

# **MINE SITE ASSESSMENT PUBLIC SUMMARY REPORT**

MINE SITE

**Mototolo Complex**

OPERATING COMPANY

**Rustenburg Platinum Mines**

COUNTRY OF OPERATION

**South Africa**

**FEBRUARY 2024**

# Acknowledgements

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

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

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# Audit Details

Name of Mine:	Mototolo Complex
Operating Company:	Rustenburg Platinum Mines
Mine Owner:	Anglo American
Country of Operation:	South Africa
Mined Material(s):	PGM, platinum, palladium, rhodium, iridium, ruthenium, gold, nickel, copper, cobalt, chrome
Employees / contractors:	3,720 in January 2021 (1,559 employees, 2,160 contractors)
IRMA Audit Webpage	<a href="https://responsiblemining.net/mototolo">https://responsiblemining.net/mototolo</a>
Audit Type:	Initial IRMA Verification Audit
Audit Dates:	Stage 1: 05 – 23 July 2021 Stage 1.5 virtual: 7-9 December 2021 Stage 2: 10-13 May 2022 Follow-up Assessment: 22 – 23 May 2023
Audit Team:	Philip Underhill - Lead Auditor, Andrew Mathewson and Danielle Sanderson - Social Auditors, Will Huggett and Prenisha Chetty – Environmental, Health, and Safety, Maitshoko Tumane and Malefa Moleme - Support and Translation
Audit Firm Declaration:	<ul style="list-style-type: none"> <li>✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) as presented during the Stage 1 and Stage 2 audit activities.</li> <li>✓ The audit team members were deemed to have no conflicts of interest with the mine.</li> <li>✓ The audit team members were professional, ethical, objective and truthful in conducting the audit.</li> <li>✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</li> </ul>
Scope of Audit	The scope includes extraction concentration, and processing of ore, and mining-related waste disposal at the Mototolo Complex located in the Limpopo province, South Africa.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
Certification Body (CB):	ERM CVS
CB Technical Reviewer:	Karin Arnold
Achievement Decision date:	16 February 2024
Achievement Valid Until	15 February 2027 (contingent upon outcome of surveillance audit and continuous compliance with the IRMA independent audit processes)
IRMA Reference Number:	IRMA-STD-ERM-001-V-03453

# 1. Mine Site Overview

## 1.1. Overview of Location

The Mototolo Complex is located within the Fetakgomo Tubatse Local Municipality (FGTLM), which is in the Limpopo province in north-eastern South Africa. The operation is on the northeastern limb of the great Bushveld mineral complex.

The Mototolo Complex is surrounded by agricultural land and land used for game farming. The town of Ga-Malekana is the nearest urban hub, (population of 3,775 in 2011), and is located approximately 15 km north west of the Complex. The towns of Madidimola, (population of 1,820 in 2011), and Ga-Masha, (population of 12,772 in 2011), are located adjacent to Ga-Malekana. Steelpoort, (population of 1,105 in 2011), is located 40 km northwest of the Complex. The larger town of Burgersfort, (population of 6,369 in 2011), is approximately 25 km northeast, while Mashishing, (population of 40,714 in 2011), is 40 km to the east.<sup>1</sup> The audit team notes that South Africa conducted a census in 2022, and at the time of this audit, the updated census results were pending. The updated census data will be reflected in future audit reports.

In 2021, Anglo American approved the Mototolo Complex life extension project, which involved utilizing the existing Mototolo infrastructure to extend into the adjacent and down-dip Der Brochen resource (Anglo American, 10 December 2021). The Mototolo Complex borders the northern section of the Der Brochen Mine, and is surrounded by both the Two Rivers Platinum Mine and Dwarsrivier Mine in the north, and Booyensdal Mine to the south.

Mototolo Complex is located in mountainous topography, with elevations ranging between 940 m and over 2 000 m above mean sea level.<sup>2</sup> The nearest nature reserve is the Lapolosa Wilderness, 15 km north east of the Mine. Surface water from Mototolo flows via several unnamed ephemeral tributaries and drainage lines into the perennial Groot-Dwars River. The Mototolo Complex is predominantly located in the Open Bushveld Habitat Unit, and the Sekhukhune Mountain Bushveld Habitat. These habitats have areas of high biodiversity and increased sensitivity, (SRK, 2019).

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<sup>1</sup> StatsSA, 2011, Statistics South Africa, 2011 Census.

<sup>2</sup> SRK Consulting, 2019, Der Brochen Amendment Project - Environmental Impact Assessment & Environmental Management Programme Report.



## 1.2. Overview of Operation

Mototolo Complex infrastructure consists of two decline shafts, a concentrator, and a chromite processing plant. The Der Brochen decline shaft was being developed at the time of the audit. The complex processes platinum and chrome bearing ore at the Mototolo Concentrator Plant, which is received via conveyor belt from the underground operations at the two main shafts Lebowa in the north, and Borwa in the south. Processed ore is stored in a run-of-mine silo which feeds the jaw crusher. The jaw crusher product is stored in two mill feed silos with vibrating feeders underneath. The primary mill is fed via the vibrating feeders through blending of ore to get the optimal Particle Size Distribution. The primary mill product feeds the rougher circuit of the flotation circuit.

Concentrate streams are taken to the cleaners for further upgrading before being filtered and transported to the Polokwane Smelter via trucks for further processing. The tails of the rougher circuit are re-milled in the secondary mill, and the secondary mill product feeds the scavenger circuit. The tails of the scavengers are combined with those of the cleaner tails and pumped to the spiral plant for chrome recovery, and the tails of the chrome plant are then thickened to recover water for further use in the process. The thickener underflow is sent to be disposed of via pipeline systems to the Helena Tailings Storage Facility (TSF) and the Mareesburg TSF. The water contained in the tailings' slurry rises to the top of the Tailings Storage Facilities (TSFs) and then collects in the return water dams of the Helena and Mareesburg Tailings Storage Facilities (TSFs). The water is recirculated for reuse via water pipeline systems to the Mototolo Concentrator Plant.

Current mining operations are focused on the UG2 Reef with exposures of the Merensky Reef limited to several historical audits. Mototolo Complex is a mechanized, trackless, bord-and-pillar underground operation. The underground mining equipment used is designed to exploit narrow reef orebodies and maximizes reef extraction by placing the primary development on reef.

In January 2021, Mototolo Complex had a total of 3,720 employees, of which employees were 1,559 and contractors were 2,160.

### 1.2.1. Scope of Activities and Facilities Included in Audit

The scope of this IRMA Assessment is for the Mototolo Complex, including:

- Two decline shaft systems with crushers – Mototolo Lebowa (north) and Mototolo Borwa (south)
- One decline shaft in development
- Above ground conveyor systems from Lebowa Shaft, connecting through Borwa Shaft to the Mototolo concentrator
- Mototolo concentrator
- Tailings Storage Facilities including, the Helena TSF (operational from 2006 and now at its end of life) and the newer Mareesburg TSF (constructed in 2018 and in phase 1)
- Waste Rock Disposal Areas

## 2. Mine Site Assessment Process

### 2.1. Overview of IRMA Process

The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).<sup>3</sup> When the self-assessment has been completed, the independent, third-party assessment may begin.

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

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

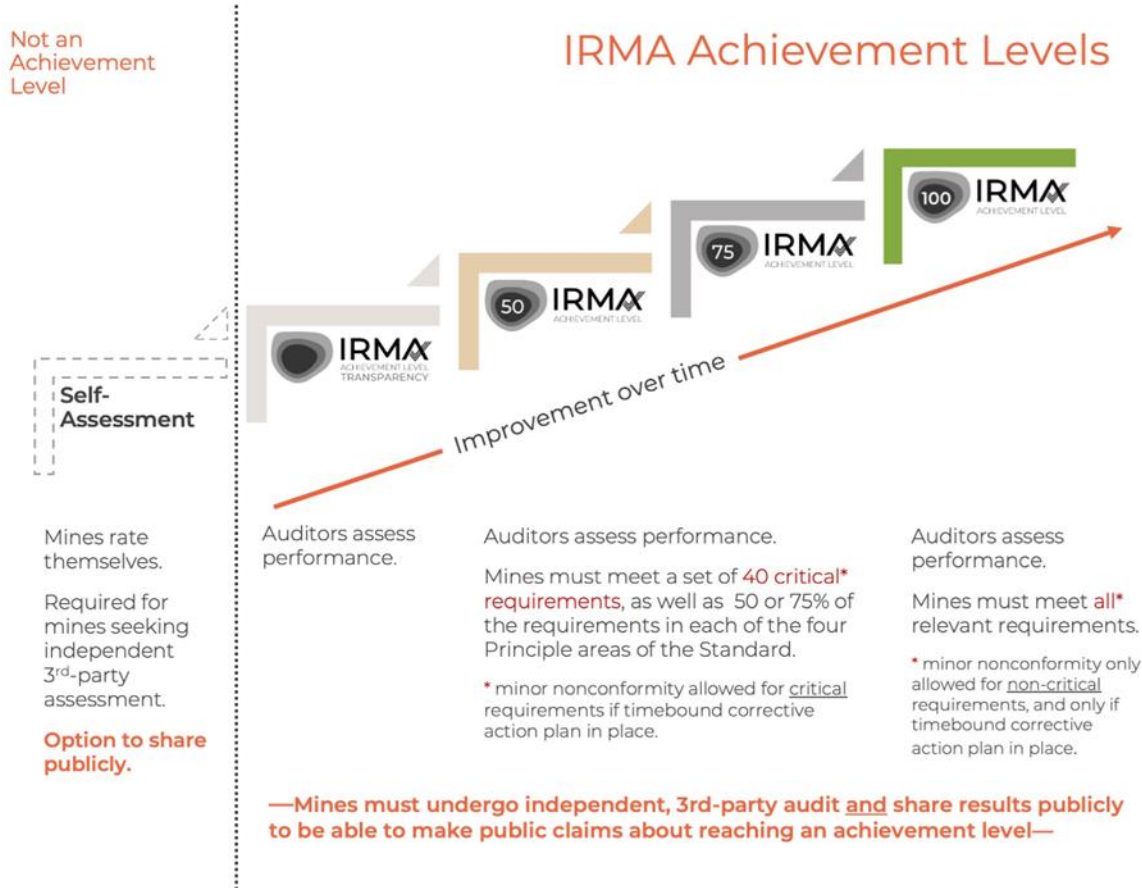
Based on observations, interviews and information evaluated during Stage 1 and Stage 2, auditors determine if mines are fully, substantially, partially or not meeting all of the IRMA Standard requirements relevant at the mine site. The decision regarding a mine site's achievement level is made by the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

**IRMA recognizes four levels of achievement.** For a complete description of the assessment process and achievement levels, see IRMA's Assessment Manual for Mines, available on IRMA's web site.<sup>4</sup>

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<sup>3</sup> <https://tools.responsiblemining.net/self-assess/>

<sup>4</sup> 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 <https://responsiblemining.net/resources/#independent-3rd-party-assessment>



### 2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining by external auditors. Audits are conducted by auditors who: have undergone IRMA training, meet IRMA competency requirements and have been deemed to have no conflicts-of-interest with the mine site under assessment.<sup>5</sup>

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).<sup>6</sup> In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

<sup>5</sup> See IRMA Certification Body Requirements, v.1.0, pp. 18-19, and Annex A. [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)

<sup>6</sup> See IRMA Certification Body Requirements, v.1.0, p 32. [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)

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

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

### 2.1.2. IRMA Complaints Process

If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the IRMA website.<sup>7</sup> Details on the complaints process can be found in IRMA's Issues Resolution Procedure.<sup>8</sup>

## 2.2. Audit Process and Timeline

- Mototolo Complex completed the initial self-assessment for Mototolo in April and May 2021.
- ERM CVS carried out an initial Stage 1 desktop audit from the 29 June – 23 July 2021.
- ERM CVS carried out a limited scope virtual audit from 7 – 9 December 2021, as the planned Stage 2 assessment could not go ahead due to disruptions caused by the COVID-19 Omicron outbreak.
- ERM CVS conducted a Stage 2 on-site audit from 10– 13 May 2022.
- Mototolo Complex elected to use an IRMA-allowed early corrective action period to address certain shortfalls identified in the audit, which then required verification by ERM CVS.
- ERM CVS conducted a follow-up assessment from 22 – 23 May 2023, to verify Mototolo's corrective actions.

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

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<sup>7</sup> IRMA website: "Complaints and Feedback." <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

<sup>8</sup> IRMA Issues Resolution System Procedure. Version 1.0. January 2020. [https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System\\_2020.pdf](https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf)

## 2.3. Stakeholder Engagement

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

Thirty days prior to the on-site assessment, the Stage 2 Assessment was announced on the ERM CVS website, IRMA's website, and through IRMA's free email distribution newsletter. The announcement included an invitation to stakeholders to participate in the assessment. Further, ERM CVS prepared a similar announcement in Sepedi that was distributed via email to representatives in the surrounding communities and posted on the ERM CVS website. Community representative contact details were obtained from the Mototolo stakeholder database. Mototolo placed ERM CVS's announcement on community notice boards and sent it to local media to inform stakeholders about the audit and their opportunity to participate in the audit process.

During the assessment external interviews highlighted dissatisfaction with the site's stakeholder engagement efforts. Their comments are reflected in rationales and ratings in 1.2 Community and Stakeholder Engagement and 1.4 Complaints and Grievance Mechanism and Access to Remedy.

### 2.3.1. Written Comments/Inquiries

ERM CVS did not receive any written comments or queries prior to or during the assessment.

### 2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit and included individuals from the Stage 2 and follow-up audits.

**Table 1. Mine Staff Interviews**

Position/Role
Stakeholder Engagement Manager
Local Socioeconomic Development Manager
Community Relations Officer
Social Performance Manager
Senior HR Manager of Operations
HR Coordinator, Lebowa Shaft
HR Coordinator of Operations, Concentrator
Mine Manager
Intern SP
Chief Executive Officer
AAP Corporate Financial Accounting Manager
Financial Accounting Manager, Amandelbult
Reporting Projects and Energy Specialist

Safety, Health, and Environment Manager
Reclamation and Closure
Resource Geologist, Site Specialist
Safety, Health, and Environment Administrator, Sentinel
Safety, Health, and Environment Coordinator, Due Diligence and Audit
Risk Supervisor
Chief Professional Nurse
HRD Coordinator Operations
Protection Services Senior Superintendent
Cultural Heritage, Corporate
Miner
Belt Attendant
Safety, Health, and Environment Administrator
Mining Production
Senior Engineering Manager

### 2.3.3. Workers/Contractors

During the Stage 2 assessment, ERM CVS conducted 13 scheduled worker engagements including 7 individual employee and contractor interviews, and 5 group interviews, (two to six people) for a total of 23 workers interviewed. Scheduled worker interviews were supplemented by additional impromptu interviews with individuals or groups in various mine work sites during the Environmental, Health, and Safety portion of the audit process. ERM CVS went through a process to select workers to interview, and once interviewees were selected, Anglo American assisted with logistics to ensure that workers were available for interviews at the requested times and that the interview location was accessible to workers at the time of the interview. Interviews included employees and contractors from several different departments, chosen to represent different age groups; genders; years of experience; work groups, and operational, administrative, health care or union responsibilities. Topics discussed included working conditions, with specific attention on women and vulnerable groups, freedom of association, health, and safety, etc. The engagements took place on-site at various locations in designated conference rooms and offices. The worker interviews were conducted without Anglo American management personnel present. Supervisory staff were interviewed individually. However, they did not participate in any group meetings so as not to bias or influence employee responses.

**Table 2. Worker Interviews**

Date	Meeting Type	Role/ Position	Total Number of Attendees	Female/ Male
10/05/2022	Safety Contractors	Safety representative	2	2 M
10/05/2022	Group interview: subcontractors	Operational risk practitioner Reagent assistant Issuing clerk for PPE	3	3 F
10/05/2022	Individual worker interview	Belt attendant	1	1 F
10/05/2022	Group interview: subcontractors	Salvage stand attendant RDO	2	1 M 1 F
11/05/2022	Individual worker interviews	SHE administrator	1	1 F
11/05/2022	Individual worker interviews	Mining production	1	1 F
11/05/2022	Group worker and contractor interviews	Production Millwright Miner Ventilation	4	4 M
11/05/2022	Individual worker interview	Assistant Miner	1	1 F
11/05/2022	Individual interviews	Cleaner	1	1 M
11/05/2022	Individual contractor interviews	Facilitator	1	1 M
11/05/2022	Individual worker interview	Miner	1	1 M
13/05/2022	Group worker interview	HR representatives	5	4 M 1 F

During the Follow-up Assessment, ERM CVS conducted 19 scheduled individual worker engagements during the follow-up assessment in May 2023. The process to set up the follow-up worker interviews was the same as the process described above.

**Table 3. Worker Interviews – Follow Up Assessment**

Date	Meeting Type	Role/ Position	Total Number of Attendees	Female/ Male
22 May2023	Individual worker interview	Tip Attendant	1	1 F
22 May2023	Individual worker interview	Miner Assistant	1	1 F
22 May2023	Individual worker interview	Assistant Artisanal Assy	1	1 F
22 May2023	Individual worker interview	Mining	1	1 M
22 May2023	Individual worker interview	Mining	1	1 M
22 May2023	Individual worker interview	Engineering	1	1 M
22 May2023	Individual worker interview	Logistics	1	1 M
22 May2023	Individual worker interview	Diesel Mechanical Engineering	1	1 M
23 May2023	Individual worker interview	TMM- Workshop	1	1 M
22 May2023	Individual worker interview	Mining	1	1 M
22 May2023	Individual worker interview	PTV (Pipe Track Ventilation)	1	1 M
22 May2023	Individual worker interview	Cleaner	1	1 F
22 May2023	Individual worker interview	Explosive Transporter	1	1 F
22 May2023	Individual worker interview	Belt Attendant	1	1 F
22 May2023	Individual worker interview	Explosive Helper Underground	1	1 F
22 May2023	Individual worker interview	Belt Attendant	1	1 F
22 May2023	Individual worker interview	Cleaner	1	1 F
22 May2023	Individual worker interview	Explosive Helper	1	1 F
22 May2023	Individual worker interview	Boiler Maker	1	1 M

### 2.3.4. Government Agencies

With assistance from the operating company, the assessment included one community forum session attended by representatives of two local and one district municipality. With

municipality project manager and community participation, the session highlighted general community issues, mine-related benefits, projects and grievances.

**Table 4. Government Agencies Interviews**

Local Council	Location	Total Number of Attendees
Fetakgomo Tubatse Local Municipality Thaba Chweu Local Municipality Sekhukhune District Municipality	Chrome Valley Lodge	22

ERM CVS was not able to schedule an interview with the responsible national government regulatory agency (Department of Mineral Resources) during the Stage 2 assessment or follow-up assessment due to scheduling difficulties. Given this challenge, surveillance audit will prioritize government agency engagement.

### 2.3.5. Participating Communities and NGOs

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

On the first day of the Stage 2 audit, Mototolo provided an orientation vehicle tour of the area surrounding the Mine, including informal settlements and projects that had been supported by the Mine. During the Stage 2 audit, ERM CVS conducted community meetings with community groups and NGOs, held both on-site and at community halls in proximity to the Mine. Where required, transport to meeting sites was provided by the Mototolo/ mining company. Meetings varied in size from one-to-one meetings to larger group meetings and included both community leaders and members. Communication and organization of the meetings was facilitated by Mototolo mining personnel but were conducted by ERM CVS auditors without Mototolo mining personnel present.

