IRMA Initiative for Responsible Mining Assurance

IRMA SURVEILLANCE ASSESSMENT PUBLIC REPORT

MINE SITE

Mototolo

OPERATING COMPANY

Valterra Platinum

COUNTRY OF OPERATION

South Africa

13 NOV 2026

Acknowledgements

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

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

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Audit Details

Name of Mine:	Mototolo Mine
Operating Company:	Valterra Platinum
Mine Owner:	Valterra Platinum
Country of Operation:	South Africa
Mined Material(s):	Platinum, Palladium, Rhodium, Iridium, Ruthenium, Gold and Chrome
# Employees / contractors:	1,649 employees and 3,726 contractors at the time of audit (5,375 total workers)
IRMA Audit Page:	https://responsiblemining.net/Mototolo
Audit Type:	Surveillance Audit
Audit Dates:	Desktop review: 09 October 2025 Onsite visit: 11 November 2025 (virtual) & 24-26 November 2025 (onsite)
Audit Team:	Lead/EHS Assessor (1) EHS Assessor (1) Social Assessor (1) Social Support/Translator (2)
Audit Firm Declaration:	✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) considered within the scope of the Surveillance audit activities. ✓ The audit team members were deemed to have no conflicts of interest with the mine. ✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities. ✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.
Scope of Audit	The scope includes extraction, concentration, and processing of ore, and mining-related waste disposal at the Mototolo Complex located in the Limpopo province, South Africa.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
IRMA Achievement Level:	IRMA 75
Achievement Decision Date:	16 February 2024
Achievement Expiration Date:	16 February 2027
Authorized Representative:	Glenn Keays, ERM CVS, Director, Operations (Mining)
Representative Signature	
IRMA Reference Number:	IRMA-0145-STD01.0-01-SRV-EN

1. Mine Site Overview

1.1. Overview of location

Mototolo Mine lies in the north-eastern part of South Africa, in Limpopo Province, on the eastern limb of the Bushveld Igneous Complex. The consolidated "Mototolo – Der Brochen Complex," is a platinum-group metals (PGM) mine, extracting ore containing platinum, palladium, rhodium, ruthenium, gold — and other associated metals (nickel, copper, chrome) via several shafts and concentrating the ore on site.

The mine is located about 50 km west of the town Burgersfort, within the local municipality Fetakgomo Tubatse Local Municipality (Sekhukhune District). Nearby communities include small towns and villages: for example Ga--Malekana is ≈ 15 km north-west of the site; other closer settlements include Ga--Masha, Madidimola, as well as the larger town Burgersfort itself.

The broader landscape includes other mining operations — the mine is bounded by other PGM/chrome mines: to the north by among others Two Rivers Platinum Mine and Dwarsrivier Mine, and to the south by Booysendal Mine.

The Mototolo Mine lies in mountainous terrain, with elevation ranging from around 940 metres up to over 2,000 metres above mean sea level. The mine area is within habitat types described as "Open Bushveld" and "Sekhukhune Mountain Bushveld," which are recognised for relatively high biodiversity and environmental sensitivity. The entire area is considered significant from a conservation standpoint. The closest nature reserve is the Lapolisas Wilderness, located about 15 km to the north-east of the mine.

Surface water drainage from Mototolo is via several unnamed ephemeral tributaries and drainage lines; these drain into the perennial Groot-Dwars River. Groundwater and surface-water hydrology are potentially significant for downstream ecosystems and human uses.

The orebody exploited at Mototolo is part of the layered rock sequences of the Bushveld Complex — specifically the "UG2 Reef", containing ores of platinum-group metals (PGMs) along with some associated chromite. The mine sits on a structural setting complicated by faulting: a regional fault (the St George fault) traverses the mine, causing a displacement between eastern and western parts; near the fault there is a wide "damage zone" of fractured rock. This plus dolerite/diabase dykes cutting across the area influence stability, groundwater flow, and mining viability.

The first shaft-portal development at Mototolo began in November 2005. Two main decline-shaft systems — named Lebowa Shaft and Borwa Shaft — were initially established. The first ore extraction from Lebowa began in April 2006, and from Borwa in August 2006. The mining method is fully mechanised, using a "bord-and-pillar" technique to mine the UG2 horizon, at depths from near-surface to about 450 m below surface.

In 2021, the Der Brochen Project was initiated, developing the Der Brochen shaft, and integrating this resource with Mototolo's infrastructure, effectively consolidating the Mototolo Mine and the Der Brochen resource as a unified complex. The mining right covers about 9 km².

Historically, the mine was developed as a 50:50 joint venture (JV) between major mining interests, though later ownership was consolidated under Anglo American Platinum

Figure 2: Global Location of Site

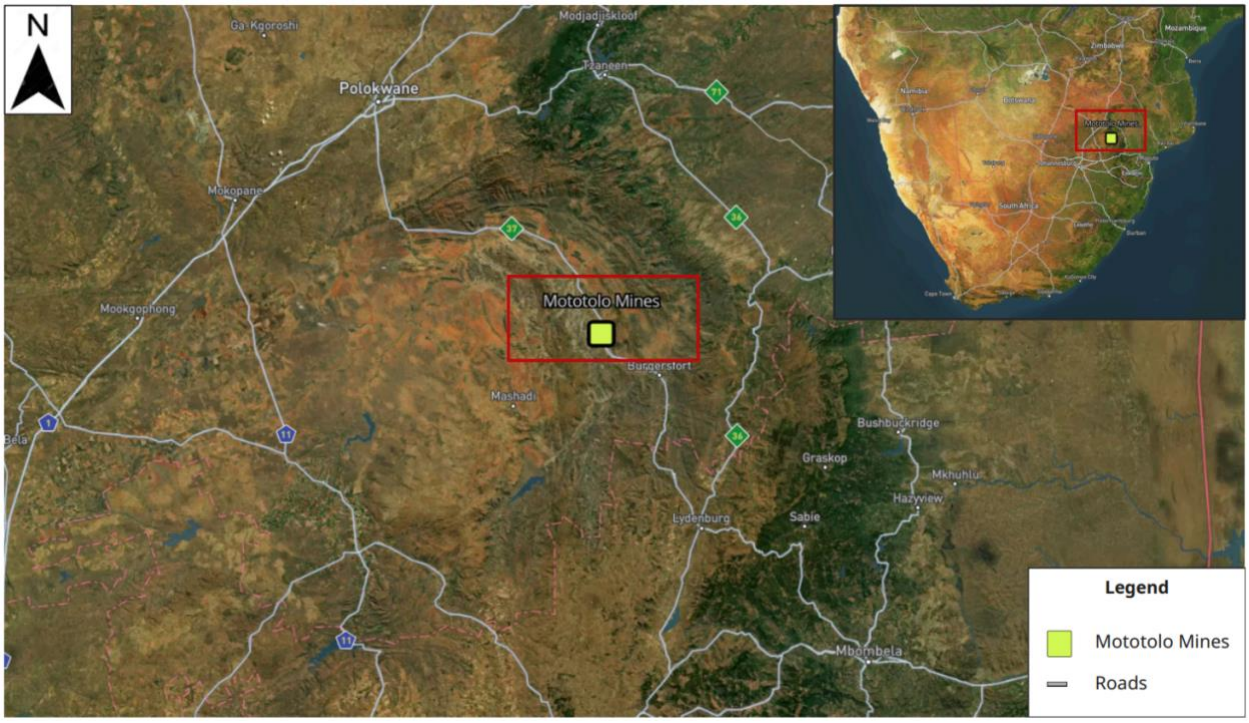
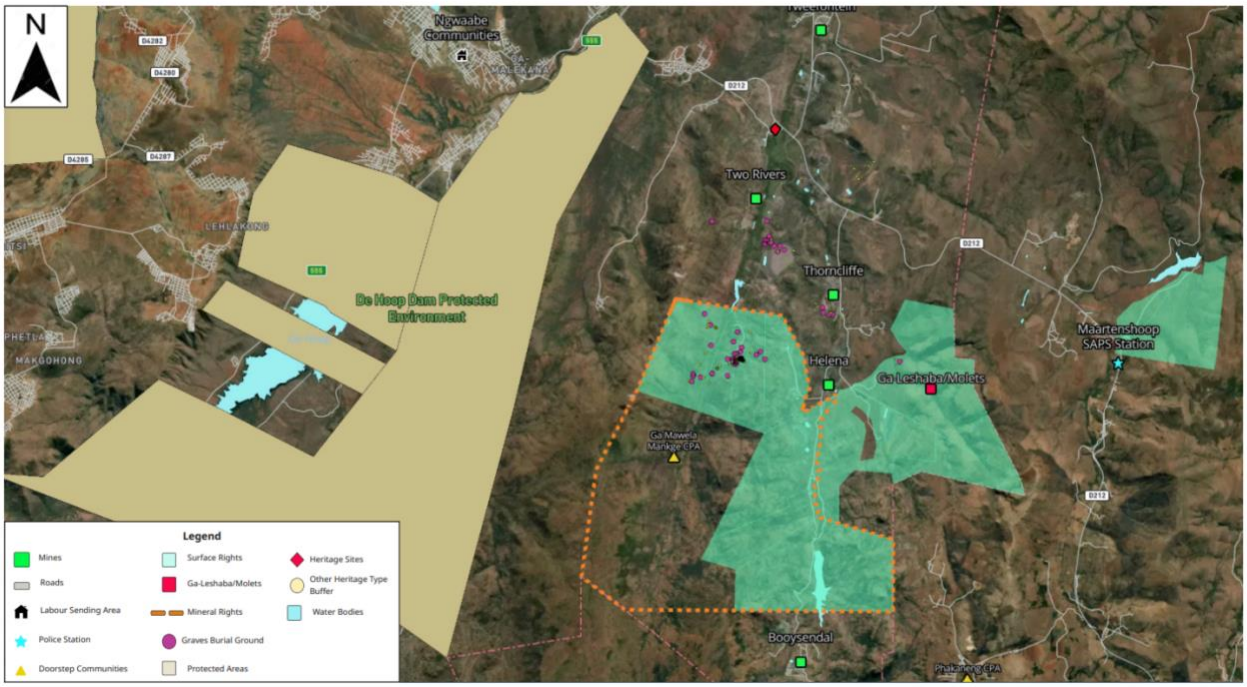


Figure 1: Regional Location of Site



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

Around Mototolo, land use includes agriculture and game farming, reflecting a mix of rural livelihoods.

As part of a "heritage impact assessment" for expansion/development, a survey conducted in 2021 recorded cultural-heritage features within the footprint (including burial sites and possible Iron Age ephemeral walling), indicating human presence and use of the area long before the mine.

Figure 1 provides a general map indicating the global location of the mine site. Figure 2 provides a regional map of the mine site location.

1.2. Overview of operation

The Mototolo/Der Brochen infrastructure comprises three main decline shafts: Lebowa Shaft, Borwa Shaft, and the newly developed Der Brochen shaft. The mining method is fully mechanized, "trackless" — using a bord-and-pillar underground method. Ore from underground is transported via an over-land conveyor system from the Lebowa and Borwa shafts, and by truck from the Der Brochen shaft to an on-site concentrator.

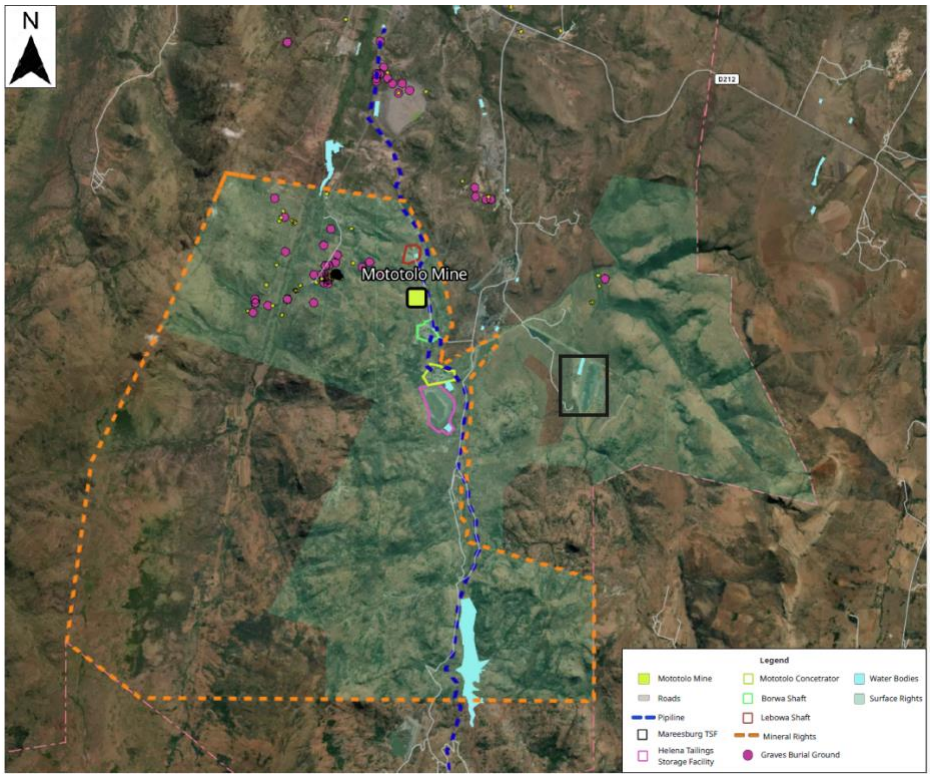


Figure 3: Layout of Site Operations

The concentrator processes "run-of-mine" ore delivered from underground to produce platinum-group metal (PGM) concentrates plus chrome. The concentrator includes jaw crushers, mills, flotation circuits, a chrome-recovery plant, and subsequent tailings management infrastructure.

Waste tailings are deposited into the Mareesburg tailings-storage facility. The older Helena Tailings Storage Facility (TSF) (operational from 2006) is in care-and-maintenance status, and the newer Mareesburg TSF (constructed 2018) is the operational site for disposal of processed tailings material. Water from the tailings facility is recycled back to the concentrator.

As of 2025, the Mototolo Complex employed roughly 5,464 people (employees + contractors).

Figure 3 presents the physical configuration of site operations.

1.2.1. Scope of activities and facilities included in audit

The operations and activities in scope for the Valterra Platinum Mototolo surveillance audit included:

- Three decline shaft systems with crushers – Mototolo Lebowa (north), Mototolo Borwa (south), and Der Brochen
- Above ground conveyor systems from Lebowa Shaft, connecting through Borwa Shaft to the Mototolo concentrator
- Mototolo concentrator
- Tailings Storage Facilities including, the Helena TSF (operational from 2006 and now at its end of life) and the newer Mareesburg TSF (constructed in 2018 and in phase 4)
- Waste Rock Disposal Areas
- Ancillary activities, both on-site and off-site, such as:
    - Various workshops supporting maintenance and upkeep of mobile and fixed equipment for mining and processing,
    - Waste and chemical management,
    - Operation of occupational health and other medical facilities.

1.2.2. Activities or facilities excluded from scope of audit

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

1.2.3. Limitations of audit

This surveillance audit was conducted within an abbreviated scope and timeframe, consistent with IRMA requirements for surveillance assessments. For this reason there were constraints to stakeholder engagement.

Firstly, there were adjustments to worker interviews where necessary to accommodate some minor and unavoidable schedule changes by the auditors, due to travel times or administrative hold ups with security access or safety inductions. This resulted in combining some individual interviews, or substituting a small number of workers, when it was discovered that planned interviewees were not on-shift, or were unable to attend for other reasons. These changes impacted a relatively small number of interviewees and did not materially affect the outcome of the interview process. Any interview substitutions were made using a list of back-up interviewees developed by the social auditor to maintain objectivity and sample representation. Secondly, external stakeholder engagement was subject to several limitations that reduced both its extent and depth.

- The most significant constraint was related to personal safety risks associated with travel to surrounding communities. While the audit team was informed during the planning stage that engagement could be challenging, the extent of these risks became clearer upon arrival. Site management advised that travel to communities posed elevated security risks, reportedly higher than during the previous audit. Although ERM CVS did

not independently verify these risks through a formal field assessment, due to the absence of dedicated security resources, transport, and sufficient time, the audit team drew on prior stakeholder communications , previous site experience, and broader experience in similar South African mining contexts. Based on this, the audit team identified a credible personal safety risk associated with travelling to dispersed community locations without appropriate security arrangements.

