Mogalakwena Audit Packet

March 2024

IRMA

Initiative for Responsible Mining Assurance

Contents

(click to jump)

Press Release

Questions & Answers

IRMA Process Backgrounder

Audit Report

© Initiative for Responsible Mining Assurance 2025

Anglo American's Mogalakwena PGM mine completes IRMA audit

South African complex achieves IRMA 50 when audited against the world's only equally governed mining standard

13 March 2025 – Today the Initiative for Responsible Mining Assurance (IRMA) released the audit report of Anglo American's Mogalakwena PGM complex against the IRMA Standard for Responsible Mining. Independent audit firm ERM-CVS assessed Mogalakwena at IRMA 50 when measuring its performance against the Standard's best practice social and environmental criteria.

IRMA 50 means that ERM-CVS verified that the operations at least substantially met all 40 critical requirements of the IRMA Standard, as well as at least 50% 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 Mogalakwena audit page 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 steps in a deepening dialogue between mining companies and those affected by their operations. Because the process is still evolving, the results should be reviewed and interpreted accordingly.

"An increasing number of community members and workers are engaging in IRMA audits, and they're using the audit reports to communicate directly with the mining company about their priorities for improvement," ***Ms. Boulanger said.*** "If readers find results inconsistent with their experience, we encourage them to share their perspectives with IRMA and the company so that we can improve the audit review process and support continuing improvement at the site—as community members and NGOs have already done in this case."

"We are always looking to improve not only mining practices, but also IRMA's system. IRMA's improvements, and being transparent about how we need to improve, is built into our system and a measure of its success," *said* ***Ms. Boulanger.***

Craig Miller, CEO of Anglo American Platinum said, "This milestone at Mogalakwena is significant in our overall adoption of IRMA. It enables us to promote transparency and best practice in sustainability, while adding value to our global customers by helping them meet the increasing expectations for responsibly mined materials in an efficient and credible way. With IRMA 50, we have accomplished our sustainable mining plan target of having all our mining operations assured against a recognised responsible mining standard by 2025."

Including Mogalakwena, 23 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).

For More Information:

- Aimee Boulanger, Executive Director, +1.301.202.1445, contact@responsiblemining.net

- Mogalakwena audit packet: https://responsiblemining.net/mogalakwena-packet
- Mogalakwena IRMA audit page: https://responsiblemining.net/mogalakwena

March 2025

Questions & Answers

IRMA audit of Anglo American's Mogalakwena PGM operation

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

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

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

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

What does IRMA 50 mean?

Mogalakwena achieved IRMA 50 which means it has been independently audited and has achieved an average score of at least 50% when measured against the requirements within each of the four principle areas of the IRMA Standard—business integrity, positive legacies, and social and environmental responsibility. A mine receiving IRMA 50 must also at least substantially meet all of IRMA's critical requirements.

A mine that receives a recognition of achievement in the IRMA system is also required to publicly shared its audit scores and the basis for auditors' findings for all relevant requirements. By sharing such extensive information, a mine provides diverse stakeholders with the information needed to understand the mine's operations and encourage improvement as needed.

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

The information in this audit report represents the work of an independent 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 active encouragement of workers and community members to participate in the audit.

Auditors review thousands of pages of documents shared by the company, spend a week or more on site of the mining operation, and speak with workers, community members and Indigenous rights holders without the company present. Auditors consider the feedback from workers and stakeholders alongside evidence provided by the site to enable a balanced perspective of the mine's performance. Auditors consider this collective information to help determine a rating for each requirement. Their rationale is documented, including a reference to the evidence that was considered. Approximately half of IRMA's requirements include an expectation of the auditors to seek additional perspectives from workers, community members and others on a site's performance.

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 communication increases with the people who are potentially most impacted by their operations. Mining's customers and investors create also add market value that create incentive for best practices.

Does an IRMA audit mean a mine is "safe"?

An IRMA audit does not declare 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 as they engage with the mining company on areas for improvement that are most important to them.

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.

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

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 create greater risk for us?

Trust is deeply broken between many mining companies and the stakeholders, community members 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.

Many stakeholders, community members 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 approved firms are aware of some stakeholders' deep distrust of audit processes. This can happen when "independent audits" are actually consulting work done by experts hired to serve a particular company. IRMA audits are different from these types of consulting contracts in several ways.

To date, IRMA has approved, trained, and works closely with three firms (applications for new firms to join are always 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, community members 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 strict requirements associated with maintaining impartiality and managing conflict of interest. Audit firms cannot provide consulting or internal auditing services to a site being audited, they must have systems to assess and mitigate risks to impartiality and must conduct an internal review of

the audit methodology and report by someone not involved in the audit to verify compliance. Accredited audit firms are trained by IRMA, assessed annually by an external accreditation body, and also by an independent oversight body that specifically considers expectations for the IRMA assurance process. Audit firms that fail to properly manage and preserve impartiality could lose their accreditation and therefore their license to operate.

Why would a mining company agree to do a rigorous audit like IRMA?

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 specific improvements and supporting better relationships with communities, customers and investors.

How can Indigenous Peoples, community members and other stakeholders use this report?

Indigenous Peoples, community members, NGOs, workers and other stakeholders can use the audit findings to engage directly with the Mogalakwena Mine.

An IRMA audit report is a tool that helps increase access to information about the impacts of a mining operation. It assists rights-holders by putting them on a more equal information footing when engaging with an operator directly, or in public.

The findings of an IRMA audit report can internationally amplify the voices of rights-holders that participated in the audit. The findings of an audit report provide data on a company's practices that can be cross-referenced with other sources of information by interested stakeholders including metals purchasers.

IRMA is the only voluntary mining standard in the world actively reaching out to potentially impacted communities to encourage them to use the IRMA system as a tool to drive more responsible business practices, and to train and support them on how to do this.

What is the significance of the community complaints filed about the Mogalakwena audit?

In September and November 2024, two complaints were filed, by a regional NGO – Bench Marks Foundation and 31 residents of Sekuruwe, a directly affected community.

The complainants raise concern with the integrity of the Mogalakwena audit process, including insufficient notice provided to communities prior to the onsite portion of the audit which limited their ability to provide input to auditors. Through the IRMA audit process, there is a platform for direct communication between Anglo American, Bench Marks Foundation, and the community signatories to increase dialogue and understanding of community concerns.

The complaints are being addressed through IRMA's Issues Resolution Procedure. You can access them and their status on the Complaints tab of the IRMA Mogalakwena audit page: responsiblemining.net/mogalakwena.

You may file your own complaint at: responsiblemining.net/complaints

Complaints are a critically important part of the IRMA system. They ensure that all voices are heard in the process, making for more robust understanding of the complex issues associated with mining. IRMA uses these complaints to improve the system and provide transparency about how the system continues to evolve to create value for all.

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 and considering the opportunity and value to strengthen laws using the IRMA Standard as a template.

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 minerals for their products or in which they invest. We

encourage purchasers and investors to look beyond an IRMA achievement level and take an in-depth look at audit reports to understand the scores and performance for each chapter. IRMA reports can provide significant insights into a broader effort of due diligence to understand risks in the supply chain and support mining's customers and investors to be active participants in reducing potential impacts.

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, community members, and Indigenous rights holders.

In terms of specific sourcing claims, IRMA has a new Chain of Custody Standard (responsiblemining.net/coc) which provides a way to independently audit a purchaser's supply chain and ensure claims of responsible sourcing can be verified.

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

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

IRMA's intention is to increase direct dialogue and information sharing between mining companies and diverse stakeholders and Indigenous rights holders affected by the operations.

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 using the information below.

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

07

For more information

IRMA Mogalakwena audit page:
https://responsiblemining.net/mogalakwena

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

IRMA Initiative for Responsible Mining Assurance

MINE SITE ASSESSMENT PUBLIC SUMMARY REPORT

MINE SITE

Mogalakwena Complex

OPERATING COMPANY

Anglo American

COUNTRY OF OPERATION

South Africa

13 MARCH 2025

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 Mogalakwena Complex mine and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

Table of Contents

Acknowledgements....2
Table of Contents....3
Audit Details....5
1. Mine Site Overview....7
1.1. Overview of Location....7
1.2. Overview of Operation....9
1.2.1. Scope of activities and facilities included in audit....9
2. Mine Site Assessment Process....11
2.1. Overview of IRMA Process....11
2.1.1. Scope and Limitation of Audits....12
2.1.2. IRMA Complaints Process....13
2.2. Audit Process and Timeline....13
2.3. Stakeholder Engagement....14
2.3.1. Written comments/inquiries....15
2.3.2. Mine Staff....17
2.3.3. Workers/Contractors....19
2.3.4. Government Agencies....21
2.3.5. Participating Communities and NGOs....22
2.4. Summary of Mine Facilities Visited....26
3. Summary of Findings....28
3.1. Audit outcome....28
3.2 Scores by IRMA Standard principle and chapter....28
3.3. Performance on critical requirements....30
3.3.1. Snapshot of performance on 40 critical requirements....30
3.3.2. Performance on 40 critical requirements....31
4. Next Steps....34
4.1 Corrective Action Plans....34
4.2 Disclosure of Summary Audit Report....34
4.3 Timing of Future Audits....34
APPENDIX A–Results by Requirement....36
Principle 1: Business Integrity....36
Chapter 1.1—Legal Compliance....36
Chapter 1.2—Community and Stakeholder Engagement....43
Chapter 1.3—Human Rights Due Diligence....53

Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy 63
Chapter 1.5—Revenue and Payments Transparency 70
Principle 2: Planning for Positive Legacies 76
Chapter 2.1—Environmental and Social Impact Assessment and Management 77
Chapter 2.2—Free, Prior and Informed Consent (FPIC) 88
Chapter 2.3—Obtaining Community Support and Delivering Benefits 89
Chapter 2.4A—Resettlement 94
Chapter 2.4B—Resettlement 115
Chapter 2.5—Emergency Preparedness and Response 136
Chapter 2.6—Planning and Financing Reclamation and Closure 142
Principle 3: Social Responsibility 155
Chapter 3.1—Fair Labor and Terms of Work 155
Chapter 3.2—Occupational Health and Safety 172
Chapter 3.3—Community Health and Safety 191
Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas 200
Chapter 3.5—Security Arrangements 208
Chapter 3.6—Artisanal and Small-Scale Mining 217
Chapter 3.7—Cultural Heritage 220
Principle 4: Environmental Responsibility 229
Chapter 4.1—Waste and Materials Management 229
Chapter 4.2—Water Management 251
Chapter 4.3—Air Quality 262
Chapter 4.4—Noise and Vibration 271
Chapter 4.5—Greenhouse Gas Emissions 276
Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas 279
Chapter 4.7—Cyanide Management 290
Chapter 4.8—Mercury Management 290
Appendix B – Corrective Action Plans 291
Endnotes 322

Audit Details

Name of Mine:	Mogalakwena Complex
Operating Company:	Anglo American Platinum Limited (AAP) – Mogalakwena Mine
Mine Owner:	Anglo American Platinum Limited
Country of Operation:	South Africa
Mined Material(s):	Platinum Group Metals (PGMs) i.e., Platinum, Palladium, Rhodium, Iridium, Ruthenium, Gold, with Nickel and Copper as associated base metals.
# Employees / contractors:	Approximately 2,486 employees and 7,405 contractors at the time of audit
IRMA audit webpage	https://responsiblemining.net/mogalakwena
Audit Type:	Initial IRMA Verification Audit
Audit Dates:	Stage 1: 11– 15 September 2023 Stage 2: 28 November 2023 – 5 December 2023 Follow-up Assessment: 29 – 31 October 2024
Audit firm:	ERM CVS
Audit Team (includes type of auditor and # of auditors per subject area):	Lead Auditor (1) Social Auditors (2) Environmental, Health, and Safety Auditors (2) Support team members (3)
Audit Firm Declaration:	✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers and stakeholders) as presented during the Stage 1 and Stage 2 audit activities. ✓ The audit team members were deemed to have no conflicts of interest with the mine. ✓ The audit team members were professional, ethical, objective and truthful in their conduct of audit activities. ✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.
Scope of Audit	Mining and processing operations at Mogalakwena Mine including five open pits (Sandsloot, Zwartfontein, Mogalakwena South, Mogalakwena North and Mogalakwena Central); two concentrators (Mogalakwena North Concentrator, Mogalakwena South Concentrator); two tailings storage facilities (Blinkwater, Vaalkop [Vaalkop #1 and Vaalkop #2]) and associated infrastructure); waste rock dumps; maintenance and fueling facilities; and various waste management areas on site.

IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
IRMA Achievement Level:	IRMA 50
Achievement Decision Date:	13 March 2025
Authorized Representative:	Will Huggett, IRMA Program Manager
Representative Signature:	
IRMA Reference Number:	IRMA-STD-ERM-001-V-3448.IRMA1

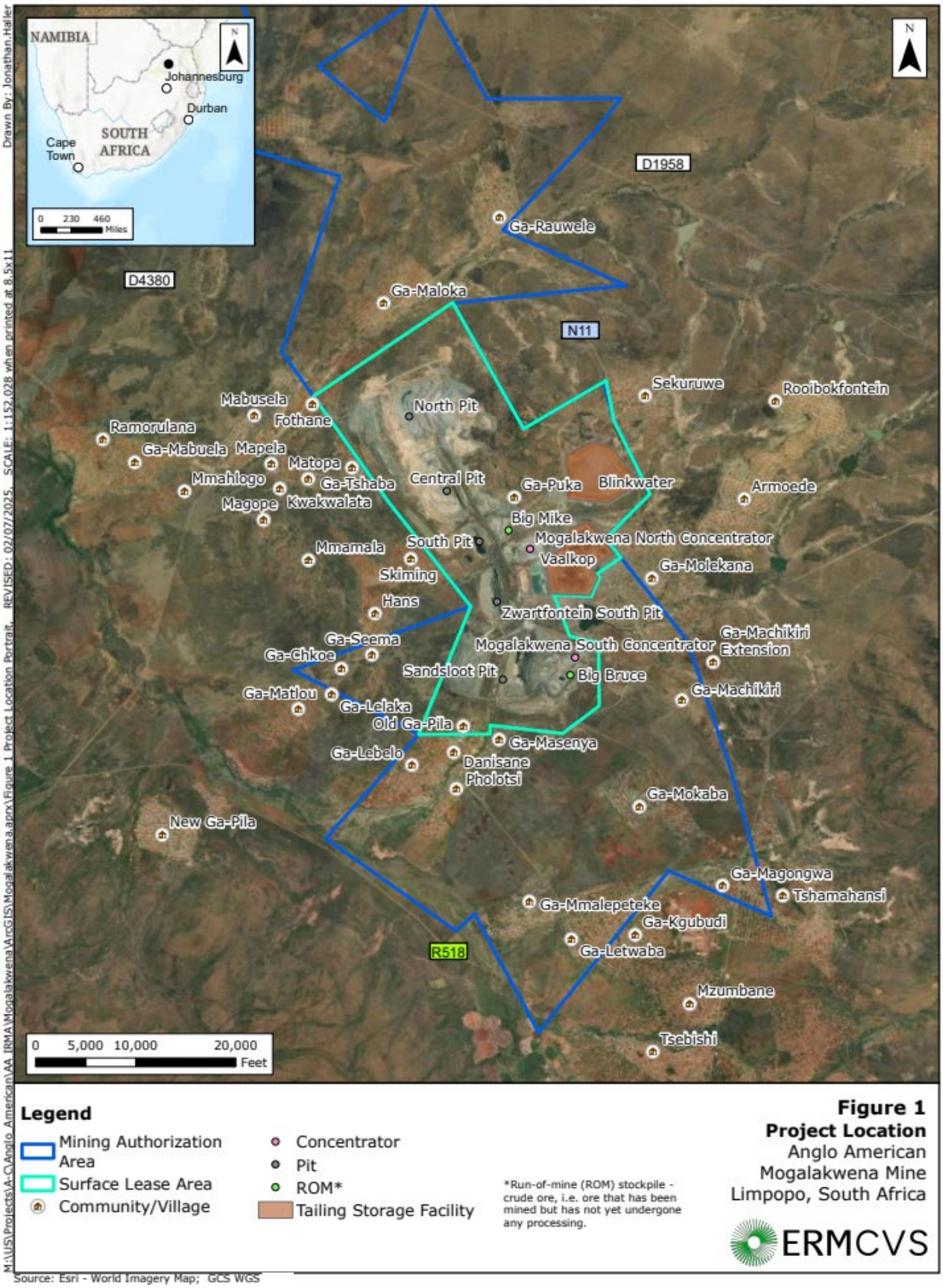
1. Mine Site Overview

1.1. Overview of Location

Mogalakwena Complex is located in the Mogalakwena local municipality in the western quadrant of the Limpopo Province. Limpopo is the northernmost South African province, lined by Zimbabwe to the north; Mozambique to the east; the provinces of Mpumalanga, Gauteng, and Northwest to the south; and Botswana to the west and northwest. [1]

The mine is predominantly situated on land owned by the Mapela Traditional Authority. It is located approximately 25km east of the Waterberg Biosphere Reserve, one of the biggest conservation areas in the country which serves as a water reservoir for the region.[2] Six natural reserves are found within 30km of the mine. A World Heritage Site, Makapansgat, site for paleo-anthropological discoveries, is also located in the municipality.[3]

Mogalakwena local municipality is predominantly rural, with local communities relying on subsistence farming for their livelihoods. There are 42 rural villages within a 50km zone of influence of the mine, 23 of which (called 'doorstep communities') are located between 100m and 5km of mine infrastructure or sensitive receptors. The closest major town is Mokopane, approximately 25km southeast of the mine, with a population of roughly 30,150 (2011)[4].


Drawn By: Jonathan.Haller
M:\US\Projects\A-C\Anglo American\AA IRMA\Mogalakwena\ArcGIS\Mogalakwena.aprx\Figure 1 Project Location Portrait, REVISED: 02/07/2025, SCALE: 1:152,028 when printed at 8.5x11
NAMIBIA
Johannesburg
Durban
SOUTH AFRICA
Cape Town
0 230 460 Miles
N
D1958
D4380
N11
R518
Ga-Rauwele
Ga-Maloka
Mabusela
Fothane
Ramorulana
Ga-Mabuela
Mapela
Matopa
Mmahlogo
Ga-Tshaba
Magope
Kwakwalata
North Pit
Central Pit
Ga-Puka
Blinkwater
Sekuruwe
Rooibokfontein
Armoede
Big Mike
Mogalakwena North Concentrator
Vaalkop
South Pit
Mmamala
Skiming
Ga-Molekana
Hans
Zwartfontein South Pit
Ga-Seema
Ga-Chkoe
Mogalakwena South Concentrator
Ga-Machikiri Extension
Sandsloot Pit
Big Bruce
Ga-Machikiri
Ga-Matlou
Ga-Lelaka
Old Ga-Pila
Ga-Masenya
Ga-Lebelo
Danisane
Pholotsi
Ga-Mokaba
New Ga-Pila
Ga-Magongwa
Tshamahansi
Ga-Mmalepeteke
Ga-Kgubudi
Ga-Letwaba
Mzumbane
Tsebishi
0 5,000 10,000 20,000 Feet
Legend
Mining Authorization Area
Surface Lease Area
Community/Village
Concentrator
Pit
ROM*
Tailing Storage Facility
*Run-of-mine (ROM) stockpile - crude ore, i.e. ore that has been mined but has not yet undergone any processing.
Figure 1
Project Location
Anglo American
Mogalakwena Mine
Limpopo, South Africa
ERMCVS
Source: Esri - World Imagery Map; GCS WGS

1.2. Overview of Operation

The Mogalakwena Mine Complex is the largest open pit platinum mine in the world. Established in 1993, the mine is 100% owned by Anglo American Platinum (AAP) Limited Rustenburg Platinum Mines (RPM).

The ore body is mined by open pit methods. Material is extracted in vertical benches by drilling, blasting, loading and hauling. Material is moved by means of truck and shovel to the primary processing (crushing) plants, stockpiles, and waste rock dumps along a network of constructed surface roadways.

Mogalakwena Mine 's life of mine (LoM) extends well beyond 2080 and could potentially continue for a further period of some 100 years. [5]

Current mining areas comprise five open pits: Sandsloot, Zwartfontein, Mogalakwena South, Mogalakwena North and Mogalakwena Central. Two pits (Mogalakwena Central and Zwartfontein) are currently active. Three pits will be merged into one super pit (i.e., North Pit, Central Pit and South Pit), while one of the remaining open pits, Zwartfontein Pit, has one last pushback planned. No further pushbacks will take place at the Sandsloot Pit. Additional pits are planned in the near future at Mogalakwena Mine. Pit depths vary from 30m to 280m. Open pit mining could ultimately be supplemented by underground mining, with initial access via decline shafts under development in the footwall of the Sandsloot Pit.

Ore is milled on-mine at the Mogalakwena North Concentrator (MNC) and the Mogalakwena South Concentrator (MSC). Multiple waste rock dumps, top soil and subsoil dumps, and ore stockpiles are situated at various locations on the mine. [6]

Mogalakwena Mine has two tailings storage facilities (TSFs) and associated return water ponds (RWP): Vaalkop, which comprises two contiguous structures: Vaalkop 1 and Vaalkop 2 (out of service) and Blinkwater (currently in use).

1.2.1. Scope of activities and facilities included in audit

Included in the audit scope are:

Mining operations:

- Five open pits (Sandsloot, Zwartfontein, Mogalakwena South, Mogalakwena North and Mogalakwena Central)

- Administration buildings

Processing operations:

- Two concentrators (Mogalakwena North Concentrator, Mogalakwena South Concentrator)
- Two tailings storage facilities (Blinkwater, Vaalkop [Vaalkop #1 and Vaalkop #2]) and associated infrastructure)
- Waste rock dumps
- Maintenance and fueling facilities, including a POCS area (surface mobile equipment and diesel filling station)
- Workshops
- Various waste management areas on site, including general waste landfill, waste salvage yards and waste collection points

2. Mine Site Assessment Process

2.1. Overview of IRMA Process

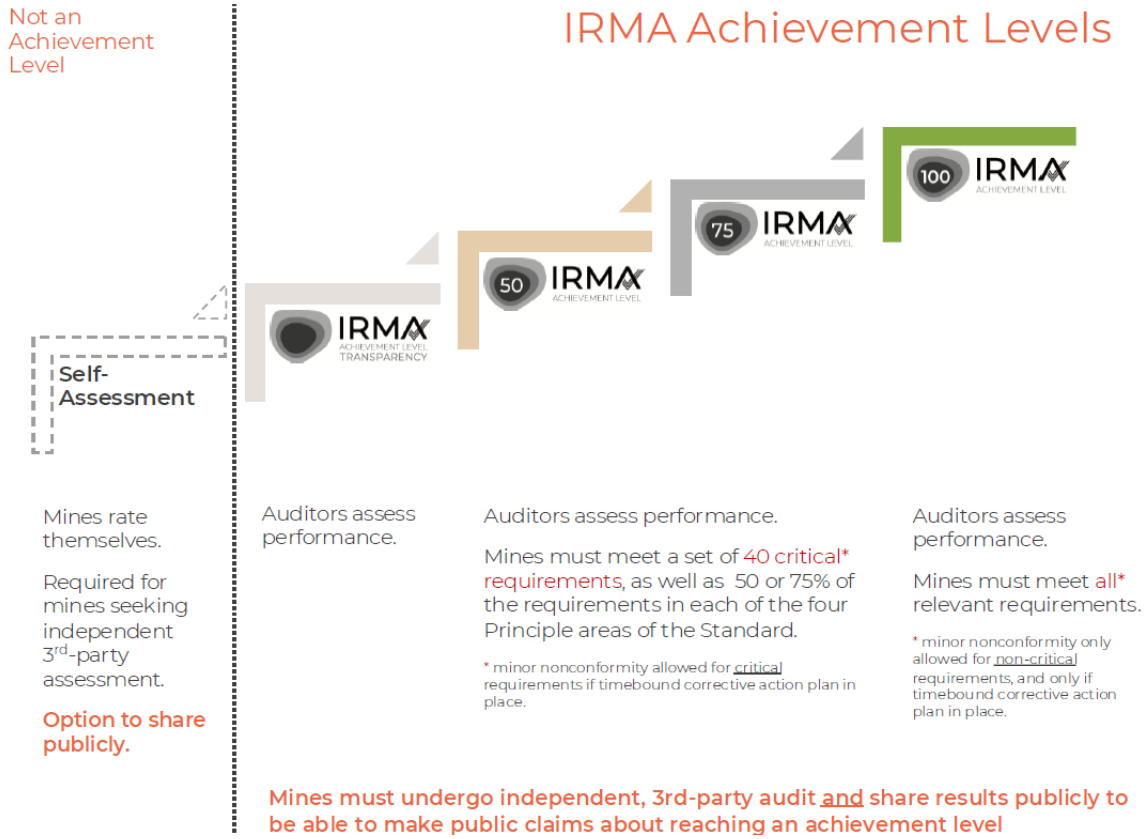
The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).[7] When the self-assessment has been completed, the independent, third-party assessment may begin.

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

Based on observations, interviews and information evaluated during Stage 1 and Stage 2, auditors determine if mines are fully, substantially, partially or not meeting all 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 website. [8]



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.[9]

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).[10] 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 so by visiting the IRMA website.[11] Details on the complaints process can be found in IRMA's Issues Resolution Procedure.[12]

2.2. Audit Process and Timeline

- Mogalakwena completed the initial self-assessment for Mogalakwena on 31 July 2023.
- ERM CVS carried out an initial Stage 1 desktop audit between 11 September – 15 September 2023.
- ERM CVS conducted a Stage 2 on-site audit between 28 November – 5 December 2023.
- Mogalakwena 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 29 October – 31 October 2024 to verify Mogalakwena's corrective actions and supplement external engagement conducted during the Stage 2 audit.

The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs), governmental agencies, documentation review and visit to operational areas including areas around tailings located at the former Mothlotlo community and the surrounding communities.

2.3. Stakeholder Engagement

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

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 submit written comments about the environmental and social performance of the Mogalakwena Mine to participate in the assessment. Further, ERM CVS prepared a similar announcement in Sepedi that was distributed via email to representatives in the surrounding communities and posted on the ERM CVS website. Community representative contact details were obtained from the Mogalakwena stakeholder database. Mogalakwena 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.

Stakeholder engagement during the follow-up assessment in October 2024 was conducted to supplement the Stage 2 engagement undertaken in 2023 and strengthen the basis of the audit findings by expanding the scope of engagement where the audit team had previously encountered limited participation. During the follow-up assessment, a social auditor, supported by an engagement specialist with relevant local language skills, held virtual and in-person interviews with members of a national South African non-governmental organization (NGO), and representatives of the Mogalakwena Local Municipality, including the mayor, a ward councilor, Chief Financial Officer and Communications Director. A separate interview was conducted with the local municipality's Manager of Disaster Management and her staff. The team also visited and met with the operational manager of a local health clinic servicing mine workers, their families and members of the Mapela community, as well as coordinators of a drop-in center for youth in the area outside of Mokopone. An interview with a representative of a local NGO building environmental awareness in surrounding villages was held. Sessions also included individual interviews with the South African Police Service station commander of the Mahwelereng detachment, and regional and circuit managers of the Department of Education. Facilitated by the national NGO mentioned, a meeting was held with traditional authority leaders and members of the Skimming community. An additional meeting with

community representatives of Sekuruwe did not occur. Further contact was made with the community's leadership but an invitation by the audit team for a follow-up virtual meeting was not accepted. During the corrective action follow-up audit, the social audit team spoke with the Provincial Manager and representatives of the South African Human Rights Commission at their offices in Polokwane, Limpopo.

2.3.1. Written comments/inquiries

ERM CVS received requests for meetings from five stakeholders prior to or during the Stage 2 audit period. ERM CVS communicated back to stakeholders and received confirmation of meetings from three stakeholders. Two of these meetings were held in person during the IRMA Stage 2 audit and one meeting was held virtually via Microsoft Teams.

Complaints #IRMA-2024-004 and #IRMA-2024-005

On the 3rd of September 2024, prior to the corrective action follow-up audit, a complaint was received by IRMA from the Bench Marks Foundation, a national South African NGO, identifying limitations in community participation during the Stage 2 audit in 2023. The correspondence highlighted how stakeholders and affected or interested parties, in particular community members with limited literacy or without Internet access may not have been aware of the Mogalakwena Stage 2 audit or the options available to them to participate in the audit process. Attachments that accompanied this complaint also included correspondence sent to Mogalakwena regarding concerns expressed by the Skimming and Sekuruwe communities with respect to dust, tailings facilities, emergency planning and related Global Industry Standard on Tailings Management (GISTM) consultations with the communities. Details of this complaint can be accessed on the IRMA website, listed as #IRMA-2024-004.[13]

In response to this inquiry, on 17th September 2024, the ERM CVS social audit team reached out to the Bench Marks Foundation to offer any affected or interested party to participate in additional stakeholder engagement during the verification audit period.

Subsequently, the Bench Marks Foundation shared contact details of the Skimming community members affected by the Mogalakwena mining operations. A meeting with representatives from the Skimming community was held during the corrective action follow-up audit on 30 October 2024.

This complaint prompted a continual improvement discussion at IRMA and ERM CVS on ways to enhance the pre-audit announcement and stakeholder engagement processes to reach stakeholders with limited literacy or without Internet access. The strengthening of relationships with local and national groups also better ensures that announcements and communications about future IRMA audits will reach an expanded group of potential community participants.

On the 23rd of October 2024, the Bench Marks Foundation requested additional stakeholder engagement with the Sekuruwe community impacted by the Mogalakwena tailings facility. This meeting was proposed to be held on the 30th of October 2024 but did not occur based on a raised security concern and miscommunication between the audit team and the Mine.

On the 1st of November 2024, members of the Sekuruwe Community and Mapela Executive Committee with support from the Bench Marks Foundation submitted a second complaint to express disappointment that the planned meeting with Sekuruwe community representatives did not occur and questioned the impartiality of the IRMA process given that auditors were provided transportation and security support by the Mine during the on-site audit process. Details of this complaint can be accessed on the IRMA website, listed as #IRMA-2024-005.[14]

ERM CVS recognizes that accepting Mine transportation and security for auditors could be perceived by community members and other stakeholders as not demonstrating the full independence of the IRMA audit process. However, this arrangement has been considered mandatory by participating IRMA auditees in South Africa, citing their responsibilities for ensuring the audit team's safety and security during Stage 2, based on their local knowledge of security risks. Auditors wear visible badges to distinguish themselves as members of the independent audit team.

Alternative transportation offered by the Bench Marks Foundation was considered, but could not be accepted at the time as the audit team was operating in accordance with arrangements with the Mine and ERM CVS travel and health and safety policies.

Efforts to reschedule the community meeting were unsuccessful, as the auditors and community were unable to agree to a suitable time and format in the limited time available during and shortly after the site visits.

Subsequently, an agreement was made to incorporate written comments from correspondence that accompanied complaint #IRMA-2024-004 into the IRMA Mogalakwena Initial report (this report). These comments included community grievances regarding unsatisfactory consultation and transparency, and failure to address grievances related to the relocation of the Skimming community, Seritarita High School, and the expansion of Blinkwater tailings storage facility.

Plans will be made to include the engagement and participation of Sekuruwe community representatives during the surveillance audit stakeholder engagement process. The Mine's response to these concerns and impact on relevant chapter requirements will be reviewed during the future surveillance audit.

2.3.2. Mine Staff

The following 61 individuals were interviewed as subject matter experts (SMEs) on 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
Responsible Mining (IRMA) Program Manager
Sustainable Mine Planning and Integration Specialist
IRMA Specialist
Manager Social Performance Planning
Community Relations & Local government Specialist
Community Relations & Local government Specialist
Land Access Displacement and Resettlement Coordinator
ESG & Carbon Disclosure Principal
Sustainability Relations Principal
Senior Manager: Social Risk and Impact Information Management and Analytics
Corporate Affairs Principal
Manager Grievance and Incidents Management
Socio-Economic Development Manager
Social Labour Plan Specialist
Contractor Management Specialist

Section Manager Communication Operations
HR Coordinator Transformation
Project Manager: Socio-Economic Development
Operational Inclusive Procurement Advisor
Mogalakwena Zimele Hub Manager
Social Performance Specialist
Resettlement Improvement Manager
Community Relations Manager
Cultural Heritage Principal
Environmental Superintendent
Verification Superintendent
Permitting Manager
Verification Officer
Environmental Officer
Government Relations Specialist / Acting Human Rights Principal
Grievance Management Officer
Grievance Management Officer
Senior Commercial Specialist
Commercial Manager
Senior Finance Manager
Community Relations Officer
Emergency and First Aid Service Officer
Safety & Sustainable Development (SSD) Management Systems, Assurance & Learning from Incidents (LFI) Principal
Community Relations Officer
Occupational Hygienist
Occupational Hygienist
Manager Safety, Health and Environmental
Operational Risk Management Superintendent
Social Performance Principal
Specialist support (Resilience Environmental)
Impact Monitoring & Evaluation Specialist
Environmental Officer
Senior Engineer Mineral Residue Facility
Resident Engineer

Environmental Officer
Environmental Coordinator
Engineering Specialist Production
Engineering Specialist Production
ESG Programme Manager (Energy & Water)
Energy & Projects Reporting Analyst
Head of Electrical Automation & Energy
Environmental Coordinator
Principal Environmental Biodiversity & Rehabilitation
Environmental Officer
Environmental Officer
General Manager Corporate Affairs and Sustainable Impact

2.3.3. Workers/Contractors

During the Stage 2 assessment, ERM CVS conducted 53 scheduled worker engagements, including 26 individual interviews and 8 group interviews or focus groups (two to five people) with employees and contractors. 23 women and 30 men were interviewed (see Table 2 below). ERM CVS selected workers to interview, and once interviewees were selected, Anglo American assisted with logistics to ensure that workers were available for interviews at the requested times and that the interview location was accessible to workers at the scheduled time of the interview. Interviews included employees and contractors from several different departments selected to represent different age groups; genders; years of experience; work groups, job classifications, and operational, administrative, health care or union responsibilities. Topics discussed included terms of employment and working conditions, with specific attention on the treatment of 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. Elected shop steward representatives of the same affiliated union active at the site were interviewed together. Workers interviewed were informed that the interviews were voluntary and at no time did the interviewees request union representation to be present during interview sessions.

Scheduled worker interviews were supplemented by additional impromptu interviews with individuals or groups in various mine work sites during the environmental, health, and safety portion of the audit process.

The sample of interviewed workers includes a wide range of jobs (both blue-collar and white-collar workers), groups of workers with various length of work experience (from several months to 20 years), large proportion of contractors' workers (68% of the total amount of the interviewed workers were employed by contractors), vulnerable groups (32% of the total amount of the interviewed workers were women, also several employees under the age of 25 years old were interviewed, including a pregnant contracted worker).

Table 2. Workers Interviews

Date	Meeting Type	Number of Attendees	Female/ Male
28 Nov 2023	Group Worker Interview	4	3 F, 1 M
28 Nov 2023	Individual Worker Interview	1	1 M
28 Nov 2023	Individual Worker Interview	1	1 F
28 Nov 2023	Group Worker Interview	3	3 F
28 Nov 2023	Group Worker Interview	5	2 F 3 M
29 Nov 2023	Individual Worker Interview	1	1 M
29 Nov 2023	Individual Worker Interview	1	1 M
29 Nov 2023	Group Worker Interview	2	2 M
29 Nov 2023	Individual Worker Interview	1	1 F
29 Nov 2023	Individual Worker Interview	1	1 F
29 Nov 2023	Individual Worker Interview	1	1 M
29 Nov 2023	Individual Worker Interview	1	1 M
29 Nov 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Group Worker Interview	4	3 F, 1 M
04 Dec 2023	Group Worker Interview	5	5 M
04 Dec 2023	Group Worker Interview	2	2 M
04 Dec 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Individual Worker Interview	1	1 F
04 Dec 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Individual Worker Interview	1	1 M
04 Dec 2023	Individual Worker Interview	1	1 M

05 Dec 2023	Individual Worker Interview	1	1 F
05 Dec 2023	Individual Worker Interview	1	1 M
05 Dec 2023	Individual Worker Interview	1	1 M
05 Dec 2023	Individual Worker Interview	1	1 F
05 Dec 2023	Individual Worker Interview	1	1 F
05 Dec 2023	Individual Worker Interview	1	1 F
05 Dec 2023	Individual Worker Interview	1	1 M
05 Dec 2023	Group Worker Interview	2	2 F
05 Dec 2023	Individual Worker Interview	1	1 F
05 Dec 2023	Individual Worker Interview	1	1 F
Total		**53**	**23 F** **30 M**

2.3.4. Government Agencies

Stage 2 Government Agencies Interviews

On 5 December 2023, ERM CVS conducted an interview with representatives of the Mokopane Municipality identified as having authority over or a relationship with Mogalakwena. In particular, the Municipal Manager and Mayor were interviewed. The interview was conducted in the Mokopane Municipality office (located in Mokopane community) without Mogalakwena mining personnel present.

Follow-up Assessment Government Agencies Interviews

During the follow-up assessment in October 2024 the social audit team supplemented its engagement with government agencies through a meeting with the mayor of the Local Municipality of Mogalakwena. The mayor was accompanied by a ward councilor, the Chief Financial Officer and the Director of Communications. The meeting was held in the local municipality's council chambers. Mine staff did not participate in the interview. However, prior to commencement of the interview the mayor requested the session be video taped, for internal purposes. Separate interviews were held with Mogalakwena Local Municipality Manager of Disaster Management. The social team also interviewed the station commander of the local South African Police Service Mahwelereng detachment.

A session was held with the regional and relevant circuit managers of the Department of Education. The team also met with the operational manager of the Mapela Clinic. An interview with a representative of the Department of

Mineral Petroleum Resources was requested but could not be arranged prior to or during the assessment period. While constitutionally independent from other government agencies, an interview was also held with the Provincial Manager and staff of the South African Human Rights Commission at his offices in Polokwane.

Table 3. Follow-up Assessment Government Agencies Interviews

Date	Government Agencies	Location	Total Attendees
29 Oct 2024	Mogalakwena Local Municipality Mayor, Ward Councilor, Chief Financial Officer, Director of Communications	Mokopane	4
29 Oct 2024	Mogalakwena Local Municipality Manager of Disaster Management	Mokopane	2
30 Oct 2024	Station Commander, South African Police Service Mahwelereng detachment	Mokopane Area	1
31 Oct 2024	South Africa Human Rights Commission, Provincial Manager, staff	Polokwane	3
31 Oct 2024	Department of Education Regional and Circuit Managers	Mokopane Area	5
31 Oct 2024	Mapela Clinic, Operational Manager	Mapela	1
Total			**16**

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 the Mogalakwena mine social performance team and other department managers, and reviewed the stakeholder database provided by the site. Prior to the on-site audit, ERM CVS social auditors corresponded with site managers and held virtual conferences to better understand the site's community relations and issues being encountered.

Stage 2 Participating Communities and NGOs Interviews

During the Stage 2 audit, Mogalakwena provided an orientation vehicle tour of the area surrounding the mine, including informal settlements and projects that had been supported by the mine. During the Stage 2 audit, ERM CVS conducted community meetings with several communities near the mine or those with the potential to be impacted by the mine. The communities were selected based on social audit team 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. Transport and security to meeting sites was provided by Mogalakwena.

Meetings were held in the locations identified below and varied in size with one to four community representatives, to discussions with more than five participants. Communication and organization of the meetings was facilitated by Mogalakwena mining personnel but were conducted by ERM CVS auditors without Mogalakwena mining personnel present.

Table 4. Stage 2 Interviews with the Representatives of Local Communities and NGOs

Date	Community, NGO Name	Location	Total Attendees	Gender
29 Nov 23	Stakeholders Affected by Resettlement	Mothlotlo	2	1 F 1 M
29 Nov 23	Stakeholders Affected by Grave Relocation and Resettlement	Ga-Puka	6	2 F 4 M
29 Nov 23	Stakeholders Affected by Resettlement - Extension 14	Mokopane, Extension 14	5	5 F
29 Nov 23	Stakeholders Affected by Resettlement	Mothlotlo	2	1 F 1 M
30 Nov 23	Mapela Tribal Council	Mapela Tribal Council	3	3 M
30 Nov 23	Bakenberg Traditional Authority	Mokopane	3	1 F 2 M
30 Nov 23	Mokopane Traditional Authority	Mokopane	5	2 F 3 M

Date	Community, NGO Name	Location	Total Attendees	Gender
30 Nov 23	Community Forum Leaders	Mokopane Tribal Council venue	7	3 F 4 M
01 Dec 23	Stakeholders Affected by Grave Relocation	Ga-Puka	3	1 F 2 M
01 Dec 23	Representatives of Youth (Sandsloot-Mabusela)	Mapela Tribal Council	6	3 F 3 M
01 Dec 23	Women in Business	Mapela	3	3 F
01 Dec 23	Mashashane Traditional Authority and Mashashane – Local Accountability Forum member	Mashashane	5	1 F 4 M
01 Dec 23	Stakeholders Affected by Grave Relocation and Resettlement	Rooibok	5	3 F 2 M
01 Dec 23	Representatives of the Accountability Forum	Mokopane	2	1 F 1 M
01 Dec 23	Stakeholders Affected by Resettlement	Mashashane	3	2 F 1 M
01 Dec 23	Representatives of Vulnerable Groups	Mapela	9	4 F 5 M
04 Dec 23	FUNDZA Training Centre	Mokopane	1	1 F
04 Dec 23	A le Tuke Drop-in Center	Mokopane	2	2 F
04 Dec 23	Community Project – Unit 7	Ga-Machikiri	3	2 F 1 M
04 Dec 23	Phaladingoe Technical High School	Mashahleng	1	1 F
04 Dec 23	Pholotsi Local Community Development (Sandsloot-Mabusela)	Mapela Tribal Council	4	2 F 2 M
04 Dec 23	Mokopane Traditional Authority	Mokopane	3	3 M

Date	Community, NGO Name	Location	Total Attendees	Gender
05 Dec 23	Mokopane Municipality (Municipal Manager and Mayor)	Mokopane	2	2 M
Total			**85**	**42 F** **43 M**

Follow-up Assessment Participating Communities and NGOs Interviews

Prior to the follow-up assessment in October 2024 social audit team members held a virtual meeting with a national NGO. During the assessment, interviews included sessions with the coordinators of a children's drop-in center in the Mokopane area, and the founder and director of a local environmental awareness organization. The audit team also held a meeting with leaders and community members in the Skimming area related to resettlement planning for a future Mine expansion.

An additional related meeting with community representatives in the village of Sekuruwe did not occur. ERM CVS has included comments from the Sekuruwe community received in correspondence referenced above in section 2.3.1. Plans will be made to include Sekuruwe community representative participation during surveillance audit stakeholder engagement process.

