

Unki Mine Audit Packet

February 2024

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Mining Assurance



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Contents

(click to jump)

[Press Release](#)

[Questions & Answers](#)

[IRMA Process Backgrounder](#)

[Audit Report](#)

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

Amandelbult and Mototolo achieve IRMA 50 and IRMA 75, respectively

16 Feb 2024 – Today the Initiative for Responsible Mining (IRMA) released the audits of Anglo American's Amandelbult and Mototolo PGM operations against the IRMA Standard for Responsible Mining. Independent audit firm ERM-CVS assessed Amandelbult at IRMA 50 and Mototolo at IRMA 75 when measuring their performance against the Standard's best practice social and environmental criteria.

IRMA also released the surveillance (interim) audit for Anglo's Unki PGM operation in Zimbabwe, as conducted by audit firm SCS Global. In 2021, Unki achieved IRMA 75 in IRMA's first-ever on-site audit; a surveillance audit is a more limited check-in, so it does not result in further detailed scoring but rather provides updates on performance.

IRMA 50 or 75 means that ERM-CVS verified that the operations at least substantially met all 40 critical requirements of the IRMA Standard, as well as at least 50 or 75% of the Standard's criteria in each of the four principle areas: social responsibility, environmental responsibility, business integrity and planning for positive legacies. The full audit reports are available on the [Amandelbult](#) and [Mototolo](#) audit pages, as well as [Unki's](#) surveillance report, on the [IRMA website](#).

"The information stakeholders need to decide what's going well — and what may require more attention."

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

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

"These mines began audits during the early Covid years. The timeline was delayed by travel challenges, and then the company's decision to use the optional corrective action period to make improvements. The public has long awaited opportunity to review the information included here, and we applaud Anglo American for volunteering these mines for audit against such comprehensive criteria." **Ms. Boulanger went on to say**, "That said, the IRMA Standard is relatively new for companies that volunteer to be audited, and even our accredited auditors are still learning. The same is true for community members and workers who are interviewed as

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part of the process, some of whom may not yet feel comfortable engaging. So, the Amandelbult and Mototolo audits need to be read with this in mind.”

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

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

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

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

Craig Miller, CEO of Anglo American Platinum said, “This significant milestone at Mototolo and Amandelbult mines in our overall adoption of IRMA enables us to promote transparency and best practice in sustainability, while adding value to our global customers by helping them to meet increasing expectations for responsibly mined materials in an efficient and credible way. With Unki mine achieving IRMA 75 in 2021, and now the achievements of Mototolo with IRMA 75 and Amandelbult with IRMA 50, we are continuing to make great progress towards our sustainable mining plan target of having all our mining operations assured against a recognised responsible mining standard by 2025.

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

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

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Learn more at the Feb 27th Webinar Q&A

- REGISTER: <http://tinyurl.com/IRMAwebinar-A-M>
- Tuesday, 27 Feb, 4pm South Africa time (UTC+2)
- Speakers:
IRMA Executive Director Aimee Boulanger,
IRMA Africa Regional Lead Davidzo Muchawaya
IRMA Assurance Director Michelle Smith,
Anglo American Platinum Head of Sustainability Stephen Bullock
- A discussion and Q&A about the meaning of the audit results, and how the increased transparency an IRMA audit provides can be used by stakeholders to improve the operation.
- All registrants will receive a recording.

For More Information:

- Alan Septoff, +1.301.202.1445, aseptoff@responsiblemining.net
- Amandelbult audit packet: <https://responsiblemining.net/amandelbult-packet>
- Mototolo audit packet: <https://responsiblemining.net/mototolo-packet>
- Unki audit packet: <https://responsiblemining.net/unki-packet>
- Amandelbult IRMA audit page: <https://responsiblemining.net/amandelbult>
- Mototolo IRMA audit page: <https://responsiblemining.net/mototolo>
- Unki IRMA audit page: <https://responsiblemining.net/unki>

February 2024

Questions & Answers

IRMA audits of Anglo American's Amandelbult, Mototolo, Unki PGM mines

Do IRMA audits certify these mining operations as “responsible”?

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

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

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

What does IRMA Transparency mean? What do IRMA 50 and IRMA 75 mean?

IRMA Transparency means a mine has been independently audited against all relevant requirements in IRMA's Standard and has publicly shared its audit scores and the basis for auditors' findings. By sharing such extensive information, a mine provides diverse stakeholders with the information needed to understand the mine's operations and encourage improvement as needed.

IRMA 50 and IRMA 75 mean a mine has been independently audited and met 50% or 75% of the

requirements within each of the four principle areas of the IRMA Standard—business integrity, positive legacies, and social and environmental responsibility. [A mine receiving IRMA 50 or IRMA 75 must meet all of IRMA's critical requirements.](#)

What are the next steps for Anglo American and for IRMA? What is the difference between Unki's surveillance audit and the other audits?

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

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

Unki was fully audited in 2021 and achieved IRMA 75. This surveillance audit is an interim measure that serves to ensure that achievement level is still warranted – halfway between the one full audit and the next. Under normal circumstances the Unki surveillance audit would have occurred 1.5 years ago. Due to covid and other factors, IRMA has extended Unki's audit cycle.

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

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

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

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

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

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

If you have questions about the process that auditors followed or the evidence they reviewed for Amandelbult or Mototolo, contact the audit firm ERM CVS at post@ermcvs.com, for Unki's surveillance audit contact SCS Global at feedback@scsglobalservices.com.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

commitment to all stakeholders and Indigenous rights holders.

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

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

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

How can governments/regulators use this report?

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

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

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

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

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

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

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

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

For more information

IRMA Amandelbult audit page:
<https://responsiblemining.net/amandelbult>

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

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

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JUNE 2023

Background

IRMA's assessment process

The IRMA independent mine assessment process

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

How the IRMA mine audit process works

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

Steps in the IRMA assessment process

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

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

IRMA recognizes four levels of achievement

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

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

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

Providing feedback to the mining company or IRMA

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

For more information

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

IRMA SURVEILLANCE ASSESSMENT PUBLIC SUMMARY REPORT

MINE SITE

Unki Platinum Mine

OPERATING COMPANY

Anglo American Platinum

COUNTRY OF OPERATION

Zimbabwe

FEBRUARY 2024

IRMA STANDARD FOR RESPONSIBLE MINING, v.1.0

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.

Stakeholders participating in IRMA audits 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 audit participants including mine site workers and contractors, community members, traditional chiefs, representatives of governmental and non-governmental agencies, and other interested parties for their contribution to this audit.

Table of Contents

Acknowledgements.....	2
Table of Contents.....	3
Audit Details.....	4
1. Mine Site Overview.....	5
1.1. Overview of Location.....	5
1.2. Overview of Operation.....	9
1.2.2. Activities or facilities excluded from the surveillance audit scope.....	10
2. Mine Site Assessment Process.....	11
2.1. Overview of IRMA Process.....	11
2.1.1. Scope and Limitation of Audits.....	12
2.1.2. IRMA Complaints Process.....	13
2.1.3. Audit Periodicity and Achievement Level Tenure – Unki’s Unique Case.....	13
2.2. Surveillance Audit Process.....	13
2.3. Stakeholder Engagement.....	13
2.4. Summary of Mine Facilities Visited.....	16
3. Summary of Findings.....	17
3.1. Surveillance Audit Outcome.....	17
3.1.1. Progress on Previous Corrective Actions.....	17
3.1.2. Performance Improvements.....	17
3.2. Scores by IRMA Standard Principle and Chapter.....	17
3.3. Performance on Critical Requirements.....	18
3.3.1. Snapshot of performance on 40 critical requirements.....	18
4. Next Steps.....	19
4.1. Corrective Action Plans.....	19
4.2. Timing of Future Audits.....	19
APPENDIX A.....	20
Principle 1: Business Integrity.....	20
Principle 2: Planning for Positive Legacies.....	40
Principle 3: Social Responsibility.....	69
Principle 4: Environmental Responsibility.....	94

Audit Details

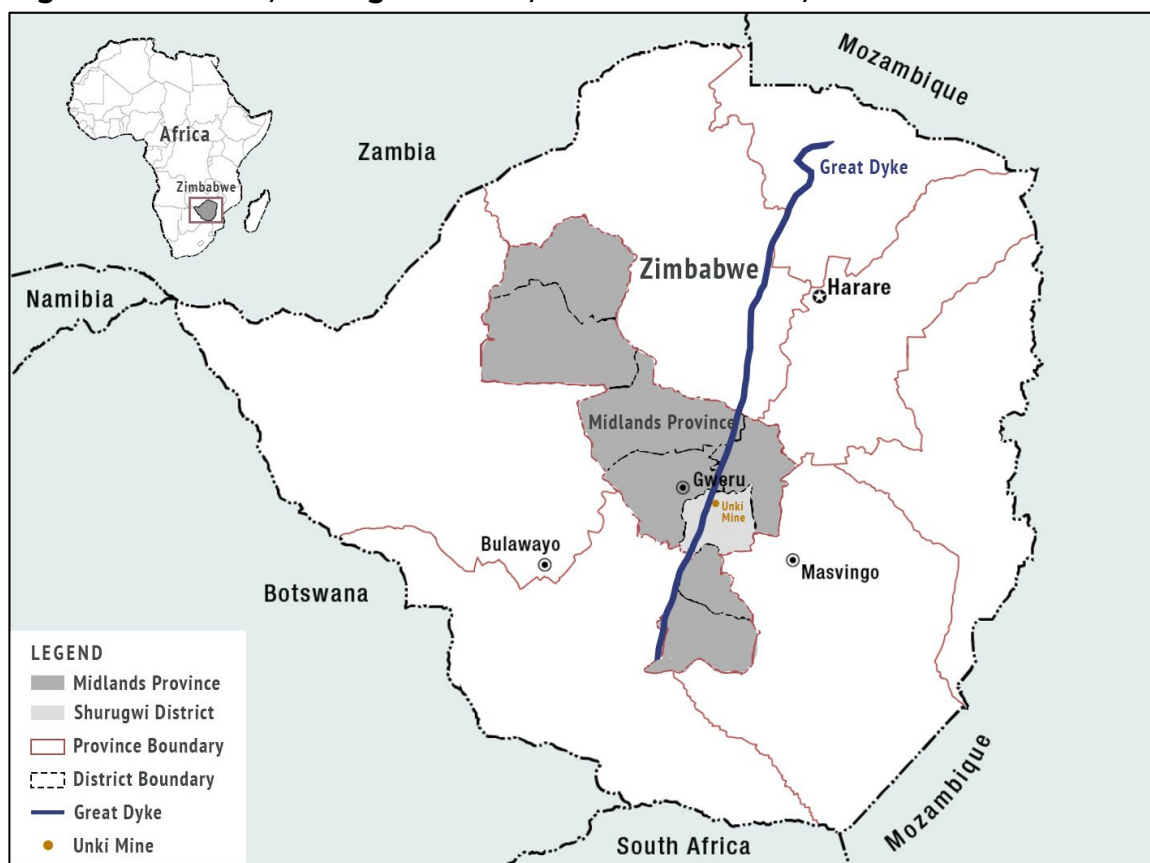
Name of Mine:	Unki Mines (Private) Limited (Unki), Zimbabwe
Operating company:	Unki Mines (Private) Limited (Unki), Zimbabwe
Mine Owner:	Anglo American Platinum Limited, a subsidiary of Anglo American plc
Country of Operation:	Zimbabwe
Mined Material(s):	Platinum, Palladium, Gold, Ruthenium, and Iridium (PGMs)
# Employees / contractors:	1,256 / 1,250 at the time of audit
IRMA Audit Web Page	https://responsiblemining.net/unki
Audit Type:	Surveillance Audit
Audit Dates:	Stage 1 audit: May 2, 2022, to August 1, 2022 Stage 2 audit: August 3, 2022, to August 5, 2022 Chapter 2.6. audit review: February, 2023
Audit Team:	Felipe Ramirez (Lead and Environmental Auditor), Guillermo Cruz (Health & Safety Auditor), Mauricio Inostroza and Susan Courter (Social Auditors); technical experts Adrian Juarez, Marvin Rosales, Abigail Perez and translators Admire Mafurauswa and Dorothy Gengezha
Audit Witness:	Michelle Smith, IRMA Secretariat
Lead Auditor Declaration:	<input type="checkbox"/> The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) considered within the scope of the Surveillance audit activities. <input type="checkbox"/> The audit team members were deemed to have no conflicts of interest with the mine. <input type="checkbox"/> The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities. <input type="checkbox"/> The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.
Scope of Certification	Underground Platinum Group Metals (PGM) mine, concentrator, smelter, tailings storage facility and associated infrastructure
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018), Chapter 2.1 Guidance, (May 2021) and Chapter 2.6 Guidance (November-December 2022 and February 2023)
Certification Body (CB):	SCS Global Services
CB Technical Reviewer:	Susan Courter, Simone Gaab
Achievement Decision:	18 FEBRUARY 2021
Surveillance Report:	16 FEBRUARY 2024
IRMA Reference Number:	IRMA-STD-SCS-002-V-09876

1. Mine Site Overview

1.1. Overview of Location

Anglo American's Unki mine is located in the Republic of Zimbabwe in a mineral-rich region known as the Great Dyke, a mafic intrusion of igneous rock containing economically important metals such as chromium, copper, gold, nickel, and platinum (Figure 1). The Unki underground platinum group metals (PGM) mine situated in the north half of Shurugwi District is one of several mines in the Midlands Province. Minerals such as gold and chromium have been mined and traded in the region for more than 120 years.

Figure 1 Unki Mine, Shurugwi District, Midlands Province, Zimbabwe

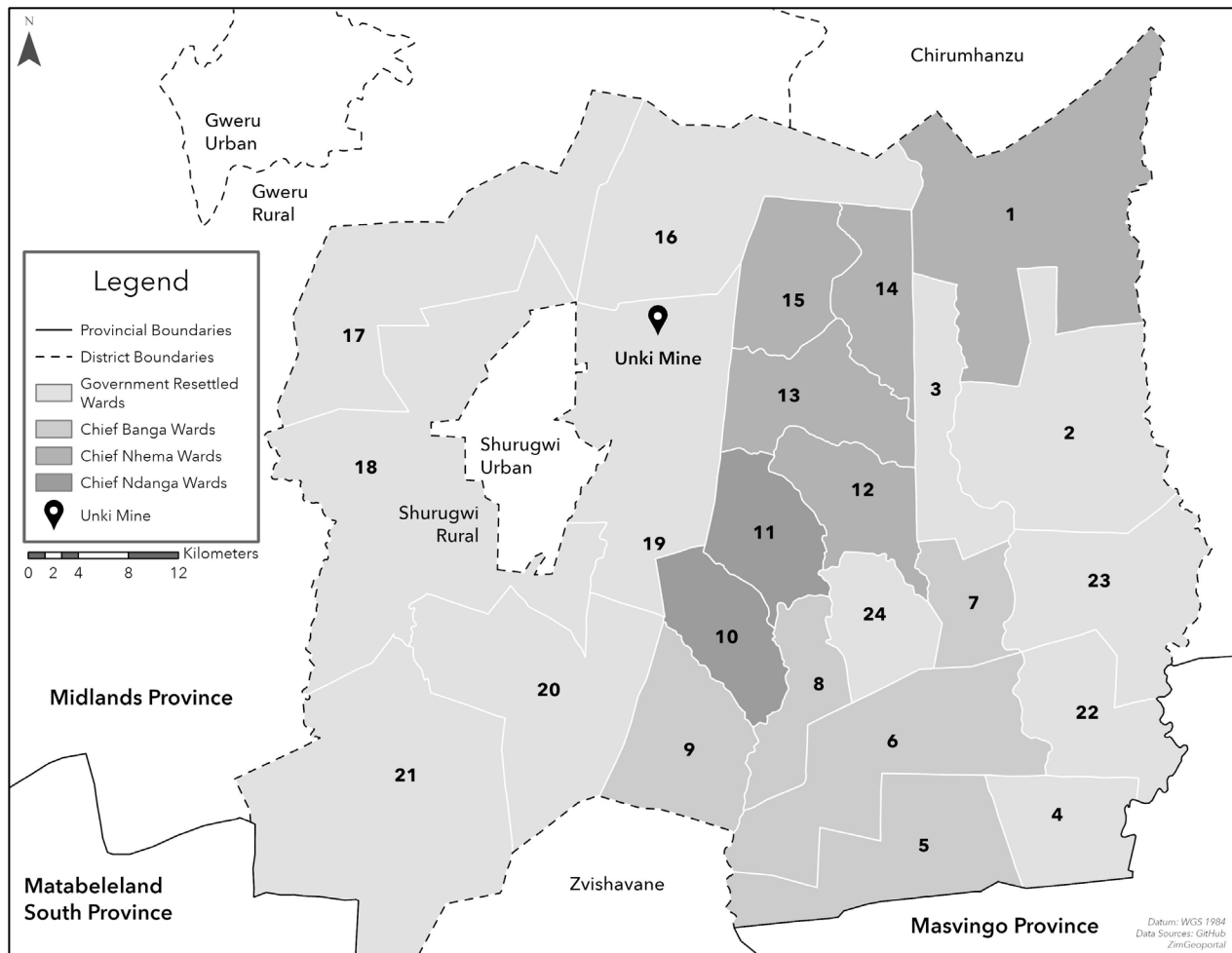


There are approximately 121,619 people who reside in the Shurugwi District (2022 Census). The majority of these people (>80%) live in rural wards and cooperatives shaped by colonial-period policies, patriarchy, and government land reallocation initiatives. Nearly 20% of district residents live in the small town of Shurugwi located west, southwest of the Unki Mine.¹ Land and mineral rights in Shurugwi District are held by the Zimbabwean Government which also recognize the

¹Endnote: based upon Zimbabwe, Shurugwi District 2022 Census: Rural Shurugwi population 98,315; Urban Shurugwi population 23,304.

role of customary tenure systems, i.e., chiefs who oversee the land under their custodianship. State-owned communal areas in tribal trusts in the vicinity of the mine include those led by Chief Banga (Wards 5,6,7,8 and 9), Chief Nhema (Wards 1, 12, 13, 14 and 1), and Chief Ndanga (Wards 10 and 11) (Figure 2). Settlements in the area of the mine including Pasimupindu (Ward 16), Makwikwi, Ghusaruzhinji, Dzikamidzi, Villages 4, 5, 6 and 17 (Ward 19), Adare Farm, Impali (Ward 18) and Rietfontein (Ward 21) are among those whose members were relocated by the government between 1999 to 2006 to increase foreign investment to the region and make way for the Unki Mine.

Figure 2 Shurugwi District, Midlands Province Government Wards, and Administrative Boundaries



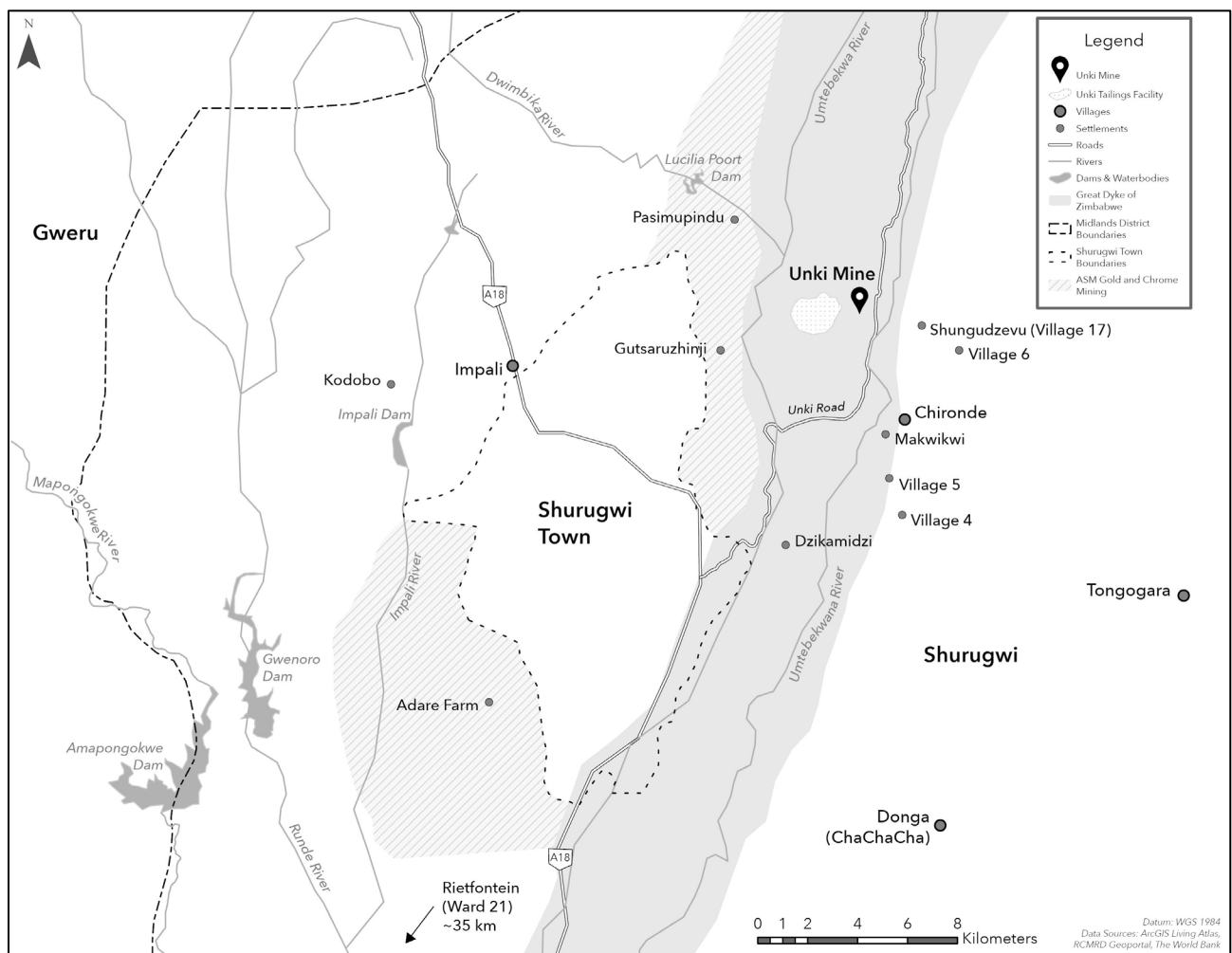
The Unki mine’s underground workings and surface infrastructure occupy the Chironde Range, a bouldered upland savannah woodland (est. elevation 1,400 masl) surrounded by flat, expansive grasslands (est. 1,100 – 1,200 masl).

Two rivers border the mine concession including the Umtebekwa (Mutebekwe) River to the west, and the Umtebekwana (Mutebekwana) River to the east, and feed into the Runde drainage system (Figure 3).

Surface water and plant resources support diverse animal life, including insects, amphibians, fish, reptiles, birds, and mammals such as kudus and bushbucks.

Rural water users and livestock in the district obtain water from several sources, including groundwater (boreholes), seasonal rainwater collection, dams, and surface water (i.e., wetlands, rivers, tributaries, and springs). Urban users (i.e., Chironde, Shurugwi Town, Tongogara, ChaChaCha, Impali, and Gweru) utilize municipal water sources derived from boreholes and dams (i.e., the Gwenoro Dam on the Runde River). Water for the Unki mine operation is primarily sourced through the Lucilia Poort Dam on the Dwimbika River and may be augmented from dewatering the underground mine, water recycling, and from groundwater (boreholes).

Figure 3 Unki Mine Physical Setting



The area experiences moderate temperatures (8° to 28° C) year-round and two distinct seasons: summer (wet) and winter (dry). During the wet season, November to March, rainfall (est. 650-800 mm) replenishes water bodies. Dry seasons can see as little as 50-100 mm of rain. Variability in rainfall and sporadic extreme weather events (i.e., prolonged drought, cyclones/flooding) can have a significant effect on infrastructure and climate-sensitive resources in the area.

Land use around the mine is dominated by pastoral and arable fields connected by communal settlements. Domestic structures in rural areas feature traditional style architecture and construction—circular brick or clay structures with thatched roofs. Fuelwood is the main source of household energy. The primary means of living is subsistence agriculture and animal husbandry (cattle, goat, chicken).

Crops are mainly rain-fed and include drought-resistant maize, tomatoes, potatoes, peas, cabbage, grains, legumes, sorghum, and ground nuts. In bountiful years, vegetables, meat, and milk are sold for cash. Years of low yield (i.e., resulting from low precipitation, lack of seeds, fertilizer, cultivation tools, or the loss of an animal) make it difficult for households to meet minimum food requirements.

Gold panning is also practiced, especially during the dry season when fields lie idle due to the absence of irrigation. Artisanal and small-scale mining (ASM) for gold and chrome occurs predominantly in the greenstone belt located west of the Unki mine concession.

The small town of Shurugwi is the district's administrative center with basic services such as clinics, schools, stores, fuel, internet, and transportation. Public services are also available in the villages of Impali, Chironde, Chachacha, and Tongogara. Local infrastructure development and maintenance (i.e., water, electricity, roads) and services (i.e., clinics, schools) in the district are led by the Shurugwi Town Council and the Tongogara Rural District Council (TRDC) in cooperation with the Zimbabwean government (i.e., ZIMWA, DDF). Regional services such as hospitals and airline travel are accessed from neighboring provinces in the cities of Gweru and Bulawayo.

English is the principal language, with Ndebele and Shona used by people in all regions of the country. African culture is shared in oral tradition, artifacts, paintings, and ways of living.

The Unki mine is the largest employer in Shurugwi District and draws most of its unskilled workforce and that of its business partners from local communities. Hiring includes recruitment of women, a practice disrupting traditional gender norms of some areas.²

The socio-economic benefits of the mine are apportioned through the Tongogara Community Share Ownership Trust (TCSOT), a program initiated by the government to address rural poverty in the region. Since 2003, Unki has invested more than \$22 million (USD) in community development.

While the TCSOT has created a path for the development of clinics, schools, boreholes, and other infrastructure in the area, low social and economic indicators continue to amplify income disparity, especially for vulnerable groups (women, children, elderly or disabled) that reside in rural areas of subsistence agriculture.³

² Zimbabwe Country Gender Assessment Report, Food and Agriculture Organization of the United Nations, 2017. <https://www.fao.org/publications/card/en/c/83109525-89ed-405a-8fe8-00a80997d341/>

³ World Bank Report 176544, Reversing the Tide: Reducing Poverty and Boosting Resilience in Zimbabwe, October 1, 2022. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099925010032212957/p1767360cd8f1f00c0b0c803c995a669a6c>

1.2. Overview of Operation

Global demand for platinum is largely driven by its use in the automotive industry for catalytic converters and fuel cell technology for energy storage. Unki is one of several industrial-scale platinum mines currently operating within the Great Dyke.

Operations at the Unki mine, wholly owned by Anglo American Platinum, was initiated in 2003 with the development of surface infrastructure beginning with the Lucilia Poort Dam and main access road.

Development of the underground portal and decline shaft followed on the eastern side of the Chironde Range in 2008 with ore being stockpiled on the surface. The concentrator was commissioned in 2010 and reached its nameplate milling capacity of 120 thousand tons per month (ktpm) in 2011.

Since then, production has expanded to circa 210 ktpm. A smelter was added to the process in 2018 to produce concentrate and matte which are shipped to Anglo American Platinum's refineries in Rustenburg, South Africa, for further processing. At current production levels the mine has a life up to 2060.

Underground operations involve drilling and blasting in bord and pillar style mining (also known as room and pillar mining). The roof is supported by bolts which are installed by a mechanical bolter. The broken ore is screened and transported to the surface by a system of conveyors, where it is milled and processed using the flotation method to produce ore concentrate. The concentrate is treated at a smelter to produce matte. Process water and tailings, which is the fine material left after the platinum and other metals have been removed from the crushed ore, are discharged into the tailings storage facility (TSF), see Figure 4.

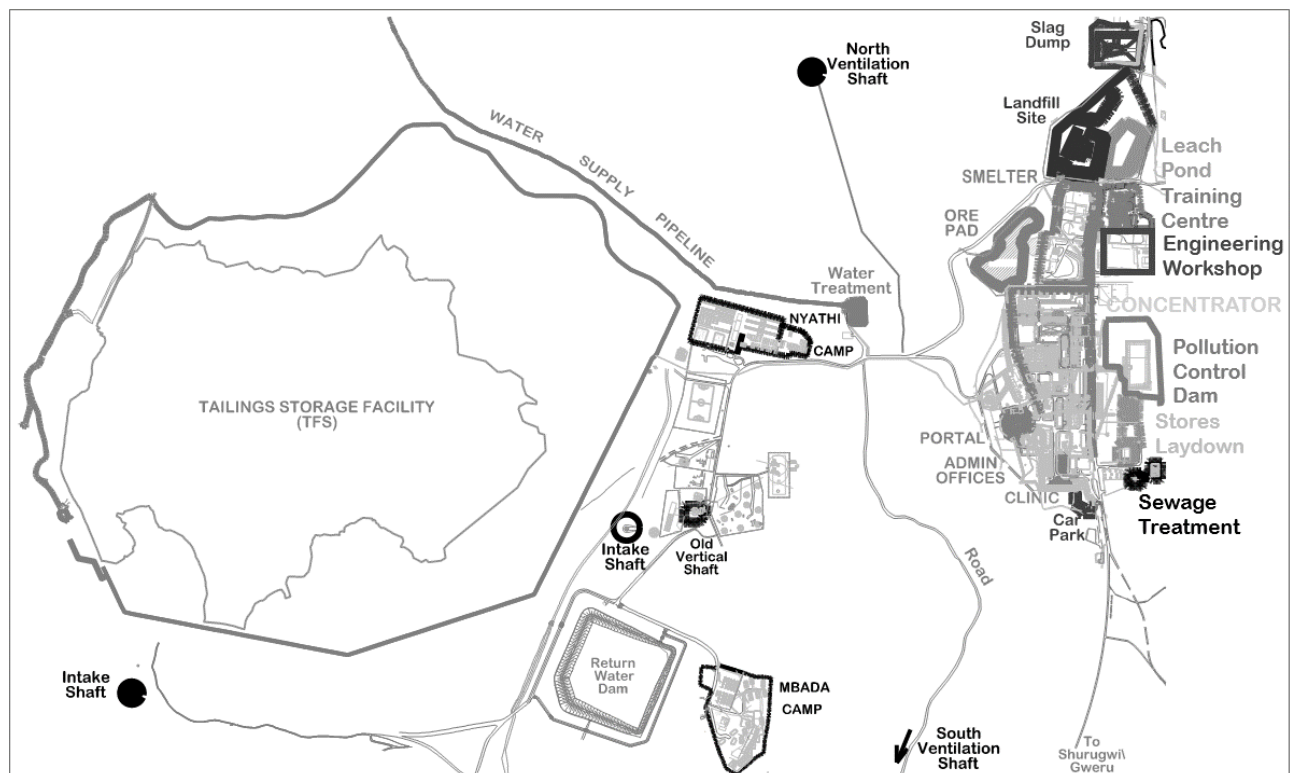


Figure 4 Generalized View, Unki Mine Operation

1.2.1. Scope of Activities and Facilities Included in Audit

An IRMA surveillance audit is a subset of a full IRMA audit, and typically encompasses all previously audited areas, activities and facilities. For the Unki mine this includes the underground platinum group metals (PGM) mine, concentrator, smelter, tailings storage facility, associated infrastructure, and area surrounding the Unki mine.