- Engagement was conducted at a controlled, off-site venue, which was considered the safest and most practical option given the constraints. This approach also reflected logistical challenges, including the wide geographic spread of settlements, difficult road conditions, and limited secure meeting locations within communities.
- While necessary, this approach limited some stakeholder participation. The mine did not provide transport or stipends to support attendance. Although the mine indicated that stakeholders could request transport, the audit team did not find evidence that this was widely understood. Due to the location of the meeting venue and dispersed nature of communities in the area, some stakeholders were unable to attend, and some attendees expressed dissatisfaction with travelling at their own cost. In addition, arrangements related to access and communication of the voluntary nature and purpose of engagement were not consistently understood by all participants.
- Poor cellular coverage at the mine site and telecommunications outages near the audit team's accommodation and meeting venue prevented follow-up with stakeholders who had submitted written comments. While these submissions were reviewed, additional verification or dialogue could not be undertaken in all cases.
- Two incidents further reinforced the safety risks. In one instance, a planned engagement became hostile and escalated to threatening behaviour, leading the audit team to halt the interview and relocate. In another instance, a stakeholder interaction via text became hostile and threatening, preventing further engagement. No additional external engagements were pursued after this point in order to prioritise auditor safety.

As a result of these combined constraints, stakeholder input was considered alongside document review, site observations, and interviews with mine personnel. Findings were based, therefore, on triangulation of available evidence within the scope of a surveillance audit. Areas where engagement was limited or inconclusive have been identified for follow-up during the next full (renewal) audit.

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

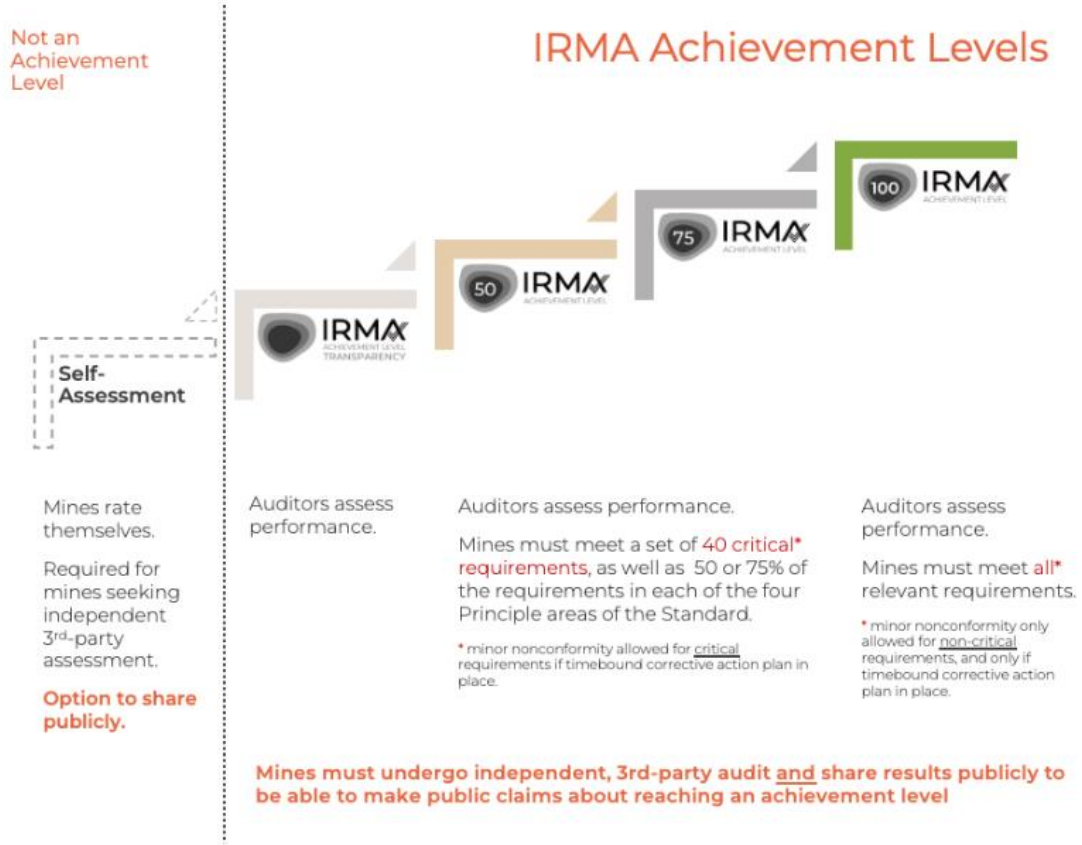
2. Mine Site Assessment Process

2.1. Overview of IRMA Process

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

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

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



2.1.1. Surveillance Audit Process

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

2.1.2. Scope and Limitation of Audits

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

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

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

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

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

2.1.3. IRMA Complaints Process

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

2.2. Surveillance Audit Process

The surveillance audit process includes a desktop review and onsite audit by the audit firm. The on-site audit can include a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if

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

2.3. Stakeholder Engagement

Stakeholder engagement is an integral component of IRMA mine site assessments. For this surveillance audit, engagement was planned as a targeted exercise to inform review of selected requirements and progress on corrective actions, rather than a comprehensive engagement programme typical of a full (initial or renewal) audit. The audit team sought to engage with a cross-section of external stakeholders from the mine's area of influence, using a combination of pre-audit outreach, review of written submissions, and in-person engagements during the on-site audit.

Prior to the surveillance audit, the social lead auditor worked with the site team's selected stakeholders for follow-up. The selection of stakeholders was based on knowledge from the previous IRMA audit at the site, which helped focus the audit on key known stakeholder groups and allowed follow-up on key issues raised during the previous audit.

The external stakeholder engagement plan was developed through the collaboration of the mine's community and stakeholder engagement leads together with the ERM CVS social lead auditor. The stakeholders for engagement included those identified by the audit team and the mine site as most likely to represent a broad range of perspectives on the current state of the mine's alignment with IRMA requirements and specifically on the Corrective Action Plan.

The programme for engagement was based on:

1) Past evidence from the full initial audit
2) Information needed to confirm implementation of the Corrective Action Plan;
3) Time available for engagement;
4) Location of communities and representatives; and
5) Available resources (specifically telecommunications).

The mine-related stakeholders included doorstep/directly impacted communities, host/indirectly impacted community representatives, local government representatives, and recruitment forums. The audit team ensured that three "windows" were put into the schedule for additional engagement that were to be arranged by the auditors during the site visit. The aim of this was to include the three identified written respondents. These meetings could not be arranged prior to the site visit, as the Sepedi translator needed to be present with the auditor for the discussions; and due to telecommunications and experienced hostility during the site visit, these unplanned engagement could not take place.

All planned engagements took place as intended, with the exception of one with Consolidated Recruitment Forums, which were disrupted by representatives present and closed early.

Through stakeholder outreach and engagement activities conducted as part of the assessment process, stakeholders raised a range of issues and perspectives relating to the mining operation and the broader social, economic, environmental, and historical context of the Mototolo area. These themes were considered by the audit team in planning and conducting the assessment and, where applicable, informed lines of inquiry during document review, site inspections, and

interviews. Inclusion of a theme in this section does not indicate that the information provided by stakeholders was verified by the audit team, nor does it necessarily indicate a nonconformance with IRMA requirements.

2.3.1. Written comments/inquiries

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.

No formal or informal comments were received from stakeholders regarding the IRMA process between the initial audit (2022) and prior to the planning stage of the surveillance audit (2025).

On 24 October 2025, 30 days prior to the surveillance visit, the assessment was announced on the ERM CVS website, IRMA's website and LinkedIn page, and through IRMA's free distribution newsletter. The announcement included an invitation to stakeholders to submit written comments about the environmental and social performance of the Valterra Platinum Mototolo mine to the audit firm via email, online stakeholder feedback form or a dedicated voicemail line, and invitation to participate in the assessment. The announcement was prepared in English and Sepedi.

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

A total of 9 written submissions were received for the Mototolo Surveillance Audit. Three submissions were identified as relevant to the IRMA Surveillance Audit process and were acknowledged by the audit team via email response. The remaining six submissions appeared to reflect general comments or unrelated queries (e.g. stating simply "Experience with the mine" or "Jobs, any") and were therefore not pursued for follow-up, as they did not have direct relevance to the audit.

Summary of Written External Stakeholder Comments

Written submissions received from external stakeholders reflect a range of concerns and perspectives in relation to local socio-economic conditions, governance context, and interactions with the operation. The issues raised illustrate differing stakeholder experiences, priorities, and expectations.

The submissions were analysed across the following themes:

- **Local Employment and Procurement**

Written submissions reflected stakeholder perceptions regarding access to employment and procurement opportunities associated with the operation.

- **Community Development and Social Investment**

Stakeholders expressed views regarding the long-term impact of community development and social investment initiatives. Stakeholders emphasised the importance of initiatives that deliver lasting benefits and align with locally identified priorities.

- **Environmental and Health-Related Concerns**
  Some written comments raised concerns regarding potential environmental and health impacts, particularly in relation to dust and water.
- **Engagement and Grievance Mechanisms**
  Stakeholders emphasised the need for more consistent, inclusive, and responsive engagement and for grievance processes that are accessible, timely, and trusted.
- **Transparency and Accountability**
  Submissions highlight the importance of clear communication, transparency, and accountability in building and maintaining stakeholder trust.
- **Recruitment Challenges**
  One written submission raised concerns relating to recruitment practices While not substantiated during the surveillance audit, the issue has been documented for follow-up through appropriate processes.

Separately, a submission from a landowner representative raised concerns regarding formal recognition and clarity on engagement processes, highlighting sensitivities related to land access, representation, and historical context.

Overall, the written submissions provide insight into stakeholder perspectives and areas of concern. Given the constraints on direct engagement during this surveillance audit, these submissions were considered with other sources of evidence and have informed areas identified for further review during future audits with expanded stakeholder engagement.

2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts on one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

Position/Role
Section Manager Stakeholder Relations
Section Manager Environmental
Section Manager Contractor Management
Senior Manager P&O Operations
Section Manager Employee Relations
Safety, Health and Environment (SHE) Manager
Social Performance Specialist
Senior Manager Commercial
Corporate Affairs and Sustainable Impact Manager
Social Economic Development Manager

Emergency Prep and Response Coordinator
Protection Services Manager
Superintendent Occupational Hygienist
Senior Engineer Electrical and Energy
Section Manager Conservation
SHE Coordinator: Due Diligence and Audit
Section Manager Production Processing
Senior Engineer Mineral Residue Facilities
Environmental Specialist
Section Engineer Manager: Concentrator
Environmental Officer

2.3.3. Workers/Contractors

During the surveillance audit, ERM CVS conducted a total of 24 scheduled worker engagements, including 19 individual interviews, and 5 group interviews (3, 4 and 5 people). Interviews included a total of 40 workers.

Scheduled worker interviews were supplemented by 19 additional impromptu interviews with individuals or groups in various areas of the mine during the environmental, health, and safety portion of the onsite audit. In total, 59 workers were interviewed during the surveillance audit.

Prior to the onsite audit, ERM CVS selected a sample of workers and contractors for interviews. At the time of the onsite audit, the site reported 1,649 direct employees and 3,726 contractors (total 5,375 workers). The selection aimed to ensure diversity in age, gender, length of service at the Mototolo / Der Brochen Mine and role or function (including managers, coordinators, technicians, and machine operators), as well as the differing employment experience of direct employees and contracted workers.

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

At the scheduled worker interviews, typical topics discussed included:

- Employee contract, understanding and access to leave, pay and collective bargaining
- The mine's respect towards workers and their rights
- Any understanding of community benefits
- Health and safety on site, including personal safety, access to personal protective equipment (PPE), raising H&S-related issues, Stop-work Authority.
- Emergency planning and preparedness

- Access to, and management of, grievance mechanisms.
- Any notable discrimination, harassment, abuse or victimization.

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

Mine	Meeting type	Number of attendees	Notes
Lebowa Shaft	Individual Interviews	4 (3M, 1F)	4 x Employee, 1 Foreign national
	Group interview (Group of 4)	4 (4M)	4 x Employee
Der Brochen Shaft	Individual Interviews	4 (2M, 2F)	4 x Contractor, 1 x Management
	Group interview (Group of 5)	5 (5M)	4 x Contractor
Concentrator	Individual Interviews	6 (5M, 1F)	3 x Employee 3 x Contractor
Borwa Shaft	Individual Interviews	5 (3F, 2M)	4 x Employee 1 x Contractor
	Group interview (Group of 4)	4 (4M)	4 x Employee
	Group interview (Group of 5)	5 (5M)	5 x Employee
Mototolo Complex	Group interview (Group of 3)	3 (2M, 1F)	3 x Union Representatives
Total	40 scheduled interviews (32M, 8F)		

2.3.4. Local Communities, Government Agencies and NGOs

The audit included interactions with local municipal councilors and Community Property Associations (CPAs) as representatives of affected communities.

As stated in Section 1.2.3. (Limitations of audit) while engagement planning was undertaken prior to the audit, several challenges emerged during implementation that significantly impeded the execution of planned engagement activities.

External stakeholder engagement was constrained during the audit due to safety, logistical, and connectivity challenges. Elevated security risks associated with travel to surrounding communities, combined with limited transport arrangements and remote meeting locations, reduced stakeholder participation. Additional disruptions, including telecommunications outages and reported instances of hostile interactions, further limited engagement. As a result,

stakeholder input was considered alongside other audit sources, with gaps identified for follow-up during the next full audit.

Date	Community, NGO Name	Location of Meeting	Total Number of Attendees
25 November 2025	Pakaneng CPA	Buffelskloof Lodge	4 (4M)
	St. George Ga-Mawela CPA		4 (4M)
	Ward Councilors		5 (4M, 1F)
	Moletsi Noks Trustees		4 (2M, 2F)
26 November 2025	Abandoned meeting - Local community recruitment forums	Buffelskloof Lodge	8 (5M, 3F)
Total			25 (19M, 6F)

2.4. Summary of Mine Facilities Visited

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

Operational areas	Borwa Engineering Workshops Der Brochen contractor areas Lebowa Shaft Concentrator Waste management area at Lebowa Mareesburg Tailings Storage Facility (TSF)
Non-operational areas visited	N/A
Surrounding Communities	No surrounding communities were visited due to ongoing security concerns.

3. Summary of General Scope Items

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

3.1. General operational status

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

3.1.1. General outcome of compliance monitoring/audits

The mine carries out a three-yearly compliance audit by a contracted 3rd-party. This includes an evaluation of applicability and compliance against national and provincial legislation as well as requirements of various permits/licenses.

The mine received a Department of Mineral and Petroleum Resources (DMPR

) Presidential Audit in early 2025. This audit covered topics including occupational hygiene, occupational health, mine safety, and mine equipment. The initial audit identified 155 nonconformances. At the time of the surveillance assessment, causal analysis and action plan development was complete, and actions were being tracked in Isometrix. Most actions had been closed at the time of the surveillance assessment.

Additionally, there are a variety of Internal and external audits for a range of specific areas, such as radiation safety, environmental performance, and Valterra Technical Standards requirements, etc. These are managed through the assurance department.

Audit outputs and related corrective actions are managed through the mine's Isometrix action tracker or the Teammate / GRC Connect platforms. Compliance data is visible through a dashboard system, which is compiled into a monthly report and shared with corporate/group leadership.

3.1.2. Regulatory inspections, violations, enforcement actions

There were no recent public records of formal enforcement actions (e.g., fines, prosecutions) since the initial audit specifically against Mototolo or Valterra Platinum for environmental or safety violations (as of late 2025).

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

There are no recent (past 5–10 years) major verdicts or court judgments publicly reported against Mototolo Mine specifically for environmental- or community-rights violations.

The mine reported an ongoing issue related to grave relocations, for which the agreed settlement remains uncollected due to disputes amongst the plaintiffs.

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

Public records and Mototolo internal reports identified no major safety or environmental incidents since the initial IRMA audits in 2022.

The mine had more than 12 years of fatality-free mining as of the end of 2024 and has experienced a general downward trend in injury rates across its operations. However, the concentrator has experienced an increase in both Total Recordable Case Rate (TRCR) and Lost Time Injury Frequency Rate (LTIFR) from 2022 to 2024.

The mine reported zero high-severity (Level 3-5) environmental incidents since 2021.

