

MINE SITE ASSESSMENT PUBLIC SUMMARY REPORT

MINE SITE

Unki

OPERATING COMPANY

Anglo American Platinum

COUNTRY OF OPERATION

Zimbabwe

18 FEBRUARY 2021

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

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IMPORTANT NOTE ABOUT THIS AUDIT REPORT

There was one chapter that was not scored in this audit report (Chapter 3.4 on Mining and Conflict-Affected and High-Risk Areas), because IRMA identified it as needing additional guidance to facilitate the fair and consistent assessment of its requirements.

Additionally, there are a number of requirements in this audit report that were evaluated but not scored by SCS Global Services (SCS). These are requirements where the certification body identified the need for more detailed guidance, definitions, or information on scope of application to enable more consistent rating of the requirements (i.e., the goal being that different auditors should come up with the same rating based on review of the same evidence).

The chapter and requirements have been identified in the audit report as Not Scored, and they do not factor into the chapter or principle-level scores reflected in this report.

Within the body of the report and in the [Appendix](#), where ratings can be found on a requirement-by-requirement basis, they are identified with the following icon:



IRMA will develop more detailed guidance to address these issues in 2021, and the Unki mine will have these requirements assessed during its surveillance audit, which must take place within 12 - 18 months of the release of this report. At that time, Unki mine's scores will be updated.

Audit Details

Name of Mine:	Unki Mines (Private) Limited (Unki), Zimbabwe
Operating Company:	Unki Mines (Private) Limited (Unki), Zimbabwe
Mine Owner:	Anglo American Platinum Limited, a subsidiary of Anglo American plc
Country of Operation:	Zimbabwe
Mined Material(s):	Platinum, Palladium, Gold, Ruthenium, and Iridium
# Employees / contractors:	1,210 / 1,080 at the time of audit
Mine site profile on IRMA's Responsible Mining Map:	https://map.responsiblemining.net/site/76
Audit Type:	Initial Certification Audit
Audit Dates:	November 29 – December 7, 2019
Audit Team:	Warrick Stewart (Lead and Environmental Auditor), Craig Watt (Environmental Auditor), Paul Mitchell (Environmental and Occupational Health and Safety Auditor), Hilde van Vlaenderen (Social Auditor), Davidzo Muchawaya (Social and Labor Auditor), Jim Kuipers (Tailings and Waste Technical Expert), Mike de Koker (Occupational Health and Safety Technical Expert), Bora Arpacioğlu (Air Quality, Greenhouse Gas and Noise and Vibration Technical Expert).
Lead Auditor Declaration:	<p>✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers and stakeholders) as presented during the Stage 1 and Stage 2 audit activities.</p> <p>✓ The audit team members were deemed to have no conflicts of interest with the mine.</p> <p>✓ The audit team members were professional, ethical, objective and truthful in their conduct of audit activities.</p> <p>✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p>
Scope of Certification	Underground Platinum Group Metals (PGM) mine, concentrator, co-located smelter, tailings storage facility and associated infrastructure
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
Certification Body (CB):	SCS Global Services
CB Technical Reviewers:	Neil Mendenhall, Ambar Valles, Barnaby Briggs, Martin Hannigan, Carl Nicholas
Certification Decision date:	18 FEBRUARY 2021
IRMA Reference Number:	IRMA-STD-SCS-002-C-00001

1. Mine Site Overview

1.1. Overview of location

The Unki Platinum Mine (Unki) is an operational mine located on the Great Dyke in Zimbabwe, at Makomisa farm, 15 km east of the town of Shurugwi in the Midlands Province. It is located on the Chironde Hills, between the Umtebekwa and Umtebekwana Rivers.

Within a 25 km radius of the mine site there are several existing communities. It is surrounded by resettlement schemes and communal areas to the east of the Umtebekwana River and co-operatives on commercial farms to the south and west. The communities at villages 17 and 18 and the Impali residents were both resettled as part of the mine development process.



A map of Unki Mine's locality is provided below in Figure 1.

1.2. Overview of operation

The platinum-group elements (PGE) containing ore body is contained in a layer called the Main Sulphide Zone, which occurs near the uppermost layers of the Great Dyke. There are two incline shafts, 25 m apart on the eastern side of Chironde hill, dipping westwards at approximately 7 degrees and following the platinum ore zone to a depth of 300 m. The southern incline is for men and materials and the northern incline for raising the ore and waste rock to the surface by conveyor belt. Waste rock is disposed of at a waste rock dump to the immediate north-west of the concentrator.

The ore body is extracted using a mechanized bord and pillar mining method achieving planned stope widths of 2.04 m. The mine design comprises sections consisting of 6 bords and 1 strike belt for ore conveyance to the main conveyor decline. A new section design of 9 bords and 1 strike belt is currently being implemented in the shallow dipping areas of the orebody. An average monthly production of 147 kt is produced from the underground stopes. Surplus ore is stockpiled on surface.

The Unki concentrator has a primary and secondary mill, which feed in the milled material to a flotation circuit. A filter concentrate cake is an end-product which is collected at the larox filter. All tailings residue is pumped to the tailings storage facility (TSF) during processing. The TSF is

located approximately 1.6 km from the concentrator. A debottlenecking project is underway to improve processing capacity above 180 ktpm.

The smelter is designed to process 62 ktpa of concentrates. The matte produced is sent to South Africa for further processing.

The Unki mining lease area comprises 10,380 ha of which 260 ha is disturbed by surface infrastructure.

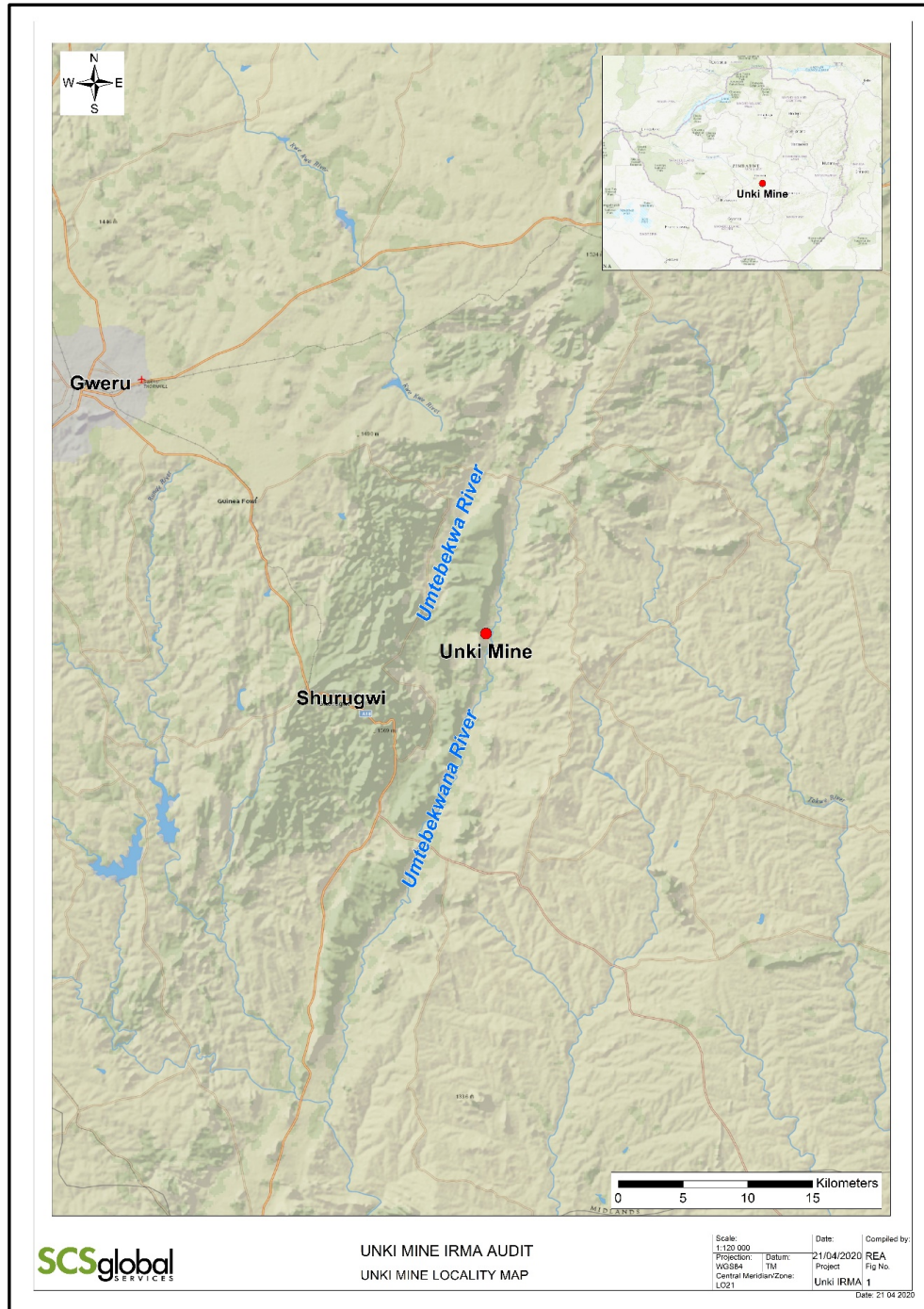


Figure 1: Locality of the Unki Mine, Zimbabwe.

2. Mine Site Assessment Process

2.1. Overview of IRMA Process

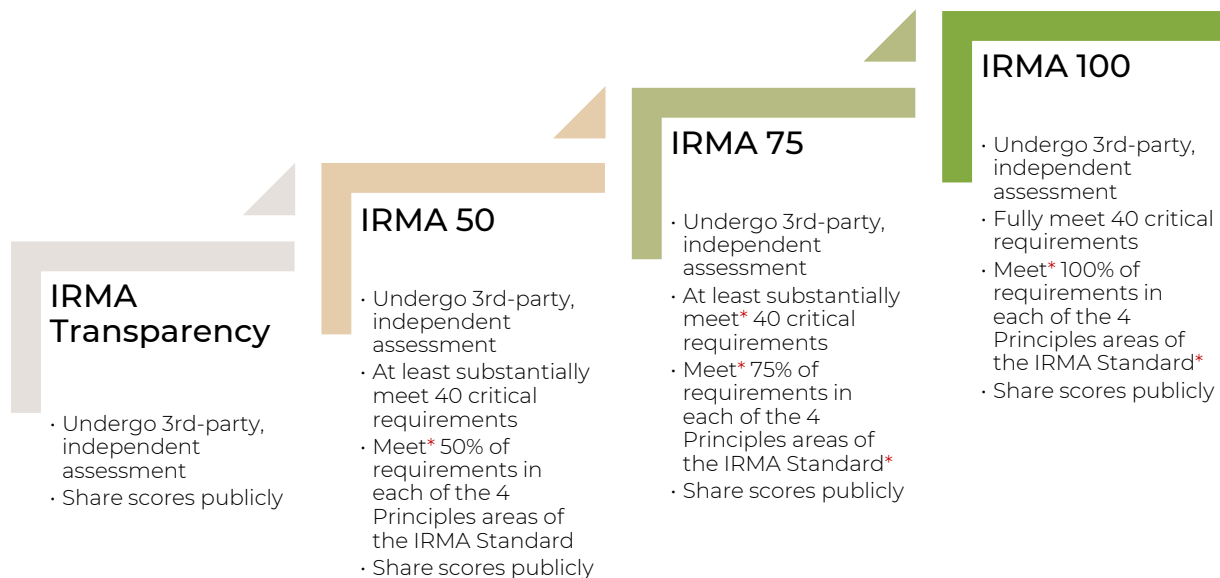
The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).¹ When the self-assessment has been completed, the independent, third-party assessment may begin.

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

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

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

IRMA recognizes four levels of achievement. For a complete description of the assessment process and achievement levels, see IRMA's Certification Body Requirements, available on IRMA's web site.²



* Some minor non-conformance allowed as long as there is a timebound corrective action plan to come into full compliance.

2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining (v.1.0)³ by external auditors. Audits are conducted by auditors who: have undergone IRMA training, meet IRMA competency requirements and have been deemed to have no conflicts-of-interest with the mine site under assessment.⁴

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).⁵ In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

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

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

2.1.2. IRMA Complaints Process

If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the IRMA website.⁶ Details on the complaints process can be found in IRMA's Issues Resolution Procedure.⁷

2.2. Audit Process and Timeline

- Anglo American Platinum completed the initial self-assessment for Unki in October 2019.
- SCS Global Services carried out an initial Stage 1 desktop audit in October – November 2019.
- SCS Global Services conducted a Stage 2 on-site audit in December 2019.

The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, governmental agencies, documentation review and visit to operational areas including underground mine workings, mine site offices, workshop, concentrator, smelter, stockpile, slag pile, tailings storage facility, raw water treatment facility, sewer plant, landfill, leachate ponds, pollution control dam, engineering stores, salvage yard, fuel storage, Lucilla Poort dam, management and Nyathi camps, and select air and water quality monitoring sites. Community sites were also observed for the resettlement sites of Village 17 and 18 and Impali, and the Pasimupindu community.

2.3. Stakeholder Engagement

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

2.3.1. Written comments/inquiries

Stakeholders were notified at least thirty (30) days prior to the audit date; however, no inquiries were received. Stakeholder outreach was conducted via SMS, newspaper announcements and posters placed in community centers within the nearby towns. Additionally, no comments were recorded via the SCS website public notification.

2.3.2. Mine Staff

The responsible personnel fulfilling the positions/roles listed below were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

Position/Role
Finance Manager
Procurement Manager
Head of Sustainability, Corporate Affairs, Anglo American Platinum Ltd
Social Performance Manager
Social Performance Clerk
Social Performance Officer
Social Performance Assistant
Chief Safety Officer
Environmental Coordinator
Protection Services Manager Operations
Protection Services Superintendent
Engineering Manager
Civil Engineer
Environmental Assistant
Mineral Resource Manager
MRM Systems Administrator
Chief Geologist
Permitting Officer

Senior HR Manager

Plant Production Manager

Process Manager

Senior Specialist LFI and Assurance

2.3.3. Workers/Contractors

Interviews were conducted December 4 to December 5, 2019 with both permanent and contract Unki employees, key community, government, and other stakeholders. Interviewees included a cross-section of roles, gender, ages, as well as the union/worker representative affiliations representing the scope of operations from the mine, concentrator, smelter, tailings storage facility and associated infrastructure.

Mine	26 permanent workers 11 contractors
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2.3.4. Government Institutions

Interviews were conducted with the following public sector institutions on 4 and 5 December 2019:

Government Institution

Environmental Management Agency (EMA)

Ministry of Mines and Mining Development

Shurugwi Town Council

Gweru City Council

Tongogara Rural District Council

District Administrator (Shurugwi)

Zimbabwe Republic Police (ZRP)

Department of Labor

Department of Irrigation

Ministry of Health (Shurugwi)

District Development Fund

Local chiefs (Nhema, Ndanga and Banga)

Ward 20 Councillor

Ward 18 Councillor

2.3.5. Participating Communities and NGOs

Interviews were conducted with approximately 120 external community stakeholders on 4 and 5 December 2019. The community interviews included a cross-section of members including men, women, youth and vulnerable groups where practically possible.

Additionally, three local chiefs were interviewed (see Government table, above), two nurses from local health clinics (Ward 20 and Chironde) were interviewed, and meetings were held with the Shurugwi Community Development Trust (SCDT) and Tongogara Rural District Community Ownership Trust.

Community Name	Total Number of Attendees
Rietfontein	15 (8 women, 6 men, 1 child)
Ward 20	20 (7 women, 13 men)
Village 17	14 (7 women, 7 men)
Pasimupindu	70 (24 women, 42 men, 4 children)

2.4. Summary of Mine Facilities Visited

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

Operational areas	Underground mine workings, Mine site offices, workshop, concentrator, smelter, stockpile, slag pile, tailings storage facility, raw water treatment facility, sewer plant, landfill, leachate ponds, pollution control dam, engineering stores, salvage yard, fuel storage, Lucilla Poort dam, management and Nyathi camps, and select air and water quality monitoring sites.
Surrounding Communities	Rietfontein, Ward 20, Village 17 and the Pasimupindu community.

3. Summary of Findings

Detailed audit findings on a requirement-by-requirement basis can be found in [Appendix 1](#).

3.1. Audit outcome

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

As mentioned in the [Note](#) on page 5 (and table below), there was one chapter that was not scored, as well as some additional requirements. They will be audited at the Unki mine surveillance audit (See [Section 4.3](#)).

3.2 Scores by IRMA Standard principle and chapter

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 1: Business Integrity		70	88	80%
Chapter 1.1—Legal Compliance	Yes	9	12	75%
Chapter 1.2—Community and Stakeholder Engagement	Yes	15.5	16	97%
Chapter 1.3—Human Rights Due Diligence	Yes	11	16	69%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	19.5	20	98%
Chapter 1.5—Revenue and Payments Transparency	Yes	15	24	63%
Principle 2: Planning for Positive Legacies		48.5	64	77%
Chapter 2.1—Env/Soc Impact Assessment and Management	Yes	12.5	22	57%
Chapter 2.2—Free, Prior and Informed Consent	No	—	—	—
Chapter 2.3—Community Support and Benefits	Yes	3	4	75%
Chapter 2.4—Resettlement	Yes	1.5	2	75%
Chapter 2.5—Emergency Preparedness and Response	Yes	9.5	10	95%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	22.5	26	87%
Principle 3: Social Responsibility		153	168	91%
Chapter 3.1—Fair Labor and Terms of Work	Yes	56	60	93%
Chapter 3.2—Occupational Health and Safety	Yes	43.5	46	95%
Chapter 3.3—Community Health and Safety	Yes	17	18	94%
Chapter 3.4—Conflict-Affected and High-Risk Areas	NS**	NS	NS	NS
Chapter 3.5—Security Arrangements	Yes	27.5	30	92%
Chapter 3.6—Artisanal and Small-Scale Mining	Yes	5	8	63%
Chapter 3.7—Cultural Heritage	Yes	4	6	67%

Principle 4: Environmental Responsibility		99	130	76%
Chapter 4.1—Waste and Materials Management	Yes	45.5	50	91%
Chapter 4.2—Water Management	Yes	19	26	73%
Chapter 4.3—Air Quality	Yes	16	18	89%
Chapter 4.4—Noise and Vibration	Yes	2	2	100%
Chapter 4.5—Greenhouse Gas Emissions	Yes	6.5	14	46%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	10	20	50%
Chapter 4.7—Cyanide Management	No	—	—	—
Chapter 4.8—Mercury Management	No	—	—	—

* Chapters are marked as Not Relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site.

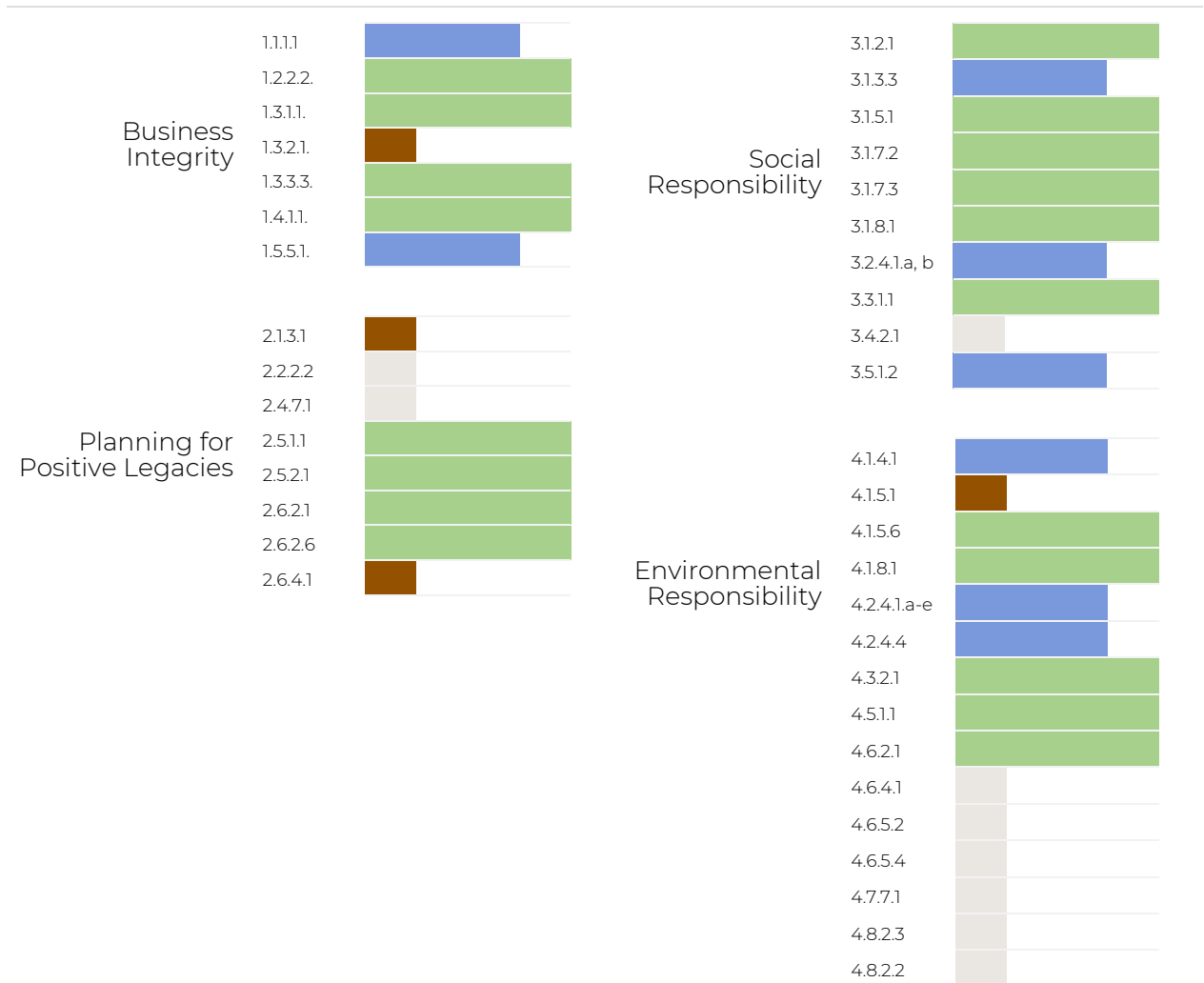
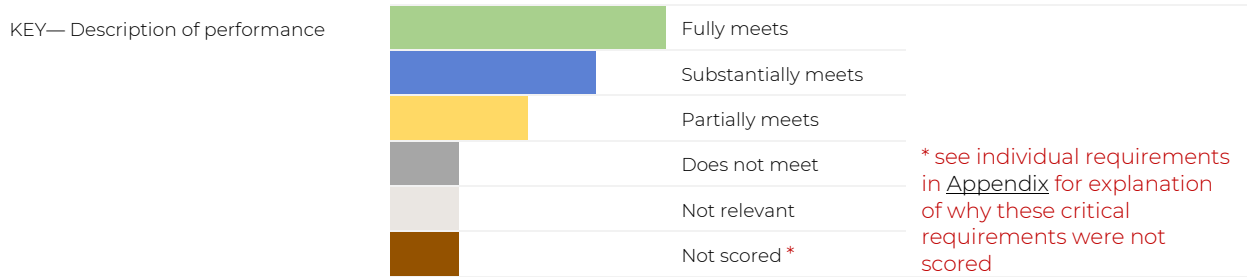
** Chapter 3.4 is marked as Not Scored (NS) because IRMA is working on updated Guidance for Chapter 3.4. The Guidance will be applied at the mine's surveillance audit, and Unki will be scored on the chapter at that time.

Chapters deemed Not Relevant or Not Scored do not factor into the principle-level scores.

3.3. Performance on critical requirements

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




3.3.1. Snapshot of performance on 40 critical requirements










3.3.2. Performance on 40 critical requirements.

RATING LEGEND









Description of performance

	Fully meets	
	Substantially meets	
	Partially meets	
	Does not meet	
	Not relevant	
	Not scored *	* see individual requirements in Appendix for explanation of why these critical requirements were not scored

Principle 1: Business Integrity

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

Principle 2: Planning for Positive Legacies

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

Principle 3: Social Responsibility

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

Principle 4: Environmental Responsibility

4.1.4.1.	A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities.	
4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices.	
4.1.5.6.	The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities.	
4.1.8.1.	The mine does not use riverine, submarine or lake disposal for mine wastes.	
4.2.4.1.a-e	Water quality and quantity are being monitored at the mine site	
4.2.4.4	and adverse impacts resulting from the mining operation are being mitigated.	
4.3.2.1.	When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan.	
4.5.1.1.	There is a policy being implemented that includes targets for reducing greenhouse gas emissions.	
4.6.2.1.	The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas	
4.6.4.1.	and these impacts are being mitigated and minimized.	—
4.6.5.2.	New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves	—
4.6.5.4.	and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized.	—

4.7.1.1.	Gold or silver mines using cyanide are certified as complying with the Cyanide Code.	—
4.8.2.3.	Mercury wastes are not permanently stored on site without adequate safeguards,	—
4.8.2.2.	are not sold or given to artisanal or small-scale miners and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories.	—

4. Next Steps

4.1 Corrective Action Plans

Unki Mining Operation prepared a Corrective Action Plan to address non-conformities with critical and other requirements, with the goal of improving performance.