The surveillance audit scope is based upon the findings of the Unki mine initial audit (2019) presented in the Site Assessment Public Summary Report (February 18, 2021), including auditor notes and the Unki mine corrective action plan as well as IRMA Standard Guidance (October 2019), IRMA Certification Body Requirements (November 2019), IRMA Auditor Manual (May 2020), IRMA Draft Auditor Guidance (May 2021), and reference sources (ISO 17021).

The audit scope includes fifty-four (54) requirements not previously scored during the initial IRMA audit, as interpretive guidance was forthcoming including the IRMA Standard v.1 (2018) Guidance (i.e., Chapter 2.1 ESIA Guidance, October 2020; IRMA Auditor Manual, May 2020, and Chapter 2.6 Financial Surety Guidance (October-December 2022, and May 2023).

Other scope considerations for the Unki mine IRMA surveillance audit included:

- Critical requirements (all)
- Chapter 1.1 (all requirements)
- Site-level risks identified by the audit team and IRMA
- Consideration of written stakeholder input received since the initial audit
- Verification of relevancy for chapters previously determined to be not relevant
- Consideration of material changes in the operations, management system, or management structure to the extent that such changes impact the site's performance against the IRMA Standard

1.2.2. Activities or facilities excluded from the surveillance audit scope

There are no activities or operations specifically excluded in the surveillance audit scope.

2. Mine Site Assessment Process

2.1. Overview of IRMA Process

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

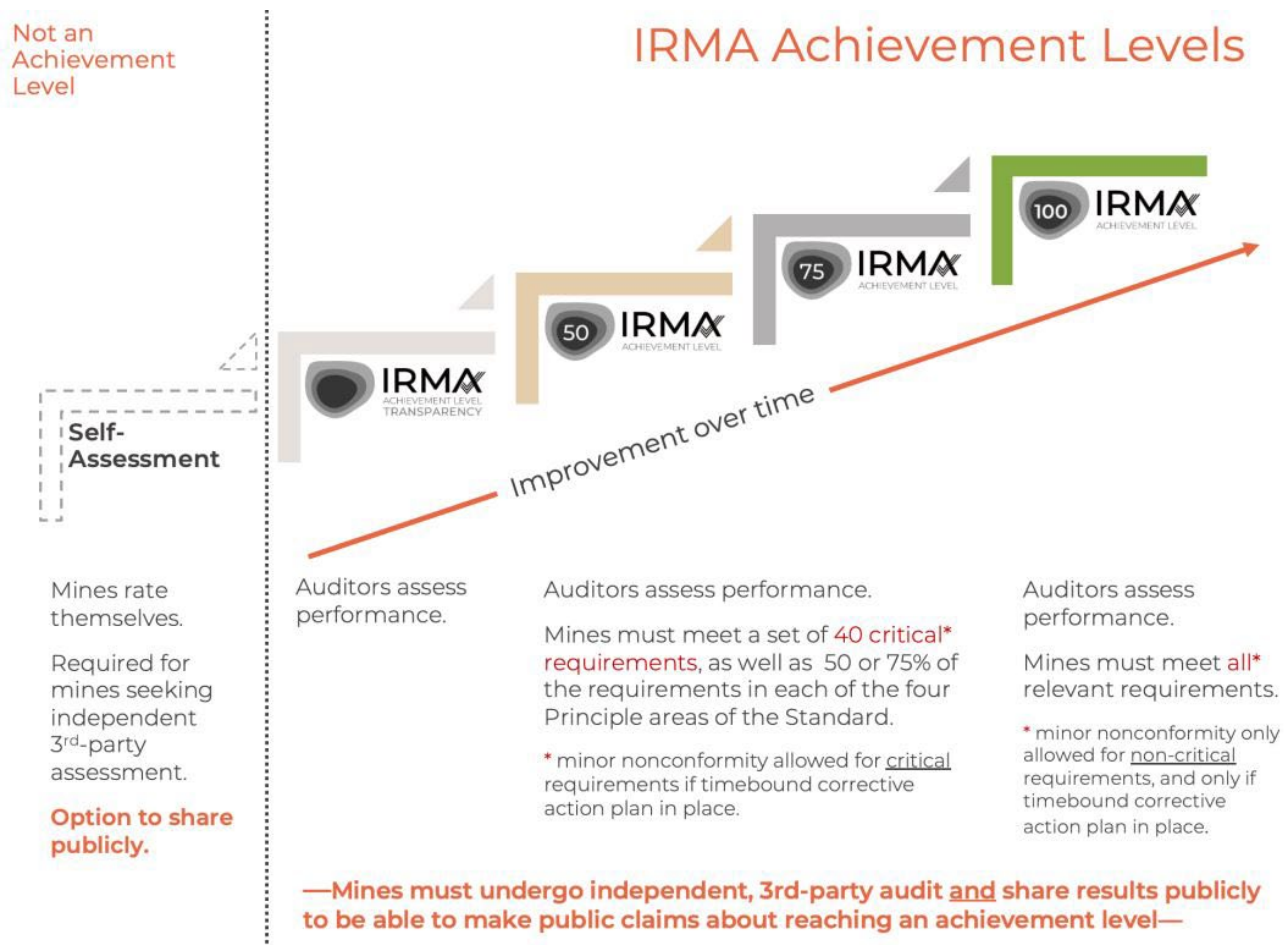
Audits are carried out in general conformance with established industry practice (i.e., ISO 19011). In addition to document review, audits include on-site observation of operations and the surrounding environment, review of documents and records, and interviews with site personnel and relevant stakeholders.

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

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

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.⁴



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 (June 2018) by external auditors. Audits are conducted by auditors who: have undergone IRMA training, meet IRMA competency requirements and have been deemed to have no conflicts-of-interest with the mine site under assessment.

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011). In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders. Auditor evaluations are based on the collected audit evidence assessed against the requirements of the IRMA Standard for Responsible Mining.

⁴ All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version of the Assessment Manual for Mines is available at: [Resources - IRMA - The Initiative for Responsible Mining Assurance](#)

Professional judgments expressed in auditor comments are based on the facts available at the time of the audit within the limits of the existing data, scope of work, budget, and schedule.

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

2.1.2. IRMA Complaints Process

IRMA stakeholders who wish to file a complaint related to the mine site assessment process may submit feedback on the IRMA website.⁵ Details on the complaints process can be found in IRMA's Issues Resolution Procedure.⁶

2.1.3. Audit Periodicity and Achievement Level Tenure – Unki's Unique Case ⁷

Under normal circumstances, an IRMA achievement expires three years from the date of the release of Initial Audit by which time the mine will have undergone a Re-Assessment Audit during which the site's initial IRMA achievement level will be verified. Under those circumstances, Unki's original achievement level of IRMA 75 would have expired in February 2024. Due to unique circumstances – the COVID pandemic, Unki being the first mine independently audited as the IRMA Standard, and other factors – IRMA is extending the term of the Unki mine's achievement level.

2.2. Surveillance Audit Process

The surveillance audit process included a Stage 1 desktop audit and a Stage 2 on-site audit by the Certification Body. The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if any, governmental agencies, as well as documentation review, and visits to operational areas, surrounding areas, and other locations including surrounding communities.

2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Audits are announced by IRMA and Certification Bodies, and prior to the on-site audit there is additional outreach carried out by Certification Bodies. Onsite observations and interviews were conducted between August 3 and August 6, 2022. Additionally, some interviews were held online (before and immediately after the site visit.)

⁵ IRMA website: "Complaints and Feedback." <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

⁶ IRMA Issues Resolution System Procedure. Version 1.0. January 2020. https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf

⁷ The IRMA Secretariat added section 2.1.3.

2.3.1. Written Comments/inquiries

Stakeholders were notified at least thirty (30) days prior to the audit date. Notifications were made via *The Sun*, via employee newsletters, and via posters placed in community centers within the nearby towns. Stakeholders had several means to provide comments including in person (by appointment), online at <https://info.scsglobal.com/irmafeedback>, and via WhatsApp. Five (5) written inquiries were received prior to the on-site surveillance audit, and the comments were included as part of the stakeholder engagement process interviews.

2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. Some management team interviews were conducted remotely (via Microsoft Teams). The positions listed were those held at the time of the audit.

Table 1. Mine Staff Interviews

Position/Role
General Manager
Integrated Planning and Operating Model Manager
Human Resources Manager
Safety, Health, and Environment Manager
Social Performance Manager
Mine Manager
Protection Services Manager
Stakeholder Engagement and Communication Officer
Environmental Coordinator
Environmental Assistant
Tailings Storage Facility Manager
Technical Manager
Civil and Water Engineer
Finance Manager
Geology Manager
Employee Relations and Welfare Manager

2.3.3. Workers/Contractors

Onsite interviews with both permanent Unki employees and contractors were conducted between August 3 and August 6, 2022. Additionally, some interviews were held online (before the site visit), and informally as part of the site tour. Interviewees included a cross-section of roles, gender, and ages representing key areas of the operation.

56 workers and contractors from the following areas were interviewed onsite: underground mining, surface support areas (i.e., safety and health, emergency preparedness and response, environmental and social management), maintenance workshops (vehicle/equipment), processing plant, water treatment facility, slag and waste stockpiles, smelter, tailings storage

facility, waste sorting, disposal and incineration areas, biodigester, worker housing and cafeterias clinic, monitoring locations (i.e., surface water), and operation control rooms.

8 contractor employees were interviewed including: Sandvik, Tsebo, Gateway, Bulwark, Safeguard, Peace Security, JRG, and Dombojena Waste Management.

2.3.4. Government Agencies

Interviews were conducted with the following public sector institutions between August 3 and August 5, 2022.

Table 2. Government Agency Interviews

Institution
Cultural Extension Officer for Village 17 – Shurugwi
Member of Parliament - Tongorara
District Development Coordinator - Shurugwi
District Hospital Administrator - Shurugwi
District Forestry Officer. Forestry Commission – Mudzinganyama, Chironde

2.3.5. Participating Communities and NGOs

In-person and virtual (Microsoft Teams, Zoom, and WhatsApp) interviews were conducted with approximately 26 external stakeholders between August 3 and August 29, 2022. The interviews included a cross-section of community members including men, women, youth, and vulnerable groups where feasible.

Table 3. Interviews with the Representatives of Local Communities and NGOs

Community, NGO Name	Meeting Location	Number of Attendees
Village 17, Ward 19	Village 17 field	3 males, 1 female
Gutsaruzhinji, Ward 19	Shurugwi	1 male
Dzikamidzi, Ward 19	Shurugwi	2 males
Pasimupindu, Ward 16	Shurugwi	1 male
Adare farm, Ward 18	Shurugwi	1 male
Shurugwi, Ward 18	Shurugwi	4 (2 females, 2 males)
Representative of Tongogara, Ward 16	Shurugwi	1 male
Gweru	Gweru	3 (2 females, 1 male)
Chironde, Ward 19	Chironde	8 (1 females, 7 males)
Local Initiatives & Development (LID) Agency	Shurugwi	1 male
Msipa Trust Fund	online	1 female
ZELA	online	3 females

2.4. Summary of Mine Facilities Visited

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

Table 4. Areas visited during the on-site audit

Operational areas	Underground mine and surface support areas, processing plant, concentrator, maintenance workshops, water treatment facility, smelter, tailings storage facility, waste sorting and disposal facility, incinerator, biodigester, slag, soil and waste stockpiles, product load-out, clinic and emergency services, worker housing and cafeterias, operation and monitoring control rooms, and management areas.
Non-operational areas visited	Emergency preparedness and response infrastructure (sirens), areas of subsurface exploration and contractor staging.
Surrounding communities	Meetings were organized to include a sample of stakeholders from different communities in Shurugwi District: Gweru, Chironde, and Impali. Shurugwi town, Shurugwi District Wards, Chachacha, Tongogara, government resettlement communities (Village 17 in Ward 19), and areas represented by traditional chiefs. Additionally, the auditing team toured the surrounding area to have a good understanding of local contexts including topography and land use, water resources and distribution, ecological services, and local mining interests (i.e., industrial and artisanal and small-scale mining (ASM) for chromite and gold).

3. Summary of Findings

Unki's initial audit, the very first IRMA audit, excluded criteria awaiting guidance at the time of IRMA's launch. These previously unassessed, yet relevant criteria are included in this surveillance review. Individual findings are presented in Appendix A. During the initial audit (4) IRMA Chapters: Free, Prior and Informed Consent (Chapter 2.2), Conflict-Affected and High-Risk Areas (Chapter 3.4), Cyanide Management (Chapter 4.7), and Mercury Management (Chapter 4.8) were determined "not relevant" as per the criteria outlined in the IRMA Standard (Version 1, 2018) and are therefore excluded from the surveillance audit. Applicability of these chapters will be reviewed again at the time of the next full (re-assessment) audit.

3.1. Surveillance Audit Outcome

Business Integrity (Principle 1) and Social Responsibility (Principle 3) are among the areas the site continues to perform best. Environmental Responsibility (Principle 4) saw the most improvement since the time of the initial audit. Chapter 4.6, Biodiversity, Ecological Services and Protected Areas, has the greatest opportunity for improvement. All critical requirements met IRMA criteria with a score of substantially or fully meets. Note that not all requirements were assessed at the time of the initial audit, as explained above.

3.1.1. Progress on Previous Corrective Actions

Actions taken to improve environmental and social management systems and performance will be audited at the next full (re-assessment) audit.

3.1.2. Performance Improvements

Activities undertaken or in progress at the time of the surveillance audit include, but are not limited to water use and water balance research to inform conservation efforts, the design and construction of a tailings storage facility (TSF) expansion to collect water related to extreme rain events, feasibility studies for recycling TSF water for reuse in processing, slag suitability analysis (for use in construction aggregates such as bricks, concrete or asphalt), the installation of a biodigester to reduce solid waste, the implementation of an updated stakeholder engagement plan, and community-wide support for the prevention and response to COVID-19. In addition, Unki's partnership with the NGO TechnoServe continues to advance local small-holder agriculture and animal husbandry in areas around the mine.

3.2. Scores by IRMA Standard Principle and Chapter

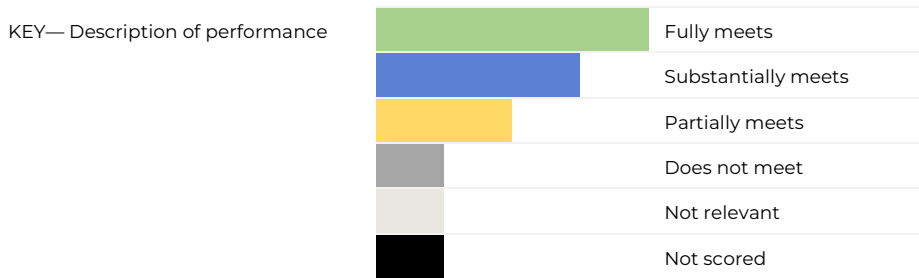
Because a surveillance audit is limited in scope, not every requirement in every chapter is assessed. The details of the assessment outcome for requirements that were included in the surveillance assessment are provided in Appendix A.

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) 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.

All critical requirements were evaluated during the surveillance audit. A snapshot of achievement against the critical requirements, as determined by the Certification Body during this surveillance audit, is provided below. Auditor findings for each requirement are provided in Appendix A.

3.3.1. Snapshot of performance on 40 critical requirements



4. Next Steps

4.1. Corrective Action Plans

A comprehensive review of the progress made on implementing corrective actions following the initial assessment and surveillance assessment, will be conducted during the next full audit.

4.2. Timing of Future Audits







In the IRMA system, a surveillance audit is a mid-point between full audits. The Stage 1 desktop audit and Stage 2 on-site audit of this surveillance audit were conducted midway between the initial and planned reassessment audit. The preparation of additional guidance on Chapter 2.6 extended the timeline of the audit, resulting in a delay of publication. As referenced in Section 2.1.3, IRMA is extending Unki's achievement decision tenure due to COVID and other factors. Planning for the upcoming full Reassessment Audit is imminent..

APPENDIX A

This appendix provides details of the assessment of requirements that were considered during the surveillance audit. The IRMA standard includes a total of 428 requirements. For this surveillance audit, 211 requirements were reassessed and scored. This number includes 54 requirements not previously scored in the initial IRMA assessment as described in Section 2.1.1. Details on the number of requirements assessed for each chapter are provided at the beginning of each chapter.

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	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 8 requirements – total number of IRMA Chapter 1.1 Legal Compliance criteria - 8 requirements – total number Unki surveillance audit criteria; all previously assessed 		
1.1.1.1.	<p>Critical The operating company shall comply with all applicable host country laws in relation to the mining project.</p>	<p>The evidence, including the site's Permitting Legal Requirements Register (2022) that lists legal requirements and permit status, the Unki Mine Permits/Licenses Matrix (version 6.0, April 2022), a Technical Support Document for the site's Permitting Plan (2022), an Agreement for Supply of Services (2019), a 2021 Unki MPR Final Feedback Presentation, and an excerpt from the Mine Annual Report for 2021 (page 21), indicates that the company is in compliance with applicable country laws, and has several systems and software to track the status of permits and licenses.</p> <p>The evidence does not include a centralized tool for tracking the status of all compliance obligations.</p>
1.1.2.1.	<p>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>Not relevant. No conflicts were identified between host country law and IRMA requirements.</p>
1.1.3.1.	<p>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>The evidence, Isometrix, a third-party permits management and tracking system, one example of a completed corrective action related to blasting (a letter to the Provincial Mining Director), and interviews with company management provides evidence of timely and effective action taken to remedy a non-compliance, as well as prevent future non-compliances from happening.</p> <p>The evidence example does not include the remedy for a noncompliance event associated with an uncontrolled release of sediment-laden water from the PCD to the Umtebekwana River (2019), and a sample of stakeholders interviewed report remedies of non-compliance are not always timely and effective. In the case of the Umtebekwana River release, the remedy, which was to expand holding capacity for water treatment to prevent an accidental release, was observed by auditors in place during the onsite audit.</p>

Chapter 1.1—Legal Compliance		2022	Basis for rating
1.1.4.1.	The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project.	✓	The evidence, Responsible Sourcing Standard (2020), related Responsible Sourcing contractor training records (March 2022), and Agreement for Supply of Services (Appendix A, November 2019), a sample contract between the company and a contractor, indicates the company has contractor expectations related to environmental and social performance consistent with IRMA requirements. Several other pieces of evidence were submitted to demonstrate contractor compliance oversight including monthly self-monitoring reports (social management), a due diligence checklist (2021), and report sample for the security provider of the Impali housing project (Contractors Competency Verification, November 2021). In addition, contractor compliance to permit requirements is tracked in the company's Technical Support Document for the site's Permitting Plan (2022) Additionally, interviews with a sample of contractors, and mine managers and staff at all levels offered their commitment to meeting the spirit of IRMA.
1.1.5.1.	The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard.	✓	The evidence, examples of compliance tracking in Project Spear, Sentinel, and Isometrix software, indicates records of compliance with host country laws are maintained. Interviews with a sample of mine managers and staff provide further evidence of the company's commitment to auditing and maintaining records of compliance to the IRMA Standard through regular, independent, third-party review.
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.	✓	The evidence includes findings from a third-party legal permit gap analysis (Anglo American Platinum Permit Review, August 2019) along with a summary of gap closure actions (Unki Mine Legal Audit Closeout, September 2019). The closeout document includes descriptions of possible non-compliance and the company's responses to how each potential gap was closed in the form of permit status updates, discussions, and remedies.
1.1.5.3.	Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available.	✓	The evidence, written confirmation the company self-reports regulatory non-compliance incidents to relevant authorities, and public disclosures made through the Community Engagement Forum (CEF) as indicated by interviews with CEF members indicate stakeholders are provided summary information on publicly available non-compliance issues. Interviews with company managers report complaints or requests relating to legal compliance are channeled to the Community Relations Department. An investigation is then undertaken, a report compiled, and results shared with requesting stakeholder(s). The regulatory non-compliance incidents are also captured in the Social Incidents and Grievance Register shared with the CEF and internally reported through Enablon.


Chapter 1.1—Legal Compliance		2022	Basis for rating
1.1.5.4.	<p>Where the operating company claims that records or documentation contains confidential business information, it shall:</p> <ol style="list-style-type: none"> Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information. 	—	Not relevant. Records reviewed by auditors did not contain confidential information. Interviews with company managers confirm Chapter 1.1 evidence does not include confidential business information.

Chapter 1.2—Community and Stakeholder Engagement		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 16 requirements – total number of IRMA Chapter 1.2 Community and Stakeholder Engagement criteria - 9 requirements – total number Unki surveillance audit criteria; includes 7 items not previously scored (see Section 1.2.1.1) 			
1.2.1.1.	<p>The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities.</p>	✔	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The following evidence includes information regarding stakeholders in the area around the mine:</p> <ul style="list-style-type: none"> - Stakeholder Engagement Plan (SEP) (2019, 2020, 2021, and 2022), - Site level Social Performance Organigram (2021), - Unki Stakeholder Register (no date), and - Function-Specific Stakeholder Engagement Plans-Presentations to SPMC by internal heads of departments (HOD). <p>The SEPs include a chart with stakeholders grouped by categories and a general diagram showing stakeholders' position regarding their level of interest, influence, and</p>

Chapter 1.2—Community and Stakeholder Engagement		2022	Basis for rating
			impact by the following categories: community social service institutions, NGOs, Trust CBOs, interested groups, banks, media, government departments, ministries, parastatals, regulators, local authorities, communities (including vulnerable subgroups), vulnerable groups (context-specific, may include women, youths, the elderly, etc.), traditional authorities, chiefs, village heads, elected representatives (worker and community reps), site management, employees, unions, professional organizations, contractors, business partners, suppliers, industry peers, and Chamber of Mines. Detailed contact information, and the type of involvement required, among others, are defined in the Unki Stakeholders Registry. Interviews with a sample of stakeholders confirm the company has identified a reasonable range of affected and interested stakeholders.
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 not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Stakeholder Engagement Plan (2019, 2020, 2021, and 2022) indicates that the company has developed a plan that is updated annually or when significant changes occur in the local context. The SEP includes the Community Engagement Forum (CEF), a mechanism to ensure the transfer of information and provide opportunities for stakeholders to express their concerns, as the main interaction strategy. The frequency of CEF has been established for Thursdays on a quarterly basis considering the holiday among the Shona people (the elected day for meetings is the Chisi day) as indicated in Community Engagement Forum (CEF): Terms of Reference (July 2020). The evidence includes CEF meeting attendance registers indicating its implementation (CEF Attendance Register, 2020, 2021 and 2022).
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 not scored in the initial IRMA audit (2019) published in February 2021. The evidence, a sample of CEF meeting minutes for the years 2020, 2021, and 2022, and the Stakeholder Engagement Plan (2022), indicates consultation between the company and its community representatives is ongoing, including efforts to listen, understand and eliminate barriers that limit stakeholder participation, as well as ensure that stakeholders receive information from their representatives and that their feedback is taken into account. While the evidence does not show community participation in the initial design of the Community Engagement Forum (CEF), the stakeholder engagement plan considered the internal local dynamics for scheduling meetings with stakeholders that would allow men and women to attend, as well as the use of English and Shona languages for oral communication to make the program culturally appropriate. The CEF meeting minutes

Chapter 1.2—Community and Stakeholder Engagement	2022	Basis for rating
		<p>indicate that the community representatives contribute to decision-making on meeting frequency (CEF and environment and emergency subcommittees).</p> <p>Interviews with a sample of stakeholders, including women and vulnerable groups in the area around the mine as well as representatives on the CEF indicate engagement processes are working as intended, including accessible, culturally appropriate, and inclusive.</p>
1.2.2.2.	<p>Critical The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ol style="list-style-type: none"> Providing relevant information to stakeholders in a timely manner; Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; Soliciting feedback from stakeholders on issues relevant to them; and Providing stakeholders with feedback on how the company has taken their input into account. 	<p>The evidence, a sample of meeting minutes with communities in the area around the mine (2020 to 2022), indicates that the company fosters two-way dialog and meaningful engagement including (a) relevant information in a timely manner, (b) with subject matter experts, (c) in a manner that is respectful, free from manipulation; that includes (d) soliciting feedback from stakeholders on issues relevant to them, and (e) provides stakeholders with feedback on how their input was taken into account.</p> <p>The meeting minutes indicate that during the last few years, the company has carried out two-way communication processes with its stakeholders or their representatives through the Community Engagement Forum (CEF). These participatory spaces provide stakeholders with relevant and timely information related to the mine's risk and impact mitigation measures, grievance mechanism procedures, cases and responses, and social assistance, among others. Some of these meetings were attended by Unki experts to provide clear and understandable information on specific topics of importance to stakeholders (i.e., Unki's Process Manager explained the controlled discharge of excess water from the tailings dam) providing evidence of (b)</p> <p>Minutes of the meetings and interviews evidence indicate that engagement processes are conducted through respectful dialogue between stakeholders and the mine representatives. The company's values (i.e., safety, responsibility, care and respect, integrity, and others) were mentioned at the beginning of these meetings to provide a safe space for participants. Feedback from stakeholders and the company was recorded in the minutes of the meetings held to ensure action was taken on the input and agreements reached (d) and (e).</p> <p>Documental evidence is supported by interviews with a variety of community stakeholders (chiefs, health administrators, CEF members, agricultural agents, workers, etc.) at the time of the onsite audit.</p>
1.2.2.4.	<p>Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have</p>	<p>The evidence, including the Stakeholder Engagement Plan (SEP 2022), which is the main engagement mechanism, a sample of minutes of the Stakeholder Engagement Forum (CEF, 2020 -2022), and the Community Engagement Forum (CEF) Terms of</p>

Chapter 1.2—Community and Stakeholder Engagement	2022	Basis for rating
		<p>Reference (July 2020), indicates that engagement processes are accessible to stakeholders. The terms of reference of the CEF indicate that it is the committee's aim to ensure that stakeholders (including vulnerable groups) are kept informed and can express their views. This document indicates that the company will also engage directly with (entire) communities. Unlike the quarterly CEF meetings, the frequency of direct meetings depends on the potential exposure to identified risks and impacts associated with operations at the mine (i.e., as needed).</p> <p>Accessibility to the CEF meeting place (the mine) is considered when planning. The company has considered mechanisms to facilitate attendance at meetings (i.e., fuel reimbursement for those using private transportation). Meetings with entire communities at regular village meeting places to allow attendance by all, including vulnerable groups (i.e., women, youth, the elderly, and people with disabilities).</p> <p>Regarding cultural relevance, the SEP mentioned that the local language (Shona) is used orally during participatory processes. Also, posters in the Shona language regarding the grievance mechanism, general emergency preparedness and response procedure, and COVID-19 preventive communication were provided as evidence of the use of the local language.</p> <p>Interviews with sample of stakeholders, including village members, employees and contractors (kitchen, maintenance, security), including elderly, women, men, those who speak for children, and those with disabilities, indicate that processes are accessible, culturally appropriate, and inclusive.</p>
1.2.2.5.		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, including the Community Engagement Forum (CEF) Election Results (October 01, 2020), Community Engagement Perception Survey Report (September 2019), CERP Workshop (February 25, 2021), Emergency Preparedness and Response Drill Report-Fire at Adare Farm (September 2021), CEPRP Adare farm meeting Minutes and Register (September, 30 2021), Village Health Workers Engagement Meeting Minutes and Register (August 2021), Unki Mine Stakeholder Engagement Plan (version 1, 2022), and Q1 2022 CEF Minutes and Register (March 24, 2022), indicates that the main mechanism for formal stakeholder engagement is through elected community representatives at CEF meetings.</p> <p>The CEF is made up of local authorities, the company, and community representatives. Meeting minutes indicate CEF representatives are selected through a participatory process every two years. In addition, the evidence indicates the company reminds participants to inform their constituents of the development and content of the meetings, as well as to produce evidence of such activity. Communications with the</p>

Chapter 1.2—Community and Stakeholder Engagement	2022	Basis for rating
		<p>company by CEF members include (a) Village 6 feedback report by CEF member on Unki health program, and (b) Adare farm feedback report by CEF member on boreholes.</p> <p>Additionally, the company Stakeholder Engagement Plan indicates that, in conjunction to the CEF meetings, additional informational processes are conducted with all community members and vulnerable groups for direct and meaningful participation. Evidence of the implementation of comprehensive communication processes (meeting minutes) in the area around the mine included: Ward 19 community (December 4, 2019), two communities around the mine (May 21, 2021), and Dzikamidzi community (March 3, 2022).</p> <p>Interviews with a sample of company and community stakeholders, including those from Village 17, Gutsaruzhinji, Dzikamidzi, Pasimupindu and Adare farm indicate that elected community representatives adequately represent the views/interests of constituents, and that they are kept aware of developments in the community.</p>
1.2.3.1.		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, a sample of CEF meeting minutes (2020-2022), indicates that some of the affected communities (i.e., Adare Farm) participate in water quality monitoring while there are demands from others (Dzikamidzi Co-operative) to participate in the sampling process. Minutes of meetings indicate that the company encourages participation by having interested communities contact Unki representatives or work with involved government entities. Interviews with company representatives indicate that training on water and air sampling procedures has been provided to members of the community environmental committee (CEC), and that in response to the request from the Dzikamidzi community, their representative was elected to the CEC in 2022 was trained on sampling procedures for meaningful participation.</p> <p>Currently, various community representatives are involved in participatory monitoring in their areas, and this is confirmed by auditors through a sample of stakeholders interviewed at the time of the onsite audit.</p>

Chapter 1.2—Community and Stakeholder Engagement		2022	Basis for rating
1.2.4.3.	Communications shall be carried out and information shall be provided to stakeholders in a timely manner and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders.	✔	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, a sample of CEF meeting minutes (2020-2022), indicates that the company provides communication and information to its stakeholders in a timely manner (such as early warning of stakeholders about potential impacts caused by the mine; in some cases, the WhatsApp group tool is used due to its agility). Regarding the language used, the company includes the development and dissemination of some communication in both English and the local language (Shona). The company provided evidence of its implementation in visual (informative posters) and oral (in-person meetings) media for the delivery of information to illiterate people or vulnerable groups that include people with disabilities (i.e., deaf, or blind people). In addition, the evidence indicates that the information is available at appropriate locations (i.e., clinics, schools, and business centers).</p> <p>Observations and interviews with stakeholders and company representatives during the site visit confirm information delivery is accessible, and in languages and locations culturally appropriate.</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>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. Not relevant. Information available to auditors including interviews with a sample of stakeholders and members of the onsite management team do not provide evidence the company denies information requests.</p>