Facility	2024	2023	2022
TRCR Mototolo concentrator	3.49	0.00	1.89
TRCR Mototolo Mine	2.89	2.02	3.23
LTIFR Mototolo concentrator	3.49	0.00	1.89
LTIFR Mototolo Mine	1.69	1.77	2.70

On 27 March 2026, a fatal incident occurred at the Borwa shaft involving a worker who was trapped by a Load Haul Dump machine. A preliminary report by the Department of Mineral and Petroleum Resources (DMPR) indicated that safety protocols were violated. This incident occurred after the completion of the IRMA surveillance audit and was therefore not considered within scope of this surveillance report. The findings of the DMPR and internal investigations will be reviewed at the next (renewal) audit.

3.2. Stakeholder considerations

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

In 2023, 16 grievances were recorded after the introduction of the new grievance procedure (May 2023), which included a clear reporting process and engagement protocol. Most concerns focused on inclusive procurement, with six grievances, followed by skills development and cultural heritage, which each accounted for three grievances. Recruitment issues were raised twice, and there were isolated complaints about unfair labour practices and social investment. The initial spike in grievances came soon after the revised procedure was implemented, largely driven by expectations around procurement and job opportunities.

In 2024, the number of grievances dropped slightly to 14, suggesting a more stable period. Issues were spread more evenly across key themes, with four grievances each for inclusive procurement, recruitment, and cultural heritage. Minor concerns also emerged about environmental impacts, specifically dust, and one grievance related to social investment.

By 2025, grievance activity increased, with 34 grievances logged. This increase was mainly related to inclusive procurement, which accounted for 18 grievances, and recruitment, which contributed 7 grievances. The increase in grievances during this period was primarily associated with inclusive procurement and recruitment-related issues. Many of these grievances arose during the period of development associated with the Der Brochen Project.

The key communities raising grievances with the site are:

- Steelpoort & Ngwaabe (broader area): More businesses with interest in mining, specifically Der Brochen Project development.
- Ga-Mawela Community Property Association (CPA) (host community): Large number of grievances related to skills development, employment, training, and inclusive procurement.
- Lydenburg communities (broader area): Grievances related to inclusive procurement and unemployment.
- Doorstep communities (Ga-Leshaba, Ga-Mawela and Pakaneng): Grievances commonly relate to cultural heritage matters, proximity to mining activities, and access to employment, training, procurement, and other mine-related opportunities.

A summary of grievances raised from 2023 to the audit date is as follows: Total Cases = 55; Closed = 48; Open = 7.

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

No stakeholder feedback was received by the auditors following the initial audit or prior to the surveillance audit. This does not include the specific feedback received during the Surveillance assessment.

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

Transition to Valterra Platinum

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

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

Prior to the demerger, largely in response to decreased platinum group metals (PGM) prices, Anglo American Platinum implemented cost-saving measures and improve operational efficiency. As part of this process, the company initiated a Section 189A consultation process under South African labour law, which involved negotiations with labour unions such as the National Union of Mineworkers (NUM) and United Association of South Africa (UASA). This culminated in a significant restructuring and retrenchment process in 2024, leading to approximately 3,700 jobs being affected across its South African operations, although Mototolo mine was specifically excluded from this process and did not experience a significant workforce reduction.

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

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

- Interview with Department of Mineral Resources and Energy (DMRE)
- The applicability of Free, Prior and Informed Consent (FPIC) to local communities (Chapter 2.2.)
- Implementation of the Mine Closure Plan (Requirement 2.6.1.2.)
- Verification of the implementation of corrective action plans regarding hot work risks (Requirement 3.2.4.1.)
- Communication regarding community risks associated with communicable diseases (Requirement 3.3.1.1)
- Stakeholder engagement regarding risk of exposure to HIV/AIDS (Requirement 3.3.4.2.)
- Use of public security personnel for public disturbances (Requirements 3.5.3.2., 3.5.4.2.)

3.5. Progress on Previous Corrective Actions

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

Req #	1.1.1.1.
Requirement	The operating company shall comply with all applicable host country laws in relation to the mining project.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	A compliance obligations procedure has been provided which outlines the processes in place and demonstrates compliance on a site level with applicable laws, regulations, permits, standards, codes, and other external requirements to which the Mototolo Complex subscribes through an effective compliance management culture and system that includes documents, records, and data control. The site makes use of the Isometrix software platform to track compliance across the entire business. Auditor review of this compliance management system noted examples of repeat compliance issues and overdue compliance related actions documented by the system. These suggest that the compliance management system is identifying issues but is not fully effective at managing compliance and preventing noncompliance.
Planned Corrective Action(s) from previous report	Mototolo Mine has a permit monitoring system on Isometrix. The site will continue to maintain Legal Compliance Reports. Furthermore, the site will conduct root cause analysis on repeat findings on legal compliance and develop resulting Corrective Actions using the following process: a) Root Cause Analysis - Perform in-depth root cause analyses on all repeat nonconformances and incidents to identify all contributing factors b) Trend Analysis - Analyze trend data on types of nonconformances and incidents occurring to identify patterns c) Define corrective actions - Develop specific, measurable, achievable, relevant and time-bound (SMART) preventive and corrective action plans to address identified root causes and trends - Assign responsibility and completion timelines d) Lessons Learned Sharing - Extract and share lessons learned across the organization to raise awareness on prevention

Req #	1.1.1.1.
	e) Monitoring Effectiveness - Actively monitor the completion and effectiveness of corrective and preventive actions through performance metrics and audits
Comments on Progress	Interviews and review of corrective action plan status and supporting records shows that: a) Action plans have been developed for reported gaps, including identification and mitigation of root causes. b) A suitable dashboard for all assurance activities, including existing leading and lagging indicators, is under development. c) The mine has taken several steps to ensure that action plans are specific, measurable, achievable, relevant and time-bound (SMART) Review of actions from audits and incidents from 2022-25, showed clear actions, with assigned personnel and deadlines. d) A Lessons Learned register was created for significant issues at other mines and incidents from Mototolo occurring from 2022 onward. e) The mine is tracking Isometrix actions on a daily basis and has implemented verification processes to confirm and evaluate completion. The new Valterra Action Management Governance Framework formalizes and improves the way corrective, preventive and improvement actions are managed and tracked. Amongst other requirements, the framework requires monthly performance reporting, including duplicate/repeat issues and actions, and effectiveness of closing rate Review of action trackers for Department of Mineral and Petroleum Resources (DMPR) audit in early 2025, showed an organized action tracking system, including investigation for all findings, causal analysis, and resulting action plans with assigned personnel and agreed deadlines. Repeat findings and overdue actions were fewer than noted during the previous assessment. The mine has therefore completed or is in progress with all agreed corrective actions. Verification of compliance status and in particular repeat compliance issues and overdue compliance related actions will continue during the next assessment. Meanwhile, the evidence reviewed supports maintaining the rating of Substantially Meets.

Req #	1.2.2.2.
Requirement	The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	a.) Example of Project Close out Report - NOK demonstrates how election of trustees for next of kin of Deceased Relatives were elected in great detail, COVID19 Community Response Plan presented 13 April (first case reported 5 March), SLP engagement sessions on Recruitment and Procurement/Supply Chain Community Structures open to public, with contact for enquiries provided. each SLP project outlined in presentation. However, the community representative interviewed did not feel that they received transparent and timely feedback. b.) Grievance Register demonstrates where site management allocated responsibility to address grievances according to nature of grievance. Third party appointed to develop SEP, Community Perceptions Study and to establish the CEF (not established due to ongoing community disagreements).Interviews with community stakeholders indicated that the representatives they met with from the mine did not give feedback or do anything about their grievances. c.) Meetings recorded as starting with Prayer and culturally appropriate introductions. Grievance over graves in grievance register demonstrates respectful and transparent engagement process starting with an acknowledgement letter and resolved with a legal response. Interviews with parties affected by grave relocations, however, indicated that the correct procedure for relocation and compensation was not followed, and despite engagement with DBM they have not received response or resolution they find satisfactory. d.) Community Perceptions Project being undertaken to solicits feedback from stakeholders on number of topics. Interviews with doorstep communities indicated that they are not involved in resolving

Req #	1.2.2.2.
	issues that affect them, and do not get sufficient feedback or opportunity to develop suitable procedures. e.) Presentation on SLP to community forums demonstrates how community concerns/ needs are considered and incorporated into programs. Grievance register demonstrates how grievances addressed and outcomes shared with concerned stakeholders. However, a number of communities members perceived that the grievance procedure was not beneficial, and they did not receive timely and transparent feedback from the site"
Planned Corrective Action(s) from previous report	Mototolo will continue to work on fostering two-way dialogue with stakeholders and some initiatives identified are: a) Implementation of the local accountability strategy will address two way communication between the operation and the communities b) The review and update of the grievance procedure to address the shortcomings found
Comments on Progress	The site has developed a Local Accountability Strategy to support improved engagement with external stakeholders on risk, impact mitigation, and sustainable social impact. The Social Performance Department engages with recruitment forums, impacted communities, and business forums to provide feedback to leadership. They have an annual engagement schedule developed to include all accountability structures. It was noted that there are several levels of conflict within social and political environment outside of the mine. Factors affecting engagement include: • High levels of unemployment, poverty and marginalisation, • Ineffective local government structures, including corruption and lack of resources, • Perpetual conflicts between and within local political, community and traditional leadership (often centred around power struggles for economic influence) • Multiple mining operations in one area. These aspects create a hostile engagement context and prevents meaningful engagement. While the site has shown that they have tried many different avenues to improve through internal realignment and engaging other departments in discussions, there are high levels of distrust and aggravation from external stakeholders. The key evidence considered was the feedback from most of the external stakeholders that there was not consistent two-way dialog with the site, lack of opportunities for communities and stakeholders to

Req #	1.2.2.2.
	engage with the mine site. While it is noted that the local environment is complex, there is not sufficient evidence to demonstrate that the accountability forum and grievance mechanism has created an improvement in two-way dialog. This audit therefore finds that this requirements is maintained at a rating of Substantially Meets but should be tested further during the next full (re-assessment) audit.

Req #	1.3.2.1.
Requirement	The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	Evidence provided indicates assessment of security and human right risks over a broad range (including gender-based violence, crime, contractors not adhering to government - mandated local spend and employment requirements) in the most recent Workplace Risk Assessment and Control and Layer 2 Issues-Based Risk Management (last updated 2019). Recent human rights risk identification has focused primarily on external security risks from on-going protests and road blockages. An updated Social and Human Rights Impacts and Risk Analysis based on newer group guidance (Social Way 3.0) is anticipated to be completed soon.
Planned Corrective Action(s) from previous report	Mototolo mine will review and update the Social and Human Rights Impact analysis based on Anglo Social Way 3.0 requirements
Comments on Progress	The site has an ongoing process to identify and assess potential human rights risks. This is done through two mechanisms.

Req #	1.3.2.1.
	Firstly, the ongoing use of the Social and Human Rights Impact and Risk Assessment (SHIRA) to identify and analyse Human Rights risks on an annual basis. Current SHIRA was last updated in May 2025. In addition, subject-specific SHIRAs (e.g. Tailings Storage Facilities) focus on potential human rights risks associated with specific operational areas. The site has appointed an external consultant to undertake an impact assessment for its tailings storage facility (TSF) inundation area, however, at the time of the surveillance audit, the results have not yet been integrated into the site baseline WRAC, The evidence provided supports maintaining the rating of Substantially Meets.

Req #	1.3.3.3.
Requirement	Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall: i. Cease or change the activity responsible for the impact; and ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third party mediator or another means mutually acceptable to affected rights holders; b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact; c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.

Req #	1.3.3.3.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	Initial Assessment: The site has conducted some human rights impact and risk analyses. The site has developed and implemented a Contractor Management Procedure and a Responsible Sourcing Standard for Suppliers. The site monitors Contractor compliance with contract terms through a human rights compliance checklist. However, on-site worker interviews indicated a differential between full-time employees of the operating company and contractors employed at the mine through its Business Partners. Contracted workers expressed an unwillingness to lodge grievances with respect to their working conditions or environment with their Business Partner employer because of anticipated non-action. Contract workers also cited the unidentified human rights risk of an inability to freely associate. A Grievance Report (Jan to May 2022) provided indicates that the grievance procedure is used by workers but does not provide a means to determine if employees and contracted workers use the procedure in equal proportion. The follow-up assessment indicated that there are still obvious disparities between Anglo American employees and contractor workers. - Conditions of employment: Contracted workers are not permanent full-time employees of the operating company and therefore may earn a lower wage and work under lower minimum standards of employment as per legal requirements (Basic Conditions of Employment Act) and not receive the full range of benefits afforded to Anglo American employees). - Grievances: The culture of inequality between Anglo American employees and contractor workers remains and includes poorer access to remedies by contractors. This is due to a persistent distrust in, and lack of response from, the grievance processes. In theory contractors allow staff to raise grievances through the provided means. The reality (according to at least three interviewees), is that grievances are not taken seriously (i.e., no response or feedback is given), actively ignored and /or not reported through formal means. There have been steps taken to ensure due diligence is carried out in terms of the supply chain. Including: 1) Contractor Social Management strategy aims to ensure that contractors are implementing social safeguards within their contracts and within the community. 2) Responsible Sourcing Standard for suppliers – which aims to ensure suppliers comply with all relevant laws, industry regulations, the organization's policies, site requirements and supply conditions.

Req #	1.3.3.3.
	3) SAP Fieldglass - This is an online system that assists contractors and service providers with onboarding and tracking against the contractor's requirements. Other initiatives - "Culture in Action" is another initiative being put in place. This identified Human Rights influencers, who regularly go out into the operations and engage with workers and contractors to identify any potential issues and to spread the culture of safety, equality, and fairness within the works force. This started late in 2022. - Living with Dignity Hub provides support to the workforce in dealing with gender-based violence (GBV), sexual harassment, bullying, victimization, harassment, and domestic violence. The above initiatives seem to be on the right path towards managing some of the disparities between Anglo American and contractor employees. It will, however, take a long time to change the culture of the operations, as this is a social context of South Africa. One of the issues identified was that contractor workers do not have the same access to the larger unions who work directly with Anglo American. As a result, contractor employees join smaller unions that are not as effective as the larger unions. The freedom of association is present; however, the effectiveness is not the same between Anglo American and contractor employees. A Human Rights Impact Assessment was conducted (Synergy, 19 May 2023). The Human Rights Impact Assessment found that there were six salient human rights impacts from the operations: two impacts are being directly caused by the operations, two impacts are being contributed to, and one is directly linked. Impacts identified in the assessment were broadly categorized into worker rights, gender-based violence, bullying, harassment and intimidation, distrust in access to remedy, impacts related to supply chain management (including unfair and unequal labor practices), and health.
Planned Corrective Action(s) from previous report	As part of the optional Corrective Action period Mototolo mine did a Human Rights Due Diligence Study. Site will focus on implementing the Grievance Process for all contractors.
Comments on Progress	In addition to the Human Rights Due Diligence (HRDD) study, the mine conducted a grievance process survey with stakeholders. Significant process updates reviewed during the assessment included: • Timelines for grievance response and follow-up, with tracking.

Req #	1.3.3.3.
	• Evidence for multiple workshops and public communications, providing details of the available grievance mechanisms to community stakeholders. • Reporting to senior site and corporate officers on a monthly basis. • Communicated to contractors that the Valterra process is available to them, including access to the Living with Dignity hub. The updated process was re-branded as part of moving from Anglo American to Valterra. It is aligned with UN Guiding Principles, and this is referenced in the procedure, but the mine did not document a mapping against those principles. No direct feedback from stakeholders had been received at the time of assessment. There is no direct oversight of contractor processes to ensure they are in place, utilized, or whether grievances are appropriately managed by contractors. Overall, the mine has seen an increase in the number of reported grievances year-over year, due to improved awareness and the mine no longer screening out any reported grievances. In addition, the mine has increased the awareness of bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers and contractors on right to freedom of association. This was confirmed through worker interview, as most respondents were aware of their rights and had not encountered sexual harassment in the workplace. However, some victimization and bullying within contractors and employees from supervisors towards teams was reported. The evidence provided supports maintaining the rating of Substantially Meets, as reports of victimization and harassment are ongoing. The implementation of these measures will be reconsidered at the next full (renewal) audit.

