting this requirement. Onsite tours and interviews identified deviations from these standards, in particular at the contractor fatigue center.</p>




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3.2.4.4.	<p>The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows:</p> <ul style="list-style-type: none"> a. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement: <ul style="list-style-type: none"> i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period; ii. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary they would otherwise normally receive if healthy and working); or iii. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker's employment at the mining project. b. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and c. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation that is equal to or greater than three months' salary of the deceased worker. 	✓	<p>The mine's worker compensation program was reviewed, which includes a tracking system for work-related injuries. Work-related injuries and illnesses were reviewed, and letters were sampled from Remote Mining Assistance (RMA) to injured employees provide proof of compensation to workers that incurred illnesses or injuries as a result of employment at the mine. Evidence reviewed showed that the mine is compensating workers for work-related injuries and illnesses as per the requirements of the IRMA Standard.</p>

Requirement #	Requirement Text	Rating	Basis for rating
3.2.5.1.	The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures.	✓	Monthly Mine Health and Safety Committee meetings take place involving employer, employee and Safety, Health, and Environment department representatives. Meetings include presentation and discussion of the Consolidated Report of Full-Time Health and Safety Representative - Summary of Significant and High-Risk Hazards Identified.
3.2.5.2.	<p>The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:</p> <ul style="list-style-type: none"> a. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals; b. Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests; c. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory; d. Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and e. If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits. 	✓	Evidence was reviewed of airborne pollutant monitoring, fitness for work and initial medical assessment programs affecting mine workers. Onsite interviews with occupational hygiene staff verified conformance with this requirement, including: a) Industrial health (IH) monitoring program in addition to airborne; b) Medical Surveillance program; c) IH and occupational health (OH) professional credentials; d) monitoring reports and trend analysis; e) procedure and records of communication of monitoring results to employees; and f) other evidence to verify implementation of the Fitness for Work Code of Practices.
3.2.5.3.	Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as	✓	Sampled documentation, including Code of Practices, all contained revision logs documenting periodic review and edits, along with the reason for the changes. Reasons include annual review, alignment to new guidelines, etc.

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	necessary based on inspection and monitoring results.		
3.2.5.4.	The operating company shall ensure that all workplace injuries, fatalities, accidents and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, investigated and that appropriate remedial action is taken.	☑	The site has developed and implemented an incidents management procedure and incidents record and tracking system. Evidence of required documentation and forms submitted to the Department of Mineral Resources were reviewed.
3.2.6.1.	The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities and dangerous occurrences collected by the company and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, shall be available to workers' health and safety representatives.	☑	Codes of Practices reviewed contain provisions for confidentiality and records retention. Onsite interviews and reviews of records and records retention practices and controls confirmed the effective implementation of the codes of practice.
3.2.6.2.	The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the health data management system.	☑	Tour of the Occupational Health Center and interviews with staff identified that worker health records are being stored in compliance with the requirements of this standard.
3.2.6.3.	The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations.	☑	Union agreement includes privacy protection for medical records. The site must also receive authorization from workers to access their health information. Health information is shared with workers during their consultations with OHC (Occupational Health Center) staff. No evidence of information being withheld from workers was uncovered during worker interviews during the onsite assessment.

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Chapter 3.3—Community Health and Safety			
3.3.1.1.	<p>Critical The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> 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. 	✔	Corporate policies and guidance require the site to understand potential impacts on the community and manage Community Health and Safety. In October 2021, the site retained Quality Research to complete the Kumba Iron Ore Kolomela Mine scoping report. The study's objectives included understanding the potential community health and safety impact areas of concern within the area of influence (See Requirement 1.2.1.4. for a definition of an area of influence) that may be directly or indirectly associated with Kolomela mine activities. Impact to groundwater and the impact of dust on the surrounding community were included in the report. The mine also conducted a rating review of the tailing's storage facility under the new GISTM (Global Industry Standard on Tailings Management) guidelines, which included identifying potential impacts of a TSF (Tailings Storage Facility) failure to the surrounding communities.
3.3.1.2.	Scoping shall include an examination of risks and impacts that may occur throughout the mine	●	The site's Baseline Workplace Risk Assessment and Controls includes community risks and impacts from various mining processes and activities, including all stages of the mine's lifecycle. The site has completed a Community Health and Safety

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	lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure).		scoping study and assessment of community health and safety risks and impacts which was out for public comment during the time of this assessment.
3.3.1.3.	Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities.	✔	Corporate policies and guidance require the site to understand potential impacts on the community and manage community health and safety. The Baseline Workplace Risk Assessment Controls includes evaluation of the risks and impacts on vulnerable communities, including neighboring farmers and farmworkers, indigenous peoples, contractor employees, 'voiceless' community members, informal housing inhabitants, etc. The site has also completed a communities vulnerability assessment (systemic) that evaluates several vulnerability factors across 12 communities.
3.3.2.1.	<p>The operating company shall carry out an assessment of risks and impacts to:</p> <ul style="list-style-type: none"> a. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping; b. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable. 	✔	In addition to the site's Baseline Risk Assessment and community health and safety scoping exercise completed in 2021, the site has also completed an evaluation of identified catastrophic risks. This analysis and information presented to stakeholders includes a detailed understanding of the risks, existing controls, treatment actions and action status of improvements to controls.
3.3.3.1.	<p>The operating company shall document and implement a community health and safety risk management plan that includes:</p> <ul style="list-style-type: none"> a. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and b. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective. 	✔	Corporate policies and guidance require the site to understand potential impacts on the community and manage community health and safety. The sites Social Management Plan 2021-2025 incorporates a Plan, Do, Check, Act model for establishing short- and long-term objectives achieved through projects and initiatives to mitigate identified risks, along with a process for monitoring the performance of the mine against those objectives.
3.3.3.2.	Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation.	⊕	Review of the site's Baseline Workplace Risk Assessment and the controls established for identified risks to community health and safety indicate that the site is not necessarily choosing avoidance over minimization and compensation as the primary form of mitigation.

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3.3.3.3.	The community health and safety risk management plan shall be updated, as necessary, based on the results of risk and impact monitoring.		The site has established a 5-year Social Management Plan that is required to be updated every 5 years because of a review or update of the baseline and context analysis, or more frequently because of significant changes in the Life of Asset Plan, or internal or external context. The Social Management Plan is based on the outcomes of the Social and Human Rights Impact and Risk Analysis, which are also incorporated into the site's baseline Workplace Risk Assessment and Controls. The Social Management Plan provides high-level action planning information with respect to community health and safety. The site is currently in the process of developing a specific Community Health and Safety Risk Management Plan.
3.3.4.1.	<p>If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:</p> <ul style="list-style-type: none"> a. In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining; b. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and c. Make information publicly available on its infectious disease mitigation program. 		The site has in place an HIV/ TB policy that notes Kolomela has HIV and TB programs. Onsite interviews with medical staff and observations during site tours verified the communication of these programs to workers. The site has not identified HIV/AIDS, tuberculosis, malaria or other emerging infectious diseases on the Lifecycle Workplace Risk Assessment and Controls.
3.3.4.2.	If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:		Review of the site's HIV/TB Policy identified the site's commitments to resource provision, information, counseling, and treatment for employees. During the onsite assessment, evidence of the provision of free, voluntary, and confidential HIV testing and counselling for all employees was identified. However, evidence was not available to show that risk assessments have been completed demonstrating the

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	<p>a. In relation to HIV/AIDS, the operating company shall, at minimum:</p> <ul style="list-style-type: none"> i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees; ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate; iii. Provide access for contractors to education and other preventative programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members. <p>b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.</p> <p>c. In relation to malaria, the operating company shall, at minimum:</p> <ul style="list-style-type: none"> i. Develop a vector control plan; ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing. 		understanding of the level of significance of community exposure to HIV/AIDS, tuberculosis, and malaria from mine-related activities.
3.3.5.1.	The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities	✔	In early 2021, the site presented and met with community members at the Stakeholder Day event to discuss the Kapstevell South Project and the anticipated impacts to communities. The Community Health and Safety Scoping Report, in

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	and individuals or representatives of vulnerable groups, in: <ul style="list-style-type: none"> a. Scoping of community health and safety risks and impacts related to mining; b. Assessment of significant community health and safety risks and impacts related to mining; c. Development of prevention or mitigation strategies; d. Collection of any data needed to inform the health risk and impact assessment process; and e. Design and implementation of community health and safety monitoring programs. 		draft, has been provided to the community for public review. Onsite tours are provided, including visiting the community health clinic, hospital, and community youth center. Interviews with medical staff confirmed that the site continues to engage with community medical and social services professionals on the development of prevention and mitigation strategies.
3.3.6.1.	The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.	☑	The site has conducted Stakeholder Engagement Day and community health and safety workshop events. The events included discussion of the Health Impact Assessment (HIA), community health and safety areas, stakeholder engagement, etc.
Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas			
	Chapter not assessed	—	IRMA is not scoring this chapter in 2022, just collecting information to help inform future guidance on chapter implementation.
Chapter 3.5—Security Arrangements			
3.5.1.1.	The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of	☑	The Social Way Policy 3.0 notes that Anglo American respects human rights and supports the UN Guiding Principles on Business and Human Rights (UNGPs) and applies the Voluntary Principles on Security and Human Rights (VPSHRs). The Mine demonstrates a commitment to not supporting security providers that have been implicated of human rights infringements through an annual due diligence assessment of security providers and personnel.

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	international humanitarian law or the excessive use of force.		The Anglo American Social Way 3.0 Policy and SW Toolkits are publicly available.
3.5.1.2.	<p>Critical The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:</p> <ul style="list-style-type: none"> a. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force; b. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and c. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. 	✔	<p>The site has in place a Rules of Engagement Policy which states that security personnel only use required force to effect an arrest. The Rules of Engagement doc provides reference to the Voluntary Principles on Security and Human Rights when making an arrest. Use of force in proportion to the threat.</p> <p>During interviews, it was reported that all security staff receive Voluntary Principles on Security and Human Rights training as part of onboarding, and refreshers are provided annually.</p>
3.5.1.3.	<p>If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:</p> <ul style="list-style-type: none"> a. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms; b. Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and c. Outlines required training for security personnel. 	✔	<p>The site makes use of private security and has in place a signed contract with the security company.</p> <p>Pg 52 to 54 of the contract provides expectations, and highlights commitment to the Voluntary Principles on Security and Human Rights. It further provides KPI (Key Performance Indicators) and expectations for the security company.</p>
3.5.1.4.	If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or	—	The Mine has a working relationship with the South African Police Service; however, the South African Police Service are not used to provide security to the Mine. South

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	similar agreement with public security providers that includes similar provisions to those in 3.5.1.3.		<p>African Police Service are called to help maintain law and order outside the Mine, particularly during protests.</p> <p>The site has in place a memorandum of understanding with the local police force. The memorandum of understanding highlights the site's commitment to Voluntary Principles on Security and Human Rights and requires that South African Police Service render services in line with these principles. The memorandum of understanding notes that all personnel must be appropriately trained, and act in line with the law and Voluntary Principles on Security and Human Rights with regard to the use of firearms or force.</p>
3.5.2.1.	The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment.	✔	Evidence demonstrates that the site has considered risks and potential impacts on human rights from security arrangements. A risk assessment relating to security risk is covered in the Security Workplace Risk Assessment and Control Assessment, including potential human rights impacts that could arise from security arrangements. The assessment is updated regularly, and the current version is from 2019, and is the fourth version. Significant changes in community or mining operations trigger the need for an update.
3.5.2.2.	<p>Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall:</p> <ul style="list-style-type: none"> a. Follow a credible process/methodology; b. Be carried out and documented by competent professionals; and c. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice. 	●	<p>The Security Workplace Risk Assessment and Control Assessment contains a methodology used by Anglo American, and documents the stakeholders involved in the process, including site safety officers and security providers.</p> <p>Stakeholder feedback is sought through the stakeholder engagement channels, such as the Stakeholder Day. The stakeholders are given an opportunity to provide feedback on security. Feedback is considered in Workplace Risk Assessment and Control updates.</p> <p>It was reported that Kolomela has a specific procedure for susceptible/ vulnerable groups. ERM did not receive evidence to demonstrate this.</p>
3.5.2.3.	<p>The scope of the security risk assessment shall include, but need not be limited to:</p> <ul style="list-style-type: none"> a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups; 	●	Evidence demonstrates that the Kolomela security risk assessments are comprehensive and meet sub-requirements a. to c. However, it does not include the identification of risks associated with equipment transfer.