4.2 Disclosure of Summary Audit Report

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

Unki Mine's public summary report will be posted on the IRMA website, and on the Unki Mine's profile on the Responsible Mining Map.⁸

4.3 Timing of Future Audits

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

During the 12-month period Unki implemented a series of corrective actions to address non-conformities and meet IRMA 75.







Unki mine's surveillance audit must occur within the next 18 months.

APPENDIX—Results by Requirement

Principle 1: Business Integrity

RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant
	Not scored

Chapter 1.1—Legal Compliance	Basis for rating
<p>1.1.1.1. Critical The operating company shall comply with all applicable host country laws in relation to the mining project.</p>	<p>Areas of non-conformances with the requirements included:</p> <ul style="list-style-type: none"> - Signed incidents register 311019.pdf point 5 - uncontrolled release from pollution control dam (PCD) to Umtebekwana River. No remedial action implemented regarding pollution of river, only to Concentrator Plant, rehabilitation of community boreholes, Human Performance Improvement (HPI) review and lessons learned documented. Zimbabwe's Environmental Management Agency (EMA) was notified of this breach. - Settling pond constructed below tailings storage facility (TSF), but not all 3 in series as required by EMA and as per engineering design. No current actions being implemented to remedy this. <p>The following are notes indicating areas of conformance with this requirement.</p> <ul style="list-style-type: none"> - EMA undertakes inspections before permits are issued. EMA undertake classification of performance based on EMA's own monitoring. - TSF had no settling pond pre-2016. Unki have to periodically discharge effluent from the TSF if the integrity of the TSF is under risk during high rainfall events. Effluent was discharged in 2016. EMA required sampling and to be advised of proposed discharge prior to discharge event. EMA instructed Unki of the need to construct settling ponds. Settling ponds constructed in 2016. Correspondence from EMA in October 2017 regarding requirements needing to be met for future discharge (e.g. environmental management plan (EMP), monitoring etc.) provided by Unki. - Legal register and tracking is all being pulled into a new IT tool by Unki to help trigger actions to

	<p>fulfil permit and license submission and renewal processes.</p> <p>There are a number of permits which are soon to expire or which are in process of renewal. These do not count as non-conformances but should be noted for review in future audits.</p> <ul style="list-style-type: none"> - Ver 06- Unki occupational health and safety (OHS) Register 2019.doc has not been updated in terms of compliance verification since March 2017. - Solid waste disposal license for TSF expired on 31 December 2018, and not been renewed yet. Invoice provided by EMA on 17 December 2018. Application submitted on 28 January 2019 and stamped as received by EMA, but permit not received yet. - SR & KV claims due to expire on 19 January 2020. Shown receipt of payment for next 3 years (paid 2 years in advance to avoid price escalations). Unki is waiting the certificate. - Sand and Clay Extraction License- Umtebekwana River site, Sand and Clay Extraction Licence- Hwinya Village, and Sand and Clay Extraction License- Chironde Village 5 due to all expire on 31 December 2019. Lead time of 3 months allocated. Application for Umtebekwa River sand abstraction application submitted on 18 February 2019 and stamped as received by EMA on 19 February 2019. A copy of proof of payment could not be provided, as Unki requires an invoice before they can make payment, so they are currently awaiting this. - Registration of Health Institution Certificate expires 31 December 2019. Unki requested an invoice to enable payment, to facilitate the process (correspondence not been provided yet by Unki). - Environmental Impact Assessment Certificate - Housing Project (4232) expired on 30 June 2019. Unki applied for a renewal, but they have not received it yet.
<p>1.1.2.1. The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.</p>	<p>—</p> <ul style="list-style-type: none"> - No known conflict by Unki between host country and IRMA requirements. - Permit requirements regarding water and waste were extensively reviewed and no non-compliance found, despite initial indications that this may have been an issue re: discharges from the TSF, PCD and wastewater treatment works (WWTW). - Has been non-compliance with national labor law, but this does not present a conflict between national and IRMA requirements.
<p>1.1.3.1. If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring.</p>	<p>⊕</p> <ul style="list-style-type: none"> - Remedial actions not implemented yet regarding contravention of PCD uncontrolled release and design parameters of settling pond below TSF. - Signed incidents register 311019.pdf point 5 - uncontrolled release from PCD to Umtebekwana River. No remedial action regarding pollution of the river has been implemented, only to the Concentrator Plant, rehabilitation of community boreholes, and HPI review and lessoned learnt






		<p>have been documented. Zimbabwe EMA was notified.</p> <ul style="list-style-type: none"> - Settling pond constructed below TSF, but not all 3 in series as required by EMA and as per engineering design. No current actions being implemented to remedy this. Given there are 2 instances of legal non-conformity, one which is not yet addressed in any way, we must grant a "Partially Meets".
1.1.4.1.	The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project.	<ul style="list-style-type: none"> - The relevant procedure does not include IRMA requirements, only Zimbabwe legal and Anglo policy requirements for most chapters, but IRMA OHS requirements are well reflected. - Certain provisions are in place to inform Contractors and Business Partners of the requirements of this Procedure (albeit that it does not address IRMA requirements beyond OHS), but Unki could not evidence of when and how this happens.
1.1.5.1.	The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard.	<ul style="list-style-type: none"> - All legal requirements are reflected in a single legal register, but all of these are only for Zimbabwean legal requirements. - However, the OHS register has not been updated in terms of compliance verification since March 2017. - No evidence provided of IRMA requirements being recorded and documented but given that this is an initial verification audit there are limitations to them having a tracking system in place now based on an independent evaluation of their performance against IRMA.
1.1.5.2.	Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors, and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies.	<ul style="list-style-type: none"> - Records related to compliance and non-compliance provided as requested.
1.1.5.3.	Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available.	<ul style="list-style-type: none"> - Complaints or requests regarding legal compliance issues are channeled to the Community Relations Department. An investigation is then undertaken, a report compiled, and results are shared with the stakeholder. - Unki confirmed in writing that they self-report regulatory non-compliance incidents to the relevant authorities. Public disclosures are made through the Community Engagement Forum (CEF). The regulatory non-compliance incidents are also captured in the Social Incidents and Grievance Register that is shared with the CEF and internally reported through Enablon.
1.1.5.4.	Where the operating company claims that records or documentation contains confidential business information, it shall: <ul style="list-style-type: none"> a. Provide to auditors a general description of the confidential material and an explanation 	<ul style="list-style-type: none"> - None of the information requests or grievances have been of a confidential nature.

<p>of the reasons for classifying the information as confidential; and</p> <p>b. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information.</p>	
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Chapter 1.2—Community and Stakeholder Engagement

Basis for rating






1.2.1.1.	The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki’s surveillance audit.
1.2.1.2.	A stakeholder engagement plan scaled to the mining project’s risks and impacts and stage of development shall be developed, implemented and updated as necessary.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki’s surveillance audit.
1.2.1.3.	The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups).	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki’s surveillance audit.
1.2.1.4.	The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or mitigate community conflicts that might otherwise occur as a result of company engagement processes.	✔	The interview with the site Social Performance (SP) team revealed that they have knowledge of the local dynamics in the community and that these are taken into account in the stakeholder engagement (i.e. dynamics between the various chiefs, dynamics with illegal artisanal miners etc.). The most recent social baseline available for review was of 2016.
1.2.2.1.	Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning)	✔	Stakeholder engagement has been consistent and ongoing with the community as evident through the 2019 Stakeholder engagement plan, Community engagement perception survey report 2019, CEF procedure 2015, newsletters (e.g. newsletter first quarter 2018), CEF quarterly meetings, minutes of issue-based meetings with communities (e.g. meeting of 14 February 2019 on gravel extraction), interview with SP team, meetings with the communities of Rietfontein, Village 17, Pasimupindu, and interviews with chiefs Nhema, Ndanga and Banga during the audit.
1.2.2.2.	<p>Critical The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <p>a. Providing relevant information to stakeholders in a timely manner;</p>	✔	Meetings with the communities of Rietfontein, Village 17, Pasimupindu and chiefs Nhema, Ndanga and Banga and the interview with SP team provided evidence that in general, information is provided to stakeholders (e.g. awareness campaigns around the impacts of the





<ul style="list-style-type: none"> b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account. 		<p>smelter with communities and the Community Engagement Forum (CEF)), that Unki management and subject matter specialists attend stakeholder meetings where relevant (e.g. project engineer attended a community meeting with regards to the gravel extraction activity), that Unki solicits feedback from stakeholders (e.g. community meetings regarding the smelter) and provides them with feedback on how they have taken their input into account (e.g. feedback on social incidents and grievances during quarterly CEF meetings).</p>
<p>1.2.2.3. The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project's environmental and social performance, and/or input to the company on issues of concern to stakeholders.</p>		<p>Unki has collaborated with local stakeholders to develop the Community Engagement Forum.</p>
<p>1.2.2.4. Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives.</p>		<p>CEF members and local community stakeholders interviewed during the audit agreed that the stakeholder engagement mechanisms were culturally appropriate and generally inclusive (men, women and vulnerable groups are included). A comment was made however that minutes of meetings are in English and should also be made available in the local language, and the results of the air pollution and the water pollution were not well explained to the Pasimupindu community.</p>
<p>1.2.2.5. When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether or not such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community.</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.2.2.6. The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.</p>		<p>The CEF and other stakeholder meetings and the grievance and social incidents analysis show the names of the participants, their inputs and the responses from Unki.</p>
<p>1.2.2.7. The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes.</p>		<p>The minutes of the meetings with the CEF and community meetings show evidence of feedback on issues raised during previous meetings. The grievance and social incidents procedure is designed to provide feedback to aggrieved stakeholders throughout the process of receiving the grievance until the close out. Community engagement perception survey of 2019 and</p>

		<p>interviews with stakeholders indicated that Unki generally feeds back on issues raised. There were some comments about lack of feedback on issues in Pasimupindu and Chironde.</p> <p>There currently isn't a register being maintained that clearly outlines all issues raised and the feedback provided, which is then shared with stakeholders.</p> <p>While these are shortcomings indicating that more feedback could be provided to some groups, feedback IS being provided. There is no requirement about comprehensiveness in feedback provided or the mechanism used to provide feedback, and so we award a "Fully Meets".</p>
<p>1.2.3.1. The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement.</p>	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.2.4.1. Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information.</p>	<p>☑</p>	<p>From the data reviewed (minutes of meetings) and the interviews held, there is evidence that issues related to the mine that impact on stakeholders are shared with stakeholders. Ward 20 representatives however complained about lack of information about the mine and are not represented on the CEF.</p> <p>Unki has a system in place to make information publicly available upon request.</p>
<p>1.2.4.2. If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested.</p>	<p>—</p>	<p>There is no evidence of requests for information being deemed unreasonable.</p> <p>Efforts are made by the operating company to provide stakeholders with overview/summaries of information requested. From the data reviewed by the auditors (minutes of meetings) and the interviews held, there is evidence that issues related to the mine that impact on stakeholders are shared with stakeholders. Unki has a system in place to make information publicly available upon request.</p>
<p>1.2.4.3. Communications shall be carried out and information shall be provided to stakeholders in a timely manner, and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders</p>	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.2.4.4. If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information.</p>	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>

Chapter 1.3—Human Rights Due Diligence

Basis for rating

<p>1.3.1.1. Critical The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights</p>		<p>The two documents state the commitment to international human rights, including the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, Declaration on Fundamental Principles and Rights at Work, Voluntary Principles on Security and Human Rights (VPSHR), and United Nations Guiding Principles on business and human rights.</p>
<p>1.3.1.2. The policy shall:</p> <ol style="list-style-type: none"> Be approved at the most senior level of the company; Be informed by relevant internal and/or external expertise; Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project; Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders; Be reflected in the mining project's operational policies and procedures. 		<p>The policy is approved at the highest level in the company (Anglo American corporate) and publicly available. The policy is communicated to partners and contractors through their contract commitments. The human rights (HR) principles are carried through in a suite of policies including, anti-harassment, health and safety, clean environment and anti-corruption. These are advertised throughout the mine and are visible to workers. The HODs were trained in HR in 2016. There is however no overarching document that sets out how the HR policy is operationalized by Unki, with references to the various policies. Therefore e) is not met.</p>
<p>1.3.2.1. Critical The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.3.2.2. Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:</p> <ol style="list-style-type: none"> Follow a credible process/methodology; Be carried out by competent professionals; and Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. 		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.3.2.3. As part of its assessment, the operating company shall document, at minimum:</p> <ol style="list-style-type: none"> The assessment methodology; The current human rights context in the country and mining project area; Relevant human rights laws and norms; 		<p>Only a) and f) can reasonably be audited given IRMA's current guidance.</p> <p>Unki has a risk and impact matrix that includes some human rights impacts and risks. There are recommendations for preventing, mitigating and remediating impacts. The salient human rights are not prioritized in the risk matrix. These risks are</p>

		<p>d. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk;</p> <p>e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group;</p> <p>f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues.</p>
<p>1.3.2.4. At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them, and shall be consulted to provide feedback on those findings.</p>		<p>There is no evidence of involvement of stakeholders in the development and review of the HRDD report. There are regular meetings with the Community Engagement Forum (CEF) which touch on human rights impacts and mitigation, but these stakeholders haven't been engaged in the development of a comprehensive human rights impact assessment.</p>
<p>1.3.2.5. The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level.</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.3.3.1. Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights.</p>		<p>A grievance procedure exists that can accommodate human rights risks. Communities engaged during the audit were aware of the grievance procedure.</p>
<p>1.3.3.2. Responding to human rights risks related to the mining project:</p> <p>a. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s).</p> <p>b. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks.</p> <p>c. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or</p>		<p>Unki has mitigation measures in place for risks (including human rights risks) they identified in the HRDD and their annually updated risks and impacts tracker. While Unki does have systems in place to identify and manage human rights risks (which were strengthened post-audit in 2020 with the launch of Anglo American's Social Way V3.0), there were residual risks capable of causing, contributing or being linked to human rights impacts for which there are not fully IRMA-compliant preventative or mitigation measures in place (although it should be noted that there was no evidence of these risks materializing). These are outlined below:</p> <ul style="list-style-type: none"> - Risk of contributing to the failure of the Tailings Storage Facility (TSF) control dam wall. An independent review of the TSF was conducted in 2016 and the next one is planned for early 2020. It is indicated in the Operating Manual for Hazardous Management Facility that annual inspections are required by an independent

mitigate their risks to human rights from their activities.

person in the presence of the landfill manager and operations manager.

- There is a risk of contributing to a breach of human rights linked to the potential of seepage or partial/complete failure of the Tailings Storage Facility (TSF) (4.2.2.3). Water discharges from the mine operations to receiving water are assessed by the University of Zimbabwe in accordance with Zimbabwean legal requirements. These reports suggest that there are problems with turbidity & suspended solids, conductivity and total dissolved solids, phenolic compounds, chemical oxygen demand and fluoride. There is no comparison of water quality against IRMA guideline requirements. There are also questions around the capability of Zimbabwean laboratories to meet international guideline requirements due to limitations with analysis equipment and detection levels. The auditor has not seen an overall water management plan for the mine. However, the mine does have an EMP prepared in 2003 and the management of water related issues for the Raw water supply, TSF, Pollution Control Dam, slag dump, hazardous landfill and stormwater system are being addressed in separate reports.

- There is a risk of causing a breach of human rights related to the lack of a comprehensive due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force. Agreements with security service providers outline procedures such as screening of security guards for criminal records before hiring. However, the procedures are not comprehensive (3.5.3.1).

- There is a risk of causing a breach of human rights related to Unki lacking a full evaluation of public security personnel providing services to the mine who been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force (3.5.3.2).

- There is a risk of causing a breach of human rights related to Unki only providing training on human rights to police officers who come to its site during the sampled period (January 2018- November 2019). The training did not include the appropriate use of force and firearms. Unki does not provide training to any Zimbabwe Republic Police Officers beyond those who enter the mining site (3.5.4.2).

- There is a risk of causing a breach of human rights related to Unki's procedures for documenting and investigating security incidents (3.5.5.1).

- The procedure does not take appropriate actions to mitigate and provide remediation for human

	<p>rights impacts, injuries or fatalities caused by security providers.</p> <ul style="list-style-type: none"> - The procedure does not include reporting of security incidents, including credible allegations of human rights abuses by public security providers to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings. - The procedure does not include the requirement to provide medical assistance to all injured persons, including offenders. - The procedure does not have a requirement to ensure the safety of victims and those filing security-related allegations. - Unki risks contributing to adverse human rights impacts linked to the Voluntary Principles on Security and Human Rights (VPSHR). Section 8, 6th paragraph states that as part of implementing the Voluntary Principles, Anglo Platinum will seek, within its sphere of influence, to draw upon a wide range of stakeholder groups in carrying out an annual security risk assessment, facilitated by the Group Protection Services Advisor. Currently, Unki does not involve stakeholders identified from local communities in the development or review of the security risk assessment. The Voluntary Principles on Security and Human Rights (VPSHR). Section 8, 7th paragraph states that security risk assessments will be conducted every quarter. Currently, the risk assessment is only being conducted and reviewed annually (3.5.2.1). - Unki risks being linked to adverse human rights impacts in relation to its Human Rights Policy and the Voluntary Principles on Security and Human Rights (VPSHR) Policy. - The policies have not yet been communicated to identified stakeholders from local communities. Interviewed stakeholders from Village 17, Pasimupindu, Ward 20 and Rietfontein reported that they are not aware of the human rights policy and the Voluntary Principles on Security and Human Rights Policy (3.5.1.1). - Unki security risks and potential human rights impacts do not draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups and relevant stakeholders (3.5.2.2). - Unki does not report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights (3.5.6.3).
<p>1.3.3.3. Critical Responding to actual human rights impacts related to the mining project:</p> <ul style="list-style-type: none"> a. If the operating company determines that it has caused an actual human rights impact, the company shall: 	<p>Responding to actual human rights impacts related to the mining project: The Anglo American Group has over-arching policies regarding Human Rights, including the need for due diligence. A significant Human Rights impact at Unki was the resettlement of communities in 2002, but this was before the IRMA deadline of 2006. A Resettlement</p>

<ul style="list-style-type: none"> i. Cease or change the activity responsible for the impact; and ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders; b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact; c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships. 		<p>Action Plan, including Livelihood Restoration Plans, was drawn up at the time, implemented and has been closed out.</p> <p>Dialogue and stakeholder engagement with impacted communities, including human rights, has been maintained and is evidenced.</p> <p>Where Government support has been slow, Unki mine has implemented projects to improve services such as access to water and healthcare.</p> <p>There has been conversation with community leaders about Unki seeking to work in partnership, rather than taking on the role of Government.</p> <p>Evidence is provided of local government support for the actions of Unki mine on Human Rights, along with community leaders' participation in dialogue processes.</p> <p>Training on human rights has been provided at the mine, and human rights issues are integrated into ongoing management processes such as the Operational Risk Management (ORM) Workplace Risk Assessment and Control (WRAC) and the ongoing stakeholder engagement processes.</p> <p>The inclusion of human rights issues in the WRAC allows issues like road safety and water pollution - both identified as potentially having detrimental impacts - to be managed with a human rights mindset as part of everyday business at the mine.</p> <p>Therefore, the finding for this criterion is 'Fully Meets'.</p>
<p>1.3.4.1. The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.</p>	○	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>1.3.4.2. External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:</p> <ul style="list-style-type: none"> a. The company shall fund the external monitoring; and b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. 	—	<p>Neither Unki nor its stakeholders have identified a need for external monitoring of its human rights due diligence.</p>
<p>1.3.5.1. The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate</p>	⊗	


	and/or remediate the human rights risks and impacts.		
1.3.5.2.	If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations.	—	Auditee does not meet 1.3.5.1, therefore 1.3.5.2 is not relevant.
1.3.5.3.	Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization.	—	Auditee does not meet 1.3.5.1, therefore 1.3.5.3 is not relevant.

Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy

Basis for rating




1.4.1.1.	Critical The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as "stakeholders") have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.	✓	There is a clearly outlined grievance mechanism and materials in place to communicate this mechanism to stakeholders. Stakeholders and staff have been informed of the mechanism and understand the mechanism.
1.4.2.1.	The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum: <ul style="list-style-type: none"> a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue; b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase; c. How confidentiality of a complainant's identity will be respected, if requested; d. The ability to file anonymous complaints, if deemed necessary by stakeholders; e. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups; f. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate 	●	The grievance procedure is based on the Anglo America corporate procedure. The procedure has been discussed and agreed with the Community Engagement Forum (CEF) and has been discussed with local stakeholders. In the interviews with communities during the audit, no complaints about the grievance mechanism were received. There are several ways of lodging a grievance, including anonymously. Stakeholders are aware that they can appeal to an Unki resolution of a grievance and have recourse to other means of dealing with grievances besides the Unki grievance mechanism. Local stakeholders are however not clear on the difference between a request and a grievance and do not fully understand why their requests are not treated as grievances. No specific capacity building undertaken for stakeholders on the difference between requests and grievances.

	for handling serious human rights grievances; and g. How complaints and grievances and their resolutions will be tracked and recorded.		
1.4.2.2.	The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available.	✓	Incident and grievances are recorded and shared with the CEF, the record of a particular grievance is also shared with the aggrieved person. Additionally, procedures are discussed and agreed with the Community Engagement Forum (CEF), as well as with local stakeholders.
1.4.3.1.	No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.	✓	The social incident and grievance procedure allows access to means to settle grievances other than the mining company grievance procedure.
1.4.4.1.	Complaints and grievances and their outcomes and remedies shall be documented.	✓	The grievances and incidents are recorded and the procedure for managing the records and those responsible for it are documented.
1.4.4.2.	The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine: a. If changes need to be made to improve its effectiveness as per 1.4.2.1.a; b. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and c. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights.	✓	There have been updates of the grievance procedure based on corporate policies and there have been analyses of the incidents to assess if management measures are appropriate. There is evidence that local communities believe that Unki deals well with grievances.
1.4.4.3.	Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism.	✓	The grievance and incidents procedure is regularly updated with input from the CEF, updates of the grievance mechanism are communicated to community stakeholders for comment.
1.4.5.1.	The operating company shall take reasonable steps to inform all stakeholders of the existence of the operational-level complaints and grievance mechanism, its scope, and its procedures.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
1.4.5.2.	The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies.	✓	The procedure states that the use of the Unki grievance mechanism does not preclude other means of dealing with grievances.
1.4.5.3.	The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances, and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous.	✓	The interview with Social Performance (SP) team indicated that all grievances are directed to the social performance manager or the HR manager and that other managers and the members of her SP team are informed about the procedure. Some training has taken place to inform all managers.

1.4.6.1. Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances.		Grievances and grievance resolutions are regularly reported to stakeholder in the CEF meetings, as well as also shared with the aggrieved person.
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Chapter 1.5—Revenue and Payments Transparency

Basis for rating

1.5.1.1. The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime.	—	See 1.5.1.2 and 1.5.1.3.
1.5.1.2. On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year.		
1.5.1.3. The types of payment disclosed shall include as a minimum, as applicable: <ul style="list-style-type: none"> a. The host government's production entitlement; b. National state-owned enterprise production entitlement; c. Profits taxes; d. Royalties; e. Dividends; f. Bonuses, such as signature, discovery and production bonuses; g. License fees, rental fees, entry fees and other considerations for licenses and/or concessions; h. Payments for infrastructure improvements; and i. Any other significant payments and material benefits to government, including in kind payments. 		<ul style="list-style-type: none"> - Disclosure on Anglo Platinum website of support for and application of Extractive Industries Transparency Initiative (EITI). - The headline requirements are met for some of the requirements, but the required detail below wasn't provided for the following: e. Dividends (however none paid to date since commencement of operation and shareholding is 100% by Anglo American Platinum); f. Bonuses reflected but as part of Anglo Platinum, not the mine or the country. g. License fees, rental fees, entry fees and other considerations for licenses and/or concessions. <p>Information not broken down by recipient government body (where applicable), by project (where applicable), and by payment type.</p> <p>Also, not all of the required information was made publicly available (e.g. Unki 2018 Financial Report, which included much of the required evidence and is an internal document), such as information on permit and license fees etc. Only information related to taxes is made publicly available.</p> <ul style="list-style-type: none"> - All material payments made to government have not been made publicly available within 12 months after the end of the financial year. Payments to MMC, licenses etc. are currently not specified.
1.5.1.4. At minimum, this information shall be broken down by recipient government body (where applicable), by project (where applicable), and by payment type.		