Req #	1.4.1.1.
Requirement	The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.
Critical	Yes

Req #	1.4.1.1.
Rating from previous report	Substantially Meets
Justification from previous report	An appropriate grievance mechanism is in place and is accessible to internal and external stakeholders. Access is through multiple routes, namely phone call, email, post, online (Anglo anonymous hotline), SMS, WhatsApp and in-person (one-on-one or group meetings). The process is distributed in English and Sepedi and communicated at community and stakeholder meetings. An Incident management procedure is in place (V2 October 2019) with mechanisms to raise grievances and seek resolution. This has been communicated to stakeholders through training and publication in Sepedi and English in the Platinum Times and handed out as pamphlets. Engagement with workers and external stakeholders indicated that there was little knowledge of or easy access to the grievance procedure. The general perception was that either their grievances would not be taken seriously, or they would be targeted for raising grievances. No documentation of training of relevant personnel on the grievance mechanism. No documentation of any survey or review was carried out to evaluate the effectiveness of the grievance mechanism
Planned Corrective Action(s) from previous report	Next steps identified are: a) The review and update of the grievance procedure to address the shortcomings found. b) An external context review to understand the effectiveness of the Grievance procedure.
Comments on Progress	The mine conducted a grievance process survey with stakeholders and used the data to guide process improvements. The updated and rebranded process, dated September 2025, included specific timelines for response and follow-up, with tracking, and also ensures that external-facing processes such as regulators and non-governmental organizations (NGOs) are not excluded. There has been no direct feedback on the updated process from stakeholders yet. Significant progress has been made, but the revised process has not been in place long enough to fully evaluate its effectiveness. This was evident in interviews with external stakeholders, as they were not aware of grievance mechanisms, or felt they could not use the mechanisms to get sufficient feedback from the mine site. Therefore, sufficient opportunities remain, and the rating for this requirement is unchanged at “Substantially Meets”.

Req #	2.5.1.1.
Requirement	All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	Evidence presented confirms that Mototolo Complex has a sophisticated approach to development of emergency preparedness plans that meet many but not all the requirements of the UN Awareness and Preparedness for Emergencies at the Local Level for Mining. A plan is underway to revise any of the related plans and communicate them to relevant stakeholders to meet all Awareness and Preparedness for Emergencies at the local level requirements. Specific gaps are related to helicopter landing pad (managed by Corp aviation department) Contract with Netcare 911; and media communication - which is managed through Anglo American Platinum media relations department. Site Observations: On-site observations and interviews confirmed that emergency response plans were implemented at the mine. There were indications that communication to community groups could be better - although community members reportedly seemed to be more interested in other day-to-day concerns.
Planned Corrective Action(s) from previous report	Further work will be done to revise and update emergency preparedness plan, and this will include : a) The establishment of the Emergency Preparedness and Response Plan (EPRP) committees with doorstep communities b) Stakeholder engagement plan communication for EPRP meetings.
Comments on Progress	Since the previous assessment, Mototolo Platinum Mine significantly revised its emergency management plan, incorporating stakeholder input through a structured mapping process. Even though no formal documentation confirming full alignment with UN APELL was provided, the updates addressed gaps identified in the IRMA assessment and were informed by UN APELL principles. Review of the updated plan, related programs (community engagement and Tailings Storage Facility (TSF) management), and interviews with responsible personnel indicated improved integration and consistent understanding of emergency procedures across departments. Overall, the revisions

Req #	2.5.1.1.
	demonstrate substantial progress in emergency preparedness, though opportunities remain for formal compliance verification. The evidence supports revising the rating for this requirement to Fully Meets.

Req #	2.5.2.1.
Requirement	The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	Evidence presented confirms that Mototolo Complex has scheduled emergency response workshops with doorstep communities in Quarter 2 of 2021. Awareness campaigns have already started. Update at Stage 2. Completed initial workshops with all potentially affected communities. Followed up with awareness sessions. Site Observations: On-site observations and interviews confirmed that various interested parties had been contacted for input as part of the development of emergency response plans. Evidence of strong community engagement was lacking but it was noted that local communities frequently failed to respond to topics, such as this, that were not of immediate concern to them.
Planned Corrective Action(s) from previous report	a) The establishment of the EPRP committees with doorstep communities b) Stakeholder engagement plan communication for EPRP meetings. c) Scheduled quarterly EPRP Meetings

Req #	2.5.2.1.
Comments on Progress	Since the last assessment, Mototolo Platinum Mine revised its Emergency Management Plan (EMP), incorporating input from stakeholders including neighbouring communities and local authorities. The process began with stakeholder mapping, and mine representatives stated that updates addressed gaps identified in the IRMA assessment and were informed by UN APELL principles. Engagement during plan development reportedly included local communities, Didingwe River Lodge, and Leshaba Community, but independent confirmation of stakeholder involvement or feedback was not reviewed. A notable emergency drill (a simulated Mareesburg Tailings Storage Facility (TSF) failure) was conducted in Q4 2024, involving over 80 participants from local communities and authorities (including police), and lessons learned were documented. Overall, the revision and drill indicate progress in emergency preparedness, but gaps remain in documented stakeholder confirmation, and evidence of ongoing governance structures. While stakeholder involvement was confirmed by mine personnel, independent evidence of engagement or feedback was not reviewed due to the scope of the surveillance audit and insufficient time. This will be followed up on at the next full audit. The evidence provided supports maintaining the rating of Substantially Meets.

Req #	2.6.2.1.
Requirement	Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	Prior to the mine being acquired by Anglo American Platinum, the required rehabilitation and closure plans were compiled and submitted in accordance with the relevant legislation at the time. These have since been revised/updated accordingly (in line with the required legislation – National Environmental Management Act Financial Provisioning

Req #	2.6.2.1.
	Regulations).Like the closure cost liability assessment, the update of the Mine Closure Plan for Mototolo complex is underway.
Planned Corrective Action(s) from previous report	We are working to finalize the closure cost liability assessment and the mine closure plan for Mototolo Complex in our efforts to prioritize the protection of human health and environment post mining end use, the next steps identified are: a) Closure Cost Liability Completion b) Closure Plan completion c) Submission of relevant Closure Cost documents to Regulatory Bodies
Comments on Progress	The mine completed the closure plan and closure cost liability assessment for Mototolo and submitted them to regulators ahead of the August 2024 action due date. The process requires annual review/update to the closure plan and projected closure costing. At the time of the IRMA surveillance assessment, the 2024 plan was completed and submitted, and the 2025 plan was in draft form. During reviews, mine personnel confirmed that the closure plan is dynamic and could be updated more frequently if changes dictate. The evidence supports revising the rating for this requirement to Fully Meets.

Req #	3.1.2.1.
Requirement	The operating company shall respect the rights of workers to freedom of association and collective bargaining.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	Recognition and wage agreements were provided. On-site interviews with union representatives and workers confirm the operating company's respect for worker's rights to freedom of association and collective bargaining.

	However, interviews with contracted workers employed by Business Partners indicate unionization is discouraged.
Planned Corrective Action(s) from previous report	Mototolo Mine respects the rights of workers to freedom of association and collective bargaining. The next steps identified include: a) Create awareness on contractors employees human rights on the freedom of belonging to Unions. b) Create awareness on contractors employees to various platforms where complaints can be lodged.
Comments on Progress	The site has increased awareness and training for workers and contractors on right to freedom of association. This was confirmed through worker interviews, as most respondents (and specifically contractors) were aware of their rights to join a union, and had free choice to do so. The evidence supports revising the rating for this requirement to Fully Meets.

Req #	**3.1.3.3.**
Requirement	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	Clear evidence provided of policy and training to prevent or address discrimination, bullying and harassment, and gender-based violence has been developed and implemented. Harassment focused on female workers or sexual in nature was not suggested in the conducted interviews.
Planned Corrective Action(s) from previous report	Mototolo has since implemented a Living with dignity program to continue in our efforts to better understand the root causes of prejudice. This will be coupled with continuation of culture in action work and bullying, harassment and victimization training
Comments on Progress	The site has increased the awareness of bullying, harassment and victimization and anti-gender-based violence campaigns and training

	for workers and contractors. The site has also put additional focus on the inclusion of contractor workers across key aspects of their human rights management, including induction and awareness around gender-based violence and sexual harassment, and Social and Human Rights Impact and Risk Assessment. This was confirmed through worker interviews, as most respondents were aware of their rights and had not encountered gender-based violence or harassment in the workplace. However, some victimisation and bullying was reported, specifically contractors. The evidence provided supports the rating of Substantially Meets.

Req #	3.1.5.1.
Requirement	The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum: a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution; b. Shall allow for anonymous complaints to be raised and addressed; c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	The operating company has a grievance procedure for workers in place, accessible on numerous platforms, including anonymously. On-site interviews confirm that grievances made by employees to the operating company are addressed at an appropriate level of management and in a timely manner. Workers and union representatives confirm that the grievance procedure allows workers to be represented. During interviews with workers and union representatives, there was no indication that the operating company had impeded other judicial or administrative authorities. The Contractor Management Procedure is intended to place employees and contractors on a level playing field with respect to grievances

Req #	3.1.5.1.
	related to environmental, health and safety issues. On-site interviews, however, indicates contracted workers are reluctant to lodge grievances with their business partner employers or the operating company.
Planned Corrective Action(s) from previous report	Mototolo Mine has a grievance procedure in place, and we will continue working on increasing confidence in the mechanisms in place for all workers and business partners. Further work to create awareness on contractors employees to various platforms where complaints can be lodged will be done
Comments on Progress	The grievance mechanisms are still in place, and the site has made ongoing efforts to create awareness around grievance mechanisms for workers and contractors. However, the worker interviews indicated that there is still some reluctance to formally raise grievances about superiors (e.g. supervisors), as this could lead to victimisation. In addition, mechanisms for raising anonymous grievances are still not widely known or trusted by workers, and especially contract workers as they feel "outside" of the mine's systems and not protected. The mine communicates to contractors that the Valterra process is available to them, including via the Living with Dignity hub. However, the mine has no direct oversight of contractor processes to ensure they are in place, utilized, or whether grievances are appropriately managed by contractors. The evidence provided supports the rating of Substantially Meets.

Req #	3.2.4.1.
Requirement	The operating company shall implement measures to protect the safety and health of workers including: a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;

Req #	3.2.4.1.
	d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.
Critical	Yes (a and b)
Rating from previous report	Substantially Meets
Justification from previous report	Evidence provided, and site visits confirmed that the mine has implemented numerous measures to protect the safety and health of workers, including the individual requirements of these criteria. However, during the assessment some poor/unsafe conditions and execution of work tasks related to hot work were not properly controlled. This appeared to be due to lack of risk awareness. Incomplete or missing task-based risk assessments were contributing to this. The site provided several high-level risk assessment documents that included some hot work risks, but the identified task/steps/exposures did not cover the situations observed. Secondly, there was no mention of cutting/grinding or welding near flammable or combustible materials (other than rubber-lined pipes, conveyors, or empty tanks). There was no mention of using a fire watch, no mention of cutting/grinding or welding on or near mobile equipment, and no mention of expectations for cylinder valve management, pressure limitations, oxygen cleanliness, etc. In general, 'Stop, Look, Assess, and Manage' reports were being completed but not used as intended - repeating existing or common/normal controls rather than focusing on unusual hazards or changes. (Note that the 'Stop, Look, Assess, and Manage' is the only task-based risk management tool available for tasks that do not have job risk assessments.) May 2023: In the site's Corrective Action Plan, they stated that job risk assessments are being developed for high-risk work. Fire and hot work are related to several high-risk jobs. A consultant is appointed to update job risk assessments. Also, communication and awareness related to the use of 'Stop, Look, Assess, and Manage' and the mind jogger completion would be rolled out at operational safety, health & environment meetings with supervisors. On-site: The site had developed and provided evidence of updated risk assessments and job risk assessments being in place, but observations

Req #	3.2.4.1.
	and interviews showed that the revised templates were not rolled out across the entire mining complex. At the time of the audit, individuals that were tasked with completing risk assessments had not yet undergone the required training. The assessor was unable to visit other areas where similar activities or risks were present and could not therefore confirm that corrective actions had been broadly applied. Feedback provided post-audit – 3 July 2023, indicated that 34 out of 35 employees have completed the hot work training. The 35th employee had left the mine and was not required to complete the training. Nov 2023 – Corrective action plan review. The site has provided evidence to demonstrate the progress of the initial corrective actions to isolate and progress corrective actions following site investigations. Further independent verification of the implemented measures of the corrective action plan will be included in the first surveillance audit.
Planned Corrective Action(s) from previous report	Implemented measures to be verified with verification audit. Protection of the health and safety of our 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
Comments on Progress	Evidence (including hot-work related procedures, training records and examples of hot work permits) shows significant improvement since the initial audit. Updated hot work procedures now require permits, 'Stop, Look, Assess, and Manage' (SLAM) risk assessments, fire watch, and strict controls such as watering down work areas, removing combustibles, and using suppression systems. Underground work includes gas detection. Revised Job Risk Assessments (JRAs) for welding, cutting, and gouging were reviewed and found appropriate, addressing previously missing controls. Training was completed for 34 of 35 employees, and SLAM compliance reached 99% with 96% confirming fatal risk controls. No repeat hot work deficiencies were observed, and workers interviewed demonstrated awareness of new requirements. Corrective Action Plan actions were verified through document reviews, interviews, and compliance data, covering risk mitigation, governance updates, training, supervision, and monitoring. Additional improvements include sanitation upgrades and safety culture initiatives such as the “Keep It Safe for My Family” campaign.

Req #	3.2.4.1.
	New concerns noted during the surveillance audit (see Section 4.3.) pointed to the need for continued review of safety processes, communication of risks and controls to affected workers, and verification of effectiveness. Consequently, the rating of Substantially Meets is still considered appropriate for this critical requirement.

Req #	3.3.1.1.
Requirement	The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered: a. General mining operations; b. Operation of mine-related equipment or vehicles on public roads; c. Operational accidents; d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1); e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6) f. Mining-related effects on community demographics, including in-migration of mine workers and others; g. Mining-related impacts on availability of services; h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities did not include all the requirements; however, elements are included in other supporting documents.

Req #	3.3.1.1.
	The provided Investment Development Model (IDM) and Social Way Assurance Framework confirmed that community and sensitive receptors were identified as part of stakeholder impact management plans. Risks relating to sub-requirements a, b, c, f, g, and h have been scoped. Risks and impacts to community relating to d, e, and i are identified and scoped in separate programs. Failure of structural elements such as tailings dams, is scoped through Anglo's technical programs addressing dam safety. Sub-requirement e is addressed, as Priority Ecosystems Baseline surveys were undertaken by an external specialist in 2021. Following on from this, community engagement sessions were held with the specialists from Scientific Aquatic Services. Sub-requirements d and e are included in emergency planning and biodiversity assessments. For sub-requirement i, the Social Way Toolkit explains how the mine engages with local health authorities on public health programs that include the risks associated with communicable diseases, so there is clearly an understanding of their intent and extent. The communication of these risks to the respective communities have not been fully completed and further reviews will be undertaken during surveillance to assess where gaps may exist in the awareness and training programmes.
Planned Corrective Action(s) from previous report	As part of community health and safety, Mototolo mine will review and update the Social and Human Rights Impact analysis based on Anglo Social Way 3.0 requirements
Comments on Progress	The mine completed their review and update of relevant Social and Human Rights Impact Analysis (SHIRA) analyses in July 2025. Communication of significant potential risks and impacts to communities was the main gap identified at the initial audit. Since the initial IRMA Stage 2 assessment, the mine invested effort in community health and safety engagement, primarily as part of the Global Industry Standard on Tailings Management (GISTM) program. Evidence of engagements reviewed during the surveillance assessment included communication materials and meeting plans, etc., for several local communities, various local leadership such as Ward Councillors, Tribal Leaders, etc. The mine have visited local facilities, and worked further downstream than initial outreach (based on Extended Inundation Zone concept suggested by Tailings Committee), etc. The mine indicated they plan to bring local Ward Councillors to visit Tailings Storage Facilities (TSFs) to ensure understanding of structure, management processes and failure mechanisms. For directly impacted communities, remotely activated sirens have been installed. Risks related to health impacts were well understood and no significant changes were made as part of the review. The mines programs to

Req #	3.3.1.1.
	identify communicable diseases in local communities and develop related support/mitigation programs have continued to provide awareness and education on communicable diseases. This is acknowledged to be an ongoing challenge. Stakeholder interviews acknowledged efforts the mine is supporting in nearby communities. The evidence reviewed during the assessment supports an upgraded rating of Fully Meets.