Chapter 1.3—Human Rights Due Diligence	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 15 requirements – total number of IRMA Chapter 1.3 Human Rights Due Diligence criteria - 11 requirements – total number Unki surveillance audit criteria; includes 4 items not previously scored (see Section 1.2.1.1) 		
1.3.1.1.	<p>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 evidence, Anglo American Group Human Rights Policy (2021), Unki Mine Arrest and Detention of a Suspect Procedure (2020), Group-level Responsible Sourcing Standard for Suppliers (2019), Reporting and Investigation of Security Incidents Procedure (2021), Use of Firearms Procedure (2022), and Use of Force Procedure (2022), indicates that the company has adopted a Human Rights policy that includes an acknowledgment and commitment to respect all internationally recognized human rights supported by site-level procedures.</p>
1.3.1.2.	<p>The policy shall:</p> <ol style="list-style-type: none"> a. Be approved at the most senior level of the company; b. Be informed by relevant internal and/or external expertise; c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project; d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders; e. Be reflected in the mining project's operational policies and procedures. 	<p>The evidence, Anglo American Group Human Rights Policy (2021), is a corporate document that reflects operational policies and procedures aligned with the United Nations Global Compact and the Voluntary Principles on Security and Human Rights. The evidence indicates that the accountability for policy implementation remains with the Group Chief Executive and with the Chief Executives of the business units. The evidence indicates that this policy was communicated internally to all employees and publicly to stakeholders (Q3 and Q4 CEF Meetings, 2021) and to new employees (New Employee HR Induction Form revised Blank, 2022). The human rights policy is also publicly available on the company's website. Interviews with a sample of employees, stakeholders (i.e., CEF, March 2022) and business partners (i.e., suppliers, contractors) confirm that employees are aware of this commitment and that the operational-level procedures regarding human rights have been implemented at site.</p>
1.3.2.1.	<p>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</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence includes a Voluntary Principles on Security and Human Rights (VPSHR) Risk Assessment (March 2022) and two Social and Human Rights Risk Assessment and Control (SHIRA) matrixes (one was updated in July 2021, the other was updated in May 2022), and indicates that the company has documented its impact assessment methodology, identified, and assessed potential human rights impacts, and</p>

Chapter 1.3—Human Rights Due Diligence	2022	Basis for rating
	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>updated risk registers over time. The SHIRAs indicate that the risk assessment shall be updated annually or when there are significant changes related to the operation.</p> <p>The evidence also includes a Human Rights Due Diligence (HRDD) assessment prepared by third-party Synergy Global Consulting (pty) Ltd (June 2022), which describes the assessment methodology and includes in-country and company context to inform its assessment of potential and actual human rights impacts. The assessment provides a list of salient and non-salient potential and actual human rights impacts for the Unki mine. An attendance register of a CEF community meeting (March 17th, 2022) and the HRDD assessment (Chapter 2.2) indicate that the third-party engaged with community stakeholders of the CEF committee members regarding the HRDD assessment to inform local perception of human rights. Appendix 2 in the HRDD assessment further indicates that the assessment was informed by interviews with company, workers, worker’s representatives, community representatives, and stakeholders.</p>
1.3.2.2.	<p>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 not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Voluntary Principles on Security and Human Rights (VPSHR) Risk Assessment (March 2022), two Social and Human Rights Risk Assessment and Control (SHIRA) matrixes (one was updated in July 2021, and the other was updated in May 2022), and a Human Rights Due Diligence (HRDD) assessment prepared by third-party Synergy Global Consulting (pty) Ltd (June 2022), indicates that the company and the third-party assessments follow a standardized and credible process (a). A presentation from Synergy Global Consulting (pty) Ltd (HRDD Process for Unki Mine – Proposal Overview, no date), provides descriptions of the team’s qualifications and indicates that their HRDD assessment was conducted by competent professionals (b) and that the assessment was informed through consultations with the company and potentially affected rights holders (c).</p> <p>The evidence does not include details to confirm whether the company’s risk registers are updated with information obtained through the external human rights risk assessment.</p> <p>Interviews with a sample of relevant stakeholders and rights holders are needed to confirm if they were meaningfully engaged as part of the human rights risk and impact assessment consultations.</p>
1.3.2.3.	<p>As part of its assessment, the operating company shall document, at minimum:</p> <ol style="list-style-type: none"> The assessment methodology; 	<p>The evidence, a Human Rights Due Diligence (HRDD) assessment prepared by third-party Synergy Global Consulting (pty) Ltd (June 2022), indicates that the company complies with items a-f of this section by including:</p> <ol style="list-style-type: none"> The assessment methodology, pages 20 to 23,

Chapter 1.3—Human Rights Due Diligence		2022	Basis for rating
	<ul style="list-style-type: none"> b. The current human rights context in the country and mining project area; c. Relevant human rights laws and norms; d. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk; e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (i.e., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group; f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. 		<ul style="list-style-type: none"> b) The current human rights context in the country and mining project area, pages 24 to 28, c) The relevant human rights laws and norms, page 25, d) A comprehensive list of the human rights risks related to the mining project, pages 37 to 38, e) The identification of rights holders, pages 37-38, f) The recommendations for preventing, mitigating, and remediating identified risks and impacts, pages 75 to 109.
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.	☑	The evidence, minutes of CEF meeting held May 13, 2022, and SPMC Monthly meetings (July 2022), and interviews with a sample of community leaders indicates that stakeholders were informed of the human rights assessment process, key findings, and had the opportunity to provide feedback.
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.	☑	This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, an Integrated SHE Performance Monitoring, Evaluation and Analysis Plan (2021), a site-level SHE Organigram to implement the company's Social Way policy (no date), and the Human Rights Due Diligence (HRDD) assessment prepared by third-party Synergy Global Consulting (pty) Ltd (June 2022), indicates that the company considers risks on an ongoing basis and the risks are effectively integrated at the mine site operational level.
1.3.3.2.	Responding to human rights risks related to the mining project:	☑	The evidence, a Due Diligence Report of the security company providing services at Unki (February 2021), CEF Meeting Minutes (September 16, 2021), and Human Rights Due Diligence (HRDD) assessment prepared by third-party Synergy Global Consulting (pty)

Chapter 1.3—Human Rights Due Diligence	2022	Basis for rating
<ul style="list-style-type: none"> a. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s). b. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks. c. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities. 		<p>Ltd (June 2022), indicates that human rights issues were assessed and results regarding security and human rights were disclosed to stakeholders. During the CEF meeting, associated mitigation measures including human rights awareness-raising was discussed. Other potential environmental risks that could impact human rights (i.e., pollution, access to clean water, and/or TSF failure) were also identified with associated mitigation plans. The document, Unki Mine Social Management Plan (2021), includes a comprehensive list of identified social and human rights impacts and risk management activities.</p> <p>Onsite interviews with a sample of stakeholders and security personnel provided evidence that they are aware of potential human rights issues and demonstrated good knowledge in the implementation of related procedures (i.e., use of force) to prevent human rights impacts. Interviews with a sample of potentially affected rights holders are needed during the next full assessment to confirm stakeholders were offered means to ensure that they had the capacity to understand human rights risks and remedies and that mitigation plans, if needed were developed through a consultative process.</p>
<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: <ul style="list-style-type: none"> Cease or change the activity responsible for the impact; and 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 	—	<p>Not relevant. The evidence Human Rights Due Diligence (HRDD) assessment prepared by third-party Synergy Global Consulting (pty) Ltd (June 2022), and meeting minutes of the CEF committee, that includes community representatives, from September 16, 2022 and interviews with a sample of workers, including contractors and other stakeholders indicates that the mine has not caused an actual human rights impact. The evidence includes a. The HRDD assessment does not identify an actual human rights impact caused by the Unki operation or its business relationships. The CEF meeting minutes indicate that the company has discussed potential human rights risk caused by the operation with the community representatives and solicited their opinion on whether the mine or its contractors have caused an actual human rights impact. The minutes indicate that no actual human rights impacts were identified.</p>

Chapter 1.3—Human Rights Due Diligence	2022	Basis for rating
	<p>activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;</p> <p>c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and</p> <p>d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.</p>	
1.3.4.1.	<p>The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence includes group-level Voluntary Principles on Security and Human Rights (VPSHR) Annual Reports (2019 and 2020), that provide a brief overview of VP training conducted and VP related incidents for the Unki mine, indicating that the company monitors human rights risks related to security arrangements. The evidence, Protection Services Annual Performance Report (2021), indicates that the company monitors human rights training of security personnel.</p> <p>The evidence does not include details to confirm whether the company monitors salient adverse human rights risks posed by operational activities other than the security contractors and whether monitoring draws on feedback from internal and external sources, including affected rights holders. Interviews with company staff are needed during the next full audit to confirm that salient adverse human rights risks and impacts are monitored and effectively addressed, and whether monitoring draws on feedback received from stakeholders.</p>
1.3.5.1.	<p>The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and</p>	<p>The evidence, Voluntary Principles on Security and Human Rights Reports (2020 and 2021), indicates the company is reporting publicly on the effectiveness of its human rights due diligence activities for the Unki mine, including the methods used to determine the salient human rights issues, salient risks and impacts that were identified, and actions taken by the company to prevent, mitigate and remediate the human rights risks and impacts. The report from 2021 indicates that security-related impacts on</p>

Chapter 1.3—Human Rights Due Diligence	2022	Basis for rating
	impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts.	<p>human rights risk are among the salient human rights issues across the company, and that the company has trained its personnel, including its security providers on the Voluntary Principles on Security and Human Rights to prevent human rights risks and impacts, and has resolved any security-related grievances.</p> <p>The evidence does not include details to confirm human rights due diligence effectiveness, including salient human rights security risks and impacts and mitigation, are publicly reported.</p>

Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 11 requirements – total number of IRMA Chapter 1.4 Complaints and Grievance Mechanism and Access to Remedy criteria - 3 requirements – total number Unki surveillance audit criteria; includes 1 item not previously scored (see Section 1.2.1.1) 		
1.4.1.1.	<p>Critical The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.</p>	<p>The evidence provided by the company includes:</p> <ul style="list-style-type: none"> • Social Incidents and Grievance Register Q1 2022, • Unki Mine Poster, that explains how to report a grievance or an incident, in English and Shona, • Grievance Procedure (2021 and 2022), and Acknowledgement and Feedback Letters to reports of social incidents (February 11, 2022), • Example of Grievance acknowledgment (from a resident in Dzikamidzi village, February 2022) and Feedback sent in March 2022, and • Kodobo Meeting Minutes (December 21, 2021) which indicate that the Grievance procedure was presented to community stakeholders. Participants included 10 stakeholders from Kodobo, villages 2,3,4, and the Impali village 2. • Procedure for Complaints (version 10, 2022).

Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy	2022	Basis for rating
		<p>The evidence indicates that the company has developed an operational level grievance mechanism for stakeholders to raise and seek resolution of complaints and grievances, including employees and contractors.</p> <p>The established procedure (Procedure for Complaints, version 10, 2022) indicates that the company has a system in place to manage the registration, categorization, investigation, resolution, and the prevention of presented complaints and grievances related to the mine.</p> <p>Interviews with stakeholders, union members, employees, and contractors (from local communities) indicate that the grievance mechanism is well understood and that all grievances and complaints receive prompt feedback. Stakeholders acknowledge that the communication channels to raise comments and concerns with the mine exist and that the mine is always open to dialogue. This was verified in a group meeting with Village 17, including the participation of agricultural and health representatives.</p>
1.4.2.1.	<p>The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:</p> <ol style="list-style-type: none"> 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; How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase; How confidentiality of a complainant’s identity will be respected, if requested; The ability to file anonymous complaints, if deemed necessary by stakeholders; 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; 	<p>The evidence provided by the company includes:</p> <ul style="list-style-type: none"> - Unki Mine Grievance Procedure (2021 and 2022) - Village Health Workers Register and Meeting Minutes (August 26, 2021) - Unki Mine Poster: Reporting a Grievance or an Incident with a Social Consequence (English and Shona), - Meeting with Gutsaruzhinji, Adare Farm and Dzikamidzi communities (February 15, 2022), - Unki Mine Stakeholder Engagement Plan (version 1, 2022) <p>and indicates that six of the seven requirements (a, b, c, d, f, and g) have been covered or considered in the design of the grievance procedure. The procedure indicates alignment with the UN Guiding Principles on Business and Human Rights (i.e., legitimate, accessible, predictable, equitable, transparent, rights compatible, and a source of continuous learning, based on engagement and dialogue). The procedure establishes methods of registration, analysis, and resolution and time limits for each stage of complaint handling. This includes the option of registering complaints anonymously, if required. An appeal can be made if the original resolution does not satisfy the complainant.</p> <p>Although the company has not designed the procedure jointly with its stakeholders, the company has encouraged discussion and requested feedback on the procedure. In addition, there is evidence of stakeholder engagement (CEF meetings) where complaints are publicized, and responses provided by the company.</p>

Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy		2022	Basis for rating
	<p>f. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and</p> <p>g) How complaints and grievances and their resolutions will be tracked and recorded.</p>		The evidence does not include (e) specific measures to provide aid to those who may have difficulties in using the grievance mechanism procedure (i.e., women, children, marginalized or vulnerable groups).
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.	✔	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Meeting with Communities Around the Mine (2021), indicates that the company conducts public meetings and disseminates information about the grievance mechanism, its scope of application, and its procedures to its stakeholders. Meeting minutes from the CEF committee (2021) indicate that grievance procedures are explained to community representatives. During these meetings, company managers emphasize to managers the importance of disseminating information to the members of their communities. The evidence includes photos of the distribution and placement of brochures and posters explaining how to use the grievance mechanism. The evidence indicates that informative material on the grievance mechanisms is provided in English and the local language, Shona.</p> <p>Interviews with a sample of stakeholders and their representatives during the site visit indicate awareness of the grievance mechanism and that they received information on procedures in formats and languages that were accessible and understandable to them.</p>

Chapter 1.5—Revenue and Payments Transparency		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 14 requirements – total number of IRMA Chapter 1.5 Revenue and Payments Transparency criteria - 8 requirements – total number Unki surveillance audit criteria; all previously assessed 			
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	✔	The evidence includes two Tax and Economic Contribution Reports for 2020 and 2021 and two Integrated Annual Reports for 2020 and 2021, which were published within 12 months of the reporting year, are available on Anglo American’s website, and include information on payments made to the government of Zimbabwe. The evidence indicates that Anglo

Chapter 1.5—Revenue and Payments Transparency	2022	Basis for rating
	mining project is located. The report shall be made public within 12 months after the end of each financial year.	American participates in the Extractive Industries Transparency Initiative (EITI) and discloses its payments made to the government of Zimbabwe.
1.5.1.3.	<p>The types of payment disclosed shall include as a minimum, as applicable:</p> <ul style="list-style-type: none"> a. The host government's production entitlement; b. National state-owned enterprise production entitlement; c. Profits taxes; d. Royalties; e. Dividends; f. Bonuses, such as signature, discovery and production bonuses; g. License fees, rental fees, entry fees and other considerations for licenses and/or concessions; h. Payments for infrastructure improvements; and i. Any other significant payments and material benefits to government, including in kind payments. 	<p>The evidence, two Tax and Economic Contribution Reports for 2020 and 2021, and two Integrated Annual Reports for 2020 and 2021, lists the following information on a per-country basis:</p> <ul style="list-style-type: none"> - Total tax and economic contribution - Wages and related payments - Corporate social investment - Total country procurement <ul style="list-style-type: none"> - In-country procurement - Capital expenditure - Total taxes and royalties borne and Taxes collected <ul style="list-style-type: none"> - Corporate income tax - Royalties and mining taxes - Other payments borne - Taxes collected <p>The evidence indicates that the report includes the following types of payments: (c), (d), (g), and (i).</p> <p>The evidence does not provide the detail necessary to confirm whether the remaining types of payments are included in the report or if they correspond to the remaining types of payments listed in the requirement.</p>
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>The evidence, including two Tax and Economic Contribution Reports for 2020 and 2021 and two Integrated Annual Reports for 2020 and 2021, includes information on payments on a per-country and per-project basis, but does not include the details contemplated in letters (a), (b), (e), (f), and (h) of the previous requirement (1.5.1.3).</p>
1.5.2.2.	<p>The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:</p> <ul style="list-style-type: none"> h) Mine production, disaggregated by product type and volume; i) Revenues from sales, disaggregated by product type; j) Material payments and other material benefits to government as listed in paragraph 1.5.1.3, 	<p>The evidence, including two reports on Annual Results for 2020 and 2021 and two Integrated Annual Reports for 2020 and 2021, includes a summary of the mine's production, which is disaggregated by type and volume (a), and its revenues (b). Anglo Platinum anti-corruption documents prohibit payments to politicians' campaigns, political parties, or related organizations (f).</p> <p>The evidence does not include details to confirm that public reports include information as listed in sub-requirements (c), (d), (e), and (g).</p>







Chapter 1.5—Revenue and Payments Transparency		2022	Basis for rating
	<p>disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department);</p> <p>k) Social expenditures, including the names and functions of beneficiaries;</p> <p>l) Taxes, tariffs or other relevant payments related to transportation of minerals;</p> <p>m) Payments to politicians' campaigns, political parties or related organizations; and</p> <p>n) Fines or other similar penalties that have been issued in relation to the project.</p>		
1.5.3.2.	<p>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> <p>o) Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and</p> <p>p) Provide links on its external website to completed and up-to-date company forms for its operation, if the EITI implementing country has completed at least one validation.</p>		<p>The EITI website reflects Anglo American's support at corporate level, but EITI is not being implemented in Zimbabwe. The evidence, Tax and Economic Contribution 2020 and 2021, indicates that the company has a corporate commitment to engage with the EITI initiative consistent with the multi-stakeholder process.</p> <p>The evidence does not include links on its external website to completed and up-to-date company forms.</p>
1.5.4.1.	<p>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>The evidence includes:</p> <ul style="list-style-type: none"> - A Title of Special Mining Lease from October 5th, 2009, for the Unki mine to operate in the Gweru mining district. This document states that the Unki company's area description and registered mining claim were published in the Extraordinary Government Gazette on March 28th, 2008. This publication is accessible online to the public. - A tax agreement letter with the local government, published in the Government Gazette on February 12th, 2010. This letter announces that the Unki company has been granted a special mining lease and is accessible online to the public. <p>The evidence does not include confidential business information regarding material terms for mineral exploration development and production agreed between the operating company and government entities.</p>
1.5.5.1.	<p>Critical The operating company shall develop, document and implement policies and</p>		<p>The evidence, Responsible Sourcing Standard for Suppliers (2020), the Code of Conduct (2022), indicates that the company has developed anti-bribery and anti-corruption policies</p>

Chapter 1.5—Revenue and Payments Transparency		2022	Basis for rating
	procedures that prohibit bribery and other forms of corruption by employees and contractors.		that apply to its own employees and contractors. The evidence, Suppliers Training on Responsible Sourcing Standard (March 2022) and a New Employee Induction Form (last updated March 2022), indicates that these policies are communicated to employees and contractors. Interviews with a sample of workers, including workers' representatives and contractors, confirm awareness of the policies and procedures that prohibit bribery.
1.5.5.3.	Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.	✓	The evidence, Suppliers Training on Responsible Sourcing Standard (March 2022) and a New Employee Induction Form (last updated March 2022), indicates that relevant policies are communicated to employees and contractors. Interviews with employees and contractors acknowledge a good comprehension of the company's policies and procedures.

Principle 2: Planning for Positive Legacies

RATING LEGEND

Description of performance

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

Note on Chapter 2.1:

Chapter 2.1 Environmental and Social Impact Assessment and Management criteria has differing applicability based upon a mine site's status, new vs. existing. In October 2020, the IRMA Board approved changes to Chapter 2.1 making a core set of requirements related to assessment of environmental and social risks applicable to existing mines that were not relevant during IRMA's launch.⁸ Chapter 2.1 criteria in this section reflects IRMA requirements in place between May 2022 and February 2023, including glossary definitions of 'existing' and 'new' in the IRMA Standard (June 2018).

Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 16 requirements – total number of IRMA Chapter 2.1 Environmental and Social Impact Assessment and Management criteria <i>for existing mines</i>. - 15 requirements – total number Unki surveillance audit criteria; includes 3 items 'not relevant' and included during IRMA's launch (see Chapter 2.1 Note, above). 		

⁸ For more information, see the IRMA Guidance Note on Chapter 2.1: <https://responsiblemining.net/wp-content/uploads/2021/07/Chapter-2.1-ESIA-Guidance-Final-2020.pdf>

Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
2.1.3.1.	<p>Critical (New Mines) The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.</p> <p>Critical (Existing Mines) The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental and social impacts associated with the mining operation.</p>	<p>Unki is an existing mine. This requirement was considered ‘not relevant’ in the initial IRMA audit (2019) published in February 2021. The evidence indicates that the company has prepared an Environmental Impact Assessment (EIA) for all major developments, which include a comprehensive evaluation of potential environmental and social impacts related to the project. The EIAs are part of the permitting process to comply with local regulations. The EIAs reviewed include:</p> <ul style="list-style-type: none"> • Scott Wilson Resources Consultants, 2003: Final EIA Report for Unki Mine, Volume I. 127p., which assesses impacts on the biophysical and socio-economic environment of the project in general, • Q Partnership, 2005: Addendum to the EIA for Unki Platinum Mine Project, 48 p., which assesses impacts on the biophysical and socio-economic environment caused by updates to the project scope, • Black Crystal Consulting, 2008: EIA Report for a housing development near Shurugwi Town. 89p., which assesses impacts on the biophysical and socio-economic environment of the Unki housing project • MKola Investments, 2014: EIA for the 11 KV Unki Overhead power supply line; 189p., which assesses environmental and social impacts caused by the installation of the powerline • Ascon Africa; 2018: EIA Proposed Unki Smelter; 239p, which assesses environmental and social impacts caused by the installation of the smelter facility.
2.1.7.1.	<p>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>The evidence, including risk assessment matrixes, workplace risk assessment and control (WRAC) registers, operational risk management matrixes, and monitoring reports of Environmental Management Plans (EMPs), indicate that the company has developed and maintains a system to manage environmental and social risks and impacts throughout the life of the mine. The evidence includes:</p> <p>AA, September 2021: Unki Mine - Social and Human rights risk assessment and control (2021 Shira Updated 300921.xls)</p> <p>AA, Feb 2022: Unki Mine Baseline risk assessment (xls). This tool includes:</p> <p>Anglo American (AA), Q1 2021: EMP & MR, 35p.</p> <p>AA, Q2 2021: EMP & MR, 35p</p> <p>AA, Q4, 2021: EMP & MR, 35p</p> <p>AA, Q1, 2022: EMP & MR, 35p</p>

Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
		<p>Workplace Risk Assessment and Control (WRAC) for several aspects including permitting process, mining, beneficiation, exploration, and non-core, source area risks (including supply chain, social performance, protection services, human resources management, and other services at the mine site)</p> <p>AAP, Unki, 2022: mine-wide significant environmental aspects and impacts register, 6p.</p> <p>AAP, Unki, 2020: Occupational Health and Safety Legal and other requirements Register, Volume I. 370p.</p> <p>AAP, Unki, 2020: Environmental legal and other requirements Register, Volume II, 89p</p> <p>Three managers in charge of environmental and social impacts and risks were interviewed to describe roles and responsibilities and indicated that the company has implemented a system to manage environmental and social risks and impacts.</p>
2.1.7.2	<p>An environmental and social management plan (or its equivalent) shall be developed that, at minimum:</p> <ul style="list-style-type: none"> q) 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; g. Assigns personnel responsible for implementation of various elements of the plan; and h. Includes estimates for the resources needed to implement the plan. 	<p>The evidence indicates that the company has developed environmental and social management plans including:</p> <p>Scott Wilson, 2003: Unki Mine Environmental Management Plan (EMP) Volume II, 71p</p> <p>AA, Q4 2021: Unki complex quarterly Environmental Management Plan and monitoring report; 34p (Q-EMP&MR)</p> <p>The evidence indicates that the company prepares a quarterly environmental management plan (EMP) & monitoring report (MR) to review the performance of their EMP implementation. Some examples were reviewed including:</p> <p>Anglo American (AA), Q1 2021: EMP & MR, 35p.</p> <p>AA, Q2 2021: EMP & MR, 35p</p> <p>AA, Q4, 2021: EMP & MR, 35p</p> <p>AA, Q1, 2022: EMP & MR, 35p</p> <p>Each report describes:</p> <ul style="list-style-type: none"> Environmental permits obtained or to be obtained Environment risks EMP and MR for the mine operational phase EMP for Sewer Maturation Ponds EMP & MR for Impali Source Housing project EMP for Smelter Project operational phase EMP & MR for the water augmentation project

Chapter 2.1—Environmental and Social Impact Assessment and Management		2022	Basis for rating
			<p>Surface water, groundwater quality results, air emissions results, and waste management plan.</p> <p>These EMPs and MRs are based on the impact assessment results of the EIA's as listed in 2.1.3.1. The EMPs outline specific mitigation actions to address environmental and social impacts identified through ESIA processes (a) and list the personnel responsible for implementing management actions (b).</p> <p>The evidence does not include details to confirm that resources needed for the continued implementation of the plan are estimated and considered in the company's budget allocation (c).</p>
2.1.8.1.	<p>As part of the ESMS, the operating company shall establish a program to monitor:</p> <ul style="list-style-type: none"> r) The significant environmental and social impacts identified during or after the ESIA process; and i. The effectiveness of mitigation measures implemented to address environmental and social impacts. 	●	<p>(a) The 2003 EIA (reviewed in 2.1.3.1) identifies in Chapter 6 the potential impacts associated with the project such as the displacement of people, and construction and operational phase elements, including biophysical and socioeconomic aspects.</p> <p>The Unki Mine EMP (2003, Scott Wilson, 71p.) presents the main components of the monitoring program for surface water & groundwater (section 4.1.6) and air quality and noise in section 4.2.</p> <p>(b) The EMP is being implemented with the quarterly EMP & MR (see 2.1.7.2). In these reports, the company provides an overview of every component of the mine including Unki mine, sewer maturation ponds, housing project, the smelter, and water augmentation project. The reports provide a description of compliance evaluations and include water quality data, air emissions results, and the waste management plan.</p> <p>The evidence does not include details to confirm that the company monitors socioeconomic impacts, or the effectiveness of mitigation measures related to air quality and noise at receptors along the perimeter of the mine.</p>
2.1.8.2.	The monitoring program shall be designed and carried out by competent professionals.	●	<p>The evidence includes:</p> <p>Toltecs Ltd, 2021: Capability statement, 12p. including some credentials for EMA certificate for Toltec for air quality and emissions assessment following EMA's requirements.</p> <p>CV of the Operational risk coordinator at Unki mine.</p>


Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
		<p>Scott Wilson Resources Consultants, 2003: Final EIA Report for Unki Mine, Volume I. 127p., which assesses impacts on the biophysical and socio-economic environment of the project in general.</p> <p>AA, May 2021: Appointment of environmental assistant in terms of Anglo Environment Way Management System aligned to ISO 14001:2015 for accountable for monitoring of environmental impacts of the operation.</p> <p>Interviews with site managers indicate that environmental and social monitoring is conducted by a combination of internal and external specialists. The evidence does not include information to confirm social monitoring program design and implementation competencies.</p>
2.1.8.3.	<p>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.</p>	<p>The evidence, site-level SHE Policy (Unki-MIN-SHE-POL-0001, April 2022) indicates that the mine shall make SHE (Safety, Health, and Environment) information available to interested parties upon request. This policy is implemented through the grievance mechanism (Grievance Procedure, 2022, version 10) through which staff, contractors, community members, state agencies, NGOs, and any other stakeholders can raise issues including information requests.</p> <p>The evidence includes a grievance register for the year 2021 and indicates that the company maintains a system to document grievances. The register has 21 entries, none of which include requests for independent monitoring of key impact indicators.</p> <p>No evidence was presented to suggest stakeholders have requested funding to hire experts, enabling independent review or monitoring if needed. This aspect will be re-evaluated at the next full assessment.</p>
2.1.9.1.	<p>(New Mines) As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:</p> <ol style="list-style-type: none"> The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3); Methodologies for the collection of environmental and social baseline data (see 2.1.4); 	<p>Unki is an existing mine. The 2003 Unki Mine EIA report in Chapter 6 presents a brief description of public consultations conducted between 1998 and 2002, with 21 interactions. The list of interested and affected parties included:</p> <ul style="list-style-type: none"> 13 people working for local government 3 people representing ZIMASCO (other mining company) 4 people presenting the rural district council of Tongogara and Shurugwi. <p>The 2008 Unki House Project EIA includes in Chapter 7 a description of the public consultation. The stakeholder list includes five (5) people representing five (5) regulatory agencies, three (3) landowners, and one (1) representing illegal settlers/dwellers.</p>

Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
	<p>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);</p> <p>d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c);</p> <p>e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and</p> <p>f. The final conclusions and recommendations of the ESIA (see 2.1.6.1).</p> <p>(Existing Mines) The operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine.</p>	<p>The 2016 Smelter EIA does not include Appendix 4 related to public consultation. However, the company provided evidence of some type of consultation related to the smelter permitting process. The evidence includes:</p> <ul style="list-style-type: none"> - Completed questionnaires for soliciting views of government departments, 2015, 18p. 9 records - Completed questionnaires for soliciting views of key stakeholders, 2015; 58p; 29 records <p>Interviews with company personnel indicate stakeholders are involved in the impact assessment during the preparation of the EIA.</p> <p>The evidence does not provide details to confirm that the company has implemented a process for effective consultation, review and comment of all stakeholders as in (a) to (e).</p>
2.1.9.2.	<p>(New Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process.</p> <p>(Existing Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the development of options to mitigate the potential impacts of the mine.</p>	<p>Unki is an existing mine. This requirement was considered ‘not relevant’ in the initial IRMA audit (2019) published in February 2021. The evidence, including several EIAs and CEF (Community Engagement Forum) Meeting Minutes with community representatives (September 2021), indicates that the company has a consultation process that encourages stakeholders to express their concerns.</p> <p>The 2003 Unki Mine EIA report in Chapter 6 presents the summary of the interactions with stakeholders, from 1998 to 2002, and it includes the list of key concerns.</p> <p>The 2008 Unki Housing project EIA in Chapter 7 presents a summary of the public consultation conducted in June and July of 2008, which includes the issues raised.</p> <p>The 2014 Unki Lucilia Poort 11Kv Powerline EIA, includes in Chapter 5, a description of the methodology used in stakeholders' consultation. Table 5.1 provides the list of 17 stakeholders and their main views on the environmental and social impacts of the project.</p> <p>The 2016 Unki Smelter EIA in Section 5.5.14 describes the public consultation conducted for this project. The views of the stakeholders are presented in relation to the environmental and social impacts of the smelter.</p> <p>Interviews with stakeholders and mine site personnel indicate that the company has established a CEF with an environmental sub-committee, where the environmental monitoring program is the main point in the agenda, but other issues are reviewed. The</p>

Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
		<p>CEF has a community emergency committee to inform and make the community aware of potential emergency scenarios.</p> <p>The evidence does not provide details to confirm that efforts have been made to involve stakeholders in data collection or the development of mitigation options outside of the preparation of EIAs.</p>
2.1.9.3.	<p>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.</p>	<p>The company established an environmental sub-committee in March 2021 named the Community Environment Committee (CEC), which is involved in participatory monitoring of identified impacts, including air and water quality monitoring, and in developing and implementing management initiatives. Members of the CEC are elected members of five (5) potentially affected communities (Chironde, Village 17, Makwikwi, Adare Farm, Gutsaruzhinji). These representatives are also members of the main local accountability forum (CEF).</p> <p>The evidence includes Meeting Minutes of the CEF committee from March 2021, and indicates the attendance of 21 people including 13 CEF members. The minutes indicate that the establishment of the environmental subcommittee (CEC) was discussed, including the nomination of representatives by potentially affected villages, and subsequent training of elected CEF members.</p> <p>The CEC was launched in April 2021, with the theme “sustained engagement and participatory culture in environmental management”, with 23 people in attendance, including 6 Unki Mine employees, a representative of the health ministry, and one from the environmental executive office of the Tongogara Rural District Council (TRDC). Item #8 in the minutes, presents the terms of reference for this committee, which include the participation in monitoring exercises, solicitation of recommendations (non-binding) to the monitoring plans, community dialogue in environmental matters, the identification of risks and impacts, raising awareness, the facilitation of discussions on any emerging issues and identification of corrective actions.</p> <p>The evidence, Q3 CEF meeting minutes (September 2021), indicates that the community representatives were not able to participate in the Q2 monitoring because of COVID-19 restrictions, but that the members will be notified and involved in Q3 monitoring plan.</p> <p>During interviews with company personnel, the staff described the concept of the CEC committee. Interviews with a sample of stakeholders, who are not members of the CEC committee, indicated that they are aware of monitoring being developed near the communities, including samples being taken at rivers and wells. They</p>

Chapter 2.1—Environmental and Social Impact Assessment and Management		2022	Basis for rating
			<p>recognize that the company shares results from the monitoring program in meetings with leaders and the community.</p> <p>The evidence does not include information to confirm stakeholder consultation effectiveness, or stakeholder participation in the scope and design of the social monitoring program.</p>
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.	⊕	<p>As described in 2.1.9.3 the company is encouraging and facilitating stakeholders to participate in the implementation of some components (air and water quality) of the monitoring program.</p> <p>As mentioned in 2.1.9.3, the evidence does not include social components or monitoring program participation by stakeholders.</p>
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.	⊕	<p>Unki is an existing mine. This requirement was considered 'not relevant' in the initial IRMA audit (2019) published in February 2021. The evidence includes a sample of completed stakeholder questionnaires (December 2015) soliciting their views regarding the Unki Smelter project, which is covered in an EIA from 2016. The questionnaire includes answers to specific questions asked by the company. This indicates that the company records stakeholder comments in relation to ESIA projects.</p> <p>The evidence does not include documented comments for other EIAs or documentation of how the company responded to stakeholder comments.</p>
2.1.10.1.	<p>(New Mines) The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner.</p> <p>(Existing Mines) At minimum, a summary of the significant environmental and social impacts and risks associated with the mining operation shall be made public.</p>	⊕	<p>Unki is an existing mine. This requirement was considered 'not relevant' in the initial IRMA audit (2019) published in February 2021. The evidence, Unki Safety, Health and Environmental (SHE) Policy (AA, April 2022), indicates SHE information is available to interested parties upon request. This evidence is complemented with examples of quarterly EMP and monitoring reports (2020 and 2021) sent to the regulatory agency. The reports include a section related to environmental risks, and discusses the impacts and mitigations related to each permit. The evidence does not include the information to confirm ESIA reports are publicly available, including supporting data and analyses.</p>

Chapter 2.1—Environmental and Social Impact Assessment and Management		2022	Basis for rating
2.1.10.3	The environmental and social management plan shall be made available to stakeholders upon request.	✔	<p>As indicated in 2.1.10.1 & 2.6.2.6 the company has a policy in place to make information publicly available upon request. Unki's Register does not indicate that a stakeholder request has been made. The evidence provided includes:</p> <p>AA, 2021: Social Incidents and Grievance Register and Analysis as of 30 November 2021, 5p.</p> <p>AA, 2022: Unki Complex – Safety, Health and Environmental (SHE) Policy, 1p.</p> <p>AA, 2022: Unki Complex - Grievance Procedure, 17 p.</p> <p>Interviewed personnel indicate that every report submitted to the environmental agency can be requested by stakeholders. Interviews with stakeholders indicate not all individuals or groups in the area around the mine have the capacity to make such a request due to lack of electricity or connectivity (i.e., phone or email), and this will be reviewed at the next full assessment.</p>
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.	⊕	<p>The evidence, SHE policy (AA, April 2022) indicates that the company provides information on safety, health, and the environment upon request. The evidence listed in 2.1.9.3 indicates that the company discloses some of the data collected from its monitoring programs with the environmental sub-committee.</p> <p>The information provided does not indicate that the company discloses findings of environmental and social monitoring program publicly or through the stakeholder's mechanism as established by the CEF committee in 2021.</p>

Chapter 2.1—Environmental and Social Impact Assessment and Management	2022	Basis for rating
<p>2.1.10.5 .</p> <p>(New Mines) The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means.</p> <p>(Existing Mines) The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means.</p>		<p>Unki is an existing mine. The company has a policy in place to make information publicly available upon request. As mentioned in 2.1.9.3, the company discloses to the environmental sub-committee some of the data collected in its monitoring program. The CEF meeting minutes dated May 2022 indicate that the company has disclosed to 25 attendees some elements related to the E&SMP. Anglo American Platinum has disclosed the Environmental, Social and Governance report for 2021, presenting aggregated information on its six mines, including Unki.</p> <p>The evidence does not provide the information to confirm findings of its environmental and social monitoring programs, including monitoring data and methodologies are publicly available. The ESMS information available is not disaggregated by mine, which makes interpretation of the data as it relates to the Unki mine unreachable.</p>

Chapter 2.2—Free, Prior and Informed Consent (FPIC)

This chapter was not assessed as part of the Unki initial or surveillance audit.