Table 5. Follow-up assessment Interviews with the Representatives of Local Communities and NGOs

Date	Community, NGO Name	Location	Total Attendees	Gender
30 Oct 2024	Skimming Community Leaders / Members (including the Bench Marks Foundation facilitation)	Skimming	20	12 M 8 F
30 Oct 2024	A le Tuke Drop-in Centre	Mokopane	2	2F
29 Oct 2024	Enviro Vita	Mokopane	1	1 M
28 Oct 2024	Bench Marks Foundation	Virtual	3	3 M

Date	Community, NGO Name	Location	Total Attendees	Gender
Total			26	16 M 10 F

2.4. Summary of Mine Facilities Visited

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

Operational areas	Pits: Sandsloot, Central, and Zwartfontein. Concentrators: Mogalakwena North Concentrator, Mogalakwena South Concentrator Waste rock dumps: Various TSF: Blinkwater (& associated return water facilities) TSF: Vaalkop #1 and #2 (and associated infrastructure) Workshops: Heavy equipment shop, Komatsu shop Heavy equipment fueling areas Waste Salvage Yards and other waste collection points around the mine General Waste Landfill Sample of ground and surface water monitoring localities POCS area (surface mobile equipment and diesel filling station) Administration buildings Re-vegetated tailings dam walls (improving stability)
Operational areas not visited	Pits: Mogalakwena South, Mogalakwena North and Mogalakwena Central
Other areas visited	Areas around tailings located at the former Mothlotlo community

Surrounding Communities	Mokopane Town, Mahwelereng, Mokopane extension 14, Moshate MTC, Magope, Skimming, Molekane Village, Rooibok Village, Mashashane, former Mothlotlo village (Ga-Puka), Mapela, Mashahleng, Ga-Machikiri, Mashashane

3. Summary of Findings

Detailed audit findings on a requirement-by-requirement basis can be found in Appendix 1.

3.1. Audit outcome

The site is recognized as having achieved the level of IRMA 50 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

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 1: Business Integrity		81	116	70%
Chapter 1.1—Legal Compliance	Yes	12.5	14	89%
Chapter 1.2—Community and Stakeholder Engagement	Yes	21	30	70%
Chapter 1.3—Human Rights Due Diligence	Yes	16	30	53%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	14.5	22	66%
Chapter 1.5—Revenue and Payments Transparency	Yes	17	20	85%
Principle 2: Planning for Positive Legacies		152.5	200	76%
Chapter 2.1—Env/Soc Impact Assessment and Management	Yes	48.5	58	84%
Chapter 2.2—Free, Prior and Informed Consent	No	Not Relevant	Not Relevant	Not Relevant
Chapter 2.3—Community Support and Benefits	Yes	11.5	14	82%
Chapter 2.4A—Resettlement**	Yes	11	16	69%
Chapter 2.4B—Resettlement	Yes	36.5	50	73%
Chapter 2.5—Emergency Preparedness and Response	Yes	7.5	10	75%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	37.5	52	72%

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 3: Social Responsibility		**168.5**	**204**	**83%**
Chapter 3.1—Fair Labor and Terms of Work	Yes	53.5	68	79%
Chapter 3.2—Occupational Health and Safety	Yes	35	46	76%
Chapter 3.3—Community Health and Safety	Yes	18	22	82%
Chapter 3.4—Conflict-Affected and High-Risk Areas	Yes	6	6	100%
Chapter 3.5—Security Arrangements	Yes	26.5	28	95%
Chapter 3.6—Artisanal and Small-Scale Mining	Yes	8.5	10	85%
Chapter 3.7—Cultural Heritage	Yes	21	24	88%
Principle 4: Environmental Responsibility		**119.5**	**158**	**76%**
Chapter 4.1—Waste and Materials Management	Yes	41	54	76%
Chapter 4.2—Water Management	Yes	19	36	53%
Chapter 4.3—Air Quality	Yes	17	18	94%
Chapter 4.4—Noise and Vibration	Yes	10.5	12	88%
Chapter 4.5—Greenhouse Gas Emissions	Yes	13	14	93%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	19	24	79%
Chapter 4.7—Cyanide Management	No	Not Relevant	Not Relevant	Not Relevant
Chapter 4.8—Mercury Management	No	Not Relevant	Not Relevant	Not Relevant

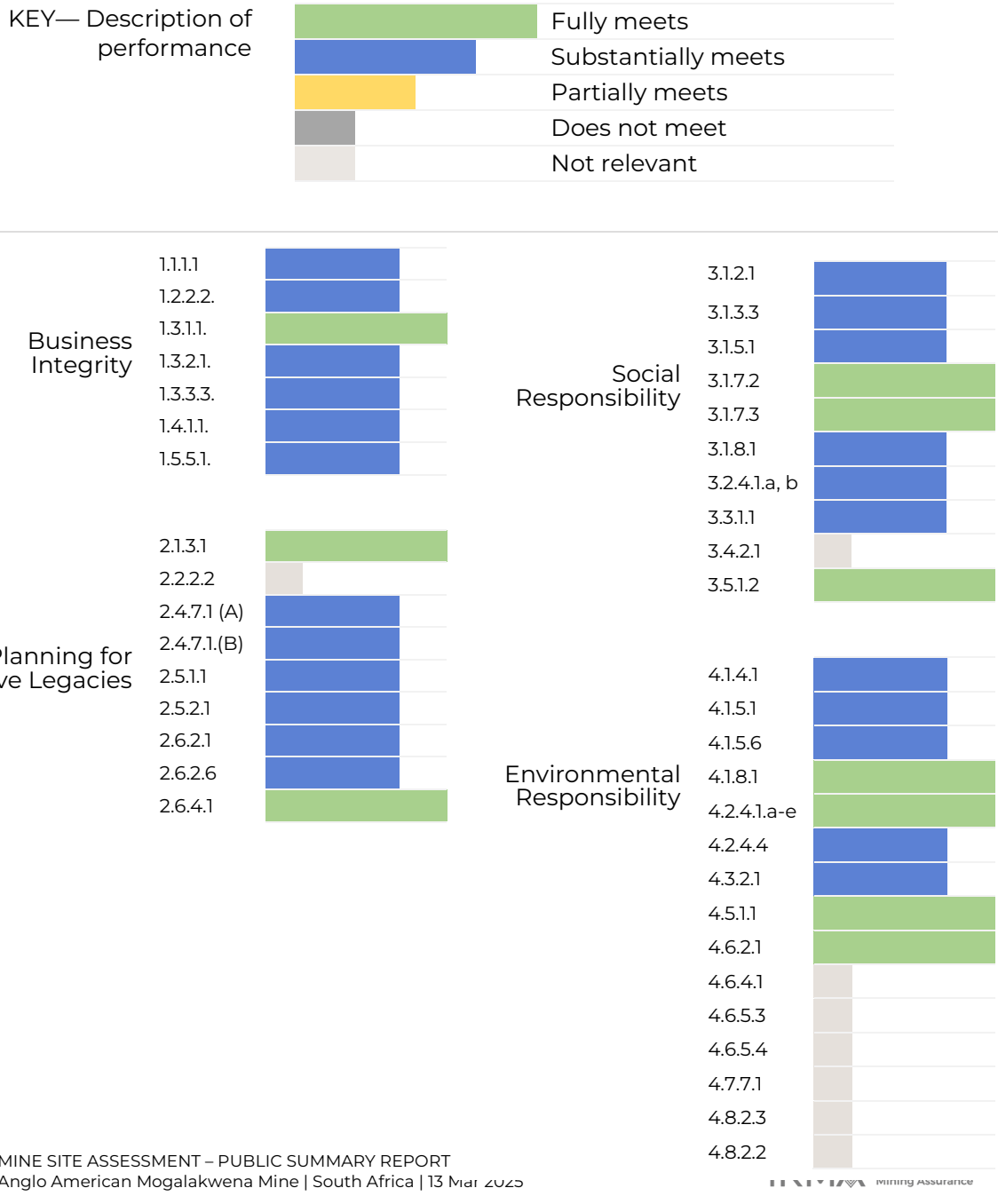
* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials 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 IRMA 100 must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

3.3.1. Snapshot of performance on 40 critical requirements



3.3.2. Performance on 40 critical requirements.

RATING LEGEND Description of performance	
●	Fully meets
◕	Substantially meets
◑	Partially meets
⊗	Does not meet
—	Not relevant

Principle 1: Business Integrity

1.1.1.1	The operating company shall comply with all applicable host country laws in relation to the mining project.	◕
1.2.2.2.	The mine fosters two-way dialogue and meaningful engagement with stakeholders	◕
1.3.1.1.	The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights.	●
1.3.2.1.	and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships.	◕
1.3.3.3.	The operating company is taking steps to remediate any known impacts on human rights caused by the mine.	◕
1.4.1.1.	Stakeholders have access to operational-level mechanisms that allow 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. (A)	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. (as it relates to older, completed resettlements as described in Chapter 2.4A).	◕

2.4.7.1.(B)	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 (as it relates to more recent resettlements as described in Chapter 2.4B).	
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 allow 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 Mogalakwena mine prepared a Corrective Action Plan to address major non-conformities with critical and other requirements. ERM CVS conducted a follow-up assessment to verify the implementation of corrective actions to improve performance against the Critical Requirements in October 2024. The findings of the follow-up assessment are included in this Report.

Following the Stage 2 follow-up assessment, Mogalakwena has updated the Corrective Action Plan to address additional performance areas. 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.

Mogalakwena Mine's public audit report will be posted on the IRMA web site. Mogalakwena will work with IRMA to make a coordinated press release with the Stage 2 audit result.

4.3 Timing of Future Audits

Typically, surveillance audits take place one year to 18 months after the initial audit (or recertification audit) is completed and the audit report finalized.

As the mine is seeking to use a corrective action period to address their nonconformities, an audit to verify their corrective actions will be scheduled within 12 months or the Stage 2 audit.

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. Mogalakwena'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

Chapter 1.1—Legal Compliance		Basis for rating
1.1.1.1.	**Critical** The operating company shall comply with all applicable host country laws in relation to the mining project.	Anglo American Platinum Mogalakwena Mine strives to comply to host country laws. Compliance to South African legislation is demonstrated by undertaking safety, health, and environmental external and internal legal compliance audits. Where non-compliance to host country laws is identified, actions are generated and those are tracked through the Isometrix system, which is an environmental health and safety management system for the management and tracking of environmental, health and safety compliance-related actions, including actions generated from internal and external audits and visits by the regulator.

The mine has appointed a service provider (as part of the legal register subscription) to provide an overview of applicable legislation with which the mine is required to comply. The last environmental health and safety compliance audit was undertaken in February 2023.

An external audit was undertaken by Anderson Attorney's in June 2022. The purpose of the Baseline Permitting Review and Compliance Audit in respect of third-party contractors is to ensure that each of the operations' third-party contractors are in possession of the permits, licenses and/or exemptions that are legally required for the services that they provide to the respective operations and that the third-party contractors comply with the conditions provided for in the permits, licenses and/or exemptions.

The only external compliance assessment was undertaken by Libryo in February 2023 which covered environment, health, and safety legal compliance across the Mogalakwena operation. The findings raised in the compliance reports are assigned and actioned through Isometrix.

In December 2022, the mine was issued a non-compliance notice from the regulator whereby an action plan was developed, and the assigned personnel are managing their respective actions with regular engagement and progress reports to the regulator.

During the on-site assessment, non-compliant hazardous waste management practices were observed in the salvage yard and the Potgietersrus Open Cast Section area. These included (not limited to), inadequate separation of hazardous and general waste streams, open hazardous waste drums, hydrocarbon contamination on bare ground, and full to near overflowing waste skips.

Since the Stage 2 on site assessment, the site has implemented several actions to address the concerns noted at Stage 2 and assist in the management of waste across the various collection points as well as across the Salvage Yard. Some actions verified on site include (but not limited to):

			- Improved segregation of the different waste streams generated on site. - Purchasing of additional general waste collection skips - Timeous collection of waste streams to prevent waste skips from overflowing - Additional concrete base has been established which will assist in the management and prevention of contamination - Lidded skips have been procured to ensure that hazardous waste is kept covered and prevents rainwater ingress. - added concrete pads under many waste skips, upgraded skips (leaks corrected), added covers, etc. Management of general and hazardous waste requires on-going actions, and site has implemented processes to ensure continuity and sustained improvement in the management of the waste storage and collection points. The site has future plans for upgrades which include additional impervious pads, drainage channels and sumps. These plans will be implemented once the required Capital Expenditure is applied for and approved. .
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	—	No IRMA requirements were found to conflict with the host country laws.

	requirement to the extent feasible without violating the law.		
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.		Non-compliances have occurred, and the regulator (National Department of Water and Sanitation) has issued a pre-directive notice (December 2022) due to the mine engaging in activities without the appropriate authorization and undertaking activities that are likely to cause pollution. Action plans have been developed with the relevant personnel assigned the respective actions in Isometrix (electronic management system) with regular engagement and progress updates to the regulator.
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.		Contractor compliance is demonstrated through audits and assessments undertaken by the Mogalakwena teams on the various contractors. Examples include contractor safety file inspection and weekly communication meeting minutes. As part of the onboarding process, contractors are provided with Anglo American Group and Mogalakwena's contractor management policies. Large scale, reputable contractors have demonstrated compliance to South African law, in part to some IRMA requirements. Interviews with workers indicate there is virtually no union membership by contracted workers employed by business partners (making up approximately 80% of the site's workforce). Interviews with workers suggest business partners and suppliers may not favor unionization, with some contracted workers also indicating the perception that expressing an interest in joining a union could result in their termination from contracted employment. Some workers also indicated that they were employed without a signed contract in place. At the time of the Stage 2 assessment, it could not be verified if the South African Constitution's protection of the right to freedom of association was respected by business partners, or the Group Responsible Sourcing Standard for Suppliers (Section 3.5) was being fully implemented.

			Since the Stage 2 assessment and based on the findings above from on-site confidential interviews regarding the general absence of unionization of contracted workers in the Mine's overall workforce, the Site implemented a third-party analysis of contracted companies that found approximately 80% compliance with freedom to associate requirements of the Group Responsible Sourcing Standard. Mogalakwena has requested South Africa Department of Labour audits on a quarterly basis to verify compliance with national law and constitutional requirements. The employee and contracted worker induction presentation has been updated to emphasize the rights of workers to freely associate. Refresher sessions will be held with workers every 18 months. Awareness sessions have been and will be held with business partners and managers. Mogalakwena reports receiving an inquiry from a business partner on the process for establishing an agreement with a union. Shop Steward onboarding has been updated. A Visible Felt Leadership campaign has been implemented to highlight, among other topics, the rights of workers to freely associate. Procurement Department managers will also receive training with respect to contract requirements and freedom of association. Over the long-term, the Site intends to make improvements to its Contractor Social Management process.
1.1.5.1.	The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard.		The site makes use of Isometrix, an integrated management system that helps manage actions to demonstrate compliance and non-compliance. No mechanism has been developed to compare compliance to IRMA requirements with South African legislation.
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 and non-compliance records, and investigations records, were available and provided to the auditor/s for review.

	compliance events and ongoing and final investigations, allegations, discussions, and final remedies.		
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.	●	No stakeholder requests regarding compliance issues have been made, but the company would provide such information to stakeholders if and when requested. The site's Safety, Health and Environment (SHE) Policy is being used as a mechanism for Stakeholders to request pertinent information specific to the mine's activities and associated compliance obligations. External environmental audits for all the valid environmental authorizations are undertaken. Regulation 34 of the 2014 Environmental Impact Assessment Regulations require that an environmental authorization (including similar authorizations in terms of specific environmental management acts), environmental management programs and closure plans (where applicable) must be audited by an independent party with relevant environmental auditing expertise, and the environmental audit report must be submitted to the Department of Environmental Affairs. The frequency of auditing is indicated in the environmental authorization. Should no intervals of auditing be indicated, the frequency of the audits may not exceed 5 years. These audit reports are published for public review in terms of Regulations 34(6)(a)(b) on the company website. Any other reports or specific requests will be made available to public enquirers upon request. The frequency of auditing is indicated in the environmental authorization. Should no intervals of auditing be indicated, the frequency of the audits may not exceed 5 years.

1.1.5.4.	Where the operating company claims that records or documentation contains confidential business information, it shall: a. Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and b. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information.	●	Confidential information is classified as 'company information where inappropriate and untimely disclosure could adversely affect Anglo American, its employees, shareholders, business partners and/or brand, and loss of public trust and confidence': - Information that has a high value to competitors. - Information that could weaken the negotiating position of Anglo American. - Information that shall be considered interesting to the media. - All personal data information (as defined by local legislation), except for business contact details such as business email addresses and business telephone numbers. Examples of confidential information include: - Litigations, acquisitions and valuations, business, or investment strategy. - Supplier demand forecasts. - Contracts / negotiation plans. - Documents or communications containing personal data (as defined by local legislation), such as remuneration details or passport numbers.

Chapter 1.2—Community and Stakeholder Engagement			Basis for rating
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.		The operation has undertaken identification and analysis of the range of groups and individuals who may be affected by the project (reflected in the stakeholder engagement plan), including identification of the vulnerable groups (vulnerable stakeholders analysis matrix). The stakeholder engagement plan includes stakeholder analysis. Stakeholders register and the vulnerable stakeholders’ analysis matrix also include analysis of groups of stakeholders potentially affected by the project.
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.		A stakeholder engagement plan scaled to the mining project’s risks and impacts was developed. The Stakeholder Engagement Plan includes an overview of the socio-economic baseline, an overview of grievances received, and issues raised, and a conflict study summary. This provides a basis for understanding projects risks and impacts, and relevant objectives for engagement. The social engagement plan is being implemented (Isometrix Action Logs - 2023, Isometrix Stakeholder Records track actions implemented). The Stakeholder Engagement Plan includes an implementation plan for each year. The list of actions is updated annually, and the stakeholder engagement plan is updated annually. The stakeholder action plan is developed annually, and the stakeholder engagement plan is updated as necessary.
1.2.1.3.	The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally		The mine engages communities to receive feedback on the engagement processes.

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).	Current stakeholder engagement activities are not fully accessible and inclusive. Not all groups of stakeholders are aware of the engagement objectives and activities, and not all groups of stakeholders are involved in the engagement process. On-site interviews during the Stage 2 audit and follow-up indicated that some community leaders and groups that may be impacted by future expansion of mining activities (i.e. Skimming) were not engaged. Some materials are not accessible to all stakeholders because of the language differences, and because they don't fully understand the purpose of the engagement. It should be noted though that verbal engagement is performed in the local language. The mine is making efforts to remove barriers for engagement for some vulnerable groups; meeting notes from meetings with various vulnerable groups are provided (youth, disabled people, women). A vulnerable stakeholders analysis matrix was undertaken to guide engagement. The vulnerability study identified vulnerable groups according to potential economic, social, human physical and nature capital vulnerability. The Stakeholder Engagement Plan includes a description of the approach to engagement with vulnerable groups, as well as engagement planning in consideration of conflict. There is an existing procedure in place guiding the way to dress when engaging with traditional authorities and councils. Also, there are trained officials within the company who know how to engage different vulnerable groups. For traditional authority, hard copies are provided for some materials and posted on the walls. Information is also provided in local newspapers and on radio channels. In summary, there are some existing barriers to engagement. The mine has identified these barriers but has not been able to remove all these barriers to engagement.

1.2.1.4.	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.		Conflict analysis was developed aiming to understand community dynamics. Also, the social and human rights impact and risk analysis is regularly developed and updated for the activities related to the Mogalakwena mine, that identifies need for engagement. The stakeholder engagement plan includes considerations of the local community dynamics and potential conflicts. Some outcomes of the conflict analysis are used for stakeholder engagement planning and implementation. However, because of the complexity of the socio-economic environment, the conflict study doesn't include a sufficient level of detail to support the identification of all potentially affected stakeholders. In one instance (Skimming), the Mine may have engaged with traditional authority leaders that did not represent some members of the community.
1.2.2.1.	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)		The mine has a stakeholder engagement plan and stakeholder engagement action plan in place. An ongoing engagement with stakeholders takes place, including monthly meetings with all villages within the mine area of influence. Limited evidence is available on the historical engagement; records of engagement are available for 2021-2023.
1.2.2.2.	**Critical** The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from		The operating company makes continuous efforts to ensure two-way dialogue meaningful engagement with stakeholders. These efforts are supported by the stakeholder engagement plan development and implementation, stakeholder analysis, a feedback mechanism being available and promoted, community engagement through the community engagement forum and regular meetings with various groups of stakeholders. Relevant information is provided to stakeholders in a timely manner. The company regularly provides information to stakeholders, and there are monthly meetings with each of 52 potentially affected villages (although not all groups of stakeholders may be involved in these meetings). Also, there are separate

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.

meetings with vulnerable groups, relocated stakeholders, and stakeholders affected by grave relocation. There were concerns identified regarding timely responses to grievances and timely sharing of information to stakeholders.

There is participation by site management and subject-matter experts when addressing concerns of significance to stakeholders. A grievance mechanism procedure includes involvement of relevant subject matter experts. The grievance review involves several potential reviews depending on the topic. There were concerns identified among stakeholders regarding company representatives responsible for various topics (e.g., resettlement and information sharing). Therefore, not all stakeholders can confirm that subject matter experts are involved when required.

Engaging in a manner that is respectful and free from manipulation, interference, coercion, or intimidation is confirmed through meeting notes of the community engagement forum, and meeting notes with stakeholders.

Soliciting feedback from stakeholders on issues relevant to them is done through a grievance mechanism and community meetings. Satisfaction surveys are in place. It was shared during interviews that some stakeholders were not aware of the various channels of submitting grievances. Some stakeholders have shared that they did not receive any feedback on the grievances that they have submitted. Community members also expressed some concerns that not all groups were adequately represented in future project planning discussions.

To provide stakeholders with feedback on how the company has taken their input into account, the mine has monthly meetings with stakeholders, where the company provides an overview of actions taken based on the stakeholder's feedback/grievances received. Feedback is provided through the grievance mechanism procedure. At the same time concerns were raised among interviewed stakeholders regarding not receiving feedback from the mine on the issues of concern for them.

1.2.2.3.	The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project's environmental and social performance, and/or input to the company on issues of concern to stakeholders.		Mine collaborates with stakeholders to design and form stakeholder engagement mechanisms, e.g. community profiles. The mine is in the process of developing a community accountability forum to collaborate with various groups of stakeholders. The community accountability forum is designed to receive feedback and address issues of concern for stakeholders. Members of the community accountability forum were identified, but the community accountability forum is not functioning yet. Some groups of stakeholders helped develop stakeholder engagement mechanisms through surveys performed as part of a stakeholder engagement pack. Information is provided to stakeholders on a regular basis through monthly meetings. Not all groups of stakeholders are involved in these meetings.
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.		Operating company has demonstrated efforts made to include participation by women, men, and marginalized and vulnerable groups or their representatives, in particular efforts to ensure that the engagement process developed and implemented by the mine is accessible and culturally appropriate. At the same time, not all groups are engaged, and the engagement process is not accessible and culturally appropriate for all groups of stakeholders. Based on the external interviews, it was identified that many of the interviewed stakeholders are not engaged regularly and do not have access to the grievance mechanism or other means of communication. No issues were identified with the engagement process being culturally inappropriate. A vulnerable stakeholders' analysis matrix was undertaken to guide engagement. The vulnerability study identified vulnerable groups according to potential economic, social, human physical, and nature capital vulnerability.

			The stakeholder engagement plan includes a description of the approach to engagement with vulnerable groups and engagement planning in consideration of conflict. There is an existing procedure guiding the way to dress when going to traditional councils. There are also trained officials within the company who know how to engage different vulnerable groups. All messages are translated into local languages, as per the information provided in the interview. For traditional authority areas, hard copies are posted on the walls, and information is provided in newspapers (according to information provided in the interviews).
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.		The mine is in the process of establishing a community accountability forum. This will include representatives from most villages. The final number of participants or who the participants will be are not defined yet. Terms of reference for the forum are still being discussed. There are several other forums used for stakeholder engagement; however, some of them are dependent on traditional authorities that do not always represent the views and interests of affected community members. No specific survey was conducted to confirm whether traditional authorities or tribal councils represent the interests of a broad range of affected stakeholders.
1.2.2.6.	The operating company shall document engagement processes, including, at minimum, names of participants, and input received from		A requirement for documenting engagement processes is in place. There is evidence of the documentation for all activities carried out by the Mogalakwena mine engagement team. Some mine

	and company feedback provided to stakeholders.		engagement activities are recorded in the Isometrix system. Grievances are recorded in the register. Engagement reporting includes the names of participants, input received from the company and company feedback provided to stakeholders. However, based on the feedback received from external stakeholders, not all engagement is documented. Some issues that were raised by stakeholders interviewed during engagement with the mine were not written down and no evidence of those issues was available.
1.2.2.7.	The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes.		The mine holds monthly meetings with stakeholders, where the mine provides an overview of actions taken based on the stakeholders' feedback and grievances received. As part of the grievance mechanism, responses are provided in a written form or formal close out meetings are held. Based on evidence provided during meetings with stakeholders, a clear set of actions is provided to inform stakeholders how their issues will be addressed. The mine provides a formal letter-response in case a matter cannot be addressed/responded to during the meeting. Based on the feedback received from stakeholders, the mine does not report back on many issues of concern for stakeholders. Insufficient evidence was provided to verify that a robust system of reporting back to stakeholders is in place. At least half of the stakeholders interviewed have reported that they haven't received any responses from the mine to their issues previously raised.
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,		There is a limited number of capacity assessment studies/surveys and capacity-building programs performed by the mine. During stakeholder engagement, it was not always obvious that stakeholders can effectively engage in consultations and studies because of language difficulties and insufficient understanding of

	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.		the subject. (This was revealed during the interviews with the stakeholders that are involved in the resettlement or grave relocation. More than half of the interviewed stakeholders have difficulty understanding the process of the resettlement and grave relocation). There are two capacity-building programs in place, including the municipal capability and partnership program (MCPP), which aims to contribute to municipal capability to mitigate impacts and harness opportunities for the communities within the project area of influence and beyond. The capacity assessment was undertaken during the emergency preparedness study. There is legal support in place for stakeholders involved in the resettlement and grave relocation process. There are no capacity-building programs aimed at supporting stakeholders to effectively engage in consultations, studies, and assessments, apart from the legal support during resettlement and grave relocation.
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.		The mine provides information per stakeholder requests during regular stakeholder meetings, through sustainability reporting, and through reporting back to stakeholders on issues of concerns. However, it was observed that not all stakeholder requests for information are addressed. Although Safety, Health and Environmental Management Policy commits the site to provide information to stakeholders upon request, based on the feedback received from stakeholders, the mine does not report back on many issues of concern for stakeholders. Insufficient evidence was provided to verify that a robust system of reporting back to stakeholders is in place. At least half of the stakeholders interviewed have reported that they haven't received any responses from the mine to their issues previously raised.

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.	—	As per information provided by the mine representatives, no requests for information deemed unreasonable were received. No evidence of such requests was available in the grievance log or in the available meeting notes. The mine provides information per stakeholder requests during regular stakeholder meetings, through sustainability reporting, and through reporting back to stakeholders on issues of concerns. However, it was observed that not all stakeholder requests for information are addressed.
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		The mine provides information per stakeholder requests during regular stakeholder meetings, through sustainability reporting, and through reporting back to stakeholders on issues of concerns. However, it was observed that not all stakeholders' requests for information are addressed. Information sharing in some cases is aimed at some specific stakeholder groups (that are included in the monthly meetings) and does not include a wide range of stakeholders. The mine has implemented several engagement channels that aim to provide information to wider groups of stakeholders. These channels include radio ads and distributing hard copies of newspapers. The mine also has community liaisons who engage regularly with the various communities in their languages. Not all information of significance to stakeholders (e.g. community investment planning, status of the resettlement process, etc.) is provided in local languages, including information related to resettlement and cultural heritage. Some communities highlighted receiving short notice of meetings and not receiving an agenda for the meetings ahead of the time.
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		Evidence of such written notification was provided for some grievances/requests. Based on the Community Relations Action Tracker 2023 the mine responds, either in written form or through

justification for why it has withheld information.		meetings and discussion, to all received grievances or issues raised (that are included in the tracker). At the same time, during stakeholder engagement, many of the interviewed stakeholders reported that they haven't received any feedback/follow-up from the mine on their issues of concern that were submitted as grievances or passed to the mine representatives verbally. At least half of the stakeholders interviewed have reported that they haven't received any responses from the mine to their issues previously raised.

Chapter 1.3—Human Rights Due Diligence			Basis for rating
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	●	The site has adopted a policy commitment to respect all internationally recognized human rights. The policy is part of induction materials for workers and contractors (example of communication is provided). The policy is applicable to personnel, business partners and other parties directly linked to operation. There is annual training for every employee to ensure that they well understand what the policy entails. Human Rights Policy requires to include human rights-related requirements within contractual arrangements with business partners and host governments. The capacity of the contractor to deal with human rights issues is examined and reflected in the contractor social management Policy. Evidence is provided and supported by on-site interviews with managers, the human rights policy, induction and training materials and the responsible sourcing standard for suppliers and demonstrates an implemented commitment to respect internationally recognized human rights.
1.3.1.2.	The policy shall: a. Be approved at the most senior level of the company; b. Be informed by relevant internal and/or external expertise; c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project;	●	The Anglo American human rights policy was signed by both the Anglo American chairperson and the CEO (based on the interviews with mine representatives). The code of conduct was signed by the Anglo American senior staff. The Anglo American human rights policy is aligned with the United Nations Global Compact and the Voluntary Principles on Security and Human Rights (VPSHR), and through being a supporter of the UN Guiding Principles on Business and Human Rights (guiding principles) and several other internationally recognized standards.

	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.		No further evidence of the relevant internal and/or external expertise is available. The policy is the part of induction materials for contractors. The policy is applicable to personnel, business partners and other parties directly linked to the operation. There is annual training for every employee to ensure that they well understand what the policy entails. Human rights related requirements should be incorporated in the contract. The capacity of the contractor to deal with Human rights related issues is examined and reflected in the contractor social management policy. The policy is publicly available (link provided). For external stakeholders, the policy is communicated externally via website. The policy is part of the induction materials. Constant communication of this policy is part of the critical policies of the company, including communication of this policy to contractors. (An example of communication is provided.) Social key performance indicators (KPIs) include impact and risk mitigation and human rights (based on interviews with the mine representatives). Some operational policies and procedures reflect a human rights approach, including Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) tools, the grievance mechanism and the stakeholder engagement plan.
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		The mine contracted external assessors to aid in a Human Rights Due Diligence (HRDD) assessment. At the time of the follow-up IRMA assessment in October 2024, this was mostly complete. The mine stated their intent to better-integrate human rights concerns into other processes, as well as ensuring ongoing monitoring. Additionally, the mine has a risk and impact assessment process that includes the "Baseline Workplace Risk Assessment and Control (WRAC) and Risk assessment" and the "3C Social and human rights impact and risk analysis" (SHIRA) assessment.

	minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.		The baseline WRAC is the main depository of all risks and impacts. The SHIRA assessment considers several other assessments (environmental impact assessment, grievance mechanism, social induced migration study, conflict study). The SHIRA is developed for all operations, and specifically for some projects/activities. The SHIRA includes risks and impacts related to supply chain, procurement, and contactors. Based on the identified risks and impacts, existing management measures are listed, and new management measures are proposed. According to Anglo American requirements, the SHIRA is updated annually or when there are any changes in the operations. The evidence was provided that Mogalakwena site SHIRA was updated annually.
1.3.2.2.	Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall: 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 mine contracted experienced and competent external assessors to aid in the Human Rights Due Diligence (HRDD) assessment. The process followed was aligned to the requirements of the South African constitution, Anglo American Policy and IRMA Standard. There is an existing methodology for the 3C social and human rights impact and risk analysis (SHIRA) process (described as part of the Social Way Toolkit: Social and Human Rights Impact and Risk Analysis). Competent professionals for the human rights impact assessment are not involved in the regular Workplace Risk Assessment and Control /SHIRA risk/impact assessment.

1.3.2.3.	As part of its assessment, the operating company shall document, at minimum: 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.		The assessment methodology for human rights impact/risk assessment is included in the Social Way Toolkit: Social and Human Rights Impact and Risk Analysis. The current human rights context in the country and mining project area is captured through the environmental impact assessment baseline. (An example of the baseline is provided.) However, no specific human right baseline was developed. Relevant human rights laws and norms were not described in the existing environmental impact assessment baseline, but were outlined within the regular Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) risk/impact assessment. A list of potential human rights risks and impacts is provided as part of the WRAC/SHIRA results. This list captures all high-level human right risks and impacts. However, because of the complexity of the socio-economic environment in the area around the mine, not all detailed/specific human rights risks and impacts are captured. The identification of rights holders is done as part of the stakeholder engagement plan and overall assessment of risks and impacts. No specific process is performed for human rights. In some cases, specific human rights holders are identified as part of the linked-to WRAC/SHIRA management plans. Recommendations for preventing, mitigating and remediating identified risks and impacts are provided as part of the WRAC/SHIRA process and relevant management plans. Because of the complexity of the socio-economic environment in the area around the mine, not all detailed/specific human rights risks and impacts are captured. Therefore, not all required measures may be identified and implemented.
1.3.2.4.	At minimum, stakeholders and rights holders who participated in the		Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) results in most cases are not

	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.		provided for public review and comment. During meetings with external stakeholders, some risks and impacts are highlighted and discussed. These meetings are not focused specifically on human rights risks and impacts. There is no evidence of stakeholders providing feedback on the WRAC/SHIRA results specifically. Potential risks and impacts are discussed only as part of regular monthly discussions. Results of the environmental impact assessments are provided for public review as part of the regulatory and permitting process.
1.3.2.5.	The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level.		The Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) process includes identification of existing and proposed management measures. Most of these measures are captured within relevant management plans and thus integrated into the mine operations. Because of the complexity of the socio-economic environment in the area around the mine, not all detailed/specific human rights risks and impacts are captured. Therefore, not all required measures are identified and implemented. Periodical staff training is in place and curriculum specific to human rights is rolled down to sites. There is an advisor on human rights for Platinum sites on issues that relate to human rights.
1.3.3.1.	Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights.		There is a grievance mechanism (GM) in place that is rights compatible. It is not fully accessible for all stakeholders. Stakeholders are regularly informed about the GM, but not all groups of stakeholders receive this data. At least half of the stakeholders interviewed reported that they haven't received any responses from the mine to their issues previously raised.

			There are other mechanisms, mainly the appeal panel, in place where stakeholders can seek recourse (although it has not been used to date based on available evidence).
1.3.3.2.	Responding to human rights risks related to the mining project: 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		Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) tools to some extent determine whether the mine is at risk of causing adverse human rights impacts or contributing to adverse human rights impacts through its mining-related activities. These tools identify potential human right effects and required management measures. However, a specific approach for human rights has not been implemented. There are some risks and potential impacts that may affect human rights identified for various project components. An action plan is developed based on the SHIRA outcomes, and its implementation is tracked monthly. Preventative actions are also included in the management plan. In addition, relevant management plans for managing risks and impacts are developed. There is no evidence that these management plans or the WRAC/SHIRA action plan are developed in consultation with stakeholders. WRAC/SHIRA tools do not always assess potential risks associated with procurement/contractors. Some social performance standards have been implemented for contractors, but these standards do not include links to human rights requirements. In addition to the WRAC/SHIRA process, the mine contracted external assessors to aid in a Human Rights Due Diligence (HRDD) assessment. At the time of the follow-up IRMA assessment in October 2024, this was mostly complete, but related actions were not developed.

	prevent or mitigate their risks to human rights from their activities.		
1.3.3.3.	**Critical** Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall: i. Cease or change the activity responsible for the impact; and ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders; b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;		The Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) lists both potential and actual risks/impacts, including human rights impacts/risks. It is not always clear what risks/impacts are potential and what are actual. In addition to the WRAC/SHIRA process, the mine contracted external assessors to aid in a Human Rights Due Diligence (HRDD) assessment. a. Based on understanding of the mine operations and interviews with stakeholders, several risks/impacts listed in the SHIRA/WRAC documents, where the mine caused the human rights impacts, are actual (mainly risks/impacts related to resettlement) i. In the case of resettlement, the mine has changed its approach to the resettlement process to avoid potential human rights impacts and has initiated a completion audit of the resettlement process to identify impacts (including human rights impacts) that were associated with the past resettlement. ii. In the case of past resettlement human rights impacts, the mine has initiated a completion audit. The purpose of the audit was to identify mitigation strategies and remediation for the potential human rights impacts related to resettlement. Stakeholders were involved in the discussion of potential mitigation strategies through this audit. Based on the outcomes of the audit, an action plan is being developed. The action plan was not available for a review. In addition to the completion audit, HRDD outlines actions to address identified human rights impacts. However, HRDD was not completed in October 2024 and was not available for review. It is unclear what mitigation measures will be included in both the completion audit and HRDD, and whether they will address the identified impacts. b. Some identified risks/impacts on human rights may not be the direct outcome of the mine operations. Some human rights related risks/impacts where mine can contribute to

	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.		an actual human rights impact are captured through the SHIRA/WRAC process. In these cases, SHIRA/WRAC action plans include relevant measures aimed at engaging other involved parties and to use mine's leverage to influence other contributing parties to cease or change their activities. E.g. for the grave relocation process that may lead to community infights and separation in traditional authorities, mine has developed a list of mitigation measures including engagement with traditional authorities per different topics. HRDD outlines actions to address identified human rights impacts. However, HRDD was not completed in October 2024 and was not available for review. It is unclear what mitigation measures will be included in HRDD, and whether they will address the identified impacts. c. Risks/impacts related to business partners of the mine are not assessed through the SHIRA/WRAC process. There are mechanisms in place to mitigate potential social impacts, including human right impacts, caused by business partners of the mine (e.g., social requirements to contractors). d. There were no cases identified when the mine caused, contributed to, or was directly linked to human rights violations through its business relationships.
1.3.4.1.	The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.		The control monitoring procedure defines monitoring requirements. All mine functions (operations) have critical controls that they monitor. Management plans developed based on the risk and impact assessment are monitored as part of this process. Action plans that support implementation of management measures identified by Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) include a monitoring piece where implementation is monitored. No specific monitoring for salient adverse human rights risks and impacts and their management is implemented.

1.3.4.2.	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: 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.	⊗	Based on available baseline information and feedback received from stakeholders, cases of human rights impacts may take place. The mine has not implemented a human rights due diligence process, and no external monitoring was implemented. There is no mechanism to trigger external monitoring in place.
1.3.5.1.	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.	⊗	Some elements of the operation performance are disclosed (e.g., environmental impact assessment, generalized information about Anglo American operations and human rights). No specific reporting on the human rights impact assessment or Social and human rights impact and risk analysis (SHIRA) outcomes is in place or required by the operation. Based on available baseline information and feedback received from stakeholders, cases of human rights impacts take place. The mine has not implemented a human rights due diligence process. No reporting on the outcomes of the human rights due diligence process takes place.
1.3.5.2.	If relevant, the operating company shall publish a report on external monitoring findings and	⊗	Based on available baseline information and feedback received from stakeholders, cases of human rights impacts take place. The mine has not implemented a human rights due diligence process.

	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.		No reporting on the outcomes of the human rights due diligence process takes place.
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.		The sustainability study provides information on local procurement spending, Although the information can be traced to the names and confidential information related to contractors, the information is withheld during publicizing to prevent victimization of contractors who benefited from the funds.

Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy		Basis for rating
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.	During external interviews, limited utilization of available grievance mechanisms for some groups of stakeholders was observed. There are more than 172,000 stakeholders located in areas of potential impact from the Mine. However, only 64 grievances were received from community members at the time of the IRMA Stage 2 audit in November 2023. Comments received in writing prior to and during the follow-up assessment in October 2024 also highlighted that some community members felt concerns related to planned future mine expansion had not been addressed adequately. A preferred approach of working through village traditional authority leaders had also proven ineffective in some cases. Although there are several mechanisms for grievance submission in place and based on onsite management interviews these mechanisms have been communicated to stakeholders, not all stakeholders are aware of the grievance mechanism process or have received feedback through this process when it has been used. In many cases, stakeholders have reported that they do not know how to submit grievances. Many stakeholders reported only being aware of the possibility of submitting grievances through a liaison officer. Other means are not well understood. Some stakeholders are also not able to submit grievances via the Internet as widespread or consistent access to the Internet is not available. In an effort to begin to address the concerns raised by community members during Stage 2, in 2024 Mogalakwena conducted a baseline survey to further verify audit findings. A paper survey was distributed to approximately 14,000 households in 52 villages. The survey confirmed that a majority of stakeholders, some of which were members of vulnerable groups, were unaware of grievance procedures available. Of the groups and respondents that were aware many chose not to use the mechanisms available, preferring

			instead to approach traditional authority leadership with an issue or concern. Subsequent to this survey the mine has installed 50 noticeboards, promoted its grievance process through a series of radio broadcasts and formalized its engagement with traditional authority leadership. The mine also opened a toll-free phone number for community members to raise issues and concerns, advertising the number in radio broadcasts and distribution of the number of key fobs. The mine plans to undertake annual surveys in order to evaluate the effectiveness of its external grievance mechanism.
1.4.2.1.	The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum: 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; 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;		Stakeholders were involved in the development of stakeholder engagement mechanisms through the grievance consultation process (evidence provided for two meetings). Effectiveness of a grievance mechanism (GM): (a) Legitimate. Some stakeholders were involved in the development of stakeholder engagement mechanisms through the grievance consultation process. Many of the interviewed external stakeholders do not trust the GM process because they do not receive responses to their grievances. (b) Accessible. The GM is disclosed during community meetings and through public media. There are various ways to submit grievances, including channels suggested by stakeholders. At the same time, the GM is not fully accessible to all stakeholders. (c) Predictable. The GM framework describes a procedure for grievance management and a suggested timeframe for responses. At the same time, many external stakeholders noted that they have submitted grievances but haven't received any responses. At least half of the stakeholders interviewed reported that they haven't received any responses from the mine to their issues previously raised. (d) Equitable. Some satisfaction surveys were conducted to confirm stakeholders are aware of the process and understand it. There is

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.

mainly positive feedback through these surveys (10 samples were provided). At the same time, many external stakeholders noted that they are not aware of the process and /or do not understand it.

(e) Transparent. The operation provides information through regular meetings back to stakeholders on grievances received. Some evidence is available from meeting notes. Also, formal written responses are provided in some cases. At the same time, many external stakeholders noted that they do not receive responses to their grievances in a timely manner.

(f) Rights-compatible. There is no separate process for human rights described within the GM framework. At the same time, there is a vulnerability rating incorporated in the GM.

(g) A source of continuous learning. There are surveys aimed at verifying whether stakeholders are satisfied with the procedure. No information is available regarding the planned reviews.

(h) Based on engagement and dialogue. Some stakeholders were involved in the development of stakeholder engagement mechanisms through the grievance consultation process. (Meeting notes are available for two meetings.) However, there are large groups of stakeholders that are not involved in the GM design process.

The GM framework describes how grievances are filed, acknowledged, investigated, and resolved, including general timeframes for each phase.

There is a requirement in the GM that it is the responsibility of the senior social performance manager to ensure that stakeholders have the option to log grievances in a confidential manner without fear of being victimized. Limited evidence is available of grievances submitted anonymously.

The GM includes various channels for grievance submission that make it more accessible to vulnerable groups. At the same time, the GM remains not fully accessible to all stakeholders.

			A grievance appeal panel may be formed if stakeholders are not satisfied with the grievance resolution (described as part of the GM procedure). No cases of appeal panel development took place. Also, a dispute process may be started. (One example was shared). The GM framework sets requirements for grievance reporting. In particular, the social performance team administrator will be responsible for keeping documentation on the complaints and incidents. A grievance log for 2023 is in place. The grievance mechanism is not fully effective. At least half of the stakeholders interviewed reported that they haven't received any responses from the mine to their issues previously raised.
1.4.2.2.	The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available.		The grievance mechanism (GM) procedure is documented as part of the "Social Incidents, Complaints and Grievance Management Procedure." The GM procedure is shared with stakeholders during meetings and through media (newspapers, radio). Examples of the presentations with the GM description that are provided to stakeholders were provided for review. It is not clear whether the grievance procedure is available for all groups of stakeholders, as not all groups of stakeholders may have access to the data-sharing channels described above.
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.		A grievance appeal panel may be formed in case stakeholders are not satisfied with the grievance resolution. No cases of appeal panel development took place. Also, a dispute process may be started with stakeholders reaching out to court. One example of a stakeholder reaching out to court was shared during the interview with a company representative, but no additional evidence was provided.