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

Community, NGO Name	Location	Total Number of Attendees
Ga-Leshaba Community	Ga-Leshaba Households (Family Homestead)	4
Local Traditional Authorities	Chrome Valley Lodge	9
Moletsi Noks Development Trust	Der Brochen SP (Social Performance) Boardroom	3
Ga-Mawela Communal Property Association/St’ George & Pakaneng Communal Property Association	Community Hall in Ga-Mawela	17

## 2.4. Summary of Mine Facilities Visited

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

**Table 6. Areas visited during the on-site audit**

General area	Description
Operational areas	Concentrator/process plant Borwa and Lebowa Shafts Borwa and Lebowa Workshops Mareesburg Tailings Storage Facility Medical and IH facilities Fire House/Emergency facilities Waste & chemical storage areas
Other areas visited (e.g., downstream watercourses, off-site facilities)	Chrome Valley Lodge Malekana Community Hall
Surrounding Communities	Ga-Malewa Community Ga-Leshaba Community

## 3. Summary of Findings

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

### 3.1. Audit Outcome

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

### 3.2 Scores by IRMA Standard Principle and Chapter

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

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
<b>Principle 1: Business Integrity</b>		<b>88</b>	<b>114</b>	<b>77%</b>
Chapter 1.1—Legal Compliance	Yes	13.5	16	84%
Chapter 1.2—Community and Stakeholder Engagement	Yes	25.5	32	80%
Chapter 1.3—Human Rights Due Diligence	Yes	15.5	24	65%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	15.5	22	70%
Chapter 1.5—Revenue and Payments Transparency	Yes	18	20	90%
<b>Principle 2: Planning for Positive Legacies</b>		<b>107</b>	<b>134</b>	<b>80%</b>
Chapter 2.1—Environmental and Social Impact Assessment and Management	Yes	52.5	58	91%
Chapter 2.2—Free, Prior and Informed Consent	No	-	-	-
Chapter 2.3—Community Support and Benefits	Yes	10.5	16	66%
Chapter 2.4—Resettlement	No	-	-	-
Chapter 2.5—Emergency Preparedness and Response	Yes	8.5	10	85%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	35.5	50	71%
<b>Principle 3: Social Responsibility</b>		<b>144.5</b>	<b>186</b>	<b>78%</b>
Chapter 3.1—Fair Labor and Terms of Work	Yes	52.5	60	88%
Chapter 3.2—Occupational Health and Safety	Yes	41	46	89%
Chapter 3.3—Community Health and Safety	Yes	8	22	36%
Chapter 3.4—Conflict-Affected and High-Risk Areas	No	-	-	-
Chapter 3.5—Security Arrangements	Yes	23	32	72%

Chapter 3.6—Artisanal and Small-Scale Mining	No	-	-	-
Chapter 3.7—Cultural Heritage	Yes	20	26	77%
<b>Principle 4: Environmental Responsibility</b>		<b>134</b>	<b>174</b>	<b>77%</b>
Chapter 4.1—Waste and Materials Management	Yes	49.5	56	88%
Chapter 4.2—Water Management	Yes	26.5	38	70%
Chapter 4.3—Air Quality	Yes	13	18	72%
Chapter 4.4—Noise and Vibration	Yes	12	18	67%
Chapter 4.5—Greenhouse Gas Emissions	Yes	9.5	14	68%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	23.5	30	78%
Chapter 4.7—Cyanide Management	No	-	-	-
Chapter 4.8—Mercury Management	No	-	-	-

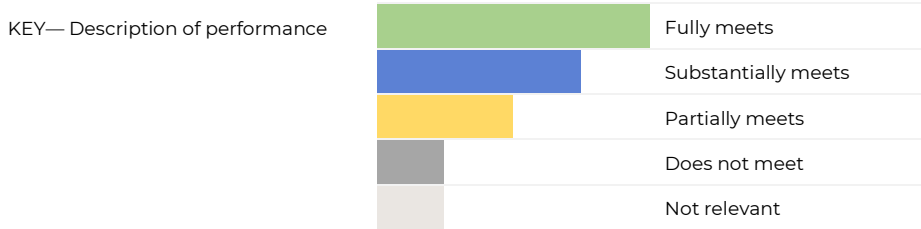
\* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials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

Chapters deemed Not Relevant do not factor into the principal scores.

### 3.3. Performance on Critical Requirements

Critical requirements consist of 40 requirements identified by the IRMA Board of Directors as core requirements that any mine site claiming to be following good mining practices 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.

#### 3.3.1. Snapshot of performance on 40 critical requirements



### 3.3.2. Performance on 40 Critical Requirements.

RATING LEGEND  
Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

#### Principle 1: Business Integrity

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

#### Principle 2: Planning for Positive Legacies

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

### Principle 3: Social Responsibility

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

### Principle 4: Environmental Responsibility

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

4.8.2.3.	Mercury wastes are not permanently stored on site without adequate safeguards,	N
4.8.2.2.	are not sold or given to artisanal or small-scale miners and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories.	N

## 4. Next Steps

### 4.1 Corrective Action Plans

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

Following the Stage 2 Assessment, the Mototolo Complex prepared a corrective action plan to address major non-conformities with critical and other requirements, with the goal of improving their overall achievement level. ERM CVS conducted a follow-up assessment to verify the implementation of corrective actions to improve performance against the Critical Requirements in May 2023. The findings of the follow-up assessment are included in this report.

Mototolo's current corrective action plan to address additional areas of performance, with the goal of improving performance during the audit cycle, is provided as Appendix B.

### 4.2 Disclosure of Summary Audit Report

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

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

### 4.3 Timing of Future Audits

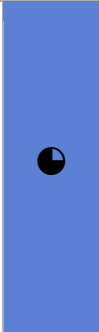
The IRMA system is a 3-year cycle, meaning that an operation goes through a recertification assessment every 3 years, with an interim assessment required within 18 months of each formal reassessment. Mototolo Complex's surveillance audit will take place no more than 18 months after the initial IRMA assessment report is published, (this Assessment).

# APPENDIX—Results by Requirement


## Principle 1: Business Integrity

RATING LEGEND  
Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Requirement #	Requirement Text	Rating	Basis for rating
Chapter 1.1—Legal Compliance			
1.1.1.1.	<b>Critical</b> The operating company shall comply with all applicable host country laws in relation to the mining project.		<p>A compliance obligations procedure has been provided which outlines the processes in place and demonstrates compliance on a site level with applicable laws, regulations, permits, standards, codes, and other external requirements to which the Mototolo Complex subscribes through an effective compliance management culture and system that includes documents, records, and data control. The site makes use of the Isometrix software platform to track compliance across the entire business.</p> <p>Auditor review of this compliance management system noted examples of repeat compliance issues and overdue compliance related actions documented by the system. These suggest that the compliance management system is</p>



Requirement #	Requirement Text	Rating	Basis for rating
		L	identifying issues but is not fully effective at managing compliance and preventing noncompliance.
1.1.2.1.	The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.	L	No evidence was identified of any conflict in terms of Mototolo meeting IRMA requirements and South African legislative requirements.

Requirement #	Requirement Text	Rating	Basis for rating
1.1.3.1.	If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring.		<p>Intent to demonstrate compliance was observed. However, the Mototolo site is unable to demonstrate substantial close out of mitigation actions to address previously identified non-compliances. The Water Use License actions for the Concentrator and Mototolo Complex show a 62% close out. Waste License actions for both Borwa and Lebowa highlighted an action to conduct a risk assessment was entered into the site's tracking system. However, the action was not yet executed. A risk assessment has not yet been conducted. It was noted that this action has been outstanding since September 2021.</p> <p>Exceedances of Water Quality limits (Water Use License) were noted in the Water Use License Action Plan, dated 24-05-2021. Besides notification of the Department of Water and Sanitation, it is unclear if additional actions have been documented that would assist in demonstrating full compliance.</p> <p>Observations were noted in the Compliance Reporting for March and April 2022 that repeat actions were evident in both reports. Overdue compliance related actions were observed in Isometrix since December 2021.</p> <p>The mine does not have mechanisms in place to ensure all business partners (contractors) are fulfilling their statutory requirements in respect of their labor practices.</p> <p>Since the Stage 2 on site assessment, various actions have been taken to address hazards associated with high-risk tasks undertaken by employees and contractors. Revisions to the existing policies, procedures and risk assessments have been completed and further reviews are envisaged as and when gaps in the high-risk tasks are identified.</p>

Requirement #	Requirement Text	Rating	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.		<p>Actions to address non-compliances are entered into the site's tracking system and assigned to a responsible person to be addressed by a specified target date. Contractors are provided with an onboarding program prior to commencement of activities at the mining company.</p> <p>It is unclear how the requirements of IRMA are communicated to contractors to ensure their compliance. On site evidence illustrates that some contractors interviewed do not meet the IRMA requirements.</p>
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.		<p>Records and documentation to demonstrate compliance are managed through Isometrix.</p> <p>However, overdue compliance related actions were identified in the tracking system, dating back to December 2021. Overdue actions were related to permit renewals whereby target dates were extended on the Isometrix system from November 2021 to December 2021. At the time of the on-site assessment in May 2022, these actions associated with permit renewals were observed as being overdue</p>
1.1.5.2.	Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors, and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies.		Records and documentation to demonstrate compliance are managed through Isometrix and this information was made available to auditors.
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.		External environmental audits for all the valid environmental authorizations are undertaken. The audit reports are published for public review in terms of Regulations 34(6)(a)(b) on the company website. Any other reports will be made available to public enquirers upon request.
1.1.5.4.	Where the operating company claims that records or documentation contains confidential business information, it shall:		Confidential information was outlined and described, and where possible shared with the auditors for review and further assessment.

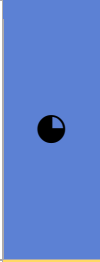
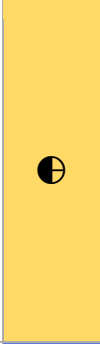
Requirement #	Requirement Text	Rating	Basis for rating
	<p>a. Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and</p> <p>b. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information.</p>		
<b>Chapter 1.2—Community and Stakeholder Engagement</b>			
1.2.1.1.	The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities.	L	Identification and analysis of stakeholders is undertaken by the site. The Stakeholder Engagement Plan provides stakeholder identification and analysis exercise on pages 18-24. The community zone of influence map identifies affected communities based on their distance from the operation infrastructure. A Stakeholder Contact Register lists all details, including contact details of stakeholders. Sufficient stakeholder identification and mapping has been undertaken through the Stakeholder Engagement Plan and associated processes.
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.	L	A Stakeholder Engagement Plan is in place and currently under review with the intent to update. A Stakeholder Impacts Assessment and Risk Register review demonstrates that the Stakeholder Engagement Plan is scaled to meet risks and impacts specific to the operation. The Stakeholder Engagement Plan includes risks and assessments specific to the project and accounts for them in engagement protocols (pg. 14, 18 - 24) undertaken by independent consultant has several impacts as well as the baseline conditions of the receiving area that have been transferred into the Stakeholder Engagement Plan and clearly considered in approach to engagement with communities.
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	⊕	Evidence was reviewed of a variety of engagements with several stakeholder types, including women and marginalized groups, (special groups). Provision of grievance mechanism in Sepedi shows efforts to remove language barriers of engagement relating to the grievance mechanism. The site has been recognized


Requirement #	Requirement Text	Rating	Basis for rating
	taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups).		by the Department of Mineral Resources and Energy for its commitment to engagement. Input on engagement protocols and strategies are not demonstrated currently. The site intends to do so through the Community Engagement Forum proposed model - May 2021, to be implemented in 2022.  Stakeholder engagement indicated that current methods (community meetings, grievance mechanism) are not easily accessible, or not effective, and broader stakeholders have not been engaged on the design of engagement procedures and barriers remain.
1.2.1.4.	The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or mitigate community conflicts that might otherwise occur as a result of company engagement processes.	●	The 2021 Stakeholder Engagement Plan illustrates thorough stakeholder mapping and analysis, and a focus on managing internal stakeholder conflict (between community groups). The Community Engagement Forum and Social and Labor Plan engagement (2021) were undertaken in separate forums appropriate to known conflicts, (e.g., separating business and recruitment groups).
1.2.2.1.	Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning)	L	Evidence demonstrates ongoing engagement with stakeholders at existing operations and with respect to the De Brochen Project (new shaft and tailings facility).  Correspondence/engagement between operation and stakeholders clearly demonstrated through evidence, including invitation to a Small Medium and Micro Enterprise supplier open day, grievance register and management and correspondence relating to legal action through Mokwana Attorneys. Dates suggest that engagement is ongoing and continues throughout the year. Stakeholder engagement is ongoing, and well documented. Evidence from site audit suggests that communities and directly affected stakeholders of the Der Brochen site are not satisfied with historical or ongoing engagement and apparent lack of transparency and feedback from the mine are ongoing issues.
1.2.2.2.	<b>Critical</b> The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner;	●	.  a.) Example of Project Close out Report - NOK demonstrates how election of trustees for next of kin of Deceased Relatives were elected in great detail, COVID-19 Community Response Plan presented 13 April (first case reported 5 March), SLP engagement sessions on Recruitment and Procurement/Supply Chain



Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;</li> <li>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;</li> <li>d. Soliciting feedback from stakeholders on issues relevant to them; and</li> <li>e. Providing stakeholders with feedback on how the company has taken their input into account.</li> </ul>		<p>Community Structures open to public, with contact for enquiries provided. each SLP project outlined in presentation.</p> <p>However, the community representative interviewed did not feel that they received transparent and timely feedback.</p> <p>b.) Grievance Register demonstrates where site management allocated responsibility to address grievances according to nature of grievance. Third party appointed to develop SEP, Community Perceptions Study and to establish the CEF (not established due to ongoing community disagreements).</p> <p>Interviews with community stakeholders indicated that the representatives they met with from the mine did not give feedback or do anything about their grievances.</p> <p>c.) Meetings recorded as starting with Prayer and culturally appropriate introductions. Grievance over graves in grievance register demonstrates respectful and transparent engagement process starting with an acknowledgement letter and resolved with a legal response.</p> <p>Interviews with parties affected by grave relocations, however, indicated that the correct procedure for relocation and compensation was not followed, and despite engagement with DBM they have not received response or resolution they find satisfactory.</p> <p>d.) Community Perceptions Project being undertaken to solicits feedback from stakeholders on number of topics.</p> <p>Interviews with doorstep communities indicated that they are not involved in resolving issues that affect them, and do not get sufficient feedback or opportunity to develop suitable procedures.</p> <p>e.) Presentation on SLP to community forums demonstrates how community concerns/needs are considered and incorporated into programs. Grievance register demonstrates how grievances addressed and outcomes shared with concerned stakeholders.</p> <p>However, a number of communities members perceived that the grievance procedure was not beneficial, and they did not receive timely and transparent feedback from the site"</p>
1.2.2.3.	The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form		Development of the Community Engagement Forum demonstrates intent to drive collaborative engagement through a dedicated mechanism (evidence through Community Engagement Forum Model) and ongoing engagement




Requirement #	Requirement Text	Rating	Basis for rating
	stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project's environmental and social performance, and/or input to the company on issues of concern to stakeholders.		with multiple stakeholders (including traditional authorities, local business structures, local municipality, NGOs (non-governmental organizations), and marginalized groups) demonstrated through attendance registers, invitations, and minutes. The Social and Labor Plan and the Engagement Plan outlines engagement plans for the period between 2021 and 2025. Full implementation will only be met with the implementation of the Community Engagement Forum in 2022.
1.2.2.4.	Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives.	L	<p>The Stakeholder Engagement Plan outlines the engagement process that is "inclusive, enables participation and creates sustainable relationships". The Stakeholder Engagement Plan identify vulnerable stakeholders, including women, youth and employees of contractors, their primary issues, and concerns and how they should be engaged to ensure participation. The Stakeholder Engagement Plan includes an engagement process that is "inclusive," enables participation and creates sustainable relationships as well as specific processes to be followed for vulnerable groups.</p> <p>Preliminary Community Engagement Forum and Social and Labor Plan engagement included "Special Group", which included NGOs, early childhood development centers, elderly, and people with disabilities. Posters use pictorial language (not written) to show how grievances can be raised, telephone calls and meetings used to communicate with the Social Performance team.</p>
1.2.2.5.	When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether or not such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community.	D	The intent to improve has been demonstrated by the site in setting up a family trust for land claimed within the footprint of the Der Brochen project to manage specific land, cultural and community issues associated with the site. There is evidence to suggest that in some instances there is a misalignment between community representation and communities they represent, including a disagreement by some community members with the democratically elected representative for community trusts.



Requirement #	Requirement Text	Rating	Basis for rating
1.2.2.6.	The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.	L	Documentation of engagement process clearly demonstrated in meeting minutes, attendance registers and grievance registers. Input from stakeholders demonstrated in grievance register as well as meeting minutes. Company feedback demonstrated in grievance register and grievance update. The engagement processes are well documented.
1.2.2.7.	The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes.	●	<p>Invitees to two stakeholders who raised grievances to attend a feedback meeting relating to trustee elections demonstrate feedback as does a letter relating to gravesite grievance that updates affected stakeholders on the progress of determining if it is a legitimate gravesite. A stakeholder accountability report is required going forward in Social Way 3.0, every 5 years. Grievance register maintains a record of grievances raised and status of grievances and actions taken.</p> <p>Interviews with external stakeholders indicated a perceived lack of transparency and timely feedback.</p> <p>Communications through formal channels (meetings) and on a request basis appears to be met; however external stakeholder perceive a lack transparency and timely feedback.</p>
1.2.3.1.	The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement.	●	<p>Evidence demonstrates capacity building being undertaken on a needs basis for directly affected stakeholders, and on an ongoing basis for broader stakeholders within the area of influence. This includes capacity building sessions with the local municipalities to align with the Social and Labour Plan, community training in business management.</p> <p>Ongoing engagement with external forums indicates that there are opportunities for engagement and capacity building. The extent to which this is used by stakeholders differs for several reasons and is not being monitored and evaluated effectively. A number of the requirements to participate in the capacity building, including school completion certificate, cannot be met by community members, and there are barriers for communities to access training, including access to internet and physical transport to sites.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.2.4.1.	Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information.		The mine has processes to disclose information relating to their performance. As per the Group Information Security Policy, results of this IRMA audit will be made public by the operating company.  IRMA performance has not been assessed until now, so can only be fully met once evidence of IRMA information circulation can be provided. The intent of this requirement is being met, as evidence of the pending IRMA audit was noted at several sites.
1.2.4.2.	If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested.		Evidence, including letters and communication with community members, demonstrates how reasonable and unreasonable information requests are managed. The Social Performance team responds to requests for meetings when information needs to be explained.  There is evidence of feedback sessions and ongoing communications with stakeholders to clarify information requests; however, the overall perception of external stakeholders is a lack of transparency and response from the site.
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		Grievance mechanism is provided in a medium of both English and Sepedi, and in pictogram format (to address illiteracy) and mine uses a locally distributed newspaper (Platinum Times) to inform stakeholders of mine activities, again printed in both Sepedi and English. Other methods include radio (past and proposed, not currently due to covid), community meetings, direct telephonic contact, provision of social performance team cell numbers to allow easy contact. Establishment of family trust groups and focus groups meetings for special or specific groups appears to cover many of the affected population.  Interviews with external stakeholders indicated a perception that there is a lack of transparency and timely feedback.
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.		The site demonstrates the effort to provide written feedback to stakeholders in a timely manner, relating to requests received. A grievance registered by a particular stakeholder group requesting investigation into a gravesite was not immediately agreed to. The mine first responded with a letter asking for more

Requirement #	Requirement Text	Rating	Basis for rating
			information before continuing to investigate the grievance, justifying the delay, and then further providing an update on the status of the request in May 2021. Evidence from the site audit suggests that external stakeholders do not perceive that these processes are in place.
<b>Chapter 1.3—Human Rights Due Diligence</b>			
1.3.1.1.	<b>Critical</b> The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights	L	Evidence provided, supported by on-site interviews with managers demonstrates an implemented commitment (induction and training materials and Responsible Sourcing standard for Suppliers) to respect internationally recognized human rights.
1.3.1.2.	The policy shall: <ul style="list-style-type: none"> <li>a. Be approved at the most senior level of the company;</li> <li>b. Be informed by relevant internal and/or external expertise;</li> <li>c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project;</li> <li>d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders;</li> <li>e. Be reflected in the mining project's operational policies and procedures.</li> </ul>	L	Evidence provided indicates human rights policy, Code of Conduct and Social Way are signed off at the Group Level and available publicly on the Group website. Site staff are made aware of human rights policies during induction. Bullying, harassment, victimization, and anti-gender-based violence training has been rolled out. Some site departments have received voluntary principles and International Finance Corporation performance standards training. Site senior management have expressed their commitment to no violence against women and children. The Responsible Sourcing Standard reflects a commitment to human rights.  On-site interviews with workers, union representatives confirm the implementation of policies and programs to address sexual harassment of women and gender-based violence.
1.3.2.1.	<b>Critical</b> 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		Evidence provided indicates assessment of security and human right risks over a broad range (including gender-based violence, crime, contractors not adhering to government - mandated local spend and employment requirements) in the most recent Workplace Risk Assessment and Control and Layer 2 Issues-Based Risk Management (last updated 2019). Recent human rights risk identification


Requirement #	Requirement Text	Rating	Basis for rating
	business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.		has focused primarily on external security risks from on-going protests and road blockages. An updated Social and Human Rights Impacts and Risk Analysis based on newer group guidance (Social Way 3.0) is anticipated to be completed soon.
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> <ul style="list-style-type: none"> <li>a. Follow a credible process/methodology;</li> <li>b. Be carried out by competent professionals; and</li> <li>c. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders.</li> </ul>		Risk assessment completed according to Workplace Risk Assessment and Control methodology. An updated Social and Human Rights Impacts and Risk Analysis based on newer Group guidance (Social Way 3.0) and carried out by competent professionals is anticipated to be completed soon. On-site interviews indicate community members were not involved in the human rights impacts' identification, assessment, or mitigation (sub-section c). A Community Engagement Forum, including vulnerable groups, is planned.
1.3.2.3.	<p>As part of its assessment, the operating company shall document, at minimum:</p> <ul style="list-style-type: none"> <li>a. The assessment methodology;</li> <li>b. The current human rights context in the country and mining project area;</li> <li>c. Relevant human rights laws and norms;</li> <li>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;</li> <li>e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a</li> </ul>		Risk assessment methodology can be deduced from the outcome of the Workplace Risk Assessment and Control risk assessment completed. Risk assessments provide some human rights context but do not provide a comprehensive list of potential external and internal human right risks and controls. An updated Social and Human Rights Impacts and Risk Analysis based on newer group guidance (Social Way 3.0) and carried out by competent professionals is anticipated to be completed in the future. The Responsible Sourcing Standard and inclusion of human rights considerations in tendering process demonstrate some efforts to encourage human rights compliance by suppliers. On-site interviews confirmed that discussion of human rights focused primarily on bullying, harassment and victimization, gender-based violence and mine security concerns. Stakeholders and vulnerable groups have not participated in a broader analysis of human rights and their mitigation.