Chapter 2.3—Obtaining Community Support and Delivering Benefits	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 10 requirements – total number of IRMA Chapter 2.3 Obtaining Community Support and Delivering Benefits criteria - 6 requirements – total number Unki surveillance audit criteria; includes 5 items not previously scored (see Section 1.2.1.1) 		
2.3.2.3.	<p>For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.</p>	<p>Unki is an existing mine. This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, a Grievance Acknowledgement Letter to a community member of Dzikamidzi (February 2022), and respective Feedback Letter (March 2022), Social Commitments Register Q1 (2022), and Social Performance Report (Q1 2021), indicates that the company maintains an ongoing relationship with communities and its representatives, either through informational meetings (for example the Dzikamidzi, Adare and Gutsaruzhinji Meeting February 2022 attendance Register) and through the promotion of development activities, for example supporting educational centers including the Mangwende, Rugare, and Selukwe High Schools. The evidence, including interviews and a sample of community meetings, and a sample of appreciation letters (2021) indicates that those involved in the meetings and promotional events support the company.</p> <p>Additional evidence provided (Winner Notification Letter, 2022) indicates that the mine is recognized for its social performance in its area of influence (it is one of the winners of the Midlands Provincial Responsible Business and CSR Awards 2022 offered by the business association for corporate social responsibility CSR Network Zimbabwe - CSRNZ). Also, there are letters of appreciation to Unki from Mangwende High School for the development of Rugare Secondary School (2021); from Selukwe Chrome High School for the renovation and equipping of the science laboratory (2021), and from the Shurugwi Association for People with Disabilities (SAPD) for the donation of food to members of the association.</p> <p>Interviews with a sample of stakeholders indicate that the economic and technical support provided by the mine is well received. Some interviewees indicated that they would appreciate more frequent support. One stakeholder shared a belief that some communities received more support from the mine than others.</p>
2.3.3.1	<p>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</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, including a sample of CEF Meeting Minutes (2021 and 2022), meeting minutes of a Village Health Worker Engagement meeting (August 2021), documentation of a Community Health Baseline Workshop and Attendance Register (January 2020), a meeting on Stakeholder Feedback to the Community Health</p>

Chapter 2.3—Obtaining Community Support and Delivering Benefits	2022	Basis for rating
	contributions to community development initiatives and benefits in affected communities.	<p>Baseline Workshop (December 2020), and Stakeholder Interview information collected for a Socio-Economic Development and Social Transition Assessment and Plan (LiD Agency, September 2021, Chapters 2 to 4), indicates that the company has provided opportunities for the population and/or their representatives to express their expectations of benefits. The programs developed by the company reflected the consideration of the requests made by the participants of communities. Examples of projects developed in collaboration with the community include the Takura Social Development Program (sample of a quarterly report from Q1 2021), which includes an agenda of activities aimed at boosting the development of agricultural activities in the area. Likewise, the company has developed other education-oriented activities as required by the community. As an example, the company implemented a science laboratory at Selukwe Chrome High School as indicated by a MoU signed between the school and the company (January 2019).</p> <p>Documental evidence of a collaborative process to guide company contributions is echoed in interviews with affected stakeholders and local government.</p>
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.	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence presented, a sample of CEF meeting minutes (2021), indicates that the company has engaged the communities in its area around the mine through its representatives. As a result, the company's projects for Socio-Economic Development (SED) respond to the needs raised by the community as indicated in the company's SED Plan (2021).</p> <p>The evidence does not include details on the means to ensure social inclusion of youth, elderly adults, women, and vulnerable groups, and traditionally marginalized groups.</p> <p>Interviews with community groups indicate that youth would value expanded opportunity for meaningful employment and training. Interviews with ancestral authorities indicate they would value additional participation in programs with the mine.</p>
2.3.3.4	Efforts shall be made to develop: s) Local procurement opportunities; g. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence indicates that the company has made efforts to develop:</p> <p>a. local procurement opportunities (a). The evidence, Procedure for Purchases without Contract (Version 4.0, 2019), indicates that the company includes specific guidelines to consider the communities in its area around the mine as suppliers for needed materials or contracting of services. The evidence, Record of Commitments (2021), indicates that the company's commitment includes hiring</p>

Chapter 2.3—Obtaining Community Support and Delivering Benefits	2022	Basis for rating
	<p>h. 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).</p>	<p>unskilled labor from members of local communities by Unki mine, and its contractors and shall meet a minimum quota of 75%. The evidence, Local Recruitment Unskilled Labour (2020 and 2021), indicates that the company (and its contractors) have exceeded the percentage of local labor established within its commitments (a) during the years 2020 and 2021.</p> <p>b. Initiatives that benefit a wide range of community members (b). The evidence, including the Annual Report (2020-2021) of the Takura program that aims to support horticulture, beef, and poultry as separate value-chains, indicates that the company was able to incorporate 52% of female participants into the Takura program, surpassing its planned goal of 40%.</p> <p>c. Self-sustaining mechanisms. Among the activities developed by the company are those that seek to generate competencies in skills and activities that are outside of the mining activities (i.e., the Socioeconomic Development Program focused on agricultural value chains, as well as, school scholarships, hospital equipment, etc.) as indicated by documentation on the Takura program (2020-2021), that aims to support horticulture, beef and poultry as separate value-chains, and meeting minutes from a Local Farmers Liaison Meeting (July 2021) conducted by Tsebo, which is a contractor of Unki and helps local farmers, and Unki's education program that aims to improve education in host communities and to increase the ability of young people to access economic and employment opportunities (World Vision – Anglo American, Step -UP!, December 2021).</p> <p>Interviews with a representative sample of affected community and other relevant stakeholders confirm community development initiatives are in line with sustainability goals to maintain post-closure benefits to communities. Interviews with a sample of stakeholders reliant on the mine for water pumping (i.e., crop irrigation), indicated concern for mechanical systems after mine closure.</p>
2.3.3.5.	<p>The planning process and any outcomes or decisions shall be documented and made publicly available.</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, a sample of CEF committee meetings Attendance Registers (2020-2022) discussing company contributions and their outcomes, an Education Program Launch Presentation by World Vision Zimbabwe (no date) and by Anglo American (March 2022), and corresponding invitation letters to surrounding communities to join the launch of the education program (March 2022), a Takura Midterm Review Report and Attendance Register for the presentation thereof (April 2021), Community Health Program Letters informing district officers and chiefs of Unki's planned programs to improve health (April 2022), and a Community Health Baseline Clearance Letter expressing the district's support of a baseline study</p>

Chapter 2.3—Obtaining Community Support and Delivering Benefits		2022	Basis for rating
			(November 2019), indicates that outcomes of interactions between the company staff and community members are documented. The evidence does not include details to confirm that the planning process is made publicly available.
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.		Community benefits are delivered by the company through social programs, for example the Takura social program (Anglo-Unki Social Development Program Annual Report, 2020-2021), which assists with the implementation of better horticultural practices for farmer representatives from Shungudzevhu, Chuni and Taguta, among others. There are several reports that document the company's and communities' collaborative monitoring of delivered community benefits to evaluate if changes need to be made. Takura Programme mid-term review, quarterly updates and annual reports (2021) include lessons learned, conclusions, and indicators that are utilized to measure actual results versus planned results. Project performance is determined and reported through Anglo American's Progress Report (QTR1 2022). Interviews with a sample of community leaders including traditional chiefs and other stakeholders, indicate mechanisms and agreements to deliver community benefits are satisfactory. One stakeholder reported distribution of community benefits and not equitable. A periodic assessment of community benefit distribution is needed to determine if mechanisms are working as intended.

Note on Chapter 2.4:

Chapter 2.4 Resettlement criteria were not assessed in the Unki initial IRMA audit (2019) published February 2021 except for 2.4.8.1 and 2.4.8.2 based upon IRMA guidance at the time.

Chapter 2.4—Resettlement		2022	Basis for rating
IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.			
- 28 requirements – total number of IRMA Chapter 2.4 Resettlement criteria			

Chapter 2.4—Resettlement	2022	Basis for rating
<p>- 4 requirements – total number Unki surveillance audit criteria; includes 3 items previously considered to be ‘not relevant’ (see Chapter 2.4 Note, above), and 1 item considered relevant and not previously scored (see Section 1.2.1.1 and the Unki IRMA Mine Site Assessment Public Summary Report, February 18, 2021)</p>		
2.4.7.1.	<p>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.</p>	<p>This requirement was considered ‘not relevant’ in the initial IRMA audit (2019) published in February 2021. The evidence, Unki Anglo American Social Way Assessment Tool (last updated January 2018), indicates that the company has undertaken three resettlements to date in 2001 (22 households), 2003 (20 households), and 2006 (6 households). A socio-political map provided by Unki (August 2022) and a Human Rights Due Diligence Assessment (June 2022) indicate that this included resettlements to Village 17 and Village 18 between 1999-2002, and second resettlement of people living in Village 18 to Reitfontein to make way for the TSF, and resettlement of people from the Makwikwi village to other parts of Makwiki to improve the access road to the mine. The RAP was developed in 2002, a post-resettlement assessment was undertaken in 2009 (gaps were identified and addressed), and an external close-out audit was undertaken in 2016. The close-out audit report states all RAP commitments had been fulfilled to a high standard and no RAP-specified tasks were outstanding.</p> <p>The RAP (2002) and a socio-political map provided by Unki (no date) indicate that the communities Village 4, Village 5, Village 6, Village 7, Gutsaruzhinji, Pasimupindu, Adara Farm, and Chironde were resettled by the government following Zimbabwe's independence in 1980 as part of a national land reform and redistribution program. The evidence, a letter from the District Development Coordinator of Shurugwi (July 2020) and from the Shurugwi Town Council (May 2022), indicates that settlers in the Impali and Pasimupindu communities were resettled by the government in 2010 as part of a nationwide resettlement program.</p> <p>The gap analysis and close-out report indicate resettlement objectives have been met. This will be confirmed through interviews with a sample of those resettled during the next full audit.</p>
2.4.7.2.	<p>Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP.</p>	<p>The company provided a sample of completed Stakeholder Commitment Sign-Off form (October 2018 to July 2019) regarding the installation of a water well in Reitfontein, indicating that it keeps some stakeholders informed on the implementation status of some LRP commitments.</p> <p>The evidence does not include documentation of meetings or correspondence with a broad range of stakeholders affected by resettlement informing them of the full implementation of the RAP, including the provision of housing and arable fields.</p>

Chapter 2.4—Resettlement		2022	Basis for rating
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.	✔	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. A socio-political map provided by Unki (August 2022) and a Human Rights Due Diligence assessment (June 2022) indicate that the Unki mine has initiated three mining-related resettlements between 1999 and 2006, which the government executed. The Mine Post Resettlement Close Out Review - Final report (Black Crystal, December 2017) compares the implementation of resettlement actions against the International Finance Corporation (IFC) Performance Standards (2012), the World Bank Guidelines on involuntary resettlement, the UN Guiding Principles on Business and Human Rights (UNGPs), and Anglo American Social Way, and is based on findings from a desktop study, social survey, perception survey, human rights review and stakeholder consultations undertaken by Black Crystal Consulting in October 2016. The report indicates that development assistance to these communities is both supplied by the government and the mine (page 36) and that the mine has made significant improvements in some cases where the government was not able to provide the full support such as improving the availability and accessibility to utilities and social services (page 48). It also indicates that all RAP commitments had been fulfilled to a high standard and that no RAP-specified tasks were outstanding.</p>
2.4.8.2.	<p>The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the operating company shall prepare a supplemental plan that, together with the documents prepared by the responsible government agency, shall address the relevant requirements of this chapter. The company shall include in its supplemental plan, at a minimum:</p> <ul style="list-style-type: none"> t) Identification of affected people and impacts; i. A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations; j. 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 	●	<p>The RAP (2002), a socio-political map provided by Unki (no date), a letter from the District Development Coordinator of Shurugwi (July 2020), and from the Shurugwi Town Council (May 2022), indicate that the communities Village 4, Village 5, Village 6, Village 7, Gutsaruzhinji, Pasimupindu, Impali, Adara Farm, and Chironde were resettled by the government as part of a national land reform and redistribution program and not as a result of the mine being developed. The evidence also indicates that from those communities, only Impali and Pasimupindu were resettled after 2006.</p> <p>The company indicated that the legislative framework does not provide means for the company to collaborate with the government on government-led resettlements.</p> <p>However, because of the proximity to the mine site some of the government-led resettlements are part of the company's socio-economic initiatives as indicated by its Socio-economic Development (SED) Plan (October 2021), which indicates the implementation of initiatives such as helping develop local schools, and meeting minutes of a CEF meeting (March 24, 2022), where the company discussed development projects and donations with stakeholders from government-led resettlements. This is further supported by the evidence, Memorandum of Agreement (January 2018), which indicates that the company has assisted the Tongogara Rural District Council (TRDC) in identifying and developing new boreholes for water supply in Pasimupindu.</p>

Chapter 2.4—Resettlement		2022	Basis for rating
	k. The financial and implementation responsibilities of the operating company in the execution of its supplemental plan.		The evidence does not include an assessment indicating whether the objectives of this chapter have been met in government-led resettlements to determine whether the company's current plans to supplement government compensation and livelihood restoration actions are sufficient.

Chapter 2.5—Emergency Preparedness and Response		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 6 requirements – total number of IRMA Chapter 2.5 Emergency Preparedness and Response criteria - 3 requirements – total number Unki surveillance audit criteria; all items were previously scored 			
2.5.1.1.	<p>Critical All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in <i>United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining</i>.</p>		<p>The evidence includes:</p> <ul style="list-style-type: none"> · Business Continuity Management Plan (May 2022), · Community Emergency Preparedness and Response Plan (May 2022), and · Emergency Preparedness and Response Plan (EPRP) (October 2021). <p>The EPRP includes a list of the 20 potential emergency situations and 28 risk scenarios applicable to the EPRP (page 2/29). The EPRP is partially aligned to the guidelines set forth in United Nations Environment Program, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining. Examples of stakeholder training records (February 2021 and March 2022) were provided, and interviews with employees confirm a proper acknowledgment of EPRP.</p> <p>The evidence does not include an integrated site-wide plan consistent with the UN APELL for Mining by competent professionals (i.e., CVs, experience), including identification and participation of all potentially affected stakeholders in plan development, testing (i.e., drills), and implementation of an overall emergency response plan. And, while communities in the area around the mine may be identified, the agency of potentially affected individuals (i.e., their age, level of ability, economic status, access to communication, flee from hazards, etc.), and potential vulnerabilities are not part of the assessment planning process.</p>

Chapter 2.5—Emergency Preparedness and Response		2022	Basis for rating
2.5.1.2.	<p>The operating company shall:</p> <ul style="list-style-type: none"> u) 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 v) Update the communications contacts of the emergency response plan at least annually. 	⊕	<p>The evidence includes mock drill reports of emergency drills developed for four (4) different scenarios:</p> <ul style="list-style-type: none"> - Emergency due to fires at the Concentrator (2021), - Emergency due to fire at Adare Farm (2021), - Response to suspected COVID-19 case at the Unki Complex (2020), and - Failure of the main wall of the TSF (2022). <p>The evidence indicates that the company:</p> <ul style="list-style-type: none"> a. Conducts exercises to test the emergency response plan for a variety of different emergencies, including key participants; and b. Has recently updated the emergency contact information (last updated February 2021). <p>The evidence does not include details to confirm that drills are conducted at least every 12 to 24 months and that the emergency communications contacts are updated at least annually.</p>
2.5.2.1.	<p>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.</p>	⊖	<p>The evidence, Emergency Preparedness and Response Plan (last updated October 2021), and Community Emergency Preparedness and Response Plan Workshop Minutes (February 2021 and March 2022), indicates that risks and community response procedures have been communicated to community stakeholders, and that they participate in emergency drills.</p> <p>The minutes of the Community Emergency Preparedness and Response Plan Workshop (25 February 2021), indicates that five (5) company representatives and 17 community representatives including emergency coordinators from surrounding villages/wards/farms attended the workshop. During the workshop, the committee agreed on emergency preparedness and alarm systems for villages. The company asked the community representatives to list their top unwanted events, how to prevent them and which vulnerable group would be affected.</p> <p>The minutes from the Community Emergency Preparedness and Response Plan Meeting (22 March 2022), indicate that two (2) company representatives and 26</p>

Chapter 2.5—Emergency Preparedness and Response	2022	Basis for rating
		<p>community representatives from surrounding villages/wards/farms attended. The minutes document discussions on ongoing efforts to implement alarm systems in communities, train locals to recognize it and to update the registers of vulnerable people. During the meeting, the attendees also discussed gaps identified during a collaborative fire drill and how to fill those gaps.</p> <p>The evidence indicates that the company solicits input from community stakeholders on emergency preparedness and responses. The evidence did not indicate any proposed changes by the community to the documented EPRP.</p> <p>The evidence includes an emergency drill report (June 2021) that was conducted on-site and involved all personnel.</p> <p>Interviews with stakeholders indicate that they recognize the EPRP and their involvement. Interviews with workers and workers representatives indicate that they were not consulted in the development of the EPRP.</p>

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 28 requirements – total number of IRMA Chapter 2.6 Planning and Financing Reclamation and Closure criteria - 20 requirements – total number Unki surveillance audit criteria; 8 not previously scored (see Section 1.2.1.1) 		
2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence includes the company's Surface Drilling Procedure (first created 2012 and updated in 2021) that was signed off by all relevant people involved in exploration. The procedure establishes that the drilling contractor is the one responsible for rehabilitation of the drill pads and must provide records of the rehabilitation. The company provided as an example of the implementation of its procedure a Drill Site Inspection Report (conducted on November 5, 2021), which includes pictures of the rehabilitated drill pad and drill site rehabilitation checklists (4) completed in 2018, 2019 and 2021.</p>

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
2.6.2.1	<p>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.</p>	<p>Unki mine is an existing mine that began operating between 2008 (mining) and 2010 (processing). The evidence includes:</p> <p>2003 EIA (Ch. 7.2), presenting a brief concept for site decommissioning prior to commencement of mine construction.</p> <p>2018 Unki Mine Reclamation and Closure Plan.</p> <ul style="list-style-type: none"> - 2021 Unki Platinum Mine – Final Rehabilitation, Decommissioning and Mine Closure Plan. Both versions (the 2018 and its update in 2021) indicate compatibility with the protection of human health and the environment and provide information on how affected areas will be returned to a stable, post-mining land use. <p>The evidence does not include an agreed post-mining land use.</p>
2.6.2.2	<p>At a minimum, the reclamation and closure plan shall contain:</p> <ol 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: 	<p>The evidence, Unki Platinum Mine – Final Rehabilitation, Decommissioning and Mine Closure Plan, November 2021, indicates general alignment with this requirement:</p> <ol style="list-style-type: none"> a) Chapter 7 provides the closure vision and objectives. b) Chapters 3 and 4 provide context in terms of site location, environmental conditions and land use. c) Chapter 3 includes a list and brief description of the infrastructure existing at the Unki mine and mining areas. d) Ch 13 identified this requirement as gap. e) Chapter 9 stated the assumed final land use; the final land use has not been agreed upon. f) The closure plan does not have any reference related to geochemistry or potential acid rock drainage. g) The closure plan includes general mitigation concepts to prevent the degradation of water resources. h) The closure plan does not mention waste rock dumps. i) The closure plan considers concurrent reclamation on the slope sides of the TSF (section 5.3.2) j) Topsoil will likely not be available for reclamation (Ch. 13) and currently there is no topsoil stockpiles (Table 3-2). The plan considers that the current storm water diversion channels will remain after closure. The mine footprint is located on flat topography (table 11-1), there stabilization will not be required.

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
<ul style="list-style-type: none"> i. Stabilization and final topography of the reclaimed Mine lands; ii. Storm water runoff/run-on management; iii. Topsoil salvage to the maximum extent practicable; iv. Topsoil storage in a manner that preserves its capability to support plant regeneration; k. Revegetation/Ecological Restoration: <ul style="list-style-type: none"> i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use; ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time; iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed; iv. Measures for control of noxious weeds; v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6); l. Hazardous materials disposal; m. Facility demolition and disposal, if not used for other purposes; n. Long-term maintenance; o. Post-closure monitoring plan; 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. 		<ul style="list-style-type: none"> k) The closure plan includes revegetation, with the goal to return the area to the brachystegia glaucenscens woodland, mixed grassland and acacia-nilotica-combretum hereroense woodland. The closure plan at this stage does not expand to fully comply with this requirement. l) The updated closure plan indicates (November 2021), Section 10.2.5 indicates that waste will be disposed of off-site. The Operation Manual for the Hazardous waste disposal facility (SRK, 2011), does not reflect this update. m) The closure plan considers demolition and disposal if not used for other purposes (Ch. 8 and 1) n) The closure plan considers revegetation maintenance for 3 years. o) Chapter 16 includes a broad concept for the monitoring plan, covering surface water, groundwater, erosion, vegetation, and biomonitoring in the aquatic systems. p) The closure plan does not include at this stage any role for the communities. q) Ch. 12 presents a schedule for the closure plan.

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
<p>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:</p> <ul style="list-style-type: none"> a) Mobilization/demobilization; b) Engineering redesign, procurement, and construction management; c) Earthwork; d) Revegetation/Ecological Restoration; e) Disposal of hazardous materials; f) Facility demolition and disposal; g) Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including: <ul style="list-style-type: none"> i. Interim process water and site management; and ii. Short-term water treatment; h) Post-closure costs for: <ul style="list-style-type: none"> i. Long-term water treatment; and ii. Long-term monitoring and maintenance; i) Indirect Costs: <ul style="list-style-type: none"> i. Mobilization/demobilization; ii. Engineering redesign, procurement and construction management; iii. Contractor overhead and profit; iv. Agency administration; v. Contingency; and j) Either: 		<p>The evidence includes an updated Final Rehabilitation, Decommissioning and Mine Closure Plan (November 2021), indicating that following cost estimations, estimation methodologies, and cost files are considered:</p> <ul style="list-style-type: none"> - 15.2.1 Plant hire costs - 15.2.2 Demolition Costs - 15.2.3 Revegetation rates - 15.2.4 Miscellaneous Rates - 15.3 Estimate liability and - 15.4 Residual liability <p>The Methodology described in Ch. 15.1 complies with this requirement, known as SRCE (standardized reclamation cost estimator). This method uses standardized reclamation calculation methods, data, and procedures to estimate the cost to reclaiming a Mine site as if a third-party contractor is performing the reclamation.</p> <p>The evidence indicates expenses are estimated for: (c) earthwork, (d) revegetation and ecological restoration, (e) disposal and demolition cost, (h), long-term monitoring (excludes long-term water treatment), (j) estimates for end-of-life and (j) financial surety estimates (multi-year or annual), are provided.</p> <p>The evidence does not include costs for (a) mobilization/demobilization, (b) engineering redesign, procurement, and construction management (e) hazardous materials disposal, (g) interim costs prior to actual reclamation, and (i) indirect costs.</p>

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
	<ul style="list-style-type: none"> i. A multi-year inflation increase in the financial surety; or ii. An annual review and update of the financial surety. 	
2.6.2.5.	<p>If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the Mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:</p> <ul style="list-style-type: none"> a) If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and b) Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety. 	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The mine closure plan (2018) indicates that the final mine closure plan shall be discussed with stakeholders starting 10 years prior closure of the mine within the framework of the company's Stakeholder Engagement Plan, and that issues raised by stakeholders related to mine closure are dealt with in the meantime as per the company's systems already in place (Chapter 8). Environmental Committee Meeting Minutes from June 3rd, 2021, with four employees and nine community representatives indicate that the company discussed mine closure objectives and options with some stakeholders (point 5.3). The mine indicated that for each new project a closure plan is developed which is shared with stakeholders and open for stakeholder comments.</p> <p>The evidence does not include details to confirm that the company solicits commentary from a broad range of stakeholders before the finalization of closure plans.</p>
2.6.2.6.	<p>Critical The most recent version of the reclamation and Mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request.</p>	<p>The company published the ESG report for 2021 on its website (https://www.angloamericanplatinum.com/~media/Files/A/Anglo-American-Group/Platinum/report-archive/2021/esg-report-2021.pdf), and the reports include on page 190 Unki mine closure liability estimates and corresponding financial provisions for the year ending 2021.</p> <p>The company's SHE Policy (Unki-MIN-SHE-POL-0001, April 2022) indicates that the company provides SHE (Social, Health, and Environment) information to interested parties upon request. This policy is implemented through the grievance mechanism (Grievance Procedure, 2022 version 10) through which staff, contractors, community</p>

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
		<p>members, organs of state, NGOs, and any other stakeholders can raise issues including information requests.</p> <p>The company maintains a grievance register and an example was reviewed for 2021, ending November 30. The register lists 21 entries, and none of them indicate that information about the closure plan was requested.</p>
2.6.3.2.	<p>Underground Mines shall be backfilled if:</p> <ol style="list-style-type: none"> a) Subsidence is predicted on lands not owned by the mining company; and b) If the mining method allows. 	<p style="text-align: center;">⊗</p> <p>The evidence, Final Rehabilitation, Decommissioning and Mine Closure Plan (2018, Section 5.2 and 10.1.2), indicates that the company has reviewed subsidence risks due to underground failure and plans to conduct a subsidence risk assessment prior to closure. The plan indicates that the preferred risk mitigation measure would be relocation.</p> <p>The plan does not indicate that backfill is considered as a risk mitigation measure for subsidence on lands not owned by the company.</p>
2.6.4.1.	<p>Critical Financial surety instruments shall be in place for Mine closure and post-closure.</p> <p>To assess this requirement, IRMA issued on May 23, 2023, a Memo of Decision: Decision #1: Regarding financial assurance critical requirements:</p> <ul style="list-style-type: none"> • Until further notice (likely after revision of IRMA Standard, unless Assurance Committee revises this current decision), auditors will not score the critical requirement (2.6.4.1, and explanatory 2.6.4.2 and 2.6.4.3) in countries without state-hosted financial surety. Auditors will be required to document why it cannot be applied in the site's country. • Auditors will review and score the other requirements in the chapter that pertain to financial surety, even if those can't be met because of the absence of state-hosted financial surety. • Auditors will daylight in the audit report the lack of state-hosted financial surety and the risk presented by the lack of an 	<p>Not scored. IRMA guidance (Assurance Committee Decision May 23, 2023) provides interim guidance to not score requirements 2.6.4.1, 2.6.4.2, and 2.6.4.3 in jurisdictions where financial surety is not possible due to the lack of government infrastructure.</p> <p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p>

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
	<p>independently managed reclamation and closure bonding process, noting that while this isn't the company's fault, it is still a risk to the environment and impacted communities.</p> <ul style="list-style-type: none"> • Mining companies are encouraged to share with auditors how they are dealing with the issue in the absence of state-hosted system: mining companies can present what the site has in place relative to alternative means of financial assurance or other partial means of surety for reclamation and closure; however, the report will clarify whether auditors have vetted/approved that content or if it has been reviewed by independent financial auditors. 	
2.6.4.2.	<p>Financial surety instruments shall be:</p> <ol style="list-style-type: none"> Independently guaranteed, reliable, and readily liquid; 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; In place before ground disturbance begins; and Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. 	<p>Not scored. IRMA guidance (Assurance Committee Decision May 23, 2023) provides interim guidance to not score requirements 2.6.4.1, 2.6.4.2, and 2.6.4.3 in jurisdictions where financial surety is not possible due to the lack of government infrastructure.</p> <p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p>
2.6.4.3.	<p>Self-bonding or corporate guarantees shall not be used.</p>	<p>Not scored. IRMA guidance (Assurance Committee Decision May 23, 2023) provides interim guidance to not score requirements 2.6.4.1, 2.6.4.2, and 2.6.4.3 in jurisdictions where financial surety is not possible due to the lack of government infrastructure.</p> <p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p>

Chapter 2.6—Planning and Financing Reclamation and Closure		2022	Basis for rating
2.6.4.4.	The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request.	⊗	This requirement was not scored in the initial IRMA audit (2019) published in February 2021.
2.6.4.5.	<p>Prior to the commencement of the construction of the Mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:</p> <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. 	⊗	This requirement was not scored in the initial IRMA audit (2019) published in February 2021.
2.6.4.6.	<p>The terms of the financial surety shall guarantee that the surety is not released until:</p> <ul style="list-style-type: none"> a) Revegetation/ecological restoration and reclamation of Mine and waste sites and 	⊗	This requirement was not scored in the initial IRMA audit (2019) published in February 2021.