1.4.4.1.	Complaints and grievances and their outcomes and remedies shall be documented.		The mine has an approved grievance and incidents management procedure and is currently in the process of reviewing that procedure. The grievance mechanism framework sets requirements for grievance reporting. In particular, the social performance administrator is responsible for keeping documentation on the complaints and incidents. A grievance log for 2023 is available for review. All grievances that are documented have been responded to. A grievances management weekly report is regularly developed. At the same time, at least half of the stakeholders interviewed reported that they haven't received any responses from the mine to the issues previously raised.
1.4.4.2.	The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine: a. If changes need to be made to improve its effectiveness as per 1.4.2.1.a; b. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and c. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights.		The social performance management committee regularly reviews grievances (weekly reports provided for a review). At the time of audit and based on evidence provided no specific actions were recommended for the grievance mechanism framework based on the materials provided. A grievance survey was held (10 survey samples were provided for the review). Based on the interviews with stakeholders, changes to the grievance mechanism procedure were made; however, no evidence of changes to prevent or mitigate similar grievances in future were observed. No evidence exists as to whether the review of the outcomes of the grievance mechanism procedure led to any changes in the procedure in the aspects related to human rights.
1.4.4.3.	Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance		Opportunities for submitting feedback on the performance of the complaints and grievance mechanism are not clearly described within the advertising materials. Satisfaction surveys with stakeholders are conducted to assess the effectiveness of the

	of the complaints and grievance mechanism.		grievance mechanism procedure and to allow stakeholders to submit their feedback.
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.		The grievance mechanism procedure is shared with stakeholders during meetings (engagement pack) and through media (ads in the local media). At the same time, in many cases stakeholders have reported that they don't know how to submit grievances, or they have submitted grievances but haven't received any responses. At least half of the stakeholders interviewed reported that they haven't received any responses from the mine to their issues previously raised.
1.4.5.2.	The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies.		The grievance mechanism (GM) framework mentions the appeal panel to further discuss unresolved grievances. According to the GM framework, Anglo American sites are required to establish an appeals panel for stakeholders who are not satisfied with a proposed grievance resolution. The grievance appeal panel (GAP) is a panel that must include independent experts in the specific topic area relating to the grievance. There is no evidence that the GAP has been used to date. Other alternative mechanisms aimed at addressing stakeholders' concerns are also available, including court appeals.
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,		There is a list of trained personnel for grievance handling. Training materials include an approach to grievance management. No specific instruction is included in the respectful handling of all complaints and grievances, including those that may appear frivolous.

	including those that may appear frivolous.		
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.		Operation gathers information and analyses grievances regularly. To some extent this information is shared with stakeholders during regular meetings. No regularly established mechanism is in place for this process.

Chapter 1.5—Revenue and Payments Transparency			Basis for rating
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.	●	Documents provided suggest that Anglo American complies with EU Accounting and Transparency directives. The Platinum group tax and economic contribution report state that information is disclosed that satisfies the requirements of the following transparency initiatives: – UK Reports on Payments to Governments Regulations 2014 (SI 2014/3209) – Chapter 10 of the EU Accounting Directive (2013/34/EU) – Global Reporting Initiative 207 (Tax:2019) which include public country-by-country reporting – Australian Board of Taxation Voluntary Tax Transparency Code – UK's 'Publish Your Large Business Tax Strategy' (which is a requirement as a result of our UK listing). On-site personnel reported that the platinum operation does not follow the EU Directive; however, the documents provided demonstrate that all regulations (including EU Accounting Directive) are complied with, show tax paid in all jurisdictions and include signed commitments by board and senior leadership.
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	—	The Platinum group tax and economic contribution report states that information is disclosed in line with Chapter 10 of the European Union Accounting Directive (2013/34/EU).

	months after the end of each financial year.		
1.5.1.3.	The types of payment disclosed shall include as a minimum, as applicable: 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 i. Any other significant payments and material benefits to government, including in kind payments.	—	The company voluntarily follows the European Union Accounting Directive.
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.	◔	Anglo American operates within South Africa, and most of the contributions to the government are carried out from an Anglo group perspective as opposed to business unit (Anglo American Platinum and Mogalakwena) level. Details of breakdown by recipient government body (where applicable), by project (where applicable), and by payment type are not included in the provided documents, which are quite high-level and global. Taxes are paid at company (Anglo American Platinum) level, and most information is rolled up to that level.

			Mines are not considered "projects" for purposes of this requirement. The requirement does appear to be met at the Anglo American group level (AAP) but not site level.
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.	—	Anglo American voluntarily follows the European Union directives or an equivalent mandatory transparency regime.
1.5.2.2.	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: 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;		Not all information on revenue and payments reporting and disclosure, as outlined in the requirements of this chapter, is included in the published reports. In addition, the reports comprise a consolidation of various disclosures for Anglo American group and consolidated entities (Anglo Plats, etc.) but not completely for the Mogalakwena entity.

	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.		
1.5.2.3.	The operating company shall publish annual accounts, following international accounting standards.	●	Annual financial audits are assessed using internationally acceptable accounting practices.
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.	●	South Africa is not a subscriber country to the Extractive Industries Transparency Initiative (EITI), but Anglo American (group) is a supporter of the EITI. Anglo American Platinum, as a member of the Anglo American group, is a supporting company and complies with the principles of the initiative. EITI public commitment is displayed and available on the Anglo American Platinum website.
1.5.3.2.	If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall: 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	—	The company states that they commit to engage with and support the Extractive Industries Transparency Initiative (EITI). However, EITI is not currently active in South Africa, so although Anglo American is committed to supporting EITI, this requirement is Not Relevant.

	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.		
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. 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.		The ore reserve and mineral resource estimates are reported in accordance with the South African Code for the Reporting of Exploration Results, Mineral Resources and Mineral Reserves (The SAMREC Code, 2016 Edition). The reported estimates represent 100% of the ore reserves and mineral resources.
1.5.4.2.	The beneficial ownership of the operating company shall be publicly accessible.		Although contracts are not published by law due to confidentiality, aspects such as mining rights can be requested through the regulator. Ownership and structure are published on the Anglo American website.
1.5.5.1.	**Critical** The operating company shall develop, document and implement		Anti bribery and corruption policies are in place and well documented. These are communicated to employees and to

	policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.		contractors during the contractor onboarding process. The policies are posted publicly via the Anglo American website. Allegations and complaints with respect to bribery and corruption are reported through the YourVoice platform, which also allows for anonymous reporting. Allegations and complaints are investigated, and depending on the nature of the corrupt activity, these are managed through the Anglo American Platinum group to ensure transparency and avoid bias or perception of "special treatment" shown to alleged guilty parties. Statements made during Stage 2 on-site assessment interviews with workers allege instances of corrupt activities by mine management were not adequately investigated and appropriate corrective actions taken..
1.5.5.2.	Procedures shall include: 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 b. Disciplinary actions to be taken if cases of bribery or corruption are discovered.		A procedure to manage potential fraud and corruption cases was provided and reviewed. In addition, the YourVoice platform is an anonymous reporting platform to report corrupt and unfair activities taking place at Mogalakwena.
1.5.5.3.	Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.		While training is in place for employees through induction and other internal processes, it is understood that all Anglo American group policies are shared with contractors through the Passport 360 program. The Voice platform (anonymous reporting) is displayed on notice boards and main entrance points across the mine operations. Evidence presented does not show all contractors having gone through antibribery and corruption training (particularly the small-scale, local contractors).

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 changed in the way Chapter 2.1 was to be audited for existing mines. [1] The table below shows where expectations are different for new versus existing mines. Existing mines are only required to meet a core set of requirements related to assessment of environmental and social risks (called CORE requirements), although existing mines have the option to be audited against the new mine requirements. If they have opted to do so, that will be reflected in the Basis for rating column. Existing mines are still required to have in place an environmental and social management system.

[1] For more information, see the IRMA Guidance Note on Chapter 2.1: https://responsiblemining.net/wp-content/uploads/2021/07/Chapter-2.1-ESIA-Guidance-Final-2020.pdf)

Chapter 2.1—Environmental and Social Impact Assessment and Management			Basis for rating
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.	●	The mine first opened in 1924, at which time there was no requirement for an environmental and social impact assessment (EISA) to be conducted. The first record of such a document is in the Environmental Management Program Report from 1996. The 2019 EISA followed the prescribed environmental impact assessment process, which includes both the environmental and social impact studies.
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 2018, the reviewed design reports were submitted for approval to the authorities during the scoping process. These were also included in the 2019 Final Environmental Impact Assessment. Construction only commenced after the approval was received.
2.1.1.3.	The ESIA shall be carried out in accordance with publicly available, documented procedures.	●	Mogalakwena Mine adheres to the environmental impact assessment (EIA) regulations as outlined in the National Environmental Management Act (NEMA) EIA Regulations of 2014. Following the prescribed procedure, the competent authority grants the mine an environmental authorization (EA), which serves as evidence that Mogalakwena Mine has followed the necessary procedure as outlined in the regulations.

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.		As part of the environmental impact assessment process, independent consultants, appointed by the mine, facilitate the announcements of new projects. Various media such as emails, SMS text messaging, site notices, newspapers, radio broadcasts, focus groups, and public meetings are used for dissemination. To ensure effective communication and cultural appropriateness, the announcements are made in languages widely understood by the interested and affected parties in and around the mine.
2.1.2.2.	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: 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		The scoping report, as prepared by the appointed consultants, is published on the consultant's external website for a period of 30 days, as specified by National Environmental Management Act (NEMA) Environmental Impact Assessment Regulations of 2014. In addition to the website publication, physical copies of the report are distributed to various public spaces, including traditional council offices and various administrative offices within the community. The report is available on the company website during the public participation process.

	stakeholder participation in the process; and d. Contact details for the person or team responsible for management of the ESIA.		
2.1.3.1.	**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. **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.		A detailed review of the scoping report for the Integrated Environmental Authorization / Waste Management License Process, and Consolidation 2020 was done and found to meet all the IRMA requirements. It was confirmed that the scoping report included both environmental and social impacts.
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 database of all the stakeholders that would be affected by, or who live near the mine, was compiled during the scoping process. The database is continuously updated to ensure its accuracy and relevance throughout the entire scoping and environmental and social impact assessment process. Any individual who registers as an interested and affected party (I&AP) will be automatically added to the database.
2.1.3.3.	Scoping shall include the consideration of: a. Social impacts (including potential impacts on communities and workers) and environmental		The scoping report reviewed includes environmental and social impacts and whether the impact is direct, indirect or cumulative. Fatal flaws and extreme events are also identified and evaluated in the scoping report.

	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.		
2.1.3.4	Scoping shall result in the identification of: 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 d. Additional information and data needed to understand and assess the potential impacts.	●	The Anglo American Platinum Limited Rustenburg Platinum Mines, Mogalakwena Complex Final Scoping Report for Integrated Environmental Authorization / Waste Management License Process, Consolidation & Amendment, 2020 was reviewed against the IRMA requirement and sub-requirements and was found to comply with all the requirements set out in this IRMA requirement.
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.	●	The 1996 and subsequent 2019 Environmental and Social Impact Report 2019 review showed the baseline data collected. This data is then applied to assess the potential impacts the proposed project could have on both the social and the environmental factors.

2.1.4.2.	Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA.	●	Once the impacts or the proposed projects are identified during the scoping phase, additional specialist studies are identified from the impacts. These studies can be found in the appendix to the Environmental Impact Assessment (EIA) report and typically include water and air quality.
2.1.5.1	The operating company shall: 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 Environmental Impact Assessment (EIA) report provides a comprehensive analysis of the impacts identified during the scoping phase. The significance of these impacts is evaluated using a formula that considers factors such as duration, extent, magnitude, and probability. The primary objective is to prevent the occurrence of the impact. If prevention is not possible, measures are implemented to minimize the impact following the mitigation hierarchy principle. Residual impacts are addressed in the reclamation and closure plan.
2.1.6.1.	The operating company shall prepare an ESIA report that includes, at minimum:	●	The Final Environmental Impact Assessment (EIA) dated 2019, which includes the social impact assessment report, was reviewed and found to be compliant with all the subsequent requirements in this IRMA requirement.

	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 mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts; d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and e. Names and affiliations of ESIA authors and others involved in technical studies.		
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 ISO 14001 certified and has implemented the Social Way in-house Anglo American system to manage environmental and social risks. The identified risks are uploaded into the electronic tool Isometrix. Examples of how the uploaded risks are managed were viewed by the auditor. The system is proactive, and escalation to the next level of management is activated if actions are not attended to by the person responsible.
2.1.7.2	An environmental and social management plan (or its equivalent) shall be developed that, at minimum:		All mitigation measures identified for all the environmental and social impacts are listed in the Environmental Impact Assessment (EIA) and the environmental management program (EMPr). The EMPr is audited annually. When non-compliances are observed, the

	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; b. Assigns personnel responsible for implementation of various elements of the plan; and c. Includes estimates for the resources needed to implement the plan.		finding is captured on Isometrix and allocated to a responsible person to address the action. Currently, the resources required, and responsible persons are not assigned in the EIA report or the EMPr.
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.	●	All the environmental and social impacts and mitigations are listed in the management plan that is reviewed when new projects are planned. The management plan is also reviewed after annual audits are conducted.
2.1.8.1.	As part of the ESMS, the operating company shall establish a program to monitor: a. The significant environmental and social impacts identified during or after the ESIA process; and b. The effectiveness of mitigation measures implemented to address environmental and social impacts.	●	The environmental management plan is annually audited as per the National Environment Management Act Regulation 34. The audit findings are documented and recorded in Isometrix, which enables the tracking of actions until findings are closed out. The need for an amendment to the management plan is based on the findings. The outcome of this audit is published on the Anglo American website.
2.1.8.2.	The monitoring program shall be designed and carried out by competent professionals.	●	Several documents were submitted to confirm the qualification and competence of professionals appointed by the mine for various tasks relating to, but not limited to, air quality and water quality.

			These documents were submitted by Aquatico, Air shed, Environmental Assessment Practitioner, etc.
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.	●	No stakeholder requests have been made, but the company informed the auditor that, if requested, it would facilitate independent monitoring.
2.1.9.1.	**(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: 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	●	The draft Environmental Impact Assessment (EIA) report is made available to stakeholders for a designated 30-day period. The report is made available at local administrative offices, including the Tribal council office, and online through the consultant's external website. During this period, stakeholders can provide comments on all sections of the report. Both the scoping report and the final EIA report are made available for public comment.

	f. The final conclusions and recommendations of the ESIA (see 2.1.6.1). **(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		
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 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.		Public participation is conducted in the local language, in various communities during the environmental impact assessment (EIA) process. The appointed consultant facilitates participation through public meetings where stakeholders are encouraged to give their input; however, it is not clear that mitigation measures are specifically addressed. In the case of the process of grave relocations, a consultant was appointed, and a report was submitted to show evidence of consultation with the affected community and the next-of-kin (NoK). A memorandum by Digby Wells was reviewed. The memorandum provided a summary of the discussion and activities that resulted from the Mogalakwena Mining Complex (MMC) Focus Group Discussion (FGD) workshop. Representatives of the following parties attended the discussion: • 7 Ga-Puka Big 7 Group (Big 7) • Mapela Traditional Council (MTC) • Digby Wells Environmental (Digby Wells)
2.1.9.3.	The operating company shall provide for timely and effective stakeholder consultation, review and comment on		During interviews conducted with the environmental department, it was confirmed that currently the mine does not have a process in

	the scope and design of the environmental and social monitoring program.		place allowing stakeholders to comment on the design of the environmental and social monitoring program.
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.		During interviews conducted with the environmental department, it was confirmed that the mine currently has no documented process in place that would include stakeholders in implementing the environmental and social monitoring program.
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.		Currently, the mine only records the comments and questions that were received during the public participation process. The mine has not developed a mechanism to record and respond to comments during the phases of the project.
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		The mine publishes notices that show the list of social and environmental impacts from the project. Other information regarding the outcomes of the environmental impact assessment (EIA) is available on request.

	and risks associated with the mining operation shall be made public		
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.		The independent consultant publishes a stakeholder engagement report that contains all the comments and the responses from the mine.
2.1.10.3.	The environmental and social management plan shall be made available to stakeholders upon request.		The mine's safety, health and environment policy states: safety, health and environmental-related information will be available to interested parties on request, in alignment with the requirements of the Anglo American group information security policy.
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.		A combined report that includes all the Anglo American Platinum mines, which contains the Section 34 audit findings, is published on the Anglo American website. The report is not made available in any other public places.
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 mine has, to date, not determined how environmental, social management system (ESMS) information or in what formats and languages, that are culturally appropriate, accessible, and understandable to affected stakeholders ESMS information will be made available.

Chapter 2.2—Free, Prior and Informed Consent (FPIC)		Basis for rating
Chapter Not Relevant	—	This chapter was not assessed as part of Stage 1 or Stage 2 on-site audit. The operating company asserts 2.2 Free, Prior and Informed Consent chapter as Not Relevant. The Group Code of Conduct, Human Rights Policy, and Social Way 3.0 Toolkit 4l Indigenous Peoples describe the company's commitment to respect Indigenous peoples' rights. However, in the South African context, the operating company maintains that there are no Indigenous Peoples with rights and interests within the mine area and therefore free prior informed consent is not applicable. External engagement included interviews with traditional authority representatives that assert collective land rights but not the rights of Indigenous Peoples or free prior informed consent. On review, and based on this engagement, acknowledging the position taken by the operating company with respect to the presence of Indigenous Peoples in the mine area, the audit team concluded this chapter was not relevant.

Chapter 2.3—Obtaining Community Support and Delivering Benefits			Basis for rating
2.3.1.1.	The operating company shall publicly commit to: 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.	●	Programs and commitments to health/socio-economic wellbeing of affected communities are included in the social labor plan (SLP) - a publicly disclosed document. The mine has a number of policies in place, and as part of the Anglo American group, there is an overall commitment to the social wellbeing. Based on the Sustainable Mine Plan, and specifically the Health and Wellbeing and Livelihoods pillars, Mogalakwena mine is committed to maintaining or improving the health, social and economic wellbeing of affected communities. a. Anglo American makes the following commitment as part of the Sustainability Report 2022: "We believe that our role as a global business is to make a positive contribution to society. Through the implementation of our social performance management system – the Social Way 3.0 – and through our Collaborative Regional Development program, we are working actively to support local and regional economies, as well as the lives and livelihoods of the communities where we operate." b. There is no clear stated commitment regarding maintaining broad community support. Documented evidence shows, however, that community support is received when undertaking operational activities.
2.3.2.1.	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.	—	Mogalakwena is an existing operation.

2.3.2.2.	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: 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.		Mogalakwena is an existing operation.
2.3.2.3.	For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.		There appears to be general support for the mine operations. Although grievances are raised regularly, many of those are also linked to a general state of dissatisfaction due to external factors. The mine is actively working in and with communities to maintain support for its operations. Many stakeholders interviewed are not satisfied with the community support programs. This can be related to the challenging socio-economic conditions in the area of influence of the mine. Almost all the stakeholders interviewed were

			looking for more support from the mine. All the interviewed traditional and municipal authorities, as well as local service providers, acknowledged the support provided by the mine. There is a legal requirement for obtaining a social license to operate, this license is provided by the Department of Mineral Resources and Energy (DMRE) by approving the company's social labor plan (SLP). The mine developed and submitted an SLP for DMRE review in 2023 and an approval was received in the same year.
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.		The SLP is the main planning framework that guides community development in the affected communities. Participatory planning for community support programs includes consultations with 22 groups of stakeholders, including consultations with traditional authorities and headmen, consultations with local authorities, and consultations with community structures. Social benefit programs are also discussed during regular monthly meetings with stakeholders. At the same time, feedback was provided by interviewed stakeholders that the priorities identified by the mine are not always the sections/initiatives important for local stakeholders. There is no evidence of participation of the interviewed stakeholders that were not part of traditional or municipal authorities or service providers in the planning process.
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		Participatory planning for community support programs includes consultations with traditional authorities and headmen, consultations with local authorities, and consultations with community structures and forums. The planning process for engagements accounts for a broad spectrum of stakeholders, including vulnerable groups. All engagement, including community development planning, is guided by the mine and Anglo American social performance

	representatives), good governance and transparency.		guidance documents, the stakeholder engagement plan, and outcomes of the vulnerability study. At the same time, feedback was provided by interviewed stakeholders that the priorities identified by the mine are not always the sections/initiatives important for local stakeholders. There is no evidence of participation of the interviewed stakeholders that were not part of traditional or municipal authorities or service providers in the planning process. There is limited evidence that vulnerable groups are actively involved in the planning process. At the same time, household questionnaires were provided in all doorstep communities to identify communities' priorities.
2.3.3.3.	If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process.		There is no evidence that funding for mutually agreed upon experts to aid in the participatory process was requested by communities. This issue was not raised during external stakeholder engagement.
2.3.3.4.	Efforts shall be made to develop: a. Local procurement opportunities; b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations).		Based on interviews with company representatives, local procurement opportunities are prioritized. It is not always clear how local procurement opportunities involve vulnerable groups. a. Local procurement at the mine is currently 18% as of October 2023 (spending within the mine area of Influence to all mine spending). Sustainable Mining Plan sets targets for some criteria related to local procurement opportunities, including requirements to have ethical value chains mine certification and targets for ethical value chains responsible sourcing. In addition, employment and procurement opportunities are prioritized for local residents/businesses. b. The mine has invested in a broad range of projects that benefit vulnerable groups. In particular, the mine constructed a medical

			clinic, a school, a drop-off center for children and youth, and a community center. c. The social labor plan includes programs that will help to sustain communities after closure. There are several self-sustaining initiatives supported by the mine, (e.g., training center.)
2.3.3.5.	The planning process and any outcomes or decisions shall be documented and made publicly available.		The social labor plan (SLP) consolidates final decisions on community support. SLP planning / decisions / outcomes are frequently shared publicly in engagement feedback sessions. The planning process and its outcomes are to some extent documented within the stakehole engagement packs that are provided for stakeholder review and discussion monthly.
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.		Monitoring the social benefit programs is a Department of Mineral Resources and Energy (DMRE) requirement for the social labor plan (SLP). The mine developed and submitted an SLP for DMRE review in 2023 and an approval was received in the same year. The mine monitors the outcomes of the community support programs. In particular, the report “Impact Evaluation of SLP 2 Projects” provides an overview of the implemented projects. It is not clear whether the monitoring program was developed in collaboration with the community and with agreed upon indicators.

Chapter 2.4A—Resettlement

IRMA provides additional guidance on applying this chapter in the IRMA Standard for Responsible Mining 1.0–Guidance Document, Version 1.2. This guidance specifically addresses resettlements based on when they were completed. This guidance distinguishes between new mines (where operations began after the IRMA standard was first published in June 2018) and existing mines (where operations began before 2018). For the purpose of this determination, "complete" was interpreted to mean the physical relocation activities were complete even if mitigation, monitoring and corrective action were not yet complete or might even still be ongoing.

- Resettlements completed prior to April 30, 2006 are not audited against the chapter; however, IRMA requires that residual human rights impacts related to resettlement be included in Chapter 1.3, and issues related to access to grievance of ongoing concerns be included in Chapter 1.4.
- Resettlements completed after April 30, 2006, as well as ongoing resettlements proposed before 2018, are audited against a subset of this chapter, recognizing that existing mines may not have followed all of the best practices laid out in Chapter 2.4, e.g., because resettlement occurred before these practices were well defined or widely applied, or they may not have kept the data or documentation or have institutional knowledge to demonstrate that certain practices took place. Consequently, certain requirements will either not be able to be verified or can no longer be met (or is of little or no value to do so) by some existing mines. These requirements can be marked as "not relevant," which means the requirements will not be factored into the chapter score.
- Resettlements completed at new mines are audited against the full chapter.
- Resettlements related to proposed changes at existing mines (e.g., resettlement proposed after 2018) are audited against the full chapter.

In the case of Mogalakwena, the mine has conducted or proposed resettlement actions that fall into several of the above scenarios and it proved difficult to assign a single performance rating for resettlements held to different standards. As a result, the auditors have assessed this chapter twice; once to capture the older resettlement that are subject to only a limited set of requirements and again to capture resettlements proposed or completed after 2018 that are subject to the full chapter. These are assessed in this report as Chapter 2.4A (older resettlement) and Chapter 2.4B. A summary of the relevant resettlements included in each chapter is provided. This two-chapter approach is consistent with the proposed revisions to the IRMA standard (not yet published).

Background on Resettlements Covered by Chapter 2.4A:

Chapter 2.4A includes assessment of the Old Mothlotlo Resettlement, which was planned in 2002-2007, implemented in 2007-2009, and monitoring and evaluation took place in 2010-2011. In 2018 a completion audit was performed. Ga-Pila, Ga-Puka and Ga-Sekhaolelo were communities relocated as part of the Old Mothlotlo resettlement process.

Mogalakwena's expansion resulted in the relocation of the Ga-Pila (756 households) and the Mothlotlo communities (Ga-Sekhaolelo and Ga-Puka, including 956 households) in 2001 and 2007, respectively. Approximately 176 households remained in Mothlotlo by 2013, and a new Resettlement Plan (RAP) was completed to provide these households with access to an alternative relocation site (Tobias Zyn Farm) and largely the same entitlements provided to households that relocated to Ga-Puka and Ga-Sekhaolelo. The implementation of the 2013 RAP was largely completed for the 112 households who opted to also relocate to Ga-Puka and Ga-Sekhaolelo under the terms of the 2012 resettlement agreement, however, households that opted to relocate to Tobias Zyn remained in Mothlotlo as the property was later deemed unsuitable for residential use. For the purposes of this Audit, resettlement planning to relocate households from Mothlotlo in 2001-2007 and 2013 to Ga-Sekhaolelo and Ga-Puka are collectively referred to as the 'Old Mothlotlo' relocations, which excludes relocation planning that was completed in 2018 for the 64 households that remained in Mothlotlo as well as resettlement planning initiated after 2018 for communities such as Skimming and Leruleng is referred. Chapter 2.4 A provides the assessment of the Old Mothlotlo Relocations, while the remaining relocation processes are evaluated in Chapter 2.4 B

Monitoring and evaluation of Old Mothlotlo Relocations, especially households that relocated as part of the 2013 RAP, was concluded in 2015, whereafter AAP commissioned an Independent Resettlement Review (IRR) in 2016. The IRR was completed in 2018. It considered previous monitoring and evaluation (M&E) findings and provided a completion audit of Old Mothlotlo relocations and identified residual resettlement and livelihood impacts that persisted within each of the historically relocated communities. Following the IRR, AAP initiated a long-term remediation approach in 2019 to address residual resettlement impacts. Phase 1 and 2 of the remediation process have been completed, with drafting of Remedial Planning (RRLRP) and disclosure of IRR Findings and AAPs Remedial Strategy to relevant stakeholders.

Mogalakwena Mine is an existing mine. In accordance with the IRMA requirements, resettlements completed after April 30, 2006, but before 2018 are audited against a subset of this chapter. Therefore, Old Mothlotlo resettlement is audited against a subset of this chapter.

Those requirements not relevant for this review have been noted as such in the column for "basis for rating" and have been rated not relevant.

Chapter 2.4. (A) - Resettlement			Basis for rating
2.4.1.1. *(2.4A)*	If there is the potential that a new mine (including associated facilities) or the expansion of an existing mine or associated facilities may require land acquisition that could result in the involuntary resettlement (for the remainder of this chapter, referred to simply as resettlement) of people, the operating company shall undertake an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.1.2. *(2.4A)*	The assessment shall: a. Be undertaken during the early stages of mining project planning; b. Include identification of alternative mining project designs to avoid, and if that is not possible, minimize the displacement of people; c. Identify and analyze the social, cultural, human rights, conflict,	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

	environmental and economic risks and impacts to displaced persons and host communities for each project design alternative, paying particular attention to potential impacts on women, children, the poor and vulnerable groups; and d. Identify measures to prevent and mitigate risks and impacts and estimate the costs of implementing the measures.		
2.4.1.3. *(2.4A)*	The assessment shall be undertaken by competent professionals with experience in resettlement related to large-scale development projects.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.1.4. *(2.4A)*	The operating company shall document decision-making regarding alternative mining project designs and efforts to minimize resettlement.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.1.5. *(2.4A)*	The assessment shall be made public, or, at minimum, be made available to potentially affected people and their advisors.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

2.4.2.1. *(2.4A)*	The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during: a. The assessment of displacement and resettlement risks and impacts, including the consideration of alternative mining project designs to avoid or minimize resettlement; a. The development of resettlement and livelihood options; and b. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP).		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. Resettlements that were completed prior to 2018 do not have to be assessed against 2.4.2.1.a b. Engagement for Old Mothlotlo resettlement took place, but it is not clear whether all stakeholders were involved. Meetings were aimed at providing information about resettlement and resettlement options. c. There is limited evidence for stakeholder engagement during development and implementation of the Old Mothlotlo Resettlement Action Plan (RAP). . There was a monitoring report in 2016, and a completion audit (i.e., Independent Resettlement Review (IRR) for the Old Mothlotlo project that took place in 2018. Stakeholders were involved in the evaluation of the resettlement results. It is not clear whether all affected stakeholders were involved.
2.4.2.2. *(2.4A)*	The operating company shall facilitate access, if desired by potentially affected people and communities, including host communities, to independent legal or other expert advice from the earliest stages of project design and assessment,		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. A legal advisor was retained for the Mothlotlo community from 2007-2010, working specifically with disaffected groups within the community. It is not clear if legal support was/is available for all affected households.

	through monitoring and evaluation of the resettlement process.		
2.4.2.3. *(2.4A)*	People from affected communities, including host communities, shall have access to an effective mechanism to raise and seek recourse for concerns or grievances related to displacement and resettlement.		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. There is a grievance mechanism (GM) framework developed for the operation. The GM framework is developed in a manner that meets the United Nations Guiding Principles on Business and Human Rights effectiveness criteria for GMs. Based on the outcomes of external consultations, the GM is not easily accessible to all stakeholders. Also, it was reported that the GM does not work according to the established principles. During 2023, 1 of 64 grievances recorded in the grievance log for 2023 were related to resettlement.
2.4.3.1. *(2.4A)*	When project-related displacement is deemed unavoidable, a census shall be carried out to collect appropriate socio-economic baseline data to identify the people who will be physically or economically displaced by the project and determine who will be eligible for compensation and assistance.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.3.2. *(2.4A)*	In the absence of host government procedures, the operating company shall establish compensation eligibility criteria and a cut-off date for eligibility.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

	Information regarding the cut-off date shall be well documented and disseminated along with eligibility information throughout the mining project area.		
2.4.3.3. *(2.4A)*	In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum: a. Describe how affected people will be involved in an ongoing process of consultation throughout the resettlement/livelihood restoration planning, implementation and monitoring phases; b. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people, paying particular attention to the needs of		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. A Resettlement Action Plan (RAP) was developed for the Old Mothlotlo resettlement project. a. The scope of stakeholder engagement for the Old Mothlotlo resettlement project is not fully clear. From 2003, two Section 21 Companies and associated Section 21 Committees (S21s) were established to represent the potentially affected stakeholders. Later it was agreed that the lease agreement be concluded between the Mine and the registered owners themselves. On-going consultation are being undertaken as part of the remediation of the Old Mothlotlo resettlement, initiated following monitoring report developed in 2016, and a completion audit (i.e., Independent Resettlement Review, IRR) for the Old Mothlotlo project that took place in 2018. b. The Old Mothlotlo RAP identifies potential resettlement impacts and discussed resettlement options, entitlement framework and terms of relocation that aim to minimize potential impacts of resettlement. Potential impacts on vulnerable groups were discussed, but no specific assessment was done for women. c. By 2005 (during an early stage of the resettlement) the affected communities had signed off on the resettlement process. As part

	women, the poor and vulnerable groups; c. Describe development-related opportunities and benefits for affected people and communities; d. Describe the methods used for valuing land and other assets; e. Establish the compensation framework (i.e., entitlements and rates of compensation for all categories of affected people, including host communities) in a transparent, consistent, and equitable manner; f. Include a budget and implementation schedule; and g. Be publicly available.		of this sign-off process, a compensation package was agreed. No further information on it is available. The Old Mothlotlo RAP describes potential livelihood restoration options. d. No information is available. e. By 2005 (during an early stage of the resettlement) the affected communities had signed off on the resettlement process. As part of this sign-off process, a compensation package was agreed. No further information on it is available. f. No information is available. g. The Old Mothlotlo RAP elements were disclosed to the public.
2.4.4.1. *(2.4A)*	In all cases, when people are physically displaced as a result of the development or expansion of a mine or its associated facilities: a. The operating company shall provide relocation assistance that is suited to the needs of each group of displaced peoples and is sufficient for	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

	them to improve or at least restore their standard of living at an alternative site; b. New resettlement sites built for displaced people shall offer improved living conditions; and c. Displaced people's preferences with respect to relocating in pre-existing communities and groups shall be taken into consideration and existing social and cultural institutions of the displaced peoples and any host communities shall be respected.		
2.4.4.2. *(2.4A)*	In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under national law: a. The operating company shall offer the choice of replacement property (land and assets) of at least equal value and characteristics, security of	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

	tenure, and advantages of location; and b. If cash compensation is appropriate and preferred by the affected people, compensation shall be sufficient to replace lost land and other assets at full replacement cost in local markets		
2.4.4.3. *(2.4A)*	In cases where physically displaced people have no recognizable legal right or claim to the land or assets they occupy or use, the operating company shall: a. Offer options for adequate housing with security of tenure; and b. Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the project area prior to the cut-off date for eligibility.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.5.1.	If project-related land acquisition or restrictions on land use result in	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

(2.4A)	economic displacement, regardless of whether or not the affected people are physically displaced, the operating company shall apply the following measures: a. When commercial structures are affected, the business owners shall be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment, and the employees shall be compensated for lost income; b. When affected people have legal rights or claims to land that are recognized or recognizable under national law, replacement property of equal or greater value shall be provided, or, where appropriate, cash compensation at full replacement cost; and c. Economically displaced people who are without legally recognizable claims to land shall be compensated for lost		

	assets other than land at full replacement cost.		
2.4.5.2. *(2.4A)*	All economically displaced people whose livelihoods or income levels are adversely affected shall be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living, and transitional support shall be provided based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. Additionally: a. For people whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost shall be offered as a matter of priority; b. For people whose livelihoods are natural resource-based and where project-related restrictions on access apply, continued access to affected resources or access to alternative resources with at	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

	least equivalent livelihood-earning potential and accessibility shall be provided; and c. If circumstances prevent the operating company from providing land or similar resources as described above, alternative income earning opportunities shall be provided to restore livelihoods		
2.4.6.1. *(2.4A)*	In order to be certified by IRMA, if a new project will require the displacement of indigenous peoples the operating company shall obtain the free, prior and informed consent (FPIC) of affected indigenous communities before proceeding with the resettlement and mine development (as per IRMA Chapter 2.2).	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.6.2. *(2.4A)*	If a new mine will require the displacement of non-indigenous peoples, the operating company shall make a good faith effort to negotiate agreements with all households that will be physically or economically displaced by the mining project before	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

	proceeding with the resettlement, even if the company has the legal means to acquire land or restrict land use without their consent.		
2.4.6.3. *(2.4A)*	Prior to negotiating with affected people, the operating company shall provide or facilitate access to resources necessary to participate in an informed manner. This shall include, at minimum: a. Copies of RAP and/or LRP; b. Details on what to expect at various stages of the resettlement or livelihood restoration process (e.g., when an offer will be made to them, how long they will have to respond, how to access the grievance mechanism if they wish to appeal property or asset valuations, legal procedures to be followed if negotiations fail); and c. Independent legal experts or others to ensure that affected people understand the content of any proposed agreement and associated information.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

2.4.6.4. *(2.4A)*	In cases where affected people reject compensation offers that meet the requirements of this chapter and, as a result, expropriation or other legal procedures are initiated, the operating company shall explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring to mitigate the risk of impoverishment of those affected people.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.6.5. *(2.4A)*	Forced evictions shall not be carried except in accordance with law and international best practice, and the requirements of this chapter.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.
2.4.6.6. *(2.4A)*	The operating company shall take possession of acquired land and related assets only after compensation has been made available, and, where applicable, resettlement sites and moving allowances have been provided to the displaced people.	—	Resettlements that were completed prior to 2018 do not have to be assessed against this requirement.

2.4.6.7. *(2.4A)*	The operating company shall document all transactions to acquire land rights, and all compensation measures and relocation activities.		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. Limited information is available regarding the tracking of compensation for the Old Mothlotlo resettlement. The mine has documented entitlements calculated per each affected individual, including hardship and inconvenience, transition allowance, compensation, assistance with move and trust fund access. No information about the implementation of the outlined compensation framework was available.
2.4.7.1. *(2.4A)*	**Critical** The operating company shall establish and implement procedures to monitor and evaluate the implementation of a Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP), and take corrective action as necessary until the provisions of the RAP/LRP and the objectives of this chapter have been met.		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. As it was mentioned above, although a Resettlement Action Plan (RAP) was initiated for the Old Mothlotlo resettlement project, it was not kept up to date or completed, and was thus not actively used as a tool to guide the planning or implementation of the process. No reports with results pf the monitoring of Old Mothlotlo resettlement were developed. In 2018, a Mogalakwena Resettlement Review Report indicated a need for regular monitoring of resettlement plans and outlined a list of recommendations to address identified gaps. This independent resettlement review resulted in a remediation plan developed in 2019. Since the Stage 2 audit, the Mine subsequently explained that the 2018 Mogalakwena Resettlement Review Report is considered a completion date for historical resettlement. Independent

feedback and resettlement planning is provided in the 2019 remediation plan.

Based on the 2019 plan, the Mine indicates ongoing and transitional support are in place while full development of remedial entitlements and other forward-looking programs for relocating communities are progressed, including water provision and sanitation infrastructure. Target community re-engagement is scheduled to commence in early 2025, for completion during the calendar year. By 2026, the Mine expects to have completed resettlement plans implemented with feedback from communities beginning.

With respect to a Stage 2 finding that information was not provided on implementation of identified recommendations for the Old Mothlotlo resettlement process, the Mine indicates that this plan is nearing completion and additional work is underway with full implementation anticipated. Actions completed include disclosure of the findings of historical independent resettlement reviews (IRRs) for Ga-Pila (2001), Ga-Puka (and Ga-Sekhaolelo resettlements (2008-2013) (communities relocated as part of the Old Mothlotlo resettlement process) and the associated Anglo American Platinum process and remediation strategy for these communities. Actions not commenced or in-progress include development of remedial entitlement framework and agreement, in consultation with impacted communities; community endorsement of the entitlement framework; delivery of medium to long-term remedial entitlements and monitoring and evaluation of implementation of entitlement agreements (2025-2030).

Mogalakwena explains that historical resettlement planning was undertaken without a dedicated team of subject matter specialists

			or well-defined policies and procedures governing implementation of frameworks or collaboration with impacted communities. Resettlement from 2020 onward are treated as capital investment projects with defined “stage gates” and external compliance reviews. Significantly improved processes are based on lessons learned, that include more robust governance in conformance with Anglo American Social Way 3.0 social management requirements and Land Access Displacement and Resettlement (LADAR) processes. The Mine reports that LADAR complies with international resettlement standards for financial performance and human rights and IRMA requirements. Anglo American’s intention is to bring older historical resettlements up to the standards of Social Way 3.0. The Mine acknowledges gaps exist in the implementation of the Old Mothlotlo Resettlement Action Plan (RAP).
2.4.7.2. *(2.4A)*	Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP.		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. Old Mothlotlo Resettlement Action Plan (RAP) was developed in 2013, following monitoring report was developed in 2016, and a completion audit (i.e., Independent Resettlement Review, IRR) in 2018.Old Mothlotlo RAP included considerations for stakeholder engagement during RAP implementation, but there is no evidence whether those considerations were implemented. No evidence on the specific reporting to stakeholders on the full implementation of the resettlement action plan is available. Extensive engagement was completed to assess RAP implementation during the IRR/Completion audit, following this the findings of the IRR in terms of status of RAP implementation

			was disclosed to authorities and affected communities. It is not clear whether all potentially affected groups were engaged. No evidence of the disclosure of the RAP results is available.
2.4.7.3. *(2.4A)*	Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company: a. Shall retain competent professionals to verify the operating company's monitoring information and provide advice on additional steps needed to achieve compliance with the requirements of this chapter; and b. Shall commission a completion audit that: i. Occurs after the company deems that its RAP/LRP has been fully and successfully implemented; ii. Is carried out by external resettlement experts; iii. Includes, at a minimum, a review of the mitigation measures implemented by the operating company, a comparison of implementation		Based on timing guidance in the IRMA standard, this requirement was assessed for Old Mothlotlo resettlement actions. In 2018 Mogalakwena Resettlement Review Report was developed, outlining a list of recommendations to address identified gaps in the Old Mothlotlo resettlement process. No information is available on the implementation of the identified recommendations. a. The report was developed by SYNERGY / NOMAD, an external resettlement expert. b. i. The report was developed after the resettlement was completed. ii. It was carried by external resettlement experts. iii. The report outlines gaps in the outcomes of the resettlement. iv. There is no evidence that the report was made available to affected stakeholders.

	outcomes against the requirements of this chapter, and a determination as to whether the commitments made in the RAP/LRP have been delivered and the monitoring process can therefore be terminated; and iv. Is made available to affected people and their advisors.		
2.4.8.1. *(2.4A)*	Where land acquisition and resettlement are the responsibility of the government, the operating company shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this chapter.	—	Land acquisition and resettlement are the responsibility of the mine.
2.4.8.2. *(2.4A)*	The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the operating company shall prepare a supplemental plan that, together with the documents prepared by the responsible government agency, shall address the relevant requirements of	—	Land acquisition and resettlement are the responsibility of the mine.

this chapter. The company shall include in its supplemental plan, at a minimum:

a. Identification of affected people and impacts;

b. A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations;

c. The supplemental measures to achieve the requirements of this chapter in a manner that is permitted by the responsible agency and an implementation schedule; and

d. The financial and implementation responsibilities of the operating company in the execution of its supplemental plan.

Chapter 2.4B—Resettlement

IRMA provides additional guidance on applying this chapter in the IRMA Standard for Responsible Mining 1.0–Guidance Document, Version 1.2. This guidance specifically addresses resettlements based on when they were completed. This guidance distinguishes between new mines (where operations began after the IRMA standard was first published in June 2018) and existing mines (where operations began before 2018). For the purpose of this determination, "complete" was interpreted to mean the physical relocation activities were complete even if mitigation, monitoring and corrective action were not yet complete or might even still be ongoing.

- Resettlements completed prior to April 30, 2006 are not audited against the chapter; however, IRMA requires that residual human rights impacts related to resettlement be included in Chapter 1.3, and issues related to access to grievance of ongoing concerns be included in Chapter 1.4.
- Resettlements completed after April 30, 2006 are audited against a subset of this chapter, recognizing that existing mines may not have followed all of the best practices laid out in Chapter 2.4, e.g., because resettlement occurred before these practices were well defined or widely applied, or they may not have kept the data or documentation or have institutional knowledge to demonstrate that certain practices took place. Consequently, certain requirements will either not be able to be verified or can no longer be met (or is of little or no value to do so) by some existing mines. These requirements can be marked as "not relevant," which means the requirements will not be factored into the chapter score.
- Resettlements completed at new mines are audited against the full chapter.
- Resettlements related to proposed changes at existing mines (e.g., resettlement proposed after 2018) are audited against the full chapter.