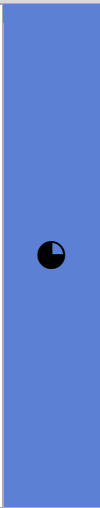
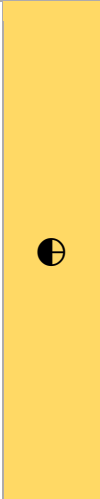
Requirement #	Requirement Text	Rating	Basis for rating
	<p>disaggregation of results by rights holder group;</p> <p>f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues.</p>		
1.3.2.4.	<p>At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them, and shall be consulted to provide feedback on those findings.</p>		<p>The evidence provided indicates that the site has policies and procedures in place and has undertaken some human rights analyses. A more thorough social and human rights impacts and risk analysis that may include monitoring and evaluation of suppliers will be completed in the future. The site has focused on Bullying, Harassment, and Victimization and Gender Based Violence and included community stakeholders in its campaigns. On-site interviews with managers and community groups indicate that broader discussions and stakeholder participation in identifying potential human rights impacts may be supported by the formation of a Community Engagement Forum.</p>
1.3.2.5.	<p>The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level.</p>		<p>The evidence provided indicates that several risk assessments have been undertaken that include some consideration of human rights and controls. Bullying, Harassment, and Victimization and Gender Based Violence and mine security have been the focus of implemented mitigations. On-site interviews suggest that other identified or potential human rights impacts and controls for risks (e.g., within the mine's contractor relationships) have not been given priority or integrated into the mine operations. An updated and broader based Social and Human Rights Impacts Risk Analysis has yet to be completed.</p>
1.3.3.1.	<p>Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights.</p>		<p>Interviews with managers and evidence provided indicate grievances are managed through an incident and grievance management procedure (provided). The procedure is advertised to the public in local newspapers and local bulletin boards and translated. This procedure includes directives to identify relevant human rights incidents / grievances.</p> <p>However, on-site interviews with community groups suggest limited use of available grievance mechanisms. Planned future formation of a Community Engagement Forum may assist in expanding access and use of the grievance procedure.</p>

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1.3.3.2.	<p>Responding to human rights risks related to the mining project:</p> <ul style="list-style-type: none"> <li>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).</li> <li>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.</li> <li>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.</li> </ul>		<p>Evidence provided for human rights impact and risk analyses, including controls. Limited evidence was provided to verify that controls have been implemented if human rights risks and potential impacts were identified. The site plans to undertake a more thorough Social and Human Rights Impact and Risk Analysis in the future. Evidence of mitigations being developed in consultation with stakeholders not provided.</p> <p>The site has developed and implemented a Contractor Management Procedure and a Responsible Sourcing Standard for Suppliers. The site monitors Contractor compliance with contract terms through a human rights compliance checklist. However, limited evidence was provided that potential human rights risks within the supply chain have been identified or mitigated.</p> <p>On-site interviews suggest a potentially unidentified human rights risks in the employee - contracted worker relationship (i.e. instances cited of intimidation and bullying) as well as a cited inability to exercise the right to freely associate by contract workers.</p>
1.3.3.3.	<p><b>Critical</b> Responding to actual human rights impacts related to the mining project:</p> <ul style="list-style-type: none"> <li>a. If the operating company determines that it has caused an actual human rights impact, the company shall: <ul style="list-style-type: none"> <li>i. Cease or change the activity responsible for the impact; and</li> <li>ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found</li> </ul> </li> </ul>		<p>Initial Assessment: The site has conducted some human rights impact and risk analyses. The site has developed and implemented a Contractor Management Procedure and a Responsible Sourcing Standard for Suppliers. The site monitors Contractor compliance with contract terms through a human rights compliance checklist. However, on-site worker interviews indicate a consistent pattern of discrimination between full-time employees of the operating company and contractors employed at the mine through its Business Partners. Contracted workers expressed an unwillingness to lodge grievances with respect to their working conditions or environment with their Business Partner employer because of anticipated non-action. Contract workers also cited the unidentified human rights risk of an inability to freely associate.</p>




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	<p>through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders;</p> <p>b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;</p> <p>c. If the operating company determines that it is linked to an actual human rights impact 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>		<p>A Grievance Report (Jan to May 2022) provided indicates that the grievance procedure is used by workers but does not provide a means to determine if employees and contracted workers use the procedure in equal proportion.</p> <p>The follow-up assessment indicated that there are still obvious disparities between Anglo American employees and contractor workers.</p> <p>- <u>Conditions of employment</u>: Contracted workers are not permanent full-time employees of the operating company and therefore may earn a lower wage and work under lower minimum standards of employment as per legal requirements (Basic Conditions of Employment Act) and not receive the full range of benefits afforded to Anglo American employees).</p> <p>- <u>Grievances</u>: The culture of inequality between Anglo American employees and contractor workers remains and includes poorer access to remedies by contractors. This is due to a persistent distrust in, and lack of response from, the grievance processes. In theory contractors allow staff to raise grievances through the provided means. The reality (according to at least three interviewees), is that grievances are not taken seriously (i.e., no response or feedback is given), actively ignored and /or not reported through formal means.</p> <p>There have been steps taken to ensure due diligence is carried out in terms of the supply chain. Including:</p> <p>1) Contractor Social Management strategy aims to ensure that contractors are implementing social safeguards within their contracts and within the community.</p> <p>2) Responsible Sourcing Standard for suppliers – which aims to ensure suppliers comply with all relevant laws, industry regulations, the organization’s policies, site requirements and supply conditions.</p> <p>3) SAP Fieldglass - This is an online system that assists contractors and service providers with onboarding and tracking against the contractor’s requirements.</p> <p>Other initiatives</p> <p>- “Culture in Action” is another initiative being put in place. This identified Human Rights influencers, who regularly go out into the operations and engage with workers and contractors to identify any potential issues and to spread the culture of safety, equality, and fairness within the works force. This started late in 2022.</p> <p>- Living with Dignity Hub provides support to the workforce in dealing with gender-based violence (GBV), sexual harassment, bullying, victimization, harassment, and domestic violence.</p>




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		—	<p>The above initiatives seem to be on the right path towards managing some of the disparities between Anglo American and contractor employees. It will, however, take a long time to change the culture of the operations, as this is a social context of South Africa.</p> <p>One of the issues identified was that contractor workers do not have the same access to the larger unions who work directly with Anglo American. As a result, contractor employees join smaller unions that are not as effective as the larger unions. The freedom of association is present; however, the effectiveness is not the same between Anglo American and contractor employees.</p> <p>A Human Rights Impact Assessment was conducted (Synergy, 19 May 2023). The Human Rights Impact Assessment found that there were six salient human rights impacts from the operations: two impacts are being directly caused by the operations, two impacts are being contributed to, and one is directly linked. Impacts identified in the assessment were broadly categorized into worker rights, gender-based violence, bullying, harassment and intimidation, distrust in access to remedy, impacts related to supply chain management (including unfair and unequal labor practices), and health.</p>
1.3.4.1.	The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.	⊕	Evidence provided indicates several risk assessments that have included human rights risks. There is evidence that on-going monitoring has taken place with respect to mine security risks, including some stakeholder involvement. A Mine Crime Combatting Forum meets periodically. Bullying, Harassment, and Victimization and Gender-Based Violence training has been provided to staff. A more thorough Social and Human Rights Impact and Risk Analysis is planned. The formation of a Community Engagement may provide future feedback on potential human rights risks and impacts. An Assurance Tracker provided, to be implemented in the future.
1.3.4.2.	External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being	—	<p>To the extent that human rights risks and impacts have been identified by Lifecycle Workplace Risk Assessment and Control and Issues-based Management processes there is no indication of repeated failure to prevent, mitigate or remediate actual human rights impacts. For this reason, external monitoring may not be relevant.</p> <p>However, on-site interviews suggest a potential human rights risk and impact in the employee - contracted worker workplace dynamic.</p>

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	<p>linked to any serious human rights abuse. Additionally:</p> <ul style="list-style-type: none"> <li>a. The company shall fund the external monitoring; and</li> <li>b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders.</li> </ul>		
1.3.5.1.	<p>The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts.</p>		<p>Evidence at Group level indicates that all sites undergo an 'intensive due diligence process' on human rights every quarter and external reviews twice a year. Site level evidence of external reporting provided is limited to potential mine security issues through a crime prevention forum. The site has also implemented a gender-based campaign with community participation. Formation of a Community Engagement may contribute to periodic external reporting in the future.</p>
1.3.5.2.	<p>If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations.</p>	—	<p>This requirement is considered not relevant. Until the site has issued site-level human rights due diligence reports, this requirement cannot be assessed. A Human Rights Impact Assessment was conducted (Synergy, 19 May 2023). See follow-up assessment in 1.3.3.3.</p>
1.3.5.3.	<p>Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization.</p>	—	<p>Until the site has issued site-level human rights due diligence reports, this requirement cannot be assessed. A Human Rights Impact Assessment was conducted (Synergy, 19 May 2023). See follow-up assessment in 1.3.3.3.</p>

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<b>Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy</b>			
1.4.1.1.	<p><b>Critical</b> 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>An appropriate grievance mechanism is in place and is accessible to internal and external stakeholders. Access is through multiple routes, namely phone call, email, post, online (Anglo anonymous hotline), SMS, WhatsApp and in-person (one-on-one or group meetings). The process is distributed in English and Sepedi and communicated at community and stakeholder meetings.</p> <p>An Incident management procedure is in place (V2 October 2019) with mechanisms to raise grievances and seek resolution. This has been communicated to stakeholders through training and publication in Sepedi and English in the Platinum Times and handed out as pamphlets.</p> <p>Engagement with workers and external stakeholders indicated that there was little knowledge of or easy access to the grievance procedure. The general perception was that either their grievances would not be taken seriously, or they would be targeted for raising grievances. No documentation of training of relevant personnel on the grievance mechanism. No documentation of any survey or review was carried out to evaluate the effectiveness of the grievance mechanism.</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"> <li>a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue;</li> <li>b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase;</li> </ol>		<p>Operation in the process of undertaking external consultation with stakeholders to co-design the grievance procedure as guided by United Nations Guiding Principles and co-develop monitoring mechanisms. The site's existing procedure is only partially in line with United Nations Guiding Principles. A procedure is in place for filing and reporting. No process or evidence provided related to sub-requirement "c". Anonymous grievances can be lodged through a third party and there is an allowance for anonymous grievance reporting in Project incident Management Procedure. Special groups (including women, early education, people with disabilities and Non-Governmental Organizations) have been set up to engage with for the Community Engagement Forum and Social and Labor Plan process. Little focus on communication with illiterate individuals. No other options for recourse are provided for in the Stakeholder Engagement Plan, although stakeholders are not prevented from obtaining legal or other recourse if required. Stakeholder Engagement Tracker is referred to in the Stakeholder Engagement Plan - and the Isometrix system is in place to track grievances raised.</p>

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	<ul style="list-style-type: none"> <li>c. How confidentiality of a complainant's identity will be respected, if requested;</li> <li>d. The ability to file anonymous complaints, if deemed necessary by stakeholders;</li> <li>e. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups;</li> <li>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</li> <li>g. How complaints and grievances and their resolutions will be tracked and recorded.</li> </ul>		
1.4.2.2.	The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available.	L	The site's Procedure is publicly available in Sepedi and English (Advertised in platinum times and on fliers) and training is provided. There is a documented grievance procedure in place, which is functional and open to all stakeholders to access. This has been communicated; however, evidence from external stakeholders suggests that it is not effective.
1.4.3.1.	No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse through other available mechanisms, including administrative, non-judicial or judicial remedies.	L	Social Way 3 Toolkit 3B makes clear that affected stakeholders should be provided with information on alternative mechanisms, both state and non-state based. It reiterates that Site-level grievance mechanisms are not a substitute for state-based mechanisms. Evidence of follow up letter to legal representatives for a stakeholder to demonstrate active engagement through legal channels and not site grievance mechanism alone. Evidence provided indicates that stakeholders make use of processes beyond the site grievance procedure and the site follows through with these external processes.
1.4.4.1.	Complaints and grievances and their outcomes and remedies shall be documented.	L	A comprehensive grievance register is kept and updated with registered grievances, a grievance reference number, date, nature of grievance, grievance summary, responsible party, severity, actions, status and closing comments. Responses to grievances and grievance process are further demonstrated


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			through acknowledgement letters to attorneys and response to former employees. Isometrix system provides a record of all grievances recorded and the process followed to resolve them.
1.4.4.2.	The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine: <ul style="list-style-type: none"> <li>a. If changes need to be made to improve its effectiveness as per 1.4.2.1.a;</li> <li>b. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and</li> <li>c. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights.</li> </ul>		The site intends to align to more rigorous monitoring and evaluation criteria as per the Social Way Toolkit 3B underway. Learning from the incident process incorporated in Project Incident Management Plan for Der Brochen, management indicated that they internally plan to prevent similar future incidents, but no evidence was available for Mototolo and broader complex. Der Brochen Project Incident Management Procedure includes identification of human rights impacts and management. The Isometrix (formerly Enablon) system also requires human rights incidents to be identified.
1.4.4.3.	Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism.		Advertising in the Platinum Times as well as the "open door" policy demonstrates opportunities to submit feedback. Engagement meetings with communities when requested to discuss issues with the process are provided for. Feedback on performance of grievance mechanism allowed, however method of communication may not reach majority of stakeholders.
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.		Advertisement in the Platinum Times and distribution of Grievance & Complaint pamphlets regularly demonstrate reasonable steps taken. However, more evidence is required to ascertain whether all stakeholders have this access (for example, illiterate/rural locations/language barrier). The General Manager is introduced at stakeholder meetings and the telephone numbers of the Social Performance team are provided to allow for verbal raising of issues.
1.4.5.2.	The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder		Provision is in place for escalation if the complainant is not satisfied including involvement of third parties (pg. 9 and 13 of incident management procedure). No suggestion in the documentation that use of the mine grievance mechanism waives rights to alternative resolutions. There is evidence that stakeholders have


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	from seeking redress through administrative, judicial or other non-judicial remedies.		used alternative redress mechanisms related to grievances and demonstrates there is no preclusion, as stated in the Incident Management Procedure.
1.4.5.3.	The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous.		Grievance management and procedures disclosed to site social performance team. Training presentations were provided as evidence to the auditors. No evidence of contractor or security staff training was provided, but there is a policy in place and incident management procedure provided to contractors.
1.4.6.1.	Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances.		Evidence of communication between mine and complainants (email, legal response letter to Attorneys show that responses are provided, and these are kept confidential. Demonstration of communication of grievance to specific stakeholders involved was observed.  Evidence was not provided that demonstrates grievance discussions with broader stakeholder groups periodically (e.g., meeting minutes).
<b>Chapter 1.5—Revenue and Payments Transparency</b>			
1.5.1.1.	The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime.		The Financial Statement and Tax and Economic Contribution Report support the claim that Anglo American complies with EU Accounting and Transparency directives. Anglo American state that they comply with UK legislation which implemented the EU Accounting and Transparency Directives, as well as adhering to the updated Global Reporting Initiative (GRI) transparency standards, and Australian voluntary Tax Transparency Code. Documents list all regulations complied with, show tax paid in all jurisdictions and include signed commitments by the board and senior leadership.

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1.5.1.2.	On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year.	—	Per IRMA guidance on this requirement, on the basis that Anglo American does voluntarily comply with European Union Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU) then this requirement is 'Not Relevant'.
1.5.1.3.	The types of payment disclosed shall include as a minimum, as applicable: <ul style="list-style-type: none"> <li>a. The host government's production entitlement;</li> <li>b. National state-owned enterprise production entitlement;</li> <li>c. Profits taxes;</li> <li>d. Royalties;</li> <li>e. Dividends;</li> <li>f. Bonuses, such as signature, discovery and production bonuses;</li> <li>g. License fees, rental fees, entry fees and other considerations for licenses and/or concessions;</li> <li>h. Payments for infrastructure improvements; and</li> <li>i. Any other significant payments and material benefits to government, including in kind payments.</li> </ul>	—	Per IRMA guidance on this requirement, on the basis that Anglo American does voluntarily comply with European Union Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU) then this requirement is 'Not Relevant'.
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.	L	Evidence provided relates to Anglo American Corporate tax strategy and lists payments made to some South African government bodies but not which mine they relate to. Mines are not considered "projects" for purposes of this requirement. The requirement does appear to be met at the National level.

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1.5.2.1.	The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below.	●	The site representatives state that they legally must comply with Chapter 10 of the European Union Directive 2013/34/EU. A statutory audit conducted by Price-Waterhouse-Coopers includes a statement of compliance with the EU requirement.. Publicly available 'tax and economic contribution reports' for 2021 and 2022 contained statements by Price-Waterhouse-Coopers that: "Since 1 January 2015, Anglo American has been subject to the project-by-project reporting requirements of the UK Reports on Payments to Government Regulations (SI 2014/3209) and Chapter 10 of the EU Accounting Directive (2013/34/EU). These rules require that the Group prepare and submit to Companies House, the UK registrar of companies, a full analysis of tax and certain other payments made to governments in respect of extractive projects on a project-by-project basis." This confirms the operating company's compliance with the requirement to make the specified reports, while making no statement about whether the content of the reports satisfies all the relevant requirements.
1.5.2.2.	The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public: <ul style="list-style-type: none"> <li>a. Mine production, disaggregated by product type and volume;</li> <li>b. Revenues from sales, disaggregated by product type;</li> <li>c. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department);</li> <li>d. Social expenditures, including the names and functions of beneficiaries;</li> <li>e. Taxes, tariffs or other relevant payments related to transportation of minerals;</li> <li>f. Payments to politicians' campaigns, political parties or related organizations; and</li> </ul>	—	The site makes no claims or explanation regarding what information at the mining project level is reported on an annual basis and is readily accessible to the public. Dis-aggregated revenue by metal type is reported at the Rustenburg Platinum Mines level only. Production volumes and many other revenue types are available on a mine-by-mine basis. Funding for political campaigns is not allowed. Fines and penalties are paid at Rustenburg Platinum Mines level and are not available for individual mines. However, none were reported directly in 2020. It is not known if these are rolled up into another metric or not. National-level activities, reportedly, Statutory audit conducted by Price-Waterhouse-Coopers includes compliance with European Union requirement. This requirement would therefore be considered "Not Relevant".