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
	<ul style="list-style-type: none"> have been shown to be effective and stable; and b) Public comment has been taken before partial or final surety release. 	
2.6.5.1.	<p>Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all Mine facilities, including, but not limited to:</p> <ul style="list-style-type: none"> c) Inspection of surface (open pits) and underground mine workings; d) Inspection and maintenance of Mine waste facilities including effectiveness of cover and any seepage capture systems; and e) Mechanisms for contingency and response planning and implementation. 	<p>Currently, the mine has no assets which have been closed. The evidence, Closure Plan, Ch. 162, Monitoring, Auditing and Reporting to Track Relinquishment Progress (2021), EMP (2003), Mine Assessment Summary (February 2020), Unki Mine FRDCP Final (SRK, 2018), interviews with several company managers, and closure plans developed by SRK (2011-2019) indicates the company has:</p> <ul style="list-style-type: none"> (a) developed a general framework for closure monitoring of assets such as the TSF, hazardous landfill, underground mine) appropriate at this stage of the mine's operation. The Mine Assessment Summary (February 2021) indicates that the hazardous landfill site is nearly at full capacity and a will require formal closure in the near future (i.e., 2020/21); and (b) considered post-closure monitoring and maintenance of the TSF and including vegetation and water quality monitoring; <p>An update to the Unki mine closure plan was in progress at the time of the surveillance assessment, May – August 2022.</p> <p>The evidence does not include information to confirm the company has fully developed (a) post-closure specifications for inspection, monitoring and maintenance of underground mine workings including closed underground mine workings with an electronic database to store results (data and analyses) aligned to compliance closure criteria, or (c) mechanisms for contingency and response planning and implementation for all assets.</p>
2.6.5.2.	<p>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>The evidence, Closure Plan (Chapter 16.2, 2021), considers surface water and ground water quality monitoring with specified frequency (monthly and quarterly) respectively. The plan does not include monitoring locations or compliance parameters associated with the monitoring.</p>
2.6.6.1.	<p>Long-term water treatment shall not take place unless:</p> <ul style="list-style-type: none"> a) All practicable efforts to implement best practice water and waste management 	<p>Not relevant. The evidence, Closure Plan (2021), indicates that the company does not anticipate the need for long-term water treatment, but will monitor water quality for at least 25 years post-closure to detect potential impacts on groundwater especially from the TSF's seepage. The plan also indicates that the company will continually update</p>

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
	<p>methods to avoid long-term treatment have been made; and</p> <p>b) The operating company funds an engineering and risk assessment that:</p> <ul style="list-style-type: none"> i. Is carried out by an independent third-party; ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods; iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms; iv. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion. 	groundwater models with monitoring data to predict potential impacts on groundwater and surface water (Table 5-2).
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.	— Not relevant since no decision has been taken related to long-term water treatment.
2.6.7.1.	The operating company shall provide sufficient financial surety for all long-term activities, including: Mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be	⊗

Chapter 2.6—Planning and Financing Reclamation and Closure	2022	Basis for rating
	available, irrespective of the operating company's finances at the time of Mine closure or bankruptcy.	
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. 	— Not relevant. No decision has been taken related to long-term water treatment.
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"> c) 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 d) 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). 	⊗

Principle 3: Social Responsibility

RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Chapter 3.1—Fair Labor and Terms of Work	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 37 requirements – total number of IRMA Chapter 3.1 Fair Labor and Terms of Work criteria - 14 requirements – total number Unki surveillance audit criteria; 3 not previously scored (see Section 1.2.1.1) 		
3.1.2.1.	<p>Critical The operating company shall respect the rights of workers to freedom of association and collective bargaining.</p>	<p>The evidence, Liaison Minutes (November and October 2021), indicates cooperation between the workers' committee and the company. Additional evidence includes the New Employee Induction Form - Part B Industrial relations (February 2022), which indicates that the workers' committee structure is presented and explained to new employees. This is supported by emails from the Zimbabwe Diamond Allied Minerals Workers Union (ZDAMWU), indicating the existence of worker's freedom of association (January 2022), current Unki mine workers committee members list (May 2022), and the SHEQ attendance record for Labor rights training (April 2022).</p> <p>Interviews with employees and union representatives indicate that the workers' right to freedom of association and collective bargaining is respected.</p>
3.1.3.1.	<p>The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not</p>	<p>The evidence, Disciplinary Hearing Record of Proceedings (September 2020), Group Inclusion and Diversity Policy (October 2020, pages 3 and 4), indicates the importance within the company to treat colleagues fairly and inclusively. The document, Workplace</p>

Chapter 3.1—Fair Labor and Terms of Work		2022	Basis for rating
	discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements.		<p>Risk Assessment and Control (WRAC) (March 2022), identifies discrimination, forced labor, interference to freedom of association and documents the current controls the company established to minimize these risks.</p> <p>The evidence includes infographics distributed to employees (Human Resources topic for the month, April and May 2022, and e-mail to managers to provide infographic to employees), educating employees on Labor Rights and Forced Labor.</p> <p>A sample of interviewed workers and contractors at the site indicated compliance with this requirement.</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>The evidence, Group Policies on Bullying, Harassment & Victimization (April 2018), Human Rights Policy (October 2021), Group Inclusion and Diversity Policy (October 2018), Disciplinary Hearing and Grievance Handling Procedure (May 2022), and Attendance Registers of employee training on Sexual Harassment Procedures, Bullying, Harassment & Victimization Policies, Human Rights Policy, Grievance Management in the Workplace, and Gender Based Violence (February and March 2022) showing attendance of employees across departments, indicates that the company has taken measures to prevent harassment, intimidation, and/or exploitation, especially in regard to female workers. The evidence includes a sample of investigations and resolutions of reported misconduct (December 2019, September 2020, June 2022) indicating that the company addresses reported issues.</p> <p>Interviews with a sample of employees and contractors, female workers are treated respectfully, felt safe, and without intimidation, exploitation, or harassment in the workplace.</p>
3.1.5.1.	<p>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:</p> <p>a) Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;</p> <p>b) Shall allow for anonymous complaints to be raised and addressed;</p>	☑	<p>The evidence, Disciplinary Hearing and Grievance Procedure (May 2022), the Unki Complex Grievance Procedure (2021), the Grievance Handling, Part B, Employee Code of Conduct (2016), and the Speak Up Policy by Sandvik (April 2016), indicates the company and its contractors have a grievance mechanism for workers to raise workplace concerns aligning with requirements in (a) through (d). The documents include policies, procedures and reporting training and tools to allow for anonymous complaints to be raised (b), addressed promptly (a), allowing workers' representatives to be present (c) (Employee Code of Conduct, page 24), in a manner that does not impede other judicial or administrative remedies (d).</p> <p>Evidence of Grievance Complaint Reporting Training and Tools (documents, videos, posters, App) includes the New Employee HR Induction Form (2022), attendance records of a Grievance Management training (March 2022), and posters and presentations on Anglo American's Your Voice grievance mechanism (no date). The tools and training allow for anonymous complaints to be raised and timely feedback</p>


Chapter 3.1—Fair Labor and Terms of Work		2022	Basis for rating
	<p>c) Shall allow workers' representatives to be present, if requested by the aggrieved worker; and</p> <p>d) Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</p>		<p>provided to those concerned without any retribution. The evidence New Employee HR Induction Form revised Blank (2022), indicates that grievance mechanism is part of the employee's induction. In addition, the evidence (How to Access Engage App, March 2022) indicates that employees have been educated on how to report misconduct through a different channel than email.</p> <p>All employees and contractors interviewed confirmed to be aware of the grievance mechanism, and that all complaints have been addressed promptly.</p>
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.	✓	<p>The evidence, Group Policies on Bullying, Harassment & Victimization (April 2018), Human Rights (October 2021), and Employment Code of Conduct (May 2016), indicates that the company does 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.</p> <p>Interviews with a sample of employees and contractors confirm that applicable policies and procedures are in place and the working environment is safe and that the company has not used corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical, or verbal abuse, coercion, or intimidation.</p>
3.1.7.2.	Critical Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances).	✓	<p>The evidence, interviews with mine workers, managers, and contract employees, onsite observations, and policies and procedures including:</p> <ul style="list-style-type: none"> • Recruitment and Selection Procedure (May 2019) • Responsible Sourcing Standard for Suppliers (2019) • Responsible Sourcing Standard Training (April 2021) <p>It indicates that the company does not hire children under 18, including work where hazardous substances are exposed. Interviews with mine management, employees and contractors confirm prospective workers must present proof of age for verification prior to employment. The Recruitment and Selection Procedure (May 2019) states in Section 9.19 that the minimum age of employment is 18 years as in accordance with Section 11 of the national Labor Act. For suppliers, the Responsible Sourcing Standard (March 2019) is in place. This document indicates that the use of child labor, forced labor and forms of modern slavery would be a material breach that is not tolerated by the company. Evidence of training on this topic to relevant personnel is indicated by a sample training attendance record (Responsible Sourcing Standard Training, April 2021), which includes examples of appropriate hiring practices related to this requirement.</p>



Chapter 3.1—Fair Labor and Terms of Work		2022	Basis for rating
			The evidence, Unki Age Analysis Report (no date), Mine Maintenance Services Age Profile (no date), Trentyre Age Profile (no date), Tesbo Personal Details Register (no date), indicates that the company maintains age records of its own employees and contractors and that there are no employees below the age of 18.
3.1.7.3.	Critical The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher.	✓	<p>Anglo American prohibits the company and its contractors from hiring children under the age of 18. This is supported by interviews, onsite observations, and evidence of age verification and monitoring of contractors. The evidence, Unki Age Analysis Report (no date), Mine Maintenance Services Age Profile (no date), Trentyre Age Profile (no date), Tesbo Personal Details Register (no date), indicates that the company maintains age records of its own employees and contractors and that there are no employees below the age of 18.</p> <p>Employees and contractors participate in workplace training on this topic as indicated by a sample attendance report for training on HR Toolbox Talk - Recruitment and Selection (May 2022).</p>
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.	✓	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, a pre-contractual Due Diligence Report of the security company providing services at the mine (February 2021), a Due Diligence checklist for contractors involved in the Impali Housing Project (Contractors Competency Verification, November 2021), a blank Contractor Competency Verification form (no date), and the company’s Responsible Sourcing Standard for Suppliers (2019), indicates that the company has evaluated its supply chain for risks of child labor and requires all suppliers and contractors, regardless of risk, to adhere to its Responsible Sourcing Standard for Suppliers as a best practice. Section 3.1 requires suppliers to put in place practices to prohibit hiring children under 18. The company monitors suppliers and contractors to determine if children under the age of 18 are being employed. Monitoring evidence includes a completed Contractor Social Management Assurance Assessment for contractor Tsebo (January 2022) and a follow-up assessment of contractors including forced labor and child labor. The assessment, performed by the company, indicates that the contractor complies with internal standards as zero cases of forced labor and employment of persons below 18 were found.</p> <p>The evidence also includes training records (March 2022) indicating that contractors have been trained in the company’s Responsible Sourcing procedure.</p>

Chapter 3.1—Fair Labor and Terms of Work		2022	Basis for rating
3.1.8.1.	Critical The operating company shall not employ forced labor or participate in the trafficking of persons.	✔	<p>The evidence, including the Employees Code of Conduct (May 2016), the Responsible Sourcing Standards for Suppliers (2019) that explicitly prohibits forced or trafficked labor, e-mail communication by the human resources department to all mine employees (HR topic for the month of April and May 2022) on Forced Labour and the company's related procedures, and a sample of Overtime Pre-Authorization forms (June 2022), indicates that the company does not employ forced labor or participates in trafficking and has systems in place to ensure that overtime work is consensual.</p> <p>Interviews with a sample of mine management, employees and contractors confirm that the company does not employ forced labor or participate in the trafficking of persons. To avoid forced labor, the company has developed a procedure related to overtime. Evidence includes the overtime pre-authorization documents from June 2022. This procedure is developed to prevent forced labor and to recognize the increase of workload of the employee.</p>
3.1.8.2.	Where there is a high risk of forced or trafficked labor in the Mine's supply chain, the operating company shall develop and implement procedures to monitor 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>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p> <p>The evidence, Equator Principles Compliance Assessment Report by LSD Partners (December 2020) indicates that the company has evaluated human rights risk and has control systems on forced labor as aligned to IFC Performance Standard 2 - Labor and Human Rights. The company has developed and implemented procedures to monitor its suppliers to determine if forced labor or trafficked workers are being employed (Responsible Sourcing Standards for Suppliers, 2019).</p> <p>The company takes preventative measures to mitigate risks of forced or trafficked labor through employee training and awareness raising campaigns as indicated by Attendance Registers of training on the Responsible Sourcing Standard (April 2021), a sample of emails sent to employees by HR on Forced Labor Communication (April and May 2022), shared topics for each department's toolbox discussion on Overtime Management and a corresponding Meeting Attendance Report (May 2022).</p> <p>Interviews with a sample of contractors and suppliers confirm that this standard is in place and that no cases of forced labor or trafficked workers have been observed.</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>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Lab Payslip and Leave form training attendance record (2021), an infographic on how to understand your pay slips, which are shown on TVs around the site (no date), Understanding Your Payslip Training Material (no date), and interviews with mine workers, managers, and contract employees, indicates that the company pays the legal minimum wage. Minimum payments were agreed between</p>



Chapter 3.1—Fair Labor and Terms of Work		2022	Basis for rating
			<p>the Associated Mine Workers Union of Zimbabwe and the Chamber of Mines of Zimbabwe as indicated by a notice from the National Employment Council for the Mining Industry (February 2022). Unki Mine Wages vs wages agreed to (National Employee Council, February 2022), indicate that the wages during March 2022 exceeded the minimum wage in Zimbabwe. The minimum wage was \$200 and is less than the \$365 paid by the company.</p> <p>Despite this, Union representatives indicated that a recurrent concern is the meetings with the company to request adjustments in wages according to inflation.</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>The evidence, Unki Mine Overtime Procedure (2019), Overtime Audit (April 28, 2022), Collective Bargaining Agreement: Construction Industry (2013), Contractors Social (HR and SP) Minimum Requirements Contractors (no date), Paid Public Holidays-Remuneration Procedure (2019), and MMS Paysheet 1 (January 2022), indicates that overtime hours are paid at a defined rate in accordance with national law and company procedures. The evidence includes a sample of payment made to an employee (Unki Payslips, May 2022) indicating that the company pays overtime.</p> <p>Interviews with a sample of mine workers, managers, and contract employees, indicate overtime hours are paid at a defined rate in accordance with national law and company procedures</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>The evidence, New Employee Induction form (March 2022) and a contractor sample (December 2021), indicate that workers are aware of the wages, overtime, deduction, and bonuses before and at the beginning of their employment at the mine. Similarly, a sample of contractor contracts (January 2022) indicates that contract workers are aware of the wages, overtime, deduction, and bonuses before and at the beginning of their employment for the mine.</p> <p>The specific information used in the inductions for new employees regarding the pay system is explained in the document, Clocking Induction (April 22), which is the material used in training. A sample of induction training attendees indicates that employees are provided with information about wages.</p>
3.1.10.1.	<p>The operating company shall ensure that:</p> <p>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</p>	☑	<p>The evidence includes the Continuous Operation (Contops) Agreement (December 2010) between Unki and the Mine Workers committee, and the Unki Mines Overtime Procedure (2019) and indicates the company ensures:</p> <p>(a) Regular working hours,</p>

Chapter 3.1—Fair Labor and Terms of Work	2022	Basis for rating
<p>hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week;</p> <p>b) Workers are provided with at least 24 consecutive hours off in every 7-day period; and</p> <p>c) Overtime is consensual, and limited to 12 hours a week.</p> <p>d) Exceptions to 3.1.10.1.b and c shall be allowed at Mines in remote locations if:</p> <p>i. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and</p> <p>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.</p>		<p>(b) At least 24 consecutive hours off every 7-days,</p> <p>(c) Overtime is consensual and limited to 12-hours per week, and</p> <p>(d) Sub-requirement d is not relevant, as the mine is not in a remote location.</p> <p>Evidence also includes an example of consensual overtime agreements (Overtime Pre-authorization, May 2022) signed by the employee and its supervisor indicating that overtime is consensual and related procedures implemented.</p> <p>Interviews with stakeholders and union representatives confirm that these agreements are in place and that working hours and shifts are respected.</p>


Chapter 3.2—Occupational Health and Safety	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 23 requirements – total number of IRMA Chapter 3.2 Occupational Health and Safety criteria - 8 requirements – total number Unki surveillance audit criteria; all previously assessed 		
<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>The evidence indicates the company has basic procedures to manage operational risks using the Bowtie methodology, a recognized risk assessment methodology to manage risk in a systematic way. The company employs an onsite physician visiting the operation periodically, and onsite nurses at the clinic. Their duties are to measure baseline health conditions, measure occupational exposure, and conduct fit for duty and health surveillance assessments. Area-specific evidence was provided regarding employee training for these topics including the results of baseline risk assessments,</p>


Chapter 3.2—Occupational Health and Safety		2022	Basis for rating
			workplace risk assessments, job risk assessments, and SLAM (stop, look, assess, manage) risk.
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>The evidence, including records of work fitness and risk assessments and the company's Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, June 2019) and interviews, confirm that fitness of duty applies to all employees, including vulnerable groups. The documental evidence does not outline risks specific to vulnerable or susceptible workers.</p> <p>Interviews with the onsite medical team indicate that vulnerabilities are identified during initial and ongoing health assessments. Interviews with female workers indicate work accommodations and time flexibility is provided as required by National Law.</p>
3.2.2.5.	<p>In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:</p> <ul style="list-style-type: none"> a) Ensure that the Mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment; b) Ensure that the Mine is commissioned, operated, maintained and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons; c) Maintain the stability of the ground in areas to which persons have access in the context of their work; d) If relevant, whenever practicable provide two exits from every underground workplace, each 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; 		<p>The evidence, including site observations, procedures (i.e., vertical shaft management, roof bolting), records (i.e., training, routine maintenance), site observations and interviews, indicate that the company has implemented a comprehensive risk management system to provide for a safe and healthy workplace based upon a sample aligned to (a) – (h):</p> <p>(a) Safety communication (i.e., telephones) were in place and maintained per their maintenance schedule 07.04.2022 to 13.04.2022);</p> <p>(b), (c) Operations followed traditional room and pillar style ore-removal and using standardized procedures (i.e., UNK-MIN-MIN-PRO-0005 Bolter Support Procedure, November 2023, Underground Teams Risk Assessments, April 2022, and Excavations Standard, March 2020);</p> <p>(d) Underground refuge chambers are the first point of emergency provision and then evacuation, with two points of access - decline and vertical shaft.</p> <p>(e) Observations of proper ventilation and equipment undergoing regular maintenance and using standardized procedures (UNK-MIN-MIN-PRO-0065 Vertical Shaft Management Procedure Ventilation of Trackless Development, October 2020);</p> <p>(c, f, g) Interviews with workers verified areas were checked by trained supervisors and calibrated equipment to check for hazards prior to allowing access (i.e., rock instability and air quality monitoring), any worker could stop work in the event there was a potential of harm.</p> <p>(h) Training attendance registers indicating that employees have been trained on the company's Refuge Chamber Procedure and underground escape routes (April 2022).</p> <p>Observations of work practices and infrastructure in place during the site visit, as well as interviews with a sample of employees and contractors indicate the company has</p>

Chapter 3.2—Occupational Health and Safety	2022	Basis for rating
	<ul style="list-style-type: none"> 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>developed procedures and implemented measures to perform work in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons including those identified in (a) – (h)..</p>
3.2.3.4.	<p>The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:</p> <ul style="list-style-type: none"> a) Health and safety hazard identification and assessment; b) Design and implementation of workplace monitoring and worker health surveillance programs; c) Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and d) Development of appropriate assistance and programs to support worker health and safety, including worker mental health. 	<p>The evidence, including Fatigue Management Training Attendance Records (March 2022), MMAC certificates (no date), SHE monitoring plan and SHE Inspections (July 2021), Unki Mine Workplace Health Management Plan (WHMP) 2021 to 2023 undersigned by managers of various departments which aims to identify occupational health risks and improvements and controls to mitigate these risks, and procedure UNK-MIN-SHE-PRO-0008 (no date), indicate that the company has processes in place to enable participation of key staff and the management in topics related to OHS such as health and safety hazard identification and assessment (a) and the design and implementation of workplace monitoring and workers health surveillance programs (b).</p> <p>The evidence includes documentation indicating that the company has programs related to sub-requirements (c) and (d) as follows:</p> <p>(c) The evidence, Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, June 2019), which covers the company's health surveillance strategy to assess employee health and fitness to work in relation to their specific job duties, and a sample workplace risk assessments (Concentrator Heat Stress Survey Report, April 2022, and Smelter Furnace Area Heat Stress Survey Report, Q1 2022), indicates that the company has developed strategies to prevent or mitigate risks to its workers.</p> <p>(d) The evidence, Main SHEQ Meeting Presentation (December 2022), indicates that the company has implemented wellness initiatives and offers mental health counseling, and HIV testing and counseling programs to its workers.</p> <p>While the evidence and interviews with a sample of workers and worker representatives indicates participation by workers through tool box talks and best practices and concerns shared with supervisors, the evidence does not include details to confirm that there is a process in place, such as a joint health and safety committee or similar, that allows workers' representatives or workers to participate in the development and implementation of programs outlined in sub-requirements (c) and (d).</p>

Chapter 3.2—Occupational Health and Safety	2022	Basis for rating
<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>The evidence includes documents to confirm that the operating company has implemented 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 and relevant preventive and protective measures (risk assessments, records from the Unki Mine SMI Board and Medical Emergency and Response procedure) (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 (interviews of a sample of workers, workers rep and supervisors indicate proper PPE is provided to workers at no cost); (c) Providing workers with first aid and prompt access to medical care (interviews with a sample of workers, the clinic nurse, and a tour of the clinic and emergency services onsite indicate care is available 24-hours a day and adequate); (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 (Identification, Selection, Use, Maintenance and Disposal of PPE Procedure) (e) Providing adequate supervision and control on each shift (interviews with a sample of workers, and observations of operational activities in multiple areas including underground, indicate proper supervision and control on each shift). (f) A means to track employees' location underground. <p>The evidence does not include a systematic procedure to inform workers of the health risks and relevant preventive and protective measures.</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> <ul style="list-style-type: none"> a) Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals; 		<p>The evidence, interviews, and site observations, indicates that the company has a dust monitoring program in workplace areas, as well as health surveillance (Code of Practice for Occupational Hygiene on Personal Exposure to Airborne Pollutants, DPM analysis report no E224- Q2 2021 and SKC Lab-SANAS Certificate), developed by competent and accredited professionals, with service contracts validated by government agencies. These instruments are maintained and are ISO 17025:2005 certified. Additionally, the company has implemented a Best Practice code in working areas (a, b, c) and performs routine health check-ups upon new hires.</p>

Chapter 3.2—Occupational Health and Safety	2022	Basis for rating
	<ul style="list-style-type: none"> b) Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests; c) Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory; d) Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and e) If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits. 	<p>The evidence includes an Occupational Hygiene Monitoring Plan for 2022 that outlines the schedule of health assessments of the mine's workforce regarding hazards related to dust, noise, heat, hygiene, ergonomics, and vibration among others. The plan indicates that the mine carries out health surveillance regarding a wide range of potential risks as determined relevant for the different departments (vibration survey only done for underground and surface operators). Additional evidence includes example results for various health assessments including radiation (June 2022), kitchen hygiene (September 2022), and noise (March 2022).</p> <p>The example results of various health assessments do not include detail to verify that sample analysis was done according to ISO/IEC 17025 (c). The evidence does not provide detail on whether exposure limits are derived from or align with national occupational exposure limits (OELs) biological exposure indices (BEIs), or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and that when OEL/BEI is exceeded, the affected worker(s) are informed promptly as in (d) and (e).</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>The evidence, SHE Meeting Presentation Review December 2021 (January 2022), Unki Mine Workplace Health Management Plan (WHMP) 2021 to 2023 (September 2021), SHE Complaints, Learning from Incidents Procedure (UNK-MIN-SHE-PRO-0023, 2022), Unki Health Risk Inventory (2022), and example results for various health assessments including radiation (June 2022), kitchen hygiene (September 2022), and noise (March 2022), indicates that the company keeps 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 in a basic record system (UNK-MIN-SHE-PRO-0011).</p> <p>The evidence does not include:</p> <ul style="list-style-type: none"> • Records of communications (i.e., reports filed) with competent authorities related to workplace injuries, fatalities, accidents, and dangerous occurrences as defined by national laws or regulations. • A document outlining the ability of workers' representatives to access health risk assessments, non-confidential workplace monitoring and health surveillance results, and data on occupational injuries, diseases, accidents, fatalities, and dangerous occurrences.

Chapter 3.2—Occupational Health and Safety		2022	Basis for rating
3.2.6.3.	The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations.		The evidence includes a Communication, Consultation and Participation procedure (UNK-MIN-SHE-PRO-0008, no date) and Learning from Incidents Procedure (UNK-MIN-SHE-PRO-0023, 2022) and indicates that workers are allowed to access their personal information on accidents, dangerous events, inspections, and corrective actions. Interviews with workers and clinic representatives indicate access to health surveillance and medical examinations upon request

Chapter 3.3—Community Health and Safety		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 11 requirements – total number of IRMA Chapter 3.3 Community Health and Safety criteria - 8 requirements – total number Unki surveillance audit criteria; 2 not previously scored (see Section 1.2.1.1) 			
3.3.1.1.	<p>Critical The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ol style="list-style-type: none"> a) General mining operations; b) Operation of Mine-related equipment or vehicles on public roads; c) Operational accidents; 		<p>The evidence includes the Community Health and Safety (CHS) Risk Assessment (August 2021), meeting minutes from the CHS Steering Committee (August 2021), a copy of the SHIRA (May 2022), a strategic overview of the Unki mine (no date), and the 2003 ESIA, and indicates the company has carried out a scoping exercise to identify potential risks and impacts to community health and safety from mining-related activities. The ESIA includes a general scoping exercise to identify the main risks and impacts to communities for requirements (a), and (c) through (i). The CHS Risk assessment and SHIRA list the operation of company vehicles on public roads as a risk (b).</p> <p>Additionally, the company has procedures and guidelines as indicated by the Community Health and Safety Management Plan (UNK-MIN-SP-PRO-0005, May 2022) for managing mining-related risks and impacts on communities.</p>

Chapter 3.3—Community Health and Safety		2022	Basis for rating
	<ul style="list-style-type: none"> 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 Mne 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. 	-	The evidence does not include a detailed assessment of the impacts on priority ecosystems services (see Section 4.6).
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 evidence, Community Health and Safety Management Plan (UNK-MIN-SP-PRO-0005, May 2022), and risk matrixes CHS Risk Assessment (August 2021) and Social and Human Rights Impact and Risk Assessment (no date), indicates that the company has examined risks and impacts that may occur throughout the mine lifecycle.
3.3.1.3.	Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities.	✓	This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Community Health and Safety Management Plan (UNK-MIN-SP-PRO-0005, May 2022), risk matrixes CHS Risk Assessment (August 2021) and Social and Human Rights Impact and Risk Assessment (no date), indicates that the company considers differential impacts on vulnerable groups or susceptible members of the communities, including but not limited to children, elderly, people with underlying conditions, pregnant women and people with disabilities.
3.3.2.1.	The operating company shall carry out an assessment of risks and impacts to:	●	The evidence, the mine's ESIA's (2003, 2008, 2016, 2020), include a basic risk assessment that predicts the nature, magnitude, extent and duration of the potential risks and impacts (a) and the significance of each impact (b).

Chapter 3.3—Community Health and Safety		2022	Basis for rating
	<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 evidence does not include the detail necessary to confirm that the risk assessments are based on sufficiently detailed information to properly assess the associated risks and potential impacts, and does not correlate with the mine waste risk assessment (Chapter 4.1), and risks to human health and safety related to impacts on priority ecosystem (Chapter 4.6).
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 evidence, Community Health and Safety Management Plan (UNK-MIN-SP-PRO-0005, May 2022), indicates that it is the seventh version of the document, first created in 2011 and most recently updated in 2021. The evidence does not include past versions of the management plan to confirm that the company updates it as necessary.
3.3.4.1.	<p>If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:</p> <ul style="list-style-type: none"> a) In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining; b) Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and c) Make information publicly available on its infectious disease mitigation program. 	✔	<p>In Zimbabwe, there is a significant risk of community exposure to HIV/AIDS, and tuberculosis. The evidence, Zvandiri Implementation Plan (2022), communication between the company and an NGO to increase awareness (2022), Sustainable Mining Plan Health and Well-being strategy (December 2021), meeting minutes and attendance register of a Village Health Worker Meeting (August 2021) between the company and local health providers discussing several initiatives to increase awareness of diseases, site observations and interviews with employees and health practitioners, indicates the company has implement policies, business practices, and targeted initiatives for these, including:</p> <ul style="list-style-type: none"> (a) In partnership with public health agencies, workers' organizations, and other relevant stakeholders, created and fund initiatives to educate affected employees and stakeholders (i.e., awareness programs, providing cost-free contraceptives and free tests). (b) Operating in an open and transparent manner sharing best practice for the prevention and treatment of these diseases with workers' organizations. (c) Making information publicly available on the company's infectious disease mitigation program. <p>Site observations and interviews with employees and health practitioners, including local health officials, confirm that these initiatives are in place. The company indicated that it works in collaboration with the national health programs regarding infectious diseases.</p>


Chapter 3.3—Community Health and Safety	2022	Basis for rating
3.3.5.1.	<p>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:</p> <ul style="list-style-type: none"> a) Scoping of community health and safety risks and impacts related to mining; b) Assessment of significant community health and safety risks and impacts related to mining; c) Development of prevention or mitigation strategies; d) Collection of any data needed to inform the health risk and impact assessment process; and e) Design and implementation of community health and safety monitoring programs. 	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, CHS Scoping Meeting with Workers from Local Community 25.02.22, Community Health and Safety Scoping Meeting 25.02.22 Register, signed by the CHSMP, indicate the company collaborates with workers in scoping, assessing, mitigating, and monitoring community health and safety impacts related to mining. Additional evidence indicate that the company has informed key stakeholders of these health and safety impacts, for requirements (a) to (d).</p> <p>The evidence, including interviews with affected community members does not indicate stakeholder involvement in the process of assessing community needs, monitoring relevant health indicators, nor of the design and implementation of community health and safety monitoring program as in (e).</p>
3.3.6.1.	<p>The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.</p>	<p>The evidence includes a sample of meeting of CEF meetings minutes and corresponding CEF meeting attendance registers (September and December 2021), and the TSF Social Risk Disclosure and Community Health Baseline Feedback meeting minutes (February 2021) in which the company discussed potential impacts on community health and safety with stakeholders. This evidence indicates that the company is disclosing information on community health and safety risks and impacts and monitoring to key stakeholders that are part of the CEF meetings and other community meetings (i.e., TSF social risk disclosure).</p> <p>The evidence does not include detail to confirm that this information is publicly accessible (i.e., physically such as in a library or government office, or digitally, such as on the company's websites).</p>

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

This chapter was not assessed as part of the Unki initial or surveillance audit.