<p>1.5.2.1. The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below.</p>	—	See 1.5.2.2.
<p>1.5.2.2. The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:</p> <ol style="list-style-type: none"> a. Mine production, disaggregated by product type and volume; b. Revenues from sales, disaggregated by product type; c. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department); d. Social expenditures, including the names and functions of beneficiaries; e. Taxes, tariffs or other relevant payments related to transportation of minerals; f. Payments to politicians' campaigns, political parties or related organizations; and g. Fines or other similar penalties that have been issued in relation to the project. 	⊕	<ul style="list-style-type: none"> - Mine production, disaggregated by product type and volume provided. - Revenues from sales, disaggregated by product type not specified, only volumes per annum. - Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department) not provided and readily accessible to the public other than total sum of taxes. - Social expenditures, including the names and functions of beneficiaries not provided. - Payments related to transportation of minerals was provided in 2018 Audited Financial Statement but is not readily accessible to the public. - Payments to politicians' campaigns, political parties or related organizations not provided, but explicitly reflected in Anglo Platinum anti-corruption documents as unacceptable practice. - Fines or other similar penalties that have been issued in relation to the project not specified and readily accessible to the public. - Not all of the required information was made publicly available (e.g. the Unki 2018 Financial Report that is purely an internal document, which included much of the required evidence).
<p>1.5.2.3. The operating company shall publish annual accounts, following international accounting standards.</p>	✔	<ul style="list-style-type: none"> - Unki has applied international accounting practice and policies. International Financial Reporting Issues Committee (IFRI) & International Financial Reporting Interpretations Committee (IFRIC) standards applied. - Verified in Annual Report. - Audited by Deloitte based on International Standards.
<p>1.5.3.1. If the mining project is located in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website.</p>	✔	<ul style="list-style-type: none"> - Unki through Anglo has publicly committed to supporting implementation of the EITI.
<p>1.5.3.2. If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall:</p> <ol style="list-style-type: none"> a. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and 	⊖	<ul style="list-style-type: none"> - EITI website reflects Anglo American's support, but the EITI is not being implemented in Zimbabwe yet. - Currently no evidence of country-level engagement in multi-stakeholder process beyond a Ministry of Mines and Mineral Development invitation to Anglo to an EITI Conference in Zimbabwe in October 2019, with Unki not having

		provided any evidence to date to confirm constructive engagement.
<p>1.5.4.1. The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in the national language(s) of the country in which the mining project is located.</p> <p>a. Where these terms are negotiated, rather than governed by law, the company shall make the relevant agreements, licenses or contracts freely and publicly accessible.</p> <p>b. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement.</p>	⊗	
<p>1.5.4.2. The beneficial ownership of the operating company shall be publicly accessible.</p>	✔	- Anglo Annual Reports reflect 100% ownership.
<p>1.5.5.1. Critical The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.</p>	●	<p>All supplier and service provider contract terms include clauses requiring compliance with Anglo American Platinum's corporate policies, including Business Integrity.</p> <ul style="list-style-type: none"> - No payments to politicians' campaigns, political parties or related organizations; and - HR procedures and contract terms for employees linked to legal requirements of Amzim Holdings Limited registration certificate (17 May 2016), including regarding business irregularities (Breaches and Sanctions), Dishonesty and Criminal Conduct. <p>However, comprehensive implementation has not been fully achieved yet due to the lack of training of contractors regarding anti-bribery and corruption.</p> <p>Unki shall implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.</p>
<p>1.5.5.2. Procedures shall include:</p> <p>a. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and</p> <p>b. Disciplinary actions to be taken if cases of bribery or corruption are discovered.</p>	✔	- Offenses addressed on the basis of categorization for breaches to code of conduct
<p>1.5.5.3. Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.</p>	S	<ul style="list-style-type: none"> - No evidence of training of contractors, but they are made aware of corruption requirements through the provisions of the contract. - Training course on Business Integrity provided to staff electronically and completion is tracked in Excel on weekly basis. - Anglo Platinum tracks training by Unki's supply chain employees.

- Current training is not outcomes focused, with current tracking reflecting limited completion of training to date.

Principle 2: Planning for Positive Legacies

RATING LEGEND
Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant
	Not scored





Chapter 2.1—Environmental and Social Impact Assessment and Management

Basis for rating

2.1.1.1	An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project.	—	IRMA recognizes that certain best practices may not have been widely used or expected at the time when existing mines should have carried out ESIA. As a result, existing mines have the option to mark this requirement as not relevant during IRMA's Launch Phase. The Environmental and Social Management requirements have been audited.
2.1.1.2.	To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.1.3.	The ESIA shall be carried out in accordance with publicly available, documented procedures.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.2.1.	Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.2.2.	Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide: <ul style="list-style-type: none"> a. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities; 	—	See justification for marking this as not relevant in 2.1.1.1.

	<ul style="list-style-type: none"> b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts; c. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and d. Contact details for the person or team responsible for management of the ESIA. 		
2.1.3.1.	Critical The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.3.2.	During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as "stakeholders") who may be interested in and/or affected by the proposed project.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.3.3.	Scoping shall include the consideration of: <ul style="list-style-type: none"> a. Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure; b. Direct, indirect and cumulative impacts; and c. Potential impacts of extreme events. 	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.3.4	Scoping shall result in the identification of: <ul style="list-style-type: none"> a. Potentially significant environmental and social impacts of the proposed project; b. Alternative project designs to avoid significant adverse impacts; c. Other actions to mitigate identified adverse impacts; and d. Additional information and data needed to understand and assess the potential impacts. 	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.4.1.	Baseline data describing the prevailing environmental, social, economic and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.4.2.	Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.5.1	The operating company shall: <ul style="list-style-type: none"> a. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping; b. Determine the significance of the predicted impacts; c. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the 	—	See justification for marking this as not relevant in 2.1.1.1.

		<p>avoidance of impacts through consideration of alternative project designs; and</p> <p>d. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders.</p>
<p>2.1.6.1. The operating company shall prepare an ESIA report that includes, at minimum:</p> <ul style="list-style-type: none"> a. A description of the proposed mining project; b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts; c. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts; d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and e. Names and affiliations of ESIA authors and others involved in technical studies. 	<p>—</p>	<p>See justification for marking this as not relevant in 2.1.1.1.</p>
<p>2.1.7.1. The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine.</p>	<p>☑</p>	<p>The 2016 proposed smelter EIA presents an environmental management plan and environmental monitoring system incorporating elements of ISO 14001. Collectively, these equate to an environmental management system.</p> <p>Unki was previously certified against ISO 14001 (previous version) and is now working towards certification against ISO 14001:2015 version (Unki will be audited by BSI 17-20 December 2019; during the same period BSI will also audit Unki against ISO 45001).</p> <p>The WRAC represents a functional risk management tool for the management of environmental and social risks.</p>
<p>2.1.7.2. An environmental and social management plan (or its equivalent) shall be developed that, at minimum:</p> <ul style="list-style-type: none"> a. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process; b. Assigns personnel responsible for implementation of various elements of the plan; and c. Includes estimates for the resources needed to implement the plan. 	<p>⊕</p>	<p>The 2003 EMP indicates that at the time of writing, an EMP was not a legal requirement, but the requirement was anticipated in proposed changes to Zimbabwean environmental legislation.</p> <p>The 2003 EMP addresses the entire mine lifecycle, from pre-tender to closure, but has a strong emphasis on the physical environment, with limited attention to the management of social and community related issues.</p> <p>Environmental Management Plan monitoring is reported on a quarterly basis to Environmental Management Agency (reviewed document - submission for Q3, 2019).</p> <p>Chapter 7 of the 2016 EIA for proposed smelter presents an 'Environmental Impact Mitigation and Management Plan', which addresses requirements a and b, but does not define the resources required (per IRMA 2.1.7.2 c).</p>

			Specific mitigation measures are addressed through SOPs (air quality monitoring seen as an example).
2.1.7.3.	The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information.		Safety, health, environment (SHE) programs are updated annually by SHEQ team and EMA comments on quarterly reporting are reflected in bi-annual reviews of the SHE Programs.
2.1.8.1.	As part of the ESMS, the operating company shall establish a program to monitor: <ul style="list-style-type: none"> a. The significant environmental and social impacts identified during or after the ESIA process; and b. The effectiveness of mitigation measures implemented to address environmental and social impacts. 		The 2016 EIA for the proposed smelter presents an environmental monitoring system. Environmental Management Plan monitoring is reported on a quarterly basis to Environmental Management Agency (reviewed document - submission for Q3, 2019). Evidence provided has strong emphasis on environmental rather than social impacts, but there is a separate social management plan tracker.
2.1.8.2.	The monitoring program shall be designed and carried out by competent professionals.		Monitoring plan presented in 2016 smelter EIA has been prepared by external professionals consultants. The air quality monitoring completed by an external contractor identified competency issues based on their applied methodologies. Water quality was completed by an internal Unki staff member.
2.1.8.3.	If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project.	—	Unki staff asserted that no request for independent monitoring had been received. Although not categorized as independent monitoring, community members are invited to attend monitoring activities by the company as observers.
2.1.9.1.	As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on: <ul style="list-style-type: none"> a. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3); b. Methodologies for the collection of environmental and social baseline data (see 2.1.4); c. The findings of environmental and social studies relevant to the conclusions and recommendations of the ESIA (see 2.1.5.1.a and b); d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c); e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and f. The final conclusions and recommendations of the ESIA (see 2.1.6.1). 		The description of consultation in the 2016 proposed smelter EIA contains very limited detail and is insufficient to conclude that IRMA 2.1.9.1 a, b, c, d, e and f have been addressed. Public consultation process included a presentation made to the communities at the outset of the EIA process (no evidence provided yet regarding the content of the presentation). Volume 4 of the EIA details the outcome of engagement with stakeholders on the potential positive and negative effects of the smelter (relevant to IRMA 2.1.9.1a) and potential mitigation measures the negative effects (relevant to IRMA 2.1.9.1d). This is sufficient for a rating of 'Partially Meets'. No evidence provided regarding feedback consultations with respect to the provisional conclusions and recommendations of the ESIA prior to finalization.
2.1.9.2.	The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate	—	See justification for marking this as not relevant in 2.1.1.1.

	the potential impacts of the project during and subsequent to the ESIA process.		
2.1.9.3.	The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and social monitoring program.	⊗	
2.1.9.4.	The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program.	⊕	Evidence was provided that communities participate in environmental monitoring exercises. Air and water quality monitoring are observed by local community members, who have been trained by Unki in engagement meetings. EMA does not conduct routine monitoring, but only after an incident as part of the verification process.
2.1.9.5.	The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.10.1.	The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.10.2.	The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account.	—	See justification for marking this as not relevant in 2.1.1.1.
2.1.10.3.	The environmental and social management plan shall be made available to stakeholders upon request.	⊙	Unki has an external communication procedure but this does not specify a policy with respect to issuing the ESMP if such a request were to be made. Noted during the Q1 2018 CEF agenda, the Social Management Plan was discussed. Unki has a system in place to make information publicly available upon request.
2.1.10.4.	Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available.	⊕	No indication that summary environmental and social monitoring reports are made available publicly at least annually or that monitoring data and methodologies are publicly available. Findings of environmental and social monitoring are discussed with the local communities at quarterly CEF meetings, but otherwise data are only shared with EMA. Data is channeled through regulatory bodies and there is no provision for direct publication of monitoring data. Quarterly environmental monitoring reports submitted to the government according to the Environmental Management (Environmental

			Impact Assessment and Ecosystems Protection) Regulations, 2007 (Section 13(2)).
2.1.10.5.	The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means.	⊗	
Chapter 2.2—Free, Prior and Informed Consent (FPIC)		Basis for rating	
Chapter not relevant		—	This chapter is not relevant because the operating company has provided evidence no indigenous peoples rights or interests are affected by the company's mining activities.
Chapter 2.3—Obtaining Community Support and Delivering Benefits		Basis for rating	
2.3.1.1.	The operating company shall publicly commit to: <ul style="list-style-type: none"> a. Maintaining or improving the health, social and economic wellbeing of affected communities; and b. Developing a mining project only if it gains and maintains broad community support. 	⊙	The AA Social way is a public document, which states that the company aims to maximize opportunities to make lasting positive impacts on the country and the host communities.
2.3.2.1.	For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained.	—	Unki is an existing mine.
2.3.2.2.	For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support: <ul style="list-style-type: none"> a. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project; b. Was transparent; c. Was free from coercion or manipulation; and d. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution. 	—	Unki is an existing mine.
2.3.2.3.	For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this

			requirement will be audited at Unki's surveillance audit.
2.3.3.1.	The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company's contributions to community development initiatives and benefits in affected communities.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.3.3.2.	The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.3.3.3.	If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process.	—	No request made.
2.3.3.4.	Efforts shall be made to develop: <ul style="list-style-type: none"> a. Local procurement opportunities; b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). 	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.3.3.5.	The planning process and any outcomes or decisions shall be documented and made publicly available.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.3.3.6.	In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements.	⊕	The Community Engagement Forum (CEF) meetings and the Social Management Plan (SMP) tracker provide some information on the effectiveness of the projects, but these are not sufficiently detailed, e.g. lack of agreed indicators, etc. No monitoring system developed with indicators and measurement tools that can be applied to all the development projects.

Chapter 2.4—Resettlement

Note on this chapter:

IRMA has provided clarification that existing mines such as Unki are not expected to demonstrate that resettlement was carried out in accordance with widely agreed international best practices, such as those codified in the IRMA Standard, or in the IFC Resettlement Standard, which came into effect in 2006. Existing mines cannot turn back the clock. However, they can ensure that the outcomes of resettlements are in accordance with the objectives of the IRMA Standard and other similar standards, namely, that the livelihoods and standards of living of displaced persons are improved over pre-resettlement conditions.

Additionally, if resettlements are government-led, then mines do not have full ability to carry out many of the IRMA requirements (so these can be marked as not relevant), however, requirements 2.4.8.1 and 2.4.8.2 are required to be assessed.

Chapter 2.4—Resettlement		Basis for rating
<p>2.4.1.1. If there is the potential that a new mine (including associated facilities) or the expansion of an existing mine or associated facilities may require land acquisition that could result in the involuntary resettlement (for the remainder of this chapter, referred to simply as resettlement) of people, the operating company shall undertake an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people.</p>	—	<p>See Note on this chapter, above, for rationale as to why this requirement is not relevant.</p> <p>The government executed the resettlements (which were not in accordance with international standards) for villages 17 and 18 (in 1999). Post resettlement, a RAP was prepared for village 17. A compensation plan was prepared for Makwikwi before resettlement. Village 18 had to be resettled again (in 2002) to make place for the waste dam. A preliminary RAP for village 18 with several options was prepared pre-resettlement for village 18 to move to Rietfontein. The RAPs did indicate the potential direct impacts related to physical and economic displacement. There is no evidence of a final RAP for village 18. There is no evidence of a RAP for the people resettled by the government from Impali (to accommodate the housing estate for Unki) to Pasimupindu, which took place in 2011. Only the latter resettlement falls in the category post 2006. Unki has not been involved in this resettlement and there was no associated documentation provided to the auditor.</p>
<p>2.4.1.2. The assessment shall:</p> <ol style="list-style-type: none"> Be undertaken during the early stages of mining project planning; Include identification of alternative mining project designs to avoid, and if that is not possible, minimize the displacement of people; Identify and analyze the social, cultural, human rights, conflict, environmental and economic risks and impacts to displaced persons and host communities for each project design alternative, paying particular attention to potential impacts on women, children, the poor and vulnerable groups; and Identify measures to prevent and mitigate risks and impacts, and estimate the costs of implementing the measures. 	—	<p>See Note on this chapter, above, for rationale as to why this requirement is not relevant.</p>
<p>2.4.1.3. The assessment shall be undertaken by competent professionals with experience in</p>	—	<p>See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>

	resettlement related to large-scale development projects.		
2.4.1.4.	The operating company shall document decision-making regarding alternative mining project designs and efforts to minimize resettlement.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.1.5.	The assessment shall be made public, or, at minimum, be made available to potentially affected people and their advisors.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.2.1.	The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during: <ul style="list-style-type: none"> a. The assessment of displacement and resettlement risks and impacts, including the consideration of alternative mining project designs to avoid or minimize resettlement; b. The development of resettlement and livelihood options; and c. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP). 	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.2.2.	The operating company shall facilitate access, if desired by potentially affected people and communities, including host communities, to independent legal or other expert advice from the earliest stages of project design and assessment, through monitoring and evaluation of the resettlement process.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.2.3.	People from affected communities, including host communities, shall have access to an effective mechanism to raise and seek recourse for concerns or grievances related to displacement and resettlement.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant There is evidence of a functional grievance mechanism. However, this does not seem to have been successfully used for the Impali resettlement grievances, nor does the grievance mechanism reflect the need to address resettlement legacy impacts.
2.4.3.1.	When project-related displacement is deemed unavoidable, a census shall be carried out to collect appropriate socio-economic baseline data to identify the people who will be physically or economically displaced by the project and determine who will be eligible for compensation and assistance.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.3.2.	In the absence of host government procedures, the operating company shall establish compensation eligibility criteria and a cut-off date for eligibility. Information regarding the cut-off date shall be well documented, and disseminated along with eligibility information throughout the mining project area.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant

<p>2.4.3.3. In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum:</p> <ol style="list-style-type: none"> a. Describe how affected people will be involved in an ongoing process of consultation throughout the resettlement/livelihood restoration planning, implementation and monitoring phases; b. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people, paying particular attention to the needs of women, the poor and vulnerable groups; c. Describe development-related opportunities and benefits for affected people and communities; d. Describe the methods used for valuing land and other assets; e. Establish the compensation framework (i.e., entitlements and rates of compensation for all categories of affected people, including host communities) in a transparent, consistent, and equitable manner; f. Include a budget and implementation schedule; and g. Be publicly available. 		<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>
<p>2.4.4.1. In all cases, when people are physically displaced as a result of the development or expansion of a mine or its associated facilities:</p> <ol style="list-style-type: none"> a. The operating company shall provide relocation assistance that is suited to the needs of each group of displaced peoples and is sufficient for them to improve or at least restore their standard of living at an alternative site; b. New resettlement sites built for displaced people shall offer improved living conditions; and c. Displaced people's preferences with respect to relocating in pre-existing communities and groups shall be taken into consideration and existing social and cultural institutions of the displaced peoples and any host communities shall be respected. 		<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>
<p>2.4.4.2. In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under national law:</p> <ol style="list-style-type: none"> a. The operating company shall offer the choice of replacement property (land and assets) of at least equal value and characteristics, security of tenure, and advantages of location; and 		<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>

<p>b. If cash compensation is appropriate and preferred by the affected people, compensation shall be sufficient to replace lost land and other assets at full replacement cost in local markets</p> <p>2.4.4.3. In cases where physically displaced people have no recognizable legal right or claim to the land or assets they occupy or use, the operating company shall:</p> <p>a. Offer options for adequate housing with security of tenure; and</p> <p>b. Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the project area prior to the cut-off date for eligibility.</p>	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
<p>2.4.5.1. If project-related land acquisition or restrictions on land use result in economic displacement, regardless of whether or not the affected people are physically displaced, the operating company shall apply the following measures:</p> <p>a. When commercial structures are affected, the business owners shall be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment, and the employees shall be compensated for lost income;</p> <p>b. When affected people have legal rights or claims to land that are recognized or recognizable under national law, replacement property of equal or greater value shall be provided, or, where appropriate, cash compensation at full replacement cost; and</p> <p>c. Economically displaced people who are without legally recognizable claims to land shall be compensated for lost assets other than land at full replacement cost.</p>	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
<p>2.4.5.2. All economically displaced people whose livelihoods or income levels are adversely affected shall be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living, and transitional support shall be provided based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. Additionally:</p> <p>a. For people whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost shall be offered as a matter of priority;</p> <p>b. For people whose livelihoods are natural resource-based and where project-related restrictions on access apply, continued access to affected resources or access to alternative resources with at least</p>	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant

	<p>equivalent livelihood-earning potential and accessibility shall be provided; and</p> <p>c. If circumstances prevent the operating company from providing land or similar resources as described above, alternative income earning opportunities shall be provided to restore livelihoods</p>	
2.4.6.1.	In order to be certified by IRMA, if a new project will require the displacement of indigenous peoples the operating company shall obtain the free, prior and informed consent (FPIC) of affected indigenous communities before proceeding with the resettlement and mine development (as per IRMA Chapter 2.2).	<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant.</p> <p>No displacement of indigenous people was required.</p>
2.4.6.2.	If a new mine will require the displacement of non-indigenous peoples, the operating company shall make a good faith effort to negotiate agreements with all households that will be physically or economically displaced by the mining project before proceeding with the resettlement, even if the company has the legal means to acquire land or restrict land use without their consent.	<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant.</p> <p>The government was in charge of the resettlement. There was no evidence provided to the auditor of any involvement of Unki in the resettlement and livelihood restoration. No data was provided to the auditor with respect to the resettlement of the Impali community.</p>
2.4.6.3.	<p>Prior to negotiating with affected people, the operating company shall provide or facilitate access to resources necessary to participate in an informed manner. This shall include, at minimum:</p> <p>a. Copies of RAP and/or LRP;</p> <p>b. Details on what to expect at various stages of the resettlement or livelihood restoration process (e.g., when an offer will be made to them, how long they will have to respond, how to access the grievance mechanism if they wish to appeal property or asset valuations, legal procedures to be followed if negotiations fail); and</p> <p>c. Independent legal experts or others to ensure that affected people understand the content of any proposed agreement and associated information.</p>	<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>
2.4.6.4.	In cases where affected people reject compensation offers that meet the requirements of this chapter and, as a result, expropriation or other legal procedures are initiated, the operating company shall explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring to mitigate the risk of impoverishment of those affected people.	<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>
2.4.6.5.	Forced evictions shall not be carried except in accordance with law and international best practice, and the requirements of this chapter.	<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p> <p>The Impali community indicated that the eviction was forced by the government.</p>
2.4.6.6.	The operating company shall take possession of acquired land and related assets only after	<p>— See Note on this chapter, above, for rationale as to why this requirement is not relevant</p>

	compensation has been made available, and, where applicable, resettlement sites and moving allowances have been provided to the displaced people.		
2.4.6.7.	The operating company shall document all transactions to acquire land rights, and all compensation measures and relocation activities.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.7.1.	Critical The operating company shall establish and implement procedures to monitor and evaluate the implementation of a Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP), and take corrective action as necessary until the provisions of the RAP/LRP and the objectives of this chapter have been met.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.7.2.	Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.7.3.	Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company: a. Shall retain competent professionals to verify the operating company's monitoring information and provide advice on additional steps needed to achieve compliance with the requirements of this chapter; and b. Shall commission a completion audit that: i. Occurs after the company deems that its RAP/LRP has been fully and successfully implemented; ii. Is carried out by external resettlement experts; iii. Includes, at a minimum, a review of the mitigation measures implemented by the operating company, a comparison of implementation outcomes against the requirements of this chapter, and a determination as to whether the commitments made in the RAP/LRP have been delivered and the monitoring process can therefore be terminated; and iv. Is made available to affected people and their advisors.	—	See Note on this chapter, above, for rationale as to why this requirement is not relevant
2.4.8.1.	Where land acquisition and resettlement are the responsibility of the government, the operating company shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this chapter.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.4.8.2.	The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the	●	Unki provided evidence of building a school and drilled water wells at the Impali/Pasimupindu resettlement. They have completed stakeholder interviews and engagement (the minutes are

operating company shall prepare a supplemental plan that, together with the documents prepared by the responsible government agency, shall address the relevant requirements of this chapter. The company shall include in its supplemental plan, at a minimum:

- a. Identification of affected people and impacts;
- b. A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations;
- c. The supplemental measures to achieve the requirements of this chapter in a manner that is permitted by the responsible agency and an implementation schedule; and
- d. The financial and implementation responsibilities of the operating company in the execution of its supplemental plan.

provided for one such meeting in the materials submitted). Unki provided evidence that the Shurugwi District Land Committee mandated by government is to coordinate implementation of the land reform program and establishment of formal resettlements at a district level.