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	g. Fines or other similar penalties that have been issued in relation to the project.		
1.5.2.3.	The operating company shall publish annual accounts, following international accounting standards.	L	Evidence provided contains an independent auditor's report stating that Anglo American Platinum consolidated and separate financial position, consolidated and separate financial performance and its consolidated and separate cash flows are in accordance with International Financial Reporting Standards and the requirements of the Companies Act of South Africa.
1.5.3.1.	If the mining project is located in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website.	L	Anglo American demonstrates support for the EITI in several ways, including by publishing a clear public statement endorsing the EITI Principles on its external website.
1.5.3.2.	If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall: <ul style="list-style-type: none"> <li>a. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and</li> <li>b. Provide links on its external website to completed and up-to-date Company Forms for its operation, if the EITI implementing country has completed at least one validation.</li> </ul>	—	EITI is not active in South Africa. The site makes no claims or explanation regarding whether there is an alternative mandatory transparency regime, nor how the requirements of this criteria are met. No known alternative legal transparency regime. Numerous elements of transparency and good governance are associated with any listed/traded entity in South Africa. Evidence provided does confirm the company's commitment to supporting the Extractive Industries Transparency Initiative (EITI), both directly and as part of the International Council on Mining and Metals (ICMM). There was no evidence to show how the mine provides links to Company Forms for its operation. This requirement should therefore be considered Not Relevant.
1.5.4.1.	The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in	L	According to the site, this requirement is not applicable to the site and is more applicable to Anglo American corporate. There is a general mining regulation that addresses mineral rights. For individual mineral resources, the mine must submit a Mine Works Plan which lays out details of how the proposed exploitation will take place (what's the resource, how will it be mined, what infrastructure is required, what costs are anticipated and Add-on Social Labor

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	<p>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>Plan). There is a right under Section 18 of the Promotion for Access to Information Act (Act 2 of 2002) for the public to obtain access to mineral rights information. It is not known if the Mine Works Plan would also be made available. The Anglo American Platinum She policy will allow for provision of this information to public upon request provided as it is not confidential. Further discussion suggests that there is a "Right to Mine" permit and various other permitting requirements for the environment, etc. Mining Right is a public document and can be requested from authorities by anyone.</p>
1.5.4.2.	<p>The beneficial ownership of the operating company shall be publicly accessible.</p>	L	<p>Mototolo is 100% owned by Anglo American Platinum and therefore this point is not applicable. As the intent of the requirement is to ensure full transparency of ownership and Anglo American is known to be publicly traded, this would indicate the Mine is compliant with this criterion. Evidence was provided in Annual Report to confirm 100% ownership by Anglo American Platinum.</p>
1.5.5.1.	<p><b>Critical</b> The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.</p>	L	<p>An anti-bribery/anti-corruption policy is in place; this policy is verbally communicated to employees and contractors but is not provided in writing.</p>
1.5.5.2.	<p>Procedures shall include:</p> <p>a. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and</p> <p>b. Disciplinary actions to be taken if cases of bribery or corruption are discovered.</p>		<p>Relevant policies and standards address anti-bribery and corruption requirements at a high level but do not provide details of implementation for all of them. The Code of Conduct Training Course lays out disciplinary actions related to driving offences but does not describe actions related to corruption offences. Also, the course only addresses conflicts of interest but not all required anti-corruption measures. The draft Sustainable Mining Plan addresses ethical value chains and responsible supplier management but the Sustainable Mining Plan and supporting processes are not all fully developed or implemented.</p> <p>The 'Business Integrity Policy' states that "Employees, contractors and suppliers must report any breaches, or potential breaches of this Policy. Violations of this Policy will lead to disciplinary action in accordance with the Group disciplinary procedures. Disciplinary actions may involve sanctions up to and including summary dismissal.</p>

Requirement #	Requirement Text	Rating	Basis for rating
1.5.5.3.	Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.		<p>Training on the policy was reported to be included in employee induction training.</p> <p>Annual online training is required for personnel in decision-making positions. Training records showed that training is taking place. A Code Of Conduct course lays out several disciplinary actions related to various driving offences but does not describe actions related to corruption. Also, the course only specifically addresses conflicts of interest not all required anti-corruption measures. The draft Sustainable Mining Plan addresses ethical value chains and responsible supplier management but the Sustainable Mining Plan and supporting processes are not all fully developed or implemented - including associated training for contractors. The mine did not provide evidence to demonstrate whether related training had taken place for contractor personnel.</p>

## Principle 2: Planning for Positive Legacies

### RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

### Note on Chapter 2.1:


In October 2020, the IRMA Board approved changes in the way Chapter 2.1 was to be audited for existing mines.<sup>9</sup> The table below includes now shows where expectations are different for new versus existing mines. Existing mines are only required to meet a core set of requirements related to assessment of environmental and social risks (called CORE requirements), although existing mines have the option to be audited against the new mine requirements. If they have opted to do so, that will be reflected in the Basis for rating column. Existing mines are still required to have in place an environmental and social management system.

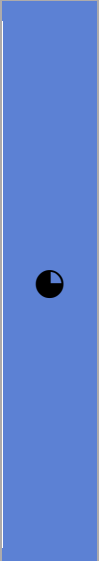
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<sup>9</sup> For more information, see the IRMA Guidance Note on Chapter 2.1: <https://responsiblemining.net/wp-content/uploads/2021/07/Chapter-2.1-ESIA-Guidance-Final-2020.pdf>

Requirement #	Requirement Text	Rating	Basis for rating
<b>Chapter 2.1—Environmental and Social Impact Assessment and Management</b>			
2.1.1.1	An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project.	L	An Environmental Impact Assessment, and Social Impact Assessment has been developed for Mototolo. As expansions across the mine (and shafts) take place, the Environmental Impact Assessment and Environmental Management Program's documents have been and continue to be updated and the necessary authorizations are applied for and received in line with the required legislation.
2.1.1.2.	To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken.	L	South African legislation dictates the timeous-ness with respect to the undertaking of the Environmental and Social Impact Assessment (ESIA) process. The site reported in stances where the design had been changed following the ESIA process, a review of the ESIA process will then take place to ensure all environmental & social components are adequately addressed.
2.1.1.3.	The ESIA shall be carried out in accordance with publicly available, documented procedures.	L	Adherence to the legislative requirements (As outlined in the National Environmental Management Act, Act 107 of 1998) was demonstrated during the impact assessment process.
2.1.2.1.	Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project.	L	The site provided all supporting documentation that announcement of the project was undertaken. Engagements with communities take place through the social performance teams and through stakeholder engagement days whereby each department shares the relevant information with the community liaison for that community.  The engagement with the communities takes place in the most spoken language of the area as well as in English. Translators are made available as and where required.
2.1.2.2.	Prior to the implementation of the ESIA process the operating company shall prepare a report and	L	Reports have been compiled by registered Environmental Assessment Practitioners, however, these reports and associated specialist studies have not

Requirement #	Requirement Text	Rating	Basis for rating
	<p>publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:</p> <ul style="list-style-type: none"> <li>a. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities;</li> <li>b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts;</li> <li>c. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and</li> <li>d. Contact details for the person or team responsible for management of the ESIA.</li> </ul>		<p>been published on the Anglo American Platinum website. South African legislative requirements do not require reports to be published on company websites, but the requirement for the reports to be made available to Interested and Affected Parties through various other public domains (including but not limited to the internet, public library, or the mining company reception area if possible and accessible). The Environmental and Social Impact reports and associated specialist studies (during application phase) were placed at strategic locations for Interested and Affected Parties to review and comment.</p> <p>The Environmental and Social Impact reports outline the process to be followed (including timelines and various approval steps). Furthermore, each report contains the contact details of the authors and the review team.</p> <p>The potential impacts and accompanying proposed mitigation actions are outlined in the Environmental and Social Impact Assessment (ESIA) reports. All ESIA's are managed by a registered Environmental Assessment Practitioner who needs to have certain requirements in place before they can be considered as a registered Environmental Assessment Practitioner.</p>
2.1.3.1.	<p><b>Critical (New Mines)</b> 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><b>Critical (Existing Mines)</b> The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental and social impacts associated with the mining operation.</p>	L	<p>Mototolo is an existing mine. The scoping report was completed in December 2006, when the mine was under the ownership of Xstrata Eastern Mines organization. As expansions across the mine (and shafts) take place, the Environmental Impact Assessment and Environmental Management Program's documents have been and continue to be updated and the necessary authorizations are applied for and received with respect to applicable legislation.</p>
2.1.3.2.	<p>During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as "stakeholders") who may be interested in and/or affected by the proposed project.</p>	L	<p>A stakeholder database has been established and is updated frequently to ensure all Interested and Affected Parties have been identified.</p>
2.1.3.3.	<p>Scoping shall include the consideration of:</p>	L	<p>As part of the Environmental Impact Assessment process, special studies (Environmental and Social) have also been undertaken, including a flora and</p>



Requirement #	Requirement Text	Rating	Basis for rating
	<p>a. Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure;</p> <p>b. Direct, indirect and cumulative impacts; and</p> <p>c. Potential impacts of extreme events.</p>		fauna study. Risks associated with extreme events such as Climate Change have been assessed and included as part of the recent update of the Environmental Impact Assessment and accompanying documentation.
2.1.3.4	<p>Scoping shall result in the identification of:</p> <p>a. Potentially significant environmental and social impacts of the proposed project;</p> <p>b. Alternative project designs to avoid significant adverse impacts;</p> <p>c. Other actions to mitigate identified adverse impacts; and</p> <p>d. Additional information and data needed to understand and assess the potential impacts.</p>	L	Mototolo is an existing mine. The Scoping report is compiled in line with the requirements of South African legislative framework. The 2006 scoping report addresses the potentially significant environmental and social impacts of the proposed project.
2.1.4.1.	Baseline data describing the prevailing environmental, social, economic and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project.	L	Specialists were appointed to undertake the various studies and assessments to compile Baseline Environmental and Social Impact data for the project. Baseline data is reflected in the Environmental Impact Assessment documentation for Mototolo and Der Brochen.
2.1.4.2.	Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA.	L	Additional studies including the wetland and Aquatic Study as well as the Fauna and Flora report have been undertaken. As expansions are identified, additional special studies are undertaken to identify risks early in the process. These specialist studies will include assessment of climate risks and actions that the mining company is considering.
2.1.5.1	The operating company shall:		The Environmental and Social Impact Assessment and Management was undertaken before IRMA requirements were implemented. Points a - c are

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>a. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping;</li> <li>b. Determine the significance of the predicted impacts;</li> <li>c. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the avoidance of impacts through consideration of alternative project designs; and</li> <li>d. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders.</li> </ul>		<p>addressed through the Impact Assessments that are undertaken before a project commences. It is not clear what mechanisms are in place to fully meet the requirements as outlined in point d.</p>
2.1.6.1.	<p>The operating company shall prepare an ESIA report that includes, at minimum:</p> <ul style="list-style-type: none"> <li>a. A description of the proposed mining project;</li> <li>b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts;</li> <li>c. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts;</li> <li>d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and</li> <li>e. Names and affiliations of ESIA authors and others involved in technical studies.</li> </ul>		<p>Requirements a, b, d, and e are included in the Environmental Management Programs and Environmental Impact Assessment documents. There is no evidence of existing mechanisms that are in place to fully meet requirements as outlined in point c (i.e., how concerns expressed by Stakeholders were taken into consideration during the Environmental Impact Assessment phase of the project).</p>

Requirement #	Requirement Text	Rating	Basis for rating
2.1.7.1.	The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine.	L	The site is ISO 14001:2015 and ISO 45001:2018 certified. Several mechanisms are in place to ensure that the mine demonstrates conformance to the requirements of ISO 14001 and ISO 45001. In addition, the mine has developed a Baseline Risk Assessment (outlining health, safety, environmental, social and community related risks) together with Job Hazard Analyses and Job Risk Analyses which provide for the identification and mitigation of hazards from activities with the potential to cause impacts.
2.1.7.2	An environmental and social management plan (or its equivalent) shall be developed that, at minimum: <ul style="list-style-type: none"> <li>a. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process;</li> <li>b. Assigns personnel responsible for implementation of various elements of the plan; and</li> <li>c. Includes estimates for the resources needed to implement the plan.</li> </ul>		In addition to the site's existing Integrated Management System, the site's Environmental Management Program is utilized to address the environmental and social aspects throughout the Life of Mine. Der Brochen Environmental Management Plan - Impacts identified per project phase and recommended mitigation measures is described on page 139 - 218. Evidence of implementation of mitigation appeared to be lacking. It was noted that actions are loaded with long timeframes/target dates having been extended.  Each mine has a Social and Labor Plan with specific actions and responsibilities assigned to personnel across the Complex. The mine was not able to provide supporting evidence which illustrates the various resources (people, budget, suggested timelines etc.) have been identified to implement the Environmental and Social plans.
2.1.7.3.	The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information.		Internal and external audits are undertaken by the mine in line with the actions outlined in the Environmental Management Plan and the Social and Labor Plan. All actions are loaded in Isometrix and assigned to a specific responsible person.  No evidence was made available to confirm that the required Environmental and Social management plans are periodically updated based on monitoring results
2.1.8.1.	As part of the ESMS, the operating company shall establish a program to monitor: <ul style="list-style-type: none"> <li>a. The significant environmental and social impacts identified during or after the ESIA process; and</li> </ul>		Program to manage significant environmental and social impacts identified in the Environmental and Social Impact Assessment is managed through the environmental management plan and Social and Labor Plan. Audits are undertaken internally and by external parties. These audit reports are then submitted to the regulator for their comments and review.

Requirement #	Requirement Text	Rating	Basis for rating
	b. The effectiveness of mitigation measures implemented to address environmental and social impacts.		For the Social and Labour Plan, the regulator (following the review/comment period) would provide comments on the effectiveness of the mitigation measures to address any environmental and social impacts identified. The mine does not undertake effectiveness exercises on corrective actions that have been implemented.
2.1.8.2.	The monitoring program shall be designed and carried out by competent professionals.	L	The site reported that the audits are undertaken internally by appropriately competent employees (qualification and years of experience in the field) and externally by Environmental Assessment Practitioners (who are required to demonstrate competency through assessments and evidence of working experience).
2.1.8.3.	If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project.	⊕	To date, no requests for independent monitoring of key impact indicators have been requested by stakeholders. It is unclear what mechanisms are in place to address independent monitoring.
2.1.9.1.	<p><b>(New Mines)</b> As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:</p> <ul style="list-style-type: none"> <li>a. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3);</li> <li>b. Methodologies for the collection of environmental and social baseline data (see 2.1.4);</li> <li>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);</li> <li>d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c);</li> <li>e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and</li> </ul>	L	Mototolo is an existing mine. A comment and response report (part of the draft Environmental Impact Assessment / Environmental Management Programs) emphasizes that engagement of all interested and affected parties. The Background Information Document (BID) for the Der Brochen project was reviewed. The report outlines mechanisms in place for any Interested and Affected Parties participating in the Environmental and Social Impact Assessment process.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>f. The final conclusions and recommendations of the ESIA (see 2.1.6.1).</p> <p><b>(Existing Mines)</b> The operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine</p>		
2.1.9.2.	<p><b>(New Mines)</b> 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><b>(Existing Mines)</b> 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>	●	Evidence of the mine encouraging the stakeholder engagement process was shared. Stakeholder engagement days are scheduled which allow for meaningful engagement with the stakeholders outside of the Environmental and Social Impact Assessment process. In addition, South African legislation outlines the Environmental and Social Impact Assessment process in detail and authorization/approval for continuation of the project may not be granted if public participation process is not fully completed.
2.1.9.3.	The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and social monitoring program.	L	Stakeholder consultation is a regulated process in South Africa as part of the Environmental Impact Assessment process. Comprehensive process regarding stakeholder engagement is evident, no comments have been received from stakeholders on the scope and design of the environmental and social monitoring program.
2.1.9.4.	The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program.	●	<p>Evidence is available to support stakeholders requesting access to reports. From 2019 to the present, no feedback has been received from Stakeholders regarding comments on the content in the environmental and social monitoring program.</p> <p>Stakeholders are encouraged to provide inputs in order to improve the existing Environmental and Social monitoring programs, however, little to no inputs are provided from the stakeholders.</p>

Requirement #	Requirement Text	Rating	Basis for rating
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.		No comments received, even though the report contains recommendations. Action plan formulated (internally) but has not been shared with stakeholders. Reportedly, all community related comments are managed through Stakeholder Engagement.
2.1.10.1.	<b>(New Mines)</b> 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. <b>(Existing Mines)</b> At minimum, a summary of the significant environmental and social impacts and risks associated with the mining operation shall be made public	L	Mototolo is an existing mine. Proof of the advert that was made available to the public (together with the localities as to where the Environmental and Social Impact Assessment document is available) was shared with the audit team. During social engagement sessions arranged by the Social Performance team, the communities are informed of the relevant Environmental and Social Impact Assessments and accompanying management plans. The social engagement sessions are held in different languages applicable in the area.
2.1.10.2.	The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account.	L	South African legislation at the time of publication of the Environmental Impact Assessment required details of stakeholders to be documented unless the stakeholders explicitly stated their wish to remain anonymous. No requests have been received which illustrate that some stakeholders have wished to remain anonymous.
2.1.10.3.	The environmental and social management plan shall be made available to stakeholders upon request.	L	The updated Safety, Health, and Environment policy does include how the mine will intend on making relevant environmental information available to stakeholders when requested. All requests regarding the Environmental Management Program are made available via the Stakeholder Engagement Office. Evidence was shared by email, together with responses provided to Interested and Affected Parties.
2.1.10.4.	Summary reports of the findings of the environmental and social monitoring program shall		Evidence of the reports (having been uploaded) were verified on the Anglo American Platinum website as per the link below:



Requirement #	Requirement Text	Rating	Basis for rating
	be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available.		<a href="https://www.angloamericanplatinum.com/sustainability/environmental-compliance-audits">https://www.angloamericanplatinum.com/sustainability/environmental-compliance-audits</a> The methodologies related to the Environmental and Social monitoring is not fully incorporated into the reports that are published online.
2.1.10.5.	<b>(New Mines)</b> The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means. <b>(Existing Mines)</b> The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means.	L	Mototolo is an existing mine. The site's Safety, Health and Environment Policy specifies that relevant environmental and social information will be made available upon request. No requests have come through to the mine requesting access to the Environmental and Social Management system documentation.
<b>Chapter 2.2—Free, Prior and Informed Consent (FPIC)</b>			
	Chapter Not Relevant		While the Company has an applicable Indigenous Peoples policy which considers Free Prior Informed Consent, no Indigenous Peoples meeting the International Finance Corporation definition were identified. Collectively Indigenous Peoples in South Africa are known as Khoi -San but have not been formally recognized by national legislation. Koi-San are located primarily in the Western, Eastern and Northern Cape Regions and are therefore at some considerable distance from the site. The Khoi San have not claimed Indigenous rights in the site's area of influence. For these reasons, Chapter 2.2 Free Prior Informed Consent was considered Not Relevant.
<b>Chapter 2.3—Obtaining Community Support and Delivering Benefits</b>			
2.3.1.1.	The operating company shall publicly commit to: a. Maintaining or improving the health, social and economic wellbeing of affected communities; and		Programs and commitments to health/socio-economic wellbeing of affected communities included in the Social and Labor Plan - a publicly disclosed document. The mine has a few policies in place, and as part of the Anglo American group, there is an overall commitment to social wellbeing. However, there is no clear statement that Mototolo is committed to maintaining or

Requirement #	Requirement Text	Rating	Basis for rating
	b. Developing a mining project only if it gains and maintains broad community support.		improving the health, social and economic wellbeing of affected communities. There were instances of expressions of dissatisfaction from local communities in terms of health impacts and lack of benefits from the mine. Documented evidence shows broad community support received when undertaking operational activities.
2.3.2.1.	For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained.	—	The Mototolo Complex is an existing operation.
2.3.2.2.	<p>For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support:</p> <ul style="list-style-type: none"> <li>a. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project;</li> <li>b. Was transparent;</li> <li>c. Was free from coercion or manipulation; and</li> <li>d. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution.</li> </ul>	—	The Mototolo Complex is an existing operation.
2.3.2.3.	For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.	●	There appears to be general support for the mine operations, as evidenced in letters of appreciation and support received on projects for doorstep communities.