Chapter 3.5—Security Arrangements	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 19 requirements – total number of IRMA Chapter 3.5 Security Arrangements criteria - 8 requirements – total number Unki surveillance audit criteria; 2 not previously scored (see Section 1.2.1.1) 		
3.5.1.2.	<p>Critical The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:</p> <ol style="list-style-type: none"> a) Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force; b) If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and c) Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. 	<p>The evidence includes the company's Use of Force Procedure (version 1.0, March 2022) and its Use of Firearms Procedure (version 2.0, March 2022) and indicates that the company's policies require that:</p> <ol style="list-style-type: none"> a) Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force; b) If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and c) Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. <p>Additional evidence, including the Safeguard Contract (2021), an MOU with the Police Department (2022), an Arrest and Detention of a Suspect Procedure (version 7.0, July 2020), and a Mass Arrest and Industrial Actions Management Procedure (version 1.0, July 2020), further indicate the company's commitment to best practices as expressed by the UN Basic Principles on the Use of Force and Firearms.</p> <p>Interviews with a sample of security personnel confirm that policy and procedures related to the use of force and firearms have been implemented, and that these are consistent with best practices.</p>
3.5.1.3.	<p>If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:</p> <ol style="list-style-type: none"> a) Sets out agreed on principles that are consistent with the Voluntary Principles on 	<p>The evidence, Responsible Sourcing Standard for Suppliers (2019) and Safeguard Contract (2021), and Use of Force and Firearms Procedures (March 2022) indicate that the contract between the company and the security provider:</p> <ol style="list-style-type: none"> a) Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the company's procedures on the use of force and firearms;

Chapter 3.5—Security Arrangements	2022	Basis for rating
	<p>Security and Human Rights and the operating company's procedures on the use of force and firearms;</p> <p>b) Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and</p> <p>c) Outlines required training for security personnel.</p>	<p>b) Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and</p> <p>c) Outlines required training for security personnel</p> <p>Additional evidence, including Human Rights Training material (date not specified), and VPSHR training records (2021) indicate that security personnel are trained as required (c).</p>
3.5.2.2.	<p>Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall:</p> <p>a) Follow a credible process/methodology;</p> <p>b) Be carried out and documented by competent professionals; and</p> <p>c) Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice.</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p> <p>The evidence indicates the company conducts assessments scaled to the severity of security risks and impacts including:</p> <p>(a) The evidence, VPSHR Risk Assessment (March 2022) following a credible methodology</p> <p>(b) The use of competent professionals (relevant CVs)</p> <p>(c) Drawing on credible information from a range of perspectives such as women, men, children, vulnerable groups, and experts as indicated by meeting minutes of the CEF committee from December 16, 2021, May 13, 2022, March 24, 2022, and Works Council (March 2022). The minutes for the meetings indicate that the company discussed risks related to mine security, the security arrangements of the mine, and solicited feedback on the suitability and acceptability of the arrangements from stakeholders. Corresponding meeting attendance registers for CEF meetings indicate the attendance of females, males, youth (defined as younger than 35) and elderly people (defined as older than 60). The attendance register of the Works Council meeting indicates the participation of several workers' committee representatives. The evidence indicates that input was solicited from a range of stakeholders.</p>
3.5.2.5.	<p>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</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p> <p>The evidence, Unki Mines Security Arrangement Presentation (March 24, 2022) outlines potential social and human impacts caused by its security arrangement and measures to prevent impacts. CEF meeting minutes (March 24, 2022) indicate that these were presented to community stakeholders, although meeting minutes from December 16, 2021, indicate that these risks were presented to the community already in December 2021. The evidence indicates that the company discussed risks related to mine security,</p>


Chapter 3.5—Security Arrangements	2022	Basis for rating
<p>identified in the assessment, the mitigation strategies shall conform to requirements in IRMA Chapter 1.3.</p>		<p>and the security arrangements of the mine, and solicited feedback on the general suitability and acceptability of the arrangements from stakeholders. Corresponding meeting attendance registers for CEF meetings indicate the attendance of females, males, youth (defined as younger than 35), and elderly people (defined as older than 60). The meeting minutes of a Works Council meeting (March 2022) indicate that workers made suggestions on improving current security arrangements at the site and that these were considered. The attendance register of the Works Council meeting indicates the participation of several of the workers' committee representatives.</p> <p>Interviews with a sample of stakeholders indicate potential conflicts with ASM workers around the perimeter of the operation.</p>
<p>3.5.5.1. The operating company shall:</p> <ul style="list-style-type: none"> a) Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force; b) Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company's policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies; c) Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers; d) Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings; e) Provide medical assistance to all injured persons, including offenders; and f) Ensure the safety of victims and those filing security-related allegations. 		<p>The evidence, Grievance Procedure (version 10, 2022) and Reporting and Investigation of Security Incidents Procedure (no date), Anglo American VPSHR Annual Report (2020), and Protection Services Department Annual Report (2021), and Q4 CEF Meeting (December 16, 2021), describe actions the company takes to meet (a) – (f) of this requirement including programs for investigating and documenting incidents, actions to prevent and deter abusive or unlawful acts, mitigate potential human rights impacts, report security incidents, provide medical assistance, and the safety of victims filing security-related allegations.</p> <p>Interviews with the company managers, security providers, workers, workers' representatives, and community members indicate that security personnel are strictly trained to avoid the use of force in all cases.</p>




Chapter 3.5—Security Arrangements		2022	Basis for rating
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.		Not relevant. The evidence does not indicate that any security-related incident that result in injuries, fatalities or alleged human rights impacts on community members or workers has occurred. The evidence, Anglo-American VPSHR Report (2020), Protection Services Annual Performance Report (2021), Grievance Procedure (version 10, 2022), Reporting and Investigation of Security Incidents Procedure (2021), as well as interviews with a sample of security personnel and stakeholders and government indicates security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers have not occurred in recent memory.
3.5.6.1.	If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms.	✓	The evidence, Q4 CEF Meeting Minutes (December 16, 2021), details the company use of force and firearms as presented to stakeholders. Onsite observations confirmed that security providers do not use firearms.
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.	✓	The evidence includes a sample of meeting minutes of the CEF committee from (September 2020, March and December 2021, March, and May 2022), and Works Council (March 2022) and indicates that the company has informed stakeholders of risks related to mine security, the security arrangements of the mine, and solicited feedback on the suitability and acceptability of the mine's security arrangements from stakeholders at least annually. Interviews with a range of stakeholders, including workers and government, feel adequately informed about the company's security arrangements.

Chapter 3.6—Artisanal and Small-Scale Mining		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 6 requirements – total number of IRMA Chapter 3.6 Artisanal and Small-Scale Mining criteria - 4 requirements – total number Unki surveillance audit criteria; 1 not previously scored (see Section 1.2.1.1) 			

Chapter 3.6—Artisanal and Small-Scale Mining	2022	Basis for rating
3.6.1.1.	<p>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.</p>	<p>The evidence, Artisanal and Small-scale Mining Context Review (February 22, 2022) and Appraisal of Artisanal and Small-Scale Mining - Unki Area of Influence (April 28, 2022), indicate the company has identified ASM entities in close proximity to the mine concession and has carried out a scoping process to understand the legal, social, and environmental context.</p> <p>The evidence further indicates that the area had Chrome and Gold ASM entities until the Unki mine started operating in the area, and that Chrome ASM entities on Unki's property were terminated in 2017. On-site observations confirmed that there are no current gold ASM operations within the mine concession.</p>
3.6.2.1.	<p>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:</p> <ol style="list-style-type: none"> 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); Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning; Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and 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). 	<p>The evidence, meeting minutes from a meeting between the company and one former tribute applicant (July 7, 2020), meeting minutes from a meeting between the company and several ASM stakeholders (Unki Chrome Pits Stakeholder Meeting, October 19, 2021), and a sample of letters from the company addressed to ASM stakeholders (July 2017), indicates that the company complies with this requirement (a) to (c).</p> <p>Observations during the field visit confirmed that sub-requirement (d) is fulfilled by the company's engagement with communities to inform about their grievance mechanism.</p>
3.6.3.2.	<p>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>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Note for the Record - Chrome pits rehabilitation justification (2022), Artisanal Small Scale Chrome Mining in Unki SML - Rehabilitation pictures.pptx (no date), Pit Rehab - Before and after pictures (2022), and Meeting Minutes of a meeting between the company and the communities on the Evaluation of Rehabilitated Chrome and Village 4 Gravel (October 31, 2019), indicates that the</p>

Chapter 3.6—Artisanal and Small-Scale Mining		2022	Basis for rating
			<p>company has considered opportunities to promote positive transformations in the ASM sector and host communities.</p> <p>On-site observations of former ASM operations indicate that the sites have been reclaimed.</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. 	—	<p>Not relevant. The evidence, abstracts from the Mines and Minerals Act (Chapter 21.05, Section 280, and Chapter 20.05), describes the registration process of tribute agreements. The evidence, Chrome Tribute Termination Letters (05.07.17) and Letter from the Ministry of Mine and Mining Development (08.06.21) indicate that the company does not have any commercial/business relationship(s) with an ASM entity.</p>

Chapter 3.7—Cultural Heritage		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 20 requirements – total number of IRMA Chapter 3.7 Cultural Heritage criteria - 10 requirements – total number Unki surveillance audit criteria; 6 not previously scored (see Section 1.2.1.1) 			
3.7.1.1.	<p>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.</p>		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence includes credentials of the people involved in the screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage</p>

Chapter 3.7—Cultural Heritage		2022	Basis for rating
			(Archaeological Impact Assessment Report, October 2010) and indicates that they are competent professionals in Archaeology and Heritage Studies.
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.		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Unki EIA Final Report (September 2003, Section 4.10 to 4.11), provides context on the cultural background and cultural heritage within its area of influence. Additionally, in Section 5 the ESIA indicates that public consultations with interested and affected parties were done to understand the issues that they viewed as important and in need of attention. For example, issues pertaining to water access and resettlement were common. The evidence, Unki Impali Source Housing Project - EIA Report (2008), also indicates that public consultations were part of the scoping process and include the concerns pertaining to cultural and historical significance sites in Section 7 of the EIA.</p> <p>The evidence does not include documentation such as meeting minutes to confirm stakeholder's participation and that the company solicited their input. Interviews with a sample of stakeholders indicate that information is largely shared through oral tradition, that the Chironde Hill holds cultural significance, and that operations and support infrastructure in this area has been avoided.</p>
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.		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. No requests for information regarding cultural heritage topics have been made. The evidence includes the company's procedure on internal and external communication, consultation, participation, and engagement of stakeholders (October 2020), and its Safety, Health, and Environment (SHE) Policy (April 2022), that states that information regarding these topics will be shared with interested parties upon request.</p> <p>The evidence indicates that the company intention is to share information on cultural heritage assessments, management plans and procedures with any interested stakeholder upon request.</p>
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		The evidence, an Archeological Impact Assessment Report (October 2010), indicates that cultural heritage was found within the area where the project intends to build 940 houses for their employees. The sites are categorized into Intangible Heritage, Historical and Archaeological Sites, or Burial Sites, and given significance based on historical, architectural, economic, and educational value. The report indicates that the identification and categorization of cultural heritage was informed by interviews with elders from the local communities. The report documents the assessment of potential

Chapter 3.7—Cultural Heritage	2022	Basis for rating
	<p>consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected.</p>	<p>impacts, proposed mitigation, and monitoring measures to avoid, minimize, restore, or compensate adverse impacts.</p> <p>The evidence, Cultural Heritage Management Plan (no date), indicates that the company will consult with local authorities and communities to identify the importance of cultural heritage and incorporate their feedback into the management plans. The procedure adopts the IFC definition of Cultural Heritage, which are:</p> <ul style="list-style-type: none"> - Tangible moveable or immovable objects; - Unique natural features and; - Certain instances of intangible forms of culture <p>The above three points are generally aligned with requirements 3.7.3, 3.7.4. The evidence, Cultural Heritage Management Plan (no date), indicates that a historic building, burial sites, rock paintings, and iron site smelting were identified a few kilometers away from the mine.</p> <p>The evidence, including interviews, does not include detail to confirm that the mitigation procedures have been implemented.</p>
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"> a) Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it; b) Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it; c) Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and d) Where affected communities are using the tangible cultural heritage for long-standing 	<p>The evidence includes the company's Cultural Heritage Management Plan (no date), which outlines the mitigation hierarchy of potential impacts on tangible replicable cultural heritage. The evidence indicates that the company adopts the mitigation hierarchy from the IFC Performance Standard 8, which favors avoidance and aligns with the sub-requirements (a) through (d).</p> <p>The document indicates that mining-related activities are predicted to have a medium impact on non-critical tangible replicable cultural heritage including a historic building, burial sites, rock paintings, and an iron smelting site and lists impact mitigation measures for each of these that align with the mitigation hierarchy.</p> <p>The evidence, including interviews with company representatives and relevant stakeholders, does not include details to confirm that the company took all reasonable steps to avoid adverse impacts in the area around the mine, including sub requirements (a) to (d).</p>

Chapter 3.7—Cultural Heritage		2022	Basis for rating
	cultural purposes compensate for loss of that tangible cultural heritage.		
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>The evidence includes the credentials of the professionals assigned to develop the cultural and archeological chapters of the EIA (2016) and the Cultural Heritage Management Plan (no date) and indicates that they are competent professionals.</p> <p>The Environmental Impact Assessment (September 2003, page 16) indicates that it has been conducted according to the national legal framework in Zimbabwe (National Museums and Monuments of Zimbabwe Act (Chap 25:11) and Environmental Management Act of Zimbabwe (Chap 20:27).</p> <p>The evidence does not include detail to confirm that the mitigation methodology is internationally accepted. The categorization of cultural heritage in the evidence does not align with categories used by IRMA (replicable, non-replicable and critical cultural heritage).</p>
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.	—	Not relevant. The company does not plan to use Indigenous people's cultural heritage for commercial uses.
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.		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Cultural Heritage Management Plan (no date), and Recovery of Archaeological Artefacts and Evidence Procedure (July 2018), includes the actions and mitigation measures to be implemented to protect cultural heritage. The evidence, Group Social Way Policy (no date), describes the policies on impact/risk prevention and management of cultural heritage.</p> <p>The evidence does not include details to confirm the implementation of the management plan.</p>
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:		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, including Recovery of Archaeological Artefacts and Evidence Procedure (July 2018, point 9 to 9.11), Cultural Heritage Management Plan (no</p>

Chapter 3.7—Cultural Heritage	2022	Basis for rating
	<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 cultural heritage from contractors and visitors; c) Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and d) If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage. 	<p>date), and The Group Social Way Policy (January 2020), indicates the company has procedures for:</p> <ul style="list-style-type: none"> (a) managing chance findings which requires that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made. (b) managing potential impacts to cultural heritage, the preservation of the sites for tourism and their protection by using fences, cleaning, and other measures in accordance with the National Museum and Monuments of Zimbabwe. A stakeholder newsletter, Third Quarter 2017, indicates the company has implemented barriers at one cultural heritage site to reduce potential impacts by visitors. (d) respect the rights, interests, and perspectives of Indigenous Peoples, and considering their unique and special connections to land, water, and other natural resources and when mine activities affect them it will be necessary to follow the IFC Performance Standard 7 on Indigenous Peoples. <p>The evidence does not include detail to confirm alignment with sub-requirement (c).</p>
3.7.7.3.	<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 not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Social Way Induction Training (2022) and an Attendance Register for Social Performance training (May 2022), indicates that relevant employees are trained to recognize cultural heritage sites and company procedures such as the Recovery of Archaeological Artefacts and Evidence Procedure (July 2018) on cultural heritage management including chance finds.</p> <p>The evidence does not include documentation to confirm that all relevant employees, including contractors, have received training in cultural awareness and cultural heritage management.</p>

Principle 4: Environmental Responsibility

RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 28 requirements – total number of IRMA Chapter 4.1 Waste and Materials Management criteria - 21 requirements – total number Unki surveillance audit criteria; 2 not previously scored (see Section 1.2.1.1) 		

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
4.1.1.1.	<p>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>Mine Waste Facilities</p> <p>The evidence, Group Processed Mineral Residue Facilities (MRF) and Water Management Structures (WMSs) policy (10p.) (December 2021) indicates the company's commitment to:</p> <ul style="list-style-type: none"> The protection of public health and safety Responsible management of MRF and WMS toward the Zero Harm objective Allocation of appropriate resources to support MRF and WMSs risk management activities Engaging all relevant participants to implement the risk management system. <p>The Zero Harm objective indicates that the company is aiming to apply the best available practices (BAP) and best available technologies (BAT) to eliminate, avoid, minimize, mitigate, remediate, rehabilitate, and offset the potential impacts and risks associated with the processed MRF and WMSs on people, property, and the environment.</p> <p>Waste Materials</p> <p>The document, Waste Management Standard (WMStd) (last updated November 2021), is a site-level standard and defines the acceptable methods of handling, storing, reusing, recycling and disposal of non-mineral waste. The standard also indicates a commitment to send no waste to a landfill and to establish a sustainable solid waste management program.</p> <p>Interviews with the environmental manager and staff indicate a good understanding of the waste policy and associated responsibilities.</p>
4.1.1.2.	<p>The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:</p> <ol 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; 	<p>Mine Waste Facilities</p> <ol style="list-style-type: none"> (a) The policy, Group Processed Mineral Residue Facilities (MRF) and Water Management Structures (WMSs) policy (10p.) (December 2021), was approved by the Anglo Board on December 8, 2021. (b) The evidence does not include a process to ensure employees understand the policy. However, the organogram for the MRF (AA, no date) defines the responsible person in charge of the TSF, as the competent person (CP), which are the Tailings operator and the Engineer of Record (EoR). The EoR appointment for the period of January 2022 to December 2024 (KP, 2021) with a corresponding purchase order issued by Anglo Platinum on March 22, 2022, for one year, describes the competencies of the EoR. The credentials of the designated EoR for the period

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
	<ul style="list-style-type: none"> c) Having procedures and/or protocols in place to implement the policy; and d) Allocating a sufficient budget to enable the effective implementation of the policy. 	<p>January 2022 to December 2024 indicate that they have the competencies necessary to fulfill their responsibilities. The company appointed a professional EoR, with 33 years of experience in the mining industry and is supported by a deputy EoR, Engineer with 29 years of experience. Four Civil Engineer's support the work of the EoR covering different disciplines.</p> <p>The purchase order issued by Anglo Platinum on June 2022 to operate the TSF and CVs defines the competencies of the Tailings Operator (TO). The TSF is operated by a contractor leading a team of two people, a Site Manager and a SHE Officer. The credentials indicate that they have the competencies necessary to fulfill their responsibilities.</p> <p>For the competencies of the CP, the CP is a Civil Engineer with 30 years of experience in consulting, construction, with the government, and mining. He has been involved with the Unki's TSF since it was commissioned.</p> <p>(c) The Mineral Residue Facilities and Water Management Structures Standard (AA TS 602-001, May 2021), defines the minimum requirements for MRFs, management, water containment, and water diversion structures, throughout the life cycle of the mine. This includes the site selection and early studies, through design, operation, and post-closure stages. Other evidence presented with the technical standard AA TS 602 001:</p> <p>AA TS 602 101 Standard Applicability AA TS 602 102 Classification, Design Criteria, Surveillance Requirements, AA TS 602 103 Required Documents, AA TS 602 104 Surface Flooding Risk Management Plan Development and Implementation.</p> <p>(d) The evidence includes the budget for mine residue facilities (MRF) for the year 2022 with sufficient detail covering the requirements for the Global Industry Standard on Tailings Management (GISTM).</p> <p>Interviews with the competent person indicate awareness of the policy, roles and responsibilities of the team members.</p> <p>Waste Materials</p> <p>(a) The WMStd (see 4.1.1.1) has been approved and signed off by the General Manager of the Unki Complex, and the relevant team members participating.</p> <p>(b) The WMStd has been signed-off by seven staff in key positions at the mine that indicate the competencies and degree of responsibility to conduct their jobs.</p>

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
		<p>(c) WMStd includes the protocols for segregation in nine categories, collection schedule, collection record sheet, and landfill inspection checklist.</p> <p>(d) The budget to cover the incinerator maintenance, landfill consumables, and bioremediation kits for 2022, 2023, and 2024 was provided by the company (SHEQ Budget PBP22_Rev1.xls).</p> <p>Interviews with the environmental manager and other staff indicate an understanding of their responsibilities and the policy.</p> <p>The evidence does not include details to confirm that the company has a process in place to ensure employees understanding of the Mine Waste Facility policy to a degree appropriate to their level of responsibility and function.</p>
4.1.2.1.	<p>The operating company shall:</p> <ol style="list-style-type: none"> a) Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and b) Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. 	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Unki Mine wide Hazardous Chemicals Register (last updated January 2021), includes a register of 34 chemicals identified as Met-034; 51 chemicals identified as Lab-051, 22 chemicals identified as Eng-022; 23 chemicals identified as Min-023, and 25 chemicals identified as Serv-025, and Unki Complex Waste Inventory (2022) includes, paper, rubber, metal, plastic, wood, hydrocarbon, contaminated, biodegradable, biological (clinic), glass, PPE, electronic waste, mineral waste (tailings, slag, waste rock) and other wastes, indicates that the company has (a) identified wastes and other materials with the potential to cause impacts to human health, safety, the environment or communities.</p> <p>Further evidence, WMStd (see 4.1.1.1), Handling and Disposal of Reagents Waste (March 2021), Mine-wide Emergency Response Plan (October 2021, 34p), Community Emergency Preparedness and Response plan (May 2022, 12p), and CEF Meeting Minutes (September 2021) indicate that the company has procedures in place for the safe handling, storage and disposal of those materials, including discussing emergency scenarios regarding chemical spills with community representatives.</p> <p>Interviews with company personnel indicate that procedures are being implemented. Interviews with five workers at the waste sorting facility, who are not employees of the company, but part of a community agreement, and observations of the facility indicate that the company provides these workers with PPE and training. Interviews and on-site observations indicated that procedures for non-hazardous waste management and for hazardous waste incineration are followed.</p>


Chapter 4.1—Waste and Materials Management	2022	Basis for rating
4.1.3.1.	<p>The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, which could lead to impacts on human health, safety, the environment or communities.</p>	<p>The evidence, Workplace Risk Assessment and Control (Baseline WRAC.xls), identifies the TSF (tailings storage facility) as a risk for collapse due to increased surface pressure from the tailings dam. The slag storage facility is also included in this assessment. The Final EIA report for Unki Mine (2003) identifies the TSF as a structure presenting risks of instability and failure (page 18) and describes the design measures to minimize the failure risk.</p> <p>On-site observations confirmed that the location of the MRF is in the same location as indicated by maps provided by the company.</p>
4.1.3.2.	<p>The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:</p> <ul style="list-style-type: none"> a) A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW); b) Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include: <ul style="list-style-type: none"> i. Analysis of petrology, mineralogy, and mineralization; ii. Identification of geochemical test units; iii. Estimation of an appropriate number of samples for each geochemical test unit; and iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit. c) A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility; d) Water balance and chemistry mass balance models for each facility; and 	<p>The evidence indicates the company has characterized the mine waste facilities (TSF, slag storage facility and waste rock/ore stockpiles) for associated chemical risks including:</p> <p>Delta h, 2018: Unki Mine Static Geochemical Test result, 12 p.</p> <p>Delta h, Oct 2018: Unki Mine – Groundwater model, 104p.</p> <p>AA Technical Solutions, 2011-2018: Benchmark mineralogical investigation of the Unki Concentrator (Annual reports, 33p).</p> <p>2021 Mine-wide monthly water balance (.xls)</p> <p>Water Hunters, 2020: Numerical Ground water flow model. Unki Mine. 56p.</p> <p>Scott Wilson, 2003: Final EIA Report for Unki Mine, 127p.</p> <p>University of Zimbabwe, Water, and Environmental Analysis Laboratory; 2018: Results for leachate of various solid wastes, 7p.</p> <p>For sub-requirements (a) to (e):</p> <ul style="list-style-type: none"> (a) The 2003 Final EIA Report does not include climate change projections, and all potential sources of mining impacted water, but all other requirements are included. (b) The Static Geochemical Test result does not include requirements ii, iii, and iv. The report analyzed three separate composite tailing samples from the tailings dam, one composited waste rock sample and evaluated the potential for acid rock drainage and metal leaching. <p>A mineralogical analysis was also conducted. This test classified all samples as non-acid generating, a neutral to alkaline leachate quality is therefore expected for the tailings dam and waste rock dump. The main concern associated with the mine residue is nitrate content due to blasting.</p>


Chapter 4.1—Waste and Materials Management	2022	Basis for rating
	<p>e) Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants.</p>	<p>(c) The Numerical Ground water flow model fulfills this requirement; it assesses the impact of mine residue deposits on the ambient water quality.</p> <p>(d) The TSF’s water balance for 2021 does not include any chemistry mass balance model.</p> <p>(e) For the slag, the available data confirms low risk for acid generation, and low levels of metals in the leachate. The evidence is a report from the University of Zimbabwe (2018) presenting results for leachates of various solid wastes.</p> <p>The water quality data measured at the TSF discharge identifies the contaminants of concern (Delta h, October 2018).</p> <p>Composite tailings and rock/ore stockpile samples were geochemically analyzed; all samples were classified as non-acid generating. The leach tests show that the main constituent of concern associated with mine residue facilities is nitrate (Delta h, October 2018).</p>
4.1.3.3.	<p>The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:</p> <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); 	<p>The following evidence was provided by the company:</p> <p>Knight Piésold, November 2021: Unki TSF CCS rating update. This resulted in GISTM rating of “high” CCS.</p> <p>Knight Piésold, March 2022: Unki Platinum Mine. TSF First quarterly report 2022.</p> <p>Knight Piésold, February 2021: Brittleness study for the Unki TSF Geotechnical Investigations History.</p> <p>Knight Piésold, January 2021: Unki. Mineral Residue Facilities: Geotechnical investigation report.</p> <p>SRK, 2018: Mandatory Code of practice for mine residue facilities. AA - Unki Platinum Mine.</p> <p>KP, 2021: Unki Platinum Mine, Tailings Dam Annual Report. 80p</p> <p>KP, 2020: Unki Platinum Mine, Tailings Dam Annual Report. 90p</p> <p>AA, October 4, 2022: Facility risk identification and mitigation register, 13p; signed off by the people responsible for the TSF’s safety.</p> <p>Water Solutions, September 28, 2022: Mine Water Management, 38 p.</p> <p>KP, September 29, 2022: Study basis for the Unki integrated Dam Breach Study; 16p.</p> <p>KP, February 2022: Unki TSF Quarterly review meeting No. 2022/01, with participation of several other companies and consultants; 8p.</p>

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
<ul style="list-style-type: none"> 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>KP, 2020 & 2021: a sample of Unki TSF quarterly review meetings, including a total of five meeting minutes, indicates the company has identified potential risks.</p> <p>For requirements (a) to (j):</p> <ul style="list-style-type: none"> (a) The reports, KP, 2021: Unki Platinum Mine, Tailings Dam Annual Report (80p) and KP, 2020: Unki Platinum Mine, Tailings Dam Annual Report. (90p) include site investigations, seepage, and stability analysis, and consider the engineering design reports. (b) As indicated in 4.1.6.1 a Technical Review Panel has prepared a 2022 report and has provided recommendations. (c) Updates to potential risks related to the TSF as presented in Knight Piésold, November 2021, by updating in November 2021 the CCS (Consequence Classification of Structures) rating. The purpose of this update was to adapt the CCS rating to the GISTM standard. This update follows the one conducted in February 2021 and the assessment done in 2018. The CCS rating is based on assessing the population at risk, potential loss of life, environmental aspects, health, social and cultural aspects, infrastructure, and economics. (d, e, f, and g) The evaluations have been informed by the design reports, and the short- and long-term placement plans. (g) Quarterly, the EoR (Engineer of Record), prepares a TSF report advising the company on how to operate the plant to keep the TSF in compliance with the TARP (Trigger action response plans). This assessment considers tailings depositions, seepage and drain flows, piezometer monitoring, freeboard levels, rainfall, evaporation, return water, and groundwater monitoring. (h) The evidence, TSF First quarterly report 2022 (Knight Piésold, March 2022) and Tailings Dam Annual Report (KP, 2021), which are inspection reports, indicates that physical risks are identified. The evidence Unki TSF Quarterly review meeting No. 2022/01 (KP, February 2022) and Unki TSF quarterly review meetings (KP, 2020 & 2021) indicate review meetings among the team responsible for the TSF and risks identification. (i) Water balance evidence Mine Water Management (Water Solutions, September 28, 2022, 38 p.) indicates a forecast of the expected tailings and free water inventory in the TSF based on the planned production and TSF raising over a 10-year period from 2022. (j) A dam breach study and waste rock dump runout analyses has been commissioned by the company as shown in the evidence Study basis for the Unki integrated Dam Breach Study (KP, September 29, 2022, 16p.), presenting the study basis to assess a




Chapter 4.1—Waste and Materials Management		2022	Basis for rating
			<p>breach on the TSF, the WRD (waste rock dump) and the PCD (pollution control dam).</p> <p>The evidence does not include dam breach inundation analyses and waste rock dump runoff analyses to assess conformity against sub-requirement (j).</p> <p>Interviews with company staff indicated awareness and understanding of evaluations and inspections conducted to identify physical risks associated with the TSF.</p>
4.1.3.4.	Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.	☑	The evidence, Unki TSF CCS rating update (Knight Piésold, November 2021) and Unki Platinum Mine - TSF First quarterly report 2022 (Knight Piésold, March 2022), indicate that the facility characterization of the TSF has been periodically updated in terms of risks and operability.
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>As mentioned in 4.1.3.2 (c), the model used to predict groundwater quality due to geochemical components of the Unki Mine fulfills this requirement.</p> <p>As mentioned in 4.1.3.3 (i), the TSF water balance does not comply with the requirement. The company is developing the TSF mass balance and water balance predictive model for 2022 and beyond, however it was not available for review during this audit (Water Solutions, August 23, 2022, 2p).</p>
4.1.4.1.	<p>Critical A risk-based approach to mine waste assessment and management shall be implemented that includes:</p> <ul style="list-style-type: none"> a) Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle; b) A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle; c) Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and 	⊖	<p>The company provided evidence to address all the items of this requirements, as follows:</p> <ul style="list-style-type: none"> (a) The chemical risks as reviewed in 4.1.3.2 (e) and physical risks identification reviewed in 4.1.3.3 for the mine life cycle indicate compliance. (b) The company has various levels to assess risks related to the MRF, including quarterly review meetings, quarterly inspections reports, annual inspection reports, and technical review panel reports. To complete this requirement, additional input is required as described in 4.1.3.3 (j). (c) As described above in (b), the risk assessment is updated on a regular basis based on the different actions scheduled by the company. (d) The company has developed a matrix Facility risk identification and mitigation register (last updated October 2022), and the most updated version was reviewed. This risk register compiled the risks identified in the different assessments. The risk register is developed and signed off by the team responsible for the MRF.