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	<p>b. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption);</p> <p>c. Analysis of current and potential conflicts or violence in the host country and affected communities; and</p> <p>d. Risks associated with equipment transfers.</p>		
3.5.2.4.	The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective.	✔	The Workplace Risk Assessment and Controls Assessment contains controls in place to manage identified risks. Additional evidence shows that there are Key Performance Indicators to monitor security incidents and track.
3.5.2.5.	If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform with requirements in IRMA Chapter 1.3.	⊕	The Workplace Risk Assessment Control Assessment notes that crowd control services may be a potential conflict or use of force, some controls are listed in the Workplace Risk Assessment and Control but there is no evidence of a mitigation strategy developed in collaboration with stakeholders.
3.5.3.1.	The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.	✔	<p>Evidence presented demonstrates that the site undertakes a due diligence screening process before contacting security services.</p> <p>Updated annually by internal and external services, or before a new contract is agreed on. The process is documented through Passport360.</p>




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3.5.3.2.	The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.	—	<p>South African Police Service are not used to provide security to the Mine. South African Police Service are called to help maintain law and order outside the Mine or investigate matters pertaining to a breach of law.</p> <p>The site has in place a memorandum of understanding with the local police force. The memorandum of understanding highlights the site's commitment to Voluntary Principles on Security and Human Rights and requires that South African Police Service render services in line with these principles. The memorandum of understanding notes that all personnel must be appropriately trained, and act in line with the law and Voluntary Principles on Security and Human Rights with regard to the use of firearms or force.</p>
3.5.4.1.	Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with particular reference to vulnerable groups, and the company's policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers.	☑	Evidence presented demonstrates that training on the Voluntary Principles on Security and Human Rights has been provided. There is a training matrix for all security officers and the process is managed through Passport 360. Quarterly training of Voluntary Principles on Security and Human Rights in person, and there is now online training. All new staff are given training as part of onboarding.
3.5.4.2.	If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security.	—	South African Police Service are not used to provide security to the Mine. South African Police Service are called to help maintain law and order outside the Mine or investigate matters pertaining to a breach of law. The site has in place a memorandum of understanding with the local police force. The memorandum of understanding highlights the site's commitment to Voluntary Principles on Security and Human Rights and requires that South African Police Service render services in line with these principles. The memorandum of understanding notes that all personnel must be appropriately trained, and act in line with the law and Voluntary Principles on Security and Human Rights with regard to the use of firearms or force.
3.5.5.1.	The operating company shall:	●	Evidence presented shows that security related incidences are reported through the operational level grievance mechanism. The site has in place a Procedure for Conducting of Investigations specifically relating to security criminal investigations,

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	<ul style="list-style-type: none"> a. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force; b. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company's policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies; c. Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers; d. Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings; e. Provide medical assistance to all injured persons, including offenders; and f. Ensure the safety of victims and those filing security-related allegations. 	—	<p>contravention of company policies and procedures pertaining to prevention of loss through criminal action. If an incident is reported concerning security forces, the security team are involved in investigating the incident and work closely with the social performance team in grievance redress. It was reported that the Mine would offer medical assistance if required.</p>
3.5.5.2.	<p>In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents.</p>	—	<p>No such complaints have been received.</p>
3.5.6.1.	<p>If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms.</p>	✔	<p>No such requests have been made, but the site does give feedback pertaining to security at regular stakeholder engagement events.</p>

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3.5.6.2.	The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights.	✓	Evidence presented shows that the Mine has engaged with local government and security providers around security matters. Engage frequently with South African Police Service and have been participating in annual stakeholder day to give feedback.
3.5.6.3.	Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security.	✓	The site has in place a Social Incidents and Grievance Standard Operating Procedure, implemented in 2019. The Grievances 2021 and Social Incidents & Grievances Management Log shows that grievances are being received and responded to by the site.
3.5.6.4.	If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns.	✗	Evidence does not demonstrate alignment with this requirement. There is a document that shares roles and responsibilities and what needs to be done in KOL-EMS_PRO-004.
Chapter 3.6—Artisanal and Small-Scale Mining			
	Chapter Not Relevant	—	There are no artisanal or small-scale mining (ASM) operations in close proximity to the mining project and the mining project is not engaged in commercial relationship with (e.g., sourcing minerals from) any ASM entities regardless of their proximity to the mining project.

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Chapter 3.7—Cultural Heritage			
3.7.1.1.	Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals.	✓	Credentials of competent cultural Heritage professionals that developed Cultural Heritage Management Plan and participated in the more recent Impact Heritage Impact Assessment provided. Evidence of periodic inspection of cultural heritage sites provided. Due to identified high risk of disturbance of heritage sites due to proposed Waste Rock Dumps (WRD), Northeast Waste Rock Dump relocated, design of other Waste Rock Dumps (WRDs) modified to avoid disturbance.
3.7.1.2.	Screening, assessment and the development of mitigation measures and procedures related to the management of cultural heritage shall include consultations with relevant stakeholders.	✓	An updated Cultural Heritage Management Plan indicates consultations with stakeholders took place. Evidence of consultations with the appropriate cultural heritage government agency provided. Quarterly Environmental Forum and Stakeholder Day presentations, attendance lists, and E-Forum website snapshot confirm consultations occurred during screening, assessment, and development of cultural heritage mitigation measures.
3.7.1.3.	Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues.	✓	Stakeholder Day and environmental forum presentations, attendance records, meeting minutes and correspondence confirm consultations with stakeholders. E-Forum website snapshot confirms documents are shared online with interested parties that have attended environmental forums.
3.7.2.1.	Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities.	✓	The development of a new pit can be considered a significant change in mine activity. Updated Cultural Heritage Management Plan and impact assessment reference the screening process and the identification of high-risk cultural heritage areas. Manager interview and documentation of Cultural Heritage presentations to the environmental forum indicate the screening process took place and was shared with interested parties.
3.7.2.2.	If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation	✓	The Cultural Heritage Management Plan evaluates the nature and importance of heritage resources, resources that have been impacted and mitigation measures to prevent impact. Cultural Heritage Management Plan, developed by competent professionals, defines principles for restoration and a management framework that considers compensation. Mitigation measures taken to relocate or modify the

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	measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected.		design of Waste Rock Dumps to avoid disturbance of identified non-critical heritage sites.
3.7.3.1.	<p>When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply:</p> <ul style="list-style-type: none"> a. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it; b. Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it; c. Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and d. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage. 	✔	Heritage assessment study, Cultural Heritage Management Plan and Heritage Impact Assessment demonstrate efforts to identify, avoid or mitigate tangible replicable cultural heritage impacts and follow a mitigation hierarchy.
3.7.3.2.	All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.	✔	The cultural heritage study and Cultural Heritage Management Plan indicate mitigation measures have been carried out by competent professionals, including monitoring, following recognized methodology and mitigation hierarchy.

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3.7.4.1.	<p>The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:</p> <ul style="list-style-type: none"> a. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and b. Any removal of cultural heritage is conducted using the best available technique. 		<p>Operating company policy requires that any tangible nonreplicable cultural heritage is not to be removed. An updated Cultural Heritage Management Plan provided for review. Management interviews and indicated limited stakeholder engagement.</p>
3.7.4.2.	<p>All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.</p>		<p>Evidence indicates that competent professionals have undertaken assessment and mitigation measures. Heritage Impact Assessment details thorough methodology and fieldwork undertaken. Field assessment and recording provides field notes.</p>
3.7.5.1.	<p>Except under exceptional circumstances, the operating company shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:</p> <ul style="list-style-type: none"> a. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and b. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. (Note: Where impacts may occur to indigenous peoples' critical cultural heritage, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples). 		<p>Social Way 3.0 policy and updated Cultural Heritage Management Plan indicate compliance with IRMA section objectives. Cultural Heritage Management Plan defines critical cultural heritage and specific steps that would be taken by external experts to protect critical resources, in collaboration with affected communities. Management interviews and plan indicated limited stakeholder engagement.</p>
3.7.5.2.	<p>When a new mine is proposed within a legally protected cultural heritage area, including areas</p>	<p>—</p>	<p>The site is not a new mine or within a protected area. The study and plan indicate compliance. There is no evidence of plans to enhance conservation of protected</p>

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	<p>proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:</p> <ul style="list-style-type: none"> a. Comply with the requirement 3.7.5.1; b. Comply with the protected area's management plan; c. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and d. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. 		<p>areas. However, it was set aside by the mine for a potential offset. The National Environmental Conservation Area Act does not apply, not in a protected area from a cultural heritage perspective.</p>
3.7.5.3.	<p>IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).</p> <ul style="list-style-type: none"> · World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; · International Union for Conservation of Nature (IUCN) protected area management categories I-III; · Core areas of UNESCO biosphere reserves. 	—	<p>The site is not a new mine. The study and plan indicate compliance. No evidence of plans to enhance conservation of protected areas. No evidence of adverse impact to any UNESCO reserves or world heritage site.</p>
3.7.5.4.	<p>An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:</p> <ul style="list-style-type: none"> a. The mine was developed prior to the area's official designation; b. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the cultural values for which the area was designated or recognized; and c. The operating company collaborates with relevant management authorities to integrate the mine's 	—	<p>The site is not located within a protected area. Evidence provided by the Environmental Impact Assessment (EIA) draft released for public comment.</p>

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	management strategies into the protected area's management plan.		
3.7.5.5.	To safeguard irreplaceable cultural heritage and respect indigenous peoples' right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation.	●	No evidence provided of Indigenous Peoples living in voluntary isolation. An Indigenous Peoples Study is underway. Consultations with indigenous Peoples representatives on potential cultural heritage impacts are ongoing.
3.7.6.1.	Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development.	✓	Cultural Heritage Management Plan, Heritage Impact Assessment or presentations do not indicate the operating company's use of intangible cultural heritage.
3.7.6.2.	The operating company shall not proceed with such commercialization unless it: <ul style="list-style-type: none"> a. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and b. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions. 	✓	Evidence provided indicates intangible cultural heritage has been discussed with communities and collaboration is taking place.
3.7.6.3.	Where the operating company proposes to use indigenous peoples' cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples.	—	Interviews with managers do not indicate the existence of or the use of Indigenous Peoples Cultural Heritage for commercial purposes. An Indigenous Peoples Study was complete in 2020 and concluded that Mine does not impact on any legal or customary rights or interests of indigenous peoples.



Requirement #	Requirement Text	Rating	Basis for rating
3.7.7.1.	A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage.	✔	Cultural Heritage Management Plan, heritage study and Heritage Impact Assessment document planning, activities and mitigations developed by competent cultural heritage professionals provided.
3.7.7.2.	<p>If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:</p> <ul style="list-style-type: none"> a. Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed; b. Managing potential impacts to c. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and d. If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage. 	●	Updates to the Cultural Heritage Management Plan include a chance find procedure. This procedure is developed by competent professionals. Evidence of stakeholder reporting on chance finds is provided. Consultations with Indigenous Peoples is ongoing.
3.7.7.3.	The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management.	✔	Updated Cultural Heritage Management Plan includes a Chance Find Procedure. Evidence provided regarding Toolbox Talks on Chance Find Procedure and Cultural Heritage Management indicates staff are receiving training in chance find procedure and cultural heritage management. Correspondence shared requesting Cultural Heritage Management Procedure be posted on notice boards. Shock Awareness Heritage presentation shared indicating staff were made aware of cultural heritage destruction at a mine in Australia.