In the case of Mogalakwena, the mine has conducted or proposed resettlement actions that fall into several of the above scenarios and it proved difficult to assign a single performance rating for resettlements held to different standards. As a result, the auditors have assessed this chapter twice; once to capture the older resettlement that are subject to only a limited set of requirements and again to capture resettlements proposed or completed after 2018 that are subject to the full chapter. These are assessed in this report as Chapter 2.4A (older resettlement) and Chapter 2.4B. A summary of the relevant resettlements included in each chapter is provided. This two-chapter approach is consistent with the proposed revisions to the IRMA standard (not yet published).

Background on Resettlements Covered by Chapter 2.4B:

Chapter 24B focuses on the planned/ongoing resettlements, including implementation of the 2018 Mothlotlo resettlement action plan (a new phase of Old Mothlotlo resettlement) and several planned resettlements (Phase 2 Skimming and Leruleng,

Solar Photovoltaic (PV) Project, Seritarita School). Since the on-site assessment, the mine has informed the audit team that they are no longer proceeding with the Solar Photovoltaic (PV) project resettlement process as the targeted land will not be used for this project.

The new phase of the Old Mothlotlo resettlement was planned by 2013, physical resettlement started in 2019 and continues to the present day.

Planned resettlements have not started yet, Livelihood Restoration Plan/Resettlement Action Plan have been developed for some of them (Livelihood Restoration Plan is being developed for Skimming and Leruleng and an outline of the Resettlement Action Plan (RAP) was developed for Solar Photovoltaic resettlement).

In accordance with the IRMA Standard requirements, Chapter 2.4B presents an assessment of the planned/ongoing resettlements that were completed after 2018 or that are ongoing; this includes an assessment against all the requirements.

Chapter 2.4. (B) - Resettlement			Basis for rating
2.4.1.1. *(2.4B)*	If there is the potential that a new mine (including associated facilities) or the expansion of an existing mine or associated facilities may require land acquisition that could result in the involuntary resettlement (for the remainder of this chapter, referred to simply as resettlement) of people, the operating company shall undertake an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people.		Here and throughout Chapter 2.4B: based on timing guidance in the IRMA standard, the Chapter 2.4B requirements were assessed for the on-going Mothlotlo resettlement and several planned resettlements (Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). Since the on-site assessment, the mine has informed the audit team that they are no longer proceeding with the Solar Photovoltaic (PV) project resettlement process as the targeted land will not be used for this project. The mine operations were involved in a historical resettlement (Old Mothlotlo) that started in 2002, and physical **relocation** was completed in 2007-2009. Old Mothlotlo is assessed in Chapter 24A. This Chapter 2.4B focuses on an on-going resettlement (Mothlotlo resettlement) and several planned resettlements (Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School).

			Impacts were assessed for all resettlement processes. It is not clear whether all relocated households were captured through these risk assessments, although all potential impacts were analyzed. Resettlement Action Plans (RAPs) and compensation frameworks for Mothlotlo resettlement that are available for review include different numbers of affected land users in different documents. Therefore, it is difficult to verify whether all stakeholders were considered at each step of the Mothlotlo resettlement. A census was carried out for the ongoing and planned resettlement projects (Mothlotlo resettlement, Solar PV, Skimming and Leruleng Phase 2) with an example of the survey and database provided. An assessment of impacts for the planned resettlement processes (Phase 2 Skimming and Leruleng, Solar PV, Seritarita School) was performed in the form of a 3C social and human rights impact and risk analysis (SHIRA). RAP developed for the Mothlotlo resettlement includes an overview of potential risks and impacts, and relevant mitigation measures.
2.4.1.2. *(2.4B)*	The assessment shall: a. Be undertaken during the early stages of mining project planning; b. Include identification of alternative mining project designs to avoid, and if that is not possible, minimize the displacement of people; c. Identify and analyze the social, cultural, human rights, conflict, environmental and economic risks and impacts to displaced		a. There is evidence of the assessment at the early stage of resettlement for the planned resettlement processes (Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). An impact assessment for the Mothlotlo resettlement was developed after resettlement had already started. b. For the planned resettlement projects, resettlement options (and as a result alternative mining designs) were analyzed as part of the resettlement framework and discussed during a meeting with stakeholders (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). The Environmental Impact Assessment (EIA) includes consideration of alternative mining project designs. There is no evidence that resettlement options were considered during the Mothlotlo resettlement process.

	persons and host communities for each project design alternative, paying particular attention to potential impacts on women, children, the poor and vulnerable groups; and d. Identify measures to prevent and mitigate risks and impacts, and estimate the costs of implementing the measures.		c. Resettlement alternatives were analyzed to some extent for the planned resettlement (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). No specific analysis of alternatives with a focus on impacts on vulnerable groups was carried out. There is no evidence that alternative mining designs were considered for the Mothlotlo resettlement. d. A formal resettlement action plan/livelihood restoration plan with a list of measures and budget planned is not finalized yet for the planned resettlements (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). The Mothlotlo resettlement action plan includes identification of mitigation measures and budget planned, but it is not clear whether this resettlement action plan is applicable to all Mothlotlo resettled households.
2.4.1.3. *(2.4B)*	The assessment shall be undertaken by competent professionals with experience in resettlement related to large-scale development projects.		Resumes and a description of the qualifications of the contractors involved are provided for all on-going/planned resettlement projects.
2.4.1.4. *(2.4B)*	The operating company shall document decision-making regarding alternative mining project designs and efforts to minimize resettlement.		An Environmental Impact Assessment for Mogalakwena Mine (2019) includes consideration of alternative mining project designs. Resettlement alternatives were analyzed for the planned resettlement (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). There is no evidence that resettlement options were considered specifically during the Mothlotlo resettlement process.
2.4.1.5.	The assessment shall be made public, or, at minimum, be made available to		Some results of the resettlement assessments were shared with stakeholders. A stakeholder engagement plan (SEP) was developed for the planned resettlement projects. Meetings with affected

(2.4B)	potentially affected people and their advisors.		stakeholders for the planned resettlement projects were planned and held (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). Ongoing stakeholder engagement takes place for the Mothlotlo resettlement. Through the engagements described above some information was provided to stakeholders. There is no evidence that results of the assessment of potential resettlement impacts were specifically shared with stakeholders. Some communities highlighted receiving short notice of meetings related to relocation of Seritarita High School and not receiving agendas for the meetings ahead of the time.
2.4.2.1. *(2.4B)*	The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during: a. The assessment of displacement and resettlement risks and impacts, including the consideration of alternative mining project designs to avoid or minimize resettlement; b. The development of resettlement and livelihood options; and		The stakeholder engagement plan was developed for the planned resettlement projects (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). Meetings with affected stakeholders were planned and held for all resettlement projects. For the Mothlotlo resettlement, a Stakeholder Engagement Plan for the Monitoring and Evaluation framework was developed in 2023. Since the actions were planned to start in December 2023, they were not verified through the audit. a. Relevant consultations were carried out for all resettlement projects. It is not clear whether consultations involved all affected stakeholders. Mining alternative designs were presented as part of the Environmental Impact Assessment (EIA) disclosure. b. There is evidence of resettlement-related data being disclosed to stakeholders for three planned resettlement projects (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). There is evidence of engagement for Mothlotlo resettlement, including discussion of the resettlement action plans/livelihood restoration plans (RAP/LRP). Meetings were aimed at providing information about resettlement and resettlement options.

	c. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP).		Some communities highlighted receiving short notice of meetings related to relocation of Seritarita High School and not receiving an agenda for the meetings ahead of the time. c. Stakeholder engagement during the development of the resettlement action plans/livelihood restoration plans (RAP/LRP) for Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School is described above (b). There is limited evidence for stakeholder engagement during monitoring and evaluation of the RAP/LRP for the Mothlotlo project. Stakeholders were involved in the evaluation of the resettlement results. It is not clear whether all affected stakeholders were involved.
2.4.2.2. *(2.4B)*	The operating company shall facilitate access, if desired by potentially affected people and communities, including host communities, to independent legal or other expert advice from the earliest stages of project design and assessment, through monitoring and evaluation of the resettlement process.		Evidence of access to independent legal or other expert advice is available for all resettlement projects. It is not clear if legal support was/is available for all affected households. No meeting notes are available that list all stakeholders.
2.4.2.3. *(2.4B)*	People from affected communities, including host communities, shall have access to an effective mechanism to raise and seek recourse for concerns or grievances related to displacement and resettlement.		There is a grievance mechanism (GM) framework developed for the operation, that is available for all resettlement projects, as well as a specific grievance process flow was implemented for Phase 2 Skimming and Leruleng resettlement project. The GM framework is developed in a manner that meets the United Nations Guiding Principles on Business and Human Rights effectiveness criteria for GMs. Based on the outcomes of external consultations, the GM is not easily accessible to all stakeholders. Also, it was reported that the GM does not work according to the established principles. During

			2023, 1 of 64 grievances recorded in the grievance log for 2023 were related to resettlement.
2.4.3.1. *(2.4B)*	When project-related displacement is deemed unavoidable, a census shall be carried out to collect appropriate socio-economic baseline data to identify the people who will be physically or economically displaced by the project and determine who will be eligible for compensation and assistance.		A census was carried out for the ongoing and planned resettlement projects (Mothlotlo resettlement, Solar PV, Skimming and Leruleng Phase 2) with an example of the survey and database provided.
2.4.3.2. *(2.4B)*	In the absence of host government procedures, the operating company shall establish compensation eligibility criteria and a cut-off date for eligibility. Information regarding the cut-off date shall be well documented, and disseminated along with eligibility information throughout the mining project area.		Compensation eligibility criteria and a cut-off date for eligibility were established for Mothlotlo resettlement. Some sub-projects of the planned resettlement (in particular, Solar PV and Skimming and Leruleng Phase 2) have established eligibility criteria and a cut-off date for eligibility. Limited information is available on how this information was distributed among affected stakeholders. No relevant notes were available for review.
2.4.3.3. *(2.4B)*	In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed.		A Resettlement Action Plan (RAP) was developed for the Mothlotlo resettlement. A Livelihood Restoration Plan (LRP)is being developed for Skimming and Leruleng (2022-ongoing). Outline of the RAP was developed for Solar PV resettlement. No information is available for Seritarita School resettlement. a. The Mothlotlo RAP includes considerations for on-going consultations. A stakeholder engagement plan was developed for the planned resettlement that defines engagements required to

In either case, these plans shall, at a minimum: a. Describe how affected people will be involved in an ongoing process of consultation throughout the resettlement/livelihood restoration planning, implementation and monitoring phases; b. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people, paying particular attention to the needs of women, the poor and vulnerable groups; c. Describe development-related opportunities and benefits for affected people and communities; d. Describe the methods used for valuing land and other assets; e. Establish the compensation framework (i.e., entitlements and rates of compensation for	support the resettlement process (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). The Skimming and Leruleng LRP includes regular consultations with affected stakeholders b. The Mothlotlo RAP includes identified mitigation measures to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people. The Mothlotlo RAP analyses potential effects to vulnerable groups. The Skimming and Leruleng LRP includes identification of potential effects and consideration of several compensation and livelihood restoration options. No information was available for Solar Photovoltaic (PV) Project, and Seritarita School. c. As part of the Mothlotlo RAP, development-related opportunities and benefits are described within the compensation framework. The Skimming and Leruleng LRP includes consideration of several compensation and livelihood restoration options. No information was available for Solar Photovoltaic (PV) Project, and Seritarita School. d. The Mothlotlo RAP includes a valuation methodology that is provided within the plan. A compensation framework was established for all plans (including RAP for the Mothlotlo resettlement, an LRP for Skimming and Leruleng, and outline of the RAP for Solar PV resettlement). A budget was developed for the Mothlotlo resettlement project. For the planned projects, a budget has not been developed yet (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). e. The Mothlotlo RAP includes a compensation framework, in particular three main categories of entitlements and rates of compensation. The Skimming and Leruleng LRP includes an entitlement framework. No information was available for Solar Photovoltaic (PV) Project, and Seritarita School. f. The Mothlotlo RAP includes a budget and implementation schedule. The Mothlotlo RAP includes some gaps. There is no evidence that those gaps were addressed. The budget and

	all categories of affected people, including host communities) in a transparent, consistent, and equitable manner; f. Include a budget and implementation schedule; and g. Be publicly available.		implementation schedule for the planned resettlement projects has not been developed yet. No information was available for Solar Photovoltaic (PV) Project, and Seritarita School. g. There is no evidence that any developed RAPs or LRPs were publicly available. At the same time, during meetings with stakeholders, all project resettlement options are discussed.
2.4.4.1. *(2.4B)*	In all cases, when people are physically displaced as a result of the development or expansion of a mine or its associated facilities: a. The operating company shall provide relocation assistance that is suited to the needs of each group of displaced peoples and is sufficient for them to improve or at least restore their standard of living at an alternative site; b. New resettlement sites built for displaced people shall offer improved living conditions; and c. Displaced people's preferences with respect to relocating in pre-existing communities and		A Resettlement Action Plan (RAP)was developed for the Mothlotlo resettlement project and was updated in 2018 (not available for review), as well as compensation strategies were updated. A Livelihood Restoration Plan (LRP)is being developed for Skimming and Leruleng (2022-ongoing). Outline of the RAP was developed for Solar PV resettlement. No information is available for Seritarita School resettlement. a. Relocation assistance was described as part of the compensation framework of the RAP for the Mothlotlo resettlement. There are no reports providing evidence of relocation assistance being provided to stakeholders during the Mothlotlo resettlement, although no concerns were raised by stakeholders regarding this during the Stage 2 IRMA audit. No information regarding relocation assistance is available for Skimming and Leruleng, Solar Photovoltaic (PV) Project, and Seritarita School. b. Based on the evidence available, for the Mothlotlo resettlement displaced people were offered improved living conditions according to the established compensation framework. At the same time, some of the interviewed external stakeholders of the Mothlotlo resettlement raised concerns regarding the relocation options that they were offered. (In some cases, the compensation that they had received was not aligned with the agreed compensation

	groups shall be taken into consideration and existing social and cultural institutions of the displaced peoples and any host communities shall be respected.		conditions.) Limited written evidence is available to support whether stakeholders were promised any specific compensation conditions in addition to the ones established in the RAPs. Planned resettlements (e.g. Solar PV RAP) includes options for the owners to choose from – either cash compensation or alternative housing/business plots. c. Relocation options were discussed with the owners affected by the Mothlotlo resettlement through relevant survey and valuation process. Planned resettlements (e.g. Solar PV RAP) includes options for the owners to choose from – either cash compensation or alternative housing/business plots.
2.4.4.2. *(2.4B)*	In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under national law: a. The operating company shall offer the choice of replacement property (land and assets) of at least equal value and characteristics, security of tenure, and advantages of location; and b. If cash compensation is appropriate and preferred by the affected people, compensation shall be		a. For the Mothlotlo project, affected stakeholders were provided options for replacement housing. The choice of replacement housing was dependent on the total footage of housing occupied by the affected stakeholders. According to the Mothlotlo Resettlement Action Plan (RAP), the choice of replacement property (land and assets) was of equal value and characteristics, security of tenure, and advantages of location compared to the original housing. At the same time, not all stakeholders agreed that replacement property (land and assets) was of equal value and characteristics. Some stakeholders noted that proposed housing was of a smaller footage, or only one house was provided instead of several houses. Planned resettlements (e.g. Solar Photovoltaic (PV) RAP) includes options for the owners to choose from – either cash compensation or alternative housing/business plots. b. Compensation for the loss of assets other than land was calculated at full replacement cost for the Mothlotlo RAP. Later, based on the feedback provided by stakeholders, a completion audit was developed that revealed that compensation options were

	sufficient to replace lost land and other assets at full replacement cost in local markets		not sufficient. The next step for the completion audit is to identify additional livelihood restoration options. Planned resettlements (e.g. Solar PV RAP) states that cash compensation shall be equivalent to the value of a comparable serviced stand elsewhere in the area.
2.4.4.3. *(2.4B)*	In cases where physically displaced people have no recognizable legal right or claim to the land or assets they occupy or use, the operating company shall: a. Offer options for adequate housing with security of tenure; and b. Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the project area prior to the cut-off date for eligibility.		Compensation frameworks are applicable for owners/users with various legal rights, who were confirmed to be permanently living within the resettled villages. According to the legislation of South Africa (the Interim Protection of Informal Land Rights Act / Act 31 of 1996 (IPILRA)), those who hold informal rights to land are subject to legal protection from loss of their rights in land. a. For Mothlotlo project, affected stakeholders were provided options of replacement housing. The choice of replacement housing was dependent on the total footage of housing occupied by the affected stakeholders. According to the Resettlement Action Plan (RAP), the choice of replacement property (land and assets) was of equal value and characteristics, security of tenure, and advantages of location compared to the original housing. At the same time, some stakeholders noted that proposed housing was of a smaller footage or only one house was provided instead of several houses. Planned resettlements (e.g. Solar PV RAP) includes options for the owners to choose from – either cash compensation or alternative housing/business plots. b. Compensation for the loss of assets other than land was calculated at full replacement cost for the Mothlotlo RAP. Later, based on the feedback provided by stakeholders, a completion audit was developed that revealed that compensation options were not sufficient. The next step for the completion audit is to identify additional livelihood restoration options. Planned resettlements (e.g. Solar PV RAP) states that cash compensation shall be equivalent to the value of a comparable serviced stand elsewhere in the area.

2.4.5.1. *(2.4B)*	If project-related land acquisition or restrictions on land use result in economic displacement, regardless of whether or not the affected people are physically displaced, the operating company shall apply the following measures: a. When commercial structures are affected, the business owners shall be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment, and the employees shall be compensated for lost income; b. When affected people have legal rights or claims to land that are recognized or recognizable under national law, replacement property of equal or greater value shall be provided, or, where appropriate, cash compensation at full replacement cost; and		a. Requirements for business owners were not specifically outlined in the Mothlotlo Resettlement Action Plan (RAP). The Skimming and Leruleng Livelihood Restoration Plan (LRP)discusses options of resettlement for business owners. The LRP is not finalized yet. b. The Mothlotlo RAP outlines compensation options for the land owned by affected stakeholders. This includes providing alternative grazing lands and cash compensation at full replacement cost c. Compensation frameworks are applicable for owners/users with various legal rights, who were confirmed to be permanently living within the resettled villages. Therefore, the conditions of the previous section are applicable to those as well.

	c. Economically displaced people who are without legally recognizable claims to land shall be compensated for lost assets other than land at full replacement cost.		
2.4.5.2. *(2.4B)*	All economically displaced people whose livelihoods or income levels are adversely affected shall be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living, and transitional support shall be provided based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. Additionally: a. For people whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost shall be offered as a matter of priority; b. For people whose livelihoods are natural resource-based and where project-related		a. For the Mothlotlo resettlement, agricultural land-related compensation was proposed. Based on the feedback received from stakeholders, the options provided did not actually equal the full replacement cost. Therefore, the “Independent Resettlement Review Feedback & Remediation Plan 2022” was developed to identify further options to compensate those who were relocated. Livelihood Restoration initiatives are planned for the Mothlotlo resettlement project as a follow up of the resettlement review. A Livelihood Restoration Plan (LRP)is being developed for Skimming and Leruleng (2022-ongoing), that identifies ways for livelihood restoration for affected communities and includes a discussion of alternative income earning opportunities. b. For the Mothlotlo resettlement, some alternative livelihood restoration options were suggested, including work at the mine. Based on the feedback received from stakeholders, livelihood restoration support was not always available. The “Independent Resettlement Review Feedback & Remediation Plan 2022” was developed to identify further options to compensate those who were relocated. The Skimming and Leruleng LRP includes a wider compensation framework aimed at livelihood restoration options compared to the Mothlotlo resettlement. c. For the Mothlotlo resettlement, the mine was planning to provide land plots and support for other livelihood restoration options. Based on the feedback received from stakeholders, livelihood restoration support was not always available. The Skimming and

	restrictions on access apply, continued access to affected resources or access to alternative resources with at least equivalent livelihood-earning potential and accessibility shall be provided; and c. If circumstances prevent the operating company from providing land or similar resources as described above, alternative income earning opportunities shall be provided to restore livelihoods		Leruleng LRP includes a discussion of alternative income earning opportunities as part of discussion with stakeholders.
2.4.6.1. *(2.4B)*	In order to be certified by IRMA, if a new project will require the displacement of indigenous peoples the operating company shall obtain the free, prior and informed consent (FPIC) of affected indigenous communities before proceeding with the resettlement and mine development (as per IRMA Chapter 2.2).		No Indigenous peoples were identified for the project.
2.4.6.2.	If a new mine will require the displacement of non-indigenous peoples, the operating company shall		Resettlement agreements were reached with the Mothlotlo community as part of Mothlotlo resettlement process. There was not enough evidence to verify whether this agreement covers all affected stakeholders. A Resettlement Action Plan (RAP)and

(2.4B)	make a good faith effort to negotiate agreements with all households that will be physically or economically displaced by the mining project before proceeding with the resettlement, even if the company has the legal means to acquire land or restrict land use without their consent.		compensation frameworks for the historical resettlement that are available for review include different numbers of affected land users in different documents for the same resettlement projects. Therefore, it is hard to verify whether all stakeholders were considered at each step of historical resettlement. Agreements for the planned resettlements were not developed yet (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School).
2.4.6.3. *(2.4B)*	Prior to negotiating with affected people, the operating company shall provide or facilitate access to resources necessary to participate in an informed manner. This shall include, at minimum: a. Copies of RAP and/or LRP; b. Details on what to expect at various stages of the resettlement or livelihood restoration process (e.g., when an offer will be made to them, how long they will have to respond, how to access the grievance mechanism if they wish to appeal property or asset valuations, legal procedures to be followed if negotiations fail); and		a. There is no evidence whether the Resettlement Action Plans/Livelihood Restoration Plans (RAPs/LRPs) copies were provided to stakeholders for Mothlotlo resettlement; at the same time engagement with stakeholders took place, including regular meetings and data sharing. SEP (Stakeholder engagement plan) was developed for Mothlotlo LRP implementation and includes steps for information sharing related to RAPs/LRPs. Details of the Skimming and Leruleng livelihood restoration plan were communicated to stakeholders before the resettlement process. b. There is limited evidence that information about various stages of the resettlement and livelihood restoration process of the Mothlotlo resettlement was shared fully with stakeholders. Meeting notes are available, suggesting that some details of this process were shared with stakeholders. Details of the Skimming and Leruleng livelihood restoration plan were communicated to stakeholders before the resettlement process. c. Legal expert was involved at the Mothlotlo resettlement process. Legal expert was involved in providing information to affected communities for the Skimming and Leruleng livelihood restoration plan.

	c. Independent legal experts or others to ensure that affected people understand the content of any proposed agreement and associated information.		
2.4.6.4. *(2.4B)*	In cases where affected people reject compensation offers that meet the requirements of this chapter and, as a result, expropriation or other legal procedures are initiated, the operating company shall explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring to mitigate the risk of impoverishment of those affected people.		As part of the Mothlotlo resettlement, there are several households that rejected relocation options and refused to relocate. For the Mothlotlo resettlement, there is evidence of negotiation with the Pakgadi household where a joint agreement was discussed. An Anglo American letter to local authorities seeking mediation of a communication with affected owners was provided for review. Both examples show that operation collaborates with local authorities and looks for other ways to negotiate with affected stakeholders. It is not evident whether planned resettlement processes that involve households that refuse to relocate will also include collaboration with the responsible government agency (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School).
2.4.6.5. *(2.4B)*	Forced evictions shall not be carried except in accordance with law and international best practice, and the requirements of this chapter.		The “Land Access and Displacement Strategy 2021” and the “Displacement Framework- March 2021” and the Mothlotlo Resettlement Action Plan (RAP)were developed based on International Finance Corporation (IFC) requirements that prohibit forced evictions. No such cases were recorded (based on external and internal interviews).

2.4.6.6. *(2.4B)*	The operating company shall take possession of acquired land and related assets only after compensation has been made available, and, where applicable, resettlement sites and moving allowances have been provided to the displaced people.		No written evidence is available for this requirement for Mothlotlo resettlement and planned resettlements. At the same time no relevant comments that suggest that the mine took possession of acquired land and related assets before compensation was made available were received from affected stakeholders.
2.4.6.7. *(2.4B)*	The operating company shall document all transactions to acquire land rights, and all compensation measures and relocation activities.		Limited information is available regarding the tracking of compensation or requirements for tracking compensation transactions for the Mothlotlo resettlement and planned resettlements (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School). For the Mothlotlo resettlement, census data per households is available, but information regarding providing compensations was not available for a review. Resettlement documents developed for the planned resettlements (e.g. for Solar PV resettlement) do not include this requirement.
2.4.7.1. *(2.4B)*	**Critical** The operating company shall establish and implement procedures to monitor and evaluate the implementation of a Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP), and take corrective action as necessary until the provisions of the RAP/LRP and the objectives of this chapter have been met.		The Mothlotlo Resettlement Action Plan (RAP)and the Skimming and Leruleng Livelihood Restoration Plan (LRP) set goals of developing monitoring and evaluation (M&E) processes. M&E procedures have been developed for both Mothlotlo and Skimming and Leruleng resettlement processes. Implementation of the Mothlotlo M&E will commence in 2025, whereas M&E for Skimming will only commence once implementation commences. Corrective actions as part of the Mothlotlo M&E were not developed yet. Goals for the Skimming and Leruleng RAP see have also not been realized. An LRP for Mothlotlo was completed in Q2 2024. An associated plan for Extension 14 (from Mothlotlo) was finalized in Q3

			2024. Mogalakwena also cited examples of community feedback and engagement and information-sharing with non-governmental organizations that have expressed concerns regarding resettlement planning. During verification audit engagement the audit team met with a group of traditional leaders and community members from Skimming. The meeting, facilitated by the non-governmental organization mentioned above, expressed general disappointment in the implemented resettlement process for this community to date. An additional planned engagement meeting in the neighbouring community of Sekuruwe did not occur.
2.4.7.2. *(2.4B)*	Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP.		The mine has regular meetings with stakeholders. The stakeholder engagement plan was developed to support regular engagement as part of the Mothlotlo resettlement. Implementation of Resettlement Action Plans/Livelihood Restoration Plans (RAPs/LRPs) is reported to stakeholders during meetings focused on RAP/LRP implementation. No evidence on the specific reporting to stakeholders on the full implementation of the resettlement action plan is available. No evidence of the disclosure of the RAP/LRP results is available.
2.4.7.3. *(2.4B)*	Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company: a. Shall retain competent professionals to verify the operating company's monitoring information and provide advice on additional steps needed to achieve compliance with the		Resettlement processes associated with the mine may pose a risk of significant adverse social impacts. a. Mothlotlo Resettlement Action Plan (RAP)and resettlement frameworks for planned resettlements establish procedures to monitor and evaluate the implementation of a RAP and Livelihood Restoration Plan (LRP) and take corrective action as necessary. There is no information available that competent resettlement professionals are involved to provide advice on compliance with international standards regarding resettlement and to verify the monitoring information when it is available.

requirements of this chapter; and b. Shall commission a completion audit that: i. Occurs after the company deems that its RAP/LRP has been fully and successfully implemented; ii. Is carried out by external resettlement experts; iii. Includes, at a minimum, a review of the mitigation measures implemented by the operating company, a comparison of implementation outcomes against the requirements of this chapter, and a determination as to whether the commitments made in the RAP/LRP have been delivered and the monitoring process can therefore be terminated; and iv. Is made available to affected people and their advisors.		b. Planned and ongoing resettlements are not completed yet. This sub-requirement is considered not relevant as a completion audit cannot be conducted until resettlement is complete. Planned resettlements are not completed yet (this includes Phase 2 Skimming and Leruleng, Solar Photovoltaic (PV) Project, Seritarita School).

2.4.8.1. *(2.4B)*	Where land acquisition and resettlement are the responsibility of the government, the operating company shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this chapter.	—	Land acquisition and resettlement are the responsibility of the mine.
2.4.8.2. *(2.4B)*	The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the operating company shall prepare a supplemental plan that, together with the documents prepared by the responsible government agency, shall address the relevant requirements of this chapter. The company shall include in its supplemental plan, at a minimum: a. Identification of affected people and impacts; b. A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations;	—	Land acquisition and resettlement are the responsibility of the mine.

c. The supplemental measures to achieve the requirements of this chapter in a manner that is permitted by the responsible agency and an implementation schedule; and

d. The financial and implementation responsibilities of the operating company in the execution of its supplemental plan.

Chapter 2.5—Emergency Preparedness and Response		Basis for Rating
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 *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining.	The site used a standard template for the emergency management plan, which was developed according to industry standards and has been mapped against IRMA requirements. During internal review, an additional alignment check was performed. Plans were reviewed against the relevant requirements but not documented on a 1:1 basis. Inundation maps were recently updated. Currently, they have a generic emergency response plan that addresses all top 5 community emergency scenarios (dam failure, road accident, fires, hazmat spill, flooding), plus atmospheric releases, blasting and other incidents. There are other specific community response plans for issues unique to specific communities, such as community-specific tailing storage facility inundation. Following Stage 1, improved mapping of the current plan to United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (UN APELL) was completed and documented. The site created a checklist for the UN APELL requirements and conducted an evaluation of the emergency preparedness plan (ERP). Auditors identified that the ERP did not sufficiently cover requirements for potential community emergencies to be identified and incorporated. Subsequent actions included: - Consultation with communities to identify the hazards of most significance to them. The top items identified were tailings failure, floods/heavy rains, lack of trained first aiders in the communities, and fire. - Development of a multistakeholder community emergency preparedness drill evacuation plan.

- External endorsement and participation in drills from 15 traditional leaders of affected villages (most affected in potential inundation zone.)

- Monthly engagements in affected communities through posters, pamphlets, community meetings, etc.

- The mine recruited 75 community Emergency Management Personnel (EMP)s (mostly youths) and put them through external accredited disaster management training, including basic firefighting and first aid. A WhatsApp group and other forums were established for EMP's to collaborate.

- Tailings facility visits were conducted for community leaders and EMPs to enhance their understanding of tailings storage facility (TSF) operation, risks and the controls in place.

- Vulnerable groups and related needs were identified, including some elderly, farmers and cattle who may require evacuation assistance, if applicable.

- Involved community leaders, community EMP's and external support to develop evacuation routes, evacuation points, and other relevant parts of emergency response plans. They also involved schools, local police, taxi association, provincial and district disaster management departments.

Auditors noted that emergency communication plans all required several steps before communities would be alerted. The related scenarios were all predicated on the assumption that there would be warning signs, such as leaks or bulges, prior to a tailings storage facility or dam failure. While this may be the most credible and likely scenario, there was no fast-response path identified for a sudden tailing storage facility failure. The mine has since installed extra sirens, covering the six most villages which would be first impacted by a TSF failure, and has plans to install more.

The mine is using worst-case precipitation to model flooding (including impact on TSFs). Also, the technical team is considering

			potential changes due to climate change and updating models and associated predictions as applicable.
2.5.1.2.	The operating company shall: d. 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 e. Update the communications contacts of the emergency response plan at least annually.		In addition to the site-wide emergency drill plan, there are individual drills conducted in every work area at least quarterly. Responsible individuals complete a test of every emergency contact on a quarterly basis and complete updates as necessary. The emergency response team provides community services and makes many responses to local car crashes, fires, etc. There are annual meetings with all role players in major disaster response. While they have not included local fire departments, etc., in emergency drills in the last few years, they plan to reinstate that process. Note that the local emergency services often request mine emergency response team assistance. Therefore, this could be considered as substituting for local participation in some exercise scenarios (but not all.) In response to concerns raised during the Stage 2 IRMA site audit, the mine increased the number of drills. In 2024 they scheduled and conducted Internal drills of various hazard scenarios with key stakeholders including employees, including 15 drills with local communities. There were debriefs for each drill. The mine developed key performance indicators (KPIs) for engagement, execution of drills, completion of actions from lessons learned, etc. There were also numerous callouts in which various scenarios were encountered, ranging from house and grass fires to cows stuck in ditches, vehicle extrication, drowning, and rope rescues/recoveries. Drill scenarios have included cooperation with local emergency services, helicopter evacuation, and clinic capability. Not all significant scenarios have been drilled with all affected communities within the last 24 months. Drills for all significant emergency scenarios and all affected communities have reportedly been scheduled within the next two years.

			Communications contacts are updated quarterly. A responsible mine employee spends several days calling and checking WhatsApp groups and phone numbers.
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 mine states that the emergency preparedness and response plan for emergencies, which can affect communities, is prepared together with community representatives. Workshops are held with the representatives who facilitate awareness in the communities. The site emergency response plan (ERP) and business continuity management plan (BCMP) are drafted with the standards committee, which includes employee representatives. All site documents are shared with everyone via an email platform, and documents are readily available in SharePoint. In interviews with mine personnel, it was stated that community stakeholders and the tribal council were also involved (representing villages in area of influence), and that contract subject matter experts were brought on board to ensure adequate involvement of local bodies. For mine internal emergency response planning development, employee representatives are involved. Final documents are made accessible through a SharePoint portal where any employee can gain access. Evidence shows that an ERP is developed and communicated to potentially affected communities and workers. Related personnel are invited to participate in emergency response planning and provide feedback on various lessons learned and related concerns, which contribute to proposed updates. During community stakeholder interviews, at the Stage 2 audit, people stated that they were not consulted in the development of emergency plans but only told what had already been proposed or decided. This suggests that the initial stakeholders engaged through ccommunity early warning committees (CEWCs) may not be the same as those involved in the audit process.

In response to this and related concerns, the mine developed and implemented several actions to improve stakeholder consultation and participation. These included:

- Consultation with communities to identify the hazards of most significance to them. The top items identified were tailings failure, floods/heavy rains, lack of trained first aiders in the communities, and fire.

- Development of a multistakeholder community emergency preparedness drill evacuation plan.

- External endorsement and participation in drills from 15 traditional leaders of affected villages (most affected in potential inundation zone, - the communities/areas located in risk areas (such as downstream of tailings storage facilities (TSFs)) most likely to be inundated/flooded as a result of catastrophic failure of the retaining dam as per a technical risk assessment. Evacuation would be required for these communities/areas in case of a tailings failure.)

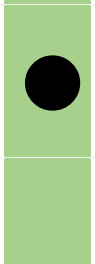
- Monthly engagements in affected communities through posters, pamphlets, community meetings, etc.

- The mine recruited 75 community emergency management personnel (EMPs) (mostly volunteer youths) and put them through external accredited disaster management training, including basic firefighting and first aid. A WhatsApp group and other forums were established for EMP's to collaborate.

- Tailings facility visits were conducted for community leaders and EMPs to enhance their understanding of TSF operation, risks and the controls in place.

- Involved community leaders, community EMP's and external support to develop evacuation routes, evacuation points, and other relevant parts of emergency response plans. They also involved schools, local police, taxi association, provincial and district disaster management departments.

			The above actions took place after the main site assessment and their effectiveness was not confirmed through community interviews and other follow-up.
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.		Did not make specific claims related to insurance in rationale, but provided documents to confirm that insurance is provided.
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 register of insurance confirms that insurance is provided to cover earthquakes, seepage / pollution / contamination resulting from physical damage, landslide into pit. There is a specific section detailing tailing storage facility coverage. Because so much product is moved from the site, note that all transporters are required to provide evidence of insurance, even though it is a contracted service. It is not clear if chemical spills/pollution would be covered if not due to physical damage (e.g., if due to a negligent or intentional discharge). Discussion with corporate personnel during the audit did not get the desired information to close this gap. It was generally believed that the company's liability insurance should cover all relevant risks, but the documentation was not available. Further follow-up is required.
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.		Accident insurance has been in place for more than 15 years. The mine has been owned and/or operated by Anglo American since around 1993. This requirement is therefore not relevant.

Chapter 2.6—Planning and Financing Reclamation and Closure			Basis for rating
2.6.1.1.	The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company.		According to the guarantees that were submitted to the Department of Mineral Affairs in 2023, the mine complies with the requirement to ensure that the cost for reclamation and exploration is adequately covered.
2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.		During interviews with Mogalakwena representatives, it was confirmed that no exploration is conducted outside of their boundaries according to their mining license.
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).		A procedure is in place for stakeholder grievances; however, no grievances have been recorded.
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.		As a closure plan was not a legal requirement at the time operations commenced, the auditor reviewed the closure plan dated November 2022, and found the plan to comply with the requirement.

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; 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: i. Stabilization and final topography of the reclaimed mine lands; ii. ii. Storm water runoff/run-on management;	Upon a detailed review of the closure plan dated November 2022, the auditor can confirm that the plan conforms to all the requirements.

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:
   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;
p. The role of the community in long-term monitoring and maintenance (if any); and
q. A schedule for all activities indicated in the plan.

2.6.2.3. 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:

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:
    i. Interim process water and site management; and
    ii. Short-term water treatment;
h. Post-closure costs for:
    i. Long-term water treatment; and
    ii. Long-term monitoring and maintenance;
i. Indirect Costs:
    i. Mobilization/demobilization;

Chapter 25 of the November 2022 closure report details the estimated reclamation, closure and post-closure costs.

These costs are reviewed and updated annually.

	ii. Engineering redesign, procurement and construction management; iii. Contractor overhead and profit; iv. Agency administration; v. Contingency; and j. Either: 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.	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.		Due to the rate expansion and changes that are happening at Mogalakwena Mine, the closure and rehabilitation plan is updated annually.
2.6.2.5.	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: a. If necessary, the operating company shall provide resources for capacity building and training to enable		To date this requirement has not been met; however, the mine acknowledges this and has included a public participation process in the scope of work for 2024.

	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.		
2.6.2.6.	**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.		The mine currently has no mechanism in place to make the reclamation and/or closure plan publicly available. The mine does however report that if a stakeholder should request a copy of both or one of the reports a mechanism is in place to make the requested report/s available.
2.6.3.1.	Open pits shall be partially or completely backfilled if: 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.		The current environmental program does not make provision for the backfilling of pits. However, the operation is looking into the possibility of backfilling the Sandsloot and Zwarfontein pits as part of the anthropogenic aquifer investigations. The specialist studies have just been received by the site and still must be studied. The current environmental management plan does not identify any pits for partially of complete backfilling. The reasons for this being that none of the parameters apply to any current pits.

2.6.3.2.	Underground mines shall be backfilled if: a. Subsidence is predicted on lands not owned by the mining company; and b. If the mining method allows.	—	Underground mining does not take place .
2.6.4.1.	**Critical** Financial surety instruments shall be in place for mine closure and post-closure.	●	The report (Platinum producers' environmental trust report: Proposed contributions for the year ending 31 December 2022) clearly shows the financial instruments in place from three different sources. The amounts apportioned to each of the three sources are clearly set out. The addition of the three amounts is equal to the total amount required.
2.6.4.2.	Financial surety instruments shall be: a. Independently guaranteed, reliable, and readily liquid; b. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan; c. In place before ground disturbance begins; and d. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed.	●	The submitted guarantees for 2023 were reviewed and found to be from three different independent companies. The mine submitted documents for the three financial instruments. Each of the guarantees is guaranteed individually by each institution. All three the companies are regarded as reliable, and able to make good on their individual commitments, in the South African context. It is pointed out, as in 2.6.2.1, that this requirement can only be measured against the current instruments in place. The amounts guaranteed by the individual instruments correlate with the calculations that determine the required amounts. These calculations are updated and adjusted annually.
2.6.4.3.	Self-bonding or corporate guarantees shall not be used.	●	All the guarantees are supported by banks or financial institutions. No self-bonding or corporate guarantees were observed as financial surety.

2.6.4.4.	The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request.	●	The operation would make available copies of requested financial reviews except for confidential business information, if requested by stakeholders. It is anticipated that a platform will be created where the data will be published.
2.6.4.5.	Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally: a. Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential reasons, the fact that the information has been withheld shall be disclosed along with the financial surety. b. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and c. Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested	⊗	The submitted guarantees for 2023 were reviewed and found to be from three different independent companies. The mine currently is not complying with any of the requirements set out.

	stakeholders with the opportunity to propose independent experts to review the financial surety.		
2.6.4.6.	The terms of the financial surety shall guarantee that the surety is not released until: 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.		All financial guarantees are provided to the Department of Mineral Resources and Energy (DMRE), and the onus rests on the operation to prove successful rehabilitation of the DMRE before any guarantees are returned. The mine has no mechanism in place that allows for public comment before a partial or final surety release.
2.6.5.1.	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: 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.		According to the gap analysis contained in the Mine Closure Plan for Mogalakwena Complex, (Aligned with the requirements of the Anglo American Mine Closure Toolbox Version 3) compiled by WSP Golder in November 2022 a number of gaps were identified, including the requirements as stated. The report calls for an MAP (Master Action Plan) to be drawn up. The MAP will address the gaps with the aim of closing out the gaps.

2.6.5.2.	Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance.		The gap analysis, as set out in the Mine Closure Plan for Mogalakwena Complex, (Aligned with the requirements of the Anglo American Mine Closure Toolbox Version 3) compiled by WSP Golder in November 2022, makes no reference to the determination of locations and the number of locations required to ensure off-site contamination is detected.
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.		Although the closure plan addresses the 25-year requirement, it currently is not aligned with the IRMA water quality criteria.
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.		The environmental management plan states that the rehabilitation monitoring and care and maintenance will take place during the 10-year post-closure period. Biological processes can be demonstrated to be occurring, leading to vegetation covers being stable and sustainable, within this timeframe. Biomonitoring will continue for at least 10 years post-closure.
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.		The companies Neyleti Consulting (Pty) Ltd and Itasca Denver, Inc concluded specialist pit water studies, including a water balance and a rationale around post-closure use. The scope of work covers both a sudden mine closure and a life of mine closure. At the time of the audit, the report was still being studied by the mine to understand the suggested strategies around pit water post-closure.

2.6.6.1.	Long-term water treatment shall not take place unless: 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: 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 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.	—	The mine reports that currently no long-term water treatment program is planned for post-closure.

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.		Mogalakwena operation is investing in groundwater studies to understand the viability and use of pit lake water post-closure, as this could be a critical resource in a water scarce environment. The studies have been completed; however, the mine is still studying the outcome of the studies.
2.6.7.1.	The operating company shall provide sufficient financial surety for all long-term activities, including: mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company's finances at the time of mine closure or bankruptcy.		The updated 2023 calculations and closure report guarantees cover the amount as set out in the IRMA requirement.
2.6.7.2.	If long-term water treatment is required post-closure: a. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and b. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure		Mogalakwena operation has costed for long term ground and surface water monitoring and has also provisioned for studies relating to pit lakes, tailing storage facility's pollution plume and waste rock dump seepage. Studies to determine whether long term water treatment will be required are still in progress.

	monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded.		
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.		A third-party specialist, WSP Golder, is appointed to recalculate the closure and post closure costs annually.
2.6.7.4.	Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including: 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 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).		Mogalakwena operation does not use net present value. Real monetary terms are used to calculate financial guarantees. The closure cost is to be expended in a future time horizon, making the net present value of this cost negligible, and hence not a significant factor in decisions.