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
	d) Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).	The evidence does not include dam breach inundation analyses and waste rock dump runoff analyses to inform the risk evaluation of all potential impacts of mine waste facilities on health, safety, environment, and communities (b).
4.1.4.2.	<p>The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:</p> <ul style="list-style-type: none"> a) Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses; b) Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives; c) Carry out a screening or “fatal flaw” analysis to eliminate alternatives that fail to meet minimum specifications; d) Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative; e) Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and f) Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management). 	<p>The mine’s TSF has been in operation since 2010, and the evidence indicates that the company conducted an alternative assessment for the location of the TSF during the design phase. A brief description of the alternative assessment is presented in the 2003 Unki mine EIA report, in section 3.4 Waste Disposal (p. 18-20). This report refers to an additional detailed report, Scott Wilson, 1998: Addendum EIA report, which was not available.</p> <p>In addition to the TSF, the slag storage facility has also been identified as a mine waste facility. A brief description of the alternatives assessment is presented in the 2016 EIA proposed Unki Smelter report, section 4.2 Slag stockpile facility site alternatives (p. 72). A location ranking matrix is referenced as showing the advantages and disadvantages, but it was not available for review.</p> <p>The evidence does not provide detail to confirm whether the alternatives assessment was informed by criteria and analyses methods outlined in sub-requirements (a) to (f). Interviews with the competent person confirmed that the alternative assessment is conducted and indicates that it is mainly based on technical and financial considerations.</p>
4.1.5.1.	Critical Mine waste facility design and mitigation of identified risks shall be consistent with best	This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence includes the internal group-level standard Mineral Residue Facilities and Water Management Structures Standard (AA TS 602 001 Version

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
<p>available technologies (BAT) and best available/applicable practices (BAP).</p>		<p>5, May 2021, 7p). The evidence, a report on TSF wall raise design and water management optimization Return Water Dam (KP, 2019, 53p), indicates the company is implementing the standard for the design and mitigation of risks at site level.</p> <p>Unki received instructions during August 2021 from the Corporate Office of Anglo American to implement the GISTM (Global Industry Standard on Tailings Management) by 2023 (AA, 2021: Memo - Request Number 1 for Documentation GISTM Implementation Program for 2021). The GISTM is considered by the industry (ICMM - International Council on Mining and Metals) as the best available practice (BAP) and requires the best available technology (BAT) to design and mitigate risks. The Unki TSF CCS rating update (KP, December 2021, 10p) indicates that the Unki mine is utilizing the GISTM in practice. Several requirements of the GISTM were included in the internal standard (AA TS 602 001), such as having an Engineer of Record, a Technical Review panel, and others.</p>
<p>4.1.5.2. Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:</p> <ul style="list-style-type: none"> a) Priority shall be given to source control measures to prevent generation of contaminants; b) Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent or minimize the movement of contaminants to where they can cause harm; and 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>The company has conducted studies on the chemical characteristics of mine waste considering tailings, slag and waste rock and the data does not show any chemical risk from the mine wastes. See response to requirement 4.1.3.2.</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>The evidence, a sample including seven (7) meeting minutes of Unki TSF Quarterly Review Meetings minutes (2020, 2021, and 2022), indicates that the company conducts quarterly meetings in which waste management strategies are reviewed. The meetings are attended by people from the mine (9-13 people), the Engineer of Record (KP), the TSF operator (VE) Anglo Platinum, and consultants, and the meeting minutes indicate representation of interdisciplinary and interdepartmental perspectives that are informed by site-specific characteristics.</p>

Chapter 4.1—Waste and Materials Management	2022	Basis for rating
<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> <ul style="list-style-type: none"> a) An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters; b) A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices; c) A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility; d) Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and e) Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. 		<p>Mineral Waste</p> <p>The company has recently completed the OMS manual for Unki’s TSF (KP, September 2022, 133p), and is currently in draft version, under review and has not been approved for use. The previous TSF operating manual was prepared in 2009 (SRK, June 2009, 110p).</p> <p>The company also has a mandatory code of practice (CoP) for MRF (SRK, Feb. 2018, 270p) which is an update of the 2012 version. This CoP is based on the requirement of hazard identification. The CoP contains a series of procedures, updated during 2013, required to operate the TSF, as follows:</p> <ul style="list-style-type: none"> - Conducting dam inspection by Site Manager. - Calibrating slurry density scale. - Operating the cyclones to obtain efficient separation of coarse and fines tailings. - Recording of rainfall and other data - Creating impoundments for slurry discharge using the day wall method measuring flow rates. - Decanting supernatant water from the dam pool with the barge. - Operating piezometers to determine phreatic pressure. - Conducting piezo upset tests to determine the working conditions. - Installing piezometers to measure phreatic surface inside the dam basin. - Monitoring dust fallout generated at the TSF - Pumping seepage water from the collection sump at the TSF. - Collecting grass seed, planting, and irrigation on the outer slope of the TSF walls. - Emergency Preparedness and Response to taken in the case of an unwanted event. <p>The CoP includes a section related to management of risks related to TSF. But does not include aspects related to the slag storage facility or waste rock dump.</p> <ul style="list-style-type: none"> (a) The OMS Manual in Ch. 7 provides operations procedure, (b) The OMS Manual in Ch. 8 provides inspection, maintenance, and management instructions. (c) The OMS Manual in Ch. 9 provides a surveillance program. (d) The OMS Manual in Ch. 9.11 provides guide- for non-conformance identification.


Chapter 4.1—Waste and Materials Management	2022	Basis for rating
		<p>(e) The CoP includes a trigger action response plan (TARP) for significant responses, site-side responses, engineering evaluation required, post-shutdown responses, and rate of rise responses.</p> <p>Non-mineral waste</p> <p>The company has an Operating Manual for the Hazardous waste disposal facility (SRK, May 2011, 32 p). The company has a policy to minimize waste, the target is zero waste to landfill by 2020 and maintenance beyond 2020.</p> <p>The evidence, Unki 1st Quarter 2022 EMP and Monitoring Report, (AA, 2022, 34p), indicates that the company has taken several actions to achieve this goal: a contract with a waste collection company, bio digesting all food waste, reuse by local community, recovery of reusable waste items, waste incineration, and collecting packaging waste to recycling. By the Q1 of 2022 zero waste was landfilled. The landfill is lined and fenced, and it is in use for non-hazardous waste, with entry restricted, as well as a security guard posted at the gate. All the leachate generated is collected into a pond and allowed to evaporate.</p>
4.1.5.6.	<p>Critical On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> a) Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b) Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c) Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d) Inform the management review to facilitate continual improvement (see 4.1.5.8). 	<p>The evidence, Unki Mine, TSF, Confirmatory letter of EoR appointment (KP, November 2021, 7p), confirms the company has appointed the Engineer of Record (EoR) for the period January 2019 for 3 years, ending end of 2021. The company has extended the appointment of the EoR to cover 2022. The letter of appointment defines the responsibilities of the EoR and complies with this requirement, by establishing a process to regularly evaluate the performance of mine waste facilities.</p> <p>The EoR provides quarterly reports on the TSF (Unki TSF first quarterly report 2022, KP, March 2022, 49p) indicating surveillance details and monitoring records for the quarter and covers physical changes.</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>The evidence, AAP Unki Operation - Mineral Residue Management - Technical Review Panel (TRP) Report No.2 (Rev A, April 2022, 17p), indicates that the Independent Review Body (IRB) is composed of three (3) individuals. The credentials of the three (3) reviewers provided as evidence indicates that they have appropriate and complementing expertise. The AA policy (4.1.1.1) requires the operations to complete TRP as per the AA</p>

Chapter 4.1—Waste and Materials Management		2022	Basis for rating
			standard (AA TS 602 001, see 4.1.1.1). The AA standard in section 4.3 requires each operation to appoint the TRP and describe the responsibilities of the TRP.
4.1.6.5.	The operating company shall develop and implement an action plan in response to commentary, advice or recommendations from an independent review, document a rationale for any advice or recommendations that will not be implemented, and track progress of the plan's implementation. All of this information shall be made available to IRMA auditors.		<p>The evidence, Risk Mitigation Matrix for Unki Mineral Residue Facilities (last updated 2022), includes an action item tracker that the company developed based on the recommendations of the independent review (see 4.1.6.2).</p> <p>The evidence does not include detail to confirm that the company has developed an implementation schedule, assigned a responsible person, and established a budget to implement these actions.</p>
4.1.7.2.	Emergency preparedness plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers' representatives, and in collaboration with first responders and relevant government agencies. (See also IRMA Chapter 2.5).		<p>The following evidence was provided by the Company:</p> <ul style="list-style-type: none"> • AAP, October 2021: Unki Mine-wide Emergency Response Plan, 34 p. • AA, May 2022: Community Emergency Preparedness and Response Plan (CEPRP), 12p. • AA, February 2021: CEPRP Minutes, 8 p. <p>The evidence indicates the CEPRP has been discussed with potentially affected communities. The evidence does not show that emergency preparedness plans have been prepared in consultation with potentially affected communities, workers, or relevant government agencies. The company indicated during the surveillance audit, that they will develop the updated EPRP in collaboration with community stakeholders.</p>
4.1.7.3.	Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. (See also IRMA Chapter 2.5).		<p>The following evidence was provided by the company:</p> <p>AAP, March 2022: Mock drill report, 9p.</p> <p>AAP, September 2019: Emergency Mock Drill – Dam wall failure, 6p.</p> <p>Interviewed stakeholders have knowledge of the existence of a siren to alert in case of an emergency but have not yet participated in an emergency and evacuation drill.</p>
4.1.7.4.	If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring	—	Not relevant. Interviews with stakeholders and the company indicate that there have been no requests from stakeholders regarding mine waste facility management

Chapter 4.1—Waste and Materials Management		2022	Basis for rating
	and surveillance results, independent reviews and the effectiveness of management strategies.		actions, monitoring and surveillance results, independent reviews, and the effectiveness of management strategies. Interviews indicate that waste management is discussed with stakeholders during some of the Environmental Subcommittee meetings.
4.1.8.1.	Critical At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA.	☑	The documentary evidence and onsite observations indicate that the mines' waste materials are not being disposed into any waterbodies, such as rivers, lakes, or seas.

Note: Assessment of the abovementioned IRMA requirements related to the structural stability of mining facilities (TSF, open pit, dams, reservoirs, etc.), should not be considered as a certification of these. A certification's scope is responsibility of authorized technical and governmental organizations, and it is not part of the scope of the IRMA assessment. In the present assessment the auditing team exercised professional judgment, made on the basis of the information available, and the same degree of care and skill ordinarily exercised in similar circumstances by reputable consultants performing comparable services in the same geographic area. Reasonable people may disagree on matters involving professional judgment and, accordingly, provide a difference of opinion on a question of professional judgment.

Chapter 4.2—Water Management		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 20 requirements – total number of IRMA Chapter 4.2 Water Management criteria - 19 requirements – total number Unki surveillance audit criteria; 6 not previously scored (see Section 1.2.1.1) 			
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.	⊕	<p>The ESIA (2003, Section 4.8) includes a summary of the usage of 33 boreholes (including the name of the community which uses each borehole), and a map. The uses of the boreholes are identified as water supply (for irrigation and drinking). The boreholes work with manual pumps. The evidence, Smelter EIA (2016), indicates the Umtebekwana River is an important water source for domestic use, crop irrigation and livestock for surrounding villages. The evidence, Pasimupindu Minutes (2017), describes steps Unki will take to build new water supply boreholes for the community.</p> <p>Interviews with stakeholders and company managers, as well as onsite observations indicate that the communities are using mainly water from boreholes and rainwater</p>

Chapter 4.2—Water Management	2022	Basis for rating
		<p>collection. In addition, some rural water users, including ASM, access surface water for irrigation and other uses.</p> <p>The evidence does not include details to confirm that documentation of existing water rights holders has been updated since the EIA in 2016, that documentation includes non-water rights users, and stakeholders, and that the company engaged with communities in the scoping of water users.</p>
4.2.1.2.		<p>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.</p> <p>The evidence, including: (EIA, 2003), a schedule of water users for the Umtebekwa and Umtebekwana Rivers are presented in the Volume III, this evidence is not available. Hydrological Assessment (2020), a hydrological model used to estimate flows into the Lucilia Poort Dam (LPD) and develop a Rainwater Management Plan for the processing plant. The study presents a current/future use of water at the regional level. EIA for Mine Water Augmentation (Appendix B, 2020), several comments from stakeholders about the LPD project, including interest in sharing the water for irrigation, fishing, and tourism. Location of Future Water Users Meeting No.1 (2019), includes a preliminary list and map of water users to be identified. The evidence does not specify if the users are for groundwater and/or surface water. Pasimupindu Minutes (2017), includes the company's intention to build boreholes to meet future community water supply needs. Scope of Work - Regional Water Resources Assessment (2021), terms of reference for a future project to study regional water resource use including the identification of water uses in collaboration with stakeholders. Indicates that the mine has considered but not yet collaborated with relevant water stakeholders or conducted research to identify current and potential uses of water that may be affected by the mine's water management practices.</p>

Chapter 4.2—Water Management	2022	Basis for rating
4.2.1.3.	<p>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>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Scope of Work - Regional Water Resources Assessment (2021), is a term of reference for a future study to gain additional information about shared water challenges and opportunities at the local and regional level.</p> <p>The evidence, Hydrological Assessment (2020), is a study to develop hydrological models to estimate flows in Lucillia Port Dam (LPD).</p> <p>The evidence, Pasimupindu Minutes (2017), indicates that the purpose of the meeting was to discuss water challenges. Given LPD is not meeting community requirements (of water supply), the company offered to build boreholes for community use.</p> <p>The evidence, Location of Future Water Users Meeting No. 1 (2019), includes a preliminary list and a map of water users. The meeting was held between ZINWA (Zimbabwe National Water Authority) participants and company staff. The minutes indicate the need to identify potential users in the event of a low rainy season and the company's commitment to addressing local water challenges.</p> <p>The evidence, ZINWA Impali Source Dam Meeting (2019), which are meeting minutes between ZINWA and the company, indicates a meeting was held to discuss options to obtain water from other dams, due to the insufficient water supply of LPD.</p> <p>The evidence, EIA Groundwater Augmentation (2020, Chapter 6), describes three potential locations to construct 45 boreholes to obtain water for the mine's processing plant and related stakeholder consultation process. Appendix B contains a log of stakeholder responses; in general terms, the evidence indicates that the project is accepted by stakeholders. Twelve (12) of the proposed 45 boreholes will be for community use.</p> <p>Interviews with sample of stakeholders indicate the company cooperates to identify and address water challenges. According to stakeholders, water can be limited by access to electricity and funding for water system maintenance and repairs.</p>
4.2.2.1.	<p>The operating company shall gather baseline or background data to reliably determine:</p> <ol style="list-style-type: none"> a) The seasonal and temporal variability in: <ol 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 	<p>The evidence includes the Environmental Impact Assessment from 2013, which indicates that it is aligned with the requirements set out in the national legislation, and that the company has:</p> <p>(a) Gathered some baseline and background data on water resources:</p> <ol style="list-style-type: none"> i. Water quality (physical, chemical, and biological conditions): For surface water, nine (9) river monitoring stations were included. Of these, two (2) stations were sampled three (3) times and one (1) station sampled twice. The timeframe between monitoring events was not included. In addition, metals, including mercury, were not analyzed, only sixteen (16) parameters were analyzed, and only one (1) station was analyzed for fecal coliform. For groundwater, ten (10) boreholes were sampled. Each borehole was

Chapter 4.2—Water Management	2022	Basis for rating
	<p>groundwater) that may be affected by the mining project; and</p> <p>b) Sources of contamination and changes in water quantity or quality that are unrelated to the mining project.</p>	<p>sampled only once, with ten (10) parameters analyzed; metals, including mercury, were not included.</p> <p>ii. Water quantity: For surface water, the evidence indicated limited calculations of flows expressed in % along with surface water runoff estimates (in cubic meters). Calculations were estimated for basins (4), and not for specific stations. Measured surface water flows in basins (or catchments) range from 0.006 to 10.34 m³/month, with the highest values from December to April. For the groundwater level, measurements at most boreholes (22/33) indicated that it lies between 1 to 29 meters below ground, and the estimated yield is between 0.96 to 9.3 m³/hour. The measurements were conducted only once and did not capture seasonal fluctuation. In the EIA, 2003, it is stated the groundwater potential for the area is low. The company indicates no pumping wells or springs in the area of influence. The data are inadequate to assess seasonal and temporal variability in water quantity.</p> <p>(b) The evidence (EIA, 2003) indicates commercial farms exist up and downstream of the mine that produce crops such as maize, sorghum, groundnuts, and millet. Gold panning in the area contributes to significant soil erosion. The evidence, Appraisal of Artisanal and Small-Scale Mining-Unki Area of Influence (2022) indicates that the Shurugwi district is a historic chrome and gold mining area, predating mining at the Unki Mine in 2008.</p> <p>The evidence does not indicate that the baseline data collected is comprehensive enough to inform seasonal and temporal variability in water quality, including variances of all relevant contaminants such as metals, including mercury, and fecal coliform.</p>
4.2.2.2.	<p>The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:</p> <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>The evidence, including:</p> <p>EIA (2003) and EIA Groundwater Augmentation (2020), including a scoping process with stakeholders to assess impacts on water quality and quantity, including those from acid mine drainage (from waste rock dump), sewage wastewater, and water use (LPD and pipeline) and assess potential impacts such as diminishing groundwater resources brought on by water use and drought, as well as conflict as a result of water scarcity (i.e., water shortages in Shurugwi and Gweru),</p> <p>Quarterly Environmental Management Plan (EMP) & Monitoring Report (2021), details potential impacts on water resources from mining, mineral processing, the TSF (disposal and effluent), waste rock dump, sewage, and wastewater disposal (although the focus is on water quality, water quantity is also considered),</p> <p>Social and Human Rights Impacts and Risk Analysis (SHIRA) (May 2022), includes the identification and scoping of potential water quality and quantity impacts. The SHIRA</p>

Chapter 4.2—Water Management	2022	Basis for rating
		<p>has been discussed with stakeholders as indicated by meeting minutes of the CEF committee (Q2 2022 CEF Minute, Section 4, May 13, 2022),</p> <p>Minutes of the Water Committee Meeting (June 22, 2022), a new committee established to discuss potential water impacts in greater detail in the coming meetings,</p> <p>The evidence indicates that the company has not yet implemented a formalized process that enables stakeholders to collaborate in identifying potential risks and impacts regarding water quantity and quality.</p> <p>Interviews with communities (August 2022) indicate they are distressed about the TSF discharges (for potential river pollution). At the time of the interviews, the company had not yet fully implemented a mitigation action regarding TSF discharges. However, the company had constructed new boreholes for the communities downstream for the TSF discharges to reduce impacts on water availability.</p>
4.2.2.3.	<p>Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:</p> <ul style="list-style-type: none"> a) Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources; b) Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels); c) If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and d) Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. 	<p>Evidence and observations related to 4.2.2.3. (a)-(d), as described below, indicate the company has commissioned work to address potential current or future significant impacts on water resources (quantity or quality).</p> <ul style="list-style-type: none"> (a) Unki Mine Groundwater Model (2017), includes a conceptual model to estimate the potential for mine-related contamination to affect water resources. (b) Mine-wide Monthly Water Balance (2021), is mainly a log of water consumption for mine operation purposes. The log predicts potential impacts relating to water balance at different conditions (i.e., low, average, high flows/levels). <p>Unki Beach Length and Pool Volume Trigger Action Response Plan (TARP) Graph (August 2021), contains minimum and maximum limits for the TSF which work as a predictive tool, based upon flow estimates. This tool does not estimate or model flow.</p> <p>Numerical Ground Water Flow Model (2020), simulates various scenarios for wellfield implementation and a management plan to ensure sustainable development and usage. The numerical flow model cannot be used to predict impacts.</p> <p>Unki Water Balance Update and Water Management Scenario Analysis (2022), includes in Chapter 4.2 simulations of several scenarios; however, it is not effective to predict impacts.</p> <p>Hydrological Assessment (2020), aims to assess average monthly stream flow into the LPD. The assessment is not a tool to predict impacts on water resources. The evidence does not include numeric water balance model(s) to predict impacts on water resources (ground water and surface water) which might occur at different surface water flow/groundwater level conditions, which also incorporates climate</p>

Chapter 4.2—Water Management	2022	Basis for rating
		<p>change scenarios at high, average, and low flows/levels, and that is revised/updated on a regular basis (i.e., annually).</p> <p>(c) Unki Mine – Groundwater Model (2018, Section 2.5), mentions potential future constituents of concern:</p> <ul style="list-style-type: none"> • TSF (sulphate, nitrate, iron, and manganese). • Landfills (sulphate, nitrate, and phosphate). • Rock/ore stockpile (nitrate, and sulphate). • Pollution control cam (sulphate, nitrate, iron, and phosphate) • Slag stockpile (sulphate). <p>This evidence includes simulations of sulphate and nitrate concentrations around TSF and the process plant for years 2027 and 2045. The analysis does not show potential impacts.</p> <p>The evidence does not include a numerical model to predict impacts on surface water quality with climate change scenarios, run for high, average, and low flows/levels, and revised/updated on a regular basis (i.e., annually or every five years). Water treatment in the mine facility (TSF, effluent discharge, UG water) is in place as mentioned in evidence WMP (2020) and Quarterly EMP & Monitoring Report (2021 – 4th Quarter). The company has not yet evaluated if water treatment is required for the closure phase.</p> <p>The evidence, Final Rehabilitation, Decommissioning and Mine Closure Plan (2021) does not include provisions for ongoing water treatment.</p> <p>The evidence, GISTM Scope of Work High Level Schedule (February 2022), indicates that the implementation of actions to close gaps between the GISTM and current practices are underway and to be completed by the end of 2023. The GISTM scope focuses on the tailings dam facility (includes surface water, hydrogeology, new slag dump, TSF phase 5, others).</p> <p>The documents, Proposal for Consultancy Services for a Surface Water Management Plan Study and Floodline Analysis (2021) and Unki Mine Hydrological and Surface Flooding Study (April 2022), are proposals for a future study and indicate that their results shall further improve performance under 4.2.2.3.</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>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, including studies/tools/models developed, in process or to be developed mentioned above (see 4.2.2.3), are consistent with current industry best practices (i.e., model descriptions, methods, assumptions, uncertainties, sensitivity analyses, recognized consultants, documentations, results). The evidence does not include climate change considerations, and are not run for high, average, and low</p>

Chapter 4.2—Water Management	2022	Basis for rating
		<p>flows/levels, used to predict water quality for both surface and ground waters, and groundwater flow paths.</p> <p>In addition, the studies are not consistently revised and updated to reflect new information (i.e., monitoring data, new projections, operational changes) such as information gained by the Detailed Projections of Future Climate Change over the Bushveld Complex in South Africa and Unki Zimbabwe (2018).</p>
4.2.3.1.	<p>The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine’s water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.</p>	<p>The evidence, including a sample of CEF meeting minutes (2021- 2022), indicates that the company has quarterly meetings with representatives of communities (and local authorities), named Community Engagement Forum (CEF). The CEF meetings have approximately 20-30 participants, in which several topics/issues are discussed. Each meeting lasts about four hours, and for each meeting, the company generates a summary report. If water issues are raised during the meetings, the issues are discussed (including mitigation measures) and there is follow-up during the next meeting, as necessary.</p> <p>Q2 2022 CEF Minutes, Section 4, (May 13, 2022), indicating that Social and Human Rights Impacts and Risk Analysis (SHIRA) were conducted in collaboration with stakeholders to evaluate options to mitigate predicted significant adverse impacts on water quantity and quality.</p> <p>✓ Social Performance Topic for January 2022, indicates that the mitigation hierarchy was followed (control, mitigate, or minimize). A graph showing the application of hierarchical controls and mitigation in risk and impact management is included in the evidence.</p> <p>Additional evidence, including a sample of meeting minutes from meetings with Pasimupindu, Gutsaruzhinji, Adare Farm and Dzikamidzi communities (2022), indicates that the company arranges meetings with specific communities to discuss water concerns and mitigations measures.</p> <p>Interviews with the company and stakeholders, including relevant authorities, are needed during the next full audit to confirm that the company has collaborated with relevant stakeholders in its development of measures to mitigate identified risks to water resources, and that consideration has been given to the mitigation hierarchy during the development of mitigation measures.</p>

Chapter 4.2—Water Management	2022	Basis for rating																																
4.2.3.3.	<p>Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:</p> <ul style="list-style-type: none"> a) Being maintained at baseline or background levels; or b) Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). 	<p>The evidence and selected parameters analyzed (see below: surface water and groundwater subsections), indicate that contaminants measured at point of compliance are maintained at levels protective for the identified uses of those waters.</p> <p>Surface Water:</p> <p>The evidence, Physical & Chemical Analysis Results of Effluent Water Samples (February 2021), includes laboratory results of surface water. The Monitoring Programme Operating Procedures & Adaptive Management Plan (2022) indicates that surface water monitoring stations are: UNK G, UNK F, UNK E [Umtebekwana River], UNK A [LPD], and UNK D [Umtebekwa River]. It is understood that water is used by communities mainly for irrigation. As there is no baseline data (or not confirmed) for these stations, the results were compared against IRMA Agriculture-Irrigations Criteria (for this report). Two stations were selected downstream of the mine for the selected parameters, as follows:</p> <p>UNK D (mg/l):</p> <table border="1" data-bbox="957 740 1421 857"> <thead> <tr> <th>Parameter</th> <th>Monitoring</th> <th>IRMA</th> </tr> </thead> <tbody> <tr> <td>Iron</td> <td>0.028</td> <td>5.0</td> </tr> <tr> <td>Manganese</td> <td>0.011</td> <td>0.2</td> </tr> <tr> <td>Sulphate</td> <td>64.22</td> <td>1,000</td> </tr> </tbody> </table> <p>UNK E (mg/l):</p> <table border="1" data-bbox="957 919 1421 1036"> <thead> <tr> <th>Parameter</th> <th>Monitoring</th> <th>IRMA</th> </tr> </thead> <tbody> <tr> <td>Iron</td> <td>0.018</td> <td>5.0</td> </tr> <tr> <td>Manganese</td> <td>0.008</td> <td>0.2</td> </tr> <tr> <td>Sulphate</td> <td>13.07</td> <td>1,000</td> </tr> </tbody> </table> <p>Groundwater:</p> <p>The evidence, Unki Environmental Monitoring Boreholes Samples (March 2021), indicates water quality results of groundwater. The Monitoring Programme Operating Procedures & Adaptive Management Plan (2022) indicates that there are 24 boreholes for monitoring groundwater quality. It is understood that water is used by communities mainly for irrigation and drinking. As there is no baseline data (or not confirmed) for these stations, the results were compared against IRMA Agriculture-Irrigations and Drinking Criteria (for this report). Two stations were selected downstream of the mine for the selected parameters, as follows:</p> <p>UNK0006 (mg/l): (downstream of TSF)</p> <table border="1" data-bbox="957 1401 1442 1430"> <thead> <tr> <th>Parameter</th> <th>Mon.</th> <th>IRMA-1</th> <th>IRMA-2</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Parameter	Monitoring	IRMA	Iron	0.028	5.0	Manganese	0.011	0.2	Sulphate	64.22	1,000	Parameter	Monitoring	IRMA	Iron	0.018	5.0	Manganese	0.008	0.2	Sulphate	13.07	1,000	Parameter	Mon.	IRMA-1	IRMA-2				
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Chapter 4.2—Water Management	2022	Basis for rating																												
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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 data-bbox="957 784 1885 833">This requirement was not scored in the initial IRMA audit (2019) published in February 2021. Surface Water:</p> <p data-bbox="957 849 1885 979">The mine obtains its water for processing from the Lucillia Port Dam, boreholes, and dewatering of the mine itself. The LPD is located on the west side of the mine on the Dwimbike River, a tributary of the Umtebekwa River. A sample of the Unki mine’s mine-wide Monthly Water Balance (2021), indicates monthly water withdrawal volumes (1,550,968 m³ total annual, and 129,247 m³ monthly average) from the LPD.</p> <p data-bbox="957 995 1885 1157">The evidence, EIA (2003), shows 2.5 million m³ (annual yield). The current annual surface water use is less than indicated in the EIA (2003). The evidence does not include an analysis on whether or how the current consumption is affecting surface water users in the mine’s area of influence, particularly the flow of the Umtebekwa River influencing water availability for downstream users. In addition, the evidence does not include how potential water impacts are shared with potentially affected stakeholders.</p> <p data-bbox="957 1206 1108 1230">Groundwater:</p> <p data-bbox="957 1247 1885 1344">A sample of the Unki Mine mine-wide Monthly Water Balance (2021) indicates that the mine consumed 163,869 m³ from groundwater (boreholes) in 2021. The evidence does not include an analysis on whether or how this water use is affecting groundwater users in the mine’s area of influence.</p> <p data-bbox="957 1360 1885 1442">The evidence, a sample of Unki Mine Borehole Level Recordings Logbooks (2021 and 2022), indicates monthly records of water levels in boreholes. The evidence does not include trends in static water level, corrected for precipitation or pumping, to determine</p>																												

Chapter 4.2—Water Management	2022	Basis for rating														
		<p>changes in water table elevation over time. An example of average water level 2021-2022 (uncorrected) based upon Unki’s logbook, is provided below.</p> <table border="1" data-bbox="957 412 1407 591"> <thead> <tr> <th rowspan="2">Area with Pumping Boreholes</th> <th colspan="2">Levels (mbgl) - Average</th> </tr> <tr> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>LPD</td> <td>19</td> <td>18</td> </tr> <tr> <td>TSF</td> <td>12</td> <td>12</td> </tr> <tr> <td>Chromefields</td> <td>66</td> <td>61</td> </tr> </tbody> </table>	Area with Pumping Boreholes	Levels (mbgl) - Average		2021	2022	LPD	19	18	TSF	12	12	Chromefields	66	61
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4.2.4.1.	<p>Critical (a through e) The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:</p> <ul style="list-style-type: none"> a) Establish a sufficient number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics); b) Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics; c) Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics; d) Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities; e) Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and f) Use accredited laboratories capable of detecting contaminants at levels below the 	<p>(a) The evidence, Unki Monitoring Procedures Adaptive Management Plan (2022), indicates the company has developed a program to monitor changes in water quantity and the physical, chemical, and biological conditions of surface water and groundwater quality. These include: twenty-four (24) boreholes to monitor groundwater; seven (7) surface water stations to monitor effluent, and five (5) stations to monitor surface water (rivers) around the mine. The evidence does not include a surface water monitoring station on the Umtebekwana River upstream of the mine preventing the collection of data to compare with downstream conditions (water quantity and water quality). Other locations are sufficient, and appropriate to demonstrate changes in water characteristics. Below is a snapshot of the monitoring results (Q3-2020, <i>Groundwater</i>):</p>														



Chapter 4.2—Water Management

2022 Basis for rating

values in the IRMA Water Quality Criteria by End-Use Tables.