Chapter 2.5—Emergency Preparedness and Response

Basis for rating

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

Business Continuity Management (BCM) Plan, Community Emergency Preparedness and Response (CEPR) Plan and associated documents conform with the requirements of APELL (10 steps were individually assessed in discussions and review of documentary evidence).

Long list of scenarios has been developed through comprehensive risk assessment process, examples seen include major incident at the TSF (tailings storage facility) (dam wall failure).

Risk assessment initially undertaken by Anglo Group Engineer and Unki team. Local communities and other stakeholders were trained by Unki to enable them to engage in the development of the emergency preparedness and response plan.



Stakeholder training / capacity building in Shona. Participants trained on risks, and then prioritized, focusing on the highest priorities, then sensitized on possible emergencies and likely mitigation. The training attendance register for community emergency (dated 16 June 2019) demonstrates capacitation for local communities to enable their involvement in the emergency planning process.

Areas of improvement are put into an action plan and then monitored regarding implementation.

There is no clear evidence that the results of the 2018 Groundwater Model report have factored into emergency preparedness and response, specifically regarding longer-term contamination of groundwater as a result of mining-related activities. While the report relates to water quality risk management, it does not appear to intersect with emergency scenarios and related responses.

- 2.5.1.2. The operating company shall:
- Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and
 - Update the communications contacts of the emergency response plan at least annually.

Evidence was provided for the completion of some emergency drills including employees, local communities and local government officials / institutions. Evidence was also provided for the distribution of information relating to emergency preparedness and response (including communications contacts) and training of local communities.

However, no evidence was provided of repeated drills involving local communities at least every 12 to 24 months. Drills involving local communities also appear limited to the catastrophic failure of the TSF (evidence on drills for other emergencies relevant to local communities such as explosions and fire/spills on roads was not provided). On that basis, the rating assigned is Substantially Meets.

It is unclear how the 2018 Groundwater Model report relates to emergency preparedness and response, or the testing of emergency response plans. The report deals with longer-term contamination of groundwater as a result of mining-related activities. While the report relates to water quality risk management, it does not appear to intersect with emergency scenarios and related responses. Based on this, the rating for 2.5.1.2 has not been changed.

The Community Emergency Preparedness and Response communication register signed by recipients in June 2018, confirms the distribution (also noted in similar documents from November 2018 and November 2019). This does not materially change the rating, which remains at 'Substantially Meets'.

- 2.5.2.1. **Critical** The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.

Minutes of a meeting to discuss installation of a perimeter fence on 31 August 2017 note that the community emergency preparedness and response plan and emergency contact numbers were also presented to attendees (including community members / representatives) during the meeting.

Unki meets with workers on emergency preparedness and response.

The plan is agreed and approved by the safety, health, environment and quality (SHEQ) committee, which includes a full range of internal stakeholders, including underground and surface workers' representatives.

SHE Management Review includes worker representatives and contractors as well as other SHE responsible parties within Unki departments.

Induction training for workers also includes emergency aspects - done on employment and then refreshed every year.

Risk assessment undertaken by Anglo Group Engineer and Unki team. Local communities and other stakeholders were trained by Unki to enable them to engage in the development of the emergency preparedness and response plan.

			<p>Training / capacity building in Shona. Trained on risks, and then prioritized, focusing on the highest priorities, then sensitized on possible emergencies and likely mitigation.</p> <p>Based on the agenda for the Q1 2018 Community Engagement Forum (CEF), the Community Emergency Preparedness and Response Plan was due to be discussed.</p> <p>In the Q1 2017 CEF minutes, a Community Awareness and Emergency Preparedness Campaign on floods was presented (related to high rainfall conditions rather than specific mine-related activities).</p> <p>The minutes of meeting with Ward 19 Community in April 2019 detail the discussion of the Vale Tailings Dam Wall Collapse and Cyclone Idai Disaster in the context of community emergency preparedness and response.</p>
2.5.3.1.	All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events.	✓	Appropriate insurance policy in place provided by local and offshore insurance companies.
2.5.3.2.	The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others.	✓	Insurance policy covers unplanned accidental events with no specific exclusions.
2.5.3.3.	The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property.	—	There has been no change of ownership since commissioning of the mine, concentrator and smelter. Consistent ownership confirmed by interview with Unki management.

Chapter 2.6—Planning and Financing Reclamation and Closure

Basis for rating

2.6.1.1.	The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company.	✓	<p>The mine conducts surface drilling annually (approximately 10 boreholes to a maximum depth of 330m) mostly in the dry season, although in 2019 drilling will be performed during the wet season as the allocated budget has not been used to date.</p> <p>The procedure for removal and rehabilitation of drilling sites was discussed during interview as was the financial provision and monitoring of the sites ecological recovery. The Final Rehabilitation, Decommissioning & Mine Closure Plan (FRDCP) states (p. 37) "All bores and exploration raises to be sealed to contain any seepage discharge once groundwater levels recover within the mine" and (p. 47) "All areas disturbed by mining activities and where topsoil has been replaced will be vegetated". Total liability costs are estimated and including in company financial statements for planning purposes.</p>
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2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.6.1.3.	Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4).	—	No evidence of concerns related to reclamation of exploration activities being raised by stakeholders to date. The mine does have an operational level grievance mechanism.
2.6.2.1	Critical Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.	☑	The mine closure plan developed prior to the mine's construction was based on the 2003 Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) prepared by Scott Wilson. The review of mine reclamation and closure plan 2018 revealed that this was the first plan developed and therefore a formal plan was not in place prior to construction activities. The 2018 plan does follow the general requirements that are compatible with protection of human health and the environment. There is currently a draft plan for 2019 which was shown to the auditor on site, but the document was not provided for detailed review.
2.6.2.2	At a minimum, the reclamation and closure plan shall contain: <ul style="list-style-type: none"> a. A general statement of purpose; b. Site location and background Information; c. A description of the entire facility, including individual site features; d. The role of the community in reviewing the reclamation and closure plan; e. Agreed-upon (after-ESIA) post-mining land use and facility use; f. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure; g. Source mitigation program to prevent the degradation of water resources; h. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization; i. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable; j. Earthwork: <ul style="list-style-type: none"> i. Stabilization and final topography of the reclaimed mine lands; ii. Storm water runoff/run-on management; iii. Topsoil salvage to the maximum extent practicable; iv. Topsoil storage in a manner that preserves its capability to support plant regeneration; 	☑	The current plan adequately addresses conditions a), b), c), j), k), m), n), o), and q). Conditions f), g) and h) are addressed by the Unki Mine Groundwater model (September 2018) but the findings are not reflected in closure plan. Condition i) is addressed by the hazardous landfill operational manual but again not reflected in the closure plan. Conditions d) and e) cannot be fairly addressed, as "affected communities" is a very vague definition, that will almost assuredly be defined differently by mine, auditor, and other stakeholders. There we must assign a "Fully Meets", because nothing that can be scored is failed by the Unki mine.

- k. Revegetation/Ecological Restoration:
 - i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use;
 - ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time;
 - iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed;
 - iv. Measures for control of noxious weeds;
 - v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6);
- l. Hazardous materials disposal;
- m. Facility demolition and disposal, if not used for other purposes;
- n. Long-term maintenance;
- o. Post-closure monitoring plan;
- p. The role of the community in long-term monitoring and maintenance (if any); and
- q. A schedule for all activities indicated in the plan.




- 2.6.2.3. The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum:
- a. Mobilization/demobilization;
 - b. Engineering redesign, procurement, and construction management;
 - c. Earthwork;
 - d. Revegetation/Ecological Restoration;
 - e. Disposal of hazardous materials;
 - f. Facility demolition and disposal;
 - g. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including:
 - i. Interim process water and site management; and
 - ii. Short-term water treatment;
 - h. Post-closure costs for:
 - i. Long-term water treatment; and
 - ii. Long-term monitoring and maintenance;
 - i. Indirect Costs:
 - i. Mobilization/demobilization;
 - ii. Engineering redesign, procurement and construction management;
 - iii. Contractor overhead and profit;



SRK Consulting has prepared mine closure liability estimates in 2011, 2012, 2013, 2014 and 2016 and the closure cost estimate is reflected in the Final Rehabilitation, Decommissioning & Mine Closure Plan (November 2018). Standardized Reclamation Cost Estimator (SRCE) model which is recognized by regulatory authority in the USA, Australia and other countries as the means by which closure costing is considered to be comprehensive and legally compliant. The liability estimates are in compliance with conditions a), b), c), d), e), f), h), i) and j).

Condition h) has not been addressed, however, the Zimbabwe Government does not require the company to hold financial surety with them. The SRCE model is a good estimate of physical/chemical closure but it does not address costs associated with social transition/post land use or the requirement for the provision of post closure development funds. However, this is not required by this IRMA requirement and so does not weigh against Unki mine's rating.

During the interview, the Unki Mines (Private) Limited - Audited Financial Statement for the year ended 31 December 2018 was explained by Rameck Zishiri and evidence that the closure costs have been included was provided. It was explained that the Unki Mine closure cost is included in the overall Anglo American financial statements which are then independently audited by Deloitte but the audit findings were not provided.




<p>iv. Agency administration;</p> <p>v. Contingency; and</p> <p>j. Either:</p> <p>i. A multi-year inflation increase in the financial surety; or</p> <p>ii. An annual review and update of the financial surety.</p> <p>2.6.2.4. The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report.</p>		<p>The first closure plan for the site was developed in 2018. The plan (including liability estimate) will be reviewed at least every 3 years or when there is a significant material change. Planning for closure will begin at least 5 years prior to the life of mine. This is line with internationally recognized good practice. In addition to this requirement the mine has had independent consultants prepare updated closure liability estimates for 2011, 2012, 2013, 2014 and as a result of significant changes such as the addition of the smelter in 2016.</p> <p>It was indicated during the interview that the Zimbabwean Regulatory Authorities (Ministry of Mines and Environmental Management Agency) do not have requirements for Unki to submit the closure plans to them.</p> <p>Documented evidence of stakeholder engagement with communities regarding closure was not provided by Unki's Social Performance or Mine Closure Team. Furthermore, the manner in which engagement is conducted with stakeholders is presently not fully understood by the Unki closure staff. However, Unki has a system in place to make information publicly available upon request.</p>
<p>2.6.2.5. If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:</p> <p>a. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and</p> <p>b. Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety.</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>2.6.2.6. Critical The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request.</p>		<p>Documented evidence of stakeholder engagement with communities regarding closure was not provided by Unki's Social Performance or Closure Teams. However, no requests for this information have been made and Unki has a</p>

			system in place to make information publicly available upon request.
2.6.3.1.	Open pits shall be partially or completely backfilled if: <ul style="list-style-type: none"> a. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and b. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and c. It is economically viable. 	—	The operation is an underground mining with no open pit/s and pit lake/s.
2.6.3.2.	Underground mines shall be backfilled if: <ul style="list-style-type: none"> a. Subsidence is predicted on lands not owned by the mining company; and b. If the mining method allows. 	✓	The mine is compliance with conditions a) and b). It is proposed to plug access portals to prevent access by a third party. Currently the mining method used is room and pillar which leaves rock (ore) pillar and therefore the issue of subsidence is not relevant if these pillars remain (i.e. subsidence will not occur). However, there is some lower grade ore material (0.3m thick) being left in the header and footer walls, which along with the rock pillars, could be mined at a later date. If this was to occur then backfilling of the mined shafts is most likely necessary to prevent surface subsidence. The first shaft is still being mined and therefore the issue of closure is not immediate. No subsidence will occur if the rock pillars remain. Under any other mining scenario the potential for subsidence may need further investigation. There has been consideration of using the tailings material as a backfill material but more test work is required for this to be considered a viable option.
2.6.4.1.	Critical Financial surety instruments shall be in place for mine closure and post-closure.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.6.4.2.	Financial surety instruments shall be: <ul style="list-style-type: none"> a. Independently guaranteed, reliable, and readily liquid; b. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan; c. In place before ground disturbance begins; and d. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. 	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.6.4.3.	Self-bonding or corporate guarantees shall not be used.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
2.6.4.4.	The results of all approved financial surety reviews, with the exception of confidential	○	This requirement was identified as needing additional guidance to ensure that it can be

		<p>business information, shall be made available to stakeholders upon request.</p>
<p>2.6.4.5. Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:</p> <ul style="list-style-type: none"> a. Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential reasons, the fact that the information has been withheld shall be disclosed along with the financial surety. b. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and c. Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to review the financial surety. 	<p>○</p>	<p>audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p> <p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>2.6.4.6. The terms of the financial surety shall guarantee that the surety is not released until:</p> <ul style="list-style-type: none"> a. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and b. Public comment has been taken before partial or final surety release. 	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>2.6.5.1. Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all mine facilities, including, but not limited to:</p> <ul style="list-style-type: none"> a. Inspection of surface (open pits) and underground mine workings; b. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and c. Mechanisms for contingency and response planning and implementation. 	<p>●</p>	<p>The mine is in compliance with conditions a) and b) but not c). Currently the mine has no assets which have been closed.</p> <p>The 2003 EMP provides overarching monitoring and management measures for the closure of the mine site which have informed the subsequent closure plan developed between 2011 and 2019 by SRK Consulting.</p> <p>Currently there is no stand alone monitoring plan for closure, nor an electronic database to store data and results of analyses to demonstrate compliance with closure criteria.</p> <p>The closure plans provide the framework for the development of a more detailed (stand alone) closure monitoring plan for each asset to be closed, such as the tailings storage facility, hazardous landfill etc.</p> <p>This framework is considered appropriate at this stage of the mine's operation, however, the hazardous landfill site is nearly at full capacity and</p>







	<p>will require formal closure in the near future (i.e. 2020/21). A detailed closure design and monitoring report will be required for this facility.</p> <p>Given most elements are in place, just a few gaps identified, we have to evaluate this a "Substantially Meets", particularly since c) is poorly worded and subject to interpretation.</p> <p>The Unki Mine FRDCP Final (SRK, 2018) includes post-closure monitoring requirements and maintenance of infrastructure, but no mechanisms for contingency or response planning. It does note that this is the first closure plan provided (Chapter 17, page 62, although SRK developed closure costs prior to this), but there is no component that identifies any mechanism for developing action plans or remediation measures. Therefore, the ranking based on available information is 'Substantially meets'.</p>
<p>2.65.2. Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance.</p>	<p>See comment in Justification 2.6.5.1 above.</p> <p>Current monitoring locations identified in Air and Water Monitoring Schedule indicate that monitoring locations are sufficient to detect off-site contamination for operations, and also for closure assuming no further changes to the project. The FRDCP Final (SRK, 2018) includes requirements for long-term monitoring post-closure (25 years). No specific monitoring plan has been provided to confirm that current monitoring points meet compliance needs, either during operation or closure, and no map of monitoring locations (expected in such a Monitoring Plan). However, the Smelter EIA (AA, 2016) provides a good summary of environmental monitoring requirements. Overall, the ranking for this requirement is 'Substantially Meets', currently. This will need to be re-evaluated as components such as the hazardous waste landfill site are closed.</p> <p>The mine currently has monitoring locations for discharge compliance relating to groundwater, surface water as well as air and noise. While final post closure monitoring locations are not required at this stage of the mine's operation, and it is considered that monitoring points in use are sufficient to detect off-site migration of contaminants during operation, in the near future these post-closure locations should at least be established for the hazardous landfill site (and at least conceptually established for other facilities).</p> <p>Unki mine are aware of this post closure monitoring requirement and are in the process of engaging consultants to review and update hydrology and hydrogeological models (see Unki Mine - Groundwater Model, September 2018, delta h Water System Modelling) to allow determination of operational and closure monitoring points. Evidence in the form of the scope of work and consultant's proposal were provided for this proposed work which will occur in 2020. However, at the time of the audit this work had not yet be undertaken. Given most elements are in place,</p>





			just a few gaps identified, we have to evaluate this as "Substantially Meets"
2.6.5.3.	Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively.	—	<p>This requires water quality monitoring for a minimum of 5 years post-closure...but currently the mine has no assets which have been closed. This is evaluated as "Not relevant".</p> <p>The FRDCP notes that monitoring is to continue for 25 years, although there is no indication in the plan that this can be reduced if water quality monitoring / modelling predicts that there will be no contamination of receiving waters.</p> <p>As the site is operational, and there are no closed components of the mine, this requirement is considered to be 'Not Relevant'.</p>
2.6.5.4.	Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources.	—	<p>Currently the mine has no assets which have been closed. This is evaluated as "Not relevant".</p> <p>As above, considered to be 'Not relevant' given no closed components yet.</p>
2.6.5.5.	If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds, or agricultural uses, adequate measures shall be taken to protect these organisms.	—	Underground operation.
2.6.6.1.	<p>Long-term water treatment shall not take place unless:</p> <ol style="list-style-type: none"> All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and The operating company funds an engineering and risk assessment that: <ol style="list-style-type: none"> Is carried out by an independent third-party; Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods; Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms; Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion. 	⊕	<p>The mine will not have a pit lake post mining and therefore long term water treatment is unlikely to be required. All other sources of water from the mine post closure may be able to be stabilized within the 5 year post closure monitoring period but this should be confirmed at least five years from the proposed mine closure date (see Unki Mine - Groundwater Model, September 2018, delta h Water System Modelling - Section 5.3.5 Post-Closure Scenarios). The mine is in compliance with condition a) and b) i and iii.</p>
2.6.6.2.	If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated.	—	<p>The mine will not have a pit lake post mining and therefore long term water treatment is unlikely to be required. All other sources of water from the mine post closure may be able to be stabilized within the 5 year post closure monitoring period but this should be confirmed at least five years from the proposed mine closure date (see Unki</p>

			<p>Mine - Groundwater Model, September 2018, delta h Water System Modelling - Section 5.3.5 Post-Closure Scenarios).</p> <p>The need for long term water treatment is unlikely but further assessment of this is required on an on-going and regular basis during the Life of Mine (LoM). The Unki Mine - Groundwater Model study address the potential for long term contamination from the TSF.</p>
2.6.7.1.	<p>The operating company shall provide sufficient financial surety for all long-term activities, including: mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company's finances at the time of mine closure or bankruptcy.</p>		<p>Financial surety is presented as accounting item, and the FRDCP includes the cost liability of closure and post-closure monitoring. Given the lack of financial surety mechanisms in the host country, it is not possible to 'guarantee' that funds will be available, so this is the highest ranking possible.</p>
2.6.7.2.	<p>If long-term water treatment is required post-closure:</p> <ul style="list-style-type: none"> a. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and b. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded. 	<p>—</p>	<p>At the present time, this requirement is considered Not Relevant because it is not clear if long-term water treatment will be required post-closure.</p>
2.6.7.3.	<p>The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety.</p>		<p>Long-term monitoring is included in the cost estimates in Tables 15-6 and 15-7, on pg 58 of the Final Rehabilitation, Decommissioning & Mine Closure Plan. This includes 25 years of monitoring. Financial surety is presented and revised annually based on liability estimates produced by SRK. This satisfies the criterion in all respects.</p>
2.6.7.4.	<p>Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:</p> <ul style="list-style-type: none"> a. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and b. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US \$10.00 or less (or its equivalent in other currencies). 		<p>Unki mine is in compliance with 2.6.7.4 a) requirement and uses a real interest rate of 2.1%, but requirements for b) were not addressed via evidence.</p> <p>The NPV model for the mine was requested but not provided.</p>

Principle 3: Social Responsibility–APPENDIX

RATING LEGEND
Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant
	Not scored

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.1.1.	The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law.	 Unki has adopted and implemented comprehensive human resources policies and procedures in line with Chapter 3.1 requirements and The Labor Act [Chapter 28:01].
3.1.2.1.	Critical The operating company shall respect the rights of workers to freedom of association and collective bargaining.	 <ul style="list-style-type: none"> - Unki respects the rights of workers to associate and collectively bargaining freely. - Workers are free to associate with a trade union of choice without fear of victimization. - Workers can hold meetings with trade union representatives. - Unki engages with the trade union representatives. - Unki workers have a workers' council that is independently elected by workers. - Unki does not interfere in the election of workers' council members or trade union representatives.
3.1.2.2.	Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms.	 The labor law does not restrict workers' organizations. The law allows workers to freely associate see 3.1.2.1. justification for rating.
3.1.2.3.	The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner.	 <ul style="list-style-type: none"> - Unki engages with workers' representatives and workers' organizations - Unki responds to requests for meetings by union representatives and workers' council representatives. - The meeting minutes are documented. Given the ambiguity in this requirement, no scoring applied to the 2nd sentence, including its

		reference to "timely" and "information needed for meaningful negotiation"
3.1.2.4.	Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers' representatives at fly-in/fly-out or other remotely located mine sites, where relevant.	✓ Unki allows workers' representatives and trade union representatives to access the mining site to carry out functions in the workplace. The Zimbabwe Diamond Mining Workers Union (ZDMWU), Associated Mine Union Workers of Zimbabwe (AMUWZ) and workers representatives were allowed access to the mining site and to hold meetings with workers.
3.1.2.5.	The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike.	✓ Based on the reviewed documents, and interviews with workers and worker representatives, Unki does not interfere in the operations of trade unions or worker organizations or impose sanctions on workers' organizations participating in a legal strike.
3.1.2.6.	Upon employment, the operating company shall: <ul style="list-style-type: none"> a. Inform workers of their rights under national labor and employment law; b. Inform workers that they are free to join a workers' organization of their choosing without any negative consequences or retaliation from the operating company; c. If relevant, inform workers of their rights under any applicable collective agreement; and d. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative. 	✓ Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, Unki informs workers of their rights under the law, right to join worker's organizations, collective bargaining agreement and contact details of worker organizations.
3.1.2.7.	The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike.	✓ Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, no evidence of discrimination or retaliation of workers who participate or seek to participate in legitimate workers' organization or legal strike was found at the time of the audit.
3.1.2.8.	Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements.	✓ - Unki respects the collective bargaining agreements. - Unki fully implements the agreements that are entered into with the trade union and the workers' council.
3.1.2.9.	The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under	✓ - Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, it appears that Unki does not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort,

		<p>applicable labor and social security laws and regulations.</p> <p>or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations.</p> <ul style="list-style-type: none"> - The majority of workers at Unki are permanently employed. - Fixed term or temporary contracts are used as a temporary measure to address labour requirements.
<p>3.1.2.10. The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike.</p>	<p>✔</p>	<p>Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers Unki does not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith.</p>
<p>3.1.3.1. The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements.</p>	<p>⬇</p>	<p>Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, it appears Unki bases employment relationships on the principles of equal opportunity and fair treatment.</p> <p>However, 'Risks associated with recruitment by Chiefs (apart from bribery) are not identified in risk assessments or alternative records. It was reported by some of the interviewed stakeholders that:</p> <ul style="list-style-type: none"> · The recruitment system done by chiefs is not fair and transparent; and · Chiefs reportedly use nepotism and give their relatives first preference compared to other deserving candidates. <p>Unki does not have evidence of monitoring recruitment by chiefs to ensure that the recruitment system is fair, transparent, and free from nepotism.</p>
<p>3.1.3.2. Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:</p> <ol style="list-style-type: none"> Targets or quotas mandated by law; Targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; or Operating company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets. 	<p>—</p>	<p>3.1.3.1, above, is applicable, therefore exceptions may not be made. Please see 3.1.3.1, which notes the gaps that must be addressed by Unki.</p>
<p>3.1.3.3. Critical The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.</p>	<p>⬇</p>	<ul style="list-style-type: none"> - Anglo American Group HR Principles and Policies, Group Policy on Bullying, harassment and Victimisation and AMZIM Holdings Limited Code of Conduct prohibits harassment, intimidation and exploitation of workers including female workers. - AMZIM Holdings Limited Code of Conduct outlines severe warnings on any person who

perpetrates harassment, intimidation and exploitation.

- Workers are trained on the stated policies and procedures.

- 100% of the interviewed workers reported that Unki has a zero tolerance against sexual harassment and such a misconduct attracts severe penalty, i.e. dismissal. Interviewed female workers reported that they are comfortable working at the mine including underground and are not afraid of being sexually harassed. The workers also reported that Unki effectively protects workers against sexual harassment and effectively implements its policies and procedures relating to sexual harassment.

- Disrespectful communication by some supervisors/managers was reported by some of the interviewed workers. Over 50% of interviewed workers reported that some managers/supervisors communicate disrespectfully when communicating with them. Given the seriousness of these claims, the audit team investigated them in depth.

In an interview, the Unki Human Resources management explained that he cannot completely rule out remote incidents of unprofessional communication by supervisors or managers. The management explained that while they activate the disciplinary procedure when such cases occur, the Human Resources Management preferred the approach where two parties discuss issues in an amicable manner than to issue disciplinary warnings as this may worsen the relationship between the parties. Reviewed grievances on verbal harassment documents show evidence of use of such an approach, as outlined in two examples below.