Principle 4: Environmental Responsibility

RATING LEGEND




Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant



Requirement #	Requirement Text	Rating	Basis for rating
Chapter 4.1—Waste and Materials Management			
4.1.1.1.	The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities.		'Currently, waste management is highlighted in the Kolomela Safety Health Environmental and Quality (SHEQ) policy through the commitment of leadership to the "Protection of Environment through Efficient and Sustainable use of natural resources by employing the principle of pollution prevention, reduction, recovery, re-use and recycling of waste." However, the Safety, Health, Environmental and Quality (SHEQ) policy does not comply with all the IRMA requirements.
4.1.1.2.	The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum: <ol style="list-style-type: none"> Having the policy approved by senior management and endorsed at the Director/Governance level of the company; Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities; 		The mine has a commitment towards achieving zero waste to landfill. Waste management is highlighted in the Kolomela Safety Health Environmental and Quality (SHEQ) policy through the commitment of leadership through the "Protection of Environment through Efficient and Sustainable use of natural resources by employing the principle of pollution prevention, reduction, recovery, re-use and recycling of waste." The Safety Health Environmental and Quality (SHEQ) policy is signed by the general manager and displayed on notice boards across the site. Employees sign a declaration of understanding signed by all the employees at the mine. A process is in place to make employees aware of the policy, but no evidence is available with assessments being undertaken by the mine so that employees

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> c. Having procedures and/or protocols in place to implement the policy; and d. Allocating a sufficient budget to enable the effective implementation of the policy. 		demonstrate understanding of the Safety Health Environmental and Quality (SHEQ) policy/procedure based on job description.
4.1.2.1.	<p>The operating company shall:</p> <ul style="list-style-type: none"> a. Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and b. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. 	✔	<p>The mine has an approved Waste Management Strategy (WMS). One of the objectives of the Waste Management Strategy is to provide guidance on the storage, handling and disposal of various waste streams that are hazardous or dangerous.</p> <p>The mine has developed a waste inventory that identifies all the waste streams on site and details waste other than mine waste. This is separated and reported based on waste categories to enable monitoring of the waste streams and collection by the appointed licensed operator.</p> <p>Specific hazardous waste controls are documented within additional procedures support the WMS. The Procedure for Handling Medical Waste and the Procedure for Waste Management were submitted for review. The procedures include the safe handling, safe transport, storage and disposal of waste.</p>
4.1.3.1.	<p>The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities.</p>	✔	<p>A waste assessment report (October 2021) was prepared by EXM Environmental Advisory. The primary objective of the assessment was to determine the chemical nature and character of the waste rock dump (WRD) and tailings storage facility (TSF) material and to determine their pollution-generating potential, including acid rock drainage (ARD) or acid mine drainage (AMD). The assessment concluded no potential for acid mine drainage / acid generation exists at the mine. This can be ascribed to the high neutralization potential (NP) and low sulfide concentrations. Furthermore, based on the outcome of an Independent Technical Review of the Kolomela Tailings Storage Facility (TSF) performed by SLR Consulting in 2020, it was found that there are no Tailings Storage Facility (TSF) stability issues.</p> <p>The Tailings Storage Facility (TSF) is classified as a medium hazard facility under the SANS 10286 Safety Class and according to the SANS 0160 –Seismic Hazard Zone Classification, is in an area with no known seismic activity, thus susceptibility to fail during a seismic event is considered low.</p> <p>There are no communities located within proximity of the mine. The nearest community is located 22km from the mine.</p> <p>Based on the above, potential impacts on human health, safety, the environment, and communities are considered low.</p>

Requirement #	Requirement Text	Rating	Basis for rating
4.1.3.2.	<p>The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:</p> <ul style="list-style-type: none"> a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW); b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include: <ul style="list-style-type: none"> i. Analysis of petrology, mineralogy, and mineralization; ii. Identification of geochemical test units; iii. Estimation of an appropriate number of samples for each geochemical test unit; and iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit. c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility; d. Water balance and chemistry mass balance models for each facility; and e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. 	✔	<p>The Kolomela Mineral Waste Streams Assessment and Mining Residue Facilities Impact Report (2016) provides an assessment of the waste streams as per the requirements highlighted in this chapter, including geochemical characterization and classification of Acid Rock Drainage (ARD) potential. A conceptual site model has been included in the Mineral Waste Assessment Report and includes the environmental setting. This report also provides a detailed description of the facility in terms of geology, hydrogeology, and hydrology. The Kolomela Climate Risk Assessment Report highlights the key climate-related risks that are likely to be relevant for the mine, considering potential future climate change impacts. In support of this, the mine has also developed recommendations and actions to address the impacts.</p> <p>A mineral waste assessment was performed in 2016 in line with the National Norms and Standards for the Assessment of Waste for Landfill Disposal (GN R.635 of 23 August 2013). The purpose of this assessment was to determine the type of waste and the correct barrier design requirements for disposal.</p> <p>A waste assessment report (October 2021) was prepared by EXM Environmental Advisory as per the latest requirements for specialist reports as listed in Government Gazette No. 40713, dated 24 March 2017, and Government Gazette No. 40772, dated 07 April 2017, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA (National Environmental Management Act)). The assessment's main objective was to determine the chemical nature and character of the waste rock dump (WRD) and Tailings Storage Facility (TSF) material and their pollution-generating potential (including Acid Mine Drainage / Acid Rock Drainage). A dedicated waste assessment (Golder Associates 2015) indicated that the waste rock and tailings/slimes have a low to minimal potential for "conventional" contamination.</p> <p>The Kolomela Mine Salt Balance Report provides an assessment of the water and salt balances for the mine.</p>
4.1.3.3.	<p>The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:</p>	●	<p>An Independent Technical Review of the Kolomela Tailing Storage Facility (TSF) conducted in 2020 by SLR Consulting did not identify any Tailings Storage Facilities (TSF) stability issues at the mine. Furthermore, potential for catastrophic failure is considered low, as the tailings are fully contained within a compacted calcrete wall that includes appropriate foundation preparation under the wall.</p> <p>The mine has Standard Operating Procedures (SOP) for the operation of Tailings Storage Facilities (TSFs) and the return water dam. An operational manual that goes together with the SANS 10286 Code of Practice (COP) for Mine Residue</p>


Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> a. Detailed engineering reports, including site investigations, seepage and stability analyses; b. Independent technical review (See criteria 4.1.6) c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment; d. Descriptions of facility design criteria; e. Design report(s); f. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns; g. Master tailings placement plan (based on life of mine); h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report; i. Facility water balances (See also 4.1.3.2.d); and j. Dam breach inundation (if applicable) and waste rock dump runout analyses. 		<p>Deposits, as well as the mineral residue management standard of the Anglo American group is in place. The Code of Practice (COP) includes the safety classification of Tailings Storage Facility (TSF's) in terms of the SANS 10286 Code of Practice (COP) for Mine Residue Deposits. This classification gives rise to minimum requirements for the design, operation, and decommissioning of the facility, with the operational requirements component incorporated in the Standard Operating Procedure document. The Standard Operating Procedure also discusses five levels of inspections applicable to the Tailings Storage Facility (TSF) Complex.</p> <p>The designs associated with the tailing's facility were reviewed by the audit team and included Tailings Storage Facility (TSF) design parameters and stability criteria. They also include catastrophic failure modes and critical controls and applicable standards and national legislation.</p> <p>Waste classifications have been conducted for the Kolomela mine. The waste rock dumps design and criteria are included in the Kolomela Mine Rehabilitation Plan 2020.</p> <p>An annual inspection and performance assessment report, covering the period January 2020 to January 2021, was provided for review, and was conducted by the Kolomela Mine Plant Process Specialist (acting) and Tailings Storage Facility (TSF) Complex Supervisor, the CP (Canadian Pacific) and the appointed EOR (Engineer of Record) for the complex.</p> <p>CPod Consulting was appointed in 2021 as external specialists to review the Kolomela Mine Tailings Storage Facility (TSF) consequence classification of structures review obtained in accordance with Anglo American's standard AATS 602-102.</p> <p>The Kolomela Mine Salt Balance Report provides an assessment of the water and salt balances for the mine.</p> <p>The mine did not submit evidence of a standalone placement plan (short-term and long-term) for review.</p>
4.1.3.4.	Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.		The Waste Assessment Report prepared by Golder in 2021 compared the facility characterizations reported in 2016 with present day characterizations. The report includes toxicity characteristics, leach testing and waste classification results.
4.1.3.5.	Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the		Information available provides evidence of conformity to requirement to use predictive tools and models for mine waste facility characterization and continually revise and update over the life of the mine as site characterization data and operational monitoring data are collected.


Requirement #	Requirement Text	Rating	Basis for rating
	mine as site characterization data and operational monitoring data are collected.		<p>The geochemical characterization of the mining residues was done according to the Global Acid Rock Drainage Guide (Global Acid Rock Drainage Guide™, INAP 2012), the Treatise on Geochemistry (Blowes et al. 2005) and the Applied Geochemistry review of waste-rock hydrogeology and geochemistry (Amos et al. 2015).</p> <p>A predictive model has been developed to quantify and manage the associated risks (e.g., identification of pit relaxation zones identification, subsurface support deterioration and subsequent surface settlement, long-term metal leaching due to acid mine drainage).</p>
4.1.4.1.	<p>Critical A risk-based approach to mine waste assessment and management shall be implemented that includes:</p> <ul style="list-style-type: none"> 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). 	✔	<p>A baseline risk assessment has been made available for review and includes environmental, chemical, social, health and safety and physical risks.</p> <p>All waste facilities are consolidated into one risk register titled "Kolomela Issue Based Risk Assessment Waste Facilities." Evidence of the latest risk register was made available for review.</p> <p>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. All risks identified in the baseline risk assessment as having a potential impact rating of 4 (i.e., priority unwanted events) are subjected to bowtie analyses in order to identify critical controls and other controls that are required to prevent the priority unwanted events.</p> <p>The mine has adopted a global operational risk management process (ORMP) that looks at the full lifecycle of the mine, from planning to closure.</p> <p>Third-party assessments of waste facilities were available for review.</p>
4.1.4.2.	<p>The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:</p> <ul style="list-style-type: none"> a. Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses; b. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives; 	⊕	<p>The Kolomela Environmental Impact Assessment and Environmental Management Program Part A report for the mine expansion project discusses four alternatives. A screening analysis was performed to eliminate alternatives that fail to meet minimum specifications. With respect to sensitivity analysis, the report discusses potential environmental impacts and the feasibility of each alternative location.</p> <p>The alternative options analysis has been guided by the Environmental Impact Assessment process and information contained in the existing Kolomela Mine Closure Plan. A comprehensive alternative options analysis for the existing operations has been done previously, and numerous post-closure opportunities have already been identified by Kolomela Mine to mitigate post-closure risks and maximize opportunities for a beneficial end land use.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> c. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications; d. Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative; e. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and f. Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management). 		<p>A 5-year rehabilitation plan has been compiled that documents the mine's "zero waste to landfill" plan. The Executive Summary of the Mine Closure Plan makes reference to alternatives being considered with respect to post-mining land use. It is further stated that these alternatives are subject to further feasibility studies, and because the alternatives are subject to feasibility studies, these have not been assessed. Various potential post-closure land use alternatives have been identified and discussed at Kolomela Mine, ranging from the development of solar energy generation facilities to formalized conservation initiatives on selected properties, some of which have been assessed on an ad hoc basis via independent studies. These alternatives are subject to further feasibility studies.</p> <p>No evidence of "fatal flaw" analysis.</p>
4.1.5.1.	<p>Critical Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).</p>		<p>All considerations made during the design and mitigation of risks of the Tailings Storage Facility (TSF) and associated Waste Rock Dumps are stipulated in the Tailings Storage Facility (TSF) Final Design Report, March 2010. The design approach subscribed to best practice principles and represents a second-generation Tailings Storage Facility (TSF) design.</p> <p>Although other options have been considered for the other waste facilities, it could not clearly be established that the best available technologies (BAT) and best available/applicable practices (BAP) were specifically looked at.</p>
4.1.5.2.	<p>Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:</p> <ul style="list-style-type: none"> a. Priority shall be given to source control measures to prevent generation of contaminants; b. Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent or minimize the movement of contaminants to where they can cause harm; and 		<p>All the mineral waste streams are not hazardous according to SANS 10234, as per the Waste Classification and Management Regulations (GN R.634 of 23 August 2013).</p> <p>Based on semi-quantitative source-terms, seepage classifications and characterization of mineral waste seepage from the mining residue facilities (MRFs) is predicted to have minimal impact on the groundwater. Leachate from the waste rock dumps and tailings is predicted to be neutral mine drainage with low metal content, even under conditions of maximum oxidation.</p> <p>The barrier was evaluated and deemed not practicable, but evidence provided demonstrated wastes were low risk and not posing a risk to the environment.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	c. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes.		
4.1.5.3.	For high-consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide.	—	<p>Evidence of ground and surface water quality monitoring results has been provided for review. Waste material has been declared non-hazardous chemically by third-party lab analyses.</p> <p>The mine has not identified any waste facilities as high consequence. An Independent Technical Review of the Kolomela Tailing Storage Facility (TSF) performed by SLR in 2020 did not identify TSF stability issues at the mine. Furthermore, potential for catastrophic failure is considered low, as the tailings are fully contained within a compacted calcrete wall that includes appropriate foundation preparation under the wall.</p> <p>The above was confirmed by the issue-based risk assessment, 2021.</p>
4.1.5.4.	Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling and other relevant information.	⚠	<p>The mine has an approved Waste Management Strategy (WMS). One of the objectives of the WMS is to provide guidance on the storage, handling and disposal of various waste streams that are hazardous or dangerous.</p> <p>A predictive model has been developed to quantify and manage the associated risks (e.g., pit relaxation zones identification, subsurface support deterioration and subsequent surface settlement, long-term metal leaching due to acid mine draining (AMD).</p> <p>A waste management procedure has been provided for review, and reportedly a model has been developed for the waste rock dump designs.</p> <p>Mine waste management strategies are informed by site-specific characteristics, modeling, and other relevant information, however, there is insufficient evidence to confirm that it has been developed in an interdisciplinary and interdepartmental manner.</p>
4.1.5.5.	<p>The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:</p> <p>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters;</p>	✔	<p>The mine provided the audit team with a summary presentation of the Kolomela Mine Tailings Storage Facility (TSF) Complex that included details on the performance objectives, risk management strategies and associated controls. Performance objectives highlighted in the presentation included design disposal life, design disposal capacity, required minimum freeboard levels during normal and abnormal weather events, and return water system pumping and process supply level capacities. It was noted that no seismic design requirements were considered due to the mine being located in an area with no known seismic activity, as per SANS 0160 Seismic Hazard Zone Classification. In 2020, the mine reviewed the Mine Closure Plan and also updated the rehabilitation plans. The new plan aimed at closing the loop by integrating rehabilitation and mine closure into</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> b. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices; c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility; d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. 		<p>the life of mine plan, starting with the review of the current waste rock dump designs to align them with rehabilitation and closure objectives.</p> <p>The mine's Code of Practice for Mine Residue Deposits documents the practices and procedures to be applied to Kolomela Mine's tailings disposal in order to maximize the safe and effective achievement of the disposal. The Code is a management tool intended to add value to and enhance the operation.</p> <p>The Kolomela TSF summary presentation also provided the audit team with an overview of inspection, monitoring and surveillance requirements. Catastrophic failure modes and critical controls were outlined for slope failure, overtopping, failure of the decant system and washaways. A comprehensive Operational Management Plan and TSF Standard Operating Procedures were reported to be in place. The Draft Kolomela Mine Annual Integrated Water and Waste Management Plan (May 2021) and the Tailings Storage Facility Standard Operating Procedures (January 2016) were provided to and reviewed by the audit team. Surveillance activities were also presented, which included daily Foreman inspections, Section Manager and Civil Engineer monthly inspections, Engineer-of-Record (EOR) quarterly inspections (including Plant Manager, Section Manager of Production and Civil Engineer), and EOR Annual TSF audit. Evidence of the 2020, 2019 and 2018 annual independent inspections and performance reports were provided for review. A SHE Integrated Management Review for 2021 was also available for review.</p>
4.1.5.6.	<p>Critical 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>Evidence of the 2020, 2019 and 2018 annual independent inspections and performance reports were provided for review. A Safety, Health and Environmental (SHE) Integrated management review for 2021 was reviewed by the audit team; no evidence of any deviation from the elements of this requirement was identified.</p> <p>Review meetings are scheduled at regular intervals to suit the construction and operational activities. The minimum frequency for the Technical Review Panel meeting is one meeting per annum. This meeting will inform the updates of risk assessments, objectives and inform the management review.</p>
4.1.5.7.	The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste	☑	The mine's Operational Risk Management Programme Procedure describes the process of identifying health and safety hazards and environmental aspects and impacts. The procedure also outlines the process of assessing and prioritizing risks