VARIABLES	UNITS	UNK 001	UNK 002
Colour	TCU	4.30	4.32
Salinity	ppt	0.1	0.1
pH		8.07	8.06
Turbidity	NTU	ND	ND
Conductivity	µS/cm	637	667
TSS	mg/l	9	5
TDS	mg/l	409	403
Alkalinity	mg/l	84	100
Chlorides	mg/l	7.09	21.27
Sulphates	mg/l	19.94	114.95
B.O.D	mg/l	9.8	11.8
C.O.D	mg/l	277	185
D.O.	mg/l	5.65	5.64
Nitrates	mg/l	0.002	0.039
Total nitrogen	mg/l	0.003	0.045
Reactive phosphates	mg/l	0.013	ND
Total phosphorus	mg/l	0.024	0.001

- (b) The evidence, Water Management Plan (2020) and Surface and Groundwater Quality Monitoring Schedule (2022), indicates that water is monitored on a quarterly basis. Sample records indicate this frequency is inconsistent. For example, borehole UNK006 was sampled in Q1-2021 and not sampled in Q3-2021 and Q1-2022. The evidence indicated the number and location of sampled boreholes varied by quarter. For example, in Q1-2021 (6) boreholes were sampled, in Q3-2021 (9) boreholes were sampled and in Q1-2022 (13) boreholes were sampled.
- (c) The evidence, Unki Monitoring Procedures Adaptive Management Plan (Chapter 8, 2022), indicates that the company has developed a Trigger Response Action Plan which establishes water quality parameters and concentration action levels. Four scenarios- green, yellow, orange, and red - provide an early warning of negative changes. The evidence does not include trigger levels and actions to provide early warning of negative changes on water quantity such as groundwater or surface water in the Umtebekwa River.
- (d) Not Relevant: The company indicated that process water is not reused by non-mining entities. Wastewater is only discharged if emergency conditions exist as allowed under their TSF permit. The evidence, Unki Monitoring Procedures Adaptive Management (Section 4, 2022), indicates water is reused by the mine.
- (e) The evidence, Groundwater, and Surface Water Monitoring Procedure (2019), describes a methodology for monitoring. However it is focused on water quality, it

Chapter 4.2—Water Management		2022	Basis for rating
			<p>does not include water quantity (surface and groundwater). The evidence, Water Management Plan (Chapter 8, 2020), indicates that the samples are sent to third party laboratories on a quarterly basis.</p> <p>(f) Not included in this assessment.</p>
4.2.4.2.	<p>Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis.</p>		<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Unki Mine – Groundwater Model (Section 3.3.2, Table 3.3, 2017), mentions that six (6) parameters have a reasonable potential to adversely affect water, including sulphate, nitrate, iron, manganese, phosphate, and chloride.</p> <p>The evidence, a sample of Unki Mine Water Monitoring Quarterly Reports (surface, groundwater, effluents - water quality laboratory results) (2021-2022), indicates 39 total analyzed parameters, including the six (6) parameters of concern.</p>
4.2.4.3.	<p>The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:</p> <ol style="list-style-type: none"> a) Participation may involve the use of independent experts selected by the community; and b) If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed. 		<p>The 1st Quarter CEF (Community Engagement Forum) Meeting (March 2021), mentions that an environmental subcommittee will be created whose members will be involved in participatory monitoring (air and water quality). Training was scheduled for the subcommittee for Q2 2021.</p> <p>The Community Environmental Committee (CEC): Terms of Reference (June 2021), indicates that the CEC will be involved in environmental monitoring participation. Nominated members of the community including representation by potentially impacted communities (i.e., impacts related to access and use of air and water resources among other natural resources). There are (7) communities involved: Gutsaruzhinji, Adare, Makwikwi, Impali, Village 17, Ward 19, and Chironde (no other communities are mentioned).</p> <p>Other evidence of community monitoring included community water sampling training (SHEQ Training Records: 11.02.21 and 20.10.21) and two photos in which community members participated in water sampling.</p> <p>The evidence, CEF Meeting Minutes (Page 4, and 6 to 8, December 16th, 2021), indicates that community representatives were involved in water quality monitoring for Q4 2021. This same evidence also indicates that the water quality sampling results are shared with community members present at the meeting.</p>

Chapter 4.2—Water Management	2022	Basis for rating
		<p>The meeting minutes with Gusaruzhinji, Adare Farm and Dzikamidzi communities (Page 10, February 15th, 2022), mentions that communities take the water samples together with the mine.</p> <p>The evidence does not include detail to determine whether stakeholders have requested the participation of independent experts and if there are systems in place through which the community can request financial assistance for monitoring campaigns and provide feedback.</p> <p>Interviews with stakeholders are needed during the next full audit to confirm that the company has actively tried to engage community stakeholders to participate in water monitoring and providing feedback on the monitoring program, and that the company provided the necessary means to facilitate participation, if requested.</p>
4.2.4.4.	<p>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>(a) The WMP (Water Management Plan) (2020), outlines planned actions to mitigate predicted impacts to current and future uses of water and water-dependent natural resources. The evidence includes an efficiency strategy for water management given that water security is a key risk for the area. The efficiency strategy contains best practices including reduced water consumption from the LPD, increased water uses from the TSF, retaining stormwater for reuse, and augmenting existing water resources through exploration of new groundwater reserves. The evidence does not include mitigation in the event of decreased water quantity such as reduction in natural flow of the river from LPD operation; a lowering of the water table (groundwater quantity/levels in boreholes) in communities from dewatering/water use or remedial actions in the event of uncontrolled discharges to surface water or groundwater.</p> <p>The Quarterly Environmental Management Plan (EMP) & Monitoring Report (Q4, 2021), which is submitted to the Environmental Management Agency, includes mitigation actions for water resource conservation such as recycling water discharged as effluent or as tailings are reusing it for processing. The recycling of water from tailings will be made possible by a Return Water Dam planned to be constructed close to TSF. The return water dam will provide settling prior to discharge back to the plant. Finally, water efficiencies in the EMP & Monitoring Report include capturing storm water runoff from surface areas at the facility and routing it back to the plant. These areas include the Waste Rock Dump, sewage treatment ponds, and the mineral processing plant's Pollution Control Dam (PCD). The PCD is currently being upgraded to prevent potential runoff of surface contaminants to the Umtebekwana River.</p> <p>The Water Operating Framework and Recommended Implementing Procedure (April 2022) specifies adaptive management actions that will occur if certain</p>

Chapter 4.2—Water Management		2022	Basis for rating
			<p>impacts, indicators, thresholds, or trigger levels are reached. The information is summarized in Chapter 4.2. and supported by a detailed table listing: site specific documentation, site-specific actions taken, and site-specific actions to be taken.</p> <p>(b) The Monitoring Programme Operating Procedure and Adaptive Management Plan (Chapter 8, Table 3-1, July 2022), shows the Trigger Response Action Plan, describing four (4) possible scenarios (green, yellow, orange, and red). For each scenario water quality limits for the analyzed parameters, and the actions to be taken are listed.</p> <p>The evidence does not: include a timeline for the completion of the actions, or thresholds and actions for water quantity, surface, and groundwater, considering potential impacts on users/uses in the communities.</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>The Quarterly Environmental Management Plan [EMP] & Monitoring Report (2021), which is submitted to the Environmental Management Agency, includes detailed mitigation/control actions taken for water resources. The report is prepared quarterly, and the effectiveness of adaptive management actions is reviewed and evaluated frequently.</p> <p>The Monitoring Programme Operating Procedure and Adaptive Management Plan (Chapter 9, July 2022) indicates an annual review/update.</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>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The Monitoring Program Operating Procedure and Adaptive Management Plan (Chapter 9, July 2022), indicates that relevant internal and external stakeholders are to be consulted during the annual review and updating process. The evidence, a sample of screenshots of a Whatsapp communication between the company and stakeholders from Ward 19 (July 2022), indicates that the company plans to discuss and review the CEF Water Adaptive Management Plan with communities during the third quarter CEF meeting, scheduled for September 2022.</p> <p>The evidence does not include documentation to confirm that stakeholders have had the opportunity to participate in the review and revision of the adaptive management plan as indicated in the evidence.</p>
4.2.5.1.	The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published	⊕	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The Quarterly Environmental Management Plan & Monitoring Report (Q1 2021), which is submitted quarterly to the Environmental Management Agency</p>

Chapter 4.2—Water Management	2022	Basis for rating
	<p>annually, or at a frequency agreed by stakeholders from affected communities:</p> <ul style="list-style-type: none"> a) Monitoring data for surface water and groundwater points of compliance; and b) Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations. 	<p>(EMA) of Zimbabwe, indicates (in Chapter 9 – Section 3) that surface water and groundwater quality results are included in the report.</p> <p>The Q4 Quarterly CEF Meeting Minutes (December 16th, 2021) indicates on pages 6-8 that surface and groundwater quality monitoring results (in a summarized format) are shared during the CEF meetings.</p> <p>A sample of CEC Meetings Minutes (March 22, and June 8, 2022) indicates on page 5, and pages 11-12 that potable and surface water quality monitoring results are shared during the CEC meetings (in a summarized format). Groundwater quality is not included.</p> <p>The evidence does not indicate that stakeholders are aware of the water information, and water quantity results are not included (river flows, pumping rates, levels in boreholes, etc.).</p> <p>Additionally, there is no evidence to indicate that water resources monitoring information, current and baseline, are accessible to stakeholders on a website.</p>
4.2.5.2.	<p>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>The evidence indicates that procedures to rapidly communicate water risks posing an imminent threat to stakeholders have been developed and tested. These include:</p> <ul style="list-style-type: none"> • TSF Social Risk Disclosure and Community Health Baseline Feedback Meeting (February 2021) summarizes the meeting between mine staff and community members. Section 2 describes the disclosure of information on TSF, explaining that the mine releases water through settling ponds, but if heavy rains continue, the mine will consider decanting the excess water through the emergency spillway. • Mock Drill Report (March 2022) describes a simulated situation of a TSF emergency, where analysis demonstrates that there is rapid communication with relevant stakeholders. (local communities and authorities). The report also establishes areas of improvement (i.e., some of the Gutsaruzhinjji village members responded to the sounding gong 15 minutes later even though they stay close to the assembly appoint). • Mine-wide Emergency Response Plan (2021), including: <ul style="list-style-type: none"> Section 6: Tailings Dam Wall Failure/Overflow. Community action – notify downstream communities of evacuation via the local council or/village heads and District Civil Protection Unit to be conducted by the Social Performance Manager. Section 8: Surface Flooding. Same actions as above bullet. Section 15: LPD Wall Failure or Overflow. It is mentioned that the stakeholders' warnings will be performed by Social Performance personnel.

Chapter 4.2—Water Management	2022	Basis for rating
		<p>Section 17: Water Supply Failure & Contamination. Relevant actions mentioned are a) Notify relevant government stakeholders, b) Mine Emergency Coordinator to trigger notification to downstream communities via the Services Protection (SP) Manager, c) SP Manager to notify the District Development Coordinator (DDC) and Ward Counsellor to advise community to stop use of consumption. There is no indication of what water supplies are included.</p> <p>Section 19: Spillage of Effluent from TSF/PCD. Environmental Coordinator and Social Performance warns communities susceptible to pollution.</p>
4.2.5.3.	<p>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>The evidence, including:</p> <p>The Monitoring Program Operating Procedure and Adaptive Management Plan (Chapter 9, July 2022) that stipulates that relevant internal and external stakeholders must be consulted during the annual review and updating process.</p> <p>A sample of screenshots of a Whatsapp communication between the company and stakeholders from Ward 19 (July 2022), indicates communication with communities, referencing that the company will share the plan for input and review, during the Third Quarter CEF meeting, scheduled for September 2022.</p> <p>CEF Meeting (September 22, 2022), the planned agenda for the next quarterly meeting that indicates that the Draft Water Adaptive Management Plan is included.</p> <p>Launch of Unki Community Health Program (April 2022) that describes several company initiatives related to water recycling, reuse, alignment with national health strategy which includes water topics, water safety planning/implementation, water safety risks and impacts management, training and establish water safety committees. The evidence indicates (61) stakeholders participated in the meeting. The information does not include evidence of discussions about water.</p> <p>Water Committee Meeting Minutes (July 22, 2022), which are the minutes of the second meeting of the committee, indicates the attendance of members from the mine and communities. However, it does not describe any discussions about water. The main topics discussed were mainly the committee's terms of reference, allocation to villages, elections, and fuel reimbursement.</p>

Chapter 4.3—Air Quality	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 12 requirements – total number of IRMA Chapter 4.3 Air Quality criteria - 6 requirements – total number Unki surveillance audit criteria; all items previously scored (see Section 1.2.1.1), which does not consider those excluded during IRMA launch (4.3.4.1, 4.3.4.2, and 4.3.4.3) 		
4.3.1.1.	<p>The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations.</p>	<p>The evidence provided by the company includes:</p> <ul style="list-style-type: none"> • Air Quality Management Plan (Airshed Planning Professionals, 2021: 67p) (AQMP) • Air Quality monitoring procedure (AA, 2019; 7p) (AQMPPro) • Air Quality Unki Mine Survey Report (Toltecs PVT Limited, 2021: 19p) (AQSR) • Capability Statement (Toltecs PVT Limited, 2021: 12p) (CAPSTAT) • SHEQ Attendance Record (Anglo American, 2022, 4p) <p>The AQMP (page 12) indicates that the company has carried out a detailed evaluation exercise to determine the activities that generate possible significant impacts on air quality, considering:</p> <ul style="list-style-type: none"> Emissions inventory Sensitive receptors Vehicle routes Contaminant dispersion modeling Comparison with air quality guides <p>Ambient:</p> <p>The AQMP (page 24) identifies significant impacts related to the concentration of PM10 with values that exceed the guideline value of 50ug/m³.</p> <p>No significant impacts related to dust and PM2.5 are detected, identifying values below the guideline value of 1200mg/(m²*day) and 25 ug/m³ respectively (AQMP, p24-26)</p> <p>Emissions:</p> <p>The company has identified the main sources that contribute to the air quality impacts, for the parameters: TSP, PM₁₀, PM2.5, SO₂, NO_x and CO. (AQMP, p36-38) and (AQSR, p18)</p> <p>There is no evidence to confirm that the following parameters established by IRMA have been considered:</p> <ul style="list-style-type: none"> Lead (Pb) Benzene Ozone


Chapter 4.3—Air Quality		2022	Basis for rating
			<p>Arsenic (Ace) Cadmium (Cd) Nickel (Ni) Polycyclic Aromatic Hydrocarbons</p>
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.	✓	<p>The evidence, AQMP (see 4.3.1.1.) (page 24), identifies significant impacts related to the concentration of PM10 with values that exceed the guideline value of 50ug/m³. No significant impacts related to dust and PM2.5 are detected, identifying values below the guideline value of 1200mg/(m²*day) and 25 ug/m³ respectively (AQMP, p24-26) The company has determined the significant impacts to air quality related to its activities (see, 4.3.1.1).</p>
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>The AQMP (p13 – see 4.3.1.1) indicates that the company uses air quality models and monitoring, determining concentration, transport, and dispersion with adequate methodologies. In the Methodological Overview section of the AQMP (p13) it is indicated that the AEROMOD (US. EPA) dispersion model was applied to predict concentrations for the pollutants (TSP, PM₁₀, PM2.5, SO₂, NO₂ and CO). Monitoring is carried out by Toltecs Pvt Limited. The CAPSTAT (p2-12) describes the methodology and equipment used by Toltecs and the personnel conducting the monitoring has been trained.</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>The evidence, AQMP (see 4.3.1.1.), establishes as main objectives to: Prevent or reduce emissions of interest Reduce dust emissions through wet suppression Eliminate dust at its source Minimize gaseous emissions Monitoring of management practices to ensure that mitigation measures are effective.</p>
4.3.3.1.	The operating company shall monitor and document ambient air quality and dust	✓	The AQMP and AQSR (see 4.3.1.1) indicates that an air and dust quality monitoring plan is maintained and executed.

Chapter 4.3—Air Quality		2022	Basis for rating
	associated with the mining project by using personnel trained in air quality monitoring.		The CAPSTAT (p2-12 – see 4.3.1.1) includes evidence indicating that the personnel involved in air quality monitoring is adequately trained. Additionally, the SHEQ Attendance Record (p4 – see 4.3.1.1) indicates that Unki mine personnel has participated in the air quality monitoring training in March 2022. This document is dated and signed by each participant.
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.	☑	The AQMP and AQMPro (see 4.3.1.1) indicate the evaluation in the selection of sampling points (9), identified with specific coordinates, considering sensitive receptors consistent with the modeling of contaminant dispersion.

Chapter 4.4—Noise and Vibration		2022	Basis for rating
IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.			
<ul style="list-style-type: none"> - 10 requirements – total number of IRMA Chapter 4.4 Noise and Vibration criteria - 5 requirements – total number Unki surveillance audit criteria; all previously considered 'not relevant' 			
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 evidence provided by the company includes: <ul style="list-style-type: none"> - Scott Wilson Resources Consultants, 2003: Final EIA Report for Unki Mine, Volume I. 127p. (2003 EIA) - Ascon Africa; 2016: EIA Proposed Unki Smelter; 239p. (2016 EIA)

Chapter 4.4—Noise and Vibration		2022	Basis for rating
	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.		<ul style="list-style-type: none"> - Assessment of UNKI Activities Impact on Community – Noise Survey report, Anglo American, 2022, p.5. (NSR) - Social Incidents and Grievance Register and Analysis, Anglo American (2021), p.5 (Social Register) <p>The 2003 EIA and 2016 EIA identify the sources and potential receivers of noise and vibrations as:</p> <p>Receivers:</p> <ul style="list-style-type: none"> Communities Workers Wildlife <p>Sources:</p> <ul style="list-style-type: none"> Construction phase Team mobilization and operation Earth movements Underground blasting Ore processing <p>The NSR indicates that there are no significant impacts related to noise and there is no 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>The evidence does not include quantifiable measurements of vibration. Note that noise and vibration-related impacts (i.e., from blasting or equipment operation) were not observed at the time of the site visit outside of operational areas.</p>
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.	✔	The NSR (see 4.4.1.1) indicates that the company has determined the noise levels related to mining activities at six (6) stations without traffic and four (4) stations with traffic. The evidence indicates that none of the evaluated stations exceeds the recommended limits (70 decibels).
4.4.2.6.	If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the operating company shall consult with affected stakeholders to develop mitigation	—	Not relevant. The Social Register (p.5) indicates that the company has not received complaints related to noise and vibrations related to its activities.

Chapter 4.4—Noise and Vibration		2022	Basis for rating
	strategies or other proposed actions to resolve the complaint. Where complaints are not resolved then other options, including noise monitoring and the implementation of additional mitigation measures, shall be considered.		
4.4.2.7.	All noise- and vibration-related complaints and their outcomes shall be documented.	—	There is no 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.
4.4.3.1.	When stakeholders make a noise-related complaint, the operating company shall provide relevant noise data and information to them. Otherwise, noise data and information shall be made available to stakeholders upon request.	—	There is no 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.

Chapter 4.5—Greenhouse Gas Emissions		2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 7 requirements – total number of IRMA Chapter 4.5 Greenhouse Gas Emissions criteria. - 6 requirements – total number Unki surveillance audit criteria; all previously assessed. 			
4.5.1.1.	<p>Critical The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:</p> <ol style="list-style-type: none"> a) Identifying and measuring greenhouse gas emissions from the mining project; b) Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project; 		<p>The evidence for this chapter includes:</p> <ul style="list-style-type: none"> • Anglo American, 2021: Group Climate change Policy, 8p. (Climate change policy) • Anglo American, 2022; Unki Energy Road Map, 18p. (Energy Road Map) • Anglo American, 2011: Environmental, Social and Governance Report; 216p (ESGR) • Anglo American: UNKI Complex Energy and GHG Calculations (E&GHG Calculations) • Anglo American: Fortnightly Engagement Tracker (Engagement tracker) <p>The climate change policy indicates that the company has established principles to face climate change by:</p>

Chapter 4.5—Greenhouse Gas Emissions		2022	Basis for rating
	<p>c) Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and</p> <p>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.</p>		<p>Building internal agility and ensuring resilience to climate change.</p> <p>Driving energy and carbon savings throughout their business.</p> <p>Understanding and responding to the carbon life-cycle risks and opportunities for their products.</p> <p>Developing and implementing collaborative solutions with their stakeholders.</p> <p>Contributing skills and knowledge to the development of a responsible public policy.</p> <p>The Energy Road Map and the ESGR indicate that the company:</p> <ol style="list-style-type: none"> Identifies and measures GHG from the Unki mine and defines a reduction target (Energy Road Map; page 3 - 11). Presents indicators and objectives for energy efficiency and reduction of GHG in its activities (ESGR, p. 59). The ESGR (p 16) outlines achievable company-wide targets for reductions in absolute greenhouse gases (reduction of 30% by 2030) The Climate change policy indicates that it shall be reviewed every three years.
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.	☑	<p>In the ESGR (p 63) the company refers to the methodology used for the emissions inventory, indicating that it was published in 2019:</p> <p>www.angloamerican.com/scope-3-methodology-report</p> <p>The Scope 3 emissions calculation methodology report (AA, 2020, 28p.) indicates that the company has used the methodology according to the GHG protocol for the quantification of emissions, which is a widely accepted reporting standard.</p>
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.	☑	<p>The ESGR indicates that the company details actions in accordance with the GHG policy with actions such as taking initiatives to reduce energy intensity, implement renewable energy projects, and adopt fuel cell technology to replace diesel consumption in trucks. These actions are established according to the GHG Protocol corporate standard which is part of ESGR (p 59).</p>
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.	☑	<p>The evidence, E&GHG Calculations (see 4.5.1.1), indicates that the company has started recording GHG with data from January 2021 to March 2022 and has set greenhouse gas reduction targets.</p>

Chapter 4.5—Greenhouse Gas Emissions		2022	Basis for rating
			The ESGR (p 60) indicates a company-wide reduction of GHG emissions between 2020 and 2021. The Energy Road Map (p 3) indicates that the Unki site achieved lower site wide GHG emissions than targeted for 2021.
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.	☑	<p>The ESGR (see 4.5.1.1) indicates that the company has researched and documented the development of technologies that use hydrogen in fuel-cell electric vehicles (FCEVs) and indicates on page 21 – 23 that the company has investigated and documented several strategies to reduce emissions, such as:</p> <ul style="list-style-type: none"> Development of lithium batteries. Autocatalysis processes to transform hydrocarbons, carbon monoxide and nitrogen Oxides into water. Development of raw materials through zero carbon emission technologies. In the food industry the development of platinum catalysts for refrigerators.
4.5.4.2.	<p>On an annual basis, the operating company or its corporate owner shall:</p> <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>The Engagement Tracker and the E&GHG Calculations indicate that GHG reduction efforts related to company activities have been recorded with data from January 2021 to March 2022.</p> <p>The ESGR (p. 7, 59) indicates that the company shares progress towards GHG reduction targets and to reduce emissions.</p> <p>The company publicly shares reports related to GHG emissions on its website.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	2022	Basis for rating
<p>IRMA surveillance audits are often subsets of full IRMA audits with fewer chapter requirements re-assessed. A summary of Unki surveillance criteria is below.</p> <ul style="list-style-type: none"> - 19 requirements – total number of IRMA Chapter 4.6 Biodiversity, Ecosystem Services and Protected Areas criteria - 15 requirements – total number Unki surveillance audit criteria; 3 not previously scored (see Section 1.2.1.1) 		
4.6.2.1.	<p>Critical New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities.</p>	<p>The evidence, Unki Mine EIA (2003), and the Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (no date), indicates that the company has carried out screening to understand its potential impacts on biodiversity, ecosystem services and protected areas, which includes:</p> <p>Desktop-based baseline understanding of the wider environmental and ecological context within the Unki mine.</p> <p>Components/groups: soil, surface and ground water, air quality and noise; flora, avian, mammal, herpetofauna, macroinvertebrates (bio-assessment of rivers) and fish biodiversity.</p> <p>Ecosystem services.</p> <p>Possible environmental impacts associated with specific infrastructure, and with construction and operational phases.</p> <p>A list of stakeholders and a chronological summary of the public consultation were presented.</p> <p>The evidence does not include information to confirm that stakeholders (i.e., communities, NGOs) were consulted in the screening process or identification of potential impacts on biodiversity, ecosystem services, and protected areas.</p>
4.6.2.2.	<p>Screening shall include identification and documentation of:</p> <ul style="list-style-type: none"> c) Boundaries of legally protected areas in the mine’s actual or proposed area of influence, and the conservation values being protected in those areas; d) Boundaries of Key Biodiversity Areas (KBA) in the mine’s actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values 	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, Unki Mine EIA (2003), the Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (no date), and conservation maps (i.e., of the Unki mine in relation to conservation areas of Zimbabwe and Important Bird Areas (IBAs), indicate that Unki mine is not located near/adjacent to UNESCO World Heritage sites, core areas and buffer zones, legally designated protected areas or KBA.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	2022	Basis for rating
	<ul style="list-style-type: none"> e) 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 f) Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. 	
4.6.3.1.	<p>When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, Critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:</p> <ul style="list-style-type: none"> a) Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence; b) Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle; 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 	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021. The evidence, (Unki Mine EIA – 2003), included the Unki Mine base line conditions, a summary of key biodiversity values of protected and endemic species and potentially significant, direct, and indirect impacts associated with specific infrastructure, and with construction and operational phases of the Unki Project.</p> <p>Screening included the characterization of environmental components: geology, climate, topography, soils, flora, fauna, surface and ground water, air quality and noise.</p> <p>The evidence does not include:</p> <ul style="list-style-type: none"> (a) Specific engagement with relevant stakeholders about the development of the Unki baseline conditions, (b) Cumulative impacts, (c) The evaluation of options to avoid or off-set impacts, or (d) Discussions with stakeholders relating to opportunities to enhance biodiversity or ecosystem services within the mine's Aol. <p>The evidence includes a Biodiversity Baseline, Net Positive Impact (NPI) and Biodiversity and Ecosystem Services Review (March 2018) that was conducted in cooperation with Fauna & Flora International and aims at reviewing the current biodiversity baseline, biodiversity, and ecosystem services (BES) management practices, and exploring how Unki could work towards achieving a Net Positive Impact (NPI) on biodiversity, in accordance with the company's Sustainability Strategy and associated targets and objectives. The report indicates that during the assessment the site had no biodiversity baseline to measure its progress against. The report recommends actions to be taken to develop a management program to achieve NPI.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	2022	Basis for rating
	<p>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>	
4.6.4.1.	<p>Critical Mitigation measures for new mines shall:</p> <p>a) Follow the mitigation hierarchy of:</p> <ol style="list-style-type: none"> i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them; ii. Where impacts are not avoidable, minimizing impacts to the extent possible; iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and iv. As a last resort, offsetting the residual impacts. <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>Not relevant, as Unki is an existing mine.</p>
4.6.4.2.	<p>At existing mines:</p> <p>a) Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating</p>	<p>This requirement was not scored in the initial IRMA audit (2019) published in February 2021.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	2022	Basis for rating
	<p>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</p> <p>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>	
4.6.4.3.	<p>Offsetting, if required, shall be done in a manner that aligns with international best practice.</p>	<p>The evidence, Unki BMP and Gap Analysis (2022) and NPI Road Map (2022), indicates a framework for the management of biodiversity offset, the strategy, and measures for the company to achieve a Net Positive Impact (NPI).</p> <p>The evidence does not include a biodiversity offset management plan.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas		2022	Basis for rating
4.6.4.4.	<p>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; c) Provides a budget and financing plan to ensure that funding is available for effective mitigation. 	⊕	<p>The evidence, Unki BMP and Gap Analysis (2022) and Unki NPI Road Map (2022), indicates a general framework of:</p> <ul style="list-style-type: none"> Definition of measures to offset the impacts to significant biodiversity features, Monitoring program to assess the success of management actions, Monitoring the effectiveness of the BMP, A budget and financing plan for the implementation of eDNA monitoring projects. <p>The evidence does not include:</p> <ul style="list-style-type: none"> (a) specific measures with conservation outcomes, timelines, locations, and activities to offset biodiversity impacts, (b) key indicators, or (c) a budget to ensure funding for mitigation over the Unki mine lifecycle.
4.6.4.5.	<p>Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle.</p>	⊗	<p>The evidence includes the Unki BMP and Gap Analysis (2022) and Unki NPI Road Map (2022) but does not indicate that the company has a process in place to update or adapt these plans as new information relating to biodiversity or ecosystem services becomes available.</p>
4.6.5.1.	<p>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:</p> <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; 	—	<p>Not relevant. The evidence, Unki Mine EIA (2003), and the Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (no date), indicate that the Unki mine is not planning to carry out new exploration activities or develop new mines in areas located near/adjacent to UNESCO World Heritage Sites, core areas and buffer zones, legally designated protected areas or KBA.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	2022	Basis for rating
	<ul style="list-style-type: none"> c) Conducts mining-related activities in a manner consistent with protected d) Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. 	
4.6.5.3.	<p>Critical IRMA will not certify new mines that are developed in or that adversely affect the following protected areas:</p> <ul style="list-style-type: none"> - World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; - IUCN protected area management categories I-III; - Core areas of UNESCO biosphere reserves. 	<p>Not relevant. Unki is an existing mine. The evidence, Unki Mine EIA (2003), and the Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (no date), indicate that Unki mine is not located near/adjacent to UNESCO World Heritage Sites, core areas of UNESCO biosphere reserves and IUCN Protected areas.</p>
4.6.5.4.	<p>Critical An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:</p> <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 special values for which the area was designated or recognized; and c) The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. 	<p>Not relevant. The evidence, Unki Mine EIA (2003), and the Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (no date), indicate that the Unki mine is not located near/adjacent to a declared national or international protection area.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas		2022	Basis for rating
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.	⊗	The company has not yet implemented a monitoring program for biodiversity and ecosystem services. The evidence includes a Biodiversity Management Plan and Gap Analysis (2022), which indicates that a monitoring program is still in development.
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.	⊗	The company has not yet implemented a monitoring program for biodiversity and ecosystem services. The evidence includes a Biodiversity Management Plan and Gap Analysis (2022), which indicates that a monitoring program is still in development.
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.	⊗	The company has not yet implemented a monitoring program for biodiversity and ecosystem services. The evidence includes a Biodiversity Management Plan and Gap Analysis (2022), which indicates that a monitoring program is still in development.
4.6.6.4.	The findings of monitoring programs shall be subject to independent review.	●	The evidence, Responses to Comment by Flora & Fauna International on the Unki Mine Biodiversity Baseline Assessment Progress Report, January 2020 (February 2020) is a high-level review of Unki's biodiversity assessment progress by an NGO and corresponds to a draft version of an independent review. The evidence indicates that a monitoring program is not yet being implemented (refer to 4.6.6.1.).

Chapter 4.7—Cyanide Management

This chapter was not assessed as part of the Unki initial or surveillance audit.

Chapter 4.8—Mercury Management

This chapter was not assessed as part of the Unki initial surveillance audit.