Example 1: Sampled grievance related to verbal harassment dated 20/09/2019 lodged by an employee in a supervisory role against his manager for verbal harassment. The complainant filed a complaint that the accused manager insulted him. The grievance record states that the manager said that, 'he could train a baboon to run the section better than the way the complainant was running the section'. The grievance outcome was that the manager apologized to the complainant and the complainant accepted the apology. No disciplinary action was taken against the manager.

Example 2: A sampled grievance case dated 06/01/2016 show a filed grievance wherein a manager said to a worker, 'he wanted to hit him because he not done his work as instructed'. The outcome was that the manager apologized to the complainant and the complainant accepted the apology. No disciplinary action was taken against the manager.

AMZIM Holdings Code of Conduct (CoC) - Disciplinary Handling Section in 2 classifies the

following as Category B misconducts which attracts disciplinary action which attract a severe warning.

(i)- [...] threatening to assault an employee or person at the workplace; or

(ii) -Using abusive, insulting or obscene language against any employee or person at the workplace; or Being rude, discourteous, impolite or disrespectful to any employee or person at the workplace.

However, disciplinary committees have leeway in assigning the severity of a warning. See AMZIM Holding CoC 2.2.5.iii: "Due to varying peculiarities in respect of disciplinary matters ... any disciplinary committee shall have full authority to impose a less severe penalty than those recommended herein should the justice of the matter so demand."

Given the fact that both managers apologized, and the apology was accepted in both cases, indicates that a less severe penalty was acceptable in these cases, at least according to the Code of Conduct. This did not rise to the level of indicating a major problem in terms of conformance with the Code of Conduct.

Despite the widespread claims of verbal abuse and actual incidents of grievances lodged by employees, no formal grievance has been lodged by non-supervisory/managerial workers regarding verbal harassment. No formal verbal harassment grievance has been made to the trade union or workers council representatives. While Interviewed workers reported that the reason for not reporting is that they do not want to further aggravate the working relationship with the managers/supervisors, there are anonymous grievance mechanisms in place, and at least one worker filed a grievance in the past without reprisal (as shown in Example #2 described herein). The workers are also aware of the company's policy on harassment.

As the sampled grievances do not appear to have violated the AMZIM Code of Conduct, and apologies were given by managers and then accepted, and furthermore, with no formal grievances lodged, it appears that this system is working as it is intended to.

Nonetheless, given that at least some workers feel uncomfortable using the existing grievance mechanism, and many have reported they are not aware of the anonymous grievance reporting mechanism which are available (see 3.1.5.1), Unki should ensure that the anonymous reporting mechanism be included in its grievance handbook and public notices regarding grievances. We also recommend that cases continue to be documented, including warnings made, and if warnings were waived, and why, in order to monitor repetitive abuses and how they were addressed. A non-retaliation policy should also be

			established so workers and managers feel they can use the grievance mechanism without fear of retribution.
3.1.4.1.	Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination, and be implemented to reduce the adverse impacts of retrenchment on workers.	✓	Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, Unki has not retrenched workers covered by the IRMA scope. Unki has a documented retrenchment procedure. Unki retrenchment procedure meets the requirements set out in 3.1.4.1.
3.1.4.2.	The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments.	✓	Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, Unki has not retrenched workers covered by the IRMA scope. Unki has a documented retrenchment procedure. Unki retrenchment procedure meets the requirements set out in 3.1.4.2.
3.1.5.1.	Critical The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum: a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution; b. Shall allow for anonymous complaints to be raised and addressed; c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.	✓	- Unki's anonymous grievance mechanism (i.e. Deloitte anonymous tip off hotline, safety, health, environment and quality (SHEQ) anonymous boxes and SHEQ complaints book) are not included in Section 4: Grievance Handling Procedure. The majority of interviewed workers reported that they are not aware of the anonymous grievance mechanisms. While not a requirement of IRMA 3.1.5.1, it would be good practice to reference, in Section 4 and in public notices, how to use the anonymous grievance mechanisms. This would help to publicize to workers that such mechanisms are available and can be used in reporting incidents (e.g., for workers wishing to report instances of verbal abuse - The grievance procedure (Part B: Grievance Handling Procedure, page 27-29, included in AMZIM Holdings Limited Code of Conduct_17 May 2016) allows workers' representatives to be present, if requested by the aggrieved worker - Unki has a documented grievance mechanism. It allows for anonymous filing of grievances (i.e. Deloitte anonymous tip off hotline, SHEQ anonymous boxes and SHEQ complaints book). -The grievance mechanism is communicated to workers at the time of hiring and at least annually as a refresher thereafter.

			<ul style="list-style-type: none"> - The grievance mechanism involves appropriate level of management and address concerns promptly. - Unki provides feedback to workers who lodge grievances in a timely manner.
3.1.5.2.	The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.	☑	Unki informs workers of the grievance mechanism at the time of recruitment and at least annually thereafter. Unki makes the grievance mechanism easily accessible to workers.
3.1.5.3.	The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues.	☑	Unki maintains record of grievances and the actions taken to respond to and/or resolve the issues.
3.1.6.1.	The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers.	☑	Unki has a documented disciplinary procedure that are made available to all workers at the time of hiring.
3.1.6.2.	The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation of workers during disciplinary actions.	☑	<ul style="list-style-type: none"> - Unki does not use corporal punishment during disciplinary actions. - 100% of the interviewed workers reported that Unki has a zero tolerance against sexual harassment and such a misconduct attracts severe penalty, i.e. dismissal. Interviewed female workers reported that they are comfortable working at the mine including underground and are not afraid of being sexually harassed. The workers also reported that Unki effectively protects workers against sexual harassment and effectively implements its policies and procedures relating to sexual harassment.' - Disrespectful communication e.g. yelling, shouting or insults are in some cases used as a disciplinary mechanism by supervisors and managers instead of using disciplinary measures outlined in the disciplinary procedure. It was reported by interviewed workers that such disrespectful communication is used when correcting workers when they have made mistakes, when they are failing behind with their work or missing set timelines. See 3.1.3.3 for the detailed finding. However, given the ambiguity in the definition of "mental" and "verbal" abuse, and given the context at mine sites where shouting is required to communicate due to loud equipment and deafness of miners (the most common medical ailment of miners), it is not possible to evaluate if the shouting and even insults described rises to the level of "verbal abuse".
3.1.6.3.	The operating company shall keep records of all disciplinary actions taken.	☑	Unki maintains records of all disciplinary actions taken against employees.
3.1.7.1.	The operating company shall document the ages of all workers.	☑	<ul style="list-style-type: none"> - Unki documents ages of all workers. - Unki maintains copies of government issued identification documents on file.
3.1.7.2.	Critical Children (i.e., persons under the age of 18) shall not be hired to do hazardous work	☑	- Unki does not employ persons under the age of 18.

	(e.g., working underground, or where there is exposure to hazardous substances).		<ul style="list-style-type: none"> - Unki has a policy which prohibits the use of child labour. - Unki has a robust hiring procedure that prevents the hiring of children. - Prospective workers are required to present their proof of age documents for age verification before being employed.
3.1.7.3.	Critical The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher.	✓	<ul style="list-style-type: none"> - Unki does not employ persons under the age of 18. - Unki has a policy which prohibits the use of child labour. - Unki has a robust hiring procedure that prevents the hiring of children. - Prospective workers are required to present their proof of age documents for age verification before being employed.
3.1.7.4.	When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself.	—	Unki does not employ persons under the age of 18.
3.1.7.5.	If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work: <ul style="list-style-type: none"> a. The child shall be removed immediately from his or her job; and b. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family. 	—	<p>Audit team observed no child under the minimum age conducting hazardous or non-hazardous work at the mine, during the assessment. In addition:</p> <ul style="list-style-type: none"> - Unki does not employ persons under the age of 18. - Unki has a policy which prohibits the use of child labour. - Unki has a robust hiring procedure that prevents the hiring of children. - Prospective workers are required to present their proof of age documents for age verification before being employed.
3.1.7.6.	Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
3.1.8.1.	Critical The operating company shall not employ forced labor or participate in the trafficking of persons.	✓	Based on reviewed documents, records, interviews with workers, worker representatives and human resources managers, it appears that Unki does not employ forced labor or participate in the trafficking of persons.
3.1.8.2.	Where there is a high risk of forced or trafficked labor in the mine's supply chain,	○	This requirement was identified as needing additional guidance to ensure that it can be



		<p>the operating company shall develop and implement procedures to monitor its suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.</p>	<p>audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>3.1.9.1. The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage.</p>	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>	
<p>3.1.9.2. Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage.</p>	<p>●</p>	<ul style="list-style-type: none"> - Unki Contractor (EPIROC Zimbabwe (PVT) LTD) pay slips do not state: <ul style="list-style-type: none"> (i) the number of ordinary and overtime hours worked by the worker during the period for which the payment is made and (ii) the number of hours worked by the worker on a rest day or public holiday during the pay period. Only amounts paid are indicated. - Employment contract for contractor Mine Maintenance Services (Pvt) LTD does not state the standard work weekdays-only total weekly hours are stated. Employment contracts for contractor Tandamanzi Drilling and SANDVIK do not state the rate that will be used for overtime payment. - Unki does not monitor its contractors to determine if there is use of forced labor including forced overtime. Unki does not place contractual requirements on its contractors to comply with local laws (including forced labor), regulations and its Responsible Sourcing Standard For Suppliers 2019. Unki did not provide documented evidence of such requirements being in place at the time of the audit. - Based on the reviewed sample, employees are paid correctly for the overtime worked. - Overtime is paid in accordance with the law. - 20% of the interviewed employees reported that in some cases overtime worked by some workers is not accurately captured resulting in delays in post overtime payment or non-payment of the post overtime. The overtime is therefore paid incorrectly or not paid at all because it is not captured or in some cases, the overtime is classified as 'not authorized'. 	
<p>3.1.9.3. All workers shall be provided with written and understandable information about wages (overtime rates, benefits, deductions and bonuses) before they enter employment, and for the pay period each time they are paid.</p>	<p>●</p>	<ul style="list-style-type: none"> - Unki issues all its employees with pay slips. The pay slips show number of hours worked by the worker on a rest day or public holiday during the pay period. However, 20% of the interviewed employees reported that in some cases overtime worked by some workers is not accurately captured resulting in delays in post overtime 	



			payment or non-payment of the post overtime. The overtime is therefore paid incorrectly or not paid at all because it is not captured.
3.1.9.4.	The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check).	✓	Unki pays workers' wages through bank transfer as set by requirements in 3.1.9.4.
3.1.9.5.	The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist: a. Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or b. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award.	✓	- Unki does not use deductions as a form of disciplinary mechanism. - All the reviewed deductions were in line with the law.
3.1.10.1.	The operating company shall ensure that: a. Regular working hours do not exceed eight hours per day, or 48 per week. Where workers are employed in shifts the 8-hour day and 48-hour week may be exceeded, provided that the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week; b. Workers are provided with at least 24 consecutive hours off in every 7-day period; and c. Overtime is consensual, and limited to 12 hours a week. d. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if: i. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and ii. Through consultations with workers' representatives, a risk management process that includes a risk assessment for extended working hours is established to minimize the impact of longer working hours on the health, safety and welfare of workers.	✗	
3.1.10.2.	Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide: a. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and b. A maternity leave period of no less than 14 weeks.	✓	- The national law includes provisions for worker leave. - Unki provides annual leave as mandated by the law. - Unki provides maternity leave period of no less than 14 weeks as mandated by the law.

Chapter 3.2—Occupational Health and Safety

Basis for rating

<p>3.2.1.1. The operating company shall implement a health and safety management system for measuring and improving the mining project's health and safety performance.</p>	<p>Environmental carbon reduction included in the Health and Safety Policy. Not all potential stressors mentioned.</p> <p>Unki has an integrated SHE policy and has SHE specific appointments within each department. SHE objectives are included in the risk assessment.</p> <p>Unki was previously certified to OHSAS 18001, but decided at corporate level to not continue with ISO 18001 and instead focus on conformance with Anglo Safety, Health and Environment (SHE) Way. However, that has since changed and Unki will be audited against ISO 45001 from 17 to 20 December 2019.</p> <p>Unki undertakes bi-annual self-assessments (gap analysis) versus SHE Way using a clearly defined protocol. According to Unki staff, SHE Way is itself aligned with ISO 45001. Latest self-assessment using ENABLON online tool was in November 2019, the results of which indicated a close alignment between Unki practices and SHE Way requirements (overall score of 97% and 5 non-conformities identified).</p> <p>Training coordinated by Human Resources Department (HRD) and also SHE department.</p> <p>Operational control - safe standard operating procedures.</p> <p>Incidents - Lessons learned, internal and external reporting.</p> <p>Scope of occupational health and safety (OHS) is comprehensive, covering concentrator, mine, smelter and support services.</p> <p>The Safety Performance and Safety Strategy presentation summarizes safety data and trends (for 2018, 2017 and 2016 for some indicators and annually back to 2011 for others).</p> <p>Contractors are expected to comply with Unki standards - if they have undertaken their own analysis, they will still be expected to apply the Unki tools in order to sign off / approve tenders.</p> <p>Reviewed example of contractor assessment to conform with Unki requirements, using Unki Workplace Risk Assessment and Control (WRAC) template, approved by Safety Officer, Chief Safety Officer-Risk and Systems, General Manager and safety health, environment and quality (SHEQ) Manager.</p>
<p>3.2.2.1. The operating company shall implement an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations.</p>	<p>Risk assessment is implemented as a four layer process:</p> <ul style="list-style-type: none"> - Baseline risk assessment - Issue based risk assessment - Job risk assessment (JRA) (task-related) - Stop Look Assess Manage (SLAM) (continuous risk assessment)

		<p>Tools used include:</p> <ul style="list-style-type: none"> - WRAC - workplace risk assessment and control for all new projects - Hazard and operability (HAZOP) - applied by internal staff and external specialists - BOWTIE analysis - Job risk assessment (JRA) - Continuous risk assessment (SLAM) <p>Operational Risk Management Procedure is comprehensive.</p> <p>Occupational health consists of medical and hygienist, and all info on exposure at medical through linking process.</p>
<p>3.2.2.2. The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:</p> <ol style="list-style-type: none"> a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and machinery, and waste and chemical management; b. All personnel, contractors, business partners, suppliers and visitors; c. Unwanted events; d. Routine and non-routine activities, products, procedures, and services; and e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services. 		<p>Unki has implemented a comprehensive risk assessment process, using a standard 5x5 risk matrix addressing comprehensive hazards in the following categories:</p> <ul style="list-style-type: none"> - Harm to people - safety - Harm to people - occupational health - Environmental impact - Social / community impact - Legal and regulatory - Material losses, damage and business interruption <p>Specific hazards addressed include:</p> <ul style="list-style-type: none"> - Biological - Chemical - Climatic/ Natural Events - Confined Spaces - Dust / Inhalable particulates - Electrical - Ergonomics - Explosives - External Threats - Fire - Gravitational (Objects) - Gravitational (People) - Land - Lighting - Mechanical (Fixed) - Mechanical (Mobile) - Magnetic - Noise - Personal / Behaviour - Pressure / Explosions - Psychological - Radiation - Social/ Cultural - Thermal - Vibration - Waste - Water
<p>3.2.2.3. The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to particular hazards.</p>		<p>Third layer in Risk assessment process is task related and will address persons with disability to perform tasks.</p> <p>Starts with recruitment process - new employees declare if they have underlying conditions and the company has also screened via medical / health</p>



		<p>assessment. This then feeds into the risk assessment process.</p> <p>Workers that have been injured through work are moved to more appropriate job (examples noted - fall of ground, underground worker moved to change rooms; worker involved in bus crash in 2014 moved to security).</p> <p>Job placement looks at the fitness of applicant to work in a certain area, and hence relies to an extent on declaration by the applicant and also through health screening.</p> <p>Pregnant women are considered vulnerable and as soon as they confirm their pregnancy with their supervisor, they are moved to safer working environment (away from reagent storage and use for example). Policy document notes that pregnant women may not do work that is hazardous to the health of the mother or unborn child.</p>
<p>3.2.2.4. The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards.</p>		<p>The 5x5 risk assessment matrix is an integrated risk management plan to prioritize and eliminate hazards where this is possible, and otherwise control hazards to minimize the potential for harm to workers.</p>
<p>3.2.2.5. In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:</p> <ul style="list-style-type: none"> a. Ensure that the mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment; b. Ensure that the mine is commissioned, operated, maintained and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons; c. Maintain the stability of the ground in areas to which persons have access in the context of their work; d. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface; e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted; f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards; g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location. 		<p>Measurement and monitoring of SHE performance are undertaken using a standard clearly defined procedure addressing proactive and reactive approaches. Outcomes are reported to the monthly SHE meetings and management review meetings.</p> <p>Ground stability - risk assessment integrated with process of selecting appropriate bolts to ensure safe condition</p> <p>'Buy quiet' policy, according to which any equipment with noise generation over 105 dB should be phased out to reduce noise at source by 31 December 2013. Potential sources of noise include drill rigs, fans, trucks, ore silos.</p> <p>Color coding system used to document inspection of equipment and structures (color marked on inspected equipment is changed to reflect current quarter). This system has not yet been implemented at the smelter (which instead documents quarterly inspections without tagging equipment and structures; no evidence provided for documenting of inspections at the smelter).</p> <p>Risk assessment based on ground assessment.</p> <p>Walkways for pedestrians clearly marked and clear of any significant obstructions (observation - surface tour, 03 December 2019).</p> <p>Refuge chambers are first point of emergency provision and then evacuation. Two points of access - decline and vertical shaft.</p> <p>Mining inspector has the right to enter at any time to review.</p>

	<p>Ventilation plan is part of the mine plan - updated quarterly and subject to assessment by ministry at national level. Unki has 2-hour re-entry period following blasting (which is an exemption relative to the legislated 4-hour period).</p> <p>Evacuation is addressed as part of the BCM Plan (see Chapter 2.5).</p> <p>WRAC is undertaken for work by contractors as well as Unki employees.</p> <p>Double-walled tanks in bunded areas used for the storage of diesel.</p> <p>Minor non-conformities were identified during the tour of surface and smelter areas:</p> <p>Surface</p> <ul style="list-style-type: none"> - Minor ground surface trip hazards (e.g. unmarked changes in height of ground surface) - Minor obstacles on walkways (e.g. water hoses crossing walkways) - Minor oil spills in engineering workshop (slip hazard) - No safe working limit indicated on internal shelves at the central stores - No temperature gauge or temperature alarm in the outdoor storage area for gas bottles (acetylene, oxygen, argon), which according to Unki staff should be kept below 30 degrees centigrade - Presence of flat concertina razor wire on the pedestrian side of some fences along walkways - Some diesel staining on the external wall of bunding following a leak, possibly indicating leakage through the bund wall - Minor obstacles close to fire fighting equipment <p>Smelter</p> <ul style="list-style-type: none"> - Poorly stacked 1 tonne supersacks - Ripped 1 tonne supersacks, with powdered contents leaking out.
<p>3.2.3.1. Workers shall be informed of their rights to:</p> <ol style="list-style-type: none"> a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority; b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority; c. Know and be informed of workplace hazards that may affect their safety or health; d. Obtain information relevant to their safety or health, held by the employer or the competent authority; e. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and 	<p>SLAM tool implemented by the workers so they understand the risks. Different forums in effect - If workers are not able to speak to the supervisor, they can speak to the SHE representative; rules for life. SHE rep has to be a fulltime worker in a section and selected by the workers; once selected they are in place for three years and then a new rep can be selected (or they can continue if the team chooses).</p> <p>✔ Complaints policy - complaints can be raised through complaints book, which leads to mitigation measures. Complaints can be made anonymously.</p> <p>Workers also have the opportunity to offer suggestions. Workers were concerned about water ingress in bords between ONB19 and ONB29 and stopped work; company undertook a technical study and recommended an adjustment to the mining location and method, confirming the workers' concerns (process is documented in</p>

<p>f. Collectively select safety and health representatives.</p>		<p>technical report on the proposed change of design of Unki East Upper North Blocks 2&3). Stop and fix approach, if this is not possible, it is elevated to a supervisor. Pocket guidebook is carried by all workers, with SLAM and a stop and fix form included (two examples reviewed - showing issue and corrective action taken and confirming whether issue can be closed out). With respect to e., the rules for life explicitly state situations where employees should refuse to work (when unsafe, untrained, inappropriate PPE etc.).</p>
<p>3.2.3.2. In all cases a worker attempting to exercise any of the rights referred to in 3.2.2.1 in good faith shall be protected from reprisals of any sort.</p>	<p>✔</p>	<p>Communication, Consultation and Participation Procedure dated 31 October 2019 clearly states that employees are allowed to raise SHE related issues without reprisal.</p>
<p>3.2.3.3. The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety.</p>	<p>✔</p>	<p>Noticeboards throughout site display relevant OHS information (e.g. current campaigns, Rules for Life). Toolbox talks every day with all workers. SHE meetings - SHE Reps and workers attend, at departmental and mine-wide levels. SHE week once per year - covering all aspects of health and safety, using external specialists to deliver talks and run workshops. SHE campaigns - on noticeboards (specific topics). Rules for life posters are widely distributed across the site on notice boards.</p>
<p>3.2.3.4. The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:</p> <ul style="list-style-type: none"> a. Health and safety hazard identification and assessment; b. Design and implementation of workplace monitoring and worker health surveillance programs; c. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. 	<p>✔</p>	<p>Mine manager, section supervisors and SHE reps attend, representing underground. SHE rep carries out or is involved in a team that monthly undertakes section reviews; issues are then elevated to the Chief Safety Officer. SHE reps input to health surveillance via monthly SHE meetings. Main SHE Committee Meetings are attended by SHE reps, contractors, HOD and discuss key issues. Employ a Wellness Officer that has a degree in counselling to address mental health issues and also employs a Wellness Coordinator (holistic approach to health). Toolbox talks and health posters extend to mental-health related issues, such as stress management.</p>
<p>3.2.3.5. The operating company shall provide workers' health and safety representatives with the opportunity to:</p> <ul style="list-style-type: none"> a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace; b. Monitor and investigate safety and health matters; c. Have recourse to advisers and independent experts; and 	<p>✔</p>	<p>The learning from incidents procedure includes clearly defined steps to minimize the risk that similar repeat incidents will occur, including incident response, investigation, analysis and classification, reporting and sharing of lessons learned and performance evaluation and assurance. If there is an incident, SHE rep is involved as part of the investigation team and also as part of the review team.</p>

<p>d. Receive timely notice of accidents and dangerous occurrences.</p>		<p>Policy and procedure relating to incident investigation and how various parties play various roles, including how SHE reps are involved in incident investigations.</p> <p>If SHE reps do not agree with the outcome of an incident investigation, recourse ultimately to external arbitration (if it cannot be resolved internally), but there has not been an issue with this to date and there is no specific procedure in place (but there is a related parallel procedure in labor relations disputes).</p>
<p>3.2.3.6. Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering.</p>	<p>✔</p>	<p>Comprehensive auditor inductions related to behaviour, personal protective equipment (PPE) and emergencies are undertaken as part of the audit visit at offices, concentrator, smelter and underground.</p>
<p>3.2.4.1. Critical (a and b) The operating company shall implement measures to protect the safety and health of workers including:</p> <ul style="list-style-type: none"> a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; 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. 	<p>●</p>	<p>With respect to a., workers are informed of hazards, health risks and relevant preventative and protective measures using:</p> <ul style="list-style-type: none"> - Widespread health and safety notices throughout operational areas displaying relevant OHS information (e.g. current campaigns, Rules for Life). - Stop Look Assess Manage (SLAM) Forms - Procedure for the identification, selection, use, maintenance and disposal of PPE - Noticeboards throughout site - Toolbox talks every day with all workers - SHE meetings - SHE Reps and workers attend, at departmental and mine-wide levels. - SHE week once per year - covering all aspects of health and safety, using external specialists to deliver talks and run workshops - SHE campaigns - on noticeboards (specific topics). <p>With respect to b., identification, selection, use, maintenance and disposal of PPE procedure, dated 04 April 2014 specifies free PPE issue and replacement. The availability of PPE at no cost was confirmed during interviews with worker representatives and contractor workers.</p> <p>With respect to c., it is a legal requirement for underground workers to be trained in first aid; there should be a first aider in each team; first aid pouch issued to team leader and first aid equipment at the waiting place in each section, portal notified and underground ambulance mobilized and then to mine clinic. Doctor assessment at on-site clinic and then may be moved to local hospital or hospital in Harare by road or air. Initial treatment costs by company, which is then reclaimed from the social security authority (workman's compensation) (to avoid delays with treatment).</p> <p>With respect to d., there is induction training and also toolbox talks are documented - attendance</p>