Requirement #	Requirement Text	Rating	Basis for rating
	facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities.		<p>associated with each hazard or group of hazards, and identifying controls and other actions that must be implemented to manage risks to within acceptable levels. The procedure addresses requirements of Clause 6.1.2 & 8.1.2 of ISO 45001:2018, 6.1.2 of ISO 14001:2015 and section 6a & 6c of Anglo American Safety, Health and Environmental (SHE) Way.</p> <p>A Section 23 register has been provided and includes corrective actions. The Dump to Plan Compliance Report for waste rock dumps and corrective actions was also made available.</p>
4.1.5.8.	<p>The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:</p> <ol style="list-style-type: none"> a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and b. Be documented, and the results reported to an accountable executive officer. 		<p>The inspections and performance monitoring provide Kolomela Mine plant management and the Tailings Storage Facilities (TSF) Complex operating personnel with information to assess whether the TSF and Return Water Dam (RWD) are being operated and developed in accordance with the tailings facility's design specifications, the Code of Practice (COP) for Mine Residue Deposits and Standard Operating Procedures, and hence at an acceptable level of risk.</p> <p>Evidence of the 2020, 2019 and 2018 annual independent inspections and performance reports were provided for review. A SHE Integrated Management Review for 2021 was also available for review.</p> <p>The following monitoring and control measures have been instituted by Kolomela Mine to review its compliance with the COP and its annexures, with which must be complied:</p> <ul style="list-style-type: none"> - Daily production meetings of TSF operating personnel with the plant foreperson, including the submission of daily inspection, monitoring and maintenance check sheet documentation at the meeting, and to be signed off by the foreperson - Weekly TSF Complex operational review meetings (foreperson) with the Section Manager Production, including sign-off of a meeting attendance register. - Monthly TSF Complex COP compliance review meeting (foreperson), with the Section Manager Production <p>Review of the Terms of Reference for the Independent Technical Review Panel (TRP) on Hydraulically Placed Residue and Associated Facilities (November 2019) does not include the Mining Association of Canada's Tailings Management Protocol or a similar framework in the Scope of Review. The Terms of Reference include in the reporting requirements final reporting within 20 business days to the Operation General Manager, the Kumba Iron Ore Principal Civil Engineer, the Kumba Iron Ore Head of Engineering and the Anglo American (Corporate) Head of Mineral Residue. The Independent Technical Review of the Kolomela Tailings</p>


Requirement #	Requirement Text	Rating	Basis for rating
			<p>Storage Facility and Associated Works final report (February 2020) include the following references:</p> <ul style="list-style-type: none"> - Australian National Committee on Large Dams - Guidelines on Tailings Dams (ANCOLD, 2019) - Canadian Dam Association – Technical Bulletin: Tailings Breach Analyses, Draft 8.01, February 2019 - ICMM, UNEP & PRI - Global Industry Standard on Tailings Management, August 2020
4.1.6.1.	<p>The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle.</p>		<p>A Technical Review Panel (TRP) has been formed, which is an independent team appointed by Kumba Iron Ore to provide review, independent opinion and expert guidance on planning, design, construction, operational and closure issues on Kumba Iron Ore's mineral residue deposits. In addition, independent assessment of the tailing's facility is undertaken annually in conjunction with the Kolomela person/s responsible.</p> <p>Review meetings are scheduled at regular intervals to suit the construction and operational activities. The minimum frequency for the Technical Review Panel (TRP) meeting is one meeting per annum; however, the frequency of meetings is also dependent on the perceived risk at the operation. In some instances, the Technical Review Panel may be requested to review and comment upon a specific report, incident, or event, in which case the Technical Review Panel meetings may be limited to a teleconference/videoconference with a follow-up Technical Review Panel report.</p> <p>The scope of work performed by the Technical Review Panel includes review of the following aspects of mineral residue deposits:</p> <ul style="list-style-type: none"> - Life of facility and life of mine planning - Engineering design - Construction practices - Operational and maintenance practices - Closure and post-closure requirements - Environmental and water management - Management systems - Risk management - Budget and staffing

Requirement #	Requirement Text	Rating	Basis for rating
			- Emergency preparedness and response planning
4.1.6.2.	Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body.	✓	An annual inspection report and tailings facility interim performance assessment was drafted in February 2021 and prepared by cPod Consulting. The inspection report was prepared by a registered engineer from cPod Consulting and reviewed by another registered engineer. The Independent Technical Review of the Kolomela Tailing Storage Facility performed by SLR Consulting in 2020, found that there are no Tailing Storage Facility stability issues at the mine. Furthermore, the potential for catastrophic failure is considered low, as the tailings are fully contained within a compacted calcrete wall that includes appropriate foundation preparation under the wall.
4.1.6.3.	Independent reviewers shall be objective, third-party, competent professionals.	✓	Kolomela annually appoints a third party to assess the tailing's facility. An annual inspection report and tailings facility interim performance assessment was drafted in February 2021 and prepared by a registered engineer from cPod Consulting. The engineer was not an employee of Kumba and independent was not involved with the design or operations of the facility.
4.1.6.4.	Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner.	⬇	Terms of Reference for Independent Technical Review Panel (TRP) on hydraulically placed residues and associated facilities has been drafted. Head of Engineering, , sits on the TRP, as does the general manager at Kolomela. The audit team was unable to confirm the accountability relationship between independent reviewers and the executive officer of the operating company.
4.1.6.5.	The operating company shall develop and implement an action plan in response to commentary, advice or recommendations from an independent review, document a rationale for any advice or recommendations that will not be implemented, and track progress of the plan's implementation. All of this information shall be made available to IRMA auditors.	⊕	The Technical Review Panel Audit Actions report summarizes potential issues and concerns that have been identified and includes recommendations / mitigation actions and timelines for each finding. Although it has been stated that some of the actions have been completed, documentation confirming these actions has not been provided (i.e., meeting notes where progress was reported to accountable executive officers or mining project management).
4.1.7.1.	Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities.	✓	Proposed project descriptions have been communicated to stakeholders. Although the presentation does not discuss waste management options, the final design of the mine waste facilities, including alternatives, are discussed in the Environmental Impact Report submitted for public comment.

Requirement #	Requirement Text	Rating	Basis for rating
			The Scoping Report was distributed for a period of 30 days to the identified interested and affected parties and correspondence received from the interested and affected parties.
4.1.7.2.	Emergency preparedness plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers' representatives, and in collaboration with first responders and relevant government agencies. (See also IRMA Chapter 2.5).	☑	<p>A procedure for emergency preparedness and response planning is in place for Kolomela; however, confirmation of consultations with representatives of affected communities and local government have not been provided.</p> <p>The tailings facility is not regarded as high-risk at the moment. The water levels are still well below where the embankment walls are constructed. Nevertheless, a stakeholder mapping exercise has been undertaken to determine those that would be most affected should there be an emergency. Contact details of stakeholders are included in the procedure and communication with stakeholders took place during the recent Stakeholder Day in April 2021.</p> <p>A public information sharing meeting was held on 30 November 2021 regarding the expansion projects. In the presentation, provision for an area of relaxation and safety berms around pits was discussed. The mine has indicated that the tailings waste facility does not pose a significant risk that has the potential to result in emergency situations.</p>
4.1.7.3.	Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. (See also IRMA Chapter 2.5).	☑	<p>Emergency drills are held twice a year. Based on the outcome of an independent technical review of the Kolomela Tailings Storage Facility (TSF) performed by SLR in 2020, the independent reviewer found that there are no TSF stability issues at the mine.</p> <p>The tailings facility is not regarded as high-risk at the moment. The water levels are still well below where the embankment walls are constructed. Considering the above, the likelihood of a catastrophic failure of mine waste facilities occurring is low.</p>
4.1.7.4.	If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies.	—	There haven't been any requests for information from stakeholders relating to the management of mine waste facilities.
4.1.8.1.	Critical At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA.	☑	The mine is not situated in an area where there is a riverine, submarine or lake, therefore there is no direct disposal into any one of these receptors.

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Chapter 4.2—Water Management			
4.2.1.1.	The operating company shall identify water users, water rights holders and other stakeholders that may potentially affect or be affected by its mine water management practices.	☑	Stakeholders, as well as water rights holders, have been identified, monthly meetings are held with a task team and quarterly feedback meetings are held with the wider community. A stakeholder database was compiled as part of the legal process to apply for a Water Use License.
4.2.1.2.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices.	☑	The Golder and Associates report of 2020-2021 was commissioned to understand the water use in the greater regional area. Kolomela has regular meetings with the Sedibeng municipality to discuss the findings of research regarding the current and future uses of water. Some of the meetings are attended by the regional authorities as well.
4.2.1.3.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels, and shall take steps to contribute positively to local and regional water stewardship outcomes.	☑	Kolomela conducts studies and research to understand the water use and quality of the wider Sedibeng municipal area. (Golder and Associates report 2020/2021.) The research is conducted including relevant stakeholders, i.e., the municipality, to understand the challenges and opportunities faced. Discussions are also held with authorities at a regional level. The site reported that a good working relationship existed between Kolomela and the authorities responsible for water. The attendance records, for the meetings, were reviewed and found representative of the relevant stakeholders.
4.2.2.1.	The operating company shall gather baseline or background data to reliably determine: <ul style="list-style-type: none"> a. The seasonal and temporal variability in: <ul style="list-style-type: none"> i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project; ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwater) that may be affected by the mining project; and b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project. 	☑	Baseline data has been gathered through various independent studies to fully understand the impact of the mining operations in the area. These studies also include the Sedibeng municipality water users and farmers and other stakeholders that extract water by means of boreholes. This information is also captured in the amended EMPR (Environmental Management Program Report) of 2021.