Req #	4.1.5.1.
Requirement	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The Design Report for the recently designed and constructed Mareesburg Tailings Storage Facility was based on best available technologies (e.g., for Mareesburg Tailings Storage Facility liner systems applied). Additional innovations were also applied in the development of an impermeable layer below the liner, with low friction resistance so stability bands were applied in the basin to provide resistance to sliding. Different assessments were undertaken including 3D seepage assessments, dynamic deformation modelling, seismic assessments etc. to mitigate potential liquefaction triggered by a seismic event - Based on international best practices. Also, fiber optic cables are understood to be installed to monitor strains and leakage through the liner via temperature differences. The site has conducted a gap assessment against the Global Industry Standards on Tailing Management guidelines and has developed a timeline for the implementation of Global Industry Standards of Tailing Manager guideline improvements. Additional innovations were also applied in the development of an impermeable layer below the liner, with low friction resistance, so stability bands were applied in the basin to provide resistance to sliding. Different assessments were undertaken including 3D seepage assessments, dynamic deformation modelling, seismic assessments, etc., to mitigate potential liquefaction triggered by a seismic event. This was based on international best practices. Also, fiber optic cables are understood to be installed to monitor strains and leakage through the liner via temperature differences. The site has conducted a gap

Req #	4.1.5.1.
	assessment against the Global Industry Standard on Tailings Management guidelines and has developed a timeline for the implementation of the Global Industry Standard on Tailing Management guideline improvements. Aside from tailings-related waste facilities, onsite tours of other mine waste facilities, including salvage yards, workshop areas, etc., identified practices not considered to be best available/applicable. Infrastructure for the containment and collection of hydrocarbon waste is not considered best practice to prevent contamination of the surrounding environment.
Planned Corrective Action(s) from previous report	Tailing waste facilities at Mototolo mine have been developed using best practices. Mototolo mine will work on the following: a) Hydrocarbon Management procedure to be amended to address the finding. b) Increased frequency of internal audit and inspections.
Comments on Progress	The initial finding highlighted that while the Mareesburg Tailings Storage Facility (TSF) design applied Best Available Technologies (BAT) and advanced monitoring systems, other mine waste facilities (e.g., salvage yards, hydrocarbon containment areas) did not meet best practice standards. The Corrective Action Plan (CAP) proposed amendments to the Hydrocarbon Management procedure and increased audit frequency, but these actions did not fully align with the original finding regarding broader non-TSF waste facilities. Verification during the surveillance audit confirms that the Hydrocarbon Management procedure has been updated and internal audits are now conducted biannually, with the last audit completed in September 2025 (no major findings reported). However, the mine has not provided comprehensive evidence of actions taken to ensure non-TSF waste facilities are aligned with BAT/Best Available Practices (BAP) beyond hydrocarbon containment improvements (e.g., oil separators installed at workshops). No structured plan for salvage yard or other waste facility upgrades was presented. The evidence reviewed during the assessment supports a continued rating of Substantially Meets.

Req #	4.2.4.1.
Requirement	The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:

Req #	4.2.4.1.
	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 nonmining entities; e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables.
Critical	Yes (a through e)
Rating from previous report	Substantially meets
Justification from previous report	The site has established the "Mototolo Complex Water Sampling, Monitoring and Reporting Procedure v9.0." Appendix A Monitoring Locations includes locations of monitoring boreholes, water supply boreholes, surface water, dirty water dams, an oil storage facility, hydrocarbon monitoring locations, equipped boreholes, dikes, and ephemeral drainages. The monitoring and sampling program is implemented by a contractor who completes the required sampling and reporting, including quarterly reports supported by accredited lab analysis. During the on-site assessment, the site had completed and was in the process of approving the Trigger Action Response Plan (TARP) that includes the values in the IRMA Water Quality Criteria by End-Use. Formal approval and adoption of the water quality Trigger Action Response Plan (TARP) is still pending, along with evidence of the effective implementation of the Trigger Action Response Plan. The site will also be requiring lab analysis to report on sampling results against the IRMA Water Quality Criteria by End-Use.

Req #	4.2.4.1.
Planned Corrective Action(s) from previous report	a) TARP to be aligned with the new Group Water Monitoring guideline and to be reviewed by Group Legal. b) Annual review of the effectiveness of the identified triggers to provide early warning.
Comments on Progress	In June 2025, the mine implemented an approved and revised (Valterra branded) Adaptive Water Management Plan (AWMP), containing Trigger Action Response Plans (TARPs), aligned with the latest (September 2023) Water Use License, IRMA water quality criteria and relevant Group standards. The AWMP also includes a review schedule, with assigned responsibilities. The review schedule is not contained within the AWMP, but an annual review of the triggers is scheduled in the mine's compliance management system. The AWMP also referenced the related water sampling, monitoring and reporting procedure, which requires analysis of all relevant parameters included in the TARP. The evidence reviewed during the assessment supports a revised rating of Fully Meets.

Req #	4.2.4.4.
Requirement	The operating company shall develop and implement an adaptive management plan for water that: a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.
Critical	Yes
Rating from previous report	Substantially Meets

Req #	4.2.4.4.
Justification from previous report	The 2020 Water Management Plan (WMP) outlines actions to be taken by the site on a yearly basis to mitigate water risks in the context of identified and predicted deficits underpinned by flow modelling to simulate groundwater flow/discharge volumes into the mine workings over the life of mine. The Water Management Plan does not specify adapt management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, but does refer to applying adaptive management when required based on continuous monitoring of rainfall and evaporation and five yearly statistical analyses to track observed trends and variance in these. The mine has developed the "Water Adaptive Management Plan." During the Stage 2 on-site assessment in May 2022, this document was in draft and not yet approved by the site for use. Trigger response actions and adaptive management are outlined in the plan and work in conjunction with the "Anglo American Platinum 2022 Operating Framework and Recommended Implementation Measures." In addition to proposed water use license limits, trigger limits also include IRMA Water Quality Criteria. Triggers and actions are established based on green, yellow, orange, and red levels, indicating the level of severity and corresponding action required based on the severity of the trigger level. Timelines for action completion were not indicated in the plan document. The Water Adaptive Management Plan has been developed as of May 2023.
Planned Corrective Action(s) from previous report	Next steps are : a) Annual review of the effectiveness of the water management measures in preventing negative changes in the water characteristics. b) Investigation of methods or technologies to improve the effectiveness of water management measures.
Comments on Progress	In June 2025, the mine implemented an approved and revised (Valterra branded) Adaptive Water Management Plan (AWMP), containing Trigger Action Response Plans (TARPs), aligned with the latest (September 2023) Water Use License, IRMA water quality criteria and relevant Group standards. The AWMP also referenced related operating procedures, water sampling, monitoring and reporting procedures, and incident management procedures. The AWMP also includes a review schedule, with assigned responsibilities. The review schedule is not contained within the AWMP, but an annual review of the triggers is scheduled in the mine's compliance management system.

Req #	4.2.4.4.
	Actions listed relevant to the various trigger levels still do not indicate timelines for completion. In support of and alignment with the AWMP, the site also updated site wide water management responsibility assignment matrix (RACI) in 2025, and the Site-wide water balance update and recalibration was completed in December 2024. The evidence reviewed during the assessment supports a continued rating of Substantially Meets

Req #	4.3.2.1.
Requirement	If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The mine stated that the Air Quality Management Plans for the concentrator and Tailings Storage Facility were developed. At the time of Stage 2, the Request for Qualification process had commenced to appoint an appropriate consultant to establish a complex Air Quality Management Plan The '46986-Mototolo Joint Venture Concentrator Air Quality Management Plan' (developed by an external consultant) applies to the concentrator only and is dated 2016 so may now be out of date. There is also an Air Quality Management Plan for Der Brochen Scope of Work (not rated). During the future site visit, further information can be checked including the aspects register, monitoring plan and any updated Air Quality Management Plan. The Anglo American Air Standard requires that 'the Air Quality Management Plan shall clearly define the site's air quality control strategy and objectives, timeframes for implementation of controls, resources available to achieve objectives, and the communication process with interested parties. The evidence provided (Air Quality Management Plan for the Concentrator) does not achieve this and it is not known if there is a separate, more detailed plan based on the Air Quality Management Plan
Planned Corrective Action(s) from previous report	We expect to update Air Quality Management plan and review the implementation progress to ensure adverse impacts on air quality are minimized
Comments on Progress	The Air Quality Management Plan (AQMP) was updated and integrated into a comprehensive Air Quality Monitoring Program (AQMPr) finalized in July 2025 by a third party consultant. The revised program meets the requirements of 4.3.2.1, addressing gaps noted in the previous audit by defining site-specific strategies, objectives, timeframes, and communication processes. It aligns with National Environmental Management: Air Quality Act (NEM:AQA), National Ambient Air Quality Standards (NAAQS), and international best practice under IRMA and IFC standards. Implementation progress was verified through document reviews and site observations. Key improvements include passive sampling for NO_2,

Req #	4.3.2.1.
	SO_2, ozone, and VOCs, dust fallout monitoring at 36 locations, and real-time monitoring using advanced AQMS and Polludrone units at five sites. Calibration and maintenance schedules are documented, and compliance thresholds follow NAAQS and World Health Organization (WHO) guidelines. 'Stop, Look, Assess, and Manage' (SLAM)-style verification for air monitoring tasks and grievance mechanisms for community concerns were also confirmed. Stakeholder engagement records show consultation during equipment placement and awareness workshops with local communities and authorities. The evidence reviewed during the assessment supports a revised rating of Fully Meets.

Req #	4.5.1.1.
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The Anglo American Energy and Greenhouse Gas Emissions Management Guidelines is not a policy document but the corporate Anglo Climate Change Policy, not referenced by the Mine as evidence against this clause, does meet the overall requirement and has a 3-year validity. The Policy applies to the entire Anglo American plc group, including all its Business Units, Group Functions, and controlled subsidiaries, regardless of region or operation.

Req #	4.5.1.1.
	Group target of carbon neutrality by 2040. Eight select mines globally are expected to be carbon neutral by the target date. Mototolo may or may not be one of those sites. Every operation must have projects and initiatives to reduce greenhouse gas emissions. Annual targets for each mine are defined by converting total energy consumption into gigajoule and emissions in tonnes CO2e. Baseline for 2016 minus a year-over-year improvement normalized against intensity.
Planned Corrective Action(s) from previous report	Mototolo mine was part of the Anglo American PGMs business and we have developed comprehensive decarbonization plans such as Envusa Energy at a group level that are in various stages of implementation. While our targets are at a group level, the benefits will count towards site performance. In addition, focus on reduced energy consumption at a site level and initiatives to reduce GHG emissions are ongoing
Comments on Progress	The initial Audit gap was that the corporate Climate Change Policy existed but was not applied at site level; Mototolo lacked a structured plan and targets. This has now been addressed. The mine developed a Greenhouse Gases (GHG) Emissions Reduction Action Plan, set short-, medium-, and long-term targets, and initiated projects such as conveyor optimization, compressed air upgrades, and power monitoring software rollout. Quarterly reporting and annual reviews are planned, though October data shows a minor reporting gap. The evidence reviewed during the assessment supports a revised rating of Fully Meets.

Req #	4.6.4.1.
Requirement	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; 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;

Req #	4.6.4.1.
	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.
Critical	Yes
Rating from previous report	Substantially meets
Justification from previous report	Mototolo is an existing mine. There are multiple studies and assessments that were in progress (as at Stage 2) as well as in the process of being finalized. Following completion of the Biodiversity Baseline Assessment, Significant Biodiversity Features, and Priority Ecosystem Services assessment, a Biodiversity Risk Assessment will be compiled. Following the Risk Assessment, a Loss / Gain Calculation will be done, establishment of biodiversity management plans as well as biomonitoring that is aligned to the risk assessment will be initiated
Planned Corrective Action(s) from previous report	The focus will be on: a) Biodiversity Baseline, Significant Biodiversity Features and priority Ecosystem Services Assessment report completion. b) Impact report and Risk assessment completion. c) eDNA sampling completion.
Comments on Progress	A detailed baseline assessment for the entire area was completed, in line with planned actions. The impact report, risk assessment and eDNA sampling was completed in 2024. The mine re-developed the biodiversity strategy following the Anglo American divestiture, to focus on relevant topics for Valterra. The updated strategy continues to meet IRMA requirements and requires an update to the biodiversity impact and conservation assessment every 2 years. The mine is committed to a net-positive impact philosophy. Annual reports show that the mine is tracking this and other biodiversity metrics. The evidence reviewed during the assessment supports a revised rating of Fully Meets.

3.6. Notable Performance Improvements

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

- The mine has made notable enhancements to the processes for receiving, responding to, and tracking grievances.
- Ongoing stakeholder engagement through restructured forums and procedures.

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

- Enhanced emergency preparedness by introducing new underground emergency vehicles, improving response capability and worker safety in high-risk areas. Technology integration to strengthen emergency response.

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

- Overall health and safety performance, supported by high 'Stop, Look, Assess, and Manage' (SLAM) compliance, robust hot work controls, proactive safety campaigns, and continuous improvement initiatives.
- Identification of communicable diseases in local communities, and support/mitigation programs.
- Good awareness across employees and contractors of Gender-based violence (GBV) and health & safety

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

- Significant updates and improvements to water management programs. Dashboard to track water conservation performance.
- The Air Quality Monitoring Program is aligned with international standards, and features real-time monitoring, expanded coverage, and stakeholder consultation.

3.7. Concerns Related to Continued Maintenance of Achievement Level

Evidence gathered during interviews and discussions with workers during both the initial IRMA audits and the surveillance pointed to concerns related to continued harassment and intimidation of workers, especially contractors. Critical requirements related to these issues (primarily 3.1.3.3.) have not been re-rated at this time as this was an ongoing issue and there was no evidence of performance deterioration.

All related requirements will be fully re-evaluated at the renewal audit (anticipated in 2027) and if the concerns remain unchanged, then there is a possibility of re-rating performance downwards. This could impact the mine's overall achievement level.

4. General Performance by IRMA Standard Principle and Chapter

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

4.1. Principle 1: Business Integrity

During the previous audit, this principle received an overall score of 77%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

4.1.1. Chapter 1.1—Legal Compliance

Chapter 1.1. was fully audited during the surveillance audit.

Interviews and review of corrective action plan status and supporting records shows that:

The new Valterra Action Management Governance Framework formalizes and improves the way corrective, preventive and improvement actions are managed and tracked. Amongst other requirements, the framework requires monthly performance reporting, including duplicate/repeat issues and actions, and closing rates.

Review of action trackers for Department of Mineral and Petroleum Resources (DMPR) audit in early 2025 showed an organized action tracking system, including investigation for all findings, causal analysis, and resulting action plans with assigned personnel and agreed deadlines. Repeat findings and overdue actions were fewer than during previous assessment.

The mine has therefore completed or is in progress on all agreed corrective actions. Verification of compliance status and in particular repeat compliance issues and overdue compliance related actions will continue during the next assessment.

A Lessons Learned register was created for significant issues at other mines and incidents from Mototolo occurring from 2022 onward.

The mine continues to use existing dashboards at high-level and site level for permit-related performance. Within these, it is possible to drill down by permit type to see individual permits. The mine employs a 5x5 criticality evaluation tool to prioritize compliance items. The dashboard also flags overdue permit actions/conditions. Note: 110 past 90 days.

There is a 3-year audit by a contracted 3rd-party, covering national and provincial legislation as well as permits. Permits include licenses, which address compliance with relevant legislation as permit requirements. There are also a range of other internal and external audits/inspections for a range of specific technical areas, such as radiation safety, environmental performance, etc.

Compliance with ISO, IRMA and Valterra Technical Standards requirements is managed through assurance department, internal audits and external audits. Communication of IRMA requirements to workers has continued to take place on an individual basis via inclusion in orientation-type training. Requirements are integrated into governance documentation.

An alert system for legislative changes is provided via an external law service. This triggers a monthly legislative Management of Change (MoC) with relevant subject matter experts to evaluate applicability or implementation.

Via Isometrix, the mine also continues to monitor many 3rd-party permit requirements (contractors). The Contractor Management Department specifies basic expectations such as "Letter of Good Standing" from the Labour Department, insurance requirements, and required certifications.

Checking contractor compliance to labour laws and human rights was observed to be partly covered through various supplier/contracting processes, including follow-up on reported grievances. Compliance monitoring of 3rd-parties has taken place since the initial audit, including audits, and development/tracking of corrective actions. This area was improved, with considerable additional focus following the initial IRMA audit.

4.1.2. Chapter 1.2—Community and Stakeholder Engagement

Chapter 1.2 was partially reviewed during the surveillance audit, with a focus on four requirements, including critical requirement 1.2.2.2 which did not achieve a Fully Meets rating during the initial audit. Progress on critical requirement 1.2.2.2 is detailed in Section 3.5.