Requirement #	Requirement Text	Rating	Basis for rating
			<p>Although protests and grievances are raised regularly, these are not always aimed solely at the site, as the complexity of the local context means that impacts of other mining companies in the area and poor municipal services are often transposed onto the site, as it is owned by a multi-national company and are more likely to respond. . The mine is actively working in and with communities to maintain support for its operations. Feedback from external stakeholders indicates that they are not entirely satisfied with the outcomes of several processes, but, as stated above, this may be due to external factors and not solely due to a lack of effort from the mine. For example, intra-community conflict and competition for leadership positions and mine benefits in local communities has resulted in dissatisfaction with decisions or outcomes of grievances, as they may not suit all community members. In other words, political and social structures play a role in the dissatisfaction.</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 contributions to community development initiatives and benefits in affected communities.</p>	⊕	<p>The Social and Labor Plan, and the Socio-Economic Development Plan are the main planning frameworks to guide community development in the affected communities. Engagement minutes demonstrate that collaboration on strategies on community development are discussed in detail with stakeholders including the department of social development, the Thaba Chweu Local Municipality, Communal Property Associations, neighboring farms, community trust members and tribal authorities.</p> <p>External stakeholders indicated that there was no substantial engagement and little communication with the mine on developing processes or initiatives (perceived as a top-down approach). It is also noted that the stakeholder engagement context of the site is very complex, and therefore perceptions of engagement may be distorted by external factors, such as community leadership, intra-community conflict, and impacts of other (neighboring) mining operations.</p>
2.3.3.2.	<p>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>	⊕	<p>Planning process for engagements accounts for a broad spectrum of stakeholders, including vulnerable. All engagement, including Socio-economic development, and community development planning is guided by the operations Stakeholder Engagement Plan / Social Way Toolkit 3A. The Stakeholder Engagement Plan outlines engagement process that is “inclusive, enables participation and creates sustainable relationships”. Section 6 and table 8.1 of the Stakeholder Engagement Plan identifies vulnerable stakeholders,</p>

Requirement #	Requirement Text	Rating	Basis for rating
			<p>including women, youth and employees of Business Partners, their primary issues, and concerns and how they should be engaged to ensure participation. Engagement with vulnerable groups through special group meetings for Social and Labor Plan &amp; Community Engagement Forum development (including youth, elderly, Non-Governmental Organizations, disabilities); however, the Community Engagement Forum has not been established yet, and there are no Terms of Reference for engagement. External Stakeholder indicated that they perceived that the mine is not transparent in their communications, and although people may be engaged it is not inclusive or comprehensive.</p>
2.3.3.3.	<p>If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process.</p>	L	<p>Provision of evidence, including meeting minutes, approval of funding letter or request for engagement specialist from community required. Anglo has assisted with establishing a community trust including families affected by the Der Brochen project, together with the local municipality, to assist them in specific issues related to their land and cultural heritage. This is documented in the Stakeholder Engagement Plan, and court document. Budget is made available for providing support to communities, but no such requests have been presented to the mine.</p>
2.3.3.4.	<p>Efforts shall be made to develop:</p> <ul style="list-style-type: none"> <li>a. Local procurement opportunities;</li> <li>b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and</li> <li>c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations).</li> </ul>	●	<p>a. and b. Clear demonstration of local procurement opportunities through the Zimele Program (inclusive procurement report), which also demonstrates intent to include broader community including vulnerable women, men, and children. Community capacity building through mini-MBA, Social and Labor Plan programs that will help to sustain communities after closure. Sustainable Mining Plan (5-year program) with clear deliverables re employment creation tracks over time the levels community health and safety, employment, water, energy, reduction of dust and noise etc., and to create 5 additional jobs outside of mining for every 1 mining job created, and every school should be operating as at least in the top 30% of best performing schools in the country by 2030. By 2030, will address 30% of community health issues identified in the baseline.</p> <p>c. Socio-economic projects and programmes are aimed at being self-sustaining, however this does not always occur, due to lack of continuity and ownership, either within the communities or from local government. The site does aim to build capacity, however the lack of take up form communities and poor basic education levels affect the sustainability of implemented projects.</p>

Requirement #	Requirement Text	Rating	Basis for rating
2.3.3.5.	The planning process and any outcomes or decisions shall be documented and made publicly available.	L	Social and Labor Plan and Socio-Economic Development planning / decisions / outcomes are frequently shared publicly in engagement feedback sessions. External stakeholders indicated that there is a perception that there is not enough information shared with stakeholders and a general lack of transparency from the mine.
2.3.3.6.	In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements.	⊗	Monitoring and evaluation indicators determined by South African standards and legislation. Minimal integration of community inputs into actual indicators. Interview indicated that Monitoring & evaluation is not in place fully (other than through the Social and Labor Plan), The socio-economic development Roadmap will implement this comprehensively once in place. Monitor community benefits through the Sustainable Mining Plan and periodic engagements with communities. Detailed monitoring and evaluation will be completed through implementation of the socio-economic development roadmap, and through the Community Engagement Forum.
<b>Chapter 2.4—Resettlement</b>			
	Chapter Not Relevant		No resettlement has taken place at the Mototolo Complex to date.
<b>Chapter 2.5—Emergency Preparedness and Response</b>			
2.5.1.1.	<b>Critical</b> All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in <i>United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)</i> for Mining.	●	Evidence presented confirms that Mototolo Complex has a sophisticated approach to development of emergency preparedness plans that meet many but not all the requirements of the UN Awareness and Preparedness for Emergencies at the Local Level for Mining. A plan is underway to revise any of the related plans and communicate them to relevant stakeholders to meet all Awareness and Preparedness for Emergencies at the local level requirements. Specific gaps are related to helicopter landing pad (managed by Corp aviation

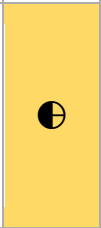



Requirement #	Requirement Text	Rating	Basis for rating
			<p>department) Contract with Netcare 911; and media communication - which is managed through Anglo American Platinum media relations department.</p> <p>Site Observations: On-site observations and interviews confirmed that emergency response plans were implemented at the mine. There were indications that communication to community groups could be better - although community members reportedly seemed to be more interested in other day-to-day concerns.</p>
2.5.1.2.	<p>The operating company shall:</p> <ul style="list-style-type: none"> <li>d. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and</li> <li>e. Update the communications contacts of the emergency response plan at least annually.</li> </ul>		<p>Evidence presented confirms that Mototolo Complex conducts a variety of drills on a regular basis. Additional required drills, including those involving communities and other external stakeholders have been planned (as of Stage 1). Many (but not all) were completed by the Stage 2 assessment. There were plans for regularly scheduled drills in place, but second and subsequent rounds of training have not yet begun. Conducted Maresburg Tailings Storage Facility failure simulation.</p> <p>Communications contacts are being updated as part of the recent revision campaign and will be reviewed/updated at least annually.</p>
2.5.2.1.	<p><b>Critical</b> 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>Evidence presented confirms that Mototolo Complex has scheduled emergency response workshops with doorstep communities in Quarter 2 of 2021. Awareness campaigns have already started.</p> <p>Update at Stage 2. Completed initial workshops with all potentially affected communities. Followed up with awareness sessions.</p> <p>Site Observations: On-site observations and interviews confirmed that various interested parties had been contacted for input as part of the development of emergency response plans. Evidence of strong community engagement was lacking but it was noted that local communities frequently failed to respond to topics, such as this, that were not of immediate concern to them.</p>
2.5.3.1.	<p>All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events.</p>	<p>L</p>	<p>The evidence provided confirms that Mototolo Complex has had liability insurance cover in place continuously for multiple years. This showed a pattern of continued insurance and interviewed personnel confirmed that insurance was in place at the time of the Stage 2 site visit.</p>


Requirement #	Requirement Text	Rating	Basis for rating
2.5.3.2.	The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others.	L	Evidence provided confirms that Anglo American Platinum has liability insurance that covers General Liability, Pollution Liability, other Liabilities and has had other business-related insurance coverages in place continuously for multiple years. There doesn't appear to be any listed exclusions for the criteria requirements.
2.5.3.3.	The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property.	—	Publicly available information shows that Anglo American Platinum has been a 50% owner of Mototolo for many years and obtained 100% ownership in 2018. Therefore, this requirement is not relevant because there has been no change in the ownership of the mining project..
<b>Chapter 2.6—Planning and Financing Reclamation and Closure</b>			
2.6.1.1.	The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company.	L	Reclamation and closure plans for rehabilitation and exploration are covered in the Mine Closure Plans and the Closure Cost Liability Assessments, which are updated annually.
2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.	L	At the time of the assessment, a draft Mine Closure Plan was made available for review and rehabilitation related to exploration had been included in the draft plan. . During surveillance, further assessments will be undertaken to evaluate implementation and any recent updates to the Mine Closure Plans.
2.6.1.3.	Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4).	L	Examples of exploration-related requests have been submitted in the form of additional road upgrades, which created employment for the nearby communities. The community is then appointed, and the road grading is then completed, thus making it safe for all to use.  Historically, complaints have been addressed verbally. However, since the social performance team has been established (past 3 years), all complaints and grievances are managed through the Social Performance department who

Requirement #	Requirement Text	Rating	Basis for rating
			then passes the grievance or complaint to the relevant department for rectification.
2.6.2.1	<p><b>Critical</b> 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>Prior to the mine being acquired by Anglo American Platinum, the required rehabilitation and closure plans were compiled and submitted in accordance with the relevant legislation at the time. These have since been revised/updated accordingly (in line with the required legislation – National Environmental Management Act Financial Provisioning Regulations).</p> <p>Like the closure cost liability assessment, the update of the Mine Closure Plan for Mototolo complex is underway.</p>
2.6.2.2	<p>At a minimum, the reclamation and closure plan shall contain:</p> <ol style="list-style-type: none"> <li>a. A general statement of purpose;</li> <li>b. Site location and background Information;</li> <li>c. A description of the entire facility, including individual site features;</li> <li>d. The role of the community in reviewing the reclamation and closure plan;</li> <li>e. Agreed-upon (after-ESIA) post-mining land use and facility use;</li> <li>f. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure;</li> <li>g. Source mitigation program to prevent the degradation of water resources;</li> <li>h. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization;</li> <li>i. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable;</li> <li>j. Earthwork:</li> </ol>	●	The draft Mine Closure Plan (June 2022) is still being finalized.

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>i. Stabilization and final topography of the reclaimed mine lands;</li> <li>ii. Storm water runoff/run-on management;</li> <li>iii. Topsoil salvage to the maximum extent practicable;</li> <li>iv. Topsoil storage in a manner that preserves its capability to support plant regeneration;</li> <li>k. Revegetation/Ecological Restoration: <ul style="list-style-type: none"> <li>i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use;</li> <li>ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time;</li> <li>iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed;</li> <li>iv. Measures for control of noxious weeds;</li> <li>v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6);</li> </ul> </li> <li>l. Hazardous materials disposal;</li> <li>m. Facility demolition and disposal, if not used for other purposes;</li> <li>n. Long-term maintenance;</li> <li>o. Post-closure monitoring plan;</li> <li>p. The role of the community in long-term monitoring and maintenance (if any); and</li> <li>q. A schedule for all activities indicated in the plan.</li> </ul>		
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	⊕	Similar to the Mine Closure Plan, which is still in draft, it is understood that the Closure Cost Liability Assessment is also in the process of being revised so that both are in alignment.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>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"> <li>a. Mobilization/demobilization;</li> <li>b. Engineering redesign, procurement, and construction management;</li> <li>c. Earthwork;</li> <li>d. Revegetation/Ecological Restoration;</li> <li>e. Disposal of hazardous materials;</li> <li>f. Facility demolition and disposal;</li> <li>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"> <li>i. Interim process water and site management; and</li> <li>ii. Short-term water treatment;</li> </ul> </li> <li>h. Post-closure costs for: <ul style="list-style-type: none"> <li>i. Long-term water treatment; and</li> <li>ii. Long-term monitoring and maintenance;</li> </ul> </li> <li>i. Indirect Costs: <ul style="list-style-type: none"> <li>i. Mobilization/demobilization;</li> <li>ii. Engineering redesign, procurement and construction management;</li> <li>iii. Contractor overhead and profit;</li> <li>iv. Agency administration;</li> <li>v. Contingency; and</li> </ul> </li> <li>j. Either: <ul style="list-style-type: none"> <li>i. A multi-year inflation increase in the financial surety; or</li> <li>ii. An annual review and update of the financial surety.</li> </ul> </li> </ul>		

Requirement #	Requirement Text	Rating	Basis for rating
2.6.2.4.	The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report.		According to the site, the Mine Closure Plan is updated on a 3-year frequency and the closure cost estimates are updated annually. At the time of the Stage 2 assessment (and finalization of the IRMA assessment report) the Mine Closure Plan was still in draft (June 2022) and in the process of being finalized.
2.6.2.5.	If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally: <ul style="list-style-type: none"> <li>a. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and</li> <li>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.</li> </ul>		<p>Provided evidence indicated that there is a stakeholder outreach process, including public participation, in which no comments relating to reclamation were received.</p> <p>Evidence stated that a scoping report and environmental impact assessment will be made available for comment for a period of 30 days each (rather than the 60 days required in the criteria.)</p> <p>South Africa's legislative framework timelines allow for 30 days review for the scoping and impact reports, respectively. It is practically not possible for comment periods to be extended outside of the time frames as enforced by the regulator.</p>
2.6.2.6.	<b>Critical</b> The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request.		The site's recently updated Safety, Health, and Environment Policy outlines the approach that would be followed should stakeholders request any "environmental related information." Closure planning and provisioning is included as part of the environmental impact assessment process (whereby the document is made publicly available). In addition, in the published annual sustainability report, cost provisioning for closure is included.
2.6.3.1.	Open pits shall be partially or completely backfilled if:		

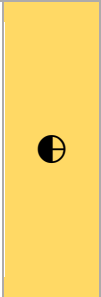

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>a. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and</li> <li>b. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and</li> <li>c. It is economically viable.</li> </ul>		No pit lake is predicted to form; however, the post-closure monitoring plan will include pit lake water quality testing should pit lake formation occur.
2.6.3.2.	<p>Underground mines shall be backfilled if:</p> <ul style="list-style-type: none"> <li>a. Subsidence is predicted on lands not owned by the mining company; and</li> <li>b. If the mining method allows.</li> </ul>	—	This requirement is not relevant as subsidence is not identified as a risk for the mines; hence, it has not been assessed.
2.6.4.1.	<b>Critical</b> Financial surety instruments shall be in place for mine closure and post-closure.	L	Evidence of surety instruments in the form of guarantees is in place for Mototolo.
2.6.4.2.	<p>Financial surety instruments shall be:</p> <ul style="list-style-type: none"> <li>a. Independently guaranteed, reliable, and readily liquid;</li> <li>b. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan;</li> <li>c. In place before ground disturbance begins; and</li> <li>d. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed.</li> </ul>		Financial provision has been provided against the closure liability of the entire Mototolo operation in the form of a rehabilitation trust fund and financial guarantees that a financial audit is undertaken for financial provision every year.
2.6.4.3.	Self-bonding or corporate guarantees shall not be used.	L	Self-bonding or corporate guarantees are not used as financial surety instruments for the mining project. Financial provision is against the closure liability of the entire complex in the form of a rehabilitation trust fund and financial guarantee and not in the form of a self-bond or corporate guarantee.

Requirement #	Requirement Text	Rating	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.	L	The updated Safety, Health, and Environment Policy does include how the mine intends to make relevant environmental information available to stakeholders when requested. No requests have been put forward to the mine thus far.
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"> <li>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.</li> <li>b. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and</li> <li>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.</li> </ul>	L	<p>Supporting documentation made available did not confirm that the public has or would be provided with 60 days to comment on financial surety prior to renewal or release. Supporting documents also do not confirm a policy to provide communities and stakeholders the opportunity to propose independent experts to review the financial surety.</p> <p>Available documents indicate that if requested by stakeholders, the operating company will provide resources for capacity building and training to enable meaningful stakeholder engagement.</p>
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"> <li>a. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and</li> </ul>	L	This is a regulated process administered by the South African National Department of Mineral Resources and Energy, and funds will not be released without adequate verification from the regulator.

Requirement #	Requirement Text	Rating	Basis for rating
	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"> <li>a. Inspection of surface (open pits) and underground mine workings;</li> <li>b. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and</li> <li>c. Mechanisms for contingency and response planning and implementation.</li> </ul>	⊗	Commitment to post-closure monitoring was made available in draft format. It is noted that not all the required specifications were included.
2.6.5.2.	Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance.	⊕	<p>Groundwater monitoring has taken place at the facility during operation and the groundwater model is updated every 2 years.</p> <p>Evidence provided demonstrates that the mine has established monitoring locations for each source of treated or untreated contaminants and is conducting monitoring of surface and groundwater. At the time of the Stage 2 on site assessment, the Mine Closure Plan (June 2022) was still in draft. The post-closure monitoring plan will include provisions for protecting people, wildlife, livestock, birds, or agricultural uses if pit lake water quality is predicted to pose a risk to these organisms.</p>
2.6.5.3.	Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface	⊗	<p>The evidence provided confirms that post-closure monitoring of surface water and groundwater will continue for 10 - 15 years.</p> <p>A mine closure plan still in draft and full assessment of this requirement could not be finalized.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	or ground waters is occurring or will occur, respectively.		
2.6.5.4.	Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources.	L	Provided evidence confirms that post-closure monitoring plans include biologic monitoring, (i.e., aquatic biodiversity studies and post-closure monitoring to be undertaken for 10 years (or as required)).
2.6.5.5.	If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds, or agricultural uses, adequate measures shall be taken to protect these organisms.	—	Mototolo is an underground operation and therefore no pit is expected to form. The response is marked as Not Relevant.
2.6.6.1.	<p>Long-term water treatment shall not take place unless:</p> <ul style="list-style-type: none"> <li>a. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and</li> <li>b. The operating company funds an engineering and risk assessment that: <ul style="list-style-type: none"> <li>i. Is carried out by an independent third-party;</li> <li>ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods;</li> <li>iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms;</li> <li>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</li> </ul> </li> </ul>	●	<p>According to the site, a groundwater contamination plume associated with the Helena Tailings Storage Facility is the primary pollution concern in relation to this criterion. This plume is anticipated to be contained and treated to closure before the remaining life of the facility. The Maresburg Tailings Storage Facility is being managed to prevent similar groundwater impact.</p> <p>Evidence provided confirms the above is in accordance with the Anglo American water management standard and that a gradual change of seepage concentrations dominated by process water (tailings liquor) to seepage dominated by the interaction between infiltrating rainwater and the benign solid tailings matrix (essentially equal to background sulphate concentrations) is expected.</p> <p>Based on assertions made by site personnel, a Geohydrological Model was planned for completion in 2022.</p> <p>There is no confirmation that the environmental advantages/disadvantages of long-term water treatment versus other mitigation methods have been evaluated; no data on the failure rates of the proposed mitigation measures and water treatment mechanisms; no determination of risk to human health and communities and no consultation with stakeholders.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion.		
2.6.6.2	If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated.	⊕	<p>According to the site, a long-term plan is not yet considered as an option. Plume interception will be done for the next 30 years at the Helena Tailings Facility, whereby the mine intends to capture the seepages and then pump it back into the return water dam for reticulation.</p> <p>Provided evidence confirms that this is in accordance with the Anglo American water management standard where progressive mineral residue facilitates seepage interception. Surface contact water containment and clean water diversions will be optimized and managed during the operational phase, in accordance with the Water Management Plan, to mitigate post-closure water management risks.</p> <p>The company is taking actions now to minimize the volume of water that may eventually require treatment (if not eliminating it altogether). However, there is limited evidence to show that all options have been considered at this stage.</p>
2.6.7.1.	The operating company shall provide sufficient financial surety for all long-term activities, including: mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company's finances at the time of mine closure or bankruptcy.	⊖	<p>Estimated closure and rehab costs have been determined but do not address the criteria requirement for post-closure financial surety.</p> <p>Evidence reviewed in support of other assessed criteria indicates that the operating company has significant financial surety arrangements for closure and post-closure but did not confirm that they meet all the detailed requirements.</p> <p>This is a regulated process administered by the South African National Department of Mineral Resources and Energy, and funds will not be released without adequate verification from the regulator.</p>
2.6.7.2.	If long-term water treatment is required post-closure: a. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on	⊕	The mine has indicated this requirement to be not relevant, presumably on the basis that long-term water treatment will not be required post-closure. A mine closure plan is still in draft and full assessment of this requirement could not be

Requirement #	Requirement Text	Rating	Basis for rating
	<p>treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and</p> <p>b. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded.</p>		<p>finalized. The need for post-closure water treatment is an ongoing possibility so the requirement should be applicable.</p>
2.6.7.3.	<p>The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety.</p>		<p>According to the site, independent consultants do evaluate the provisions. The Rehabilitation and Closure Plan provided as evidence for other criteria requirements includes financial surety estimates prepared by a contracted outside company, but there is no evidence to confirm that this meets the requirement for the criteria.</p> <p>The evidence provided consists of a financial guarantee and does not confirm that independent analysis is carried out at the same time as the reclamation financial surety.</p>
2.6.7.4.	<p>Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:</p> <p>a. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and</p> <p>b. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US \$10.00 or less (or its equivalent in other currencies).</p>		<p>A conservative approach in line with acceptable and recognized accounting practices has been considered for post-closure financial surety. The entity holding the financial surety has documented that higher interest rates can be achieved in the long term; however, there is no confirmation whether the eventual calculation results in a real interest rate above or below requirements as outlined in the IRMA Standard.</p> <p>The supplied evidence is highly technical in nature, and while it strongly implies a conservative approach in line with accepted accounting practices, it does not specifically confirm whether the eventual calculation results in a real interest rate above or below the 3% specified in the IRMA Standard.</p>






## Principle 3: Social Responsibility—APPENDIX

### RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant


Requirement #	Requirement Text	Rating	Basis for rating
Chapter 3.1—Fair Labor and Terms of Work			
3.1.1.1.	The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law.		Evidence provided, supported by interviews with workers and union representatives, indicates that human resource policies have been adopted to manage workers.
3.1.2.1.	<b>Critical</b> The operating company shall respect the rights of workers to freedom of association and collective bargaining.		Recognition and wage agreements were provided. On-site interviews with union representatives and workers confirm the operating company's respect for worker's rights to freedom of association and collective bargaining.  However, interviews with contracted workers employed by Business Partners indicate unionization is discouraged.
3.1.2.2.	Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative		National law does not restrict the freedom of association.