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4.2.2.2.	<p>The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:</p> <ul style="list-style-type: none"> a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and b. The mine's use of water, and any mining activities that may affect water quantity. 	✔	Kolomela is a water positive mine. Numerous specialist studies have been conducted to identify the impact on water quantities and quality. All results and reports are made available to stakeholders and discussed. The reports show that the relevant stakeholders were involved in the process to determine the information.
4.2.2.3.	<p>Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:</p> <ul style="list-style-type: none"> a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources; b. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels); c. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. 	⚠	The site has developed a groundwater model and water balance model. Evidence was not available to show that the site has made a prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure.
4.2.2.4.	Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected.	✔	The documents reviewed showed that predictive tools and modelling are used by the appointed specialists and the hydrologist onsite. The modelling is done taking into consideration international best practice. As information becomes available that points to a change the models are reviewed and updated.

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4.2.3.1.	<p>The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.</p>		<p>The site conducted a stakeholder environmental forum in March of 2020. However, there is currently no collaboration with stakeholders when determining mitigation plans.</p>
4.2.3.2.	<p>If a surface water or groundwater mixing zone is proposed as a mitigation strategy:</p> <ul style="list-style-type: none"> a. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and b. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum: <ul style="list-style-type: none"> i. Surface water or groundwater mixing zones are as small as practicable; ii. Water in a surface water mixing zone is not lethal to aquatic life; iii. A surface water mixing zone does not interfere with the passage of migratory fish; iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and 	—	<p>The environmental manager confirmed that no water mixing zone has been created at Kolomela.</p>

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	v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable.		
4.2.3.3.	<p>Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:</p> <ul style="list-style-type: none"> a. Being maintained at baseline or background levels; or b. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). 	⊕	<p>The water extracted from the underground sources contains no contaminants and is of a good quality. The reports show that the mine is not contaminating this water and that the water quality remains consistently within the specification.</p> <p>The specification, however, does not comply with the IRMA quality water standards.</p>
4.2.3.4.	Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2).	☑	The site tracks the onsite water balance monthly. This information is shared with the authorities and stakeholders. The water balance shows that the mine is a water positive mine.
4.2.4.1.	<p>Critical (a through e) The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:</p> <ul style="list-style-type: none"> a. Establish a sufficient number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics); b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics; 	☑	<p>The site has developed detailed documents that show the exact sampling points. A third-party contractor, Aquatico, has been appointed to collect monthly water samples from all the boreholes. A monthly report is issued that shows the individual results of all the sampled points.</p> <p>The monthly water balance shows the amount of water extracted during the month for supply to the authorities.</p> <p>A Triggered Action Response Plan (TARP) is in place to manage early triggers for changes in water quality or quantity.</p> <p>Aquatico, is the appointed third party that handles the complete process of collecting samples and reporting on the quality. Aquatico is a registered company that employs professionals and has calibration certificates in place as required. Only certified laboratories are used for the determining of the results.</p>

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	<ul style="list-style-type: none"> c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics; d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities; e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables. 		
4.2.4.2.	<p>Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis.</p>	⊕	<p>The criteria for the water quality are stipulated in the Water Use License issued to the mine in 2008 when the mining commenced. The mine currently uses these criteria to measure water quality against.</p> <p>At the time of the audit the mine had not implemented the IRMA water standards.</p>
4.2.4.3.	<p>The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:</p> <ul style="list-style-type: none"> a. Participation may involve the use of independent experts selected by the community; and b. If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed. 	⊗	<p>Currently, stakeholders are not participating in the water monitoring program.</p>
4.2.4.4.	<p>Critical The operating company shall develop and implement an adaptive management plan for water that:</p>	⊖	<p>At the time of the Stage 2 assessment, the Kumba (Head office) Adaptive Water Management Standard had not been finalized, which was identified as a gap by the audit team. During the Stage 2 follow-up assessment, the audit team reviewed the additional information provided. The evidence reviewed included the "Kumba</p>

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	<p>a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and</p> <p>b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.</p>		Iron Ore Adaptive Water Management Standard" and the "Kolomela Mine Adaptive Water Management Plan", which establishes two environmental objectives, and general trigger levels and actions. The trigger levels reference Site-Specific-Trigger-Values (SSTVs). The "Integrated Water and Waste Management Plan" is referenced by the Adaptive Water Management Plan and includes information such as monitoring locations. Additional supporting documentation was presented to the audit team, explaining the relationship between the Kolomela Adaptive Water Management Plan, the Kumba Adaptive Water Management Standard, and the Integrated Water and Waste Management Plan. Collectively these plans outline adaptive management actions to mitigate impacts on current and future uses of 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.
4.2.4.5.	Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes.	⊗	Kolomela has not finalized an adaptive water management plan that complies with IRMA standards.
4.2.4.6.	Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans.	⊗	Kolomela has not finalized an adaptive water management plan that complies with IRMA standards.
4.2.5.1.	<p>The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities:</p> <p>a. Monitoring data for surface water and groundwater points of compliance; and</p> <p>b. Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations.</p>	⊕	The results of the quality and quantity of groundwater and surface water are not published on the mine website; it is, however, shared with farmers at the quarterly meetings. The results are also released to the authorities.
4.2.5.2.	The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders in the event that there are changes in water quantity or	⊙	The Emergency Response Plan (ERP) includes the procedure for response to stakeholders in case there is a change in water quality and/or quantity. This is captured in the Triggered Action Response Plan (TARP) which forms a part of the overall Emergency Response Plan.

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	quality that pose an imminent threat to human health or safety, or commercial or natural resources.		
4.2.5.3.	The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders.		The mine has regular meetings with farmers and the authorities to discuss. No other stakeholder engagement sessions are held with other stakeholders nor is it clear the extent to which other stakeholders should be informed or involved in these discussions.
Chapter 4.3—Air Quality			
4.3.1.1.	The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations.		In 2021, Kolomela Mine had an emissions inventory conducted to identify the following pollutants: benzene, toluene, ethyl benzene and xylene. The Dust Watch program monitors and measures particulate matter in the atmosphere that is smaller than 100 microns. Monthly monitoring reports for particulate matters PM 10 and PM 2.5 are prepared by an external service provider.
4.3.1.2.	During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area.		In 2002, a baseline air quality assessment was conducted. In 2005, an environmental impact assessment was conducted, including an air quality assessment. The terms of reference of the air quality impact assessment report (2006) included a baseline air quality characterization. In 2015, and updated in 2021, an air quality impact assessment was conducted for the proposed amendments and expansions at the Kolomela Mine. The assessment included a study of the receiving environment and the quantification and assessment of the impact of the mine on human health and the environment. The quantification of sources of emission was limited to current and proposed operations at the mine. According to the Atmospheric Emissions License issued to Kolomela Mine, an Air Quality Impact Assessment was also conducted in 2013 and included a baseline assessment of the volatile organic compound (VOC) emissions from the petrol and diesel storage tanks.
4.3.1.3.	If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts.		The 2006 Air Quality Impact Assessment identified and quantified all sources of atmospheric emissions, including all routine and upset sources of emissions. Ground level PM10 concentrations and dust fallout were simulated for construction, operation, and closure phases of the Kolomela Mine.
4.3.1.4.	The assessment shall include the use of air quality modeling and monitoring consistent with widely		The 2006 Air Quality Impact Assessment simulated particulate concentrations and deposition rates associated with the proposed Kolomela mining operations using

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	accepted and documented methodologies to estimate the concentrations, transport and dispersion of mining-related air contaminants.		the United States Environmental Protection Agency (USEPA)-approved Industrial Source Complex Short Term (version 3) model (ISCST3). According to the Atmospheric Emissions License issued to Kolomela Mine, the Air Quality Impact Assessment, including the baseline assessment of the volatile organic compound (VOC) emissions from the petrol and diesel storage tanks, provided emissions rates estimated using US AP42 "5.2 Transportation and marketing of petroleum liquids" emission factors. Recently completed emissions inventories use the United States Environmental Protection Agency (USEPA) guideline "Protocol for Equipment Leak Emission Estimates," Environmental Protection Agency (EPA)-453/R-95-017.
4.3.2.1.	Critical If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.	☑	The Kolomela Mine Procedure for Environmental Air Quality, Emissions & Noise Management outlines the responsibilities related to air quality, emissions, and noise management, defining the minimum requirements to achieve compliance obligations and enhancement of air quality, emissions and noise performance. Dust, gaseous emissions and noise released through mining and processing Duri activities are all included in the scope of the procedure that is applicable to the entire lifecycle of Kolomela Mine. The Dust Action Plan identifies specific actions to control and mitigate dusting events. Individuals are assigned responsibilities and deadlines under the action plan. Dust was identified as a risk during the EIA process, and specialist studies have been done to quantify and qualify the effect of dust on the mine. During the onsite visit it was noted that the dust, in the working pits and where trucks were moving, was effectively controlled with very little visible onsite dust.
4.3.2.2.	Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life.	🕒	Specialist Reports dated 2015 and 2021 were reviewed that discuss the air quality, taking into consideration the proposed expansions on the mine. These reports are used to inform and update the Mine Dust Action plan. The plan was reviewed and found to be up to date with the information from the reports. However, it was noted that not all the completion dates for the tasks listed have been achieved.
4.3.3.1.	The operating company shall monitor and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring.	☑	The Credentials of the three auditors of the 2020 Emission Inventory for the Kolomela Mine were submitted for review. A specialist company developed the monthly air quality plan. The monitoring plan includes the placement of instruments and the frequency of sample collection. Kolomela has also appointed an in-house Air Quality Specialist to oversee the monitoring plan.
4.3.3.2.	Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with	☑	Monthly air quality monitoring reports include a summary of data from all the particulate matters PM 10 and PM 2.5 monitoring stations situated around the mine site and within the adjacent community. Dust fallout data reports provide photos and GPS locations of dust monitoring stations around the mine site.

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	the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results.		
4.3.4.1.	<p>New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:</p> <ul style="list-style-type: none"> a. If a mine is located in an air shed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or b. If a mine is located in an air shed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards, and make incremental improvements to the air quality in the air shed that are at least equivalent to the mining project's emissions. 	—	Not scored during the launch phase.
4.3.4.2.	<p>As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:</p> <ul style="list-style-type: none"> a. New and existing mines shall comply with host country air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard; b. Where compliance is met for host country standards but the mine experiences a residual risk 	—	Not scored during the launch phase.

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	<p>related to its air emissions, then more stringent international best practice standards shall apply;</p> <p>c. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and</p> <p>d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines.</p>		
4.3.4.3.	Dust deposition from mining-related activities shall not exceed 350 mg/m ² /day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination.	—	Not scored during the launch phase.
4.3.5.1.	The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available, or made available to stakeholders upon request.	☑	<p>Extensive air quality monitoring records were provided by the mine, along with several presentations and community member attendance records.</p> <p>The mine conducts a quarterly forum with stakeholders to discuss the results of the air quality monitoring. Several presentations were submitted for review and were found to be compliant.</p> <p>Public participation, including stakeholder engagement, is conducted during the Environmental Impact Assessment (EIA) process, and air quality is on these engagements' agenda.</p>
Chapter 4.4—Noise and Vibration			
4.4.1.1.	The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project's noise and/or vibration. Screening is required at all new mines, and also at existing mines if there is a proposed change to the mine plan that	📍	The document reviewed provided the evidence required by the IRMA standard. Airshed was appointed to conduct a study of the receiving (baseline) acoustic environment, including: (a) the identification of noise sensitive receivers (NSRs) from available maps and field observations; (b) a study of environmental noise attenuation potential by referring to available weather records, land use and topography data sources; and (c) determining current noise levels through the analysis of sampled environmental noise levels obtained from surveys conducted

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	is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels.		in November 2017 and January 2018. An impact assessment was conducted that included: (a) the establishment of a source inventory for proposed activities; (b) noise propagation simulations to determine environmental noise levels because of the project; (c) the screening of simulated noise levels against environmental noise criteria; and (d) the identification and recommendation of suitable mitigation measures and monitoring requirements.
4.4.1.2.	If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors.	⊖	Areas have been identified that should be monitored biannually (once in the winter and once in the summer). However, no evidence of baseline ambient noise levels has been submitted.
4.4.2.1.	If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00 (i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are necessary and/or appropriate because of local, cultural or social norms.	⊕	No updated baseline information that covers both blasting and operational noise levels provided beyond 2018. Airshed was appointed in 2018 to measure noise levels. Baseline measurements were recorded. The measurements were conducted at different times in the day and also during winter and summer. No exceedances, as per the IRMA requirements, were recorded during normal operating conditions (excluding blasting operations.) The impact area of Kolomela will reach a maximum in 2024 when mining activities will be most widespread. This will be verified during the surveillance audit. No information post 2018 was available for review.
4.4.2.2.	The following exceptions to 4.4.2.1 apply: a. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or b. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met.	⊖	Site asserts that baseline noise levels do not exceed 55 dBA (day), and 45dBa (night) a, based on the 2018 Noise Impact Study conducted by specialist company Airshed. No documents to show ongoing monitoring of noise levels during daytime and blasting was submitted for review.
4.4.2.3.	If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at	—	The mine was appointed third-party specialists to conduct noise impact studies in 2010, 2015 and 2018. Several farms are situated close to the mine perimeter. No documents were submitted to show ongoing monitoring of noise to ensure the 70dB limit is not exceeded.