		<p>register with a copy of the presentation (if appropriate) and/or the topic covered, which could be general (preventative) or in response to a specific incident. Also undertake training / lessons learned related to external (non-Unki) incidents, where issues at other sites and in other contexts can generate useful lessons for Unki staff.</p> <p>With respect to e., the concept of adequate supervision and necessary control (and not undertaking tasks in their absence) is integrated with the SLAM tool used by workers.</p> <p>With respect to f., system in place to define number of people underground at any one time through biometric signing in, signing out of self-rescuers and lamps, and signing in at the section waiting area. The section lead can then check that these three pieces of information triangulate (this is done in advance of blasting to ensure that people are clear of the area). If the data do not triangulate, then the missing person(s) must be found before blasting occurs. This seems like a sign-in/sign-out practice, but doesn't identify and track a worker at any time in the mine underground.</p>
<p>3.2.4.2. If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers.</p>	<p>✓</p>	<p>HIV-positive employees are treated as other workers; injured workers may be shifted to more suitable jobs; pregnant women - see IRMA 3.2.2.3.</p>
<p>3.2.4.3. The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers.</p>	<p>✓</p>	<p>Public Health Act requires 1 toilet per 25 women, 1 toilet per 25 men, above and below ground.</p>
<p>3.2.4.4. The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows:</p> <ul style="list-style-type: none"> a. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement: <ul style="list-style-type: none"> i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period; ii. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until 	<p>✓</p>	<p>Unki pays the insurance dividend monthly, and the social security authority is responsible for compensation; compensation is based on salary and percentage disability after an assessment process.</p> <p>In case of fatality, social security authority pays for funeral and then compensation and pension is paid to spouse and children (the latter while they remain below 18 or 23 if still at school).</p> <p>Rehabilitation centre run by the government (one national centre), where injured people are either rehabilitated or retrained (if they cannot return to previous job).</p>

<p>the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary they would otherwise normally receive if healthy and working); or</p> <p>iii. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker's employment at the mining project.</p> <p>b. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and</p> <p>c. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation that is equal to or greater than three months' salary of the deceased worker.</p>		
<p>3.2.5.1. The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures.</p>		<p>Interview with Worker Representatives confirmed involvement in inspections and investigations related to OHS incidents.</p>
<p>3.2.5.2. The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:</p> <p>a. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals;</p> <p>b. Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests;</p> <p>c. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory;</p> <p>d. Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of</p>		<p>A contractor or permanent employee has to go through a medical before being retained. Employees then undergo periodic monitoring. Transfer examinations are also undertaken when employees move from one job to another based on specific medical requirements.</p> <p>The fitness to work procedure does not specify how the confidentiality of data is protected or managed and does not address workplace monitoring and appropriate standards or analytical methods (it is focused on medical surveillance rather than dust, noise etc. measurements in working locations).</p> <p>Guidelines for job placement define health-related constraints and fitness for work on specific types of job (based on likely hazards) to avoid placement of employees in unsuitable jobs.</p>

	<p>Governmental Industrial Hygienists (ACGIH); and</p> <p>e. If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits.</p>		
3.2.5.3.	<p>Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results.</p>	✓	<p>Risk Management Procedure details updating process.</p> <p>Procedural documents have a 'Record Change' section detailing updates between initial issue of the document and the current version. This can include inputs from the Incident Review Committee.</p>
3.2.5.4.	<p>The operating company shall ensure that all workplace injuries, fatalities, accidents and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, investigated and that appropriate remedial action is taken.</p>	✓	<p>Reporting is done in accordance with SHE Incident and Reporting Procedure. Reporting to the Ministry of Mines is completed using a template on a monthly basis.</p> <p>Also report to social security authority on an incident basis (follow up within 14 days). Corporate requirements - have to report within 24 hours to the group even if a minor incident (as detailed in the Learning from Incidents Procedure).</p> <p>Although there was no evidence that documents were not being submitted to the relevant authorities, evidence of the submission of such documents was not seen by the auditor. A review of examples of these documents will be undertaken during the surveillance audit to confirm they are being submitted in accordance with Unki procedures and legal requirements.</p>
3.2.6.1.	<p>The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities and dangerous occurrences collected by the company and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, shall be available to workers' health and safety representatives.</p>	●	<p>Interview with Worker Representatives confirmed availability of data and information to them.</p> <p>Evidence of risk assessment and OHS monitoring provided, but health surveillance records not seen.</p> <p>Safety Performance and Safety Strategy presentation, dated 01 July 2019 presents OHS statistics (using standard key performance indicators) and long-term OHS performance trends.</p>
3.2.6.2.	<p>The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the health data management system.</p>	✓	<p>Fitness to Work Procedure details data management and record control (with retention of documents / data for a 40 year period).</p>
3.2.6.3.	<p>The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations.</p>	●	<p>While documents were provided that note medical and health surveillance data are accessible to individual workers, no evidence of health surveillance records was provided.</p> <p>Everyone is sent an alert for every incident whether minor or not, sent out by email and</p>

presented as a toolbox topic. This extends to any follow up actions.

See other incident related notes on external incident lessons learned.

Chapter 3.3—Community Health and Safety

Basis for rating

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

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



Risks and potential impacts to community health or safety have been identified in ORMP Anglo risk matrix, Unki Mine Register of Ten Priority Unwanted Events, Unki Baseline Risk Assessment 29.11.19, Unki Platinum Mine Preliminary Mine Closure Plan (final).

3.3.1.2. Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure).



-The Operational Risk Management Process (ORMP) Anglo risk matrix, Unki Mine Register of Ten Priority Unwanted Events, Unki Baseline Risk Assessment 29.11.19, Unki Platinum Mine Preliminary Mine Closure Plan (final)

- November 2018, Disease prevalence in Unki's 50km zone of influence. Identifies some not all of the risks that may occur throughout the mine lifecycle. There is no evidence of a scoping exercise being done

- Insufficient scoping to examine risks and impacts to community health and/or safety that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure).

3.3.1.3. Scoping shall include consideration of the differential impacts of mining activities on



This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this

	vulnerable groups or susceptible members of affected communities.		requirement will be audited at Unki's surveillance audit.
3.3.2.1.	The operating company shall carry out an assessment of risks and impacts to: <ul style="list-style-type: none"> a. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping; b. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable. 		-The risk assessment does not include the duration of the identified potential risks and impacts.
3.3.3.1.	The operating company shall document and implement a community health and safety risk management plan that includes: <ul style="list-style-type: none"> a. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and b. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective. 		ORMP Anglo risk matrix, Unki Mine Register of Ten Priority Unwanted Events, Unki Baseline Risk Assessment 29.11.19, Unki Platinum Mine Preliminary Mine Closure Plan (final) , include control actions which would be undertaken for impacts to community health and safety. For example, see row 110 in tab "SHEQ" (safety, health, environment and quality) in the baseline risk assessment, which identifies "Release of Polluted water into the environment contaminating water sources for surrounding communities." as an undesired event and describes control actions to mitigate the impact.
3.3.3.2.	Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation.		- Risk assessment mitigation measures prioritize avoidance of risks and impacts over minimization and compensation.
3.3.3.3.	The community health and safety risk management plan shall be updated, as necessary, based on the results of risk and impact monitoring.		The Unki risk assessment is reviewed at least annually or earlier. It includes elements of impacts to community health and safety.
3.3.4.1.	If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives: <ul style="list-style-type: none"> a. In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining; b. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and c. Make information publicly available on its infectious disease mitigation program. 		- Unki has a robust HIV/AIDS programme that meets the requirements in 3.3.4.1.
3.3.4.2.	If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and		-Unki has robust HIV/AIDS and tuberculosis prevention and mitigation programmes that meet requirements in 3.3.4.2.

mitigation strategies shall be applied, as appropriate:

- a. In relation to HIV/AIDS, the operating company shall, at minimum:
 - i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;
 - ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate;
 - iii. Provide access for contractors to education and other preventative programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and
 - iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members.
- b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.
- c. In relation to malaria, the operating company shall, at minimum:
 - i. Develop a vector control plan;
 - ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and
 - iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing.

- 3.3.5.1. The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in:
- a. Scoping of community health and safety risks and impacts related to mining;
 - b. Assessment of significant community health and safety risks and impacts related to mining;
 - c. Development of prevention or mitigation strategies;
 - d. Collection of any data needed to inform the health risk and impact assessment process; and
 - e. Design and implementation of community health and safety monitoring programs.

This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.

3.3.6.1. The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.



-Based on the interviews with stakeholders in Pasimupindu, Village 17, Rietfontein and Ward 20, Unki communicates community health and safety risks and impacts and monitoring results to the mentioned communities

Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas

Basis for rating

Chapter not assessed



IRMA is not assessing this chapter during its Launch Phase, just collecting information to help inform future guidance on chapter implementation.

Chapter 3.5—Security Arrangements

Basis for rating

3.5.1.1. The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force.



-Unki has a Human Rights Policy and the Voluntary Principles On Security and Human Rights (VPSHR) Policy which are publicly available on the Anglo American website (<https://www.angloamerican.com/sustainability/ap-proach-and-policies>). The policies are communicated to workers and their representatives.

3.5.1.2. **Critical** The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:

- Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;
- If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and
- Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury.







A Risk Assessment Report by Anglo-American ("Voluntary Principles: Risk, Impact, and Opportunities Assessment based on International Best Practice" – VPSHR risk assessment) reveals a few Medium-High Consequence "Possible" impacts which would require or be involved with use of force by mine personnel:

- Violent, riot, and unrest situations / mass action by disgruntled communities.
- During a labor strike, the Intimidation of non-striking employees.
- High Levels of Criminal Activity. On auditor's sampled review of community meeting minutes (e.g., meeting with Ward 19 community meeting minutes, Minutes with public security force provider) and interviews with public security, it is obvious that crime is a major issue in the area. During one community meeting, the theft of a mine fence (by leaders of the local community, no less) was reported – subsequently, cattle wandered into tailings mud and had to be rescued by mine staff. The public security interviews indicated that a "group of armed robbers were roving in [the local town] Shurugwi targeting goal dealers and business people".
- Unlawful detention/arrest
- Use of Private Security company and their employees to protect mine property.

	<p>Unki has a documented procedure that includes information on the use of force (Effecting an arrest procedure). The procedure prohibits the use of violence when effecting an arrest. This policy is adequate to cover situations related to crime and protection of company property, and to prevent unlawful arrests.</p> <p>The Effecting an arrest procedure section 9.3 and 9.10 only addresses the use of force in so far as arresting of a suspect is concerned. There is no policy governing situations of mass unrest (riots, mass action, intimidation of non-striking workers) which Unki itself considers possible and of high-consequence. Rather than a policy, the mine requires training to the Anglo-American Voluntary Principles on Human Rights Policy (a number of signed examples attesting that security personnel did receive training on this document were provided).</p> <p>Unki does not allow the use of firearms on its premises. There is no evidence that private security forces are trained or understand they cannot have firearms on site.</p>
<p>3.5.1.3. If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:</p> <ol style="list-style-type: none"> Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms; Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and Outlines required training for security personnel. 	<p>The Unki agreement with security companies sets out principles that are consistent with the Voluntary Principles on Security and Human Rights and prohibits the use of fire arms.</p> <ul style="list-style-type: none"> - The agreement outlines duties and obligations with respect to the provision of security in and around the mine. - The agreement outlines that security companies are required to train their personnel on Voluntary Principles on Security and Human Rights among other trainings. <p>● - Unki signed agreements with private security service providers do not include procedures on the use of force. The agreement refers to the Unki policies and procedures, however, the Unki procedure on the use of force (Effecting an arrest procedure) is not comprehensive. The Effecting an arrest procedure section 9.3 and 9.10 only addresses the use of force in so far as arresting of a suspect is concerned. The use of force is not covered beyond arresting of suspects, although mass unrest (riots, etc.) have been identified in the Unki Risk Assessment Matrix as being high-risk. The use of force policy does not address unrest.</p>
<p>3.5.1.4. If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or similar agreement with public security providers that includes similar provisions to those in 3.5.1.3.</p>	<p>✓ - Unki has signed an MOU with the public security service provider (Zimbabwe Republic Police -ZRP), MOU dated (20/10/16).</p> <ul style="list-style-type: none"> - The MOU states that the ZRP will discharge their policing duties and shall uphold the Zimbabwe constitution and the Unki Mine Voluntary Principles on Security and Human Rights. - The MOU also states that Unki will take all measures necessary to conscientize the ZRP on the mine's Voluntary Principles on Security and Human Rights.

		<ul style="list-style-type: none"> - It should be noted that Zimbabwe Republic Police officers patrol the immediate vicinity of the mine including the neighbouring communities as part of the community policing. The police are in some cases armed when they do community policing patrols depending with the risk. - Unki MOU with the Zimbabwe Republic Police (20/10/16) does not include Unki Mines' procedures on the use of force and firearms. However, it is not realistic to expect the Unki mine to press on ZRP too forcefully on this issue.
3.5.2.1.	The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment.	<ul style="list-style-type: none"> ✔ - Unki has a documented Voluntary Principles: Risk, Impact and Opportunities Assessment dated 10/10/18. ✔ - The Risk, Impact and Opportunities Assessment was reviewed on 08/05/19. ✔ - Risk assessment includes assessment of conflict situation, security provision, governance, socio economic issues and physical environment, among others.
3.5.2.2.	Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall: <ul style="list-style-type: none"> a. Follow a credible process/methodology; b. Be carried out and documented by competent professionals; and c. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice. 	<ul style="list-style-type: none"> ○ This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
3.5.2.3.	The scope of the security risk assessment shall include, but need not be limited to: <ul style="list-style-type: none"> a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups; b. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption); c. Analysis of current and potential conflicts or violence in the host country and affected communities; and d. Risks associated with equipment transfers. 	<ul style="list-style-type: none"> ✔ - Unki has a documented Voluntary Principles: Risk, Impact and Opportunities Assessment dated 10/10/18-reviewed on 08/05/19. ✔ - Risk assessment includes assessment of conflict situation, security provision, governance, socio economic issues and physical environment, among others. ✔ - The scope of the risk assessment includes security risks to workers and communities, political and security context analysis, and analysis of current and potential conflicts and violence in Zimbabwe. ✔ - The assessment extensively covers the political and security contexts. ✔ - The risk assessment does not cover risks associated with equipment transfers.
3.5.2.4.	The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective.	<ul style="list-style-type: none"> ✔ - Unki has some mitigation measures outlined in the VPSHR Risk Assessment (2018&2019). ✔ - Unki is implementing controls identified in the risk assessments. ✔ - The risk assessment has action items and specific timelines. ✔ - Unki implements the actions and monitors the time lines.

<p>3.5.2.5. If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform with requirements in IRMA Chapter 1.3.</p>	○	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>3.5.3.1. The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.</p>	☑	<ul style="list-style-type: none"> - Unki conducts criminal background checks on company security personnel and private security provider. - Unki conducts reference checks on company security personnel and private security provider. - Unki requires contracted private security companies to maintain security personnel files that include background checks. - The ambiguity of the requirement to perform due diligence to avoid hiring of personnel "credibly implicated in infringement of human rights" means that this part of the requirement cannot be scored and is not considered. (There is no way for Unki to know what this means precisely.)
<p>3.5.3.2. The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.</p>	☑	<ul style="list-style-type: none"> - Unki makes a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force. - Unki uses mainstream and social media to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.
<p>3.5.4.1. Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with particular reference to vulnerable groups, and the company's policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers.</p>	☑	<ul style="list-style-type: none"> - Unki provides training to internal and private security personnel. - The training covers respect for the human rights of mine workers and affected communities. - The training covers the use of force. - The training is provided annually. - Unki training for private security personnel does not make specific reference to vulnerable groups. However, given the ambiguity in definition of "Vulnerable groups" and how it is completely subject to interpretation, this cannot be objectively evaluated and is excluded from consideration.
<p>3.5.4.2. If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not</p>	☑	<ul style="list-style-type: none"> -Unki provides human rights training to Zimbabwe Republic Police Officers who enter the mine site. -The training records are documented.




<p>occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security.</p>		<ul style="list-style-type: none"> -The training covers the subject of human rights. -Unki only provides training on human rights to police officers who come to its site during the sampled period (January 2018-November 2019). -Unki management explained that the Zimbabwe Republic Police Officers receive training on the use of force, firearms and human rights as part of their routine training by Government of Zimbabwe.
<p>3.5.5.1. The operating company shall:</p> <ol style="list-style-type: none"> a. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force; b. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company's policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies; c. Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers; d. Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings; e. Provide medical assistance to all injured persons, including offenders; and f. Ensure the safety of victims and those filing security-related allegations. 		<p>Unki has documented procedures for documenting and investigating security incidents, however:</p> <ul style="list-style-type: none"> · The procedure does not take appropriate actions to mitigate and provide remediation for human rights impacts injuries or fatalities caused by security providers; · The procedure does not include reporting of security incidents, including credible allegations of human rights abuses by public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings; · The procedure does not include the requirement to provide medical assistance to all injured persons, including offenders; an · The procedure does not have a requirement to ensure the safety of victims and those filing security-related allegations.
<p>3.5.5.2. In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents.</p>		<p>Unki has not yet experienced security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers.</p>
<p>3.5.6.1. If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms.</p>		<p>Unki has a system in place to make information publicly available upon request and engage with stakeholders in response to requests.</p>
<p>3.5.6.2. The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights.</p>		<ul style="list-style-type: none"> - Unki has held consultation meetings with stakeholders on security issues relating to the perimeter fence of the mine. - Unki participates in the Shurugwi crime consultative meetings where local security and crime related issues are discussed. There is sufficient evidence to consider this to be done regularly. - Unki does not report to stakeholders annually on the company's security arrangements and its

		efforts to manage security in a manner that respects human rights.
3.5.6.3.	Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security.	<ul style="list-style-type: none"> - Unki informs its stakeholders about its grievance mechanism to raise concerns including those related to security. - Grievances are raised individually or by a group of stakeholders. - Unki addresses grievances raised by stakeholders. - The grievances and the solutions provided by Unki are documented.
3.5.6.4.	If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns.	<ul style="list-style-type: none"> - Unki informs its stakeholders about its grievance mechanism to raise concerns including those related to security. - Grievances are raised individually or by a group of stakeholders. - Unki addresses grievances raised by stakeholders. - The grievances and the solutions provided by Unki are documented.

Chapter 3.6—Artisanal and Small-Scale Mining

Basis for rating

3.6.1.1.	When the large-scale mining (LSM) operating company has identified the presence of artisanal and small-scale mining (ASM) entities on the LSM concession or in close proximity to LSM operations, the operating company shall carry out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring.	<ul style="list-style-type: none"> - No current evidence of scoping process and report regarding legal, social and environmental context. - Tributes currently collated on a map, with tributor details. - Collins Mwatahwa, Chief Geologist, compiled a report on 16/01/2019 documenting issues. - No documentation of legal requirements, nor social and environmental context.
3.6.2.1.	When the operating company has identified the presence of ASM on or in close proximity to its mining project, and where there is no material risk to company personnel, it shall: <ul style="list-style-type: none"> a. Make a good faith effort to engage with ASM entities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts (See IRMA Chapter 1.2); b. Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning; c. Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and d. Inform ASM entities and communities that there is an operational-level grievance mechanism available to raise concerns and resolve conflicts related to the LSM operation (See IRMA Chapter 1.4). 	<ul style="list-style-type: none"> - There has been limited engagement with ASM stakeholders. - Stakeholder engagement was undertaken with formal ASM on chromite seams. - Memo of Memorandum requested from Unki to provide estimates of ASM production, to levy payments on them. - EMA also engaged with ASMs to advise them of environmental impacts. - Unki engaged with ASMs to request them to close open pits created by them. Unki has undertaken rehab of legally mined sites, as illegal ASMs come in and undertake less responsible practices within such areas unless rehabilitation is undertaken. - Communities have lodged complaints about the impacts of ASM on them, without any benefits to the community. - No formal engagement by Unki with illegal ASMs.



		- Illegal ASMs have been considered from a resettlement perspective, but not beyond that. Illegal ASMs are reported to the District Administrator.
3.6.3.1.	The operating company shall ensure that mine security personnel are trained in respecting the human rights of individuals engaged in ASM activities, and members of affected communities.	 <ul style="list-style-type: none"> - Training provided to Unki security personnel related to all employers, communities, contactors etc. (including ASMs). No differentiation made between ASMs and other community members.
3.6.3.2.	The operating company shall demonstrate that it has considered opportunities to enhance positive safety, environmental and social impacts of ASM activities for the benefit of ASM entities and host communities.	 <p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
3.6.4.1.	<p>When the LSM mine sources minerals from or has other commercial relationships with ASM entities, the operating company shall:</p> <ol style="list-style-type: none"> Regularly assess the social and environmental risks and impacts related to the ASM entities with whom they have a commercial relationship; Collaborate with those ASM entities with whom it can legally and legitimately engage to develop and implement a plan to eliminate or mitigate the most significant risks, and over time, address other social and environmental risks related to those ASM operations; and monitor the effectiveness of mitigation strategies, and adapt plans as necessary to facilitate continued minimization of risks. 	 <ul style="list-style-type: none"> - Legal agreements were in place between Unki and the relevant tributors that hold surface (tributor) rights over Unki's lease area. - No formal engagement by Unki regarding environmental health and safety (EHS) beyond legal obligations in contracts between Unki and tributors. - The contractual obligations excluded any monitoring by Unki. - No recollection by Caston Musa of a plan to manage and mitigate EHS risks. - However, the contractual terms required payment of a 10% royalty of total gross value payable in US dollars (USD) for chromite won by the tributor from the mining location, as per the agreement payable by the 30th day of each month. Agreement included safety, health and environment (SHE) provisions regarding standard practice and relevant laws, rules and regulations, and for continual rehabilitation. But it does not include risk or impact assessment of ASM activities undertaken by Unki. - Unki Social Management Plan (Baseline Workplace Risk Assessment and Control (WRAC) – Unki Complex Oct 2019)(Sept 2018) specifies potential hazards or risks, a description of the unwanted event, current controls, likelihood of occurrence, and the consequence should the hazard/risk arise. Artisanal mining within the lease area and high level impacts on land degradation, human life and domestic animals, the human right to a safe environment were identified. Engagement with the Ministry of Mines (MoM) and Environmental Management Agency (EMA) for enforcement of regulatory requirements and rehabilitation of abandoned open pits are specified, but not rehabilitation targets are specified for degraded areas. - Unki has no plan to collaborate with ASMs regarding development and implementation of a plan to eliminate or mitigate significant risks and address these related to ASM operations.