Requirement #	Requirement Text	Rating	Basis for rating
	mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms.		
3.1.2.3.	The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner.	●	Evidence provided, supported by on-site interviews with union representatives, indicates regular meetings are held between unions and management, with adequate information shared in a timely manner for negotiations.
3.1.2.4.	Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers' representatives at fly-in/fly-out or other remotely located mine sites, where relevant.	L	Evidence provided and interviews with managers indicate that facilities are provided by the operating company for union business. On-site interviews with union representatives confirm space is made available for unions to conduct related business with workers.
3.1.2.5.	The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike.	●	Documents provided indicate management respect for the unionization process and legal strikes by site management, including non-interference with a picket and non-intimidation of participants. On-site interviews with workers and union representatives recall a strike in 2019. While issues remain between management and unions, there was no indication the operating company acted to undermine worker representation.
3.1.2.6.	Upon employment, the operating company shall: <ul style="list-style-type: none"> <li>a. Inform workers of their rights under national labor and employment law;</li> <li>b. Inform workers that they are free to join a workers' organization of their choosing without</li> </ul>	●	Induction materials and recognition agreements with unions were provided. On-site interviews with managers, workers and union representatives confirm that employees are aware of the rights under national and employment law, and that they are free to join a union. Collective agreements are available from union representatives.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>any negative consequences or retaliation from the operating company;</p> <p>c. If relevant, inform workers of their rights under any applicable collective agreement; and</p> <p>d. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative.</p>		<p>However, interviews with workers employed by Business Partners indicate that unionization is discouraged.</p>
3.1.2.7.	<p>The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike.</p>		<p>Documents demonstrate respect for legal strikes by site management, including non-interference with a picket and non-intimidation / retaliation provisions. While issues persist between management and unions, on-site interviews with workers and union representatives do not suggest discrimination or retaliation against workers who participate in worker organizations or a legal strike.</p>
3.1.2.8.	<p>Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements.</p>		<p>Collective bargaining agreements and other supporting evidence were provided. On-site interviews with workers and union representatives indicate that the terms of the agreements have been respected.</p> <p>On-site interviews suggest that in the handover from the previous operating company, re-alignment of collective agreements served to change or reduce more favorable terms of previous collective agreements .</p>
3.1.2.9.	<p>The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations.</p>	<p>L</p>	<p>Evidence provided and interviews with managers indicate that short-term contracts have not been used to undermine collective bargaining. While short-term contracts are used, on-site interviews with workers and union representatives do not suggest the operating company uses short-term contracts to undermine collective agreements.</p>
3.1.2.10.	<p>The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in</p>	<p>L</p>	<p>Evidence provided and interviews with managers indicate that replacement workers have not been used to undermine a legal strike. While workers may have been used to maintain essential services, on-site interviews with workers</p>

Requirement #	Requirement Text	Rating	Basis for rating
	good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike.		and union representatives do not suggest the operating company has used replacement workers to undermine a legal strike.
3.1.3.1.	The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements.	●	Policies and procedures provided as evidence emphasize hiring and recruitment, but do not speak to equal opportunity or equality in working conditions. On-site interviews with salaried employees, contracted employees and union representatives indicate potential differences in opportunity and working conditions, but do not suggest discrimination in employment decisions. The shared Task Team Salaries Disparities memo demonstrates management efforts to address salary differences with union representatives.
3.1.3.2	<p>Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:</p> <ul style="list-style-type: none"> <li>a. Targets or quotas mandated by law;</li> <li>b. Targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; or</li> <li>c. Operating company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets.</li> </ul>	L	Evidence provided outlines exceptions based on local recruitment and affirmative action agreements with local communities. On-site interviews with union representatives indicate on-going meetings with management to address employment equity.
3.1.3.3.	<b>Critical</b> The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	●	<p>Clear evidence provided of policy and training to prevent or address discrimination, bullying and harassment, and gender-based violence has been developed and implemented.</p> <p>Harassment focused on female workers or sexual in nature was not suggested in the conducted interviews.</p>

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3.1.4.1.	Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination and be implemented to reduce the adverse impacts of retrenchment on workers.	—	On-site interviews, confirmed by management, cite no examples of retrenchment in the 4 years preceding the audit. No previous historic examples of retrenchment were referenced.
3.1.4.2.	The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments.	—	On-site interviews, confirmed by management, cite no examples of retrenchment in the 4 years preceding the audit. No previous historic examples of retrenchment were referenced.
3.1.5.1.	<p><b>Critical</b> 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> <ul style="list-style-type: none"> <li>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;</li> <li>b. Shall allow for anonymous complaints to be raised and addressed;</li> </ul>	●	<p>The operating company has a grievance procedure for workers in place, accessible on numerous platforms, including anonymously. On-site interviews confirm that grievances made by employees to the operating company are addressed at an appropriate level of management and in a timely manner. Workers and union representatives confirm that the grievance procedure allows workers to be represented. During interviews with workers and union representatives, there was no indication that the operating company had impeded other judicial or administrative authority.</p> <p>The Contractor Management Procedure is intended to place employees and contractors on a level playing field with respect to grievances related to environmental, health and safety issues. On-site interviews, however, indicates</p>

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	<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>		contracted workers are reluctant to lodge grievances with their business partner employers or the operating company.
3.1.5.2.	The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.		Induction materials provided and interviews with managers, workers and union representatives confirm that workers are informed regarding a multi-platform grievance mechanism at the time of recruitment and subsequently in discussions with union representatives.
3.1.5.3.	The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues.	L	Evidence provided indicates the operating company maintains a detailed record of grievances. Additional evidence cited examples of how grievances had been resolved.
3.1.6.1.	The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers.	L	Evidence provided indicates documented disciplinary procedures that are accessible to workers. On-site interviews with workers and union representatives confirm this finding.
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.	L	The evidence provided indicates full respect for anti-harassment laws and regulations. On-site interviews with workers and union representatives do not suggest that corporal punishment or any form of degrading treatment is present or acceptable in disciplinary actions.
3.1.6.3.	The operating company shall keep records of all disciplinary actions taken.	L	The evidence provided indicates detailed records of disciplinary actions taken. On-site interviews with managers confirm this finding.



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3.1.7.1.	The operating company shall document the ages of all workers.	L	The evidence provided indicates that date of birth is a mandatory field in the employee relations management system recruitment / employee system. Security clearance requires government issued documents. A worker list with ages was provided. On-site interviews with workers and union representatives do not suggest that child labor is employed at the mine.
3.1.7.2.	<b>Critical</b> 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).	L	The Recruitment Policy explicitly states no person will be hired under the minimum school leaving age, if this is 15 or older. The policy further states that no person may employ a child for work that is inappropriate of that age or places the child's well-being at risk. The site worker list provided does not include any person under the age of 18. Birth date capture is mandatory in the employment management system. On-site interviews with managers, workers and union representatives do not indicate the recruitment or hiring of anyone under the age of 18 by the operating company.
3.1.7.3.	<b>Critical</b> The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher.	L	The Recruitment Policy explicitly states no person will be hired under the minimum school leaving age, if this is 15 or older. The policy further states that no person may employ a child for work that is inappropriate of that age or places the child's well-being at risk. The site worker list provided does not include any person under the age of 18. Birth date capture is mandatory in the employment management system. On-site interviews with managers, workers and union representatives do not indicate the recruitment or hiring of anyone under the age of 18 by operating company.
3.1.7.4.	When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself.	—	From evidence provided and on-site interviews with managers, workers and union representatives, there is no indication that the operating company is employing child labor.

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3.1.7.5.	<p>If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:</p> <ul style="list-style-type: none"> <li>a. The child shall be removed immediately from his or her job; and</li> <li>b. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family.</li> </ul>	—	From evidence provided and on-site interviews with managers, workers and union representatives, there is no indication that the operating company is employing child labor. This criterion is therefore Not Relevant.
3.1.7.6.	<p>Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.</p>	—	Evidence provided and on-site interviews do not indicate that there is a high risk of child labor being utilized in the mine's supply chain. This criterion is therefore Not Relevant.
3.1.8.1.	<p><b>Critical</b> The operating company shall not employ forced labor or participate in the trafficking of persons.</p>	L	South Africa's constitution forbids the use of forced labor. The group policy statement provided indicates that the operating company explicitly prohibits the use of forced labor. On-site interviews with managers, community groups, workers, and union representatives did not indicate the use of forced labor.
3.1.8.2.	<p>Where there is a high risk of forced or trafficked labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that</p>	—	From evidence provided and on-site interviews with community groups, union representatives and workers, there is no indication that there is a high risk of forced or trafficked labor in the mine's supply chain. This criterion is therefore Not Relevant.


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	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.		
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.	L	Evidence provided demonstrates wages for full-time permanent employees of the mine are above minimum wage. Limited information was provided for wages paid to contracted workers employed by business partners at the mine.
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.		Collective and wage agreements indicate overtime is paid at a rate above regular hourly wages. Operating company employment contracts examples state adherence to relevant legislation. The progressive overtime report indicates a difference between overtime worked and overtime paid. On-site interviews suggested a level of uncertainty as to what overtime was paid and when.
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.		Pay slips and contract examples were provided. On-site interviews with employees of the operating company indicate a reasonable understanding of pay benefits and deductions. Limited payment information was available to auditors for contracted workers at the mine.
3.1.9.4.	The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check).	L	Evidence provided, confirmed by interviews with managers and workers, indicates that all workers are paid by electronic bank transfer. Interviews suggested this was a reasonable payment method.
3.1.9.5.	The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist: <ul style="list-style-type: none"> <li>a. Deductions from wages for disciplinary purposes are permitted by national law, and the law</li> </ul>	L	Evidence was provided (Conditions of Employment Manual; recovery of overpayment example; pay slip example; union stop order deduction; tax anomaly example). On-site interviews with managers and workers do not indicate wages have been withheld for disciplinary purposes.

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	<p>guarantees the procedural fairness of the disciplinary action; or</p> <p>b. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award.</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 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>	L	<p>The evidence provided indicates that most of the requirements' sub-criteria are met. On-site interviews with workers indicate that typically overtime requests are consensual, except during emergencies. Limited information was available to compare overtime rates of operating company employees and contracted workers.</p>
3.1.10.2.	<p>Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:</p>	L	<p>The evidence provided suggests that leave for employees of the operating company exceeds national minimum requirements. On-site interviews with contracted workers do not confirm that national leave requirements are met by business partners. Interviews also indicate that the operating company has</p>

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	<ul style="list-style-type: none"> <li>a. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and</li> <li>b. A maternity leave period of no less than 14 weeks.</li> </ul>		required employees to take annual leave when road blockades (protests) prevent employees from accessing the mine site.
<b>Chapter 3.2—Occupational Health and Safety</b>			
3.2.1.1.	The operating company shall implement a health and safety management system for measuring and improving the mining project's health and safety performance.	L	<p>Anglo American has developed the global health and safety management system to the mine where the controls and operations are delivered by the onsite team with specific support from global functions as required.</p> <p>At the time of the audit the management system had determined a compliance score of 95%.</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>The supplied evidence confirms Mototolo Complex and Concentrator have conducted a baseline risk assessment individually. A complex and comprehensive risk assessment methodology has been deployed following a recognized risk assessment methodology for industrial operations.</p> <p>According to the mine, Mototolo Complex is in the process to develop a Mototolo Complex baseline risk assessment based on the life cycle approach (from initiation of operations to closure).</p> <p>Bowtie analysis is completed to identify high risks or high uncertainty risks.</p>
3.2.2.2.	<p>The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:</p> <ul style="list-style-type: none"> <li>a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and</li> </ul>	●	Evidence provided indicates that the mine has systems in place for the ongoing and systematic assessment of health and safety risks. Some of those systems or the risk assessments they produce are incomplete, although mine is mostly aware of the gaps and is pursuing actions to close them. There is process mapping ongoing to begin evaluating life-cycle related risks, and the operation is in the process of developing high risk task job risk assessments.

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	<p>machinery, and waste and chemical management;</p> <p>b. All personnel, contractors, business partners, suppliers and visitors;</p> <p>c. Unwanted events;</p> <p>d. Routine and non-routine activities, products, procedures, and services; and</p> <p>e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services.</p>		<p>At a follow-up assessment, it was determined that the process of developing high risk task job risk assessments had been implemented. Not all relevant risk assessments had been updated at that time, however.</p>
3.2.2.3.	<p>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>	L	<p>The evidence provided shows that the mine has performed comprehensive risk evaluations for employees based upon their work function/role and has identified hazards to which these broad groups of employees may be vulnerable.</p> <p>There is an evaluation of issues related to fitness for work underground that addresses pregnant women and personnel requiring vision correcting glasses.</p> <p>Evaluation for restrictions takes place on a case-by-case basis and from discussion it would appear to cover many of the susceptible workers.</p>
3.2.2.4.	<p>The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards.</p>		<p>The mine has identified necessary risk management plans for identified major hazards. Some have been developed, but not all. The operation is still in the process of developing some high-risk task job risk assessments.</p> <p>Plans for control of certain aboveground fire and explosion hazards were noted to be inadequate. Most notably, task-based risk assessment and controls for aboveground hot work was lacking.</p> <p>Following the site assessment, the hot work procedures were revised to include above-groundwork and address the noted shortcomings.</p>
3.2.2.5.	<p>In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:</p>		<p>Provided evidence shows that the mine has regularly updated plans, which were developed with the participation of relevant experts, covering the required elements. Evidence also included some testing and inspection to confirm conformance to procedures.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>c. Maintain the stability of the ground in areas to which persons have access in the context of their work;</li> <li>d. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface;</li> <li>e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted;</li> <li>f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards;</li> <li>g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and</li> <li>h. Ensure that when there is potential high risk of harm to workers, operations are stopped, and workers are evacuated to a safe location.</li> </ul>		<p>Observations during the Stage 2 site inspection confirmed that there are procedural controls related to all major risks and that most of these appear to be effectively implemented. The most notable exception was high level risk assessment documents that included some hot work risks, but the identified task/steps/exposures did not cover the situations observed. Secondly, there was no mention of cutting/grinding or welding near flammable or combustible materials (other than rubber lined pipes, conveyors, or empty tanks), no mention of arc hazard for the worker or other people nearby, no mention of using a fire watch, no mention of cutting/grinding or welding on or near mobile equipment, and no mention of expectations for cylinder valve management, pressure limitations, and oxygen cleanliness. Furthermore, there was no evidence that these risk assessments were in use.</p> <p>Following the site assessment, the hot work procedures were revised to include above-ground work and address the noted shortcomings.</p>
3.2.3.1.	<p>Workers shall be informed of their rights to:</p> <ul style="list-style-type: none"> <li>a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority;</li> <li>b. Request and obtain, where there is cause for concern on safety and health grounds,</li> </ul>	L	<p>Interviews and site observations confirmed that there were numerous means of communicating legal rights and obligations to workers.</p> <p>The Mine Health &amp; Safety Act requires workers to be informed of their rights. There are posters on-site informing them. These are codified in South African mining legislation and the specific requirements are communicated via training and signs/posters throughout the main working areas of the mine.</p>

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	<p>inspections and investigations to be conducted by the employer and the competent authority;</p> <p>c. Know and be informed of workplace hazards that may affect their safety or health;</p> <p>d. Obtain information relevant to their safety or health, held by the employer or the competent authority;</p> <p>e. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and</p> <p>f. Collectively select safety and health representatives.</p>		<p>Employees appeared to be well informed and aware of these rights and the means to exercise them.</p>
3.2.3.2.	<p>In all cases a worker attempting to exercise any of the rights referred to in 3.2.3.1 in good faith shall be protected from reprisals of any sort.</p>		<p>Evidence provided confirms that the mine has procedures and policies in place to protect workers from reprisals for attempting to exercise their rights.</p> <p>Evidence did not include whether any employees had attempted to exercise their rights and, if so, evidence to verify whether reprisals have occurred and how they were managed to prevent recurrence.</p> <p>There are many examples of workers calling "Player 23," which has to do with Section 23 of the Mine Health and Safety Act describing these rights. There is a log maintained of workers applying this right.</p> <p>Additionally, there is a grievance hotline administered externally where anonymous complaints can be made. These are directed to Anglo American corporate.</p> <p>During discussions, some employees didn't entirely trust that complaints would be addressed or that there would be full protection from reprisal. In general, however, the relevant processes appeared to be in place and effective for the mine employees.</p> <p>For contractor employees, there was less confidence in the effectiveness of addressing reported issues or safeguards against reprisal. However, no specific instances of failures in this regard were reported.</p>

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3.2.3.3.	The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety.	●	Evidence provided, along with evidence from the site visit, confirm that the mine has various procedures and policies in place to communicate with and enable input from the workforce.  A health and safety agreement that forms part of this process is still under review, so this element of the process is not fully implemented.
3.2.3.4.	The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including: <ul style="list-style-type: none"> <li>a. Health and safety hazard identification and assessment;</li> <li>b. Design and implementation of workplace monitoring and worker health surveillance programs;</li> <li>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</li> <li>d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health.</li> </ul>	●	Evidence provided confirms that the mine has various procedures and policies in place to involve workers' representatives (typically through health and safety committees) and management to ensure worker consultation and participation in operational health and safety matters.  The evidence provided showed that worker representatives were invited to attend a review related to a fitness and occupational wellness center but did not specifically confirm worker consultation and participation in the design and implementation of workplace monitoring and worker health surveillance programs, or the development of appropriate assistance and programs to support worker health and safety, including worker mental health.  During the assessment, it was confirmed that processes for worker participation in matters related to occupational health and safety exist and some workers are involved. Interviewed workers, however, reported not receiving feedback to determine how the results of their engagement were used.  Additionally, as some programs were not fully developed or implemented, worker participation could not be confirmed in all health and safety programs.
3.2.3.5.	The operating company shall provide workers' health and safety representatives with the opportunity to: <ul style="list-style-type: none"> <li>a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace;</li> <li>b. Monitor and investigate safety and health matters;</li> <li>c. Have recourse to advisers and independent experts; and</li> </ul>	L	The evidence provided confirms that health and safety representatives are included when Visible Felt Leadership Inspections are conducted by management. Health and safety representatives or union representatives form part of the incident investigation team. A daily safety, health and environment report is sent out to the complex indicating the injury stats. The Right to Refuse Dangerous Work document describes how workers' representatives can access independent experts. These can also be requested during Tripartite Forum meetings. Based on discussions, it did not appear as if this ability had ever been tested.

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	d. Receive timely notice of accidents and dangerous occurrences.		
3.2.3.6.	Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering.	L	<p>The evidence provided confirms that visitors and other third parties are provided with induction training containing basic operational health and safety information.</p> <p>Other evidence provided confirms that visitors are provided with suitable personal protective equipment (PPE), as required.</p> <p>Site observations further reinforced that these requirements were being met. The assessment team was given an induction and provided with PPE. Discussions showed this is standard practice.</p>
3.2.4.1.	<p><b>Critical (a and b)</b> The operating company shall implement measures to protect the safety and health of workers including:</p> <ul style="list-style-type: none"> <li>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;</li> <li>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;</li> <li>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;</li> <li>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;</li> </ul>	●	<p>Evidence provided, and site visits confirmed that the mine has implemented numerous measures to protect the safety and health of workers, including the individual requirements of this criteria. However, during the assessment some poor/unsafe conditions and execution of work tasks related to hot work were not properly controlled. This appeared to be due to lack of risk awareness. Incomplete or missing task-based risk assessments were contributing to this.</p> <p>The site provided several high-level risk assessment documents that included some hot work risks, but the identified task/steps/exposures did not cover the situations observed. Secondly, there was no mention of cutting/grinding or welding near flammable or combustible materials (other than rubber-lined pipes, conveyors, or empty tanks). There was no mention of using a fire watch, no mention of cutting/grinding or welding on or near mobile equipment, and no mention of expectations for cylinder valve management, pressure limitations, oxygen cleanliness, etc.</p> <p>In general, 'Stop, Look, Assess, and Manage' reports were being completed but not used as intended - repeating existing or common/normal controls rather than focusing on unusual hazards or changes. (Note that the 'Stop, Look, Assess, and Manage' is the only task-based risk management tool available for tasks that do not have job risk assessments.)</p> <p>May 2023: In the site's Corrective Action Plan, they stated that job risk assessments are being developed for high-risk work. Fire and hot work are related to several high-risk jobs. A consultant is appointed to update job risk assessments. Also, communication and awareness related to the use of 'Stop,</p>

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	<p>e. Providing adequate supervision and control on each shift; and</p> <p>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</p>	L	<p>Look, Assess, and Manage' and the mind jogger completion would be rolled out at operational safety, health &amp; environment meetings with supervisors.</p> <p>On-site: The site had developed and provided evidence of updated risk assessments and job risk assessments being in place, but observations and interviews showed that the revised templates were not rolled out across the entire mining complex.</p> <p>At the time of the audit, individuals that were tasked with completing risk assessments had not yet undergone the required training. The assessor was unable to visit other areas where similar activities or risks were present and could not therefore confirm that corrective actions had been broadly applied.</p> <p>Feedback provided post-audit – 3 July 2023, indicated that 34 out of 35 employees have completed the hot work training. The 35<sup>th</sup> employee had left the mine and was not required to complete the training.</p> <p>Nov 2023 – Corrective action plan review. The site has provided evidence to demonstrate the progress of the initial corrective actions to isolate and progress corrective actions following site investigations. Further independent verification of the implemented measures of the corrective action plan will be included in the first surveillance audit.</p>
3.2.4.2.	<p>If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers.</p>	L	<p>The evidence provided confirms that the mine has identified occupational health and safety risks for certain groups of workers and determined some controls that should be executed.</p> <p>It is not clear from the evidence provided that workers that face unique health and safety risks are provided with training and informational materials to understand the risks and proposed controls. However, there were no observed examples in which a worker appeared to be in a role that was unsuitable based upon unique health and safety risks.</p> <p>There is an evaluation of issues related to fitness for work underground that addresses pregnant women and personnel requiring vision correcting glasses.</p> <p>Evaluation of restrictions takes place on a case-by-case basis.</p>
3.2.4.3.	<p>The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff</p>	●	<p>The evidence provided confirms that the Mototolo Complex provides employees with clean toilets, washing and locker facilities, and drinking water, and has processes to ensure the facilities remain in clean, safe, usable condition.</p>