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	the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA.		
4.4.2.4.	<p>If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows:</p> <ul style="list-style-type: none"> a. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period; b. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and c. Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time. 	⊗	The mine reports that blasting is limited to daytime only. Furthermore, only one blast per pit per week is carried out. To an extent possible, the mine tries to avoid blasting on cloudy days as it is known that sound travels further on overcast days. The noise readings for blasts on the perimeter of the mine does not exceed 20dBA.
4.4.2.5.	<p>Mines may undertake blasting outside of the time restraints in 4.4.2.4.b when the operating company can demonstrate one or more of the following:</p> <ul style="list-style-type: none"> a. There are no nearby human noise receptors that will be impacted by blasting noise or vibration; b. Alternative hours are necessary and/or appropriate because of local, cultural or social norms; and/or c. Potentially affected human receptors have given voluntary approval for the expanded blasting hours. 	⊗	.No information was submitted for review to support the arrangements made when blasting took place outside of the time restraints
4.4.2.6.	<p>If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the operating company shall consult with affected stakeholders to develop mitigation strategies or other proposed actions to resolve the complaint. Where complaints are not resolved then other options, including noise monitoring and the implementation of additional mitigation measures, shall be considered.</p>	⊙	No evidence was submitted to show that any credible, supported complaints with respect to noise or vibration were received.

Requirement #	Requirement Text	Rating	Basis for rating
4.4.2.7.	All noise- and vibration-related complaints and their outcomes shall be documented.	☑	No official complaints have been reported. However, the mine did report that one of the farmer's houses was repaired, in good faith, as it could not be shown that blasting was the cause. It was not a formally lodged complaint. This was in January 2021 after some cracks appeared. The mine did not treat this as a formal complaint and therefore no documented proof was submitted.
4.4.3.1.	When stakeholders make a noise-related complaint, the operating company shall provide relevant noise data and information to them. Otherwise, noise data and information shall be made available to stakeholders upon request.	—	This requirement has been marked not relevant as there have been no official complaints lodged.
Chapter 4.5—Greenhouse Gas Emissions			
4.5.1.1.	<p>Critical The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:</p> <ul style="list-style-type: none"> a. Identifying and measuring greenhouse gas emissions from the mining project; b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project; c. Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and d. Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions. 	☑	Anglo American has committed to becoming carbon neutral across their operations by 2040. Operational emissions reductions are to be achieved through renewable electricity, low carbon power sources, methane capture and energy efficiency. The Group Climate Change Policy includes a commitment to measuring and reporting on group-wide direct, indirect, and product-related emissions, and regularly updating the board, investors, host governments and other relevant stakeholders on their progress in reducing carbon emissions and energy consumption.
4.5.2.1.	The operating company shall comply with emissions quantification methods described in a widely accepted reporting standard, such as the Greenhouse Gas Protocol Corporate Standard or the Global Reporting Initiative's GRI 305 emissions reporting standard.	☑	Group Global Reporting Initiative (GRI) Standards Contents Index indicates that GRI 305, specifically GRI 305-1 through GRI 305-7, are identified as material within its sustainability reporting. Sustainability Data (2013-2020) shows that Scope 1 and 2 emissions have been quantified for Kumba Iron Ore. The Anglo American specified CO2 Conversion and Energy Conversion Factors as set out in the Document Titled Rules of the S&SD Database Environment.

Requirement #	Requirement Text	Rating	Basis for rating
4.5.3.1.	The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy.	☑	For Kolomela to achieve the targets that have been set by Anglo American Corporate Kolomela has developed an action plan to achieve the set targets. The action plan mainly concentrates on renewable electricity, low carbon power sources, methane capture and energy efficiency.
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.	☑	The site has a plan showing the trajectory of greenhouse gas emissions and intensity. Group sustainability reporting data shows a reduction in both Scope 1 and Scope 2 emissions for Kumba Iron Ore sites between 2019 and 2020. Site Power BI data shows over 70 initiatives identified to reduce greenhouse gas emissions since 2017, of which 55 have been approved and 40 have been completed.
4.5.3.3.	The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies, and shall document the results of its investigations.	☑	The site's Energy and Greenhouse Gas Reduction Opportunity Review Report shows a comprehensive analysis of the site's energy consumption and greenhouse gas (GHG) emissions, and the identification of 33 Near Term and Step Change projects aimed at energy and greenhouse gas (GHG) reduction. Continual monitoring and reporting through Power BI shows greenhouse gas (GHG) reduction initiatives in the Idea, Approved and Completed stages.
4.5.4.1.	The greenhouse gas policy shall be publicly available.	☑	The Anglo American Group Climate Change Policy 2020, the Anglo American Climate Change Report 2021, and the Anglo American Climate Change: Our Plans, Policies and Progress, are available on the company's website.
4.5.4.2.	On an annual basis, the operating company or its corporate owner shall: <ul style="list-style-type: none"> a. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards mine-site-level greenhouse gas reduction targets; and efforts taken to reduce emissions from the mining project and mining-related activities; and b. Publicly report on mine-site-level or corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions. 	☑	The sustainability report does not show mine level data but does report on corporate level data and reduction measures. Site Power-BI data shows achievement and progress towards mine-site-level greenhouse gas reduction targets.

Requirement #	Requirement Text	Rating	Basis for rating
Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas			
4.6.1.1.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies.	☑	<p>Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring are carried out and documented by competent professionals using appropriate methodologies.</p> <p>Received a copy of the consultant's credentials and professional certificate as a member of the Land Rehabilitation Society of Southern Africa.</p>
4.6.1.2.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts.	☑	<p>Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans have been developed in consultation with stakeholders, including affected community. Stakeholders are consulted as part of the Environmental Impact Assessment/Environmental Management Plan public participation process.</p> <p>The Kolomela Mine concluded a successful biodiversity symposium that was attended by members of the public, persons within the Anglo American and Kumba Iron Ore group and members of various government institutions on 6 and 7 October 2021. The presentations were also shared with the invitees.</p>
4.6.1.3.	Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request.	☑	<p>Interested and affected parties received email notification of the Environmental Impact Assessment for the Kolomela Mine expansion project. It stated that a hard copy can be made available on request. Furthermore, a public meeting was held on 30 November 2021 at the Postmasburg Dutch Reform Church Community Centre.</p> <p>Representatives reported that these reports will be made available should they be requested. To date, no stakeholder requests have been made with respect to biodiversity, ecosystem services and protected areas impact assessments.</p>
4.6.2.1.	Critical 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.	☑	<p>A Biodiversity Impact Assessment (BIA) was identified as one of the specialist studies to be undertaken, as highlighted in the 2021 Kolomela Expansion Scoping Report. A biodiversity assessment was performed by EXM Advisory Services (report dated August 2021), and the report was shared electronically with Interested and Affected Parties, including municipalities, authorities, neighbors, and other affected parties.</p> <p>While most of the significant biodiversity features have already been identified, the priority ecosystem services are addressed in the Land Management Plan, which is currently being reviewed.</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>A floral field assessment was conducted as part of the Biodiversity Impact Assessment (BIA) and presents the results of the impact assessment where the impacts on floral ecology and biodiversity are discussed. In a separate study, impacts on faunal ecology and biodiversity were assessed.</p> <p>The mine has environmentally sensitive areas, but not protected areas, and is currently in the process of obtaining permits for the disturbed areas related to the expansion project. Water use licenses are available for the existing operations/ disturbed land.</p>
4.6.2.2.	<p>Screening shall include identification and documentation of:</p> <ul style="list-style-type: none"> a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas; b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values; c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. 	✔	<p>A Biodiversity Impact Assessment (BIA) was identified as one of the specialist studies to be undertaken, as highlighted in the 2021 Kolomela Expansion Scoping Report. A biodiversity assessment was performed by EXM Advisory Services (report dated August 2021).</p> <p>A Biodiversity Value Assessment (BVA) forms part of the Biodiversity Impact Assessment (BIA) and covers all requirements a to d. The Biodiversity Value Assessment (BVA) is a protocol adopted by Anglo American to enable its operations to identify, measure, manage and report on its impacts on biodiversity in a standardized, comparable, credible, and unbiased manner.</p>
4.6.3.1.	<p>When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:</p> <ul style="list-style-type: none"> a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, 	✔	<p>The mine has evidence to show they have established the baseline conditions and identified the key biodiversity areas and ecosystem services. The impacts on biodiversity and the cumulative impacts study have been completed in the BIA and Biodiversity Management Programme 2021.</p> <p>Kolomela mine developed a Biodiversity Action Plan (BAP) in 2013, which was done in accordance with corporate policy and in compliance with the requirements of the Environment Management Plan (EMP).</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;</p> <p>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;</p> <p>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and</p> <p>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services.</p>		<p>In order to comply with the minimum standards and precautionary principles, as stated in Anglo's Biodiversity Standard, all affected significant biodiversity features that have a residual impact after the application of the Mitigation Hierarchy must meet a net positive impact (NPI) outcome. This is demonstrated through biodiversity offsets and/or compensation measures, and additional conservation outcomes that are enhanced by the project's intervention. Furthermore, the mine has a conservation management plan.</p>
4.6.4.1.	<p>Critical Mitigation measures for new mines shall:</p> <p>a. Follow the mitigation hierarchy of:</p> <p>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;</p> <p>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;</p> <p>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and</p> <p>iv. As a last resort, offsetting the residual impacts.</p>	—	<p>This requirement is marked as Not Relevant because the mine is an existing mine.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> b. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process; c. Be designed and implemented to deliver at least no net loss, and preferably a net gain in important biodiversity values, and the ecological processes that support those values, on an appropriate geographic scale and in a manner that will be self-sustaining after mine closure. 		
4.6.4.2.	<p>At existing mines:</p> <ul style="list-style-type: none"> a. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement onsite restoration strategies, and also, through consultation with stakeholders, design and implement additional conservation actions to support the enhancement of important biodiversity values and/or priority ecosystem services on an appropriate geographic scale; and b. If there is the potential for new impacts on important biodiversity values or priority ecosystem services (e.g., as a result of mine expansions, etc.), the operating company shall follow the mitigation hierarchy, prioritizing the avoidance of impacts on important biodiversity values or priority ecosystem services, but where residual impacts remain, shall apply offsets commensurate to the scale of the additional (new) impacts. 	✔	<p>The mine has evidence to show they have established the baseline conditions and identified the key biodiversity areas and ecosystem services. The impacts on biodiversity and the cumulative impacts study have been completed in the Environmental Impact Assessment (EIA).</p> <p>Kolomela Mine developed a Biodiversity Action Plan (BAP) in 2013, which was done in accordance with corporate policy and in compliance with the requirements of the Environment Management Plan (EMP). The 2013 BAP is now replaced by the 2020 Biodiversity Management Program and provides guidance on the management of biodiversity aspects at the properties for biodiversity of May 2020.</p> <p>The biodiversity offsets plan for part of the Biodiversity Management Program, and these have been discussed with relevant stakeholders.</p> <p>In order to comply with the minimum standards and precautionary principles, as stated in Anglo's Biodiversity Standard, all affected significant biodiversity features that have a residual impact after the application of the Mitigation Hierarchy must meet a net positive impact (NPI) outcome. This is demonstrated through biodiversity offsets and/or compensation measures and additional conservation outcomes. Furthermore, the mine has a conversation management plan.</p>
4.6.4.3.	Offsetting, if required, shall be done in a manner that aligns with international best practice.	✔	<p>The Biodiversity Management Program consolidates existing and available biodiversity information, identifies risks, proposes mitigations, addresses residual impacts, and above all, directs the biodiversity program at Kolomela towards NPI.</p> <p>The mine follows a global approach to biodiversity management.</p> <p>The purpose of a Biodiversity Offsetting Plan (BOP) is to document and clearly communicate how the project will achieve an NPI outcome as required by the Anglo American Biodiversity Standard and comply with all requirements as stipulated by the Northern Cape Department of Environment and Nature Conservation (DENC) and relevant national legislation.</p>