Principle 3: Social Responsibility

RATING LEGEND
Description of performance

●	Fully meets
◕	Substantially meets
◑	Partially meets
⊗	Does not meet
—	Not relevant

Chapter 3.1—Fair Labor and Terms of Work			Basis for rating
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.	●	Anglo American has developed a Group Human Rights Policy (2021). The organization has also developed a Group Inclusion and Diversity Policy (2021). Both policies have been adopted and implemented at the site level and are set for review over a 3-year cycle. Employee awareness of the policies is facilitated through monthly theme-based meetings (e.g., disability month, diversity month, etc.). The policies are shared internally through the Living with Dignity Hub and company newspapers that employees can take home. On-site interviews with employees and contracted workers confirm awareness of indicated policies through induction training. Interviews, including union representatives and on-site observation of Living with Dignity posters and gender-based violence training confirm adherence to host company law and expectations.
3.1.2.1.	**Critical** The operating company shall respect the rights of workers to	◕	The Group Human Rights Policy includes a commitment to the International Labor Organization's fundamental labor rights, respect

freedom of association and collective bargaining.

for the right to freedom of association and collective bargaining, and the right to equal remuneration for equal work. Implementation of the site recognition agreement (collective agreement) with the National Union of Mineworkers confirms respect for workers' rights directly employed by the operating company.

On-site interviews with Anglo American employees and managers confirm awareness of unions and the right to join or not join a union. Union representation is available to members during grievance processes. Unions and management hold regular meetings to discuss relevant issues at national, regional and site levels. Interviews with union representatives confirm adherence to the recognition agreement terms, conditions, and intent.

Interviews with contracted workers indicate there is virtually no union membership in the business partner workforce. Interviews with workers suggest business partners and suppliers may not favor unionization of their workforce. Some contracted workers also indicated the perception that expressing an interest in joining a union could result in their termination from contracted employment. While there is strong evidence that the operating company respects the right of workers to associate and collectively bargain, it is uncertain whether the rights of contracted workers, who make up approximately 80% of the site's workforce, are fully respected by business partners. It could not be verified if the South African Constitution's protection of the right to freedom of association or the Group Responsible Sourcing Standard for Suppliers (Section 3.5) was being implemented.

Since the Stage 2 assessment and based on the findings above from on-site confidential interviews regarding the general absence of unionization of contracted workers in the Mine’s overall workforce, the Site implemented a third-party analysis of contracted companies that found approximately 80% compliance with freedom to associate requirements of the Group Responsible Sourcing Standard. Mogalakwena has requested South Africa Department of Labour audits on a quarterly basis to verify

			compliance with national law and constitutional requirements. The employee and contracted worker induction presentation has been updated to emphasize the rights of workers to freely associate. Refresher sessions will be held with workers every 18 months. Awareness sessions have been and will be held with business partners and managers. Mogalakwena reports receiving an inquiry from a business partner on the process for establishing an agreement with a union. Shop Steward onboarding has been updated. A Visible Felt Leadership campaign has been implemented to highlight, among other topics, the rights of workers to freely associate. Procurement Department managers will also receive training with respect to contract requirements and freedom of association. Mogalakwena reported that an internal analysis of contractor companies also concluded that some smaller local suppliers did not have adequate or fully qualified human resource management personnel. Over the long term, the Site intends to make improvements to its Contractor Social Management process.
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.	—	The South African Constitution Section 18 confirms the right to freely associate. This criterion is therefore Not Relevant.
3.1.2.3.	The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for	●	On-site interviews with union representatives confirm that the recognition agreement (collective agreement) in place is currently under review by the union and management. Unions and management hold regular meetings to discuss relevant issues at national, regional and site levels. Example minutes and attendance

	meaningful negotiation in a timely manner.		records for the management/union future forum meetings were provided. A wage negotiations update was also provided. On-site interviews with employees and union representatives confirm information is shared in a timely manner.
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.		On-site interviews with union representatives confirm that elected shop stewards and health and safety union representatives are provided with office space, telecommunications and other support materials and services to conduct their work on behalf of union members.
3.1.2.5.	The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike.		Both employees and managers are represented by one of two branches of the National Union of Mineworkers recognized and operating at the mine. On-site interviews with union representatives did not indicate that the operating company has interfered in the unionization process or the work of the union. Contracted workers are typically not unionized. Interviews with contracted workers (that make up approximately 80% of the site's workforce) do not provide evidence that the operating company has actively interfered in the unionization process. However, on-site interviews with union representatives indicate recognition agreements would need to be negotiated with individual business partners to facilitate the unionization process.
3.1.2.6.	Upon employment, the operating company shall: a. Inform workers of their rights under national labor and employment law;		The union verification procedure is intended to provide a monthly verification of union membership by human resources staff as a means of protecting the freedom to associate. Induction includes review of human rights, including the nationally recognized

	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.		freedom to associate. Full-time elected shop stewards provide information to Anglo American employees based on the recognition agreement in place. Copies of the recognition agreement are available from union representatives. On-site interviews with employees, contracted workers and union representatives confirm that the workforce is aware of their right to freely associate and bargain collectively, but in the absence of recognition agreements with business partners the union does not typically facilitate discussion of contracted workers' right to freely associate or collectively bargain.
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.		The evidence provided (induction presentation; management - union forum minutes; attendance records) and on-site interviews with managers, employees and contracted workers do not indicate that workers have been discriminated against in their participation in union business or action. However, contracted workers employed by business partners are typically not represented by worker organizations.
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.		The evidence provided (recognition agreement, management/union forum minutes, attendance records) and on-site interviews with managers, unionized employees and union representatives indicates the terms of the recognition agreement (collective agreement) and wage negotiations have been and are being respected. The recognition agreement is currently under review by management and union representatives within established forums.

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.		Evidence provided (fixed term memo, central bargaining forum minutes, recognition agreement) and on-site interviews with managers and union representatives indicates the site does use fixed term contracts in some instances for specific critical role projects and purposes. Union representatives are made aware of these short-term contracts. There was no evidence that the operating company is actively undermining or not implementing the terms of collective agreements through the regular use of fixed term contracts. However, there is ample evidence the operating company through an act of omission is not adequately implementing the Group Responsible Sourcing Standard for Suppliers, which serves to undermine the right of contracted workers to freely associate and any efforts by workers to organize.
3.1.2.10.	The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike.		Evidence provided (employee relations steering committee minutes, central bargaining forum minutes, recognition agreement) and on-site interviews with managers and union representatives indicate the site does employ replacement workers, but not in the context of efforts to interfere with legal actions by unions.
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 (Recruitment and Selection Standard, Employment Equity Annual Report) demonstrates the site's focus on non-discriminatory recruitment of full-time workers directly employed by the operating company. On-site interviews with managers, employees, contracted workers, and union representatives support this finding. However, with respect to contracted workers employed by suppliers (representing approximately 80% of the site's workforce) evidence was not

			provided or available to confirm that contracted workers are employed on a similar non-discriminatory basis.
3.1.3.2	Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of: a. Targets or quotas mandated by law; b. Targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; or 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.		Evidence provided (social and labor plan) and on-site interviews with managers, employees, contracted workers, and union representatives, indicates that the site does make exceptions to its hiring practices to promote the hiring of local residents and women. The social and labor plan is a mandated government requirement to enhance local employment. The site's participation in a national Women in Mining program also is aimed at promoting increased female participation in the workforce at all levels.
3.1.3.3.	**Critical** The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.		Evidence provided (implementation of the Living with Dignity Hub, induction materials; general manager message regarding gender-based violence, YourVoice anonymous grievance mechanism, Women in Mining initiative, induction training, implementation of panic button system on site vehicles) demonstrates actions to prevent harassment and intimidation, especially of female workers. However, on-site interviews with employees and contracted workers indicate both specific instances and the potential for harassment of women, especially contracted female workers whose lack of job security may reduce the likelihood of their use of available grievance mechanisms.

3.1.4.1.	Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination, and be implemented to reduce the adverse impacts of retrenchment on workers.	◐	During previous retrenchments, on-site interviews with managers indicate that, efforts were made to accommodate vulnerable employee groups, including local residents and women. Mutual separation packages were provided to retrenched employees. Although management/union forums exist in relation to the employee relations recognition agreement, no evidence was provided that the site undertakes an analysis of alternatives to retrenchment in consultation with workers or their organizations. No evidence was provided with respect to retrenchment planning as it relates to workers employed by business partners.
3.1.4.2.	The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments.	◐	Evidence provided (conditions of employment and benefits manual; mutual separation package term and sample agreement; vulnerable employees presentation) indicates that in previous retrenchment exercises, permanent full-time employees of the operating company have been provided notice of dismissal and offered mutual separation packages. On-site interviews with managers and union representatives indicate retrenchment was undertaken consistent with the terms of employment and the recognition agreement. However, no evidence was provided that indicates how contracted workers (who make up approximately 80% of the site's workforce) employed by business partners are treated during a period of retrenchment.

3.1.5.1. **Critical** The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:

a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;
b. Shall allow for anonymous complaints to be raised and addressed;
c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and
d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The site has several internal grievance mechanisms accessible on multiple platforms to permanent Anglo American employees and contracted business partner workers, including the Living With Dignity Hub and the anonymous YourVoice process. However, review of the grievance register for Anglo American employees documents an extremely small number of grievances to date in 2023. Management interviews indicate an informal process is used to resolve grievances, sometimes with union participation, but that this process is not documented.

Approximately 80% of the mine's workforce are contracted through the operating company's business partners. Multiple worker interviews highlight business partners may or may not provide their workers with signed contracts (a requirement under South Africa's Basic Conditions of Employment Act and the operating company's Responsible Sourcing Standard for Suppliers). As a result, grievances may not be lodged (especially in cited instances where there is a perceived power imbalance between a contracted worker and a permanent employee). Business partner grievance processes, if they exist, were not provided as evidence. Grievances which may be lodged with business partner employers are not managed / facilitated through the operating company's contractor management or employee relations departments. Management interviews indicated that a Department of Labor audit of business partners was undertaken in 2022, but the findings from this audit were not available for review at the time of undertaking this assessment.

Since the Stage 2 assessment, Mogalakwena has undertaken an internal analysis of the grievance procedure process that concluded employees and contracted workers were not sufficiently aware of the grievance procedure or uncertain how to lodge a grievance. An analysis also concluded that some smaller local suppliers did not have adequate or fully qualified human resource management personnel. Over the long term, the site intends to make improvements to its Contractor Social Management process.

			The Grievance Procedure has been reviewed and updated. A brochure explaining grievance procedures has been developed and posted in various locations on-site. Versions in languages spoken locally are in development. While numbers remain low in relative terms, the site notes several instances where contracted workers have approached the Mine to resolve grievances in relation to required Unemployment Insurance Fund (UIF) deductions or wages. The site noted sixteen (16) cases reported to the Living With Dignity hub, of which 70% were lodged by contracted workers. While these cases were predominantly not related to employment or workplace conditions, the site indicates full or partial resolution in all instances. Mogalakwena acknowledges the current informal and undocumented process for resolving grievances (with or without union participation or representation in the resolution process). A Visible Felt Leadership campaign, updates to grievance procedures and awareness information are intended to assist in improving the effectiveness of implemented grievance mechanisms.
3.1.5.2.	The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.		The site has several internal grievance mechanisms accessible on multiple platforms to permanent Anglo American employees and contracted business partner workers, including the Living With Dignity Hub and the anonymous YourVoice process. The grievance procedure is part of the induction presentation required for all workers to gain access to the site. Living With Dignity posters also include contact information. Full-time elected shop stewards are also available on-site to provide information to unionized employees and other workers on request. However, worker interviews indicate that not all employees and contracted workers are fully aware of grievance mechanisms or would be comfortable using them. Contracted workers in particular indicated that grievances would typically not be lodged due to anticipated inaction.

3.1.5.3.	The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues.		The site's grievance register, which documents grievances lodged actions taken in resolution by permanent full-time employees, was reviewed. A separate register that documents harassment and sexual harassment cases that are referred to the Group Living with Dignity Hub for action was also reviewed online. However, the number of documented grievances in 2023 for employees was small (4). The explanation provided during management interviews was the site typically utilizes an informal undocumented process to resolve grievances. A register that documents grievances by workers employed by business partners was not provided. An instance was cited during management interviews involving a contracted worker and an Anglo American manager, but no further evidence of a documented grievance process for contracted workers was made available.
3.1.6.1.	The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers.		The evidence provided (code of conduct; behavioral procedure; disciplinary checklist) indicates there is a documented disciplinary process in place for permanent full-time employees. On-site management, employee and contracted worker interviews indicate that other disciplinary procedures may be utilized by business partners whereby the operating company would not take direct disciplinary action against a contracted worker but may influence the outcome of disciplinary proceedings by removing access to the site. No evidence of business partner disciplinary procedures was provided or available.
3.1.6.2.	The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation of workers during disciplinary actions.		Anglo American's code of conduct commits the operating company and its suppliers to adhere with national human rights and labor laws and international commitments with respect to the prohibition of corporal punishment and other degrading forms of discipline. The behavioral procedure applies to permanent full-time employees. On-site interviews with employees and contracted workers did not find evidence of corporal punishment being used during disciplinary action. Interviews with business partners or

			documentation regarding disciplinary procedures were not reviewed.
3.1.6.3.	The operating company shall keep records of all disciplinary actions taken.		Evidence of the disciplinary actions was not provided prior to the on-site audit due to the South African Protection of Personal Information Act requirements. Disciplinary actions are recorded in an employee relations navigator system for permanent full-time employees. Evidence of similar systems kept by business partners for contracted workers was not reviewed.
3.1.7.1.	The operating company shall document the ages of all workers.		Evidence provided (worker list) indicates that the site documents all employees' and contracted workers' ages after application of a worker credential verification process undertaken by an independent business partner.
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).		Evidence provided, including South Africa legislation, supported by management, employee and contracted worker interviews, indicates that the operating company does not employ workers under the age of 18.
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.		From the evidence provided, supported by on-site interviews with managers, employees, and contracted workers, there is no indication that the operating company or business partners are employing workers under the age of 18.
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		This section is Not Relevant. From the evidence provided, supported by on-site interviews with managers, employees, and contracted workers, there is no indication that the operating company or business partners are employing workers under the age of 18.

	labor authority, or if that is not possible, by the company itself.		
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: a. The child shall be removed immediately from his or her job; and 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.	—	This section is Not Relevant. From the evidence provided, supported by on-site interviews with managers, employees, and contracted workers, there is no indication that the operating company or business partners are employing workers under the age of 18.
3.1.7.6.	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	●	From the evidence provided, supported by on-site interviews with managers, employees, and contracted workers, there is not a high risk of child labor in the mine's supply chain. South Africa law and the Group Responsible Sourcing Standard prohibit the use of child labor. Age verification is part of the third-party identification verification process.

	demonstrate that they are complying with this chapter.		
3.1.8.1.	**Critical** The operating company shall not employ forced labor or participate in the trafficking of persons.		From the evidence provided (code of conduct, responsible sourcing standard for suppliers, human rights policy, and the modern slavery report), supported by on-site interviews with managers, employees, and contracted workers, there is no indication that the operating company employs forced labor or participates in human trafficking. However, evidence demonstrating effective due diligence on the site's supply chain was not provided for review.
3.1.8.2.	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 it 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 that can demonstrate that they are complying with this chapter.		From the evidence provided (code of conduct, responsible sourcing standard for suppliers, human rights policy, and the modern slavery report), supported by on-site interviews with managers, employees, and contracted workers, there is no indication that there is a high risk of forced labor in the operating company's supply chain. However, evidence demonstrating effective due diligence was not provided for review.
3.1.9.1.	The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage.		Evidence provided (recognition agreement, and the wage negotiations update), supported by on-site management and employee interviews, indicates that permanent full-time employees are paid more than what would be considered a "living wage." However, no evidence was provided that would verify that all workers employed by business partners (approximately 80% of the workforce) are paid a living wage or that the operating company

			undertakes an analysis or calculation of what constitutes a living wage.
3.1.9.2.	Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage.	●	The evidence provided (conditions of employment manual, recognition agreement, and the Basic Conditions of Employment Act), supported by on-site interviews with management, employees, contract workers and union representatives, confirms that overtime is paid at a rate above the regular hourly wage.
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.	◐	Consistent with national legislation, permanent full-time employees are provided with a written employment contract that explains wages and benefits. This information is supplemented by the conditions of employment manual and the recognition agreement. However, on-site interviews with workers employed by business partners indicate that many are working without a written and signed contract and without deductions being made. Contracted workers also cited instances where they were not paid by their business partner employer on a regular or consistent basis.
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).	●	For full-time permanent employees, whether a member of the union or not, the operating company makes payments and deductions through electronic bank transfer, in adherence to national legislation, the employment contract and recognition agreement.
3.1.9.5.	The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist: a. Deductions from wages for disciplinary purposes are permitted by national law, and the law	●	Evidence provided (conditions of employment manual; employee relations recognition agreement), supplemented by on-site management and employee interviews, indicates deductions are not made for disciplinary purposes. However, disciplinary action may include an unpaid suspension.

	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.		
3.1.10.1.	The operating company shall ensure that: 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: 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	●	The site moved to 12-hour shifts in 2023. The recognition agreement and conditions of employment manual describe regular working hours. National legislation limits the number of hours worked in a week to less than 48 hours, with at least 24 hours of consecutive hours of rest. On-site interviews with management, employees and contracted workers indicate adherence to national standards, that overtime is typically consensual unless emergency conditions exist, and that a rest period of at least 24 hours is available between shifts.

	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.		
3.1.10.2.	Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide: 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.		For full-time permanent employees, whether a member of the union or not, the employee relations recognition agreement or conditions of employment manual describe paid leave and maternity leave that exceeds national standards. However, on-site interviews indicate that many workers employed by business partners do not receive paid leave or benefit, with some workers employed without written and signed contract terms being in place.

Chapter 3.2—Occupational Health and Safety		Basis for rating
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 has a safety, health, and environment management system in place that includes various documents and processes: - Training, induction and awareness of all employees including visitors - Medical surveillance - Safety, health, and environmental documentation, inspections and audits - Risk assessment processes - Change management and communication, etc. The safety, health, and environment (SHE) management system covers the foundation of the system, the policy, persons responsible, consultation of workers, planning, support processes, operation, performance evaluations, and improvement. It includes elements of contractor management, and emergency preparedness, and appears to closely follow ISO 14001/45001 elements. Site observations at Stage 2 included visits to and some related worker and supervisor discussion at: south concentrator, heavy equipment shops, drilling and blasting operations, pit operations overview, fueling locations, tailings storage facilities (TSF), return water dams, waste salvage yard, general waste landfill, and discussion/remote observation of activities at crushers, ore stockpiles and waste rock dumps. The behaviors, conditions, and processes noted during the visit can generally be characterized as satisfactory from a health and safety standpoint, with a few exceptions recorded elsewhere, where relevant to individual IRMA requirements. Overall, the presence and implementation of a safety, health and environment (SHE)

			management system can be considered to substantially meet IRMA requirements.
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 operator states there are various risk assessment processes from the strategic point to the point of work. Every task on-site requires a risk assessment. The baseline risk assessment is constantly under review. The documents provided demonstrate a combination of approaches, including social and human rights impact and risk analysis (SHIRA) an issue-based risk assessment. Also, there is some internal monitoring for reviews and effectiveness. Processes require prioritization of risks and opportunities, development of associated objectives and actions, integration into normal business processes, and monitoring. During site visits, observed control of work processes included multiple levels of task-based risk assessment and review. (e.g., the opinion replacement/alignment job at the south concentrator generally seemed to be well-executed and no unidentified or uncontrolled risks were observed.) At the NitroPlus temporary fueling location, the risk of employees getting fuel or dust in their eyes or on their clothing did not seem to have been identified or properly controlled. There was no provision for first-aid eyewash, and employees were fueling haul trucks wearing normal safety glasses. Splash-resistant goggles or face shields were not provided. Business partner workers reported not having spare personal protective equipment (PPE). In the event they got splashed with fuel, they could not wash off or change clothing until after their shift.
3.2.2.2.	The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated		Processes appear to cover all IRMA requirements related to: a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working

with the mining project, including those related to: 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.	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. e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems, and services. When contractors are onboarding, they are required to submit risk assessments for the task that they will be performing, be it routine or non-routine. Passport 360 is used for contractor management. Visitors are not allowed to perform work on-site. Priority unwanted events are identified in baseline workplace risk assessment and control (WRAC). There are references for emergency preparedness for further risk assessments related to unwanted/unplanned events. Management of change (MoC): The change initiator and sponsor will kick off the change management process and ensure the process is followed. The process is split into short- and long-term change, emergency change and temporary change. The MoC process is newly moved to and incorporated into Isometrix. Only trained people can access it. There is an opportunity for people to use a paper-based program until they have received training. Actions arising from reviews are managed in Isometrix, which can highlight overdue actions, etc. Contractors may not always be identifying and assessing the consequence of hazards. At the temporary fueling location, business partner (contractor) employees reported not having spare personal protective clothing. In the event they got splashed with fuel, they could not wash off or change clothing until after their shift. Many

			other business partner workers also reported only receiving one or two work uniforms per year.
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 operator states that risk assessments are performed for hazards that are identified, where specific risks pose more danger to vulnerable employees. Further assessments and accommodation are made to ensure continued health and safety. The evidence provided covers pregnant employees and there is a procedure specific to HIV that addresses any unique considerations. Older or younger employees may have work restrictions based on medical surveillance and subsequent recommendations from occupational therapy. There is a process for considering disabilities with ongoing strategy development. Job risk analyses address remote work and any unique vulnerabilities. The fitness to work procedure covers many of the required elements.
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.		Operator's risk management processes require prioritization of risks/opportunities, development of associated objectives and actions, integration into normal business processes, and monitoring. The process considers hierarchy of control when developing actions to address risks. The operator's response focuses mainly on constant updates of the risk management baseline and does not address processes for developing risk mitigation strategies, although that is discussed in other supplied documents. The Mogalakwena baseline under review in the 2022 hazard inventory includes magnitude of hazard data that is in different form for each hazard. This suggests that the use of the inventory document was not fully understood by those completing it, creating a gap in understanding how to measure risk. Nevertheless, this prevents effectively ranking the identified risks.

			Additionally, the Baseline Workplace Risk Assessment and Control and other available documents do not show that risk assessment led to measures to detect early development of potentially hazardous events. Elsewhere, the operator states that systems are in place to detect developing conditions, such as fatigue detection devices on heavy mining equipment (HME), pedestrian / trackless mobile machinery (TMM) collision avoidance systems, inclement weather warning devices and procedures.
3.2.2.5.	In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to: 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		Evidence supports that procedural controls are developed for a wide range of hazardous activities and conditions. Underground operations were under development, and after discussion, they were confirmed to be managed as a separate project, by a separate management team, and therefore out of scope, which would make requirements d. and e. related to exits and ventilation of underground workings not relevant. a. Equipment, communications systems, and associated conditions noted during the assessment, generally appeared to be suitable for safe and healthy working. b. Interviews with workers confirmed that hazards were generally known, and risks understood. Some welding carts had been modified to improve ergonomics, which led to acetylene cylinders being transported in a horizontal position. The risk had not been recognized or properly managed (modifications were initiated, during the assessment, to address this concern.) c. Discussions and observations confirmed the mine had qualified personnel, engineering designs, operating practices, and monitoring to maintain ground stability. d., e. The auditors verified that underground development operation was sufficiently separate from main mine operations to be considered out of scope. Nevertheless, it was noted that there were

	connected to separate means of egress to the surface; e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted; f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards; g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location.		two inter-connected declines, with evidence of substantial forced ventilation in place. f. At the heavy equipment shop, eyewash and safety showers were disconnected. Facility personnel shared a belief that these were not strictly required due to limited activities with hazardous chemicals and the presence of eyewash facilities in adjacent areas. However, workers could clearly be exposed to dust/mud, fuel, oils, coolant, or other materials that could get in their eyes or on their skin. At the temporary fueling location, there was no provision for first-aid eyewash, and employees were fueling haul trucks wearing normal safety glasses. Splash-resistant goggles or face shields were not provided. g. Dust or hazardous gas accumulation was not noted to be an issue from a fire/explosion standpoint. h. There were ample communications regarding the right and responsibility to stop work or for workers to remove themselves from high-risk situations. These were well understood by all the workers interviewed. However, during worker interviews, multiple people commented that they are sometimes required to work in risky circumstances such as excessive dust or when fatigued.
3.2.3.1.	Workers shall be informed of their rights to: a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority; 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;		The operator stated that workers are adequately informed of their rights to health and safety as per the standard requirement 3.2.3.1 a-f as they are taken through on-site induction and training related to environmental, health and safety policies and procedures. Workers have the right to elect health and safety representatives by law and there is a Mandatory Code of Practice (MCOP) to that effect. Provided documents cover the right/obligation to report incidents and the right to withdraw from hazardous situations, but do not appear to address other requirements, including the right to: b. Request and obtain inspections and investigations to be conducted by the employer and the competent authority.

	c. Know and be informed of workplace hazards that may affect their safety or health; d. Obtain information relevant to their safety or health, held by the employer or the competent authority; 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 f. Collectively select safety and health representatives.		d. Obtain information relevant to their safety or health, held by the employer or the competent authority. However, mine personnel reported that regulations include all related rights, such as the right to request a regulatory inspection. Employees participate in such inspections. Union reps should receive training on this topic, but it is not clear if they do. e. Right to withdraw is codified in regulations. f. Election of worker representatives is codified in regulations and union agreements. Based on interviews with personnel, all employees in the main mining operation, including contractors, were aware of these rights. Workers in lower-paid supporting roles, such as cleaners, were not always clear on these rights, most notably the right to stop work and/or remove themselves from dangerous situations.
3.2.3.2.	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.		As required by law, the mine developed a Mandatory Code of Practice (MCOP) on the right to refuse dangerous work. This document stipulates that employees shall not be disciplined for exercising their right to refuse dangerous work and / or leaving a dangerous working place. This only addresses the lack of reprisals for this particular right of reporting or withdrawal. Anglo American employees interviewed stated that they felt there were systems in place to prevent reprisals, and managers believed this to be the same for contractors. Interviews with workers did not align with this belief; however, interviews with contract (business partner) workers indicated a range of confidence. Some contractor employees stated that they could be terminated for complaining about work conditions, including safety concerns. There were also some workers who stated they had no employment contract, effectively giving them no protection at all. During interviews, one contract worker shared an example where their colleague had been discouraged from seeking maternity leave and that related requests

			were immediately shared with supervisors who reprimanded them for asking. As noted in 3.1.2.1, since the Stage 2 assessment, the Site implemented a third-party analysis of contracted companies that found approximately 80% compliance with freedom to associate requirements of the Group Responsible Sourcing Standard. Mogalakwena has requested South Africa Department of Labour audits on a quarterly basis to verify compliance with national law and constitutional requirements. The employee and contracted worker induction presentation has been updated to emphasize the rights of workers to freely associate. Refresher sessions will be held with workers every 18 months. Awareness sessions have been and will be held with business partners and managers. A Visible Felt Leadership campaign has been implemented to highlight, among other topics, the rights of workers to freely associate. Procurement Department managers will also receive training with respect to contract requirements and freedom of association. Over the long term, the Site intends to make improvements to its Contractor Social Management process.
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 site has a dedicated communications department and shares health and safety issues via several forums. Supplied evidence confirms that employees attend weekly communications meetings, and that information is made available in various ways. Site inspection and interviews confirmed that there are systems in place to communicate health and safety matters to workers and to solicit input from workers. These processes were not always fully effective, however. Interviews with business partner employees indicated that they had some health and safety concerns that were not effectively communicated, such as lack of water and toilet/washing facilities at the waste salvage yard or lack of spare personal protective equipment (PPE) for fuel-handling workers.

3.2.3.4.	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: 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 operator states that Mogalakwena complex has developed and implemented a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety. There's also an employee assistance program (EAP) run at the clinic for improved wellness in the workplace. Participation of employee representation in all hazard identification risk assessment-related exercises on-site is mandatory - quorum. Employee representatives, management and safety, health and environment representatives form part of the drafting committee for the Mandatory Codes of Practice (MCOPs), which are the framework of the workplace health programs. These workplace health programs include and address mental health. The evidence provided shows that operational managers and members of the safety, health and environment committee participated in the drafting of MCOPs. Also, there is a process to elect, per workplace and per shift, health and safety representatives, full-time health and safety stewards, and full-time health and safety representatives as part of the union agreement. Responsible managers stated that there are around 100 health and safety representatives across the complex and that union representatives and employees must participate in regulatory inspections. Site visit observations and interviews verified that there are processes in place for worker consultation and participation in matters relating to occupational health and safety. Some business partner workers, however, especially those working for smaller companies, did not have adequate representation or opportunities to participate.
3.2.3.5.	The operating company shall provide workers' health and safety representatives with the opportunity to:		The operator states that the health and safety representatives form part of the team in all investigations, and when the regulators visit the site for inspections or investigations the health and safety representatives form part of the team. They carry out workplace

	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.		inspections and have access to the regulators and advisers. When accidents occur, they are immediately notified. The evidence provided shows that employees (health and safety representatives) participate in inspections by regulators. During Stage 2: documents relating to the appointment of safety, health, and environment committee members confirmed that they have recourse to independent experts. Some business partner workers, especially those working for smaller companies, did not have adequate representation or opportunities to participate.
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 accessing the mine premises receive training and personal protective equipment (PPE) adequate for the areas they may enter or tasks they may carry out. Supporting documentation confirms that a site induction exists and that some personnel are provided with PPE upon request. Observations and discussion during the Stage 2 site visit confirmed that visitors and other third parties accessing the mine receive an occupational health and safety briefing and are provided with relevant PPE.
3.2.4.1.	**Critical** (a and b) The operating company shall implement measures to protect the safety and health of workers including: a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;		Measures are in place to protect the health and safety of employees in line with statutory requirements in the Mine Health and Safety Act and related regulations and other relevant legislation. These are also tested on a regular basis by audits and inspections by relevant authorities. a. Various means of communication are in place to ensure employees are aware of risks at work including - email communication, noticeboards, training sessions, etc. At the beginning of every shift a line-up meeting is held to discuss daily work plans, and health and safety. Programs are in place for the awareness of noise and provision of protection against identified

b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.	hazards. There is communication to employees of their right to complain. b. The company provides personal protective equipment (PPE) at no cost to employees. Interviews at Stage 2 indicated this was also the case for contractors. Mine has a program for equipment inspections. c. Mine has programs for first-aid availability and procedures exist to manage first aid or more serious incidents. First aid equipment is inspected monthly. Where deficiencies are found they are immediately corrected by replacing the deficient item / bag. The mine has contracted emergency medical services (EMS) to respond to all incidents, including injuries and illnesses, at no cost. The service is also extended to neighboring communities at no cost. d. Training is given to employees to protect health and safety, including safety inductions and other safety-related training. e. There are supervisors on every shift. Procedures are in place to ensure that employees are not exposed to hazards while performing work at the mine. Various other procedures exist for the healthy and safe execution of work. f. Provision of underground location tracking was not addressed at the time of the audit, as the underground operations were considered out of scope. Site observations at Stage 2 included visits to and some related worker and supervisor discussion at: south concentrator, heavy equipment shops, drilling and blasting operations, pit operations overview, fueling locations, tailings storage facilities, return water dams, waste salvage yard, and general waste landfill, and discussion or remote observation of activities at crushers, ore stockpiles and waste rock dumps. The behaviors, conditions, and processes noted during the visit can generally be characterized as satisfactory from a health and safety standpoint, with a few exceptions recorded elsewhere, where

			relevant to individual IRMA requirements. Gaps that were noted in some locations, but not across all locations visited, included: - Some business partner (contractor) employees reported receiving only one or two personal protective equipment (PPE) work uniforms per year. In the case of workers fueling haul trucks, they indicated that they sometimes had to wear soiled/fuel-stained clothing to complete a shift as they did not have spare PPE to change into. For fuel-soaked clothing, this represents a risk of contact dermatitis and diminishing/negating fire-protection. - Some locations did not have adequate provision for eyewash/safety showers - most notably at the heavy equipment shop, where existing installations were disconnected, and at the temporary fueling site, where there were no such facilities at all.
3.2.4.2.	If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers.		There are processes in place to address risks to employees who are vulnerable, (e.g., pregnant women are immediately moved from risk areas as soon as pregnancy is declared). Employees with medical conditions that have an impact on their work undergo shorter medical surveillance at the discretion of the occupational medicine physician (OMP). During the COVID-19 outbreak, vulnerable employees were accommodated to ensure that they were protected. The company adopts the group procedure, which outlines different requirements for employees, (e.g., pregnant employees are moved from high-risk areas as soon as they report). Specific work was undertaken to identify and adequately protect vulnerable workers in relation to the COVID-19 pandemic.
3.2.4.3.	The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water,		The mine states that improvement opportunities are mainly due to the increasing number of employees as the mine expands, which sometimes may put pressure on facilities with the growing number and gender of staff employed.

	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.	■	Monthly water quality monitoring is conducted to ensure water supplied is fit for consumption. Audits by the Public Health Department indicate some concerns in a small number of aspects in locker rooms. Several issues, such as water not available for hand washing, were noted at all mobile toilets. Water monitoring data supplied for May 2023 showed one sample of 15 to have a total heterotrophic count above the recommended limit of 500 cfu /ml. Observations indicated that suitable water, ablution, and hygiene facilities were available in most areas where they were required. However, workers at the waste yard, sorting and separating waste materials, were not provided with a water supply, bathrooms, or washing and/or shower facilities to ensure they are able to eat in hygienic conditions and wash up before going home. During a follow-up, the mine had made significant improvements to the area, including the creation of a “green area” (rest area for employees) with a kitchen and bathroom on location.
3.2.4.4.	The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows: a. In countries where workers’ compensation is not provided through government schemes or a collective bargaining agreement: i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period; ii. If a worker is not able to return to work due to the severity of the	◔	The operator states that compensation is done by RMA, the company’s insurance provider. The occupational medicine physician (OMP) will refer employees and processes to follow for the compensation of affected employees. The employee handbook notes that death and disability insurance is provided. Upon identifying work-related hearing loss, the mine employs a recognized compensation scheme. The information provided does not confirm whether coverage addresses all requirements or if it includes issues arising from work-related diseases that manifest after a worker has retired. Discussion during Stage 2 did not confirm whether programs related to occupational diseases such as silicosis or other industrial diseases exist.

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.		
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.		Mogalakwena mine management and workers' representatives have signed a health and safety agreement and are on a joint health and safety committee. Management and employee representatives perform regular inspections (Inspections and visible felt leadership engagements) of the working environment to identify the various hazards to which the workers may be exposed to, and to evaluate the effectiveness of occupational health and safety controls and protective measures. Provided docs confirm the existence and role of the health and safety committees at Mogalakwena. The health and safety agreement does not state that the committee is to carry out workplace inspections, although they review the results of industrial hygiene (IH) and other monitoring and health and safety representative inspections. Provided evidence did not demonstrate that the workers representatives participate in these inspections, which appear to involve a team of health and safety technical personnel and a senior foreman. Discussions during the on-site assessment indicated that worker representatives do participate in some area inspections and are often engaged during health and safety committee inspections. A large portion of the business partner (contractor) workforce does not have official representation, however, and while union-based representatives were recognized as typically acting on behalf of the wider worker population, some workers suggested that their concerns were not being addressed through the inspection process.
3.2.5.2.	The operating company shall carry out workplace monitoring and worker health surveillance to measure		Workplace health and hygiene monitoring is conducted by qualified personnel. Confidentiality is required under South Africa law and the mine is careful to meet legal requirements. Recognized

exposures and evaluate the effectiveness of controls as follows:

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.

methods are used, and accredited laboratories are used for sample analysis.

Mandatory Codes of Practice (MCOPs) are drafted as a guide for the occupational hygiene monitoring program, and monitoring is conducted or overseen by a certified occupational hygienist.

Anglo American and contractor employees reported receiving hearing tests and workplace physicals. The mine requires evidence of "fitness for work" evaluations before contractors are allowed on-site.

3.2.5.3.	Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results.		The baseline risk assessment is under constant review. Workplace hygiene inspections are conducted to ensure that controls are in place and still adequate. Safety inspections are conducted to ensure safety in workplaces. Change management is done when new processes are introduced and when there are changes in processes. Risk assessments are conducted at all levels of work and on a continual basis. Induction is done by all employees on an 18-month basis to ensure that employees are still conversant with health and safety requirements and processes. Employees are trained in specific control measures in place to ensure that they can protect themselves should a situation arise. The documentation provided supports the statement above related to risk assessment. Also, there is some evidence that up-to-date training is provided. The baseline risk assessment was last updated in 2020. Update frequency and necessary triggers for updating all required training, etc. is not clear from provided evidence. (i.e., there is no over-arching procedure or requirement.)
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.		All workplace injuries, fatalities, accidents, and dangerous occurrences are documented and logged into the electronic incident management system (Isometrix). Workplace injuries, fatalities, accidents, and dangerous occurrences are investigated accordingly in line with the incident management and reporting procedure. Workplace injuries, fatalities, accidents, and dangerous occurrences are reported to the Department of Mineral Resources and Energy, as required by legislation. Appropriate remedial actions are carried out in response to all workplace injuries. Provided documents verify that there is an investigation process followed for at least some relevant incidents, support the information captured on Isometrix to manage actions close-out, and confirm that at least some incidents are reported to the Department of Mineral Resources of Energy, as required.

			Interviews during Stage 2 indicated that workplace injuries, fatalities, accidents, and dangerous occurrences are generally reported and investigated. Discussion during the assessment, however, suggested that contractors who have no formal written contracts would be reluctant to report any incidents, as they have no protection against termination.
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.		Records are mainly covered / captured on different systems including Isometrix and Q-Med and are supported by Excel sheets and related documentation. Review of various documentation supports the claim that risk assessments are documented and retained. Also, data related to health surveillance, occupational injuries, diseases, accidents, fatalities, and dangerous occurrences were collected by the company and submitted to competent authorities. During the site assessment, discussions confirmed that elected safety representatives are part of the health and safety committee and conduct regular inspections., so they are involved in data collection and evaluation through that process.
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 heath data management system.		The mine states that there is a health data management system, with assigned custodians, in place for storage and disposal after 30 years. Medical surveillance information is captured on the Q-Med system. The system keeps the information for as long as the mine operates, and for 40 years in line with national laws. Provided information relates only to database security and preventing data loss. The information provided as evidence for other questions does confirm the 40-year retention policy and the Q-Med or other secure filing system. However, there is no confirmation that the retention policy is coded into the system in such a way to enforce the required retention and make it verifiable. Standards officers oversee data management.

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.		Mogalakwena Mine allows workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations. Notes further state that records will be kept in a medically confidential manner at occupational health centers and computerized network records will have appropriate access controls. These may be made available only in accordance with the ethics of medical practice, or if required by law or court order, or if the employee has in writing consented to the release of the information (section 15 of Mine Health & Safety Act (MHSA)). 7.6.4 Employees are entitled to copies of, or copies of parts of, medical surveillance records or records of occupational hygiene measurements that relate to themselves (section 19 of the MHSA). The provided Code of Practice includes much of the same text above but states the information is found in "Guideline for the Compilation of a Mandatory COP on the Roles and Responsibilities of Occupational Health Practitioners in a System of Medical Surveillance on a Mine (DMR 16/3/3/3-A7)." This document was not provided.

Chapter 3.3—Community Health and Safety		Basis for rating
3.3.1.1.	**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: 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	According to the operator, the health impact assessment (HIA) was approached in a phased manner as per the Social Way Section 4C methodology, initiating with a scoping study that was concluded in March 2021, and followed up from May to September 2021 with baseline data collection to better understand the internal and external context. Importantly, and as per the 4C guideline, the HIA is considered to include both community health and community safety considerations, and thus any reference to the HIA or health impacts in isolation, is considered to include community safety as relevant. Mine personnel stated that the assessment was outsourced and was consistent with IRMA requirements. Review of the scoping report appears to indicate that it is complete and meets IRMA requirements. Site verification did not reveal any current significant potential risks and impacts to community health and safety that had not already been identified. Risks throughout the life cycle of the mine had not been thoroughly explored, however.

	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.		
3.3.1.2.	Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure).	◐	Mine personnel noted that the life of mine is extensive, and a closure/post-closure risk assessment is not fully developed and stated that the scoping report does not address closure or post-closure. There are closure and post-closure planning activities that are led by the group's safety, health, and environment department. Scoping acknowledged that closure and post-closure risks were not practical to consider in detail, as the life of mine was expected to be long, and scoping for immediate concerns related to the operating mine was a higher priority. According to the mine closure plan, the mine has put in place mechanisms to ameliorate social and economic impact on individuals, regions and economies that form part of the social and labor plan commitments as part of closure. Specific actions include a range of local economic development (LED) projects involving education, sanitation, food security, etc. The mine closure plan notes that no formal stakeholder engagement was conducted to compile the closure plan, as the mine is still several decades away from closure. Future stakeholder engagement will follow a phased approach, as the mine closure plan is further advanced, and the closure criteria are amended/refined towards the development of the detailed and then final mine closure plan. Increasing stakeholder engagement

			will be required as the mine closure plans are refined and developed.
3.3.1.3.	Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities.	●	A separate vulnerability study was conducted to identify vulnerable groups and susceptible members of the community. Mine personnel stated that the baseline risk assessment addresses various community impacts including vulnerable groups. Site verification did not reveal any differential impacts on vulnerable and susceptible groups that had not already been identified.
3.3.2.1.	The operating company shall carry out an assessment of risks and impacts to: 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.	●	According to the operator, the assessment is intended to be used as a decision-making tool that identifies and estimates the significant or lasting changes of different actions on the community health and safety status of a defined population, who may be affected by the site, and to support the development of evidence-based recommendations to avoid or prevent hazards that may lead to an unwanted event or mitigate or manage the consequences of the unwanted event. The assessment also considers potential risks to the business from a community health and safety perspective. The health impact assessment was approached in a phased manner as per the Social Way Section 4C methodology, initiating with a scoping study that was concluded in March 2021 and followed up with baseline data collection from May to September 2021 to better understand the internal and external context. Importantly, and as per the 4C guideline, the health impact assessment is considered to include both community health and community safety considerations, and thus any reference to the health impact assessment (HIA) or health impacts in isolation is considered to include community safety as relevant. Social risks are included in the baseline social risk assessment, which is updated on an ongoing basis - most recently in August 2023.