The surveillance audit identified several changes intended to strengthen stakeholder engagement processes. These included implementation of a Stakeholder Engagement Plan, establishment of stakeholder-specific engagement forums, development of a standardized Engagement Protocol and Rules of Engagement, and continued efforts to improve coordination between stakeholder engagement, human resources, and other relevant site functions. Evidence reviewed during the assessment indicated that these systems and processes have been established and are being implemented.

The audit also reviewed the site's engagement approach relating to community members, local business forums, recruitment forums, local government representatives, and other stakeholder groups. Documentation reviewed demonstrated ongoing engagement activities and efforts to communicate information related to employment, procurement, community development initiatives, operational changes, and other matters relevant to stakeholders. The site has also undertaken communication regarding the transition from Anglo American Platinum to Valterra Platinum.

External stakeholder engagement during this surveillance audit was subject to the limitations described in Sections 1.2.3 and 2.3. As a result, the audit team's ability to obtain and verify a broad range of stakeholder perspectives was more limited than would typically be expected during a full audit. Information received through stakeholder interviews and written submissions was considered alongside documentation, site observations, grievance records, and interviews with mine personnel.

Based on the evidence reviewed, the audit team confirmed that progress has been made in implementing actions identified during the initial audit. However, additional verification of the effectiveness of engagement processes will be required during the next full (renewal) audit. Areas identified for further review include stakeholder participation, transparency and accountability mechanisms, communication of operational information, grievance processes, and the effectiveness of engagement approaches in supporting meaningful dialogue with

affected stakeholders. The audit has identified areas where additional verification, deeper engagement, and further assessment will be required during the next full (renewal) audit, including:

- **External Stakeholder Engagement (Chapter 1.2)** - further consideration of how engagement approaches support inclusive and meaningful participation across affected communities in a complex local context.
- **Transparency and Accountability (Chapter 1.2)** - review of approaches for sharing information on performance, commitments, and operational changes with external stakeholders.
- **Grievance Mechanisms (Chapter 1.4)** - review of how grievance mechanisms are accessed and experienced by external stakeholders, including awareness, responsiveness, and resolution processes.
- **Local Employment, Procurement, and Development (Chapter 2.3)** - examination of how employment, procurement, and social investment commitments are implemented in practice and perceived at community level.
- **Environmental Information and Communication (Chapter 3.3)** - consideration of how environmental monitoring and impact information is communicated and understood by surrounding communities.

4.1.3. Chapter 1.3—Human Rights Due Diligence

Chapter 1.3 was partially reviewed during the surveillance audit, with a focus on four requirements, including three critical requirements. Critical requirements 1.3.1.1 and 1.3.2.1 retained their Fully Meets rating from the initial audit, as confirmed by evidence assessed during this review. Progress on critical requirement 1.3.3.3 is detailed in Section 3.5.

The site has established an ongoing process to identify and assess potential human rights risks, particularly those affecting workers and contractors. Improvements were noted in Contractor Management Procedures, including clearer induction processes and enhanced awareness initiatives regarding workers' rights. Verification through worker engagement indicated a general understanding among employees and contractors of their right to join unions and participate in collective bargaining structures. Further actions are required to evaluate the effectiveness of training and awareness programs, including monitoring workers' comprehension and assessing contractor compliance with worker rights obligations.

It was noted during the audit by the site team that as part of the move from Anglo American to Valterra, the Company is working with a consultant to develop suitable social management systems, including updating human rights risk assessment.

Limitations in external stakeholder engagement during this surveillance audit restricted the audit team's ability to fully assess certain community-related aspects of the human rights due diligence program through direct engagement and were therefore taken into account and considered alongside documentary evidence, site observations, and management interviews, with outstanding HRDD-related issues identified for deeper examination during the next full audit.

4.1.4. Chapter 1.4—Complaints Mechanism/Access to Remedy

Chapter 1.4 was partially reviewed during the surveillance audit, with a focus on four requirements, including critical requirement 1.4.1.1. which was rated as Substantially Meets at the initial audit. Progress on the critical requirement is detailed in Section 3.5.

“Your Voice” remains the primary process for all stakeholders to report grievances to the mine. There are various means of communicating this process to stakeholders, including multi-language printed material. These have been added to and strengthened since the 2022 IRMA assessment.

Grievances and related actions continue to be tracked in Isometrix and reported to senior site and corporate officers monthly. There has been an overall increase in numbers year-over year due to improved awareness and the mine no longer screening out any reported grievances.

The mine regularly communicates to contractors that the Valterra process is available to them, including via the Living with Dignity hub. However, the mine has no direct oversight of contractor processes to ensure they are in place, utilized, or whether grievances are appropriately managed by contractors.

The mine conducted a grievance process survey with stakeholders and used the data to guide process improvements. The updated and rebranded (Valterra) process, dated September 2025, included specific timelines for response and follow-up, with tracking, and ensures that external-facing processes such as regulators and NGOs are not excluded. The process is aligned with UN Guiding Principles, and this is referenced in the procedure, but the mine has not documented a mapping against all of those principles. There has been no direct feedback on the updated process from stakeholders yet.

The limited level of external stakeholder engagement during this surveillance audit constrained the audit team’s ability to further investigate topics raised in written submissions relating to grievance mechanisms and stakeholder engagement. These matters were assessed based on available documentation and management interviews, with additional verification identified for the next full (renewal) audit.

4.1.5. Chapter 1.5—Revenue and Payments Transparency

Chapter 1.5 was partially reviewed during the surveillance audit, with a focus on five requirements, including critical requirement 1.5.5.1, which was rated Fully Meets at the initial audit. Evidence reviewed during the surveillance audit confirmed the prior rating.

The operating company provided documentation demonstrating compliance with EU Accounting and Transparency Directives, UK legislation implementing these directives, Global Reporting Initiative (GRI) transparency standards, and the Australian voluntary Tax Transparency Code. The 2024 Financial Statement and Tax and Economic Contribution Report list all regulations complied with, show tax paid in all jurisdictions, and include signed commitments by the board and senior leadership. These documents were verified during the review, supporting the rating of Fully Meets for this critical requirement.

Evidence shows that Anglo American and its successor entity, now Valterra Platinum, maintain compliance with international transparency standards and statutory audit requirements. Independent auditor reports for 2023 and 2024 confirm that consolidated and separate financial

positions, performance, and cash flows are prepared in accordance with International Financial Reporting Standards (IFRS) and the Companies Act of South Africa. These reports were reviewed and verified during the audit.

The site does not provide disaggregated revenue data at the Mototolo level; instead, reporting occurs at the Rustenburg Platinum Mines level. Production volumes and other revenue types are available on a mine-by-mine basis, but fines and penalties are consolidated and not reported individually for Mototolo. Funding for political campaigns remains prohibited. Statutory audits conducted by PricewaterhouseCoopers include compliance with European Union requirements. Independent auditor reports demonstrate compliance with IFRS and South African Companies Act requirements, and these were confirmed through document review.

Training on the Code of Conduct is included in employee induction and annual online courses for decision-making personnel. Training records for 2024 confirm participation. However, interviews with employees indicated that while the course addresses conflicts of interest effectively, it does not comprehensively cover anti-corruption measures. Contractor training evidence was not provided, and the Sustainable Mining Plan addressing ethical value chains and responsible supplier management remains partially implemented. Workers interviewed during the surveillance audit noted that supplier oversight improvements were “in progress” but not yet visible at the operational level.

Updates since the previous audit include the renaming of the entity to Valterra Platinum in 2024, following changes in shareholding and its listing on the Johannesburg Stock Exchange (JSE), with continued secondary listing on the London Stock Exchange (LSE). These changes enhance transparency obligations through adherence to JSE and LSE requirements, including anti-corruption and governance standards. No significant changes to operational payment processes were reported, but improvements in permit management were noted. Previously overdue compliance actions related to permit renewals have been addressed through weekly review sessions, integration of permitting into complex-level assurance reporting, and escalation processes involving senior management. Notifications and dashboards now track permit status daily, and new systems enforce accountability for overdue actions. Current initiatives include acquiring permits for flammable substances and water use licenses for recently purchased infrastructure. Interviews with permitting staff confirmed that the new dashboard system introduced in 2025 has improved visibility and reduced delays compared to prior years.

4.2 Principle 2: Planning for Positive Legacies

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

Chapter 2.1—Env/Soc Impact Assessment and Management

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

The site's original Environmental Social Impact Assessment (ESIA), and subsequent additional environmental authorization applications, were completed under South African licensing requirements and included full public participation. The latest environmental authorization process was completed in 2024 and was authorized in terms of South African legislative requirements. Monitoring and compliance audits remain in place, with results shared annually with regulators and stakeholders.

Chapter 2.2—Free, Prior and Informed Consent

Chapter 2.2. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that the criteria addressed in the chapter continue to be not relevant at the mine. During the review this chapter remains as not relevant.

Chapter 2.3—Community Support and Benefits

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

The site has implemented several social benefit programs and adapted initiatives in response to feedback received through its engagement processes. Documentation reviewed during the surveillance audit indicated continued implementation of community development, employment, procurement, and social investment initiatives. The audit team reviewed available evidence relating to these programs and identified community benefit sharing as an area for further review during the next full (renewal) audit.

Written submissions received during the audit process included concerns relating to employment opportunities, procurement participation, community development benefits, and transparency in the distribution of socioeconomic benefits. These submissions were reviewed by the audit team and considered alongside other available evidence. However, due to the limited scope of stakeholder engagement during this surveillance audit, the audit team was not able to independently verify all issues raised or determine the extent to which the views expressed were representative of affected stakeholder groups. These topics have therefore been identified for further examination during the next full (renewal) audit.

Chapter 2.4—Resettlement

Chapter 2.4. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that the criteria addressed in the chapter continue to be not relevant at the mine. During the review this chapter remains as not relevant.

Chapter 2.5—Emergency Preparedness and Response

Chapter 2.5 was partially audited during the surveillance audit. Auditing was focused primarily on the two critical requirements from this chapter (2.5.1.1., 2.5.2.1.), which were rated substantially meets in the initial audit. Progress on the critical requirements is summarized in Section 3.5.

The emergency preparedness plan has undergone revision in 2024 and now includes stakeholder mapping and annual updates shared with local communities and authorities. The mine reported that updates were developed in consultation with stakeholders, including

doorstep communities, local authorities, and neighboring entities such as Didingwe River Lodge and Leshaba Community. This process aligns with commitments made in the previous audit, although documentation of conformance checks against UN APELL remains incomplete.

Emergency response drills have been conducted since the last audit, including a major tailings emergency drill in Q4 2024 simulating a Mareesburg Tailings Storage Facility (TSF) failure. This drill involved over 80 participants from local communities and authorities and tested emergency sirens and messaging systems. Lessons learned (reported in the meeting minutes) included identifying vulnerable individuals requiring assistance, which led to a systematic approach for tracking special needs within the community. Underground emergency drills continue monthly as required by law, and outcomes are recorded in Isometrix.

Advancements have been made in technology integration to strengthen emergency response. The mine has initiated deployment of an Artificial Intelligence (AI) camera platform for proximity detection and operational monitoring, scheduled for installation in Q1 2026. Additionally, the Missing Person Location (MPL) system has been introduced to enable real-time and offline tracking of personnel and assets, improving emergency response and operational decision-making. These innovations form part of an integrated solution combining Lamproom Management, Proximity Detection Systems, AI cameras, and MPL technology. Safety enhancements also include the Tactical Hawk Ultra High-pressure foam firefighting unit for rapid deployment during Trackless Mobile Machinery (TMM) fire incidents and a low-profile ambulance designed for underground medical needs in collaboration with emergency medical contractors.

Mine Rescue Services' performance remains strong, with the Eagles team averaging 99.09% compliance and Hawks 97.21% at the time of the surveillance audit, both achieving 100% in room inspections. Recruitment and advanced training have been prioritized, with quarterly and ropes training scheduled through December 2025. Plans are in place to upgrade the Proto building to accommodate ten members per team by 2026 and continue the rollout of ProAir systems initiated in October 2025.

The doorstep communities were not engaged during the surveillance audit due to limitations on time, resources and security risks. These are the key communities that would be engaged in the emergency preparedness process, and this has been identified as an area for focus in the next full (renewal) audit process.

Chapter 2.6—Planning/Financing Reclamation & Closure

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

At the initial audit, the Mine Closure Plan was at the draft stage. Its development and implementation was marked for follow-up at the surveillance audit. The mine completed the closure plan and closure cost liability assessment for Mototolo and submitted them to regulators ahead of the August 2024 action due date.

The process requires annual review/update to the closure plan and projected closure costing. At the time of the IRMA surveillance assessment, the 2024 plan was completed and submitted, and the 2025 plan was in draft form. The implementation of the closure plan was identified for follow-up during the surveillance audit.

During reviews, mine personnel confirmed that the closure plan is dynamic and could be updated more frequently if changes dictate. The mine also completes closure plans as part of the planning for new projects. Ongoing and recent new activities include exploration drilling and the Der Brochen project. Rehabilitation of exploration drill sites and access roads is generally planned to be completed immediately upon completion of drilling. However, some surface areas (roads especially) are not immediately rehabilitated due to overlap with active chrome mining activities by other operators.

The mine also prefers concurrent rehabilitation, as waste rock dumps, and parts of the tailings storage facility (TSF) are closed. Some innovative processes for in-situ tailings rehab and cover design in the absence of adequate topsoil are being trialed. These were discussed during the assessment and show promise for incorporation into standard practices. As an example: for the Helena TSF (in care & maintenance) the budget for closure/rehab is approved and key performance indicators (KPIs) are in place.

The mine keeps detailed records of rehabilitation work but has not yet developed any dashboard for rehab tracking.

Legislation requires a specific costing process and tools to evaluate rates. In some cases, it is overly simplistic and underestimates when compared to the mine's closure cost calculations. The resulting cost used by the mine for planning purposes is therefore higher than the minimum required under legislation. Financial vehicles provided to meet legislation are based on the legislative process, not the mine's process, however.

Financial vehicles are a composite of a trust fund (historical requirement) plus bank guarantees. There is no self-financing by the mine. Currently, due to mine sales and re-organisation, there is a process of integrating trusts across Valterra operations. Sale of Rustenburg operations has released some funds that result in an excess, and details have not yet been resolved.

4.3 Principle 3: Social Responsibility

During the previous audit, this principle received an overall score of 78%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 3.1—Fair Labor and Terms of Work

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

Specifically relevant to the IRMA requirement in 3.1.2.1, Valterra has continued to implement the Anglo American Responsible Sourcing Standard for Suppliers (2024). Section 3.5 of the Standard

references “Permit freedom of association and allow unrestricted access to confidential grievance mechanisms”. Evidence collected through worker interviews reflects this.

Although measures under section 3.1.3.3 (prevent and address harassment) have been implemented, differences persist in how these are understood and applied by employees and contractors. Surveillance interviews indicated that some contractor personnel expressed uncertainty about reporting processes and concerns about potential repercussions. Both employees and contractors reported limited awareness of whether grievances raised had led to investigations or corrective actions. Continued engagement will be necessary to strengthen confidence in the operational-level grievance mechanism and demonstrate its effectiveness.

Chapter 3.2—Occupational Health and Safety

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

Verification of the implementation of corrective action plans regarding hot work risks was identified for follow-up at the surveillance audit. The mine has implemented numerous measures to protect the safety and health of workers, including updated hot work procedures, risk assessments, and training programs. The hot work procedure, revised in 2024, now requires a Hot Work Permit before commencing any task, with strict compliance to clause 9.9.2 and inspection of the work area as per clause 9.11.4. A Hazard Identification and pre-work Risk Assessment ‘Stop, Look, Assess and Manage’ (SLAM) must be completed by the person performing the task. The work area must be prepared by watering down an 11-meter radius, removing combustible materials, and appointing a designated fire watch to monitor the area during and after hot work for at least 30 minutes. Fire suppression systems, CO_2 extinguishers, and flashback arrestors are mandatory, and welding machines must have voltage-reducing devices fitted. For underground hot work, gas detection instruments must be used to test for flammable gases before work begins. These operational controls were verified through document reviews of updated procedures, site inspections, and interviews with supervisors, demonstrating a structured approach to mitigating fire hazards.