Requirement #	Requirement Text	Rating	Basis for rating
			The biodiversity offsets plans form part of the Biodiversity Management Programme, and these have been discussed with relevant stakeholders.
4.6.4.4.	<p>The operating company shall develop and implement a biodiversity management plan or equivalent that:</p> <ol style="list-style-type: none"> Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services; Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time; Provides a budget and financing plan to ensure that funding is available for effective mitigation. 	⊕	<p>The Biodiversity Management Program consolidates existing and available biodiversity information, identifies risks, proposes mitigations, addresses residual impacts, and above all, directs the biodiversity program at Kolomela towards net positive impact (NPI).</p> <p>It has already been identified that a loss-gain assessment should be completed to determine the losses to affected biodiversity and the gains that will be required through biodiversity offsets to attain NPI outcomes.</p> <p>The mine has evidence to show they have established the baseline conditions and identified key biodiversity areas and ecosystem services. The impacts on biodiversity and the cumulative impacts study have been completed in the Biodiversity Impact Assessment and Biodiversity Management Program 2021. Furthermore, the mine produces a biomonitoring report to update information on baseline biodiversity conditions and provides updates on management plans based on the updated data.</p> <p>Budget is provided for biomonitoring and restoration of soil, but not for effective mitigation.</p>
4.6.4.5.	Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle.	☑	<p>Kolomela embarked on a long-term biomonitoring program starting in 2009, before the existence of Anglo American's Environmental Performance Standard for Biodiversity. The biomonitoring report is updated annually (2020 report available, pending 2021). The purpose is to manage biodiversity in all phases of their operations to achieve net positive impact.</p> <p>The plan will be updated and reviewed annually during the Management Review; however monthly meetings are conducted to ensure that execution of the plan remains on track.</p> <p>The Biodiversity Management Program consolidates existing and available biodiversity information, identifies risks, proposes mitigations, addresses residual impacts, and above all, directs the biodiversity program at Kolomela towards NPI.</p>
4.6.5.1.	An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:	☑	The Kolomela Mine is in the process of expansion, and a 2021 scoping report has been provided for review. The establishment of the project footprints will result in the removal of vegetation, which will cause impacts on biodiversity, both in terms of physical disturbance and habitat fragmentation.

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> a. Demonstrates that the proposed development in such areas is legally permitted; b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project; c. Conducts mining-related activities in a manner consistent with protected d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. 		<p>A number of specialist studies were undertaken to provide input to the EIA. Discussions with relevant stakeholders were undertaken during the public participation phase of the project.</p> <p>The scoping report was made available for a 30-day commenting period, after which the comments were incorporated, and the final scoping report was submitted to the competent authority for approval.</p> <p>The Environmental Management Program (EMPr) (as amended in 2010) for Kolomela was approved as part of the mining right application, and a subsequent EMPr was approved as part the 2017 expansion EIA process. Hereafter, it was amended again with the existing and 2021 proposed expansion activities.</p> <p>The application form to obtain environmental authorization was available for review.</p>
4.6.5.2.	<p>An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized.</p> <ul style="list-style-type: none"> • International Union for Conservation of Nature (IUCN) protected area management category IV protected areas; • Ramsar sites that are not IUCN protected area management categories I-III; and • Buffer zones of UNESCO biosphere reserves. 	☑	<p>The Kolomela Mine is in the process of expanding, and a 2021 scoping report has been provided for review. The establishment of the project footprints will result in the removal of vegetation, which will cause impacts on biodiversity, both in terms of physical disturbance and habitat fragmentation. The extent and significance of the disturbance will be assessed by an ecological impact assessment that will be undertaken as part of the specialist studies. Discussions with relevant stakeholders will be undertaken during the public participation phase of the project.</p> <p>None of the new mining areas are located within protected areas; however, they do fall within ecologically sensitive areas due to the prevalence of habitat to support species of conservation importance.</p> <p>The center of the Kolomela mining right has been classified as Critical Biodiversity Area (CBA) One. The CBA is associated with the “Welgevondenspruit” that is also classified as a National Freshwater Ecosystem Priority Area (NFEPA). It is not anticipated that the development will have a direct impact on the CBA, except for a small section of the proposed Kapsteveld waste rock dump.</p> <p>None of the areas have been declared as, International Union for Conservation of Nature (IUCN) protected area management category IV protected areas; Ramsar sites that are not IUCN protected area management categories I-III; and Buffer zones of UNESCO biosphere reserves.</p>
4.6.5.3.	<p>Critical IRMA will not certify new mines that are developed in or that adversely affect the following protected areas:</p> <ul style="list-style-type: none"> • World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; 	—	<p>This requirement is marked Not Relevant because the mine is an existing mine.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> • IUCN protected area management categories I-III; • Core areas of UNESCO biosphere reserves. 		
4.6.5.4.	<p>Critical An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:</p> <ol style="list-style-type: none"> The mine was developed prior to the area's official designation; Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized; and The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. 	—	This requirement is marked Not Relevant because the mine is not located in a protected area listed in 4.6.5.3.
4.6.6.1.	The operating company shall develop and implement a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine lifecycle.	☑	Actions and implementation of management plans associated with the protection of biodiversity are ongoing. The mine produces a biomonitoring report to update information on baseline biodiversity conditions and provides updates on management plans based on the updated data.
4.6.6.2.	Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time.	⦿	<p>None of the new mining areas are located within protected areas; however, they do fall within ecologically sensitive areas due to the prevalence of habitat to support species of conservation importance.</p> <p>The center of the Kolomela mining right has been classified as Critical Biodiversity Area (CBA) One. The CBA is associated with the "Welgevondenspruit" that is also classified as a National Freshwater Ecosystem Priority Area (NFEPA). It is not anticipated that the development will have a direct impact on the CBA, except for a small section of the proposed Kapstevl waste rock dump.</p> <p>The mine is in the process of developing a system to monitor and manage the effectiveness of mitigation strategies.</p>
4.6.6.3.	If monitoring reveals that the operating company's protected areas and/or biodiversity and ecosystem services objectives are not being achieved as	—	Based on the evidence available at the time of the audit, no monitoring activities have revealed that any protected areas or biodiversity and ecosystem services

Requirement #	Requirement Text	Rating	Basis for rating
	expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders.		objectives are not being achieved. Therefore, this requirement has been rated as Not Relevant.
4.6.6.4.	The findings of monitoring programs shall be subject to independent review.	✓	The Kolomela Biomonitoring Annual Report 2020 was compiled by Dr. PC Zietsman with Omni EKO and represents a summary of the 2020 annual reports of all the different projects with emphasis on the most recent findings. The reports included in the appendices, that were summarized in this report were prepared by other technical experts. For example, the Vegetation Monitoring on the Property of the Sishen South (Kolomela) Mine, Postmasburg (November 2020) was prepared by G.N. Smit (PhD) and G. Janse Van Rensburg (B.Sc.Agric., Hons), and the report on the Herpetofauna Diversity at Kolomela Mine as prepared by Banzai Environmental
Chapter 4.7—Cyanide Management			
	Chapter Not Relevant	—	The mining project does not use, store, produce, or transport cyanide.
Chapter 4.8—Mercury Management			
	Chapter Not Relevant	—	The mine does not use an autoclave, roaster, carbon kiln, refining furnace or other thermal process that could lead to significant emissions of mercury (from heating ores or fuels on site).

APPENDIX B–Corrective Action Plan

Chapter Number	Topic	Requirement Number	Requirement Text	Rating	Auditors feedback	Action Plan
1.2	Community and Stakeholder Engagement	1.2.2.2.	<p>The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ul style="list-style-type: none"> a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account. 	Substantially Meets	<p>The site has in place a Stakeholder Engagement Plan (SEP), which has been updated annually since 2019. The Stakeholder Engagement Plan indicates that:</p> <ul style="list-style-type: none"> a. Regular timely engagement is taking place b. Evidence reviewed showed the management and subject matter expert participation in engagement activities such as the stakeholder day. c. The Stakeholder Engagement Plan demonstrates consideration of engagement methods with different stakeholder groups, language requirements, and respect for stakeholders. For example, the quarterly environmental forum is held in Afrikaans as the surrounding farmers are predominantly Afrikaans speaking. Presentations are translated as needed. During interviews, the site confirmed that engagements are done in different languages. Booklets for Community Boxes are Setswana, Afrikaans, and English. d. Feedback on engagement outcomes indicates two-way dialog, and the Ulula community surveys demonstrate that the site is soliciting feedback from stakeholders. The site regularly solicites feedback from stakeholders through the Ulula survey and annual community perception surveys. These are provided in different languages. <p>During the stakeholder interviews, some stakeholders reported that they do not know how their feedback is incorporated into socioeconomic development planning and noted that feedback to queries or requests for support on projects or funding is not always provided or provided in a timely manner.</p>	<p>Kolomela Mine fosters two way dialogue and meaningful engagement with stakeholders in a number of ways. Kolomela Mine will look to ensure that feedback from stakeholders and the company are recorded in the minutes of meetings held to ensure that action is undertaken based on stakeholder input, and agreements in terms of point of (d) and (e) with defined timelines. These actions will be captured in our management systems action tracker module.</p>

Chapter Number	Topic	Requirement Number	Requirement Text	Rating	Auditors feedback	Action Plan
1.3	Human Rights Due Diligence	1.3.3.3.	<p>Responding to actual human rights impacts related to the mining project:</p> <p>a. If the operating company determines that it has caused an actual human rights impact, the company shall:</p> <p style="padding-left: 20px;">i. Cease or change the activity responsible for the impact; and</p> <p style="padding-left: 20px;">ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders;</p> <p>b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;</p> <p>c. If the operating company determines that it is linked to an actual human rights impact</p>	Substantially Meets	<p>The evidence provided by the Human Rights Due Diligence review is supported by the Social and Human Rights Impact and Risk Analysis review, the Social Performance Report in March 2021, the Socio-Economic Development Stakeholder Day presentation, and the letter to the local business forum, which references the use of a mediator to resolve an ongoing issue. Social Performance Report provides some examples of potential human rights impacts that the company may be contributing to (i.e., shortage of housing due to influx of job seekers and employment creation at the mine) and provides recommended mitigations. Report provides details on stakeholder engagement activities and potential grievances. Stakeholder Impact Assessment and Perception Report indicate assessment and mitigations included stakeholder consultation. Stakeholder Perception Survey indicates awareness of the Incident and Grievance process. Evidence was provided of the proposed mediated meeting between the operating company and the local business forum. Scope of Work for Human Rights Due Diligence Process update (2022) includes consultation and collaboration with stakeholder groups. Stage 2 onsite interviews did not provide an opportunity to gather additional evidence to better understand cooperation with local municipality and other groups on programs to identify and address mitigate human rights impacts, including disaster management planning.</p>	<p>Kolomela Mine will look towards improving communication around human rights risks, in line with incidents which may arise from the mine's impact. Practically, this could take the form of case studies, which detail the incident, the action taken, mitigation strategies developed and implemented, and the link towards potential human rights violations. Kolomela Mine will also, where applicable, include the mitigation measures and human right impacts identified in the Social Management Plan.</p>

Chapter Number	Topic	Requirement Number	Requirement Text	Rating	Auditors feedback	Action Plan
			<p>through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and</p> <p>d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.</p>			
2.5	Emergency Preparedness and Response	2.5.1.1.	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.	Substantially Meets	The site was unable to provide evidence that they have specifically reviewed the guidelines of the UN APELL for Mining. However, corporate and site level documentation does adequately address the guidelines and recommendations.	Kolomela Mine will update the Emergency Preparedness and Response Plan, and emergency procedures to include the suggested content or equivalents for the UN APELL for Mining.
2.6	Planning and Financing Reclamation and Closure	2.6.4.1	Financial surety instruments shall be in place for mine closure and post-closure.	Substantially Meets	<p>The mine's closure plan is updated every 3 years. The closure cost liability is updated annually and is independently reviewed by PwC annually. The closure costing has been signed off and approved by financial management, and financial guarantees are in place and have been submitted to the authorities.</p> <p>In a letter to the Regional Manager of the Department of Mineral Resources and Energy, Kumba Iron Ore Limited reported the latest estimated closure cost, the amount in a trust fund, bank guarantees and the shortfall against the estimated closure cost. The letter goes on to state that Sishen Iron Ore Company (PTY) Ltd, the holder of a mining right under which it operates Kolomela Mine, is in the process of addressing the identified shortfall</p>	Pending receipt