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	employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers.		Site observations confirmed this. One issue of concern was an underground female toilet that was noted to have a gap all around the door. Several females reported they were uncomfortable with this.
3.2.4.4.	<p>The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows:</p> <ul style="list-style-type: none"> <li>a. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement: <ul style="list-style-type: none"> <li>i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period;</li> <li>ii. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary they would otherwise normally receive if healthy and working); or</li> <li>iii. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker's employment at the mining project.</li> </ul> </li> <li>b. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable</li> </ul>	L	<p>The evidence provided confirms that there is a process for compensation for work-related injuries and illnesses (reportedly in accordance with the Compensation for Occupational Injuries and Diseases Act 130 of 1993).</p> <p>The evidence provided addressed injuries and many chronic illnesses or conditions such as hearing loss.</p> <p>Lung diseases showing up after a worker has retired will be reported to the Mine Medical Bureau for Occupational Diseases – Anglo American would then be responsible for aiding.</p> <p>Anglo American has an occupational disease specialist who tracks down and assists workers, even in other countries such as Mozambique.</p>

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	<p>access to rehabilitation programs to facilitate an expeditious return to work; and</p> <p>c. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation that is equal to or greater than three months' salary of the deceased worker.</p>		
3.2.5.1.	<p>The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures.</p>	L	<p>The evidence provided confirms that Mototolo Complex and workers' representatives on a joint health and safety committee perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures as per safety, health and environment monitoring plans and as per requirements of the Mine Health and Safety Act - 29 of 1996.</p>
3.2.5.2.	<p>The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:</p> <p>a. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals;</p> <p>b. Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests;</p> <p>c. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory;</p>	L	<p>Workplace monitoring and worker health surveillance are conducted by industrial hygienists who are also responsible for the mine ventilation. There is a well-equipped clinic that undertakes comprehensive worker health monitoring. Worker medical data is managed confidentially.</p> <p>Portable monitoring devices were calibrated and in good condition.</p> <p>Reportedly, all lab analysis for workplace monitoring takes place through a certified lab. Evidence of certification was provided.</p>

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	<p>d. Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and</p> <p>e. If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits.</p>		
3.2.5.3.	Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results.	L	<p>The evidence provided confirms that operational risk management training is required for all employees, standards and other risk management tools are updated on a regular basis ("regular" is not always defined) or as needed based upon certain changes, issues are identified through incident investigation, and there were changes in the use of contractors or modifications to the Operational Maintenance and Surveillance Report.</p> <p>Procedure/document/control updates can be triggered because of incident investigations. An ISO 9001 document control system includes a review process. Training materials are revised because of inspections or investigations.</p> <p>Work execution documents can trigger a job risk assessment update recommendation.</p>
3.2.5.4.	The operating company shall ensure that all workplace injuries, fatalities, accidents and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, investigated and that appropriate remedial action is taken.	L	<p>Evidence provided confirms that Mototolo Complex has processes in place to ensure that all workplace injuries, fatalities, accidents, and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, and investigated, and that appropriate remedial action is taken following a formal change management review.</p> <p>Evidence provided included confirmation examples that required reporting takes place, investigation for root cause occurs and actions are developed and tracked to closure.</p>
3.2.6.1.	The operating company shall maintain accurate records of health and safety risk assessments;	L	Evidence provided confirms that Mototolo Complex maintains accurate records of health and safety risk assessments in the form of a register, except for the

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	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.		baseline risk assessments that are uploaded on the online database Enablon; of workplace monitoring and workers' health surveillance results; and of data related to occupational injuries, diseases, accidents, fatalities, and dangerous occurrences collected by the company and submitted to competent authorities.  The evidence provided confirms that access to employee human resources information is available upon request but does not specify to whom or state that confidential medical records are excluded.
3.2.6.2.	The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the health data management system.	L	Evidence provided confirms that the mine has a data management system for storing worker health data and that the system enables the secure storage of worker health data protected by medical confidentiality, and that applicable records will be retained for a minimum of 40 years.  The Mine Safety & Health Act requires that worker health data be retained for 40 years past life of mine. Currently getting existing records that were managed by a third party scanned and imported into a database - specifically to manage privacy and confidentiality issues.  The Protection of Personal Information Act introduced in 2021 governs personal information. All staff in medical facilities are subject to privacy and confidentiality agreements. On-site discussion of personal health data indicates it is managed confidentially and maintained securely.
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.	●	Evidence provided for other criteria indicates that workers may access medical information upon request but does not confirm that this right includes all the specified personal information.  Incident investigation information is shared upon conclusion of an investigation. Investigation data is loaded into the "Isometrix" system and is available from that platform. It is not available direct to all employees, however. Many do not have direct access to the system and would need to rely upon human resources or other management personnel to review their personal data.  Several employees indicated they would not know how to access their data, and in the case of environmental, health and safety monitoring data, they did not know what sort of information might be available.

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			<p>The system allows workers to request the release of medical documents to legal or mine safety personnel.</p> <p>The Safety, Health, and Environment Policy includes a right to access information unless deemed to be business sensitive.</p>
<b>Chapter 3.3—Community Health and Safety</b>			
3.3.1.1.	<p><b>Critical</b> 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"> <li>a. General mining operations;</li> <li>b. Operation of mine-related equipment or vehicles on public roads;</li> <li>c. Operational accidents;</li> <li>d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);</li> <li>e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);</li> <li>f. Mining-related effects on community demographics, including in-migration of mine workers and others;</li> <li>g. Mining-related impacts on availability of services;</li> <li>h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and</li> <li>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,</li> </ol>		<p>The scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities did not include all the requirements; however, elements are included in other supporting documents.</p> <p>The provided Investment Development Model (IDM) and Social Way Assurance Framework, confirmed that community and sensitive receptors were identified as part of stakeholder impact management plans.</p> <p>Risks relating to sub-requirements a, b, c, f, g, and h have been scoped. Risks and impacts to community relating to d, e, and i are identified and scoped in separate programs.</p> <p>Failure of structural elements such as tailings dams, is scoped through Anglo's technical programs addressing dam safety.</p> <p>Sub-requirement e is addressed, as Priority Ecosystems Baseline surveys were undertaken by an external specialist in 2021. Following on from this, community engagement sessions were held with the specialists from Scientific Aquatic Services. Sub-requirements d and e are included in emergency planning and biodiversity assessments.</p> <p>For sub-requirement i, the Social Way Toolkit explains how the mine engages with local health authorities on public health programs that include the risks associated with communicable diseases, so there is clearly an understanding of their intent and extent.</p>

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	Ebola virus disease) that could occur as a result of the mining project.		The communication of these risks to the respective communities have not been fully completed and further reviews will be undertaken during surveillance to assess where gaps may exist in the awareness and training programmes.
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).	L	Corporate level evidence demonstrates internal requirements to examine risks and impacts throughout the lifecycle, from preconstruction through to post-closure (Investment Development Model, Social Way 3.0, Social Way toolkit 4C). The risk register only identifies risks and impacts during the operations phase (Der Brochen Risk Register - 2021). The Environmental Impact Assessment identifies risks and impacts for pre-construction, construction, operation, closure, and post-closure.
3.3.1.3.	Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities.		Corporate level evidence demonstrates internal requirements to consider vulnerable groups. The Stakeholder Impact Assessment includes a section that broadly defines vulnerable groups identified in the project area. This impact assessment does not include differential impacts to vulnerable groups or impacts on them specific to community health and safety. However, it does mention that vulnerable groups may be disproportionately affected due to their limited access to information and political power. The Community Health and Safety Plan, which was still under development at the time of this assessment, will reportedly address this gap.
3.3.2.1.	The operating company shall carry out an assessment of risks and impacts to: <ul style="list-style-type: none"> <li>a. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping;</li> <li>b. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable.</li> </ul>	L	Corporate level evidence demonstrates internal requirements to predict the nature, magnitude, extent, and duration of impacts and to evaluate the significance of each. The Environmental Impact Assessment demonstrates full impact assessment for the operation that includes appropriate impact assessment methodologies described in sub-requirements a and b.
3.3.3.1.	The operating company shall document and implement a community health and safety risk management plan that includes:	⊗	Evidence demonstrates corporate level intention for community health and safety risk management planning. The site acknowledges in evidence that no site level community health and safety plan is in place but is in development.

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	<ul style="list-style-type: none"> <li>a. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and</li> <li>b. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective.</li> </ul>		
3.3.3.2.	Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation.	⊗	Evidence demonstrates corporate level intention for community health and safety mitigation measures that prioritize avoidance over minimization. Site acknowledges in evidence that no site level community health and safety plan is in place but is in development
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.	⊗	Evidence demonstrates corporate level intention for community health and safety planning and updates. The site acknowledges in evidence that no site level community health and safety plan is in place but is in development.
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"> <li>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;</li> <li>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</li> </ul>	⊕	<p>Extensive efforts have been made in managing tuberculosis and COVID-19, including awareness campaigns and a community response plan. However, COVID-19 is not necessarily mine-related, and other risks, including HIV/AIDs, are not demonstrated to be managed through evidence.</p> <p>Sub-requirement c is met through community engagements and awareness campaigns.</p> <p>More evidence is required to demonstrate adherence to sub requirements a and b (with a focus on HIV/AIDS). An HIV/AIDS policy, testing and awareness programs are needed.</p>

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	<p>companies, civil society organizations and policymakers; and</p> <p>c. Make information publicly available on its infectious disease mitigation program.</p>		
3.3.4.2.	<p>If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:</p> <p>a. In relation to HIV/AIDS, the operating company shall, at minimum:</p> <ul style="list-style-type: none"> <li>i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;</li> <li>ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate;</li> <li>iii. Provide access for contractors to education and other preventative programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and</li> <li>iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members.</li> </ul> <p>b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by</p>	⊗	<p>Corporate evidence suggests how the Risk and Impact Assessment for Community, Health and Safety is to be undertaken (specifically Toolkit 4C). There is no evidence and acknowledgement by the site that the sub-requirements A and B in relation to community health and safety risks are not known actions with respect to HIV/AIDS and tuberculosis awareness are currently being undertaken by the mine. The mine is not located in a malaria-prone area, so requirement C is not relevant.</p>

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	<p>public or private health programs at an affordable rate.</p> <p>c. In relation to malaria, the operating company shall, at minimum:</p> <ul style="list-style-type: none"> <li>i. Develop a vector control plan;</li> <li>ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and</li> <li>iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing.</li> </ul>		
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"> <li>a. Scoping of community health and safety risks and impacts related to mining;</li> <li>b. Assessment of significant community health and safety risks and impacts related to mining;</li> <li>c. Development of prevention or mitigation strategies;</li> <li>d. Collection of any data needed to inform the health risk and impact assessment process; and</li> <li>e. Design and implementation of community health and safety monitoring programs.</li> </ul>	⊗	Evidence does not demonstrate community engagement input on A - E.
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>Evidence does not demonstrate information relating to safety risks and impacts and monitoring results being disclosed. However, there is evidence of disclosure of risks to community health including COVID-19, hypertension, and diabetes in the Platinum Times newspaper.</p> <p>Evidence was not available to demonstrate that community health and safety risks / impacts and monitoring and evaluation results are shared with the</p>

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			broader community (meeting minutes, attendance register, advertisement of meetings to disclose).
Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas			
	Chapter not assessed	—	IRMA provided guidance for participating sites and auditors that during the launch phase of the IRMA standard this chapter should be assessed with information provided to IRMA to inform the next revision; however, the chapter did not have to be scored by auditors
Chapter 3.5—Security Arrangements			
3.5.1.1.	The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force.	L	The Human Rights Policy and Voluntary Principles on Security and Human Rights Policy are in place. The Human Rights Policy has been made public. Page 3 of the Human Rights Policy outlines a commitment to respect human rights, and page 4 confirms a position as a signatory to the Voluntary Principles on Security and Human Rights Policy and respect for human rights via any necessary interactions with both public and private security providers.
3.5.1.2.	<b>Critical</b> 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: <ul style="list-style-type: none"> <li>a. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;</li> </ul>	L	A procedure relating to use of force is included in Section 9 of Use of Force Group Policy, pages 5-12. <ul style="list-style-type: none"> <li>a. Use of force applies only if an attack against a person is about to start/has started.</li> <li>b. Use of force must be reasonable, proportional, and necessary.</li> <li>c. Where any weapon or firearm is used by the suspect, the response team is authorized to use their firearms in self-defense.</li> </ul>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul>		
3.5.1.3.	<p>If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:</p> <ul style="list-style-type: none"> <li>a. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms;</li> <li>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</li> <li>c. Outlines required training for security personnel.</li> </ul>	●	<p>Operation uses a private security company, Phoenix K9 and Tubatse Security Services, with whom they have a contract.</p> <ul style="list-style-type: none"> <li>a. Specification 2.2 requires the security supplier to ensure all personnel comply with the Voluntary Principles on Security and Human Rights Policy and Anglo American policy on adherence to the Voluntary Principles on Security and Human Rights Policy. The contract requires that all members have reviewed the Voluntary Principles on Security and Human Rights Policy, completed a safety induction for protection services, and registered with Private Security Industry Regulatory Authority (PSIRA) with zero deviations.</li> <li>b. Duties and obligations are outlined in the contract with the security contractor in contract in sections 2, 3 and 4 (b)</li> <li>c. Required training is mentioned in the contract; however, reference is to the Training Matrix, which was not provided in evidence.</li> </ul>
3.5.1.4.	<p>If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or similar agreement with public security providers that includes similar provisions to those in 3.5.1.3.</p>	⊕	<p>There is a documented memorandum of understanding (MoU) with local public security stakeholders. The MoU does not refer to provisions specific to human rights / use of force / firearms.</p>
3.5.2.1.	<p>The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities,</p>	L	<p>A risk assessment was undertaken in July 2019 by an operation that assesses security risks and potential human rights impacts. The Workplace Risk Assessment and Control Assessment describes unwanted event/current controls/likelihood/additional controls relating to security provisioning in section 2, page 10.</p>

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	security arrangements, or in the operating environment.		A risk assessment on Security Management and the Voluntary Principles on Security and Human Rights was undertaken by the social performance team with security team to assess the potential risks to human rights - October 2021.
3.5.2.2.	<p>Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall:</p> <ul style="list-style-type: none"> <li>a. Follow a credible process/methodology;</li> <li>b. Be carried out and documented by competent professionals; and</li> <li>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.</li> </ul>	⊕	<ul style="list-style-type: none"> <li>a. Operating company (Anglo) Workplace Risk Assessment and Control (Social and Human Rights Impact and Risk Analysis) assessment methodology was applied.</li> <li>b. The Social and Human Rights Impact and Risk Analysis was carried out by the social performance team, together with the Protection Services senior superintendent and was approved by the Protection Services manager for the operation.</li> <li>c. No evidence indicated that information was obtained from diverse groups or sources or if the perspectives of women, children (or their representatives) and other vulnerable groups have been included. However, the Community Engagement Forum and Social and Labor Plan process will encompass security issues moving forward, which was to be (and assumed to have been) implemented in 2022.</li> </ul>
3.5.2.3.	<p>The scope of the security risk assessment shall include, but need not be limited to:</p> <ul style="list-style-type: none"> <li>a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups;</li> <li>b. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption);</li> <li>c. Analysis of current and potential conflicts or violence in the host country and affected communities; and</li> <li>d. Risks associated with equipment transfers.</li> </ul>	⊕	<ul style="list-style-type: none"> <li>a. The Workplace Risk Assessment and Control identifies security risks to Der Brochen Mototolo, its workers, and communities. It also includes a high-level assessment of vulnerable groups.</li> <li>b. Human rights impacts are company-specific and do not include a broader account of security context of government and public/private security forces.</li> <li>c. There is no assessment of current or potential conflicts in affected communities.</li> <li>d. There is no identification of risks associated with equipment transfers.</li> </ul>

Requirement #	Requirement Text	Rating	Basis for rating
3.5.2.4.	The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective.	⊕	The Workplace Risk Assessment and Control report includes actions to prevent and mitigate security risks. There was no available evidence of a standalone risk management plan with monitoring and evaluation.
3.5.2.5.	If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform with requirements in IRMA Chapter 1.3.	⊕	Potential risk for conflict between communities has been identified. Collaboration with communities and workers to identify mitigation strategies regarding security risks is included in the social and human rights impact and risk analysis process but has not been carried out as establishing the Community Engagement Forum is still in progress.
3.5.3.1.	The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.	L	A criminal background screening on suitable security officers was conducted by the operation and provided in evidence. Private Security Industry Regulatory Authority certificates were provided for security personnel and required for employment / deployment (including renewal). Screening procedure: "Criminal / security risk screening will be done prior to employment, thereafter once every two years, or as and when required." All protection service employees are subjected to mandatory screening. Specific screening measures are clearly outlined in 9.2 of the procedure.
3.5.3.2.	The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.	—	The site makes use of public security personnel (the South African Police Services) for public disturbances and conflict, and high risk situations, which are not directly related to the site, but indirectly resulting from the operations. This is therefore not considered applicable, as the site does not make consistent and direct use of public protection services. This requirement will be further reviewed at the surveillance audit.

Requirement #	Requirement Text	Rating	Basis for rating
3.5.4.1.	Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with particular reference to vulnerable groups, and the company's policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers.	L	Evidence demonstrates comprehensive training on the Voluntary Principles on Security and Human Rights Policy (training material), which is attended by security personnel regularly (attendance register, training record provided).
3.5.4.2.	If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security.	—	The site makes use of public security personnel (the South African Police Services) for public disturbances and conflict, and high risk situations, which are not directly related to the site, but indirectly resulting from the operations. This is therefore not considered applicable, as the site does not make consistent and direct use of private protection services.  This requirement will be further reviewed at the surveillance audit.
3.5.5.1.	The operating company shall: 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;	⊕	Mototolo uses the overarching Voluntary Principles on Security and Human Rights Policy to guide how security incidents relating to human rights are managed.  a. No incidents have been recorded that have resulted in injuries, fatalities or alleged human rights impacts on community members or workers. Security incidents are documented and investigated through the incident reporting procedure and incident management procedure, which are currently under review.  b. & c. The incident procedure requires that appropriate actions be taken where there are unlawful acts and human rights infringements.  d. The procedure also outlines the procedure for reporting security incidents.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>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;</p> <p>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;</p> <p>e. Provide medical assistance to all injured persons, including offenders; and</p> <p>f. Ensure the safety of victims and those filing security-related allegations.</p>		<p>e. No incidents have been recorded that have resulted in injuries or fatalities. There is no clear evidence in policies and procedures for the provision of medical assistance and safety of victims.</p> <p>f. No incidents have been recorded that have resulted in injuries or fatalities. There is no clear evidence in policies and procedures to ensure the safety of victims and those filing security-related allegations.</p>
3.5.5.2.	<p>In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents.</p>	—	<p>No incidents have been recorded that have resulted in injuries, fatalities or alleged human rights impacts on community members or workers.</p>
3.5.6.1.	<p>If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms.</p>	L	<p>Procedures are available on request, however no evidence that procedures have been requested in the past. Request any evidence including meeting minutes, meeting invitation, email or letter request for disclosure that confirms this.</p>
3.5.6.2.	<p>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</p>	⊕	<p>The Social and Labor Plan and the Community Engagement Forum initial engagement meetings reflect a security briefing. In addition, there is a Mine Crime Combating Forum (MCCF) that meets monthly to discuss security issues (includes South Africa Police Service, private security, and mine security).</p>

Requirement #	Requirement Text	Rating	Basis for rating
	company's security arrangements and its efforts to manage security in a manner that respects human rights.		Human rights are discussed at the meetings. There is no evidence regarding annual reporting on security and human rights
3.5.6.3.	Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security.	●	<p>A grievance mechanism is publicly available in Sepedi and English (advertised in the Platinum Times newspaper and on fliers), and training is provided. Also, radio, community meetings, emails to stakeholders and calls share information about the mechanisms in place.</p> <p>"Your Voice" is available to any stakeholders and is confidential. It is included in the site induction, but because it is online it is not easily accessible for communities.</p> <p>The Community Engagement Forum will provide improved communication around security grievances, which was to be (and assumed to have been) implemented in 2022.</p> <p>The social performance team also has an open-door policy that encourages stakeholders to report any issues or grievances.</p>
3.5.6.4.	If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns.	●	Public security is only required by the mine in times of civil unrest. However, although a memorandum of understanding is in place with the two local South Africa Police Service stations, evidence does not demonstrate how public security arrangements are made public.
<b>Chapter 3.6—Artisanal and Small-Scale Mining</b>			
	Chapter Not Relevant	—	The nearest Artisanal and Small-Scale Mining activities occur ~80km from the Mototolo Complex, mostly in areas where the surface rights are not owned and secured.