Evidence confirms that the mine has rolled out updated Job Risk Assessments (JRAs) for high-risk tasks, including welding, cutting, and gouging. The JRAs identify hazards such as unauthorized personnel, incorrect handling of heavy equipment, uneven surfaces, flammable gases, electrical risks, and thermal hazards. Controls include barricading work areas, using protective clothing, pre-inspection of equipment, and implementing emergency response plans. The revised JRAs now include specific references to cutting or welding near flammable materials, mobile equipment, and oxygen cylinders, which were previously missing. Interviews with engineering teams and supervisors confirmed that these updates were developed collaboratively, and training records reviewed show that by July 2023, 34 out of 35 employees had completed hot work training, with the remaining individual having left the mine. SLAM compliance data collected between September and October 2025 shows 99% adherence, with 96% confirming fatal risk controls were applied. These figures were verified against Isometrix system reports, indicating integration of continuous risk assessment practices.

The Mototolo Complex baseline risk assessment, based on the life cycle approach, has been completed, covering all operational phases. Task-based risk assessments for hot work have been updated and integrated into operational procedures. The previous audit noted inadequate controls for aboveground fire and explosion hazards, particularly hot work near flammable materials. These gaps have now been addressed through detailed procedural updates and training. The mine also introduced monitoring enhancements, such as requiring control room oversight during hot work and environmental system monitoring to supplement fire watch duties. These improvements were confirmed through control room observation logs and system configuration reviews.

The previous audit identified an underground female toilet with gaps around the door, causing discomfort. This issue has been corrected, and the mine is implementing Bio-Separator flushing systems to improve hygiene and sustainability. These systems reduce water usage, require no external plumbing or electricity, and simplify maintenance through integrated waste transfer tanks. A structured implementation plan was presented to the Safety, Health and Environment (SHE) manager and engineering team, with funding approval scheduled for November 2025 and installation planned for January 2026. Evidence of this improvement was confirmed through project plans, budget approval documents, and interviews with engineering staff.

Additional initiatives include the “Keep It Safe for My Family” campaign launched in October 2025 to strengthen safety culture. The campaign promotes engagement through family-oriented competitions, technology-driven safety innovations, and recognition programs such as Paid Time-Off (PTO) Excellence Rewards. SLAM verification now incorporates QR codes for enhanced tracking, and supervisors are encouraged to nominate outstanding safety practices weekly. These initiatives were verified through campaign materials, interviews with employees, and review of PTO reward logs, which show active participation. Workers interviewed during the audit expressed positive feedback on the campaign, noting that it “makes safety personal” and encourages accountability. These initiatives align with Mine Health and Safety Act (MHSA) requirements and reinforce behavioral safety.

Overall, the mine has made substantial improvements since the previous audit. Critical gaps in hot work risk management have been addressed through updated procedures, JRAs, and training. SLAM compliance is high, and safety culture initiatives are actively promoted. Sanitation improvements are underway, supported by a clear implementation timeline. Remaining challenges include ensuring consistent application of updated JRAs across all areas and maintaining continuous training coverage.

A few concerns noted during the assessment pointed to the need for continued review of safety processes, communication of risks and controls to affected workers, and verification of effectiveness. Examples included:

- Eyewash basins with inadequate flow at the concentrator chemical storage area, which had not been detected during inspections,
- Compressed oxygen, and flammable compressed gases and paint with insufficient spacing or suitable firewall in-between,
- A radio battery in a refuge chamber in Le Bowa was dead/non-functioning.
- At 52 Dam, there was a flotation vest and two life rings. The life rings did not have a rope attached and personnel in the area did not know how to use them.

- Electrical panels at an ore dump and on the associated hydraulic power pack, had loose cable glands, wire with no strain relief, an open cable hole, and loose access panel on electric motor – issues which had not been detected during the daily inspection.
- During the assessment a worker at the active panel needed to rinse something from their eye and suitable first aid equipment was not readily available at the work area. Discussion suggested that first aid supplies are typically located at meeting areas or refuge chambers, which means they are sometimes a considerable distance from work areas.

Chapter 3.3—Community Health and Safety

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

The mine completed their review and update of relevant Social and Human Rights Impact Analysis (SHIRA) in July 2025. Communication of significant potential risks and impacts to communities was the main gap identified at the initial audit. Since the initial IRMA audit, the mine invested quite a lot of effort in community health and safety engagement, primarily as part of the Global Industry Standard on Tailings Management (GISTM) program. Evidence of engagements reviewed during the surveillance assessment included communication materials and meeting plans, for several local communities, various local leadership such as Ward Councillors, Tribal Leaders. The mine has visited local facilities, and worked further downstream than initial outreach (based on Extended Inundation Zone concept suggested by Tailings Committee), etc. The mine indicated they plan to bring local Ward Councillors to visit tailings storage facilities to ensure understanding of structure, management processes and failure mechanisms, but this has not yet taken place. For directly impacted communities, remotely activated sirens have been installed.

Risks related to health impacts were well understood and no significant changes were made as part of the review. The mine's efforts to identify communicable diseases in local communities and develop related support/mitigation programs have continued to provide awareness and education on communicable diseases. This topic was identified for follow-up at the surveillance audit. This is acknowledged to be an ongoing challenge.

Written stakeholder submissions received during the audit process raised environmental health topics relevant to community health and safety. Due to the scope and stakeholder engagement limitations associated with the surveillance audit, these matters were not assessed in sufficient detail to support conclusions regarding site performance and have been identified for follow-up during the next full (renewal) audit.

Chapter 3.4—Conflict-Affected and High-Risk Areas

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

Chapter 3.5—Security Arrangements

Chapter 3.5 was partially audited during the surveillance audit. Auditing was focused primarily on four requirements from this chapter, including critical requirement 3.5.1.2, which was rated Fully Meets during the previous audit. Evidence reviewed during the surveillance audit confirmed the prior rating for this requirement.

The procedure for the use of force continues to be documented in Section 9 of the Use of Force Group Policy (pages 5–12), which aligns with Section 49 of the Criminal Procedure Act 51 of 1977. The policy stipulates that force may only be applied when an attack against a person is imminent or has already started, and that any use of force must be reasonable, proportional, and necessary. Where a suspect uses a weapon or firearm, the response team is authorized to use firearms in self-defense. The response team is trained to form a triangular formation for safety and control, and escalation measures include baton strikes and less-lethal ammunition if resistance cannot be overcome. These operational details were verified through policy document reviews, training records, and interviews with Protection Services personnel, confirming that the procedure is actively implemented.

Since the initial audit, the operating company formally applied the Workplace Risk Assessment and Control (WRAC) methodology, and the analysis was carried out by the social performance team in collaboration with the Protection Services senior superintendent. Approval was granted by the Protection Services manager in 2024, as confirmed through signed approval documents. However, there was no evidence that information was obtained from diverse groups or that perspectives of women, children, or other vulnerable groups were included. While the Community Engagement Forum and Social and Labor Plan process, implemented in 2022, are expected to address security issues moving forward, documentation reviewed did not demonstrate stakeholder diversity. Training materials on Voluntary Principles on Security and Human Rights were reviewed, which include definitions of human rights and guidance on arrest and detention, but these do not substitute for direct stakeholder engagement. Interviews with community representatives indicated that while security topics are discussed during meetings, some participants felt that engagement could be more inclusive and transparent.

The mine has identified security-related risks and included collaboration with communities and workers in its social and human rights impact and risk analysis process. Interviews confirmed that discussions on security risks occur during social performance meetings with communities, and documentation of these meetings was requested and partially provided for verification. Public security is only required during times of civil unrest, and a memorandum of understanding (MoU) exists with two local South African Police Service (SAPS) stations. Monthly meetings with SAPS stakeholders were verified through meeting minutes from 2024 and 2025, where voluntary principles and security rights were discussed.

The site uses public security personnel (SAPS) for disturbances and high-risk situations indirectly related to operations. It does not make consistent or direct use of public protection services, and similarly, private protection services are not consistently used. This topic was identified for follow-up at the surveillance audit.

Chapter 3.6—Artisanal and Small-Scale Mining

Chapter 3.6 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified that the issues addressed in the chapter continue to not be applicable at the mine.

Chapter 3.7—Cultural Heritage

This chapter was not audited in this surveillance audit. It was noted, however, that there is one outstanding issue related to relocation of graves.

The relocation of graves has been an ongoing matter since 2017. To address this, the mine established a community trust intended to provide financial benefits as an offset for the relocation and broader community development. In recent years, the trust has become inactive following the passing of a trustee, and no replacement has been elected. As a result, the mine is holding the allocated funds until governance of the trust can be restored. Community members, many of whom face socio-economic challenges, have expressed a preference for direct benefits from the mine. However, disagreements regarding representation on the trust's board have prevented resolution of the matter.

.4.4 Principle 4: Environmental Responsibility

During the previous audit, this principle received an overall score of 77%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 4.1—Waste and Materials Management

Chapter 4.1 was partially audited during the surveillance audit. Auditing was focused primarily on eight requirements from this chapter, including four critical requirements (4.1.4.1, 4.1.5.1, 4.1.5.6, 4.1.8.1) and on corrective actions from the previous assessment, including site visits to the waste yard and tailings storage facility. Critical requirements 4.1.4.1., 4.1.5.6. and 4.1.8.1. were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for these critical requirements. Progress on critical requirement 4.1.5.1., which was rated Substantially Meets at the initial audit, is summarized in Section 3.5.

Evidence reviewed during the surveillance audit verified that the site maintains a comprehensive waste management procedure aligned with the corporate Zero Waste to Landfill strategy. The guideline developed by Interwaste Management was reviewed and confirmed to be site-specific, and hazardous material handling follows documented standards. The site remains self-declared Zero Waste to Landfill, and external audit reports from 2024 were reviewed to verify compliance. Interviews with the waste management contractor confirmed that segregation and disposal practices are actively monitored and enforced.

The Mareesburg Tailings Storage Facility (TSF) design incorporates best available technologies, including advanced liner systems, impermeable layers, stability bands, and fiber optic cables for leakage monitoring. Technical assessments such as 3D seepage modeling, dynamic deformation analysis, and seismic risk evaluations were reviewed to confirm mitigation of liquefaction risks. Additional improvements since the previous audit include installation of Time-

Domain Reflectometry (TDR) probes in 2024 to monitor saturation levels within the TSF. Evidence of these enhancements was verified through engineering reports, instrument calibration records, and site inspections.

Reports confirm regular inspections of dams and storage facilities, verification of critical controls, and updates to risk management processes. These findings were integrated into the management review for 2024 and 2025, the minutes of which were reviewed during the audit. Operational improvements since the previous audit include the appointment of a full-time waste management contractor in early 2024 to manage day-to-day waste sorting and removal, implementation of a waste manifest system, and monthly reporting. Funds have been allocated for a centralized salvage yard, with project plans reviewed and capacity issues documented. Hydrocarbon waste containment infrastructure was previously identified as not meeting best practice; improvements include revised procedures for hazardous waste storage and installation of oil separators at workshops in mid-2025. The contractor conducts biannual audits of disposal facilities, and audit reports from March and September 2025 were reviewed to confirm compliance and prevent illegal dumping.

Emergency preparedness and stakeholder engagement were verified through documentation and workshop attendance records. The updated Tailings Storage Facilities presentation (2025) verified that emergency awareness sessions were held with internal and external stakeholders, including local communities, South African Police Service (SAPS), and municipal authorities. Flood zone mapping for Helena and Mareesburg TSFs was completed in 2024, and estimated arrival times for flood scenarios were communicated to stakeholders. Emergency assembly points have been identified and signage installed at key locations, with feasibility checks for community sites confirmed through inspection photos and reports. Engagement plans include awareness workshops for Leshaba and Didingwe communities, and drills scheduled for Q4 2025 were verified through training calendars and invitations to external emergency services. Interviews with community representatives indicated that awareness sessions were helpful, but some requested more frequent updates on TSF safety measures.

Overall, the mine demonstrates compliance with critical requirements for waste and materials management, supported by documented procedures, technical standards, and operational improvements. Evidence reviewed during the audit, including external audit reports, engineering assessments, inspection records, and stakeholder interviews, has verified that improvements since the previous audit have been implemented effectively. Remaining challenges include ensuring timely completion of the salvage yard project and expanding community engagement frequency to address transparency concerns raised during interviews.

Chapter 4.2—Water Management

Chapter 4.2 was partially audited during the surveillance audit. Auditing was focused primarily on ten requirements from this chapter, including two critical requirements which were rated Substantially Meets at the initial audit (4.2.4.1, 4.2.4.4) and on corrective actions from the previous assessment. Progress on critical requirements is summarized in Section 3.5.

In June 2025, the mine implemented an approved and revised (Valterra branded) Adaptive Water Management Plan (AWMP), containing Trigger Action Response Plans (TARPs), aligned with the latest (September 2023) Water Use License, IRMA water quality criteria and relevant Group standards.

The AWMP also includes a review schedule, with assigned responsibilities. The review schedule is not contained within the AWMP, but an annual review of the triggers is scheduled in the mine's compliance management system. The AWMP also referenced the related operating procedures, water sampling, monitoring and reporting procedure, which requires analysis of all relevant parameters included in the TARP.

In support of and alignment with the AWMP, the site also updated site wide water management Responsibility Assignment Matrix (RACI) in 2025, and the site-wide water balance update and recalibration was completed in December 2024.When predetermined monitoring triggers are met, investigation is triggered. Some actions are long-term and not expected to immediately impact water quality parameters, especially those related to tailings dams and return water systems (RWS).

An audit of the AWMP program was conducted by independent assessors, to verify that it was fit for purpose and met the relevant criteria.

Based on risk assessment, primary risks at Mototolo are related to uncontrolled release/discharge, and groundwater pollution.

Der Brochen is water positive, but the entire mine still requires some water from Lebalelo. The mine is using much less than their permitted water allocation from this source but still trying to reduce their dependence on external water sources. A dashboard to track various water conservation and quality measures was developed and is monitored by senior leadership. A bonus metric is aligned to water efficiency.

The site has ongoing issues with a plume of nitrates and phosphates in ground water. A license to pump and treat is required to manage this appropriately. Helena Tailings Storage Facility (TSF) has a sulphate plume, which is being controlled via scavenger wells. Additional wells were recently installed for improved management. The plume management program was re-assessed in 2025 to evaluate long-term expectations. Facility personnel reported that the long term plan should be updated by the end of 2027.

Surface waters, including the Klein Dwars and Groot Dwars Rivers have been impacted by mining activities in the area. The Mototolo mine is making a lot of effort to understand storm water management for the mine in order to avoid adding sedimentation in the river A visit to the active Mareesburg TSF included observation and discussion regarding the newly completed stormwater diversion system, which is a concrete-lined channel with weirs and other structures to slow water and manage sediment before discharge.

Chapter 4.3—Air Quality

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

Evidence reviewed during the surveillance audit shows that the mine has made progress in addressing gaps identified previously. At the time of the initial audit, the Air Quality Management Plan (AQMP) for the concentrator was dated 2016 and did not meet Anglo American's Air Standard requirements for defining site-specific air quality control strategies, objectives, timeframes, and communication processes. During this surveillance audit,

documentation confirmed that the AQMP has been revised and integrated into a comprehensive Air Quality Monitoring Program (AQMPr) finalized in July 2025 by a third party contractor. This program aligns with the National Environmental Management: Air Quality Act (NEM:AQA), National Ambient Air Quality Standards (NAAQS), and international best practice under IRMA and IFC Performance Standards.

The updated AQMPr includes detailed methodologies for passive sampling of fugitive gases, dust fallout monitoring, and continuous ambient air quality monitoring. Passive sampling uses diffusive samplers for NO_2, SO_2, ozone, and VOCs (benzene), deployed quarterly at strategic locations including Lebowa and Borwa shafts, the concentrator, Mareesburg Tailings Storage Facility (TSF), and Der Brochen expansion areas. Dust fallout monitoring follows ASTM D1739 standards and National Dust Control Regulations, with 36 monitoring points across the site, sampled monthly. Continuous monitoring employs advanced technologies units at five locations providing real-time data on PM_{10}, $PM_{2.5}$, NO_2, SO_2, and ozone. These instruments are calibrated annually and maintained monthly, with calibration certificates and maintenance logs reviewed during the audit. Data validation procedures were confirmed through monthly and quarterly reports, which include completeness checks and trend analysis.