		<ul style="list-style-type: none"> - No monitoring of EHS Plan implementation regarding ASM. - In conclusion, residual impacts remain and Unki is undertaking remediation and closure of abandoned tributor mining sites, but not undertaking any monitoring of the effectiveness of such actions. Unki isn't expected to now undertake an assessment of E&S risks and impacts related to ASM activities with whom they had a commercial relationship, but residual impacts and risks need to be addressed.
3.6.4.2.	When the LSM mine has commercial relationships with ASM entities that are located in conflict-affected or high-risk areas, the operating company shall carry out due diligence related to those ASM entities as required in IRMA Chapter 3.4.	<p>—</p> <p>Conflict-affected and high-risk area requirements of the IRMA Standard are not being applied during the launch phase.</p> <p>If the future conflict screening identifies that Unki mine (and ASM areas) are in a conflict-affected and high-risk area, then ASM will need to be included in any risk assessment.</p>

Chapter 3.7—Cultural Heritage


Basis for rating

3.7.1.1.	Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
3.7.1.2.	Screening, assessment and the development of mitigation measures and procedures related to the management of cultural heritage shall include consultations with relevant stakeholders.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
3.7.1.3.	Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
3.7.2.1.	Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities.	—	IRMA confirmed that during the launch phase, until additional guidance is available, mines can mark this requirement as "Not relevant" if significant changes to mining-related activities did not take place after the IRMA Standard went into effect in June 2018.
3.7.2.2.	If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the	●	- Mitigation measures proposed and implemented for the rock art, petroglyphs, graves and farm house identified, but no avoidance options assessed and no rationale for proposed mitigation measures documented.

	requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected.		
3.7.3.1.	<p>When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply:</p> <ol style="list-style-type: none"> Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it; Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it; Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage. 		<p>- Mitigation measures for rock art, petroglyphs, graves and farmhouse (non-critical replicable cultural heritage) proposed at a high level and implemented, but not comprehensively documented what avoidance options were considered and how mitigation should be practically implemented other than a chance find procedure being in place.</p>
3.7.3.2.	All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.		<p>- Name and institute of specialists provided in 2016 environmental and social impact assessment (ESIA) and 2010 Impali Housing Report, but no details of credentials. No documentation of professional/s appointed and credentials in 2003 environmental impact assessment (EIA).</p> <p>- However, based on the approach to and findings of the mitigation measures proposed and implemented, the specialists for these studies can be deemed as competent specialists with reasonable confidence who applied internationally recognised practices for the protection of cultural heritage.</p>
3.7.4.1.	<p>The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:</p> <ol style="list-style-type: none"> The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and Any removal of cultural heritage is conducted using the best available technique. 	—	No removal of tangible nonreplicable cultural heritage undertaken or proposed.
3.7.4.2.	All mitigation work involving tangible nonreplicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.	—	No removal of tangible nonreplicable cultural heritage undertaken or proposed.
3.7.5.1.	Except under exceptional circumstances, the operating company shall not remove,	—	Department of National Museums and Monuments led the process of assessment and







		<p>determined appropriate protective measures (not Unki). No removal was proposed or implemented.</p>
<p>3.7.5.2. When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:</p> <ul style="list-style-type: none"> a. Comply with the requirement 3.7.5.1; b. Comply with the protected area's management plan; c. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and d. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. 	<p>—</p>	<p>Unki is an existing mine.</p>
<p>3.7.5.3. IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).</p> <ul style="list-style-type: none"> · World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; · International Union for Conservation of Nature (IUCN) protected area management categories I-III; · Core areas of UNESCO biosphere reserves. 	<p>—</p>	<p>Unki is an existing mine.</p>
<p>3.7.5.4. An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:</p> <ul style="list-style-type: none"> a. The mine was developed prior to the area's official designation; b. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the 	<p>—</p>	<p>Unki is an existing mine.</p>

	<p>cultural values for which the area was designated or recognized; and</p> <p>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan.</p>		
3.7.5.5.	To safeguard irreplaceable cultural heritage and respect indigenous peoples' right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation.	—	Unki has not carried out new exploration or development in areas known to be inhabited by indigenous peoples living in voluntary isolation.
3.7.6.1.	Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development.	—	Unki has not carried out new exploration or development in areas known to be inhabited by indigenous peoples living in voluntary isolation. Therefore, Unki is not proposing to use cultural heritage for commercial purposes.
3.7.6.2.	The operating company shall not proceed with such commercialization unless it: <ul style="list-style-type: none"> a. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and b. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions. 	—	Unki has not carried out new exploration or development in areas known to be inhabited by indigenous peoples living in voluntary isolation. Therefore, Unki is not proposing to use cultural heritage for commercial purposes.
3.7.6.3.	Where the operating company proposes to use indigenous peoples' cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples.	—	Unki has not carried out new exploration or development in areas known to be inhabited by indigenous peoples living in voluntary isolation. Therefore, Unki is not proposing to use cultural heritage for commercial purposes.
3.7.7.1.	A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage.	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.
3.7.7.2.	If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for: <ul style="list-style-type: none"> a. Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed; b. Managing potential impacts to c. Allowing continued access to cultural sites, subject to consultations with affected 	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.

		<p>communities and overriding health, safety, and security considerations; and</p> <p>d. If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage.</p>
<p>3.7.7.3.</p>		<p>The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management.</p> <p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>




Principle 4: Environmental Responsibility–APPENDIX



RATING LEGEND
Description of performance





	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant
	Not scored




Chapter 4.1—Waste and Materials Management

Basis for rating

<p>4.1.1.1. The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities.</p>		<p>No overarching mine waste policy at corporate or site level has been provided for mineral and non-mineral wastes, including effluents.</p> <p>However, there is a waste management standard which contains procedural information and policy statements on overall management, waste segregation, recycling and zero waste to landfill by 2020.</p>
<p>4.1.1.2. The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:</p> <ul style="list-style-type: none"> a. Having the policy approved by senior management and endorsed at the Director/Governance level of the company; b. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities; c. Having procedures and/or protocols in place to implement the policy; and d. Allocating a sufficient budget to enable the effective implementation of the policy. 		<p>The mine is in compliance with conditions a) and c). However, the approved individual policies are not incorporated into an overarching waste policy at site level.</p> <p>There is a waste management standard which contains procedural information and policy statements on overall management, waste segregation, recycling and zero waste to landfill by 2020. This information is provided to employees as information sheets. This means b) is only met partially.</p> <p>There is an approved operational manual for the Tailings Storage Facility.</p> <p>The reference document AAP TRP Cost Estimate (March 6) is not sufficient to demonstrate that budget has been provided for the implementation of procedures or protocols company wide. d) is only met partially. As two of the clauses are met fully, and 2 are met partially, on a net basis this requirement is "Substantially Meets".</p>
<p>4.1.2.1. The operating company shall:</p> <ul style="list-style-type: none"> a. Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and b. Document and implement procedures for the safe transport, handling, storage and 		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>







disposal of those materials, substances and wastes.		
<p>4.1.3.1. The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities.</p>		<p>In regard to impacts, the environmental impact assessment (EIA) study conducted in 2003 provides a brief description of waste types and a prediction of potential impacts from solid (including hazardous waste) and liquid wastes. However, detailed assessment reports related to waste types particularly on acid rock drainage and metal leaching were not provided. The Baseline Workplace Risk Assessment and Control (WRAC) – Unki Complex (2019) identifies potential risks from wastes and there are supporting operational manuals for the tailings storage facility (TSF), Hazardous landfill and design and operating documents for the slag pile. This documentation is considered to be sufficient for the identification of impacts and risks that are present.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p> <p>The Unki Baseline Risk Assessment (November 2019) identified risks for wastes, including: Solid Waste (Hazardous/Non-hazardous) – Pollution potential and community scavenging, Pollution from leachate. Hydrocarbons – Transportation, Storage and Distribution of hydrocarbons. Loss of containment, spillages, explosions, and fires, Spillages and leakages of hydrocarbons into the environment. Emulsion - Loss of containment of chemicals. Slag Waste – Slag spillage while being transported leading to the exposure of the public to sharp particles of slag and pollution.</p>
<p>4.1.3.2. The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:</p> <ol style="list-style-type: none"> a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW); b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include: <ol style="list-style-type: none"> i. Analysis of petrology, mineralogy, and mineralization; ii. Identification of geochemical test units; iii. Estimation of an appropriate number of samples for each geochemical test unit; and iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit. c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility; 		<p>The mine is compliant with conditions a), c), d) and e). Refer to Unki Mine - Groundwater Model (September 2018) and the TSF Design Report and Operational Maintenance and Surveillance (OMS) Manual addresses.</p> <p>However, the detailed assessment report on Acid Rock Drainage and Metal Leaching (ARD&ML) was not provided. Only a memo on ARDML which indicates that the material is not acid generating and has low potential for metal leach was provided.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>

<p>d. Water balance and chemistry mass balance models for each facility; and</p> <p>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants.</p> <p>4.1.3.3. The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:</p> <ul style="list-style-type: none"> a. Detailed engineering reports, including site investigations, seepage and stability analyses; b. Independent technical review (See criteria 4.1.6) c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment; d. Descriptions of facility design criteria; e. Design report(s); f. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns; g. Master tailings placement plan (based on life of mine); h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report; i. Facility water balances (See also 4.1.3.2.d); and j. Dam breach inundation (if applicable) and waste rock dump runout analyses. 		<p>For the Tailings Storage Facility (TSF) the company has demonstrated that they have documentation (i.e. TSF design report and OMS) prepared by a competent independent engineer which includes: a design engineering report (site investigations, site selection, seepage analysis, design criteria, facility classification risk assessment, sensitivity analysis, long term placement strategy and water balance based on hydrological/Hydrogeological studies. These documents fully meet the requirements.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>
<p>4.1.3.4. Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.</p>		<p>The documentation provided during the audit provides evidence that facility management plans are regularly updated for the TSF and other waste management facilities.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>
<p>4.1.3.5. Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected.</p>		<p>Documentation provided during the audit for the TSF and Unki Mine - Groundwater Model (September 2018) reflects the use of predictive models in accordance with Good International Industry Practice (GIIP). The Unki TSF Code of Practice outlines the requirements for continuous classification, prediction and management of wastes and satisfies the requirements. The TSF and Groundwater model are being updated during 2020.</p>
<p>4.1.4.1. Critical A risk-based approach to mine waste assessment and management shall be implemented that includes:</p>		<p>Refer to Unki Mine - Groundwater Model (September 2018) and Unki Baseline Risk Assessment (November 2019). The mine provided documentation that indicated that a risk assessment, safety classification and</p>

		<p>a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;</p> <p>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;</p> <p>c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and</p> <p>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).</p>
<p>4.1.4.2. The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:</p> <p>a. Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses;</p> <p>b. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives;</p> <p>c. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications;</p> <p>d. Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative;</p> <p>e. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and</p> <p>f. Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management).</p>		<p>consequences analysis has been conducted in accordance with the requirements.</p> <p>The mine is compliant with conditions a), b) and c) but hydrology aspects need to be studied in more detail in terms of impacts to aquatic ecology, surface water quality and sediments.</p> <p>To be compliant with condition d) updated documents for TSF and Hydrogeological model need to be seen when completed in 2020.</p> <p>See Justification 4.1.3.3. There is evidence that site selection assessment and alternative waste practices have been investigated for the operation of the mines waste management facility.</p> <p>The general layout and development plan shows alternative options for the expansion of the TSF as well as an additional 6 locations under consideration. In the end, the option to increase the TSF walls and dam was chosen.</p> <p>There are also 6 locations for consideration for the return dam and several locations for an additional storage dam.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site, however, details of the proposed incinerator and potential impacts from air emissions and disposal of ash were not provided.</p> <p>The mine is in compliance with conditions a) and b).</p> <p>Documented evidence of a site wide "fatal flaw" analysis and Multiple Accounts Analysis (MAA) as per the requirement was not provided.</p>
<p>4.1.5.1. Critical Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
<p>4.1.5.2. Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:</p> <p>a. Priority shall be given to source control measures to prevent generation of contaminants;</p> <p>b. Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent</p>		<p>The mine operates within a waste management hierarchy of identification, characterisation, quantification, prevention, minimisation, reuse/recycling, waste collection and transfer and responsible disposal which is outlined in their waste management standard.</p> <p>The mine is also planning to raise the TSF, expand the Pollution Control Dam and build a Water Retention Dam for the site. These measures are</p>

<p>or minimize the movement of contaminants to where they can cause harm; and</p> <p>c. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes.</p>		<p>considered sufficient to prevent release of contaminated waters to the environment under emergency conditions (i.e. TSF main wall risks) and significant stormwater rainfall events.</p> <p>The mine has been regularly monitoring from a series of ground water monitoring locations around the TSF and this data is used in the Groundwater Model for the site which is to be updated in 2020. The mine regularly monitors the effectiveness of the waste management system implemented at the site. The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste faculties at the site.</p>
<p>4.1.5.3. For high-consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide.</p>	<p>✔</p>	<p>The critical control framework is in place for the TSF, including emergency preparedness for catastrophic failure.</p> <p>The hazardous waste facility and slag dump also have preventive controls in place such as daily cover and leachate collections ponds/sumps. These facilities are also monitored and corrective actions are regularly taken.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>
<p>4.1.5.4. Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling and other relevant information.</p>	<p>✔</p>	<p>See justification for 4.1.4.1.</p> <p>The mine is generally in compliance with this requirement for the TSF, landfill and slag dump operations.</p> <p>The Site Specific Report compiled in March 2019 addressed relevant aspects of this IRMA condition, however, Annex 1 of the report which details the updated waste inventory is missing.</p> <p>The Departmental Waste Registers 2019 and Waste Collection Schedule were shown to the auditor on-site but could not be found in documentation provided by Unki.</p> <p>These considerations should also be given to the proposed incinerator.</p>
<p>4.1.5.5. The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:</p> <p>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters;</p> <p>b. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with</p>	<p>●</p>	<p>The company has compiled an Operation, Maintenance and Surveillance (OMS) manual for the TSF. There is also an operators' manual for the hazardous waste facility and the slag dump has suitable mitigation control measures to manage potential risks.</p> <p>However, the TSF OMS document supplied is missing the following appendices which are considered necessary for full compliance: Appendix J Piezometric Information, Appendix K Issue Based Risk Assessment, Appendix L Safe Operating Procedures and Appendix M Emergency Preparedness Plan and Emergency Management Plan.</p> <p>These considerations should also be given to the proposed incinerator.</p>

<p>performance criteria, company standards, host country law and sound operating practices;</p> <p>c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility;</p> <p>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and</p> <p>e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost.</p>		
4.1.5.6.	Critical	On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:
	a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);	b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);
	c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and	d. Inform the management review to facilitate continual improvement (see 4.1.5.8).
	✔	<p>The mine conducts regular monitoring on a monthly, quarterly and annual basis and prepares respective monitoring reports and environmental management plans for regulators (Environmental Management Agency) and engineering consultants.</p> <p>This information informs the risk baseline approach on an annual basis and covers all waste management facilities.</p> <p>The hydrogeological model and TSF documentation is being updated in 2020.</p>
4.1.5.7.	The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities.	✔
	<p>The mine operates within a waste management hierarchy of identification, characterisation, quantification, prevention, minimisation, reuse/recycling, waste collection and transfer and responsible disposal which is outlined in their waste management standard.</p> <p>The mine is also planning to raise the TSF, expand the Pollution Control Dam and build a Water Retention Dam for the site. These measures are considered sufficient to prevent release of contaminated waters to the environment under emergency conditions (i.e. TSF main wall risks) and significant stormwater rainfall events.</p> <p>The mine has been regularly monitoring from a series of ground water monitoring locations around the TSF and this data is used in the Groundwater Model for the site which is to be updated in 2020. The mine regularly monitors the effectiveness of the waste management system implemented at the site. The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>	

4.1.5.8.	<p>The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:</p> <ol style="list-style-type: none"> Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and Be documented, and the results reported to an accountable executive officer. 		<p>The critical control framework is in place for the TSF, including emergency preparedness for catastrophic failure.</p> <p>The hazardous waste facility and slag dump also have preventive controls in place such as daily cover and leachate collections ponds/sumps. These facilities are also monitored and corrective actions are regularly taken.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>
4.1.6.1.	<p>The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle.</p>		<p>See justifications 4.1.3.3 and 4.1.4.2</p> <p>For the Tailings Storage Facility (TSF) the company has demonstrated that they have documentation (i.e. TSF design report and OMS) prepared by a competent independent engineer which includes: a design engineering report (site investigations, site selection, seepage analysis, design criteria, facility classification risk assessment, sensitivity analysis, long term placement strategy and water balance based on hydrological/Hydrogeological studies. These documents fully meet the requirements.</p> <p>The Site Specific Strategy Report provides information of existing waste streams, waste facilities and predictions/approaches to managing these and any new waste facilities at the site.</p>
4.1.6.2.	<p>Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body.</p>		<p>See Justification for 4.1.3.4, 4.1.5.6 and 4.1.5.7.</p> <p>For the TSF, an independent review was conducted in 2016 and the next one is due in early 2020.</p> <p>It is indicated in the Operating Manual for Hazardous Management Facility that annual inspections are required by an "independent persons" in the presence of the landfill manager and operations manager. Reviews do not do not specify when a 3-person panel is required.</p>
4.1.6.3.	<p>Independent reviewers shall be objective, third-party, competent professionals.</p>		<p>See Justification 4.1.3.4, 4.1.5.6, 4.1.5.7 and 4.1.6.2.</p>
4.1.6.4.	<p>Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner.</p>		<p>See Justification 4.1.3.4, 4.1.5.6, 4.1.5.7 and 4.1.6.2.</p> <p>Additionally, during the audit it was demonstrated that the operations general manager and executive account officer are informed and monetary adjustments are made in accordance with the independent reviews.</p>
4.1.6.5.	<p>The operating company shall develop and implement an action plan in response to commentary, advice or recommendations from an independent review, document a rationale for any advice or recommendations that will not be implemented, and track progress of the plan's implementation. All of this information shall be made available to IRMA auditors.</p>		<p>See Justification 4.1.3.4, 4.1.5.6, 4.1.5.7 and 4.1.6.2.</p> <p>The company regularly reviews and updates its operating procedures and manuals based on advice from independent engineers and external bodies.</p>





4.1.7.1.	Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities.	—	As Unki is an existing mine, they can't turn back the clock to improve this early-phase engagement.
4.1.7.2.	Emergency preparedness plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers' representatives, and in collaboration with first responders and relevant government agencies. (See also IRMA Chapter 2.5).	✓	Refer 2.5: Emergency Preparedness & Response and Chapter 3.3 Community Emergency Response Plan. The Community Engagement Forum Procedure (2015) makes reference to the Unki Community Emergency Response Plan. The TSF documentation also addresses Emergency Preparedness and Response Planning and mock trials are regularly conducted by the mine for a number of critical aspects which are detailed in the TSF Drill Action Plan.
4.1.7.3.	Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. (See also IRMA Chapter 2.5).	✓	In September 2019 the company conducted a TSF mock drill in relation to the catastrophic failure of the dam with the Gutsaruzhinji community, employees and local emergency services to test the system.
4.1.7.4.	If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies.	✓	The Community Engagement Forum Procedure is followed in order to have a formal community engagement at a quarterly frequency to engage stakeholder Issues of material concern. Additionally, the Community Emergency Preparedness and Response Plan indicates that Unki has procedures to communicate internal and external notifications regarding incidents. The Anglo American Platinum Crisis Management Team (Corporate Office) is responsible for media and stakeholder communication.
4.1.8.1.	Critical At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA.	✓	Designated facilities not constructed using riverine, submarine or lake disposal of mine waste materials.

Chapter 4.2—Water Management





Basis for rating

4.2.1.1.	The operating company shall identify water users, water rights holders and other stakeholders that may potentially affect or be affected by its mine water management practices.	✓	The description in the main environmental impact assessment (EIA) report has identified water rights and users (water census) for both surface and groundwater. Evidence that the mine consults with relevant stakeholders on water use was provided in the meeting minutes from October 2019. The EIA is outdated (from 2003), however this IRMA requirement does not stipulate any time horizon for relevance. Given the generality of the IRMA requirement we have to find "Fully Meets."
4.2.1.2.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices.	✓	Information provided demonstrates that the mine has considered the mine's water requirements between the period of 2014 - 2023 including downstream user requirements of the Lucilia Poort Dam and the construction of another dam in the Umtebekwana River at the Tanana Junction.

		<p>In addition Unki responded to community complaints to resolve access issues downstream of the mine. Given the vagueness of the requirement, it is hard to see how this would not satisfy the need to "collaborate with stakeholders".</p> <p>Several water studies exist, but focus is more on meeting mine's water needs.</p> <p>The Biodiversity Baseline & Monitoring protocols are underpinned by Anglo American's Biodiversity standard and requires the study to being in line with IFC PS 6 and guidance notes as well ICMM sectoral guidance. The January 2020 Biodiversity baseline report includes monitoring of fish species relevant to ecosystem uses of the water.</p> <p>The Assessment of Water Sources to Meet Demands 2014 - 2023 and other supporting documents were provided, as well as evidence of engagement with communities for downstream water access and borehole repairs that have occurred.</p>
<p>4.2.1.3. The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels, and shall take steps to contribute positively to local and regional water stewardship outcomes.</p>	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
<p>4.2.2.1. The operating company shall gather baseline or background data to reliably determine:</p> <ul style="list-style-type: none"> a. The seasonal and temporal variability in: <ul style="list-style-type: none"> i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project; ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwater) that may be affected by the mining project; and b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project. 	<p>⊕</p>	<p>The description in the main EIA report provides sufficient detail on the physical and chemical baseline characteristics for both surface and groundwater.</p> <p>Water flow data in 2003 EIA (Tables 8 - 11) are for catchments rather than specific locations that could be affected by the mining project, so temporal variability at sites cannot be easily evaluated.</p> <p>Baseline surface water quality data in 2003 EIA (Table 12) shows some attempt to determine temporal variability at 3 of 9 locations, but many parameters were not determined (especially metals).</p> <p>The 2016 smelter EIA has similar limitations: Table 20 has results for 20 parameters in surface water but not for the comprehensive IRMA list and was only sampled once (no date provided). Groundwater sampling (Table 23) has more information on temporal variability, but lab results are questionable (e.g., high sulfide and dissolved oxygen (DO) and lack of quality assurance/quality control (QA/QC) information).</p>
<p>4.2.2.2. The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:</p>	<p>⊕</p>	<p>The EIA process for 2003 and 2016 does not contain a scoping component as per the IRMA requirement. The 2018 Delta H Groundwater Model report does evaluate mining sources and how they may pose a risk to water quality. The mine's use of water and effects on water quantity for stakeholders (rather than for the mine) is less well examined, and any scoping process related to</p>

		<p>a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and</p> <p>b. The mine's use of water, and any mining activities that may affect water quantity.</p>
<p>4.2.2.3. Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:</p> <p>a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources;</p> <p>b. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels);</p> <p>c. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and</p> <p>d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure.</p>	 	<p>the evaluation does not appear to have involved collaboration with relevant stakeholders.</p> <p>See Justification 4.2.2.1.</p> <p>Documentation for the tailings storage facility (TSF) includes the development of a water balance model and numerical modelling for seepage analysis and groundwater fate contaminant transport. However, this is not reflective of the entire mine water site characteristics.</p> <p>The baseline Workplace Risk Assessment and Control (WRAC) (2019) identifies water risks associated with inadequate retention capacities in TSF/fresh water supplies, increased water demand, handling of TSF/PCD waters, sewage effluents, catastrophic failure of TSF/supply dam and pollution of surface and groundwater.</p> <p>The 2018 Delta H Unki Mine Groundwater Model report contains most elements needed to meet this IRMA requirement, with the exception of a numeric analysis of spills to the river from the PCD. A Hydrogeological Modelling Study was conducted in 2018 and the mine is in the process of engaging consultants Water Hunters CC to undertake further assessment of the groundwater system to determine the extent of impacts on resources and the mine environment. This work is being carried out between 1/11/2019 and 31/10/2020.</p>
<p>4.2.2.4. Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected.</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
<p>4.2.3.1. The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.</p>		<p>Following emergency release of supernatant water in 2011, 2015 and 2017 from the TSF, the environmental management agency (EMA) required that Unki implement a series of sedimentation ponds for treatment prior to discharge into the receiving waters, which was done.</p> <p>A water retention pond is in the process of being designed/commissioned to prevent any release of supernatant waters from the TSF.</p> <p>An assessment of the existing stormwater management system was completed in April 2018 and the pollution control dam for the smelter in August 2019. These structures are being implemented.</p> <p>There are also water pollution control dams for leachates from the hazardous landfill and slag dump.</p> <p>However, recommendations in the 2018 Delta H Groundwater Model report have not yet been implemented, including: QA) procedures for water quality samples, expanding the monitoring</p>

		<p>network downgradient of the mine, adding boreholes to evaluate groundwater elevations, regularly updating model and examining pollution sources and plumes; examining water treatment of acidic tailings water is also suggested.</p> <p>Evidence of collaboration with relevant stakeholders was not presented.</p>
<p>4.2.3.2. If a surface water or groundwater mixing zone is proposed as a mitigation strategy:</p> <ul style="list-style-type: none"> a. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and b. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum: <ul style="list-style-type: none"> i. Surface water or groundwater mixing zones are as small as practicable; ii. Water in a surface water mixing zone is not lethal to aquatic life; iii. A surface water mixing zone does not interfere with the passage of migratory fish; iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable. 	<p>—</p>	<p>Not Relevant because the surface water and groundwater mixing zone is not used.</p>
<p>4.2.3.3. Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:</p> <ul style="list-style-type: none"> a. Being maintained at baseline or background levels; or b. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). 	<p>⊕</p>	<p>Water discharges from the mine operations to receiving water are assessed by the University of Zimbabwe in accordance with the Zimbabwean legal requirements. These reports suggest that there are exceedances experienced for turbidity, suspended solids, conductivity and total dissolved solids, phenolic compounds, chemical oxygen demand and fluoride. It is difficult to argue it is being maintained at safe levels if it regularly exceeds regulatory thresholds.</p>