			Reviews are updated frequently based upon changing conditions, including site-induced migration into the area.
3.3.3.1.	The operating company shall document and implement a community health and safety risk management plan that includes: 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.		As stated by the operator, the community health and impact assessment identified social impacts, and the action plan was developed in relation to each planned project. The monitoring thereof is done through the Smartsheet tracker for each project based on its execution timeline. Identified social impacts of significant importance (Level 4 & 5) are prioritized based on the budgeted projects with relation to phases of construction. Mine personnel stated that issues that are identified as critical, and associated controls, are reviewed by the site leadership team on a regular basis to evaluate the effectiveness of controls. The Isometrics tool is used to ensure actions are implemented and closed. As many mine employees live in neighboring and embedded communities, many mine environmental, health, and safety programs overlap with community programs, such as emergency response and road safety. After scoping in 2021 and collecting health data from local authorities, a community health and safety management plan was developed in 2022. The management plan has an external and internal component. Internal references impact of the mine operations. The external plan focuses more on collaboration with external stakeholders. Related activities include work with clinics, education programs, the social labor plan (approved since Stage 1), resettlement, and emergency preparedness. The community health and safety management plan did not fully address issues throughout the mine life cycle, as the scoping of potential impacts for such was not complete.
3.3.3.2.	Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation.		The hierarchy of control approach is applied to avoiding risks when conducting a risk assessment. All controls defined in risk mitigation

			were classified based on their effectiveness and hierarchy type, as per the operational risk management specifications. Mine personnel stated that the approach is based upon hierarchy of control with preference to avoid or prevent issues. This is reflected in the management plan. As an example, eleven community clinics have been established in the area to implement programs addressing issues such as HIV, teen pregnancy, and other issues identified in the community management plan. During the Stage 2 assessment, there were several reported and one observed incident of livestock entering the mine and falling into a ditch or otherwise becoming injured or trapped. Community members were also entering the mine to herd or recover livestock. This indicates one aspect where the mine was reacting to community impacts rather than taking more effective steps to avoid them.
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 community health and safety management plan was updated in 2021 based on the results of risk and impact monitoring, and responsibilities were assigned as necessary. Social risks are included in the baseline social risk assessment, which is updated on an ongoing basis - most recently in August 2023. Reviews are updated frequently based upon changing conditions, including site-induced migration into the area. The community health and safety management plan was scheduled for a full update by the end of 2023. Organizational changes led to delays, but an action plan for the update was developed, and work has started.
3.3.4.1.	If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure		The assessment rated a variety of scenarios using the Anglo American operational risk management methodology. From this assessment, unwanted events were further identified, and controls determined. Coach Mpilo and Zvandiri are examples where the

	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: 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.		operation works in partnership with relevant stakeholders to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining. The operation shares with workers and other relevant stakeholders (including the regulator) relevant information regarding risks and impacts of these diseases and the best practices for preventing and treating them. Using a number of platforms including safety, health, and environment and environmental, social, and governance reporting, the operation publishes information about its infectious disease mitigation program. During the pandemic, COVID-19 testing and awareness was also conducted for employees and within the communities. Mine personnel noted that there are several programs related to HIV and other infectious diseases. The mine provides various community communication tools and support, such as data tools, for clinic and outreach workers. The mine also provides various support and outreach programs for ongoing community support such as orphans (because of COVID-19). COVID-19 was managed on-site, and the site partners with the Department of Health and non-governmental organizations to manage community clinics and outside issues. There are also on-site campaigns related to HIV, TB, and STDs. There are current challenges, as the memorandum of understanding between the mine and the Department of Health for operation of external clinics has expired, but it is in process of renewal.
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:	●	Programs are in place to manage the specified infectious diseases. Employees are offered free testing and treatment through site clinics. There is a minimum government program, but the site program includes follow-up and monitoring for any chronic conditions, including infectious diseases.

a. In relation to HIV/AIDS, the operating company shall, at minimum: 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. 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.	Malaria is not endemic in the mine area. The site does have to manage some malaria-infected individuals but has no need for a vector control program.

	c. In relation to malaria, the operating company shall, at minimum: 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.		
3.3.5.1.	The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in: 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.	◐	Several measures and programs were developed to continually assess the mining impact on doorstep communities' health and safety, and documentation speaking to the development of several initiatives was provided by the mine, namely community oriented primary care (COPC), health impact assessment (HIA) and the Mogalakwena Resetting Relationships Project (MRRP) community health context (CHC), all of which have a contextualized approach. . Evidence provided does not confirm that relevant programs were implemented in all affected communities. Committees are established for community clinics (11 in catchment area). Three of them were initially engaged by the mine as part of a pilot program. The selection was made by the Department of Health, based upon the size and opening hours. The mine determined that this was a manageable start and will incorporate others into future updates of the social labor plan. The mine closure plan notes that no formal stakeholder engagement was conducted for the compilation of this closure plan, as the mine is still several decades away from closure. Future stakeholder engagement will follow a phased approach, as the mine closure plan is further advanced, and the closure criteria are amended/refined towards the development of the detailed and then final mine closure plan. Increasing stakeholder engagement

			will be required as the mine closure plans are refined and developed.
3.3.6.1.	The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.		Mogalakwena mine, through the Anglo American Platinum sustainability report, publishes information about community health and safety risks and impacts and monitoring results online on a publicly accessible website. The information published discusses material issues to Anglo American Platinum in the health and safety context: COVID-19 (and vaccination program), HIV/AIDS and TB management, occupational health exposure, noise management and hearing conservation, and fatigue management. The publication addresses the companies' ambition and target, the goals, approach taken, compliance scope and progress measurement. Mine personnel noted that social plans are shared with communities and employees through newsletters, the website, and the social and labor plan, and are published in the sustainability report. An improved social and labor plan was publicized through the local radio station, and books were provided to tribal authorities and various other community bodies, including libraries. These were also published in the Mogalakwena Times, a monthly 12-page newsletter. Interviews with community stakeholders indicated that there were some areas where communication could be improved. Although most community members were aware of some of the relevant health and safety impacts and monitoring results, there is room for improvement.

Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas			Basis for rating
3.4.1.1.	The operating company shall conduct a screening analysis, based on evidence from credible sources, to determine whether or not the mining project is located in and/or sources minerals from a conflict-affected or high-risk area.	●	Evidence provided and on-site management interviews indicate that the group supports the site in undertaking a thorough quarterly screening to determine whether the site or any sources of minerals are located within a conflict-affected or high-risk area. South Africa is not considered a conflict-affected area. The sources provided and methodology used are considered credible. The quarterly country risk analysis reviews a broad range of potential risks including political unrest, elections, and illegal mining issues. Group protection services and third-party services provide alerts and track emerging risks, including social unrest. Since 2018, the country risk analysis has included trends and monitoring of incidents. Monthly meetings are held with South Africa police services to track local conflict and emerging issues with other mining houses in the area. Supply chain due diligence samples, undertaken on an annual basis, were not provided for review. However, from management interviews there is no indication that minerals are sourced from a conflict-affected or high-risk area.
3.4.1.2.	If a determination is made that the mining project is located in a conflict-affected or high-risk area or it sources minerals from such areas, then the operating company shall undertake the additional due diligence steps outlined in the remainder of this chapter.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.

3.4.1.3.	If a determination is made that the project is not located in a conflict-affected or high-risk area, and no minerals are sourced from those areas, then conflict-related risks shall be monitored at a level commensurate with the potential that the project area may become a conflict-affected or high-risk area and/or minerals from such areas may enter the mine's supply chain. If new risks emerge or previously identified risks intensify, screening shall take place to determine if risks are significant enough to warrant undertaking the additional due diligence steps in the remainder of this chapter.		Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area. The site screens for a range of potential conflicts quarterly, tracking local protection services incidents monthly and performing supplier due diligence monitoring on an annual basis.
3.4.2.1.	When operating in or sourcing minerals from a conflict-affected or high-risk area, the operating company shall not knowingly or intentionally cause, contribute to or be linked to conflict or the infringement of human rights by any party, or knowingly provide direct or indirect support to non-state armed groups or their affiliates, public security forces, or private security forces who:		Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.

	a. Illegally control mine sites, transportation routes and upstream actors in the supply chain; b. Illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or c. Illegally tax or extort intermediaries, export companies or international traders.		
3.4.2.2.	When operating in a conflict-affected or high-risk area, the operating company shall: a. Adopt and communicate to the public and stakeholders a commitment that when operating in a conflict-affected or high-risk area the operating company will not knowingly or intentionally cause, contribute to or be linked to conflict or the infringement of human rights by any party; b. Maintain documentation on the quantity and dates of mineral extraction; quantity and dates of minerals obtained from other sources (e.g., from ASM); locations where minerals are consolidated, traded or	—	Evidence provided and on-site management interviews indicate the site is not in a conflict affected or high-risk area and therefore is rated as Not Relevant.

	processed; all mining-related taxes, fees, royalties or other payments made to governmental officials for the purposes of extraction, trade, transport and export of minerals; all taxes and other payments made to public or private security forces or other armed groups; identification of all actors in the upstream supply chain; and transportation routes. This information shall be made available to downstream purchasers and auditors and to any institutionalized mechanism, regional or global, with the mandate to collect and process information on minerals from conflict-affected and high-risk areas; c. Assign authority and responsibility to senior staff with the necessary competence, knowledge, and experience to oversee the conflict due diligence processes; and d. Ensure that stakeholders have access to and are informed about a mechanism to raise conflict-related concerns or grievances.		
3.4.3.1	The operating company shall assess the risks to the company, workers, and communities associated with	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.

	operating in or sourcing materials from the conflict-affected or high-risk area. Assessments shall include, at a minimum: a. Analysis of structural, root, and proximate causes of the current conflict, and potential triggers of conflict in the area of operation; b. Review of the factual circumstances of the operating company's mineral extraction, transport, and, if relevant, mineral sourcing and/or processing; and c. Analysis of the risk that any of the company's activities may lead to the direct or indirect infringement of human rights, support of armed groups or otherwise contribute to conflict.		
3.4.3.2.	Assessments shall follow a recognized risk assessment methodology, and be carried out and documented by competent professionals.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.
3.4.3.3.	Assessments shall be based on credible evidence including on-the-ground research, expert advice, and information from consultations with relevant stakeholders, including men,	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.

	women, children (or their representatives) and other vulnerable groups.		
3.4.3.4	Conflict risk assessments shall be updated at minimum, on an annual basis, and more often if necessitated by the situation.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.
3.4.4.1.	The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate risks identified through the risk assessment process.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.
3.4.4.2	The operating company shall collaborate with relevant stakeholders to develop culturally appropriate strategies to prevent or mitigate risks that are relevant to them; to develop performance objectives, timelines and indicators to measure the effectiveness of the risk management strategies; and to update or revise its prevention and mitigation strategies as needed.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.
3.4.4.3	If risks to human rights are identified in the assessment, the operating	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.

	company shall adhere to the requirements in IRMA Chapter 1.3.		
3.4.5.1.	The operating company shall implement and monitor the effectiveness of its risk management plan as per the performance objectives, timelines and indictors developed with stakeholders.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.
3.4.5.2.	If through monitoring or some other means it is discovered that the operating company has unknowingly or unintentionally been complicit in armed conflict or serious human rights abuses in conflict-affected or high-risk areas, the operating company shall immediately cease or change the offending action, mitigate or remediate the impact, and carry out external monitoring of its due diligence activities as per as per IRMA Chapter 1.3.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.
3.4.6.1.	The findings of conflict risk assessments, risk management plans and monitoring shall be reported to senior management of the operating company; and stakeholders, contractors, mine workers and other	●	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area. However, the results of conflict risk assessments are reported to senior management on a quarterly basis and to stakeholders annually through environmental social governance reporting.

	employees shall be informed of findings that are relevant to them.		
3.4.6.2	On an annual basis, where the operating company is operating in or sourcing minerals from a conflict-affected or high-risk area, the company or its corporate owner shall publicly report on due diligence undertaken to ensure that its actions are not supporting armed conflict or the infringement of human rights in those areas.	—	Evidence provided and on-site management interviews indicate the site is not in a conflict-affected or high-risk area and therefore is rated as Not Relevant.

Chapter 3.5—Security Arrangements		Basis for rating
3.5.1.1.	The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force.	● The operating company's code of conduct and human rights policy are publicly available. On-site management interviews indicate that the human rights policy has been modified to make it relevant to South Africa requirements of law. Certification of private protection services follows South Africa requirements and includes voluntary principles on security and human rights training. Evidence provided does not indicate the site would support a private security force implicated in a human rights infringement, the use of excessive force or breach of humanitarian law.
3.5.1.2.	**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: 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	● Evidence provided and on-site management interviews indicate that the site has implemented policies and procedures consistent with South Africa firearm requirements, including an operational procedure on the handling, use and storage of firearms and ammunition. The use of force continuum demonstrates the steps to be taken to exercise restraint and non-violent approaches. No incidents were reported by management or during external stakeholder interviews where excessive force was utilized. Similarly, no incidents were reported of protection services' use of firearms. If an incident were to be evaluated as potentially violent, South Africa Police Services would be contacted to manage and resolve the situation.

	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.		
3.5.1.3.	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: 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.	●	The site employs two business partners to provide protection services to the site, supporting and complementing the services provided by permanent full-time employees. The site utilizes a hybrid security model, with Anglo American employees taking the lead in higher risk protection services assignments. Special conditions of the services agreement reviewed commit the protection services provider to the group rules of engagement standard, international human rights declarations, principles, and codes of conduct, including the voluntary principles on security and human rights. The service agreements reviewed also specify training requirements for all protection services staff, consistent with certification under South Africa law, as well as voluntary principles training.
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 similar agreement with public security	—	The site does not utilize public security forces to provide security services. This criterion is therefore rated as Not Relevant. Evidence provided that South Africa Police Services (SAPS) does not provide security to the site but does potentially respond to an unlawful incident. SAPS does not negotiate agreements or memorandums of understanding (MOUs) but does participate in local industry security forums.

	providers that includes similar provisions to those in 3.5.1.3.		
3.5.2.1.	The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment.	●	Evidence provided, supported by on-site management interviews, indicates that the site tracks and reports monthly to senior management on protection services incidents, and quarterly on broader conflict indicators. The site also collaborates with South Africa Police Services and other mining houses through a mine crime combatting forum. Interviews with external stakeholders did not report instances of human rights impacts related to security arrangements.
3.5.2.2.	Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall: a. Follow a credible process/methodology; b. Be carried out and documented by competent professionals; and c. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice.	●	Evidence provided indicates a social and human rights risk assessment was undertaken in 2021. Facilitated by a group of human rights risk specialists, the assessment follows a credible methodology and has been updated by a broader quarterly conflict analysis and monthly protection services incident reports. Assessments are also informed by regular mine crime combatting forum discussions.

3.5.2.3.	The scope of the security risk assessment shall include, but need not be limited to: a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups; b. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption); c. Analysis of current and potential conflicts or violence in the host country and affected communities; and d. Risks associated with equipment transfers.		Evidence provided regarding security risk assessments and complementary country conflict risk analysis indicates a thorough process for understanding security risks and controls to the company, workers, communities, and vulnerable groups. Analysis of the political and security context is updated quarterly, with protection services incidents added monthly and supply chain due diligence annually.
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 transition and improvement plan, proactive security social risk and impact review, and action planning documents indicate development and implementation of a security risk management plan but do not include monitoring indicators that demonstrate effectiveness of controls.
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 improvement and transition plan, and operational plans provided indicate planning for conflict events but do not demonstrate collaboration with communities or workers on

	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.		development of mitigation strategies that protect vulnerable groups or are designed in a culturally appropriate manner.
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.		The operating company utilizes multiple screening and due diligence processes (employee screening, Passport 360 background, police criminal record checks and identification verification, polygraph testing) as required. The Responsible Sourcing Standard for Suppliers agreement terms and monitoring prevent the hiring of individuals or suppliers implicated in human rights abuses.
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.		The operating company does not utilize public security personnel to provide security services. This criterion is therefore Not Relevant. Evidence provided that South Africa Police Services (SAPS) does not provide security to the site but does potentially respond to an unlawful incident.

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.	●	Service agreements reviewed stipulate the training requirements for protection services personnel consistent with South Africa law. All protection services employees and contracted workers also receive voluntary principles training and must adhere to the company's policy and procedures on handling, use, and storage of firearms and ammunition. The group behavioral policy and use of force continuum also underpin training expectations for all protection services staff, employees, and contracted workers.
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.	—	The operating company does not utilize public security personnel to provide security services. This criterion is therefore Not Relevant. Evidence provided that South Africa Police Services (SAPS) does not provide security to the site but does potentially respond to an unlawful incident.
3.5.5.1.	The operating company shall: a. Develop and implement systems for documenting and investigating security incidents, including those	●	The site utilizes a spreadsheet system to document security-related incidents. Any required discipline of Protection Services staff is managed by employee relations and/or by the contracted business partner. Depending on the nature of the incident, information may also be referred to the South Africa Police Services if the victim

	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.		agrees with the referral. Disciplinary action follows the same process as for any other employee. The operating company would expect contracted protection service workers to face a similar disciplinary process and may elect to refuse future access to the site as circumstances warrant. An incident report shared detailed the provision of medical assistance to a person who fainted while attempting to steal company property. While safe to do so, external stakeholder interviews indicated that grievance procedures were not used frequently.
3.5.5.2.	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	—	Based on evidence provided and on-site management and external stakeholder interviews, there have not been any security-related incidents that have resulted in injuries, fatalities, or human rights impacts. This criterion is therefore Not Relevant.

	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.		
3.5.6.1.	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.		The safety health and environmental management policy provided for review specifically commits to providing information on company policies and procedures as requested.
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 provided indicates efforts by the operating company to engage with communities and the police service on security risks and issues. The engagement is supported by Anglo American sustainability and voluntary principles reporting on an annual basis.
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.		Based on evidence provided and on-site management interviews, external stakeholders have access to a grievance mechanism that could be utilized if there were any security-related concerns (a collaborative process between protection services and social performance personnel). However, external stakeholder interviews indicate that the existing grievance mechanisms are utilized infrequently and are unlikely to be used for this purpose.

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.	—	The operating company does not utilize public security personnel to provide security services. This criterion is therefore Not Relevant. (SAPS) does not provide security to the site but does potentially respond to an unlawful incident.

Chapter 3.6—Artisanal and Small-Scale Mining		Basis for rating
3.6.1.1.	When the large-scale mining (LSM) operating company has identified the presence of artisanal and small-scale mining (ASM) entities on the LSM concession or in close proximity to LSM operations, the operating company shall carry out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring.	Based on the evidence provided through due diligence, baseline and social and human rights risk assessment processes, the operating company identified commercial and community interest in an unconventional artisanal and small-scale mining operation focused on non-mineral processing of mine waste rock into sand and gravel (aggregate materials) for multiple construction purposes, some of which may in turn be procured by the site. A 2021 artisanal and small-scale mining context review describes the legal, social, and environmental context for proposed activities, complemented by related risk assessments and a 2022 management plan.
3.6.2.1.	When the operating company has identified the presence of ASM on or in close proximity to its mining project, and where there is no material risk to company personnel, it shall: a. Make a good faith effort to engage with ASM entities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts (See IRMA Chapter 1.2); b. Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning;	Based on the evidence provided and on-site management interviews the operating company has engaged with a commercial interest in unconventional non-mineral processing of the site's waste rock. A presentation for community discussion was provided for review identifying geo-located areas for artisanal and small-scale operations to occur. The artisanal and small-scale management plan was informed by stakeholder engagement. The commercial entity has received a permit from the Department of Mineral Resources for a 10-year period and participates in periodic safety day events with the operating company. During management interviews, the site notes that future surface artisanal and small-scale aggregate processing of waste rock will be possible with no interaction with underground mining operations. A community grievance mechanism is available to affected communities. However, external stakeholder interviews during the on-site audit indicate there is not a general awareness or use of this grievance procedure.

	c. Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and d. Inform ASM entities and communities that there is an operational-level grievance mechanism available to raise concerns and resolve conflicts related to the LSM operation (See IRMA Chapter 1.4).		
3.6.3.1.	The operating company shall ensure that mine security personnel are trained in respecting the human rights of individuals engaged in ASM activities, and members of affected communities.		Based on evidence provided and on-site management interviews, Protection Services personnel receive voluntary principles on security and human rights training. Non-mineral artisanal and small-scale operations are undertaken within a legal, permitted, commercial context. External engagement during the on-site audit indicates similar additional artisanal and small-scale operations are the subject of ongoing discussions between the company and affected and interested communities.
3.6.3.2.	The operating company shall demonstrate that it has considered opportunities to enhance positive safety, environmental and social impacts of ASM activities for the benefit of ASM entities and host communities.		Evidence provided demonstrates several means to enhance the safety and security of artisanal and small-scale activities and reduce negative environmental and social impacts such as dust, water usage and noise. However, the artisanal and small-scale mining management plan and on-site management interviews note challenges in implementing controls, especially with respect to potential informal or illegal artisanal and small-scale mining aggregate processing operations that may arise in the future.
3.6.4.1.	When the LSM mine sources minerals from or has other commercial relationships with ASM entities, the operating company shall:		Evidence provided and on-site management interviews indicate that the operating company has assessed the environmental and social risks associated with processing into sands and gravel for multiple construction purposes, some of which may be procured by

	a. Regularly assess the social and environmental risks and impacts related to the ASM entities with whom they have a commercial relationship; b. Collaborate with those ASM entities with whom it can legally and legitimately engage to develop and implement a plan to eliminate or mitigate the most significant risks, and over time, address other social and environmental risks related to those ASM operations; and c. monitor the effectiveness of mitigation strategies, and adapt plans as necessary to facilitate continued minimization of risks.		the operating company. It has also created a commercial relationship with an artisanal and small-scale mining entity. External engagement during the on-site audit indicates additional community / commercial interest in waste rock processing for aggregate materials. However, the artisanal and small-scale mining management plan identifies risk of illegal aggregate processing activities within the mine site, combined with a current limited ability to monitor the effectiveness of controls.
3.6.4.2.	When the LSM mine has commercial relationships with ASM entities that are located in conflict-affected or high-risk areas, the operating company shall carry out due diligence related to those ASM entities as required in IRMA Chapter 3.4.	—	From evidence provided and on-site management interviews, the site is not located in a conflict-affected or high-risk area. Therefore, this criterion is Not Relevant.

Chapter 3.7—Cultural Heritage			Basis for rating
3.7.1.1.	Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals.		Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage were performed and is currently performed by competent professionals. Cultural heritage (CH) impact assessment reports were developed by specialized consulting companies. Management of the CH sites (including grave relocation) is performed by the cultural heritage professionals.
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.		Engagement with stakeholders took place during an environmental impact assessment (EIA) disclosure that included a discussion of the results of assessment, mitigation measures and procedures related to the management of cultural heritage. A cultural heritage stakeholder engagement framework was developed. It is not clear whether engagement to support assessment and development of mitigation measures was performed for all cultural heritage sites. A community highlighted that access to an area of significance may be impacted by the mine development. The community believes that discussions regarding access to this area did not undergo adequate consultation. The land in question holds significant value for the community, as it provides traditional herbs, wells, important relics, and graves are located at this land. There is a burial grounds and grave relocation procedure that was developed for the relocation of graves. It guides stakeholder engagement during this process. It should be noted that during engagement with stakeholders it was revealed that not all stakeholders fully understand the burial grounds and grave relocation procedure and associated compensation framework and requirements.

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.		Cultural heritage impact assessment results are publicly available on the South African Heritage Resources Agency online platform. Results of the cultural heritage impact assessment were shared through the environmental impact assessment (EIA disclosure. (EIAs for various project components include results of the cultural heritage impact assessments). One request was received regarding cultural heritage impact assessment results, and relevant data was provided to a stakeholder. Regular community engagement is in place.
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.		Per local legislation, cultural heritage impact assessments are required for all new projects/expansions, and this was done for the project. Results of the screening are aggregated in the form of cultural heritage Inventory 2023. All cultural heritage sites located within the area of potential effects of the projects were identified and recorded. For most cultural heritage sites, potential risks and impacts were assessed as part of the relevant cultural heritage impact assessments. There is no evidence that all potential effects were assessed for each of the cultural heritage sites. At the same time, potential effects are similar for groups of closely located cultural heritage sites.
3.7.2.2.	If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and		Per local legislation, cultural heritage impact assessments (IAs) are required for all new projects/expansions. This was done for the various new subprojects of the mine. Cultural heritage impact assessments and mitigation measures implementation reports were available for review. Cultural heritage impact assessments include a description of potential effects on the identified cultural heritage sites and proposed mitigation measures. All cultural heritage sites located within the area of potential effects of the mine were identified and recorded. A mitigation strategy was identified for all of them. Potential effects were assessed for groups of the cultural heritage sites. This may lead to situations when some specific effects are missed. However, this approach is reasonable for

	3.7.6), based on the type of cultural heritage likely to be affected.		most cultural heritage sites, as potential effects are similar for the groups of closely located cultural heritage sites.
3.7.3.1.	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: 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.	●	Cultural heritage impact assessments include a description of potential effects on the identified cultural heritage sites and proposed mitigation measures. The draft cultural heritage sites inventory 2023 includes identification of mitigation measures for all cultural heritage sites. Avoidance is the first recommended mitigation measure. a. Cultural heritage impact assessments with the list of mitigation measures were provided for a review, including information about exclusion zones (avoidance), graves removal and stone age sites (removal). For some cultural heritage sites, exclusion zones are recommended as a way to avoid impacts on cultural heritage sites. Blinkwater redesign shows measures implemented to avoid effects on some cultural heritage sites. b. For some cultural heritage sites, relocation is recommended. Relocation of graves is performed in accordance with the burial grounds and graves procedure. c. At the time of the audit, there were no plans to permanently remove historical and archaeological artifacts and structures. d. The burial grounds and graves procedure defines compensation for the grave relocation.

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.		Management of the cultural heritage sites (including grave relocation) is performed by specialized contractors.
3.7.4.1.	The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met: 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.		There are several known tangible non-replicable observations within the Mogalakwena primary area of influence. These sites remain in place. The mitigation approach for these sites is to "avoid." Exclusion zones were developed by external specialists. Requirements for tangible non-replicable cultural heritage is encapsulated in the Cultural Heritage Management Strategy, with which the Mogalakwena Cultural Heritage Management Plan is aligned.
3.7.4.2.	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.		There are several known tangible non-replicable observations within the Mogalakwena primary area of influence. These cultural heritage resources remain in situ and no mitigation has been undertaken to date or is planned in the immediate future. The mitigation approach for these sites is to "avoid." Exclusion zones were developed by external specialists. Requirements for tangible non-replicable cultural heritage is encapsulated in the Cultural Heritage Management Strategy, with which the Mogalakwena Cultural Heritage Management Plan is aligned. The Mogalakwena Cultural Heritage Management Plan doesn't include a specific requirement regarding mitigation work involving tangible non-replicable cultural heritage. in particular requirements regarding involved professionals and practices used for the protection of cultural heritage.

3.7.5.1.	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: 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).	—	No cultural heritage occurs within the Mogalakwena Mine or the defined cultural heritage area of influence.
3.7.5.2.	When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or	—	Mogalakwena Mine is not a new mine. Furthermore, it is not within a legally protected cultural heritage area. A map was provided for a review.

	a legally defined protected area buffer zone, the operating company shall: 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.		
3.7.5.3.	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). • 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.	—	Mogalakwena Mine is not a new mine. Furthermore, it is not within a legally protected cultural heritage, or a biodiversity protected area. A map was provided for a review.
3.7.5.4.	An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:	—	Mogalakwena Mine is not located entirely or partially in a protected area. A map was provided for a review.

	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 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.	—	There are no Indigenous people residing within the area of influence of the mine.
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	—	Mogalakwena Mine has not proposed to use the intangible cultural heritage of local communities.

	proposed commercial development, and of the potential consequences of such development.		
3.7.6.2.	The operating company shall not proceed with such commercialization unless it: 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.	—	Mogalakwena Mine has not proposed to use the intangible cultural heritage of local communities.
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.	—	The Anglo American Social Way Policy seeks to align with the International Finance Corporation (IFC) performance standards. In IFC PS 8, Point 16 considers the use of intangible cultural heritage of local communities. Mogalakwena Mine has not proposed to use the intangible cultural heritage of local communities. There are no Indigenous people residing within the area of influence of the mine.
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.	◔	A cultural heritage management plan was developed for the mine. It serves as a framework for cultural heritage management. It doesn't include specific actions for each of the cultural heritage sites, but rather for the overall approach and requirements. The cultural heritage site inventory 2023 identifies management measures for all cultural heritage sites, but doesn't specify those measures at the implementation level, such as what specifically

			should be done by whom and when. A cultural heritage management plan that includes specific measures for all cultural heritage sites is being developed.
3.7.7.2.	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: 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.		a. A chance find procedure was developed and implemented at the mine. It includes requirements for cases of discovery of cultural heritage, including stoppage of works and required notification procedures. b. A chance find procedure includes requirements for contractors and visitors regarding potential impacts on cultural heritage. c. Chapter conservation and management of living heritage resources of the heritage MP discusses continued access to stakeholders. No information is available regarding relevant consultations. There is a check graves removal procedure. d. No Indigenous people are present within the operation site.
3.7.7.3.	The operating company shall ensure that relevant employees receive training with respect to cultural		Training materials were developed and implemented for Anglo American employees that include a training focused on cultural

awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management.		awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management. There is no evidence that this training is available for contractors.

Principle 4: Environmental Responsibility

RATING LEGEND Description of performance	
●	Fully meets
◔	Substantially meets
◑	Partially meets
⊗	Does not meet
—	Not relevant

Chapter 4.1—Waste and Materials Management	Basis for rating

Note The objective of this IRMA Principle is to assess the management of wastes and materials to verify that the entity addressed the topics of short- and long-term physical and chemical risks, and health and safety of communities, as well as future land and water uses, as indicated by the IRMA Guidance (June 2018). In conducting this assessment, the auditing team exercised professional judgment based on the information available to them, demonstrating the same level of care and skill typically employed under similar circumstances by reputable consultants providing comparable services in the same geographical area. It is important to acknowledge that reasonable individuals may hold differing views on matters involving professional judgment, which could consequently lead to varying opinions on a question of professional judgment. The evaluation of the requirements in this chapter pertaining to the structural stability of mining facilities (such as TSF, open pit, dams, reservoirs, etc.) should not be misconstrued as a certification or a professional engineering assessment of these

structures. The responsibility for certifying the stability or the appropriateness of these structures is outside the scope of the IRMA assessment. Those responsibilities lie solely with authorized technical and governmental organizations.

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.		No separate waste management policy exists, however, the SHE policy identifies waste management to be an environmental risk and commits the Mogalakwena team to minimization of waste and prevention of pollution. The environmental vision is to " always find ways to prevent and reduce harm to the environment (if not restore it) in the way that we design, operate, rehabilitate and eventually close operations, always doing so in an environmentally responsible manner that minimizes pollution and, where possible eliminates or prevent irreversible environmental impacts." The Safety, Health and Environment (SHE) policy is signed by the general manager and is displayed on notice boards across the site.
4.1.1.2.	The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum: a. Having the policy approved by senior management and endorsed at the Director/Governance level of the company; b. 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 Safety, Health and Environment (SHE) policy is approved by the senior general manager for the complex. The policy is included in the site-wide induction, which is applicable to employees and contractors. There are several site-wide procedures in place to manage the various waste streams generated; however, evidence indicates that their policies and waste procedures are not being fully implemented at the waste salvage yard as well or on-site at the general waste landfill.

	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.		
4.1.2.1.	The operating company shall: 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.		Materials, substances and wastes have been identified, and the required waste classifications have been undertaken. Waste storage receptacles are emptied by the on-site waste management contractor. The required policies and procedures have been developed; however, there is evidence of gaps in the implementation of waste procedures with respect to on-site waste handling and management practices, particularly at the waste salvage yard and the general waste landfill. At the time of the Stage 2, on-site waste management practices such as separation of general and hazardous waste, (hazardous waste lying on bare ground causing hydrocarbon contamination, are not in line with South Africa waste management regulations.
4.1.3.1.	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.		The mine has identified all mineral and non-mineral waste facilities through the following documents: -The integrated water and waste management plan (IWWMP) lists the main water use and waste-related risks for the activities associated with surface water and groundwater impacts. - Tailings monitoring (both Vaalkop and Blinkwater) takes place monthly and minutes are recorded. High priority items are flagged for further investigation and mitigation. - A Global Industry Standard for Tailings Management (GISTM) assessment was undertaken for the Vaalkop and Blinkwater Tailings facilities.

4.1.3.2.	The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include: 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: 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		A geochemical characterization and waste classification study was conducted that includes sample analysis for the waste classification of dirty water containment facilities, tailings facilities, waste rock dumps, pollution control dams, stormwater dams, etc., to assess the potential chemical risks of material contained at the facilities. The site has developed a water balance, but no chemistry balance was available. The details of the past and future underground mining below the TSFs and all water structures need to be included in the site characterization report.

	e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants.		
4.1.3.3.	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: 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);		Supporting evidence provided by the mine indicates the following is carried out: - Independent technical reviews (b) - Internal and external inspections on safety and integrity of tailings facilities including a dam breach inundation study (c, j) - Ground and surface water monitoring In December 2021 (report dated June 2022), a team of external consultants undertook a consequence classification of structures (CCS) for the tailings storage facilities (TSFs) and return water dams (RWDs) at the Mogalakwena Complex, using both the Anglo American TS 602 standard and the Global Industry Standard for Tailings Management (GISTM). The CCS rating was evaluated in accordance with the requirements of the Anglo American technical standard AA TS 602 102, and was based on the currently available inundation maps, dam breach analyses and zone of influences. The CCS rating for all facilities, tailings storage facilities and return water dams was classified as major (a, b, c, d, f). It was recommended that the engineer of record (EoR) should determine factors of safety for realistic scenarios and then consider lower bound scenarios through a risk-based lens. Remedial action should be risk informed rather than strictly based on hurdle factors of safety if risk can be shown to be acceptable where factors of safety do not meet the hurdle levels prescribed by the AA TS technical standard and other reference standards (b, c). In the Sept 2023 quarterly tailings and return water dams report, several repeat conclusions and recommendations were noted:

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.

- Piezometers 5VWP-1FA and 5VWP-2TA reflected increased long-term trends in June and July but were stabilized in August. Buttress construction was reduced, and monitoring was increased. All other piezometer levels at Vaalkop #1 and Vaalkop #2 indicated reducing pore pressure readings in the third quarter.

- Standpipe piezometers 2PZ1, 4PZ2, 4PZ3, 5PZ1, 6PZ1, 7PZ2, 8PZ1, 8PZ2, 8PZ3, 9PZ1, 11PZ1, 11PZ2, 12PZ1, 12PZ2, 13PZ1 and 14PZ1 are irreparably damaged or blocked and need to be replaced.

- All leaking or broken drain outlets at the solution trench must be repaired or extended to enable drain flow measurements to be taken. Jet rodding of the underdrains must be completed at the facilities.

- The ring-stacked heights of the 20 m BW1 penstock towers are greater than 25 m and the red trigger action response plan (TARP) level has been triggered. Crushing of the penstock rings could cause an uncontrolled outflow of tailings and failure of the facility. Sealing and decommissioning these towers is critical. This is a repeat/long-standing finding and requires attention as penstock failure risk increases exponentially with time.

- The return water dams (RWDs) were operated above the maximum operating level during the quarter, indicating that they could have not accommodated the legislated Department of Water and Sanitation (DWS) storm volumes, (i.e., 1:50 year 24-hour storm event for this quarter).

The engineer of record (EoR) has engaged with the relevant Mogalakwena water resource personnel and competent persons to qualify and quantify this matter. This includes a dedicated TSF water balance study / understanding, but an audit of multiple (potentially non-TSF related) water sources being deposited in the RWDs is required (b).

The mine currently has two non-operational tailings facilities (Vaalkop #1 and #2) and one operational tailings facility (Blinkwater

			#1), which will reach end of life sometime in FY2028. Vaalkop is an unlined tailings storage facility (f, g). Pre-feasibility assessments have commenced for the new TSF that is proposed to commence with deposition from FY2028 (f, g).
4.1.3.4.	Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.		Facility characterization is undertaken in the form of quarterly monitoring reviews and the reviews undertaken by the technical review panel (annual). Recommendations are put forward to assist in the management of waste facilities. In 2021, Vaalkop tailings storage facilities (TSFs) stopped operating, and all the tailings were diverted to Blinkwater 1. Rate of rise of the Blinkwater 1 is 6 meter/year, which means the existing Blinkwater 1 tailings storage facility only has 3 years left in terms of life of operation. Blinkwater 2 is in the feasibility stages and is planned to begin construction in FY2025. Most recent mine waste characterization was undertaken in 2019, as per National Environmental Management (NEM): Waste Act and associated waste classification regulations. As processes and facilities have not changed, there has been no need to update the characterization. A risk profile of each tailings facility and return water dam is being managed in line with the data, as studied by each of the specialists (external, 3rd party).
4.1.3.5.	Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected.		In accordance with the Global Industry Standard for Tailings Management (GISTM) principles, stability assessments of the Vaalkop tailings storage facilities (TSFs) - Vaalkop #1 and Vaalkop #2 - using lower bound residual undrained shear strength conditions of the tailings were carried out in 2021. This was done because cone penetration CPTu testing indicated a brittle signature of the tailings stored in these facilities. These assessments yielded results that suggested sub-standard stability performance at both Vaalkop #1 and Vaalkop #2. In response, tailings deposition ceased on Vaalkop #1 and Vaalkop #2 in July 2021

			and December 2021, respectively. Furthermore, Phase 2 buttressing on Vaalkop #1 was stopped in July 2021 and additional Phase 1 buttressing (Phase 1A) was designed for Vaalkop #1. Both facilities were placed under care and maintenance by the end of 2021, and an urgent requirement to extend existing buttressing emerged (to cater for the residual undrained shear strength case as per the Global Industry Standard for Tailings Management (GISTM) guiding principles). The design of this buttress extension was termed the “make-safe” buttress design, the details of which are captured in the SRK report titled “Vaalkop Tailings Storage Facilities Buttress Extension Design for Current Height” issued on 21 July 2022. Since then, all tailings material produced by the complex is being diverted to Blinkwater tailings storage facility (BW1). Over the past 2 years, peer reviewed deformation modeling has indicated that residual undrained conditions are unlikely to materialize. Make-safe buttressing has been partially constructed at Vaalkop #1, and this in conjunction with reducing phreatic levels in the Vaalkop TSFs, has resulted in adequate factors of safety under peak undrained conditions that warrant terminating the make-safe buttressing at Vaalkop #1 and partially constructing the buttressing at Vaalkop #2. On-site verification of the Vaalkop TSFs indicate that buttress construction was terminated in mid-2023. Contractors were demobilized by December 2023. terminated/halted.
4.1.4.1.	**Critical** A risk-based approach to mine waste assessment and management shall be implemented that includes: a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;		Although rigorous risk assessment on the mine waste facilities is undertaken through the site's quarterly and monthly tailings storage facilities reviews, engineer or record, independent tailings review panels, environmental management program and Integrated Water and Waste Management Plan (IWWMP) actions and Global Industry Standard for Tailings Management (GISTM) assessment, the site wide baseline risk assessment is in the process of being updated.

	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).		
4.1.4.2.	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: 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; c. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications;		Alternative locations have been considered as part of the environmental impact assessment processes for the new Blinkwater #2 tailings storage facility, and screening for the new tailings facility has been undertaken. However, the alternative assessments are not undertaken in line with the requirements of the standard. Alternative assessments (as part of the environmental impact assessment) do not include the following requirements: a, e and f. Requirements b, c and d are partially demonstrated. The mine closure plan only makes provision for the closure alternatives associated with the tailings storage facilities and other mine waste stockpiles.

	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).		
4.1.5.1.	**Critical** Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).		The Vaalkop #1 and #2 tailings storage facilities were not designed with liner systems in place (historical facilities). However, Blinkwater #1 does have a liner system. As part of the design of the new Blinkwater #2 tailings facility, the classification of the mineral waste stream will determine the most appropriate lining system. Waste classification is one of the mechanisms that is used to consider best available technologies/best available practices in managing the risks associated with the tailings storage facility. The installation of a liner system most suited to contain the type of tailings waste is the best available practice in terms of tailings management and industry best practices. The site-wide baseline risk assessment, which aims to identify all mine-related activities that have priority unwanted events, is in the process of being revised/updated.

			Tailings deposition ceased at Vaalkop 1 in July 2021 and ceased at Vaalkop #2 in December 2021. These tailings facilities were placed into care and maintenance due to stability concerns, considering the brittle behavior of the tailings and foundations soils. The introduction of waste rock buttressing is the best available practice to prevent catastrophic tailings dam failure.
4.1.5.2.	Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows: 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 c. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes.	◐	The baseline risk assessment and the other assessments (quarterly tailings reviews, Global Industry Standard for Tailings Management (GISTM) assessments, etc.) are periodically reviewed and are used to identify additional controls to mitigate tailings and mine waste facilities failures/catastrophic events. Hazard identification and risk assessment is carried out in accordance with the requirements of the Mine Health and Safety Act. As far as reasonably practicable, the mine attempts to eliminate the risk, thereafter, controls the risk at the source, thereafter, minimizes the risk and thereafter in so far as the risk remains, provides personal protective equipment and institutes a program to monitor the risk. Employees exposed to chemical risks while working in and around mine waste facilities are trained on the safety data sheet associated with each chemical and the risks associated with mine waste facilities. For mineral waste streams, the Vaalkop #1 and #2 tailings storage facilities were not designed with liner systems in place (not a legislative requirement at time of construction); however, Blinkwater #1 does have a liner system. Water collected through the penstock operation is captured through the on-site return water dams and is then treated (where required) before re-use around the mining operation. A waste rock buttress was designed to improve stability on the Vaalkop tailing storage facility. The stockpiling of waste rock buttressing was verified on-site.

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.		Consequence classification of structures (CCS) for the tailings storage facilities (TSFs) and return water dams (RWDs) was undertaken in December 2021 by an external party. The CCS rating was evaluated in accordance with the requirements of technical standard AA TS 602 102, and was based on the currently available inundation maps, dam breach analyses and zone of influences. The CCS rating for all facilities, TSFs and RWDs, was classified as major. Tailings deposition ceased at Vaalkop 1 in July 2021 and ceased at Vaalkop #2 in December 2021. These tailings facilities were placed into care and maintenance due to stability concerns considering the brittle behavior of the tailings and foundations soils. The introduction of waste rock buttressing is the best available practice to prevent catastrophic tailings dam failure. The dam breach study contains inundation maps and potentially affected communities. Cognizant of the existing critical controls framework that the mine has implemented to manage the various TSF's, the baseline risk assessment was not yet finalised at the time of the stage 2 on site assessment.
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.		The tailings review panel (TRP) comprises industry experts and demonstrates inter-disciplinary approaches being considered to prevent a catastrophic, unwanted event. In addition, the mine developed a mineral residue facilities standard that highlights the requirements for mineral residue facilities (MRFs) management, water containment, and water diversion structures management in Anglo American, throughout the life cycle, from site selection and early studies, through design, operation and to post-closure.
4.1.5.5.	The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical		Operation, maintenance and surveillance (OMS) manuals are compiled by external, competent professionals appointed by the mine. Manuals are reviewed between 2 - 3 years dependent on the changes to tailings storage facility (TSF) risks. Separate OMSs are in place for the two TSFs and accompanying return water dams.

controls and closure plan for the facility, that includes: 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; 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		Performance-based, risk-Informed safe design, construction, operation, and closure of tailings storage facilities are the basis of this OMS manual, and implementation is demonstrated through the roll-out of measurable critical controls by the responsible mine competent persons based on the risks identified. The compilation of the OMSs was guided by South African legislation, industry best practices and the Mining Association of Canada's guidance on management and operation of tailings facilities and the guidelines for structure and content of OMS manuals for tailing storage facilities.