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					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.	
3.1	Fair Labor and Terms of Work	3.1.2.1	The operating company shall respect the rights of workers to freedom of association and collective bargaining.	Substantially Meets	Code of Conduct, Recognition Agreements, Contingency Operations Division Agreement, Shop Steward Procedural Agreement, Induction Training screenshot, Grievance Procedure and dispute form provided. Interviews with managers and employees confirm respect by the operating company for the rights of workers to collectively bargain. Interviews with contracted workers indicate that suppliers may strongly discourage the exercise of workers' right to freedom of association.	Pending receipt
3.1	Fair Labor and Terms of Work	3.1.3.3	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	Substantially Meets	Evidence provided demonstrates policies and implementation of robust training to prevent and address harassment, intimidation and/or exploitation, especially with regards to women. Grievance mechanism and form for registering a dispute provided. Interviews with workers and mine management confirm awareness of how harassment complaints can be lodged and the process for addressing them. However, interviews with workers also suggest more measures and attention are needed to ensure employees and contractors are comfortable using multiple grievance platforms available. Interviews with several workers and work groups raised the potential for safety concerns or other grievances not being brought forward due to relational or communication weaknesses within their respective work environments. In the second half of 2022 the site rolled out Gender Based Violence workshops for all levels of the organization. All shift employees and straight shift employees were covered.	Pending receipt

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					<p>In second half of 2022 the Woman in Mining committee was re-instated/established. A campaign was launched to create awareness of the functions of the committee. The committee provides also voice for women that might not feel comfortable to speak out in the normal forums.</p> <p>An awareness campaign is currently running on site television screens at the entrance to the mine. The campaign is intended to make people aware of the Your Voice platform where you can raise sensitive cases, including Victimization/harassment. Your Voice is currently addressed in ' Digging Deeper', the mine's newspaper.</p> <p>On the 26th of January 2023 a presentation on psychological safety was made to management, this included the updated Bully, Harassment and Victimization policy and launch of a 'Living with the Dignity Hub'. Plant shift employees have now been exposed to the same presentation. Contract workers have not yet been addressed.</p> <p>A digital platform called 'Engage app', which was developed for Covid, is installed on all employees and contractors' cellphones. The App includes the Psychological Safety Header where all the policies and how to report, on any safety, harassment etc. matter, is available.</p> <p>The site's next step will be to recommunicate to all contractors the Bullying, Harassment, and Victimization Policy and Psychological Safety, a campaign will then be launched, and a competition will be run. This is all aimed at encouraging all employees to take part in 'Getting to know more about Kolomela's stance of speaking up for everyone. (Bully, Harassment and Victimization and Living with Dignity Hub process)".</p> <p>As contractors had not yet been covered during the visit to the mine in April 2023, it</p>	

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					was deemed not necessary to conduct interviews with contractors at that time.	
3.1	Fair Labor and Terms of Work Requirements	3.1.3.3.	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	Substantially Meets	<p>Evidence provided demonstrates policies and implementation of robust training to prevent and address harassment, intimidation and/or exploitation, especially with regards to women. Grievance mechanism and form for registering a dispute provided. Interviews with workers and mine management confirm awareness of how harassment complaints can be lodged and the process for addressing them. However, interviews with workers also suggest more measures and attention are needed to ensure employees and contractors are comfortable using multiple grievance platforms available. Interviews with several workers and work groups raised the potential for safety concerns or other grievances not being brought forward due to relational or communication weaknesses within their respective work environments.</p> <p>In the second half of 2022 the site rolled out Gender Based Violence workshops for all levels of the organization. All shift employees and straight shift employees were covered. In second half of 2022 the Woman in Mining committee was re-instated/established. A campaign was launched to create awareness of the functions of the committee. The committee provides also voice for women that might not feel comfortable to speak out in the normal forums.</p> <p>An awareness campaign is currently running on site television screens at the entrance to the mine. The campaign is intended to make people aware of the Your Voice platform where you can raise sensitive cases, including Victimization/harassment. Your Voice is currently addressed in ' Digging Deeper', the mine's newspaper.</p> <p>On the 26th of January 2023 a presentation on psychological safety was made to</p>	<p>Kolomela Mine will communicate the Group Policies on Bullying, Harassment & Victimization, Human Rights Policy, Group Inclusion and Diversity Policy and the Living with Dignity Hub. Kumba will aim to roll-out training on Sexual Harassment Procedures, Bullying, Harassment & Victimization Policies, Human Rights Policy, Grievance Management in the Workplace, and Gender Based Violence to show attendance of employees across departments to indicate that the company has taken measures to prevent harassment, intimidation, and/or exploitation, especially in regard to female workers.</p>

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					<p>management, this included the updated Bully, Harassment and Victimization policy and launch of a 'Living with the Dignity Hub'. Plant shift employees have now been exposed to the same presentation. Contract workers have not yet been addressed.</p> <p>A digital platform called 'Engage app', which was developed for Covid, is installed on all employees and contractors' cellphones. The App includes the Psychological Safety Header where all the policies and how to report, on any safety, harassment etc. matter, is available.</p> <p>The site's next step will be to recommunicate to all contractors the Bullying, Harassment, and Victimization Policy and Psychological Safety, a campaign will then be launched, and a competition will be run. This is all aimed at encouraging all employees to take part in 'Getting to know more about Kolomela's stance of speaking up for everyone. (Bully, Harassment and Victimization and Living with Dignity Hub process)".</p> <p>As contractors had not yet been covered during the visit to the mine in April 2023, it was deemed not necessary to conduct interviews with contractors at that time.</p>	
3.1	Fair Labor and Terms of Work Requirements	3.1.5.1.	<p>The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <p>a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;</p>	Substantially Meets	<p>Interviews with workers and management indicate there are functioning grievance mechanism in place, which includes an appropriate level of management to address concerns promptly, transparency and timely feedback, anonymity, and allowance for worker representatives. Grievance and disciplinary procedures do not impede other judicial or administrative remedies.</p>	<p>Kolomela Mine has a grievance procedure in place and we will continue working on increasing confidence in the mechanisms in place for all workers and business partners. Further work to create awareness on contractors employees to various platforms where complaints can be lodged will be done. Specific actions taken may include: training records on the grievance complaint reporting process, the inclusion of Living with Dignity Hub</p>

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			<p>b. Shall allow for anonymous complaints to be raised and addressed;</p> <p>c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and</p> <p>d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</p>			<p>process into employee induction, posters indicating how employees can report on the Engage App, for a different channel than email for accessibility purposes.</p>
3.2	Occupational Health and Safety	3.2.4.1.	<p>The operating company shall implement measures to protect the safety and health of workers including:</p> <p>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;</p> <p>b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;</p> <p>c. Providing workers who have suffered from an injury or illness at the workplace with first aid,</p>	Substantially Meets	<p>The site's Operational Risk Management Program (ORMP) establishes how workers are to be informed of the hazards, health risks and preventative and protective measures associated with their work. However, the site tour identified that job risk assessments were not made available to workers in all instances. Subsequent documentation reviewed showed that the site during the months of January, February and March 2023 issued 48 and 34 Job Risk Assessments (JRA's) for High-Risk Work (HRW) and 46 and 32 Work Execution Documents (WED's). In March 33 Job Risk Assessments (JRA's) for High-Risk Work (HRW) and 33 Work Execution Documents (WED's). The site had no corresponding information for the months of July - December 2022.</p> <p>The site has established a detailed personal protective equipment (PPE) specification, procedure and standard and auditors confirmed through discussions with works and contractors that PPE is provided and maintained at no cost to workers. However,</p>	<p>Kolomela 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:</p> <ul style="list-style-type: none"> - Updating Governance and training documentation, - Monitoring and measuring the number of Visible Felt Leadership hours in the field, to ensure adequate oversight of work being undertaken. - Review the Procedure for Personal Protective Equipment o ensure that employees understand the dangers with their work, and the pertinent to preventative measures which are (a) at no cost, and (d) PPE training is provided at no cost.

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			<p>and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;</p> <p>d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;</p> <p>e. Providing adequate supervision and control on each shift; and</p> <p>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</p>		<p>respirator fit testing is currently not a part of this program, and no subsequent documentation was submitted to prove that specific training is being conducted on the fitment of respirators. It is important to note that this is not a requirement under South Africa law, but it is a requirement in other countries and generally regarded as a preferred health and safety practice.</p> <p>While onsite, tours were conducted of the Emergency Response and Occupational Health & Safety facilities available to all employees, and contracted services for advanced patient transport were confirmed. Health and safety training programs were sampled and reviewed. Adequate supervision of workers was generally observed. However, required supervision was found not to be in place during a particular instance of hazardous work, observed during the site tour. At the time of the follow-up audit no evidence could be found that an investigation was conducted and that any corrective actions were taken.</p> <p>During the Stage 2 follow-up assessment, Additional evidence was reviewed by the audit team. The evidence provided shows that the mine has a process in place for managing High Risk Work and has communicated the requirements for managing High Risk Work to its workers. On 23 March 2022 an internal Section 54 (Mine Health and Safety Act), form #11400 was issued, identifying, and confirming the issues observed by the audit team. Following this, an investigation and recommunication of the JRA to relevant employees was given and the Section 54 was uplifted on 25 March 2022. Corrective actions identified included the Section Manager to ensure that all high-risk work are supervised and that existing JRA for the isolation and</p>	

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					lockout is re-communicated to employees. Actions were assigned and tracked in the organization's corrective action tracking system. Additional preventative actions were identified and included review of the high-risk work procedure, recommunication of high-risk work procedure to all employees and the digitization of WEDs and job cards to prevent tasks being executed without WEDs..	
4.1	Waste and Materials Management	4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).	Substantially Meets	All considerations made during the design of the Tailings Storage Facility (TSF) and associated Waste Rock Dumps are stipulated in the Tailings Storage Facility (TSF) Final Design Report, March 2010. The design approach subscribes to best practice principles and represents a second-generation Tailings Storage Facility (TSF) design. Although other options have been considered for the other waste facilities, it could not clearly be established that the best available technologies (BAT) and best available/applicable practices (BAP) were specifically looked at	Kolomela Mine has implemented the Group-Level standard for Mineral Residue Facilities and Water Management Structure Standard which indicates that the mine is implementing the standard for the design and mitigation of risks at site level. By 2025, Kolomela Mine will be expected to comply with the Global Industry Standard on Tailings Management (GISTM) which is considered to be as the best available practice (BAP) and best available technology (BAT) to design and mitigate risks associated with tailings facilities. With regard to other waste facilities, an internal investigation and gap analysis against BAT and BAP for these facilities will be undertaken
4.2	Water Management	4.2.4.4.	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	Substantially Meets	At the time of the Stage 2 assessment, the Kumba (Head office) Adaptive Water Management Standard had not been finalized, which was identified as a gap by the audit team. During the Stage 2 follow-up assessment, the audit team reviewed the additional information provided. The evidence reviewed included the "Kumba Iron Ore Adaptive Water Management Standard" and the "Kolomela Mine Adaptive Water	Kolomela Mine has developed an Adaptive Water Management Plan aligned with the Kumba Adaptive Water Management Standard. The plan will be updated annually. Specific actions to address the finding include: - Annual review of the

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			<p>groundwater quality and quantity related to the mining project; and</p> <p>b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.</p>		<p>Management Plan", which establishes two environmental objectives, and general trigger levels and actions. The trigger levels reference Site-Specific-Trigger-Values (SSTVs). The "Integrated Water and Waste Management Plan" is referenced by the Adaptive Water Management Plan and includes information such as monitoring locations. Additional supporting documentation was presented to the audit team, explaining the relationship between the Kolomela Adaptive Water Management Plan, the Kumba Adaptive Water Management Standard, and the Integrated Water and Waste Management Plan. Collectively these plans outline adaptive management actions to mitigate impacts on current and future uses of 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>	<p>effectiveness of the water management measures in preventing negative changes in the two water quality objectives established in the plan.</p>

References

StatsSA, 2011, Statistics South Africa, 2011 Census.

SLR, 2016, Environmental Impact Assessment Report and Environmental Management Programme Report
Kolomela Mine Amendment: Expansion of Activities at Kolomela Mine.