The monitoring program specifies compliance thresholds based on NAAQS, World Health Organization (WHO), and IRMA guidelines, with PM_{10} limits set at 75 µg/m³ (24-hour) and $PM_{2.5}$ at 40 µg/m³ (24-hour) under national standards, while striving toward stricter international limits. Evidence of performance was verified through trend analysis reports for Q2 and Q3 2025, which show that PM_{10} and $PM_{2.5}$ concentrations remained below NAAQS limits at all monitoring stations, with occasional short-term spikes during high wind events. These exceedances were documented with corrective actions such as increased watering and operational adjustments. Reports incorporate meteorological data, statistical evaluations, and recommendations for corrective actions. The program also integrates grievance review, ensuring that community concerns related to dust or emissions are addressed through documented feedback mechanisms. Grievance logs for 2024–2025 were reviewed, showing a decline in dust-related complaints compared to 2023, which supports the effectiveness of mitigation measures.

Stakeholder engagement has improved significantly since the previous audit. The updated plan confirms consultation with local communities and authorities during site selection for monitoring equipment, as well as communication of monitoring objectives and emergency preparedness measures. Engagement activities included awareness workshops in March and August 2025 and coordination with municipal and provincial authorities, as documented in social performance records and attendance registers. Stakeholder engagement records reviewed during the assessment indicate that awareness workshops and information-sharing activities were undertaken with local communities and authorities. Additional evaluation of the effectiveness of these engagement activities will be undertaken during the next full audit.

Written stakeholder submissions received during the audit process raised environmental topics relevant to air quality management. These submissions were reviewed by the audit team and considered in planning future audit activities. Due to the scope and stakeholder engagement limitations associated with the surveillance audit, these matters were not assessed in sufficient detail to support conclusions regarding site performance and have been identified for follow-up during the next full (renewal) audit.

Operational improvements since the previous audit include the installation of real-time monitoring systems in early 2025, expansion of monitoring locations to cover sensitive receptors, and implementation of rigorous data validation protocols. The mine has also introduced proactive measures such as meteorological stations installed in mid-2024 to support dispersion modeling and enhance predictive capability for air quality management. These actions were confirmed through equipment installation records, calibration certificates, and system dashboards reviewed during the audit. Interviews with environmental staff indicated that predictive modeling has improved planning for dust suppression during high-risk weather conditions.

Overall, the mine demonstrates substantial improvement in air quality management since the previous audit. Evidence reviewed, including technical reports, monitoring data, calibration records, grievance logs, and stakeholder interviews, verified that gaps identified in 2023 have been addressed through updated plans, expanded monitoring, and enhanced stakeholder engagement. Remaining challenges include improving real-time data accessibility for communities and maintaining consistent calibration schedules across all monitoring units.

Chapter 4.4—Noise and Vibration

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

Evidence reviewed during the surveillance audit confirmed that updated noise and vibration surveys are undertaken as the mine expands.

Operational evidence shows that annual ambient noise monitoring is conducted by external consultants, with the 2025 survey underway at the time of the audit and the 2024 report available for review. Monitoring includes daytime and nighttime measurements at strategic points near ventilation fans and haulage routes, considering wind direction and operational activities. The audit team verified 2024 monitoring data, which showed compliance with national noise standards and no exceedances at sensitive receptors. The mine is installing real-time monitoring instruments to capture continuous noise data, aiming to provide verifiable records for grievance resolution and compliance. This improvement represents progress since the previous audit, where monitoring was limited to periodic assessments. The real-time system is approximately 90% installed as of November 2025, pending IT integration for functionality. Evidence of installation was confirmed through procurement records, site inspections, and IT integration plans.

Noise control measures include equipment registers to track noise outputs, aerial sampling during quieter periods, and operational restrictions such as prohibiting blasting at night and covering surface blasts to reduce noise emissions. As an underground operation, blasting-related noise is less significant compared to open-cast mines, and vibration impacts are minimal due to the depth of operations.

No grievances related to vibration were recorded in the grievance management system during the reporting period, confirming that no formal complaints were raised or required resolution through that process.

Communication of monitoring results to stakeholders occurs through social performance channels rather than direct distribution of technical reports. Findings are presented in simplified formats during community sessions, and full reports are available upon request. Grievance registers for 2024–2025 were reviewed, showing that noise-related complaints decreased compared to 2023, suggesting improved control measures. Investigations involve subject matter experts and, where necessary, external specialists. Feedback is provided to complainants, and remediation measures are implemented collaboratively until resolution. All grievance documentation and monitoring records are maintained for compliance and transparency. Interviews with community representatives confirmed that while they receive updates during meetings, some requested more frequent real-time data sharing to enhance transparency.

Overall, the mine demonstrates structured compliance with screening and baseline assessment requirements and shows improvement through the introduction of real-time monitoring systems, enhanced grievance handling, and proactive community engagement. Evidence reviewed, including monitoring reports, grievance logs, installation records, and stakeholder interviews, verified that progress has been made since the previous audit. Continued focus on operational controls for ventilation fan noise and transparent stakeholder engagement will be necessary before the next audit cycle.

Chapter 4.5—Greenhouse Gas Emissions

Chapter 4.5 was partially audited during the surveillance audit. Auditing was focused primarily on critical requirement 4.5.1.1, which was rated Substantially Meets at the initial audit. Progress on this critical requirement is summarized in Section 3.5.

Evidence reviewed during the surveillance audit shows that the mine has made progress in implementing a structured approach to greenhouse gas (GHG) management. The Climate Change Policy, applicable to all operations including Mototolo, sets a group target of carbon neutrality by 2040. Each operation is required to define annual targets by converting total energy consumption into gigajoules and emissions into tonnes of CO_2e, using a 2016 baseline and applying year-over-year improvements normalized against intensity. This was verified through policy documents and corporate sustainability reports reviewed during the audit.

Performance data for May to October 2025 was reviewed to confirm trends in diesel and electricity consumption, which directly influence GHG emissions. Diesel usage exceeded targets in May by 9% (246 m^3 vs. 225 m^3) but improved significantly in subsequent months, with reductions of 15% in June and 17% in July, followed by smaller reductions in August (-2%) and September (-5%). Electricity purchased from the grid remained close to targets, with slight overages in May (+5%) and June (-5%), and minor reductions in July (-3%), August (0%), and September (-2%). CO_2 emissions data reflects these consumption patterns: monthly emissions from diesel remained relatively stable at 17–18 metric tons CO_2e, while emissions from electricity dominate the profile, ranging from approximately 8,200 to 10,800 metric tons CO_2e per month. The highest electricity-related emissions occurred in February (10,878 tCO_2e) and August (10,713 tCO_2e), with slight decreases in later months. These figures were verified through energy dashboards, monthly GHG reports, and Isometrix data extracts.

The mine has implemented several initiatives to reduce GHG emissions, as outlined in the Mototolo GHG Emissions Reduction Action Plan (updated in 2024). Conveyor belt operation

hours were reduced by three hours daily at Lebowa, saving approximately 2,190 MWh annually. Compressed air systems were optimized by reducing compressors from four to two plus high-pressure efficiency units, with full rollout planned for Borwa by December 2025. Additional measures include transitioning to IE3+ energy-efficient motors, installing power factor correction equipment at the Chrome Plant, and deploying power monitoring software for real-time energy tracking to identify inefficiencies. Practical interventions under consideration include auto-stop/start controls for idling equipment, LED lighting retrofits, shift-based energy usage reporting, and quarterly energy audits. Evidence of these initiatives was verified through engineering project plans, procurement records, and interviews with electrical teams, who noted improved visibility of energy performance since power monitoring implementation.

Targets have been established in the 2024 Reduction Action Plan to guide performance improvements: Short-term (1–2 years): 10% reduction in GHG emissions from the current baseline (~424,000 tCO_2/year). Medium-term (3–5 years): 20% reduction through operational efficiency and technology upgrades. Long-term (5+ years): renewable energy integration (e.g., 2–5 MW solar photovoltaic (PV) or natural gas) and carbon offset programs.

The action plan will be reviewed every five years or sooner in response to technological advancements, operational changes, or new corporate GHG targets. Evidence of target-setting and review cycles was verified through corporate sustainability documentation and site-level planning records.

Stakeholder engagement was confirmed during the development of the updated plan, with consultation involving operational teams and engineering specialists to ensure feasibility of interventions. Interviews with supervisors indicated that energy-saving initiatives such as conveyor belt scheduling have been well received, though some workers expressed interest in clearer communication about how these changes contribute to overall GHG reduction goals. Electrical infrastructure monitoring at the 11kV substation provides real-time load and power factor data, supporting operational control and efficiency improvements. These measures collectively aim to reduce energy consumption and associated emissions, aligning corporate sustainability objectives and IRMA requirements.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Chapter 4.6 was partially audited during the surveillance audit. Auditing was focused primarily on three requirements from this chapter, including critical requirement 4.6.2.1, which was rated Substantially Meets at the initial audit. Progress on this critical requirement is summarized in Section 3.5.

A detailed baseline assessment for the entire area was completed in line with planned actions. The impact report, risk assessment and eDNA sampling was completed in 2024.

The mine re-developed the biodiversity strategy following the Anglo American divestiture, to focus on relevant topics for Valterra. The strategy is aligned with multiple national and international biological and biodiversity protocols. Mitigation hierarchy is a foundation concept. The revised strategy requires an update to the biodiversity impact and conservation assessment every 2 years.

Sign-off by leadership on mitigation hierarchy and a commitment to no mining in key (protected/no-go) areas for cultural or biodiversity interest is anticipated in 2026.

Bio-monitoring data outputs for water are used to inform the site's Adaptive Water Management Plan (AWMP). Key Performance Indicators (KPIs) include locations of sensitive (top) plant species, species counts (recent), biomonitoring trend analysis.

Valterra Platinum has contributed aircraft to National Parks for anti-rhino-poaching activity.

Chapter 4.7—Cyanide Management

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

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

Chapter 4.8—Mercury Management

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

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

5. Performance on Critical Requirements

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

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

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

5.1. Summary of Site Performance Changes in Critical Requirements

Table 5-1 Review of Ratings for Each Critical Requirement

Principle 1: Business Integrity

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

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

Principle 2: Planning for Positive Legacies

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
2.1.3.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.2.2.2	Not Relevant	Not Relevant	Evidence reviewed in this assessment confirms the previous rating.
2.4.7.1	Not Relevant	Not Relevant	Evidence reviewed in this assessment confirms the previous rating.
2.5.1.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
2.5.2.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
2.6.2.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
2.6.2.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Principle 3: Social Responsibility

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

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
3.5.1.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Principle 4: Environmental Responsibility

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
4.1.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.5.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
4.1.5.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.2.4.1.a-e	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
4.2.4.4	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5; outstanding actions described in Section 6.1.
4.3.2.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
4.5.1.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.
4.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.4.1	Substantially Meets	Fully Meets	Evidence reviewed in this assessment supports upgrading the rating, See Section 3.5.

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
4.6.5.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.4	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.7.7.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.2	Not Relevant	Not Relevant	This critical requirement is not applicable.

6. Next Steps

6.1 Corrective Action Plans

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

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

Principle 1 Outstanding Corrective Action

Critical requirement 1.1.1.1. – Compliance with Host Country Laws

The mine has implemented a verification process to confirm and evaluate completion of actions and is in the process of developing a dashboard for all assurance activities. Repeat findings and overdue actions were fewer than noted during the previous assessment. Verification of compliance status and in particular repeat compliance issues and overdue compliance related actions will continue during the next assessment.

Critical requirement 1.2.2.2. - Engagement Processes

Mototolo has developed a Local Accountability Strategy to support improved engagement with external stakeholders. It was noted that there are several conflict factors affecting engagement, including high levels of unemployment and marginalization, ineffective local government structures and perpetual conflicts between and within local political, community and traditional leadership. External stakeholders continue to express differing perspectives regarding engagement effectiveness, accountability, and responsiveness.

Critical requirement 1.3.2.1. - Assessment of Human Rights Risks and Impacts

The site has appointed an external consultant to undertake an additional Human Rights Impact Assessment for the operations' tailings storage facility inundation area. This process had been completed at the time of the surveillance audit, but the results had not yet been integrated into the site baseline WRAC.

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

The site has increased the awareness of bullying, harassment and victimization and anti-gender-based violence campaigns and training for workers and contractors on right to freedom

of association. Worker interviews have raised issues related to the rights of fixed-term workers, and instances of gender discrimination and harassment.

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

Mototolo has updated and rebranded its grievance process in September 2025. The revised process has not been in place long enough to fully evaluate its effectiveness. Further verification will be required at the next audit.

Principle 2 Outstanding Corrective Actions

Critical requirement 2.5.2.1. – Community and Worker Consultation

The Mototolo revised Emergency Management Plan (EMP) was reported to involve consultation with local communities, including Didingwe River Lodge, and Leshaba Community, however further engagement with external stakeholders to verify this will be needed at the next audit.

Principle 3 Outstanding Corrective Actions

Critical requirement 3.1.3.3. – Non-Discrimination and Equal Opportunity

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

Critical requirement 3.1.5.1. – Grievance Mechanism

Worker interviews indicated that there is still some reluctance to formerly raise grievances about superiors (e.g. supervisors), as this could lead to victimisation. In addition, mechanisms for raising anonymous grievances are still not widely known or trusted by workers, and especially contract workers as they feel “outside” of the mine’s systems and not protected. Contractors, especially at the Der Brochen site, expressed uncertainty about reporting processes and concerns about potential repercussions. Both employees and contractors reported limited awareness of whether grievances raised had led to investigations or corrective actions. The grievance mechanism process will be further reviewed during future assessments.

Critical requirement 3.2.4.1 - Measures to Protect Workers

The mine has completed the actions set in its corrective action plan from the initial audit, and no repeated issues were observed during the surveillance audit. However, new concerns were noted during the surveillance audit related to communication of risks and controls to workers and verification of effectiveness of controls. Further engagement will be needed to demonstrate that mine processes are uniformly effective in addressing risks across the operation.

Principle 4 Outstanding Corrective Actions

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

It was not clear what actions taken to ensure non-tailings storage facilities waste facilities are aligned with Best Available Technologies (BAT) / Best Available Practices (BAP) beyond hydrocarbon containment improvements. No structured plan for salvage yard or other waste facility upgrades was presented.

Critical requirement 4.2.4.4. - Monitoring and Adaptive Management

The mine developed and implemented a revised Adaptive Water Management Plan (AWMP), containing Trigger Action Response Plans (TARPs). However, the actions listed relevant to the various trigger levels still do not indicate timelines for completion.

6.2 Timing of Future Audits

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

6.3. Focus Areas for Next Audit

The fatal incident, which occurred at Borwa Shaft on 27 March 2026 following the completion of the surveillance audit, was not included in the scope of this report. The findings of investigations and any follow-up actions will be fully reviewed at the next renewal audit.

During the surveillance audit, progress was noted in addressing previously identified corrective actions. However, several gaps remain, particularly in relation to grievance mechanisms, contractor management, control of health and safety at work, external stakeholder engagement, community health and safety and emergency planning, human rights and community benefit sharing.

The mine has little direct oversight of contractor processes to ensure they are in place and utilized, for example whether grievances are appropriately managed by contractors. Further actions are required to evaluate the effectiveness of training and awareness programs, including monitoring workers' comprehension, freedom of association and assessing contractor compliance with worker rights obligations.

The need for further transparency and increased communication was raised by stakeholders during interviews, especially related to tailings storage facility (TSF) safety measures and frequency of updates on real-time air quality, noise and vibration monitoring data. The environmental health concerns raised in written stakeholder feedback, especially regarding dust and water contamination, will be investigated at the next full audit.

Future initiatives planned for 2026 include installation of bio-separator flushing systems for underground toilets, air quality monitoring technology and a biodiversity mitigation hierarchy.

Specific focus areas for external stakeholder engagement should include:

- Effectiveness and perceptions of external stakeholder engagement, including transparency and accountability of the mine (Chapter 1.2)
- Perceptions and impacts on community human rights impacts and effectiveness of site actions to address harassment and bullying (Chapter 1.3)
- Awareness and implementation of engagement protocols and grievance mechanisms (Chapter 1.4)
- Community involvement and awareness in emergency preparedness and planning (Chapter 2.5)
- Local employment, procurement, and shared benefits and community development (Chapter 2.3)
- Transparency and accountability in terms of sharing environmental information (Chapter 3.3)

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

Engagement with the Department of Mineral and Petroleum Resources (DMPR), which was initially identified as a follow-up item at the initial report but was not carried out at the surveillance audit, will also be prioritised at the renewal audit.

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

Appendix A: Revised Corrective Action Plan

The week of 23 Nov 2026, this document will be updated with Valterra Platinum's revised corrective action plan.