	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.		
4.1.5.6.	**Critical** On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: 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).		An assessment was completed of the facility performance against the main trigger action response plans (TARPs) and critical controls during the third quarter of 2023 (June 2023 to August 2023), as well as the various actions to be taken in the case of a non-conformance. Actions to remedy non-conformances are managed through the Isometrix system, where each responsible person is allocated an action with a target date. The monthly monitoring reports, including monthly deposition trends (compiled using the tacheometric freeboard surveys conducted and supplied by the mine) and tailings storage facility (TSF) drone reports (compiled using photogrammetric drone surveys conducted by the mine), were completed. Although the Global Industry Standard for Tailings Management (GISTM) assessment and other risk management measures (Tailings review panels, Engineer of Record reviews etc.) have been completed for the mineral residue facilities, the site-wide baseline risk assessment is in the process of being updated.
4.1.5.7.	The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and		The Operation, maintenance and surveillance (OMS) are reviewed between 2 - 3 years dependent on the changes to tailings storage facility (TSF) risks. The last OMS is dated 2020. Changes to the OMS pertains to any deviation from the original design and includes (but is not limited to) the following:

safety, and prevents or otherwise minimizes harm to the environment and communities.		- Changes to the ore type, mine plan or mineral extraction process, tailings preparation, blending during the operational phase that could impact tailings material properties, production rates (deposition strategy and life of mine; - Change in the consequence classification of structures (CCS) rating and/ or risk rating of the facilities - Recommendations by the engineer of record (EoR) or any other qualified geotechnical professional that undertook an audit or safety review of the facilities - Changes in ownership or organizational structure, and/or individual responsibilities - Changes in the status of the mine (i.e., expansion of the facility/operation, transition from construction to operation, or to temporary or permanent closure, and ultimately post-closure) - Changes in operational or maintenance procedures including changes to any construction materials used for the execution of operational activities, where such a change would result in a deviation from original design intent - Regulatory and/or operational permit changes including updated best practice guidelines for mine waste management Following the September 2023 quarterly tailings and return water dams report compiled by SRK as the engineer of record, several repeat conclusions and recommendations were noted. Some of which relate to the penstocks at Blinkwater and Vaalkop 1, (i.e., penstock rings exceeding heights of 20 m prone to crushing and failure of the rings which could cause an uncontrollable outflow of tailings leading to a failure of the facility). In addition, damage to the penstock rings may result in unduly complicated sealings challenges. The repeat findings in the quarterly reports relate to inadequate management of the operator of the TSFs. While the mine teams have a management system in place, full demonstration of implementation of action plans was lacking in respect of the repeat findings from the various tailings reports

			reviewed. The mine confirmed that penstock towers were sealed in 2024 following the Camera Inspections.
4.1.5.8.	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: 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.		A safety, health and environment (SHE) management system review is held on an annual basis. The management review includes the performance evaluation of waste and water aspects for resource allocation and continuous improvement. The annual tailings technical review panel acts as an additional review. The various role players (engineer of record (SRK), operators (Fraser Alexander Tailings and Concor), and key Anglo American technical specialists meet on an annual basis to ensure all risks associated with catastrophic or unwanted events are being appropriately managed.
4.1.6.1.	The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle.		In line with the objectives, the tailings review panel (TRP) serves the purpose of: • Assisting in identifying and reducing potential liabilities to Anglo American Platinum (AAP) arising from current and future mineral residue facility management at AAP operations • Providing independent opinions and expert guidance to the operations and AAP on the physical integrity, safety, behavior, and performance of earth structures and water management appurtenances associated with the existing mineral residue facility(s) management system and planned additions, expansions, modifications, and closure of this system

			• Providing independent review of the design and operation of the mineral residue deposits with respect to safe and sound planning, design, operation and management practice. Review meetings will be scheduled at regular intervals to suit the studies, projects, construction and operations. The TRP shall convene on-site, on a frequency to be agreed with the general managers and the accountable executive. The frequency of meetings will be dependent on the perceived risk at the particular operation, and as stated in the Standard, typically on an annual basis. In some instances, the TRP may be requested to review and comment upon a specific report, study, investigation, incident or event, in which case TRP meetings may be limited to a teleconference / video conference with a follow-up TRP report. The TRP will maintain a tabulation of recommendations contained in its reports to track the status of associated actions and activities. This tabulation will be updated and appended to the final report issued for each meeting, complete with the standardized prioritization of actions based on urgency and importance. The competent person (CP) will provide feedback on the actions (including timing and prioritization) that will be taken for each TRP recommendation and will manage and monitor progress in an official data management system. Where some of the TRP recommendations are not implemented, the CP should provide reasons for this to the TRP.
4.1.6.2.	Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body.	●	The consequence classification of structures (CCS) for the tailings storage facilities (TSFs) and return water dams (RWDs) was classified as major or extreme as per criteria outlined in the technical standard AA TS 602 and the Global Industry Standard on Tailings Management (GISTM). Quarterly and monthly reviews are undertaken by externally appointed consultants (registered civil engineers in accordance with the South African Qualifications Authority). In addition, the quarterly reports are independent reviews that are undertaken by

			externally appointed registered civil engineers as part of the tailings technical review (TRP) panel (who also report on findings to the Anglo American Platinum Board. The TRP comprises registered, civil and geotechnical engineers from SRK (engineer of record), Fraser Alexander Tailings and Concor (operators). The TRP meeting took place between 1 and 2 June 2022 during which presentations were made by Mogalakwena, the MRF, and SRK (the engineer of record). Due to time constraints, Fraser Alexander and Concor (the operators) did not make their presentations. A site visit was conducted for the first time since COVID-19-related restrictions were introduced.
4.1.6.3.	Independent reviewers shall be objective, third-party, competent professionals.		Independent reviews are objective, third-party competent professionals.
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.		The tailings technical review panel is appointed by one of the executives on the Anglo American board.
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.		Following the September 2023 tailings review panel (TRP) review, the key finding of the review is that no patently significant risks have emerged since the last TRP review in 2022. However, several concerns and recommendations were put forward, namely: - TRP-2023-01: Substandard Construction Execution associated with the development of Blinkwater 1 (BW1). BW1 is a large and relatively unique tailings storage facility (TSF) that needs intensive planning and management. The interface construction does not appear to be managed with the urgency and appropriate action that is required. - TRP-2023-02: "Just in time" Project Execution. Project execution is unacceptably slow. As highlighted in previous TRPs and observed

again this year, a “just in time” situation prevails. This has resulted in the adverse and concerning situation at BW1.

As per the 2022 TRP, the mine is encouraged to:

- Develop a detailed master plan for all TSF-related projects, investigations, studies, etc., part of which is the need for a detailed operational plan for BW1 against which progress is rigorously tracked and managed accordingly.

- Appoint a full-time project manager to manage the master plan and BW1 operations plan.

- The mine is urged to ensure that time, motion, and resource evaluations are undertaken for all aspects associated with the operation and development of BW1, this aspect being part of the BW1 operation plan. Outside contractors should provide this as part of their work scope.

- TRP-2023-03: Depth to Underground workings. The details of the past and future underground mining below the TSFs and all water structures need to be included in the site characterization report. The engineer of records (EOR) should provide comments on what impact the existing and possible future underground mining might have on the stability of the TSFs and water dams.

- TRP-2023-04: Emergency deposition areas. The current operational problems at BW1, along with the anticipated increase in production rate, increases the risk that deposition at BW1 may need to reduce or even stop. Emergency deposition areas should be evaluated.

- TRP-2023-05: Regular spillage for the return water dam (RWD). It was reported that annual spillages have occurred from the current lined/ unlined RWD system, and the Department of Water and Sanitation (DWS) has been informed. This is being addressed with the current construction of a new RWD extension (buffer dam). It is understood that the RWD is managed by the plant manager and not the competent person (CP), which is not ideal given the CP is

			the responsible legal person for the management of all water dams associated with the TSFs. Each trigger action response plan (TARP) conformance status has an associated set of actions to be taken, which are proportionate to the state of conformance. While the mine teams have a management system in place, full implementation of action plans was noted to be lacking in respect of the repeat findings from the various tailings reports reviewed.
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.		As part of the environmental impact assessment process, public participation is a requirement that runs simultaneously with the authorization process. All affected communities are informed of all mine activities before they commence. Community feedback received highlighted a lack of engagement with regards to tailing facility expansion in Sekuruwe
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).		For mine internal emergency response planning development, employee representatives are involved. Final documents are made accessible through a SharePoint portal where any employee can gain access. Evidence shows that an emergency response plan is developed and communicated to potentially affected communities and workers. Related personnel are invited to participate in emergency response planning and provide feedback on various lessons learned and related concerns, which contribute to proposed updates. The mine uses an external disaster management consultant, Disaster Management Solutions (DMS), to assist with developing and updating the community emergency management plan and facilitating supporting activities. Community early warning committees (CEWCs) were set up in 2018 and participated in workshops where they contributed knowledge and experience from their communities. This information was considered, along

			with other sources of community data, when updating the community emergency response plan (ERP). Engagement with various stakeholders is undertaken with respect to emergency preparedness and response. Attendance registers confirm correspondence and direct engagement with stakeholders. Eleven communities were identified as part of the affected areas should the tailings storage facility fail. Emergency preparedness and response planning, communication and development of actions has only involved three of the 11 potentially affected communities.
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).		Available Disaster Management Solutions (DMS) reports showed that only a limited number of affected communities were involved in training and providing related feedback. A tailings dam failure simulation drill was done in August 2020, which involved a new rescue walkway to build a bridge to be able to gain access to the trapped patient in mud. The rescue walkway floated on top of the water or mud to ensure the rescuers can safely gain access to the patient trapped in water or mud or during a tailings wall failure. There is no evidence to illustrate if the surrounding communities were involved in the simulation drill.
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.		A comprehensive grievance procedure is in place that outlines the process for recording and addressing stakeholder requests. No requests have been put forward to the mine to date.
4.1.8.1.	**Critical** At the present time, mine sites using riverine, submarine and		The mine is not using riverine, submarine or lakes for disposing of mine waste.

	lake disposal of mine waste materials will not be certified by IRMA.	

Chapter 4.2—Water Management			Basis for rating
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.	●	As part of the scoping and environmental impact assessment process, all interested and affected parties were identified as part of the 2019 environmental management program (EMPr) authorization process. Stakeholders include all competent authorities and surrounding communities that may potentially be impacted by the operations impacts. Please refer to pages 6-14 of the 2019 approved environmental management program for scoping process and legislative requirements.
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.	●	As part of the environmental management program (2019) authorization process, a surface water specialist study was commissioned to assess the potential impacts on surface water and develop appropriate measures to mitigate the identified impacts. The operating company frequently holds meetings with the local municipality (relevant stakeholder) on water-related matters involving the mine's practices and its impact on potential users. As part of the operating company's water conservation strategy and continuous improvement (research), an agreement has been reached with the Mokopane and Polokwane Wastewater Treatment Works (relevant stakeholder) to supply the mine with effluent water to be used for processing. This will ultimately reduce the water demand for freshwater resources. The mine also has regular engagements with the regional water authorities (relevant stakeholders) to discuss future and current water strategies
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	●	The operating company is involved in water steering committee meetings and engagements with regional and local authorities to identify and address shared water challenges. Several studies that look at local and regional water challenges and future uses have

	opportunities at the local and regional levels, and shall take steps to contribute positively to local and regional water stewardship outcomes.		been commissioned by the mine. One such study was the 'Development of a Water Conservation and Water Demand Management Strategy and Business Plan for Mokopane,' which was developed by appointed consultants in 2022.
4.2.2.1.	The operating company shall gather baseline or background data to reliably determine: a. The seasonal and temporal variability in: i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project; ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwater) that may be affected by the mining project; and b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project.	●	As part of the environmental management program (2019) environmental authorization process, a surface water specialist study was commissioned to assess the potential impacts on surface water. Currently, Mogalakwena is not releasing any water into the environment. A water quality monitoring program has been developed that includes both surface and groundwater monitoring localities. Surface monitoring is conducted monthly. Groundwater monitoring is conducted quarterly. When requested by stakeholders, water samples are taken in the surrounding communities to determine the water quality. The mine developed a detailed water balance in accordance with the ICMM water counting framework. Routine monitoring of surface and groundwater flows takes place on a regular basis. Borehole abstraction is tracked by individual flowmeters. There are multiple monitoring wells around the mine area, to measure and check for changes in sub surface water levels, and predict sub-surface flow directions. Water quality is monitored monthly for surface waters and quarterly for ground water, at locations selected according to various inputs, including community concerns. All monitoring points are trended (where data exists) to determine whether contaminant levels are changing and in which direction. Where relevant, the mine monitors both upstream and downstream water quality in order to try and identify background levels and determine the source of contaminants – whether on-site or off-site.

4.2.2.2.	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: 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.		The Final Scoping Report for Integrated Environmental Authorization / Waste Management License Process, Consolidation & Amendment, 2020 was reviewed as evidence. The report includes a commissioned specialist study. Although the scoping report was shared with stakeholders, no evidence was found of collaboration with relevant stakeholders.
4.2.2.3.	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: 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		A conceptual site model and numerical model were developed by SRK in 2019 for surface water, and by Itasca in 2019 for groundwater. A water balance model was developed using GoldSim for the Mogalakwena Complex Expansions Options Study (MCEOS) Pre-Feasibility B. No reference is made to whether water treatment will be required beyond domestic effluent requirements, other than the recommendation of the 2019 Jones & Wagner report that further studies should be conducted to assess whether treatment of the Buffer Dam water would be required or different blending" "strategies for the pit and treated sewerage effluent water investigated."

	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.		
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.		Although the mine reported that GoldSim was used for water balance and Floodlines were modelled using HEC-RAS;HYDRUS, MINEDW and MODFLOW were used for groundwater modelling by Itasca in 2019. No documentation was submitted to verify that the tools and models used are consistent with industry best practices.
4.2.3.1.	The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.		Although the environmental management program (2019) authorization addresses the surface and groundwater impacts, no evidence was submitted to show consultation with relevant stakeholders regarding the mitigation strategies. Furthermore, no evidence to show that the mitigation hierarchy was taken into consideration when mitigation measures were considered. Since the onsite audit, the mine has reported that the aspect of this requirement regarding future water use is being addressed through regular engagements with the regional water authorities and other relevant stakeholders. Further evidence supporting this

			claim will be requested and reviewed by the audit team during the next surveillance audit.
4.2.3.2.	If a surface water or groundwater mixing zone is proposed as a mitigation strategy: 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: 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	—	The mine reports that no mixing zones have been identified.

	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 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.	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: 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).	—	Currently, Mogalakwena is not releasing any water into the environment.
4.2.3.4.	Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable	◔	Mogalakwena reports on water usage monthly. The mine has a negative water balance. In order to correct the negative balance, the mine has an agreement with the Mokopane municipality to

	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).		receive sewerage water. No evidence was submitted to show collaboration with stakeholders.
4.2.4.1.	**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: a. Establish a sufficient number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics); b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics; c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics; d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;	●	The mine has implemented various measures to ensure compliance with this requirement. a. The Surface water specialist study conducted by SRK consulting in September 2019 was submitted as evidence. As part of this surface water specialist study, the existing monitoring points were assessed. This assessment included the evaluation of the impact of mining operations on the surrounding rivers Witrivier (Thwathwe), Mohlosane (Klein Sandsloot) River and Groot Sandsloot (Pholotsi) River. The assessment found the existing monitoring points to be adequate. Mogalakwena Mine samples, analyses, and evaluates the physical, chemical and bacteriological quality of surface and groundwater. A monthly water balance reflecting the quantities of water used, and a monthly report showing the quality of sampled water is compiled. b. Surface water is analyzed monthly and groundwater quarterly. During flood events sampling is conducted and analyzed. c. A trigger action response plan (TARP) has been developed in conjunction with the emergency response plan to enable the mine to report and monitor changes in water characteristics. d. No water is discharged from the mine for re-use by non-mining entities. All process and storage water are utilized in the mining process. It forms a closed loop with water being pumped from the storage pits to the storage dams, where it is then pumped to processing plants and back to the storage dams to be utilized again. e./f. Monthly surface water samples are taken by an appointed specialist company, Aquatico Scientific. Groundwater samples are taken and analyzed quarterly. Aquatico Scientific conducts the

	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.		analysis, and is an SANAS (South African National Accreditation System) accredited laboratory.
4.2.4.2.	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.		Section 9 of the water management plan for Mogalakwena dated December 2022 addresses the measurement of water quality and quantity monthly. The parameters measured are in the Water Use License. It was not clear at the time of the audit that a comparison was made with the IRMA water tables. Since the onsite audit, the mine has reported that they had compared the parameters they monitor against the IRMA water tables. Further evidence supporting this claim will be requested and reviewed by the audit team during the next surveillance audit.
4.2.4.3.	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: a. Participation may involve the use of independent experts selected by the community; and		Monitoring programs have been developed and implemented; however, no evidence was found of the active involvement of stakeholders of affected communities.

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.

4.2.4.4. **Critical** The operating company shall develop and implement an adaptive management plan for water that:

a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and

b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.

The mine submitted the Operational Plan, Mogalakwena complex, Water Quality & Quantity Operating Procedures & Adaptive Management Plan (AMP), dated 4 September 2024, for review.

a. Sections 1-7 of the plan describe the current ground and surface water conditions at Mogalakwena, as well as the key risks and monitoring program. Mitigation against current impacts on surface water and ground water quality is addressed through monitoring programs. Water is sampled and analyzed at intervals as per the program. In 7.3 the groundwater abstraction and storage are discussed in a short paragraph. No water balance was included or referenced in the AMP, but the mine maintains a comprehensive water balance, separately. There is no process described in the AMP to identify and include future uses, such as those related to underground development of the mine, for example. These are addressed in project-specific plans. Section 9 of the AMP states that the current plan is a pilot version for implementation and will be updated following a 12-month pilot phase. However, the update criteria are focused on identifying new or revised trigger levels and do not include anticipated or potential future changes in surface water and groundwater quality and quantity related to the mining project

			b. Section 8 of the AMP describes the trigger response and adaptive management action plan. Section 8.1 : Trigger response action plan for water quality and Table 8.2 : Trigger response plan for water quantity. It is not clear in table 8.1 and 8.2 how the mine plans to address 'adaptive water management'. Furthermore, it is not only the Trigger action plan that addresses adaptive water management. The predicted impact and changes that the mining activities will have on the quality and quantity of water for future uses (including post closure) is not addressed as per the requirement. Mine personnel stated that the significant remaining life of the mine meant that consideration of post-closure was not relevant at this time, but did not provide a technical analysis to support this position. No water balance was referenced in the AMP, but the mine maintains a comprehensive water balance, separately. There is no process described in the AMP to include future uses, such as those related to underground development of the mine, for example. These are addressed in project-specific plans. Section 9 of the AMP states that the current plan is a pilot version for implementation and will be updated following a 12-month pilot phase. However, the update criteria are focused on identifying new or revised trigger levels and include anticipated or potential future changes in surface water and groundwater quality and quantity related to the mining project. Mine personnel stated that the significant remaining life of the mine meant that consideration of post-closure was not relevant at this time, but did not provide a technical analysis to support this position.
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		Mogalakwena currently has not implemented an adaptive water management plan.

	and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes.		
4.2.4.6.	Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans.	⊗	Mogalakwena currently has not implemented an adaptive water management plan.
4.2.5.1.	The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities: a. Monitoring data for surface water and groundwater points of compliance; and b. Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations.	⊗	The mine did not submit information/documentation that show the publishing of water quality data in the public domain. No requests from stakeholders regarding water quality results were reviewed.
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 quality that pose an imminent threat	⊗	The mine has developed a trigger action response plan in conjunction with the emergency response plan (ERP). The trigger action response plan currently does not clearly indicate how the mine will interact with communities and stakeholders in the event of changes in water quantity or quality that pose an imminent

	to human health or safety, or commercial or natural resources.		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.	⊗	No records were submitted by the mine to show that discussions are taking place between the mine and stakeholders regarding water management strategies and performance results.
Chapter 4.3—Air Quality			Basis for rating
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.	●	As part of the scoping process for every activity in the operation, an air quality impact assessment is one of the specialist studies required to inform the environmental authorization process. The air quality impact assessment report provides a baseline description of the air quality and meteorological conditions for the study area and assesses the potential impacts that the proposed project may have on air quality. The operation has identified its air quality potential impacts as part of the 1996 environmental management program (refer to pg 98). The operation also identified its air quality potential impacts as part of the 2019 environmental management program. Pre-construction impacts (pg 208, table 18-3), construction impacts (pg. 222, table 18-5), operational impacts (pg. 237, table 18-7) including closure/rehabilitation phase impacts (pg. 250, table 18-9) have been identified. Review of summary of identified impacts and the air quality impact assessment for the mine expansion project demonstrated

			consideration of impacts from this activity. The 1996 environmental management program shows pre-construction consideration. The expansion project study (2019) gives an overall view of operations, consolidating many previous studies. Mogalakwena added monitoring, above the minimum required, and is monitoring dust, blasting gasses, etc. in local communities. Five "polludrones" and 36 dust fallout buckets are located in communities. The mine works closely with communities to locate monitors, with the intent to involve communities in "participatory monitoring," with village representatives accompanying environmental staff during monitoring.
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.		An air quality study was conducted as part of the first environmental management program approved in 1997 by the former Department of Minerals and Energy, now the Department of Mineral Resources and Energy. An initial baseline was determined in 1996. Upon consolidation of the environmental management program in 2019, another baseline was established. As part of the study, dispersion modeling was completed. Monitoring locations were selected inside and outside the mine and at key locations adjacent to communities. The mine has been in operation since before the baseline was conducted. Baselines were determined by existing mine activity at the time, in anticipation of expansion. There did not seem to have been an attempt to model or otherwise estimate a pre-mine baseline.
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		The air quality impact assessment report provides a baseline description of the air quality and meteorological conditions for the study area and assesses the potential impacts that the proposed project may have on air quality. As part of the approved environmental management program, all potential air quality impacts have been identified and predicted. Pre-construction

	assessment to predict and evaluate the significance of the potential impacts.		impacts (pg 208, table 18-3), construction impacts (pg. 222, table 18-5), operational impacts (pg 237, table 18-7) including closure/rehabilitation phase impacts (pg. 251, table 18-9) have been identified. Additionally, mitigation measures have been included that may minimize or result in avoidance of the potential impacts. Review of an issue-based risk assessment was finalized between Stage 1 and Stage 2. The risk assessment was undertaken to identify and quantify risks to the surrounding communities relating to air emissions. The report states that sensitive receptors located near the mine will be affected by the proposed expansion project; however, the predicted increase in dust levels at these receptors will remain below the particulate matter PM10 and, PM2.5 dust fallout standards. However, the increase may lead to nuisance levels of dust at these sensitive receptors. Based on the impact ratings, management measures are required, especially during the dry season, to maintain the low levels of dust currently observed within the mine boundary. Review of impacts takes place annually. A risk matrix was used to calculate the risk of each emission source. Dispersion at Run of Mine and Waste Rock Stockpile was determined to be most significant due to proximity to sensitive receptors and difficulty implementing effective controls. New controls included slower dumping, rotational water sprays, slope management, and vegetation growth on top soil. The mapping of emissions in relation to receptors has been completed.
4.3.1.4.	The assessment shall include the use of air quality modeling and monitoring consistent with widely accepted and documented methodologies to estimate the concentrations, transport		This requirement is fully met because an air dispersion modelling was conducted in 2013, projecting until 2035. In 2023, a scope of work was developed to model the air dispersion at Mogalakwena Complex in consideration of new activities. Review of documents supports the requirement to apply widely accepted and documented methodologies, and the information is

	and dispersion of mining-related air contaminants.		used to estimate the concentrations, transport, and dispersion of mining-related air contaminants.
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 operation has developed and implemented an air quality management plan with the aim to avoid, minimize, mitigate and manage any adverse impacts arising from activities at Mogalakwena Complex related to potential airborne contaminants, principally fugitive dust. Review shows that several controls are detailed in the air quality management plan related to a range of activities. The air quality management plan considers current and additional planned mitigation measures. Implementation activities completed include dust suppression on roads, vegetation on tailings, reduced vehicle speeds and a control system to monitor speed. Deposition at Run of Mine and Waste Rock Stockpile were determined to be most significant due to proximity to sensitive receptors and difficulty implementing effective controls. New controls included slower dumping, rotational water sprays, slope management, and vegetation growth on top soil. All significant air impacts were related to dust. No vehicle emissions or other emissions were deemed significant enough to need control. The mine is currently trying to develop predictive monitoring. Observations and discussions during Stage 2 showed that, while substantial dust generation is observed in many areas of the mine, the community impacts are monitored appropriately and are within IRMA limits.
4.3.2.2.	Air quality management strategies and plans shall be implemented and		Review frequency for the air quality management plan is 12 months. View of the document management system (DMS) confirms this. Review may also take place as or when needed. Based on

	updated, as necessary, over the mine life.		discussions with mine personnel, changed legal requirements or project scope could be triggers for review.
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.	●	An air quality monitoring program has been developed for monthly monitoring of dust fallout via dust bucket sampling both on-site and off-site in the surrounding residential areas. The monitoring is conducted in alignment with the American Society for Testing and Materials (ASTM) standard D1739. Dust samples are submitted to an accredited laboratory for total suspended solids analysis, and results are evaluated against compliance to the national dust limits (GNR 827 of November 2013). The mine is responsible for overseeing monitoring and change-out of dust buckets, required reporting and investigation of exceedances. Monthly reporting is legally required, and there is a budget provision to ensure ongoing activity to meet the requirement. New polludrones are bought to replace those stolen/vandalized and add to the network. These are located in existing seismic cages. Monitoring is conducted by a contracted third-party.
4.3.3.2.	Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be	●	An air quality monitoring program has been developed where monthly monitoring of dust fallout via dust bucket sampling is conducted both on-site and off-site in the surrounding residential areas. The monitoring is conducted in alignment with the American Society for Testing and Materials (ASTM) standard D1739 A map showing monitoring locations shows a distribution of on-site and off-site locations. Environmental personnel said that the locations were selected to ensure coverage for communities surrounding the mine, and not strictly based on ambient wind direction. Polludrones, providing real-time data, are mostly located in existing seismic cages to protect them from theft/vandalism, but these are

	informed by the air quality modeling results.		appropriately distributed throughout adjacent communities. Monitoring is conducted by a contracted third party. A third-party study was commissioned and conducted in August 2021 to understand the constituents of typical mine dust to determine whether there was any health concern for nearby residents. It also provided some insight into sources of dust, indicating that a good portion of measured dust originates from ambient non-mining sources. Discussions and observations during Stage 2 showed that the mine had sufficiently localized monitoring to support investigations into dust-related community complaints.
4.3.4.1.	New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows: 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	—	The organization complies to The National Environment Management: Air Quality Act (NEM: AQA), No. 39 of 2004 that governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. All exceedances are investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3-1). The relevant authorities should be informed if the permitted fallout rates and frequencies are exceeded. The monitoring is conducted in alignment with the American Society for Testing and Materials (ASTM) standard D1739. The site is currently complying with South African and ASTM standards but has not yet reviewed the EU standard and compared performance. The site is not aware of the details of EU regulations, so it has no idea if they are complying with them. Rating would be "Does not meet," but is not being scored at this time.

	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.		
4.3.4.2.	As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows: 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 related to its air emissions, then more stringent international best practice standards shall apply; 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 d. For all air-emissions-related risks, the mine shall demonstrate that it is	—	The site complies with local regulation and the American Society for Testing and Materials (ASTM) standard standards but has not taken a risk-based approach to determining what air quality standards are applied. Based on available evidence, the mine meets requirement a. only. The rating would be "Does not meet," but it is not being scored at this time.

	making incremental reductions in emissions, through a multi-year phased plan with defined timelines.		
4.3.4.3.	Dust deposition from mining-related activities shall not exceed 350 mg/m2/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.	—	The National Environment Management: Air Quality Act, No. 39 of 2004 (NEM: AQA) governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. All exceedances are investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3-1). Regulatory limits noted in referenced table are: 30-day average: - Residential D < 600; - Non-residential < 1200. Available data shows that most dust deposition is within the 350 mg/m2/day, but based on a limited sample of data, some are as high as 438 mg/m2/day in residential areas and 698 mg/m2/day in non-residential areas. However, it is possible that a seasonal average would be below 350 mg/m2/day. The data has not been processed to determine that. The environmental team notes that local agricultural activities and non-mine roads can contribute significantly to measured dust. Therefore, assigning exceedances to mine activities, or attempting to further reduce typical loadings, may not be accomplished through improvements the mine can control. Additional data was reviewed during Stage 2, confirming the above.
4.3.5.1.	The operating company shall ensure that its air quality management plan and compliance information is up-to-	●	American Platinum's primary sustainability goals are to be a trusted corporate leader by striving for the highest standards of governance to drive transparency and improve accountability with their

date and publicly available, or made available to stakeholders upon request.		stakeholders. All environmental management program reports are made available on the Anglo American website. The safety, health, and environment policy states that all environmental-related documents are available to stakeholders upon request. Air quality monitoring information can be requested via the social performance department through their grievance management process. All environmental management program reports are made available on the Anglo American website. An annual high-level summary of air monitoring is included in the annual sustainability report. Monthly and more detailed monitoring would be made available to any stakeholders upon request. This is voluntary. Reports to regulators are not automatically public. Recent regulation requires that annual environmental reports be made publicly available.

Chapter 4.4—Noise and Vibration			Basis for rating
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 is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels.	●	Every time there is a new or modified activity, the noise screening and related environmental management plans are updated. An issue-based risk assessment has identified sources and receptors of noise and vibration. A noise modeling report from March 2022 states that it was conducted in line with IRMA requirements, including identification of significant sources and receptors.
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.	—	Noise impacts were identified as part of the 1996 environmental management program. The mine was already operating at this time, but much smaller than present. A contractor (SLR) is employed to conduct continuous noise monitoring in surrounding communities and is applicable to all activities. Additionally, there is a separate consultant (Blast Management Consulting), monitoring noise and vibration specific to blasting. Supplied evidence and rationale did not demonstrate that there has been any measurement or modeling to try and determine baseline ambient noise levels.
4.4.2.1.	If screening or other credible information indicates that there are residential, institutional or educational	●	The monitoring contractor identified some examples of noise exceedance. For example, in Q2 2022 they stated that the only time and location where the noise emission limits have been exceeded

	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.		are at noise sensitive receiver NSR19 during the night-time, due to intermittent dump truck movements, rock offloading from a conveyor from around the Blinkwater Tailing Storage Facility and Vaalkop Tailing Storage Facility area and constant noise from the North Concentrator. The affected area has since been mostly relocated, and nobody is in the residence at night. The other location where nighttime noise exceeded the limits was at the Seritarita School, in Skimming, which is not occupied at night and will be relocated.
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.	—	Baseline ambient noise levels may not have been determined exactly, but as the only noise exceedances in supplied data were a maximum of +5dBA only at night in locations not occupied at night, ambient levels are below the specified limits.
4.4.2.3.	If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary or nearest industrial or	—	As part of the environmental management program (2019) specialist studies, an environmental noise assessment was conducted to determine the prevailing ambient noise levels in the vicinity of the proposed Mogalakwena Mine expansion project and at the residential areas along the boundaries of the mining right area.

	commercial receptor shall not exceed 70 dBA.		A noise monitoring program was implemented in 2022 where noise monitoring was conducted quarterly in 2022. The program aims to (1) establish Mogalakwena Complex's ambient baseline noise conditions where possible; and 2) demonstrate the Mogalakwena Complex's compliance with various South Africa regulatory requirements and national standards, as well as international standards, including International Finance Corporation (IFC) performance standards and Initiative for Responsible Mining Assurance (IRMA) standards. Monitoring localities range from households and schools in the community and include blasting schedules that were incorporated into the analysis.
4.4.2.4.	If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows: a. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period; b. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and c. Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time.	◔	a. The blasting plan states that overpressure cannot exceed 115 dB (linear peak) for nine out of 10 consecutive blasts initiated, and not greater than 120 dB (linear peak) at any time. This is not in line with IRMA requirements. Data showed 12 exceedances out of 410 blasts (0.03%) in 2023 up until 9 November 2023. One blast exceeded 120dB, not meeting the mine's internal requirement, but there is no relevant IRMA requirement. b. Local regulations allow blasting between 30 minutes after sunrise and 30 minutes before sunset. However, blasting at Mogalakwena only occurs between 09:00 and 17:00. The blasting plan states that blasting will only take place between sunrise and sunset. While this the mine's practice is compliant, the blasting plan does not meet IRMA or regulatory requirements. c. Blasting plan vibration limits are the same as IRMA requirements. The maximum measured vibration in 2023 through November 9 was 6mm/second. The 5mm/second limit was exceeded five times out of 410 blasts (0.01%), and none within nine consecutive blasts.
4.4.2.5.	Mines may undertake blasting outside of the time restraints in 4.4.2.4.b when	—	The mine's rationale references a requirement that blasting shall only take place between the hours of sunrise and sunset. Under no

	the operating company can demonstrate one or more of the following: a. There are no nearby human noise receptors that will be impacted by blasting noise or vibration; 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.		circumstances shall blasting take place during the hours of darkness. Should a need arise to blast or work with explosives during the hours of darkness, the EA Regulation 10.25 shall be strictly adhered to. Regulation 10.25 – except with the written permission from the inspector of explosives (IOE) and under conditions prescribed by him, blasting materials shall not be used during the hours of darkness from half an hour after sunset to half an hour before sunrise. While this procedure does not meet IRMA requirements, the reported practice of only blasting between 09:00 and 17:00 does meet requirements. IRMA allows this to be marked not relevant if the company meets requirement 4.4.2.4.b
4.4.2.6.	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.	◔	The site has a grievance procedure/grievance register in place. Grievances are reported and then investigated with mitigatory actions implemented. Grievances are logged, and a relevant subject matter expert will be consulted if required (noise complaints go to the environmental team, blasting complaints to the blasting team). Stakeholder interviews with local community members identified problems with dust on the roads causing disturbances to and structural damage because of the vibration caused by blasting. The mine has also reported that complaints regarding structural damage from vibration were received. The mine's practice has been to send someone to repair cracks, usually regardless of the outcome of any investigation or assessment. Some complaints were reported from up to 5Km away, suggesting that blasting vibration sometimes could not be a cause. Several interviewed stakeholders noted that not all cases of structural damage were addressed by the mine, and the problem of dust has not been resolved.

4.4.2.7.	All noise- and vibration-related complaints and their outcomes shall be documented.		Noise, light, dust, and water pollution were highlighted as concerns from stakeholders. Most of the light and noise complaints were from Ga Molekana. Following a community meeting, the mine stopped night activities in the immediate area and has almost completed the work that was affecting the community. No follow-up meetings have taken place to verify that the community was satisfied.
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.		Noise, light dust and water pollution were highlighted as concerns from stakeholders. Most of the light and noise complaints were from Ga Molekana and concerned night operations on buttressing Vaalkop Tailing Storage Facility. During the community meeting regarding the issue, monitoring data was provided by the mine.

Chapter 4.5—Greenhouse Gas Emissions		Basis for rating
4.5.1.1.	**Critical** The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to: 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.	The policy sets out the principles that will inform Anglo American's approach to the challenge of climate change and the management of risks and opportunities associated with it. Key principles of the group climate change policy include: - Building internal agility and ensuring resilience to climate change - Driving energy and carbon savings throughout our business - Understanding and responding to the carbon life-cycle risks and opportunities of our products - Developing and implementing collaborative solutions with our stakeholders - Contributing our skills and knowledge to the development of responsible public policy The safety and sustainable development group standard on energy and greenhouse gas emissions management and the related energy and greenhouse gas emissions management guideline set out the requirements to help drive energy and carbon savings across the group. The Anglo American standard requires energy and greenhouse gas emissions consideration in: - Planning: projected energy use, intensity, and greenhouse gas emissions - Target setting: aligning site and business unit targets with group objectives - Design: new facilities, processes, and equipment with significant energy use - Procurement: part of the evaluation criteria for major equipment, products, and service sourcing

			- Measurement, monitoring and verification: measurement and controls for data consolidation and reporting. The Mine has been able to demonstrate that they are appropriately implementing the Climate Change Policy and the Energy and Greenhouse Gas Emissions standard through points a, b, c and d as per the requirement.
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.		The Group Global Reporting Initiative's (GRI) Standards Contents Index indicates that GRI 305, specifically GRI 305-1 through GRI 305-7, are identified as material within its sustainability reporting. On-site data is reviewed by Anglo American Group and Platinum technical experts who then use that data to quantify site-by-site operational emissions broken down into significant energy sources and uses.
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.		The energy and greenhouse gas emission management standard is a corporate document for consistency and reliability in greenhouse gas management and reporting. Anglo American has committed to becoming carbon neutral across their operations by 2040. Mechanisms are in place across the Mogalakwena Complex to reduce emissions (hydrogen truck, renewable energy initiatives etc.).
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.		The energy and greenhouse gas emission management standard is a corporate document for consistency and reliability in greenhouse gas management and reporting. Anglo American Platinum Group has a target of carbon neutrality by 2040. Selected mines globally are expected to be carbon neutral by a target date, but it is unclear if Mogalakwena will be one of those sites. Every operation must have projects and initiatives to reduce greenhouse gas emissions. Implementation of renewable energy initiatives is in progress.
4.5.3.3.	The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies,		An overall strategy to identify more efficient mining strategies is underway, including extraction methodology and supporting infrastructure, etc.

	and shall document the results of its investigations.		Identification of alternative emissions reduction initiatives is currently being investigated and when feasible, these initiatives are then implemented across the Mogalakwena operation.
4.5.4.1.	The greenhouse gas policy shall be publicly available.	●	The corporate group climate change policy, which applies to all Anglo American Platinum business units, group functions and controlled subsidiaries, is publicly available.
4.5.4.2.	On an annual basis, the operating company or its corporate owner shall: a. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards 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 "Anglo American Platinum Sustainability Report 2022" gives a consolidated account of greenhouse gas emissions and performance against corporate reduction targets (net zero by 2040) and initiatives. The information in the report does not show mine level data but does report on corporate level data and reduction measures.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas			Basis for rating
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.	●	All specialists involved in the Mogalakwena biodiversity studies and assessments have the required qualifications and competencies. Each of the specialists are registered in respect of the South African Council for Natural Scientific Professionals (SACNASP). SACNASP is the legislated regulatory body for natural science practitioners in South Africa. The natural sciences encompass a wide range of scientific fields covering all the basic sciences and many of their applied derivatives.
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.	●	Consultation with stakeholders takes place during the environmental impact assessment, which also includes reviews of the various specialist studies. Stakeholders can raise any concerns or provide comments on the content in the environmental impact assessment (EIA) and accompanying biodiversity specialist studies. Where concerns are raised by the community, engagement with community and other stakeholders takes place. The stakeholder engagement forum meets frequently (monthly, quarterly or as issues arise).
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.	●	Relevant environmental, health and safety information are made available to stakeholders upon request, and this commitment is outlined in the site's safety, health and environment (SHE) Policy. The annual sustainability report that is published also outlines Mogalakwena's commitment to biodiversity management. The consultant that facilitates the impact assessment and associated specialist studies also publishes an electronic copy of the draft and final reports on their website.

			No formal requests with respect to biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data have been put forward to the Mogalakwena mine.
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.	●	Flora and Fauna International were appointed in June 2021 to construct the Mogalakwena mine's biodiversity and Ecosystem services baseline following the review of the Biodiversity Action Plan/s also done by Flora and Fauna International in July 2020. In 2023, a proximity report was generated using the integrated Biodiversity Assessment Tool (iBAT). The report highlighted vulnerable, endangered and critically endangered species that may be found within 50Km of the existing Mogalakwena mine operations. No go areas have been identified (feasibility and pre-feasibility processes for the new Blinkwater #2 tailings expansion), which aims to protect the threatened biodiversity species in those areas.
4.6.2.2	Screening shall include identification and documentation of: 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	●	The biodiversity risk assessment includes identification of all the information required from a-d. Significant biodiversity features (SBF) include habitats that are highly threatened, unique or irreplaceable; support endangered, critically endangered, rare, endemic or geographically restricted species; support globally significant migratory species or congregatory events; support or represent priority ecosystem services (PES), important ecological functions or evolutionary processes; are core patches of habitat or bridge habitat that serve to connect wider landscapes or seascapes, are pristine, are protected or priority habitats under national legislation; are natural habitats. Species that are highly threatened species of endangered or critically endangered conservation status at global and national level, rare or uncommon, endemic and / or range-restricted, migratory and / or congregators are considered a conservation priority by experts and stakeholders.

	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.		
4.6.3.1.	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: a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence; 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;	●	Requirements as per a - d are demonstrated as follows: a. No protected areas intersect the extent of the Mogalakwena operation. Additionally, no RAMSAR wetlands of international significance intersect the Mogalakwena operation. b. With no protected areas intersecting the Mogalakwena operation footprint, no primary impacts have been identified. However, secondary impacts were identified, such as increased migration within the operation for employment that may result in expanded urbanization, cultivation and degradation of natural habitat. This could be a result of employment within the operation, or migrants seeking employment from the operation or other businesses. Subsequently, this could increase pressures on protected areas from encroaching land use changes. c. As part of the proposal for the finalization of the biodiversity management program, one of the outcomes includes the following: for each affected significant biodiversity features (SBF, the objective that will deliver additional, measurable and durable net positive impact (NPI) outcomes will be defined, and details provided as to the size of offset to deliver net gains. Residual losses will be addressed with actions that are proportionate to both the size of the residual impact and the current level of biodiversity. d. As part of the proposal for the finalization of the biodiversity management program, the outcome will include undertaking

	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 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.		stakeholder engagement sessions, which should also include mine management, Anglo American Group Technical and Sustainability, local beneficiaries, relevant governmental departments, partners and local experts to support and inform the final selection of additional conservation areas (ACA).
4.6.4.1	**Critical** Mitigation measures for new mines shall: a. Follow the mitigation hierarchy of: i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them; ii. Where impacts are not avoidable, minimizing impacts to the extent possible;	—	Mogalakwena is an existing mine and therefore this criterion is not relevant.

	iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and iv. As a last resort, offsetting the residual impacts. 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	At existing mines: 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		Offsets and biodiversity stewardship initiatives will be implemented in line with South Africa legislation and the Group Anglo American Biodiversity Standard. While no offsets have yet been implemented at the time of the Stage #2 on site assessment, a proposal was submitted by an external consultant to assist in the compilation/development of Mogalakwena's biodiversity offset management plan (BOMP). Due to the nature of the operations, the site is in the process of consolidating all existing biodiversity plans and programs into one consolidated biodiversity management and offset plan through the appointment of an external service provider/consultant. At the time of the Stage 2 assessment, no appointment was finalized.