<p>4.2.3.4. Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2).</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
<p>4.2.4.1. Critical (a through e) The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:</p> <ol style="list-style-type: none"> 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); Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics; Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics; Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities; Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables. 		<p>The mine has established monitoring locations and conducts monthly/quarterly and annual collection/reporting of surface water, ground water and effluents and provided evidence of this for the years 2017, 2018 and 2019. However, the Unki Mine Ground and Surface Water Monitoring Procedure (2010 and 2013) is not detailed. Appendices are missing. Unclear what parameters are monitored from this plan.</p> <p>4.2.4.1.a: More surface and ground water monitoring locations are needed, as noted by Delta H (2018 Groundwater Model report) and Anglo (wants more wells at TSF); Unki does not monitor springs/seeps.</p> <p>4.2.4.1.b: Monitoring frequency will not capture seasonal/storm event effects; opportunistic monitoring not planned.</p> <p>4.2.4.1.c: Trigger levels are established for the TSF "activities,"</p> <p>4.2.4.1.d: Quality/quantity of mine-affected waters destined for irrigation measured. Sampling of stream sediment and measuring total and dissolved metals in stream samples proposed.</p> <p>4.2.4.1.e: Monitoring procedure is missing a table with analytes, analytical method, detection limit, and QA/QC documentation is missing from each lab report.</p> <p>4.2.4.1.f: Zimbabwean labs must be used by govt order. Lab is accredited by the South African National Accreditation Service.</p>
<p>4.2.4.2. Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis.</p>		<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
<p>4.2.4.3. The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:</p>		<p>There is evidence that the mine is addressing incidents related to monitoring of water quantity which effects the local communities. However, it is not clear if local representatives have been involved in the monitoring of water quality</p>

	<p>(surface and ground water) or that the cost of the communities' involvement has been covered.</p>
<p>4.2.4.4. Critical The operating company shall develop and implement an adaptive management plan for water that:</p> <ul style="list-style-type: none"> 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. 	<p>Unki's plan for incident reporting, which is part of their Environmental Monitoring Plan, functions like an adaptive management plan for the tailings impoundment.</p> <p>The SRK 2018 Operating, Maintenance, Surveillance report has a Trigger Action Response Plan (Appendix I), which is essentially an adaptive management plan for tailings.</p> <p>Unki has triggers and responses for the TSF.</p> <p>The mine has undertaken predictive water quality and fate transport modelling and developed mitigation measures for current and future operations to minimize releases to the environment.</p> <p>A site-wide water adaptive management plan is absent. Creating one would require identifying predicted impacts on current and future uses of water and natural resources.</p> <p>The current requirement definition is met by the existing adaptive management plans and monitoring. There is no specific scope required in the requirement or definition to which (or how many) impacts should be included in the adaptive water management plan. Technically any one of the plan components are sufficient to meet the requirement specifications.</p> <p>Anglo would need to develop a plan that meets IRMA guidelines for 4.2.4.4 (b) including target dates for when Unki plans to meet implementation.</p> <p>The IWBSM manual includes monitoring frequency and parameters, as well as quality control procedures. The TSF is identified as posing the greatest risk of contamination and, as a result, monitoring is correctly focused on the TSF. The OMS for the TSF contains TARP criteria, enabling the Project to demonstrate that the requirements for this criterion are substantially met. These require minor augmentation to collate the plans and include timeframes for revisions and target dates</p>
<p>4.2.4.5. Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes.</p>	<p>An overall water management plan for the mine was not provided. However, the mine does have the 2019 Baseline WRAC spreadsheet and an EMP prepared in 2003 and the management of water related issues for the Raw Water Supply, TSF, Pollution Control Dam, slag dump, hazardous landfill and stormwater system is addressed in separate reports.</p>

		<p>The mine also conducted quarterly and annual reporting to regulators and Anglo American at a corporate level.</p> <p>The Baseline WRAC details the nature of the event, location, hazard/Risk, Description of event, Controls, Likelihood of event, Consequence, Risk Rating and Annual Evaluations. This document appears to form the overall basis for assessments, design and management related to the entire mine's operation.</p> <p>Although the Baseline WRAC has many elements of an AMP, no evidence was provided in report format that the plan was revised regularly, or the effectiveness of the actions was evaluated.</p>
4.2.4.6.	Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans.	<p>○</p> <p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
4.2.5.1.	<p>The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities:</p> <ol style="list-style-type: none"> Monitoring data for surface water and groundwater points of compliance; and Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations. 	<p>○</p> <p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit</p>
4.2.5.2.	The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders in the event that there are changes in water quantity or quality that pose an imminent threat to human health or safety, or commercial or natural resources.	<p>☑</p> <p>There is evidence that the mine is addressing incidents related to monitoring of water quantity which affect the local communities through their Emergency Preparedness and Response Plan. Relevant issues include catastrophic failure of the Lucilia Poort water dam and the TSF dam. Unki met with communities on emergency planning and response in January 2019 (presentation provided).</p> <p>Unki interacts with an Unki-selected community committee, including an emergency committee related to potential inundation from a dam failure. Some community members said the emergency preparedness training from Unki has been good. Most relevant issue for 4.2.5.2 is training in response to failure of the water supply dam. However, it is only recently that the TSF drill plan was implemented with the community.</p>
4.2.5.3.	The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders.	<p>☑</p> <p>Some water management issues are discussed with stakeholders, especially with EMA (as required), and some discussions are held with the communities through workshops. Given the ambiguousness of the term "stakeholders", this is satisfactory to achieve "Fully Meets".</p>

Chapter 4.3—Air Quality

Basis for rating

4.3.1.1.	The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations.	✓	<p>- The Smelter environmental and social impact assessment (ESIA) included collection of baseline air quality data around the project site to determine the likely potential for air pollutants in the area.</p> <p>- A screening air quality model was used in the ESIA to assess the air quality impacts. Quarterly air quality monitoring is conducted on an ongoing basis.</p>
4.3.1.2.	During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area.	✓	Baseline air quality was evaluated at a variety of sites for a variety of pollutants.
4.3.1.3.	If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts.	✓	The baseline air quality monitoring and ongoing quarterly stack and ambient monitoring is sufficient to "assess" the "significance of potential impacts", as it gauges the ambient pollution and the contribution of the smelter to that pollution, at least indirectly. Given the vagueness of the term "assessment" and "significance of potential impacts" in this requirement, we must give a Fully Meets given the work done by Unki in this area.
4.3.1.4.	The assessment shall include the use of air quality modeling and monitoring consistent with widely accepted and documented methodologies to estimate the concentrations, transport and dispersion of mining-related air contaminants.	✓	<p>There is no refined assessment done for the entire operation using appropriate internationally accepted models to adequately assess impacts. Airshed modeling report looked at SO₂ only and for 1 stack.</p> <p>There was no assessment of cumulative impacts from all the sources.</p> <p>Application of "refined" dispersion modelling using models such as AERMOD would be necessary to adequately assess impacts, but this has not been undertaken including the application of longer averaging times. However, given the vagueness of the IRMA definition, which does not mandate any specific type of modeling, we have to evaluate this as "Fully Meets".</p>
4.3.2.1.	Critical If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.	✓	<p>An air quality monitoring program is in place, including dust monitoring and quarterly stack and ambient air quality monitoring at multiple sites. In addition, the smelter environmental impact assessment (EIA) report summarizes baseline air quality prior to the smelter construction. This is a plan in practice, even though it is not a single document and approach.</p> <p>Additionally, the mine's impact on local air quality is clearly not "significant" by any reasonable consideration (see discussion below). Given this fact, it is unclear why Unki would need a detailed plan according to this IRMA requirement.</p> <p>Smelter Stack emissions of particular matter (PM) are low: with stack monitoring never exceeding 54 mg/m³, which is within the Zimbabwean defined "blue" level stack threshold (60 mg/m³).</p>

Smelter Stack emissions of sulfur oxides (SO_x), however, are quite high, always in the government defined “red” band, with stack concentrations never below 700 mg/m³ when the smelter was running.

But SO_x were never detected in any air quality (AQ) Monitoring survey, either in the baseline or in an audited sample of 3 quarterly AQ monitoring results. This is true even for the highest-risk area modeled in a dispersion result (a nearby ridge). None of the sensors in sensitive receptor areas (a nearby community) ever detected any measurable SO_x concentration.

Nor did 11 of 12 AQ Monitoring stations detect any nitrogen dioxide (NO₂) or carbon monoxide (CO).





While PM₁₀ concentrations are very high in all quarterly monitoring results (as high as 1,470 ug/m³ – in one quarter, every reading was over 100 ug/m³), PM_{2.5} concentrations never exceeded 30 ug/m³ in quarterly monitoring. PM₁₀, however, is not the most problematic for health impacts – and these PM_{2.5} concentrations are considered “Moderate” or better using typical AQI ratings. For reference, according to the Zimbabwean government, PM₁₀ and PM_{2.5} should not respectively exceed 50 and 25 ug /m³ as a 24-hour average.

Furthermore, the highest PM_{2.5} concentrations ever recorded in the baseline measurements, prior to the smelter construction. It was extremely high (>1,000 ug/m³) in the baseline survey at some stations.

What this indicates is that the mine is located in a location which has region-wide PM pollution, it does not contribute meaningfully to this regional problem. The main emission from the stack, SO_x, is not detectable in the ambient setting. The highest concentrations of PM_{2.5} were detected prior to any smelter emissions.

Dust emissions from trucks do occur, but are subject to monitoring. However, this monitoring doesn't track dust concentrations, only deposition. But given the lack of transport of SO_x from the stack, it is difficult to imagine that dust would lead to “significant potential impacts” in surrounding communities.

Overall, while PM pollution is a regional problem, is it not possible to attribute this issue to the mine, which does not contribute to pollution even in its immediate proximity. The fact that baseline PM_{2.5} displayed the very highest concentrations indicates the smelter has nothing to do with local PM pollution. Based on the conclusion of the EIA and AQ monitoring, no “significant potential impacts” can be stated to exist. The existing monitoring plans should be continued, but there is not a need for any additional management plan besides what exists.

<p>4.3.2.2. Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life.</p>		<p>Quarterly schedule for stack and ambient air quality monitoring is implemented.</p>
<p>4.3.3.1. The operating company shall monitor and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring.</p>		<p>- Capability Statement of consultants (Toltec) provided, but qualifications of relevant specialists was not included</p> <p>- Limited information in ambient air quality report/s on methods used, duration, quality assurance/quality control (QA/QC), frequency etc. limited our ability to make inferences on the level of competency and training of the air quality monitoring personnel.</p> <p>Consequently, it was not possible to assess adequacy of the monitoring results.</p>
<p>4.3.3.2. Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results.</p>		<p>- Sampling locations reflect sources and the majority of key receptors, but the staff accommodation south-west of the smelter that is near downwind in terms of the prevailing wind direction is not included.</p> <p>- 2019 Q3 Air Monitoring Results.pdf reflects the staff accommodation in the report as a potential receptor, but it was not a sampling site. No monitoring of dust concentrations around the site.</p>
<p>4.3.4.1. New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:</p> <ol style="list-style-type: none"> a. If a mine is located in an air shed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or b. If a mine is located in an air shed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards, and make incremental improvements to the air quality in the air shed that are at least equivalent to the mining project's emissions. 		<p>During IRMA's Launch Phase, this requirement is not being scored. Instead, IRMA is asking mine sites to share information on what air quality criteria or emissions standards, if any, they are required to meet, and/or whether or not they are using utilizing a risk-based approach (e.g., 4.3.4.2) to managing their air emissions (either in addition to having to meet air quality criteria, or lieu of having to meet them). The information gathered about what approaches are being used, and the effectiveness at those approaches, will help IRMA to design a requirement or requirements that align with best practices for managing air emissions to protect human health and the environment.</p>
<p>4.3.4.2. As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:</p> <ol style="list-style-type: none"> a. New and existing mines shall comply with host country air quality standards at a 		<p>During IRMA's Launch Phase, this requirement is not being scored. Instead, IRMA is asking mine sites to share information on what air quality criteria or emissions standards, if any, they are required to meet, and/or whether or not they are</p>

<p>minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard;</p> <p>b. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply;</p> <p>c. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and</p> <p>d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines.</p>		<p>using utilizing a risk-based approach (e.g., 4.3.4.2) to managing their air emissions (either in addition to having to meet air quality criteria, or lieu of having to meet them). The information gathered about what approaches are being used, and the effectiveness at those approaches, will help IRMA to design a requirement or requirements that align with best practices for managing air emissions to protect human health and the environment.</p>
<p>4.3.4.3. Dust deposition from mining-related activities shall not exceed 350 mg/m²/day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination.</p>	○	<p>During IRMA's Launch Phase, this requirement is not being scored. While there is agreement among IRMA sectors that measuring dust emissions from mine sites is important, there is not consensus on what is the appropriate dust emission standard for protecting human health and the environment. IRMA is asking mine sites to share information on dust issues, regulatory requirements and management practices.</p>
<p>4.3.5.1. The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available, or made available to stakeholders upon request.</p>	☑	<ul style="list-style-type: none"> - Unki has high-level EMP based on the findings of the 3 EIAs - Unki prepares quarterly monitoring reports for submission to the regulator, Environmental Management Agency (EMA), based on data collected and performance in relation to the requirements of the EMP - Results are communicated to the local stakeholders through social performance to community members and through internal SHE meetings for employees and business partners - Unki confirmed that they would make the EMP and monitoring results available to other stakeholders upon request

Chapter 4.4—Noise and Vibration

Basis for rating

<p>4.4.1.1. The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project's noise and/or vibration. Screening is required at all new mines, and also at existing mines if there is a proposed change to the mine plan that is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels.</p>	—	<p>This requirement has been rated as "Not Relevant" based on IRMA guidance, which says that existing mines have the option to mark this as "Not Relevant." As a result, the requirement will not factor into the score for this chapter.</p> <p>IRMA recognizes that certain best practices, such as screening for potential noise impacts, may not have been widely used or expected at the time that changes were proposed at existing mines. So if proposed changes to mine plans occurred prior</p>
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			to September 2019, mines have the option of marking this requirement as not relevant.
4.4.1.2.	If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors.	—	This requirement has been rated as "Not Relevant" based on IRMA guidance, which says that existing mines have the option to mark this as "Not Relevant." As a result, the requirement will not factor into the score for this chapter. IRMA recognizes that certain best practices, such as establishing baseline noise levels may not have been widely used or expected at the time that changes were proposed at existing mines. So if proposed changes to mine plans occurred prior to September 2019, mines have the option of marking this requirement as not relevant.
4.4.2.1.	If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00 (i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are necessary and/or appropriate because of local, cultural or social norms.	✓	Noise monitoring data indicate ambient noise levels conform with the applicable standards. 'Buy quiet' policy, according to which any equipment with noise generation over 105 dB should be phased out to reduce noise at source by 31 December 2013. Potential sources of noise include drill rigs, fans, trucks, ore silos. No complaints from communities regarding noise or vibration.
4.4.2.2.	The following exceptions to 4.4.2.1 apply: a. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or b. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met.	—	No evidence was provided of accurate baseline ambient noise levels (against which noise levels can be assessed). Ambient noise level monitoring was undertaken on 28 November 2019. No additional monitoring data were provided. Based on ambient levels when mine is operating, the baseline ambient noise levels would be below 55 dBA (day) and 45 dBA (night).
4.4.2.3.	If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA.	—	Noise receptors are not limited to industrial or commercial receptors.
4.4.2.4.	If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows: a. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5% of blasts over a 12-month period; b. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and	—	Not Relevant given there is no indication that blasting impacts human receptors other than site personnel.

	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.		
4.5.2.1.	The operating company shall comply with emissions quantification methods described in a widely accepted reporting standard, such as the Greenhouse Gas Protocol Corporate Standard or the Global Reporting Initiative's GRI 305 emissions reporting standard.	⊕	<ul style="list-style-type: none"> - Requirements for quantification and reporting were specified. However, only partial screenshots of the GHG emissions quantification were provided. This limited the ability to review details, calculations, assumptions, data sources, etc. - Surface and underground fuel usage data was provided, but no information on coal usage at the flash dryers were provided. - No documentation provided that enabled assessment of the adequacy of the calculations, GHG estimates etc. However, reporting in the partial screenshots appeared thorough and followed GRI scope requirements.
4.5.3.1.	The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy.	⊗	
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.	⊗	
4.5.3.3.	The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies, and shall document the results of its investigations.	⊗	
4.5.4.1.	The greenhouse gas policy shall be publicly available.	⊙	<ul style="list-style-type: none"> - Group Climate Change Policy is available on the Anglo website. - There are also additional ample statements and commitments reflecting Anglo American's overall policies and strategies regarding climate change and greenhouse gas (GHG) emissions.
4.5.4.2.	On an annual basis, the operating company or its corporate owner shall: <ul style="list-style-type: none"> a. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards mine-site-level greenhouse gas reduction targets; and efforts taken to reduce emissions from the mining project and mining-related activities; and b. Publicly report on mine-site-level or corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions. 	⊕	<p>Annual reporting on by Anglo (corporate owner) on:</p> <ul style="list-style-type: none"> - Publicly report on corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions - However, no disclosure to IRMA auditors on accounting of greenhouse gas emissions from the Unki mining project, achievement of and/or progress towards mine-site-level greenhouse gas reduction targets, and efforts taken to reduce emissions from the mining project and mining-related activities. - No emissions calculations, action plans, and relevant documentation for verification of 4.5.4.2.a was provided.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Basis for rating

4.6.1.1.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies.	✔	The two sampled reports on Biodiversity Monitoring and assessment, "Biodiversity Baseline, Net Positive Impact (NPI) and Biodiversity and Ecosystem Services Review", and "Biodiversity Baseline Assessment Progress Report – Unki Mine", from January 2020, were completed by competent professionals from organizations with wide-ranging activities and experience in this field.
4.6.1.2.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts.	✔	<p>- For 2003 environmental impact assessment (EIA), consultation undertaken by Amzim from 1998 - 2002 (and socio-economic specialists for socio-economic specialist study in 1995),- Minutes from 1998-2002 consultations are available in Volume IV of the EIA (2003)</p> <p>- During the 2016 environmental and social impact assessment (ESIA) process, 3 Community engagement meetings were held, as well as 22 key informant interviews. Minutes of the 3 meetings held during the ESIA have been provided as evidence. Notice was placed in the national <i>The Herald</i> newspaper, providing comment period more than 30 days.</p>
4.6.1.3.	Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request.	✔	<p>- Consultation through 2003 EIA and 2016 ESIA, but limited evidence of consultation.</p> <p>- No published information on biodiversity.</p> <p>- However, Unki has a system in place to make information publicly available upon request.</p>
4.6.2.1.	Critical New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities.	✔	Unki has several reports, including the Smelter EIA and Fauna and Flora International (FFI) Unki Site Report, which carry out baseline assessments of the species in the area and effects on biodiversity and ecosystem services. These provide "preliminary understanding" of "impacts and risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities." For example, the Smelter EIA contains summary of the vegetative species present, and even site photos of vegetation before and after smelter construction. FFI, an independent entity, completed a site walkthrough which helped to identify ecosystem services and habitat types in the region. These reports are sufficient evidence to satisfy this requirement.
4.6.2.2.	Screening shall include identification and documentation of: <ul style="list-style-type: none"> a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas; b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas 	○	This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. has not been scored by SCS due to challenges related to definitions, scope of application, or lack of guidance necessary to promote the consist rating of the requirement regardless of who is auditing the requirement. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.

<p>and the ecological processes and habitats supporting those values;</p> <p>c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and</p> <p>d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services.</p> <p>4.6.3.1. When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:</p> <p>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;</p> <p>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;</p> <p>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and</p> <p>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services.</p>	<p>○</p>	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. has not been scored by SCS due to challenges related to definitions, scope of application, or lack of guidance necessary to promote the consist rating of the requirement regardless of who is auditing the requirement. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki's surveillance audit.</p>
<p>4.6.4.1. Critical Mitigation measures for new mines shall:</p> <p>a. Follow the mitigation hierarchy of:</p> <p>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;</p> <p>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;</p>	<p>—</p>	<p>- Unki is not a new mine.</p>

<ul style="list-style-type: none"> iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and iv. As a last resort, offsetting the residual impacts. <p>b. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process;</p> <p>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.</p>		
<p>4.6.4.2. At existing mines:</p> <ul style="list-style-type: none"> a. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement onsite restoration strategies, and also, through consultation with stakeholders, design and implement additional conservation actions to support the enhancement of important biodiversity values and/or priority ecosystem services on an appropriate geographic scale; and b. If there is the potential for new impacts on important biodiversity values or priority ecosystem services (e.g., as a result of mine expansions, etc.), the operating company shall follow the mitigation hierarchy, prioritizing the avoidance of impacts on important biodiversity values or priority ecosystem services, but where residual impacts remain, shall apply offsets commensurate to the scale of the additional (new) impacts. 	○	<p>This requirement was identified as needing additional guidance to ensure that it can be audited in a consistent manner. has not been scored by SCS due to challenges related to definitions, scope of application, or lack of guidance necessary to promote the consist rating of the requirement regardless of who is auditing the requirement. IRMA will issue more detailed guidance in 2021, and this requirement will be audited at Unki’s surveillance audit.</p>
<p>4.6.4.3. Offsetting, if required, shall be done in a manner that aligns with international best practice.</p>	—	<p>- Currently no known critical habitat and priority Ecosystem Goods and Services (EGS) features present on the site that require/required offsetting, but this is based solely on currently limited data - this assumption may change once comprehensive surveys have been undertaken and Critical Habitat and Priority EGS assessments have been completed.</p>
<p>4.6.4.4. The operating company shall develop and implement a biodiversity management plan or equivalent that:</p> <ul style="list-style-type: none"> a. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services; b. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time; 	☑	<p>Mitigation measures are stipulated in the 2016 ESIA. They are very generic, but this IRMA requirement is also generic, and the material satisfies this requirement.</p> <p>- Scope of work developed and biodiversity specialists appointed.</p>

	c. Provides a budget and financing plan to ensure that funding is available for effective mitigation.		
4.6.4.5.	Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle.	⊗	
4.6.5.1.	An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company: <ul style="list-style-type: none"> a. Demonstrates that the proposed development in such areas is legally permitted; b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project; c. Conducts mining-related activities in a manner consistent with protected d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. 	—	No projects currently proposed that will affect nearby or adjacent protected areas, as the nearest protected area (Driefontein Grassland Ramsar Site) is more than 50km from Unki's Special Mining Lease area.
4.6.5.2.	Critical An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized. <ul style="list-style-type: none"> · International Union for Conservation of Nature (IUCN) protected area management category IV protected areas; · Ramsar sites that are not IUCN protected area management categories I-III; and · Buffer zones of UNESCO biosphere reserves. 	—	No projects currently proposed that will affect nearby or adjacent protected areas, as the nearest protected area (Driefontein Grassland Ramsar Site) is more than 50km from Unki's Special Mining Lease area.
4.6.5.3.	IRMA will not certify new mines that are developed in or that adversely affect the following protected areas: <ul style="list-style-type: none"> · World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; · IUCN protected area management categories I-III; · Core areas of UNESCO biosphere reserves. 	—	Unki is an existing mine.
4.6.5.4.	Critical An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that: <ul style="list-style-type: none"> a. The mine was developed prior to the area's official designation; b. Management plans have been developed and are being implemented 	—	No projects currently proposed that will affect nearby protected areas, nor were any protected areas present before the development of the mine. Nearest protected area is more than 50 km from Unki's Special Mining Lease area.

	<p>to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized; and</p> <p>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan.</p>		
4.6.6.1.	The operating company shall develop and implement a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine lifecycle.	⊗	
4.6.6.2.	Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time.	⊗	
4.6.6.3.	If monitoring reveals that the operating company's protected areas and/or biodiversity and ecosystem services objectives are not being achieved as expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders.	⊗	
4.6.6.4.	The findings of monitoring programs shall be subject to independent review.	⊗	

Chapter 4.7— Cyanide Management

Basis for rating

Chapter not relevant	—	This chapter is not relevant because this is an existing platinum mine and does not use Cyanide at the site.
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Chapter 4.8— Mercury Management

Basis for rating

Chapter not relevant	—	This chapter is not relevant because no thermal process is used that has the potential to release mercury.
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Endnotes

¹ Visit the Mine Measure website: <https://tools.responsiblemining.net/self-assess/>

² All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version (IRMA Certification Body Requirements, v.1.0) is available at: https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

³ IRMA's Standard for Responsible Mining can be found on the IRMA website, under the Resources tab. <https://responsiblemining.net/resources/>

⁴ See IRMA Certification Body Requirements, v.1.0, pp. 18-19, and Annex A. https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

⁵ See IRMA Certification Body Requirements, v.1.0, p 32. https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

⁶ IRMA website: "Complaints and Feedback." <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

⁷ IRMA Issues Resolution System Procedure. Version 1.0. January 2020. https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf

⁸ See "Mines Site Assessments" on the IRMA website: <https://responsiblemining.net/what-we-do/certification/mines-under-assessment/> and the Unki mine site profile on the Responsible Mining Map: <https://map.responsiblemining.net/site/76>