	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.		
4.6.4.3	Offsetting, if required, shall be done in a manner that aligns with international best practice.		No offsets are currently implemented, but discussions are underway to consider offsets for future mine operations. Mogalakwena intends to quantify the residual impacts to the significant biodiversity framework (SBF) and priority ecosystem services (PES) after the application of the mitigation hierarchy, and ensure the baseline represents the biodiversity and environmental features and values that support and supply PES. This is to be achieved in collaboration with the social performance team.
4.6.4.4.	The operating company shall develop and implement a biodiversity management plan or equivalent that: a. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services;		Anglo American's (AA) biodiversity standard requires that all AA operations develop a biodiversity management plan (BMP) to achieve a net positive impact (NPI) for significant biodiversity features (SBF) and priority ecosystem services (PES) impacted since January 2018. NPI is a position that is achieved where the impacts on biodiversity caused by a project/operation are outweighed by measures taken to first avoid and minimize impacts, then to undertake actions to recover or offset those losses. The existing biodiversity management plans are outdated and fragmented. The mine is in the process of consolidating all historical management plans and assessments into one management plan for easy implementation.

	b. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time; c. Provides a budget and financing plan to ensure that funding is available for effective mitigation.		A high-level environmental budget for the management of biodiversity-related actions was proposed at R5million (ZAR). This includes the execution / excavation diversions and wetland interventions associated with the Mogalakwena Northern wetland diversion and Blinkwater wetland remediation. A strategy in place to obtain NPI for Anglo American Platinum and the development of a comprehensive biodiversity baseline is a prerequisite to meaningful progress towards the achievement of NPI. Anglo American, as a taskforce member of the Taskforce for Nature-related Financial Disclosures (TNFD), is well positioned to handle this increase focus and has already had positive engagements with several investors about our approach to nature. The Mine's current goal is focused on NPI. The goal is to drive gains that exceed the losses over a defined period. The 'net' in NPI acknowledges that some biodiversity losses are unavoidable, and that gains may not be perfectly balanced regarding time, space, or type of biodiversity affected. The NPI commitment in the sustainable mining plan was made in 2018 to deliver NPI on biodiversity across Anglo American and to set a 2030 stretch goal.
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.		Mogalakwena is in the process of consolidating all biodiversity management plans and programs into one document, as per frequencies determined by the mine and reviews of existing biodiversity monitoring that is undertaken. The intent behind the consolidation is to ensure periodic reviews are undertaken and updates to various management plans are made. It is understood that elements of these plans/programs are reviewed at least every 3 years by an independent, reputable conservation organization, institution, or relevant certification body.
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		There is no new exploration or development of new mines in any legally protected area.

	remainder of this chapter are met, and additionally the company: 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.		
4.6.5.2	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. • International Union for Conservation of Nature (IUCN) protected area management category IV protected areas; • Ramsar sites that are not IUCN	—	The mine is not located within any protected area.

	protected area management categories I-III; and • Buffer zones of UNESCO biosphere reserves.		
4.6.5.3.	**Critical** IRMA will not certify new mines that are developed in or that adversely affect the following protected areas: • World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; • IUCN protected area management categories I-III; • Core areas of UNESCO biosphere reserves.	—	This requirement is not relevant as the mine is not a new mine.
4.6.5.4.	**Critical** An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that: 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 special values for which the area was designated or recognized; and c. The operating company collaborates with relevant management authorities to integrate the mine's	—	The mine is not located within any protected area.

	management strategies into the protected area's management plan.		
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.		Consultants are appointed to develop and implement the biodiversity and rehabilitation monitoring plans. An externally appointed consultant is in the process of consolidating all biodiversity management plans and programs into one document.
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.		Biomonitoring takes place during winter and summer and thereafter a biomonitoring report is produced. The findings/outcome from the biomonitoring report is then considered when updating information on baseline biodiversity conditions and this information further provides updates on management plans . Anglo American aims to make use of a consistent metrics and methodology to compare the pathways and net positive impact (NPI) trajectories of the respective businesses and sites. In doing so, the respective corporate and site teams started to quantify actions to avoid, reduce and restore habitat, and identify opportunities to deliver positive biodiversity outcomes and assess timing and cost to implement.
4.6.6.3	If monitoring reveals that the operating company's protected areas and/or biodiversity and ecosystem services objectives are not being achieved as expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders.		Monitoring did not indicate that biodiversity and ecosystem services objectives are not being achieved, therefore this requirement is not relevant. The Mogalakwena biodiversity action plan highlights the need to consult the relevant stakeholders in the development of corrective actions.

4.6.6.4	The findings of monitoring programs shall be subject to independent review.		Monitoring is undertaken by independent consultants appointed by the mine. Monitoring programs are not subject to independent review.

Chapter 4.7—Cyanide Management		Basis for rating
Chapter Not Relevant	—	Cyanide is not used, stored, produced, or transported at the mine.

Chapter 4.8—Mercury Management		Basis for rating
Chapter Not Relevant	—	Mercury is not used, stored, produced, or transported at the mine.

Appendix B – Corrective Action Plans

Finding Number	**3452.IRMA.01/01**
Requirement	1.1.1.1. The operating company shall comply with all applicable host country laws in relation to the mining project.
Critical	Yes
Rating	Substantially Meets
Justification	Anglo American Platinum Mogalakwena Mine strives to comply to host country laws. Compliance to South African legislation is demonstrated by undertaking safety, health, and environmental external and internal legal compliance audits. Where non- compliance to host country laws is identified, actions are generated and those are tracked through the Isometrix system, which is an environmental health and safety management system for the management and tracking of environmental, health and safety compliance-related actions, including actions generated from internal and external audits and visits by the regulator. The mine has appointed a service provider (as part of the legal register subscription) to provide an overview of applicable legislation with which the mine is required to comply. The last environmental health and safety compliance audit was undertaken in February 2023. An external audit was undertaken by Anderson Attorney's in June 2022. The purpose of the Baseline Permitting Review and Compliance Audit in respect of third-party contractors is to ensure that each of the operations' third-party contractors are in possession of the permits, licenses and/or exemptions that are legally required for the services that they provide to the respective operations and that the third-party contractors comply with the conditions provided for in the permits, licenses and/or exemptions.

The only external compliance assessment was undertaken by Libryo in February 2023 which covered environment, health, and safety legal compliance across the Mogalakwena operation. The findings raised in the compliance reports are assigned and actioned through Isometrix.
In December 2022, the mine was issued a non-compliance notice from the regulator whereby an action plan was developed, and the assigned personnel are managing their respective actions with regular engagement and progress reports to the regulator.
During the on-site assessment, non-compliant hazardous waste management practices were observed in the salvage yard and the Potgietersrus Open Cast Section area. These included (not limited to), inadequate separation of hazardous and general waste streams, open hazardous waste drums, hydrocarbon contamination on bare ground, and full to near overflowing waste skips.
Since the Stage 2 on site assessment, the site has implemented several actions to address the concerns noted at Stage 2 and assist in the management of waste across the various collection points as well as across the Salvage Yard. Some actions verified on site include (but not limited to):
- Improved segregation of the different waste streams generated on site.
- Purchasing of additional general waste collection skips
- Timeous collection of waste streams to prevent waste skips from overflowing
- Additional concrete base has been established which will assist in the management and prevention of contamination
- Lidded skips have been procured to ensure that hazardous waste is kept covered and prevents rainwater ingress.
- added concrete pads under many waste skips, upgraded skips (leaks corrected), added covers, etc.
Management of general and hazardous waste requires on-going actions, and site has implemented processes to ensure continuity and sustained improvement in the management of the waste storage and collection points.
The site has future plans for upgrades which include additional impervious pads, drainage channels and sumps. These plans will be implemented once the required Capital Expenditure is applied for and approved.

Corrective Action(s)

Mogalakwena primarily monitors compliance to host country laws and its permit commitments using Isometrix. The site will continue to maintain its permit compliance monitoring cadence, including the conduction of root cause analysis on repeat observations whilst escalating concern points through site leadership where significant or legacy issues exist.

	The site will continue with its upgrades at the salvage yard (include additional impervious pads, drainage channels and sumps) once the required Capital Expenditure is applied for and approved.
Finding Number	**3452.IRMA.01/02**
Requirement	1.2.2.2. The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account.
Critical	Yes
Rating	Substantially Meets
Justification	The operating company makes continuous efforts to ensure two-way dialogue meaningful engagement with stakeholders. These efforts are supported by the stakeholder engagement plan development and implementation, stakeholder analysis, a feedback mechanism being available and promoted, community engagement through the community engagement forum and regular meetings with various groups of stakeholders. Relevant information is provided to stakeholders in a timely manner. The company regularly provides information to stakeholders, and there are monthly meetings with each of 52 potentially affected villages (although not all groups of stakeholders may be involved in these meetings). Also, there are separate meetings with vulnerable groups, relocated stakeholders, and stakeholders affected by grave relocation. There were

concerns identified regarding timely responses to grievances and timely sharing of information to stakeholders.
There is participation by site management and subject-matter experts when addressing concerns of significance to stakeholders. A grievance mechanism procedure includes involvement of relevant subject matter experts. The grievance review involves several potential reviews depending on the topic. There were concerns identified among stakeholders regarding company representatives responsible for various topics (e.g., resettlement and information sharing). Therefore, not all stakeholders can confirm that subject matter experts are involved when required.
Engaging in a manner that is respectful and free from manipulation, interference, coercion, or intimidation is confirmed through meeting notes of the community engagement forum, and meeting notes with stakeholders.
Soliciting feedback from stakeholders on issues relevant to them is done through a grievance mechanism and community meetings. Satisfaction surveys are in place. It was shared during interviews that some stakeholders were not aware of the various channels of submitting grievances. Some stakeholders have shared that they did not receive any feedback on the grievances that they have submitted. Community members also expressed some concerns that not all groups were adequately represented in future project planning discussions.
To provide stakeholders with feedback on how the company has taken their input into account, the mine has monthly meetings with stakeholders, where the company provides an overview of actions taken based on the stakeholder's feedback/grievances received.
Feedback is provided through the grievance mechanism procedure. At the same time concerns were raised among interviewed stakeholders regarding not receiving feedback from the mine on the issues of concern for them.

Corrective Action(s)

Mogalakwena will continue to work on fostering two-way dialogue with stakeholders through the continued implementation of the local accountability strategy enhancing effective engagement between the operation and its surrounding and host communities. Inclusive within this strategy the site will conduct a root-cause evaluation to better understand the concerns raised by the stakeholders.

Finding Number	3452.IRMA.01/03
Requirement	1.3.2.1. The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.
Critical	Yes
Rating	Substantially Meets
Justification	The mine contracted external assessors to aid in a Human Rights Due Diligence (HRDD) assessment. At the time of the follow-up IRMA assessment in October 2024, this was mostly complete. The mine stated their intent to better-integrate human rights concerns into other processes, as well as ensuring ongoing monitoring. Additionally, the mine has a risk and impact assessment process that includes the "Baseline Workplace Risk Assessment and Control (WRAC) and Risk assessment" and the "3C Social and human rights impact and risk analysis" (SHIRA) assessment. The baseline WRAC is the main depository of all risks and impacts. The SHIRA assessment considers several other assessments (environmental impact assessment, grievance mechanism, social induced migration study, conflict study). The SHIRA is developed for all operations, and specifically for some projects/activities. The SHIRA includes risks and impacts related to supply chain, procurement, and contactors. Based on the identified risks and impacts, existing management measures are listed, and new management measures are proposed.

	According to Anglo American requirements, the SHIRA is updated annually or when there are any changes in the operations. The evidence was provided that Mogalakwena site SHIRA was updated annually.
Corrective Action(s)	Mogalakwena mine has commissioned and completed a Human Rights Due Diligence (HRDD) study. As the HRDD was completed post the optional Corrective Action Period the site will continue its focus on the implemention, monitoring and evaluation of the recommendations.
Finding Number	3452.IRMA.01/04
Requirement	1.3.3.3. Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall: i. Cease or change the activity responsible for the impact; and ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders; b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact; c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.
Critical	Yes

Rating	Substantially Meets
Justification	The Social and human rights impact and risk analysis/Workplace risk analysis and control (SHIRA/WRAC) lists both potential and actual risks/impacts, including human rights impacts/risks. It is not always clear what risks/impacts are potential and what are actual. In addition to the WRAC/SHIRA process, the mine contracted external assessors to aid in a Human Rights Due Diligence (HRDD) assessment. a. Based on understanding of the mine operations and interviews with stakeholders, several risks/impacts listed in the SHIRA/WRAC documents, where the mine caused the human rights impacts, are actual (mainly risks/impacts related to resettlement) i. In the case of resettlement, the mine has changed its approach to the resettlement process to avoid potential human rights impacts and has initiated a completion audit of the resettlement process to identify impacts (including human rights impacts) that were associated with the past resettlement. ii. In the case of past resettlement human rights impacts, the mine has initiated a completion audit. The purpose of the audit was to identify mitigation strategies and remediation for the potential human rights impacts related to resettlement. Stakeholders were involved in the discussion of potential mitigation strategies through this audit. Based on the outcomes of the audit, an action plan is being developed. The action plan was not available for a review. In addition to the completion audit, HRDD outlines actions to address identified human rights impacts. However, HRDD was not completed in October 2024 and was not available for review. It is unclear what mitigation measures will be included in both the completion audit and HRDD, and whether they will address the identified impacts. b. Some identified risks/impacts on human rights may not be the direct outcome of the mine operations. Some human rights related risks/impacts where mine can contribute to an actual human rights impact are captured through the SHIRA/WRAC process. In these cases, SHIRA/WRAC action plans include relevant measures aimed at engaging other involved parties and to use mine's leverage to influence other contributing parties to cease or change their activities. E.g. for the grave relocation process that may lead to community infights and separation in traditional authorities, mine has developed a list of mitigation measures including engagement with traditional authorities per different topics. HRDD outlines actions to address identified human rights impacts. However, HRDD was not completed in October 2024 and was not available for review. It is unclear what mitigation measures will be included in HRDD, and whether they will address the identified impacts.

	c. Risks/impacts related to business partners of the mine are not assessed through the SHIRA/WRAC process. There are mechanisms in place to mitigate potential social impacts, including human right impacts, caused by business partners of the mine (e.g., social requirements to contractors). d. There were no cases identified when the mine caused, contributed to, or was directly linked to human rights violations through its business relationships.
Corrective Action(s)	Mogalakwena mine has commissioned and completed a Human Rights Due Diligence (HRDD) study. As the HRDD was completed post the optional Corrective Action Period the site will continue its focus on the implemention, monitoring and evaluation of the recommendations. For the element specific observations made (grave relocations and old resettlements) the site will continue to implement its developed actions.
Finding Number	**3452.IRMA.01/05**
Requirement	1.4.1.1. The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.
Critical	Yes
Rating	Substantially Meets
Justification	During external interviews, limited utilization of available grievance mechanisms for some groups of stakeholders was observed. There are more than 172,000 stakeholders located in areas of potential impact from the Mine. However, only 64 grievances were received from community members at the time of the IRMA Stage 2 audit in November 2023. Comments received in writing prior to and during the follow-up assessment

in October 2024 also highlighted that some community members felt concerns related to planned future mine expansion had not been addressed adequately. A preferred approach of working through village traditional authority leaders had also proven ineffective in some cases.
Although there are several mechanisms for grievance submission in place and based on onsite management interviews these mechanisms have been communicated to stakeholders, not all stakeholders are aware of the grievance mechanism process or have received feedback through this process when it has been used. In many cases, stakeholders have reported that they do not know how to submit grievances. Many stakeholders reported only being aware of the possibility of submitting grievances through a liaison officer. Other means are not well understood. Some stakeholders are also not able to submit grievances via the Internet as widespread or consistent access to the Internet is not available.
In an effort to begin to address the concerns raised by community members during Stage 2, in 2024 Mogalakwena conducted a baseline survey to further verify audit findings. A paper survey was distributed to approximately 14,000 households in 52 villages. The survey confirmed that a majority of stakeholders, some of which were members of vulnerable groups, were unaware of grievance procedures available. Of the groups and respondents that were aware many chose not to use the mechanisms available, preferring instead to approach traditional authority leadership with an issue or concern. Subsequent to this survey the mine has installed 50 noticeboards, promoted its grievance process through a series of radio broadcasts and formalized its engagement with traditional authority leadership. The mine also opened a toll-free phone number for community members to raise issues and concerns, advertising the number in radio broadcasts and distribution of the number of key fobs. The mine plans to undertake annual surveys in order to evaluate the effectiveness of its external grievance mechanism.

Corrective Action(s)

The site acknowledges the descrepancies that may remain post the extensive efforts implemented during the optional Corrective Actions period. A such the site will conduct a context review to understand (1) the extent of awareness of the Grievance Mechanism, (2) percieved effectiveness of the mechanism and (3) percieved trust in the mechanism. The site will undertake an evaluation exercise in 2025 on the effectiveness of the grievance mechanism.

Finding Number	**3452.IRMA.01/06**
Requirement	1.5.5.1. The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.
Critical	Yes
Rating	Substantially Meets
Justification	Anti bribery and corruption policies are in place and well documented. These are communicated to employees and to contractors during the contractor onboarding process. The policies are posted publicly via the Anglo American website. Allegations and complaints with respect to bribery and corruption are reported through the YourVoice platform, which also allows for anonymous reporting. Allegations and complaints are investigated, and depending on the nature of the corrupt activity, these are managed through the Anglo American Platinum group to ensure transparency and avoid bias or perception of "special treatment" shown to alleged guilty parties. Statements made during Stage 2 on-site assessment interviews with workers allege instances of corrupt activities by mine management were not adequately investigated and appropriate corrective actions taken.
Corrective Action(s)	Mogalakwena (and AAP) has developed, documented and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors (incl. YourVoice) and will continue to implement these policies and procedures, and improve on in collaboration with employees and contractors.

Finding Number	**3452.IRMA.02/01**
Requirement	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
Critical	Yes
Rating	Substantially Meets
Justification	The site used a standard template for the emergency management plan, which was developed according to industry standards and has been mapped against IRMA requirements. During internal review, an additional alignment check was performed. Plans were reviewed against the relevant requirements but not documented on a 1:1 basis. Inundation maps were recently updated. Currently, they have a generic emergency response plan that addresses all top 5 community emergency scenarios (dam failure, road accident, fires, hazmat spill, flooding), plus atmospheric releases, blasting and other incidents. There are other specific community response plans for issues unique to specific communities, such as community-specific tailing storage facility inundation. Following Stage 1, improved mapping of the current plan to United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (UN APELL) was completed and documented. The site created a checklist for the UN APELL requirements and conducted an evaluation of the emergency preparedness plan (ERP). Auditors identified that the ERP did not sufficiently cover requirements for potential community emergencies to be identified and incorporated. Subsequent actions included: - Consultation with communities to identify the hazards of most significance to them. The top items identified were tailings failure, floods/heavy rains, lack of trained first aiders in the communities, and fire. - Development of a multistakeholder community emergency preparedness drill evacuation plan. - External endorsement and participation in drills from 15 traditional leaders of affected villages (most affected in potential inundation zone.) - Monthly engagements in affected communities through posters, pamphlets, community meetings, etc.

	- The mine recruited 75 community Emergency Management Personnel (EMP)s (mostly youths) and put them through external accredited disaster management training, including basic firefighting and first aid. A WhatsApp group and other forums were established for EMP's to collaborate. - Tailings facility visits were conducted for community leaders and EMPs to enhance their understanding of tailings storage facility (TSF) operation, risks and the controls in place. - Vulnerable groups and related needs were identified, including some elderly, farmers and cattle who may require evacuation assistance, if applicable. - Involved community leaders, community EMP's and external support to develop evacuation routes, evacuation points, and other relevant parts of emergency response plans. They also involved schools, local police, taxi association, provincial and district disaster management departments. Auditors noted that emergency communication plans all required several steps before communities would be alerted. The related scenarios were all predicated on the assumption that there would be warning signs, such as leaks or bulges, prior to a tailings storage facility or dam failure. While this may be the most credible and likely scenario, there was no fast-response path identified for a sudden tailing storage facility failure. The mine has since installed extra sirens, covering the six most villages which would be first impacted by a TSF failure, and has plans to install more. The mine is using worst-case precipitation to model flooding (including impact on TSFs). Also, the technical team is considering potential changes due to climate change and updating models and associated predictions as applicable.
Corrective Action(s)	Mogalakwena mine will conduct and document the review of its Emergency Response Plan against the United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (UN APELL) guidelines documenting conformance on a 1:1 basis.
Finding Number	**3452.IRMA.02/02**
Requirement	2.5.2.1. The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.

Critical	Yes
Rating	Substantially Meets
Justification	The mine states that the emergency preparedness and response plan for emergencies, which can affect communities, is prepared together with community representatives. Workshops are held with the representatives who facilitate awareness in the communities. The site emergency response plan (ERP) and business continuity management plan (BCMP) are drafted with the standards committee, which includes employee representatives. All site documents are shared with everyone via an email platform, and documents are readily available in SharePoint. In interviews with mine personnel, it was stated that community stakeholders and the tribal council were also involved (representing villages in area of influence), and that contract subject matter experts were brought on board to ensure adequate involvement of local bodies. For mine internal emergency response planning development, employee representatives are involved. Final documents are made accessible through a SharePoint portal where any employee can gain access. Evidence shows that an ERP is developed and communicated to potentially affected communities and workers. Related personnel are invited to participate in emergency response planning and provide feedback on various lessons learned and related concerns, which contribute to proposed updates. During community stakeholder interviews, at the Stage 2 audit, people stated that they were not consulted in the development of emergency plans but only told what had already been proposed or decided. This suggests that the initial stakeholders engaged through ccommunity early warning committees (CEWCs) may not be the same as those involved in the audit process. In response to this and related concerns, the mine developed and implemented several actions to improve stakeholder consultation and participation. These included: - Consultation with communities to identify the hazards of most significance to them. The top items identified were tailings failure, floods/heavy rains, lack of trained first aiders in the communities, and fire. - Development of a multistakeholder community emergency preparedness drill evacuation plan. - External endorsement and participation in drills from 15 traditional leaders of affected villages (most affected in potential inundation zone, - the communities/areas located in risk areas (such as downstream of tailings storage facilities (TSFs)) most likely to be inundated/flooded as a result of catastrophic failure of the retaining dam as per a technical risk assessment. Evacuation would be required for these communities/areas in case of a

	tailings failure.) - Monthly engagements in affected communities through posters, pamphlets, community meetings, etc. - The mine recruited 75 community emergency management personnel (EMPs) (mostly volunteer youths) and put them through external accredited disaster management training, including basic firefighting and first aid. A WhatsApp group and other forums were established for EMP's to collaborate. - Tailings facility visits were conducted for community leaders and EMPs to enhance their understanding of TSF operation, risks and the controls in place. - Involved community leaders, community EMP's and external support to develop evacuation routes, evacuation points, and other relevant parts of emergency response plans. They also involved schools, local police, taxi association, provincial and district disaster management departments. The above actions took place after the main site assessment and their effectiveness was not confirmed through community interviews and other follow-up.
Corrective Action(s)	The site has completed all the 15 community emergency drills for the affected communities in line with the global industry standard for management of tailings framework and in line with UN APELL guidelines (with 13 of the 15 drills concluded at the time of verification). The site will continue with its management routines per the drill plans, and thus allow for verification of actions taken along with their effectiveness to be confirmed through community interviews and other follow-up steps during surveillance.
Finding Number	**3452.IRMA.02/03**
Requirement	2.6.2.1. Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.
Critical	Yes

Rating	Substantially Meets
Justification	As a closure plan was not a legal requirement at the time operations commenced, the auditor reviewed the closure plan dated November 2022, and found the plan to comply with the requirement.
Corrective Action(s)	As Mogalakwena Mine existed prior to legal requirements relating to closure, full conformance with this requirement is not possible and will remain a legacy issue. However, Mogalakwena mine has 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. Site will continue its work in alignement with the AA Mine Closure toolbox, which includes the staged process of updating its closure plans towards finalisation (considering the operations' remaining life of mine). Closure cost liability assessments will be continued annually with the inclusion of considerations towards social closure.
Finding Number	**3452.IRMA.02/04**
Requirement	2.6.2.6. 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.
Critical	Yes
Rating	Substantially Meets
Justification	The mine currently has no mechanism in place to make the reclamation and/or closure plan publicly available. The mine does however report that if a stakeholder should request a copy of both or one of the reports a mechanism is in place to make the requested report/s available.

Corrective Action(s)	Mogalakwena mine in alignment with AAP will undertake a process to evaluate the need and formalise the appropriate mechanisms that will make the most recent version of the reclamation and mine closure plans, including the results of all reclamation and closure plan updates, publicly available or available to stakeholders upon request.
Finding Number	**3452.IRMA.03/01**
Requirement	3.1.2.1. The operating company shall respect the rights of workers to freedom of association and collective bargaining.
Critical	Yes
Rating	Substantially Meets
Justification	The Group Human Rights Policy includes a commitment to the International Labor Organization's fundamental labor rights, respect for the right to freedom of association and collective bargaining, and the right to equal remuneration for equal work. Implementation of the site recognition agreement (collective agreement) with the National Union of Mineworkers confirms respect for workers rights directly employed by the operating company. On-site interviews with Anglo American employees and managers confirm awareness of unions and the right to join or not join a union. Union representation is available to members during grievance processes. Unions and management hold regular meetings to discuss relevant issues at national, regional and site levels. Interviews with union representatives confirm adherence to the recognition agreement terms, conditions, and intent. Interviews with contracted workers indicate there is virtually no union membership in the business partner workforce. Interviews with workers suggest business partners and suppliers may not favor unionization of their workforce. Some contracted workers also indicated the perception that expressing an interest in joining a union could result in their termination from contracted employment. While there is strong evidence the

operating company respects the right of workers to associate and collectively bargain, it is uncertain whether the rights of contracted workers, who make up approximately 80% of the site's workforce, are fully respected by business partners. It could not be verified if the South African Constitution's protection of the right to freedom of association or the Group Responsible Sourcing Standard for Suppliers (Section 3.5) was being implemented.

Since the Stage 2 assessment and based on the findings above from on-site confidential interviews regarding the general absence of unionization of contracted workers in the Mine's overall workforce, the Site implemented a third-party analysis of contracted companies that found approximately 80% compliance with freedom to associate requirements of the Group Responsible Sourcing Standard. Mogalakwena has requested South Africa Department of Labour audits on a quarterly basis to verify compliance with national law and constitutional requirements. The employee and contracted worker induction presentation has been updated to emphasize the rights of workers to freely associate. Refresher sessions will be held with workers every 18 months. Awareness sessions have been and will be held with business partners and managers. Mogalakwena reports receiving an inquiry from a business partner on the process for establishing an agreement with a union. Shop Steward onboarding has been updated. A Visible Felt Leadership campaign has been implemented to highlight, among other topics, the rights of workers to freely associate. Procurement Department managers will also receive training with respect to contract requirements and freedom of association.

Mogalakwena reported that an internal analysis of contractor companies also concluded that some smaller local suppliers did not have adequate or fully qualified human resource management personnel. Over the long-term, the Site intends to make improvements to its Contractor Social Management process.

Corrective Action(s)

Mogalakwena Mine respects the rights of workers to freedom of association and collective bargaining, and continues with its engagements with the National Department of Labour supporting its compliance activities on business partners. Site will continue its management routines regarding awareness raising, Visible Felt Leadership and Business Partner engagement. To further embed this requirement, site will continue with its implementation of Responsible Sourcing standard, Contractor Social Management and Contractor Performance Management frameworks supported by policies & procedures.

Finding Number	**3452.IRMA.03/02**
Requirement	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.
Critical	Yes
Rating	Substantially Meets
Justification	Evidence provided (implementation of the Living with Dignity Hub, induction materials; general manager message regarding gender-based violence, YourVoice anonymous grievance mechanism, Women in Mining initiative, induction training, implementation of panic button system on site vehicles) demonstrates actions to prevent harassment and intimidation, especially of female workers. However, on-site interviews with employees and contracted workers indicate both specific instances and the potential for harassment of women, especially contracted female workers whose lack of job security may reduce the likelihood of their use of available grievance mechanisms.
Corrective Action(s)	Mogalakwena commits to deepening a culture of social justice and human rights, and thus will continue with the implementation of the Living with dignity program to continue in its efforts to better understand the root causes of prejudice and promote a culture where all employees feel comfortable using the available grievance mechanisms where necessary. This will be coupled with continuation of the bullying, harassment and victimization training.
Finding Number	**3452.IRMA.03/03**
Requirement	3.1.5.1. The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:

a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;
b. Shall allow for anonymous complaints to be raised and addressed;
c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and
d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

Critical Yes

Rating Substantially Meets

Justification The site has several internal grievance mechanisms accessible on multiple platforms to permanent Anglo American employees and contracted business partner workers, including the Living With Dignity Hub and the anonymous YourVoice process. However, review of the grievance register for Anglo American employees documents an extremely small number of grievances to date in 2023. Management interviews indicate an informal process is used to resolve grievances, sometimes with union participation, but that this process is not documented.
Approximately 80% of the mine's workforce are contracted through the operating company's business partners. Multiple worker interviews highlight business partners may or may not provide their workers with signed contracts (a requirement under South Africa's Basic Conditions of Employment Act and the operating company's Responsible Sourcing Standard for Suppliers). As a result, grievances may not be lodged (especially in cited instances where there is a perceived power imbalance between a contracted worker and a permanent employee). Business partner grievance processes, if they exist, were not provided as evidence. Grievances which may be lodged with business partner employers are not managed / facilitated through the operating company's contractor management or employee relations departments. Management interviews indicated that a Department of Labor audit of business partners was undertaken in 2022, but the findings from this audit were not available for review at the time of undertaking this assessment.
Since the Stage 2 assessment, Mogalakwena has undertaken an internal analysis of the grievance procedure process that concluded employees and contracted workers were not sufficiently aware of the grievance

	procedure or uncertain how to lodge a grievance. An analysis also concluded that some smaller local suppliers did not have adequate or fully qualified human resource management personnel. Over the long term, the site intends to make improvements to its Contractor Social Management process. The Grievance Procedure has been reviewed and updated. A brochure explaining grievance procedures has been developed and posted in various locations on-site. Versions in languages spoken locally are in development. While numbers remain low in relative terms, the site notes several instances where contracted workers have approached the Mine to resolve grievances in relation to required Unemployment Insurance Fund (UIF) deductions or wages. The site noted sixteen (16) cases reported to the Living With Dignity hub, of which 70% were lodged by contracted workers. While these cases were predominantly not related to employment or workplace conditions, the site indicates full or partial resolution in all instances. Mogalakwena acknowledges the current informal and undocumented process for resolving grievances (with or without union participation or representation in the resolution process). A Visible Felt Leadership campaign, updates to grievance procedures and awareness information are intended to assist in improving the effectiveness of implemented grievance mechanisms.
Corrective Action(s)	Mogalakwena Mine respects the rights of workers and endevours to ensure that they access to a functional grievance mechanism. As indicated, the site has a variety of grievance mechanisms in place and will continue working on increasing confidence in the mechanisms in place. Site will continue its management routines regarding awareness raising, Visible Felt Leadership and Business Partner engagement. To further embed this requirement, site will continue with its implementation of Responsible Sourcing standard, Contractor Social Management and Contractor Performance Management frameworks supported by policies & procedures.
Finding Number	**3452.IRMA.03/04**
Requirement	3.1.8.1. The operating company shall not employ forced labor or participate in the trafficking of persons.
Critical	Yes

Rating	Substantially Meets
Justification	From the evidence provided (code of conduct, responsible sourcing standard for suppliers, human rights policy, and the modern slavery report), supported by on-site interviews with managers, employees, and contracted workers, there is no indication that the operating company employs forced labor or participates in human trafficking. However, evidence demonstrating effective due diligence on the site's supply chain was not provided for review.
Corrective Action(s)	Though Mogalakwena does not employ forced labor or particpitate in trafficking of person and neither does it promote these activities, to further bolster its stance, Mogalakwena will continue with its implementation of the Responsible Sourcing standard and associated 3rd party due diligence activities.
Finding Number	**3452.IRMA.03/05**
Requirement	3.2.4.1 The operating company shall implement measures to protect the safety and health of workers including: a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.

Critical	Yes
Rating	Substantially Meets
Justification	Measures are in place to protect the health and safety of employees in line with statutory requirements in the Mine Health and Safety Act and related regulations and other relevant legislation. These are also tested on a regular basis by audits and inspections by relevant authorities. a. Various means of communication are in place to ensure employees are aware of risks at work including - email communication, noticeboards, training sessions, etc. At the beginning of every shift a line-up meeting is held to discuss daily work plans, and health and safety. Programs are in place for the awareness of noise and provision of protection against identified hazards. There is communication to employees of their right to complain. b. The company provides personal protective equipment (PPE) at no cost to employees. Interviews at Stage 2 indicated this was also the case for contractors. Mine has a program for equipment inspections. c. Mine has programs for first-aid availability and procedures exist to manage first aid or more serious incidents. First aid equipment is inspected monthly. Where deficiencies are found they are immediately corrected by replacing the deficient item / bag. The mine has contracted emergency medical services (EMS) to respond to all incidents, including injuries and illnesses, at no cost. The service is also extended to neighboring communities at no cost. d. Training is given to employees to protect health and safety, including safety inductions and other safety-related training. e. There are supervisors on every shift. Procedures are in place to ensure that employees are not exposed to hazards while performing work at the mine. Various other procedures exist for the healthy and safe execution of work. f. Provision of underground location tracking was not addressed at the time of the audit, as the underground operations were considered out of scope. Site observations at Stage 2 included visits to and some related worker and supervisor discussion at: south concentrator, heavy equipment shops, drilling and blasting operations, pit operations overview, fueling locations, tailings storage facilities, return water dams, waste salvage yard, and general waste landfill, and discussion or remote observation of activities at crushers, ore stockpiles and waste rock dumps.

	The behaviors, conditions, and processes noted during the visit can generally be characterized as satisfactory from a health and safety standpoint, with a few exceptions recorded elsewhere, where relevant to individual IRMA requirements. Gaps that were noted in some locations, but not across all locations visited, included: - Some business partner (contractor) employees reported receiving only one or two personal protective equipment (PPE) work uniforms per year. In the case of workers fueling haul trucks, they indicated that they sometimes had to wear soiled/fuel-stained clothing to complete a shift as they did not have spare PPE to change into. For fuel-soaked clothing, this represents a risk of contact dermatitis and diminishing/negating fire-protection. - Some locations did not have adequate provision for eyewash/safety showers - most notably at the heavy equipment shop, where existing installations were disconnected, and at the temporary fueling site, where there were no such facilities at all.
Corrective Action(s)	Protection of the health and safety of workers is a continuous process and includes: a) Assessing and mitigating risks b) Updating of Governance and training documentation c) Capacitation of workers and emergency response teams d) Adequate supervision e) Monitoring and reporting processes in place to track our compliance with health and safety requirements With this, the implemented measures can be verified during the surveliance audit. Mogalakwena will continue to implement its management routines inclusive of the Visible Felt Leadership routines.
Finding Number	**3452.IRMA.03/06**
Requirement	3.3.1.1.1. The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered: a. General mining operations; b. Operation of mine-related equipment or vehicles on public roads;

c. Operational accidents;
d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);
e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);
f. Mining-related effects on community demographics, including in-migration of mine workers and others;
g. Mining-related impacts on availability of services;
h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and
i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project.

Critical Yes

Rating Substantially Meets

Justification According to the operator, the health impact assessment (HIA) was approached in a phased manner as per the Social Way Section 4C methodology, initiating with a scoping study that was concluded in March 2021, and followed up from May to September 2021 with baseline data collection to better understand the internal and external context. Importantly, and as per the 4C guideline, the HIA is considered to include both community health and community safety considerations, and thus any reference to the HIA or health impacts in isolation, is considered to include community safety as relevant.
Mine personnel stated that the assessment was outsourced and was consistent with IRMA requirements.
Review of the scoping report appears to indicate that it is complete and meets IRMA requirements.
Site verification did not reveal any current significant potential risks and impacts to community health and safety that had not already been identified. Risks throughout the life cycle of the mine had not been thoroughly explored, however.

Corrective Action(s)	Mogalakwena acknowledges that in light of its long remaining life of operations (in excess of 50yrs) and in alignment with its mine closure toolbox framework requirments, closure and post closure related risk may not have been adequately explored and integrated into the baseline WRAC. Mogalakwena will continue to review and/or revise its health impact assessment, along with further integration into the baseline WRAC and closure risk and liability assessments.
Finding Number	**3452.IRMA.04/01**
Requirement	4.1.4.1. A risk-based approach to mine waste assessment and management shall be implemented that includes: a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle; b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle; c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).
Critical	Yes
Rating	Substantially Meets
Justification	Although rigorous risk assessment on the mine waste facilities is undertaken through the site's quarterly and monthly tailings storage facilities reviews, engineer or record, independent tailings review panels, environmental management program and Integrated Water and Waste Management Plan (IWWMP) actions and Global Industry Standard for Tailings Management (GISTM) assessment, the site wide baseline risk assessment is in the process of being updated.

Corrective Action(s)	The update of the site wide baseline risk assessment is a comprehensive process but also undertaken on an ongoing / continuous basis. Implemented activities can be reviewed as part of the surveillance audit, however, Mogalakwena will continue to update its baseline risk assessment.
Finding Number	3452.IRMA.04/02
Requirement	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).
Critical	Yes
Rating	Substantially Meets
Justification	The Vaalkop #1 and #2 tailings storage facilities were not designed with liner systems in place (historical facilities). However, Blinkwater #1 does have a liner system. As part of the design of the new Blinkwater #2 tailings facility, the classification of the mineral waste stream will determine the most appropriate lining system. Waste classification is one of the mechanisms that is used to consider best available technologies/best available practices in managing the risks associated with the tailings storage facility. The installation of a liner system most suited to contain the type of tailings waste is the best available practice in terms of tailings management and industry best practices. The site-wide baseline risk assessment, which aims to identify all mine-related activities that have priority unwanted events, is in the process of being revised/updated. Tailings deposition ceased at Vaalkop 1 in July 2021 and ceased at Vaalkop #2 in December 2021. These tailings facilities were placed into care and maintenance due to stability concerns, considering the brittle behavior of the tailings and foundations soils. The introduction of waste rock buttressing is the best available practice to prevent catastrophic tailings dam failure

Corrective Action(s)	The update of the site wide baseline risk assessment is a comprehensive process but also undertaken on an ongoing / continuous basis. Implemented activities can be reviewed as part of the surveillance audit, however, Mogalakwena will continue to update its baseline risk assessment.
Finding Number	**3452.IRMA.04/03**
Requirement	4.1.5.6. On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d. Inform the management review to facilitate continual improvement (see 4.1.5.8).
Critical	Yes
Rating	Substantially Meets
Justification	An assessment was completed of the facility performance against the main trigger action response plans (TARPs) and critical controls during the third quarter of 2023 (June 2023 to August 2023), as well as the various actions to be taken in the case of a non-conformance. Actions to remedy non-conformances are managed through the Isometrix system, where each responsible person is allocated an action with a target date. The monthly monitoring reports, including monthly deposition trends (compiled using the tacheometric freeboard surveys conducted and supplied by the mine) and tailings storage facility (TSF) drone reports (compiled using photogrammetric drone surveys conducted by the mine), were completed. Although the Global Industry Standard for Tailings Management (GISTM) assessment and other risk management measures (Tailings review panels, Engineer of Record reviews etc.) have been completed for the mineral residue facilities, the site-wide baseline risk assessment is in the process of being updated.

Corrective Action(s)	The update of the site wide baseline risk assessment is a comprehensive process but also undertaken on an ongoing / continuous basis. Implemented activities can be reviewed as part of the surveillance audit, however, Mogalakwena will continue to update its baseline risk assessment.
Finding Number	**3452.IRMA.04/04**
Requirement	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 groundwater quality and quantity related to the mining project; and b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.
Critical	Yes
Rating	Substantially Meets
Justification	The mine submitted the Operational Plan, Mogalakwena complex, Water Quality & Quantity Operating Procedures & Adaptive Management Plan (AMP), dated 4 September 2024, for review. a. Sections 1-7 of the plan describe the current ground and surface water conditions at Mogalakwena, as well as the key risks and monitoring program. Mitigation against current impacts on surface water and ground water quality is addressed through monitoring programs. Water is sampled and analyzed at intervals as per the program. In 7.3 the groundwater abstraction and storage are discussed in a short paragraph. No water balance was included or referenced in the AMP, but the mine maintains a comprehensive water balance, separately. There is no process described in the AMP to identify and include future uses, such as those related to underground development of the mine, for example. These are addressed in project-specific plans. Section 9 of the AMP states that the current plan is a pilot version for implementation and will be updated following a

12-month pilot phase. However, the update criteria are focused on identifying new or revised trigger levels and do not include anticipated or potential future changes in surface water and groundwater quality and quantity related to the mining project.
b. Section 8 of the AMP describes the trigger response and adaptive management action plan. Section 8.1 : Trigger response action plan for water quality and Table 8.2 : Trigger response plan for water quantity. It is not clear in table 8.1 and 8.2 how the mine plans to address 'adaptive water management'. Furthermore, it is not only the Trigger action plan that addresses adaptive water management. The predicted impact and changes that the mining activities will have on the quality and quantity of water for future uses (including post closure) is not addressed as per the requirement. Mine personnel stated that the significant remaining life of the mine meant that consideration of post- closure was not relevant at this time, but did not provide a technical analysis to support this position.
No water balance was referenced in the AMP, but the mine maintains a comprehensive water balance, separately. There is no process described in the AMP to include future uses, such as those related to underground development of the mine, for example. These are addressed in project-specific plans. Section 9 of the AMP states that the current plan is a pilot version for implementation and will be updated following a 12-month pilot phase. However, the update criteria are focused on identifying new or revised trigger levels and include anticipated or potential future changes in surface water and groundwater quality and quantity related to the mining project.
Mine personnel stated that the significant remaining life of the mine meant that consideration of post-closure was not relevant at this time, but did not provide a technical analysis to support this position.

Corrective Action(s)

Mogalakwena wil continue with its implementation of the Adaptive Water Management plan. A revision of the documented plan will be undertaken to further expand on how the TARPS will be used whilst ensuring that the relevant documents that underpin this plan are also referenced in the plan.

Finding Number	**3452.IRMA.04/05**
Requirement	4.3.2.1. If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.
Critical	Yes
Rating	Substantially Meets
Justification	The operation has developed and implemented an air quality management plan with the aim to avoid, minimize, mitigate and manage any adverse impacts arising from activities at Mogalakwena Complex related to potential airborne contaminants, principally fugitive dust. Review shows that several controls are detailed in the air quality management plan related to a range of activities. The air quality management plan considers current and additional planned mitigation measures. Implementation activities completed include dust suppression on roads, vegetation on tailings, reduced vehicle speeds and a control system to monitor speed. Deposition at Run of Mine and Waste Rock Stockpile were determined to be most significant due to proximity to sensitive receptors and difficulty implementing effective controls. New controls included slower dumping, rotational water sprays, slope management, and vegetation growth on topsoil. All significant air impacts were related to dust. No vehicle emissions or other emissions were deemed significant enough to need control. The mine is currently trying to develop predictive monitoring. Observations and discussions during Stage 2 showed that, while substantial dust generation is observed in many areas of the mine, the community impacts are monitored appropriately and are within IRMA limits.

Corrective Action(s)	Mogalakwena mine endeavours to minimize and mitigate against its impacts beyond the operational boundary. As such the site will continue with its implementation of the Air Quality Management Plan along with maintaining its rigor in monitoring for and addressing community impacts appropriately.

Endnotes

[1] Mogalakwena Local Municipality – Overview. https://municipalities.co.za/overview/1139/mogalakwena-local-municipality

[2] UNESCO. Waterberg Biosphere Reserve. https://www.unesco.org/en/mab/waterberg

[3] SRK Consulting. Final Environmental Impact Assessment and Environmental Management Programme Report. https://sahris.sahra.org.za/sites/default/files/additionaldocs/532330_Final%20Mogalakwena%20Expansion%20Project%20EMPrs%20Amendment_Final_20191106%20R.pdf

[4] Ibid.

[5] Ibid.

[6] Anglo American. Mine profile: Mogalakwena. https://www.angloamerican.com/our-stories/innovation-and-technology/mine-profile-mogalakwena

[7] https://tools.responsiblemining.net/self-assess/

[8] 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/resources/#verification-body-program-documents

[9] See IRMA Certification Body Requirements, Sections 5.2, 7.1, 7.2, and Annex B. https://responsiblemining.net/resources/#verification-body-program-documents

[10] See IRMA Certification Body Requirements, Section 9.4. https://responsiblemining.net/resources/#verification-body-program-documents

[11] IRMA website: "Complaints and Feedback." https://responsiblemining.net/what-you-can-do/complaints-and-feedback/

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

[13] Complaint #IRMA-2024-004. https://responsiblemining.net/what-you-can-do/complaints-and-feedback/complaint-irma-2024-004/

[14] Complaint #IRMA-2024-005. https://responsiblemining.net/what-you-can-do/complaints-and-feedback/complaint-irma-2024-005/