Requirement #	Requirement Text	Rating	Basis for rating
<b>Chapter 3.7—Cultural Heritage</b>			
3.7.1.1.	Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals.	●	<p>Evidence indicates that due process is followed to identify competent professionals to undertake cultural heritage investigations, for example the cultural heritage impact assessment for Der Brochen (new) shafts. This is only relevant for Der Brochen operations (dating back to 2008), as the Mototolo operations were undertaken by another mining company, and no evidence of historical heritage assessment can be provided (and is likely to pre-date national heritage legislation).</p> <p>The mine is in the process of appointing a heritage specialist to collate all documents from existing records, verify and compile an overarching heritage management plan.</p>
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>The current processes (2019 - present) indicates that substantial stakeholder engagement with affected communities and stakeholders relating to the relocation of graves associated with the Der Brochen Operations. Little to no evidence of historical investigations under previous mine owner for Mototolo. The intention is to meet this requirement going forward through the development of an Integrated Heritage Assessment for the full site, including stakeholder and community consultations.</p> <p>Evidence of correspondence with the relevant community stakeholders was provided, which demonstrates consultations over grave locations and relocations associated with the Der Brochen operations.</p> <p>A heritage assessment and mitigation plan were carried out for Der Brochen. No evidence available for Mototolo (historical or current).</p> <p>In the next year, the mine plans to undertake an integrated heritage assessment that will include stakeholder and community consultations.</p>
3.7.1.3.	Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders	L	<p>Section 9.2 of the Chance Finds Procedure indicates reports will be made available to interested and affected parties, but it doesn't say specifically to whom.</p> <p>There is evidence of information sharing with trusts for the Der Brochen project.</p>

Requirement #	Requirement Text	Rating	Basis for rating
	who have been engaged with the mine site on cultural heritage issues.		Requirement 3a of SW3 enables stakeholders to engage with the mine on cultural heritage, and site commits to making information publicly available. All South African Heritage Resources Agency- (SAHRA)-related information is made publicly available on the SAHRA portal as legally required.
3.7.2.1.	Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities.	L	A specialist study included aspects such as graves, historical infrastructure, and archaeological specimens. Intangible aspects were identified through stakeholder engagement, which will feed into the new management plan. Social Way (requirement 4h) speaks to screening process requirements throughout lifecycle planning.
3.7.2.2.	If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected.	⊕	A specialist study included aspects such as graves, historical infrastructure, and archaeological specimens. Intangible aspects were identified through stakeholder engagement, which will feed into the new management plan. A chance find procedure is in place. Social Way (requirement 4h) speaks to screening process requirements throughout lifecycle planning. A scope of work is in place to develop the Integrated Heritage management Plan, which was to be (and assumed to have been) implemented in 2022. However, mitigation measures (consulted with stakeholders, etc.) are indicated for graves. There evidence does not support full compliance, as full mitigation has not been implemented .
3.7.3.1.	When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply: a. Minimize adverse impacts and implement restoration measures, in situ, that ensure	L	Der Brochen operations have demonstrated implementation of mitigation measures in line with this requirement. a. An engineering solutions report reflects efforts and planning to avoid graves and retain them in-situ. Archaeological excavations were mapped and fenced off. b, c, & d. There are ongoing discussions with family regarding grave relocation and grievance resolution.

Requirement #	Requirement Text	Rating	Basis for rating
	<p>maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it;</p> <p>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;</p> <p>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</p> <p>d. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage.</p>		
3.7.3.2.	All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.	●	Mitigation measures specific to graves are outlined in reports provided. Families have been engaged regarding graves, but no relocation or destruction has taken place yet.
3.7.4.1.	<p>The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:</p> <p>a. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and</p> <p>b. Any removal of cultural heritage is conducted using the best available technique.</p>	●	Grave relocation is planned according to best practice and in consultation with affected stakeholders. Heritage sites are avoided by fencing off and awareness raising.
3.7.4.2.	All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using	●	The evidence provided indicates that mitigation work has been undertaken by competent professionals.

Requirement #	Requirement Text	Rating	Basis for rating
	internationally recognized practices for the protection of cultural heritage.		Evidence indicates that graves were identified within part of the Mototolo footprint; however, no evidence of their relocation/protection is provided. Der Brochen operations relocated several graves, but there are disputes about procedure and benefits derived from this process.
3.7.5.1.	<p>Except under exceptional circumstances, the operating company shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:</p> <ul style="list-style-type: none"> <li>a. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and</li> <li>b. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. (Note: Where impacts may occur to indigenous peoples' critical cultural heritage, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples).</li> </ul>	—	None of the cultural heritage assessments identified resources of critical cultural heritage significance.
3.7.5.2.	<p>When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:</p> <ul style="list-style-type: none"> <li>a. Comply with the requirement 3.7.5.1;</li> <li>b. Comply with the protected area's management plan;</li> </ul>	—	None of the cultural heritage assessments or studies identified the operations as being not located in legally (or proposed) protected areas.

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>c. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and</li> <li>d. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area.</li> </ul>		
3.7.5.3.	<p>IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).</p> <ul style="list-style-type: none"> <li>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;</li> <li>• International Union for Conservation of Nature (IUCN) protected area management categories I-III;</li> <li>• Core areas of UNESCO biosphere reserves.</li> </ul>	—	None of the cultural heritage assessments or studies identified that the operations would affect World Heritage sites, International Union for Conservation of Nature, or UNESCO sites.
3.7.5.4.	<p>An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:</p> <ul style="list-style-type: none"> <li>a. The mine was developed prior to the area's official designation;</li> <li>b. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the cultural values for which the area was designated or recognized; and</li> <li>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan.</li> </ul>	—	Mine is not located within a protected area.

Requirement #	Requirement Text	Rating	Basis for rating
3.7.5.5.	To safeguard irreplaceable cultural heritage and respect indigenous peoples' right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation.	L	The operating company has not carried out new exploration or development in areas known to be inhabited by indigenous peoples living in voluntary isolation.
3.7.6.1.	Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development.	—	No evidence of Indigenous People in area. Only indigenous people are in the Northern Cape (>1000 km from site).
3.7.6.2.	The operating company shall not proceed with such commercialization unless it: <ul style="list-style-type: none"> <li>a. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and</li> <li>b. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions.</li> </ul>	—	Site and stakeholders interviewed did not identify any commercial use of knowledge.
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.	—	No evidence of Indigenous People in area. Only Indigenous People are in the Northern Cape (>1000 km from site).

Requirement #	Requirement Text	Rating	Basis for rating
3.7.7.1.	A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage.	⊕	The evidence provided indicates that mitigation and management procedures are in place for the Der Brochen operations. No evidence was provided for mitigation for Mototolo. An integrated heritage management plan was to be (and assumed to have been) implemented in 2022. In addition, no evidence of an assessment of intangible resources was provided.
3.7.7.2.	<p>If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b. Managing potential impacts to</li> <li>c. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and</li> <li>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.</li> </ul>	L	<ul style="list-style-type: none"> <li>a. A report for Richmond Road provides evidence of a procedure that was previously applied.</li> <li>b. The updated Chance Find Procedure includes contractor induction and training, and there have been meetings under the safety, health, and environment scope to include cultural heritage. Der Brochen is already included in the induction materials, and a video is currently under development to cover this. (This could be improved.)</li> <li>c. There is a grave visit register for historic visits (booking form).</li> <li>d. Not applicable - no Indigenous Peoples associated with the site.</li> </ul>
3.7.7.3.	The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management.	⊕	<p>The Chance Find Procedure indicates relevant employees should receive training on chance finds; however, this has not been implemented.; There is no evidence of training on cultural awareness offered.</p> <p>The Integrated Heritage Management Plan which was to be (and assumed to have been) implemented in 2022 addresses training requirements for the mine and site induction for Der Brochen reflects the new training taking place. (Neither have been implemented.) The introduction video for Der Brochen (shown at induction) includes a small section on heritage aspects.</p>



## Principle 4: Environmental Responsibility–APPENDIX

### RATING LEGEND

Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Requirement #	Requirement Text	Rating	Basis for rating
Chapter 4.1—Waste and Materials Management			
4.1.1.1.	The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities.	L	A waste management procedure is in place that clearly outlines the waste management hierarchy. The site has adopted the corporate Zero Waste to Landfill (ZW2L) strategy. As part of the Zero Waste to Landfill strategy, Interwaste Management company was tasked to develop a site-specific waste management guideline. Hazardous material handling is as per specified procedure and standard was developed for the site. The Anglo American Platinum Leaders Guide to Waste 2021 is signed by the CEO, raising awareness for the Zero Waste to Landfill initiative, along with general waste responsibilities and requirements. The site is a self-declared Zero Waste to Landfill site and received an external audit to determine achievement of this objective.
4.1.1.2.	The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum: <ol style="list-style-type: none"> <li>Having the policy approved by senior management and endorsed at the Director/Governance level of the company;</li> </ol>	L	In addition to the procedures and guidance documents identified above in 4.1.1.1., work is in progress at the group level to develop a mine waste minerals facilities management policy that will help the site align with the Global Industry Standard for Tailings Management (GISTM). The third quarter of 2023 is the timeline for compliance with the global tailings' standard. Currently, the

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>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;</li> <li>c. Having procedures and/or protocols in place to implement the policy; and</li> <li>d. Allocating a sufficient budget to enable the effective implementation of the policy.</li> </ul>		<p>Group Mineral Residue Facilities &amp; Water Management Structures Standard (to Anglo American Technical Standard 602001) is being followed.</p> <p>As is similar for other sites, a commitment to Zero Waste to Landfill is made and this is addressed in the Safety, Health, and Environment Policy, which is then supported by site strategy. A hazardous materials management standard has been developed from a similar group standard. Review of budget commitment considerations included documented budget needs for the Global Industry Standard on Tailing Management.</p>
4.1.2.1.	<p>The operating company shall:</p> <ul style="list-style-type: none"> <li>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</li> <li>b. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances, and wastes.</li> </ul>	L	<p>Interwaste Management company was tasked to develop a site-specific waste management Strategy Transportation, handling, storage and disposal of hazardous waste and substances are handled according to site Waste Management Procedure and Emergency response plan. The site has developed a site-specific materials and waste inventory coupled with a waste classification and management procedure. The site implements a hazardous materials management Standard developed from a group standard.</p>
4.1.3.1.	<p>The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities.</p>	L	<p>The site has identified all existing mine waste facilities that have the potential to be associated with waste discharges or incidents and has conducted corresponding risk assessments and Bowtie risk evaluation exercises. In 2021 the site updated the consequence ratings for both the Helena and Mareesburg tailings storage facilities and associated return water dams.</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"> <li>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);</li> </ul>	●	<p>Reporting was reviewed for the characterization of each mine waste facility and associated geotechnical and chemical risks. The report from 2015 consolidates the information from the 2005 pre-feasibility geotechnical investigation and the current geotechnical investigation. Most recent mine waste characterization was undertaken in 2015, as per the National Environmental Management: Waste Act and associated classification. As processes and facilities have not changed, there has been no need to update the characterization, which was also confirmed through recent quarterly risk reporting. There is no waste rock</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<p>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:</p> <ul style="list-style-type: none"> <li>i. Analysis of petrology, mineralogy, and mineralization;</li> <li>ii. Identification of geochemical test units;</li> <li>iii. Estimation of an appropriate number of samples for each geochemical test unit; and</li> <li>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.</li> </ul> <p>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;</p> <p>d. Water balance and chemistry mass balance models for each facility; and</p> <p>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants.</p>		<p>from the mine. A dense-media separation plant is planned as part of the Der Brochen project and is in the design phase, so characterization for this is not yet available.</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"> <li>a. Detailed engineering reports, including site investigations, seepage and stability analyses;</li> <li>b. Independent technical review (See criteria 4.1.6)</li> <li>c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment;</li> </ul>	●	<p>A technical review was undertaken by a technical review panel appointed by Anglo American Platinum in December 2020. The Anglo American Findings Tracker is used to document the actions from this and other internal reporting. A review of the findings tracker shows that a high number of the actions have been delayed, including 7 of 13 actions resulting from the Technical Review Panel review for Maresburg Tailing Storage Facility. No justification or reason has been provided, and revised completion dates have not been committed to in the finding's tracker. The Operational, Maintenance, and Surveillance Manual for the Mototolo concentrator was updated in September 2021, as a result of ongoing monitoring and analysis of data. The consequence classification of structures (CCS) is undertaken for each facility, and the design criteria are based on the consequence classification and informed by dam breach inundation studies. The design reports consider the risk level, and the MRF Standard informs the design criteria. As per the Anglo American Standard</p>

Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>d. Descriptions of facility design criteria;</li> <li>e. Design report(s);</li> <li>f. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns;</li> <li>g. Master tailings placement plan (based on life of mine);</li> <li>h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report;</li> <li>i. Facility water balances (See also 4.1.3.2.d); and</li> <li>j. Dam breach inundation (if applicable) and waste rock dump runout analyses.</li> </ul>		<p>(AATS 602001) Mineral Residue Facilities and Water Management Structures Standard and Technical Specifications, the Consequence Classification of Structures (CCS) rating for Mareesburg Tailings Storage Facility and its return water dam complex were reviewed during workshops on the 29<sup>th</sup> of July and 15<sup>th</sup> of September 2021. These workshops were attended by the Closure Plans, the Engineer of Record, other members of SRK Consulting, Anglo American and Fraser Alexander Tailings. In addition, the Classification of Structures rating for Mareesburg Tailings Storage Facility was also assessed in the context of the specifications in the Global Industry Standard on Tailing Management (GISTM). The outcome was that Mareesburg Tailings Storage Facility is identified as a “very high” rated facility.</p>
4.1.3.4.	Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.	⊕	<p>Chemical characterization hasn’t been undertaken since 2015, as there have not been any changes to processing since then. An action plan is in place to address the Technical Review Panel recommendations and is being updated. However, none of these recommendations are related to facility characterization, and implementation of the recommendations does not relate to this requirement. Groundwater monitoring analysis is conducted quarterly. Quarterly reporting reviewed finds design features comparable with previous quarter conditions. Therefore, no need was identified for updating facility characterizations.</p> <p>An independent contractor has been responsible for developing the local refined Helena Tailings Storage Facility and larger Mototolo/Der Brochen numerical groundwater flow and transport models and has been appointed to perform the annual groundwater model update. The latest report from May 2021 includes recommendations that have not yet been fully implemented by the site. While the site characterization is being updated, no evidence was identified to show that the updated characterization is informing waste management and reclamation decisions.</p>
4.1.3.5.	Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be	L	The use of predictive tools and models for site and facility characterization are in line with industry best practice and are being updated over the life of the mine as site characterization data and operational monitoring data are

Requirement #	Requirement Text	Rating	Basis for rating
	continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected.		collected. Site characterization is currently being updated for groundwater. Chemical characterization hasn't been undertaken, as there have not been any changes to processing since the last characterization in 2015.
4.1.4.1.	<p><b>Critical</b> A risk-based approach to mine waste assessment and management shall be implemented that includes:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>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</li> <li>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c).</li> </ul>	L	<p>The August 2010 Design Report for the Helena Tailings Storage Facility (TSF) was provided for review. The Helena Tailings Storage Facility has been operational since 2006 but is now at its end of life. The newer Maresburg Tailings Storage Facility, operational since 2018, is in its first phase; the second phase is being developed. Maresburg has a design life currently planned for 2060. There is a Tailings Facility Risk Assessment and a Life Cycle Workplace Risk Assessment and Control for each Tailings Storage Facility (Life Cycle Workplace Risk Assessment and Control), and these assessments appear to be complete.</p> <p>Comprehensive risk assessments have been undertaken for all Tailings Storage Facilities, including zones of influence. The risk-based assessment for mine waste identifies chemical and physical risks; and potential impacts are variously documented across a number of studies and reports. Most information is seen to be updated regularly according to the risk profile. A Bowtie analysis of each Tailings Storage Facility has been completed as of June 2021. Site interviews and observations identified that critical controls have been implemented and are being monitored.</p>
4.1.4.2.	<p>The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives;</li> </ul>	●	<p>Specialist studies are done as part of Environmental Impact Assessment and Environmental Management Plan approval initially for mine waste facilities. Helena Tailing Storage Facility (TSF) and Maresburg Tailings Storage Facility both now predate 2018 and no changes or extensions have been/are being proposed to the Tailings Storage Facility design, so alternatives analysis is of limited scope/need.</p> <p>For the stability assessment of the TSF slope stability software analyzed the Factor of Safety (FOS) of the slopes of the Tailings Dam.</p> <p>Design reports for the Helena Tailings Storage Facility, dated August 2010 were provided for review.</p> <p>The Helena Tailings Storage Facility operational from 2006 is now at its end of life.</p>



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	<ul style="list-style-type: none"> <li>c. Carry out a screening or “fatal flaw” analysis to eliminate alternatives that fail to meet minimum specifications;</li> <li>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.</li> <li>e. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and</li> <li>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).</li> </ul>		<p>The newer Mareesburg Tailings Storage Facility (from 2018) is in its 1st phase; ph2 is being developed. Coarse tailings are destined for the dam walls to improve stability and fine tailings are laid in the lined basin. Mareesburg has a design life to 2060. The Design Report of 8/20 addressing expansion of the Tailings Storage Facility to phases 2 &amp; 3.</p> <p>The consequence classification of structures (CCS) is undertaken for each facility, and the design criteria are based on the consequence classification (and informed by Dam Breach Inundation Study/ies). The design reports support consideration of the risk level. Mineral Residue Facility Standard informs the design criteria.</p> <p>Geochemical testing by Waterlab (Pty) Ltd, a SANAS (South African National Accreditation System) accredited laboratory of tailings, ore, and waste rock show material to be non-acid generating based on their limited sulfur content respectively acid potential, which is generally compensated by the low, though sufficient neutralization potential of the tested samples.</p> <p>Specialist studies are done as part of environmental impact assessment and environmental management plan approval initially for mine waste facilities. The Helena Tailings Storage Facility and the Mareesburg Tailings Storage Facility both now predate 2018 and no changes or extensions have been/are being proposed to the tailing storage facility design, so alternatives analysis is of limited scope/need.</p> <p>For the stability assessment of the Tailing Storage Facility facilities, slope stability software analyzed the Factor of Safety (FOS) of the slopes of the Tailings Dam. Design reports for the Helena Tailing Storage Facility, dated Aug 2010, were provided for review. The Helena Tailing Storage Facility has been operational since 2006 and is now at its end of life.</p> <p>The newer Mareesburg Tailing Storage Facility (from since 2018) is in its 1st first phase 1; and phase 2 is being developed. Coarse tailings are destined for the dam walls to improve stability, and fine tailings are laid in the lined basin. Mareesburg has a design life to 2060. The Design Report of 8/20 addresses expansion of the Tailings Storage Facilities to phases 2 &amp; 3.</p> <p>The consequence classification of structures is undertaken for each facility, and the design criteria are based on the consequence classification (and are informed by the Dam Breach Inundation Study). The design reports support consideration of the risk level. The Mineral Residue Facilities Standard informs the design criteria.</p>

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			<p>Geochemical testing of tailings, ore, and waste rock, by Waterlab (Pty) Ltd, a South African National Accreditation System (SANAS) accredited laboratory, showed material in the tested samples to be non-acid generating.</p> <p>On the recently constructed Tailings Storage Facility, a leak/spill detection plan is to be devised and implemented for all possible areas of leak/spillage within the construction site.</p>
4.1.5.1.	<p><b>Critical</b> Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).</p>		<p>The Design Report for the recently designed and constructed Mareesburg Tailings Storage Facility was based on best available technologies (e.g., for Mareesburg Tailings Storage Facility liner systems applied). Additional innovations were also applied in the development of an impermeable layer below the liner, with low friction resistance so stability bands were applied in the basin to provide resistance to sliding. Different assessments were undertaken including 3D seepage assessments, dynamic deformation modelling, seismic assessments etc. to mitigate potential liquefaction triggered by a seismic event - Based on international best practices. Also, fiber optic cables are understood to be installed to monitor strains and leakage through the liner via temperature differences. The site has conducted a gap assessment against the Global Industry Standards on Tailing Management guidelines and has developed a timeline for the implementation of Global Industry Standards of Tailing Manager guideline improvements.</p> <p>The Design Report for the recently designed and constructed Mareesburg Tailings Storage Facility was based on the Best Available Technologies (BAT) (e.g., for Mareesburg Tailings Storage Facility liner systems were applied). Additional innovations were also applied in the development of an impermeable layer below the liner, with low friction resistance, so stability bands were applied in the basin to provide resistance to sliding. Different assessments were undertaken including 3D seepage assessments, dynamic deformation modelling, seismic assessments, etc., to mitigate potential liquefaction triggered by a seismic event. This was based on international best practices. Also, fiber optic cables are understood to be installed to monitor strains and leakage through the liner via temperature differences. The site has conducted a gap assessment against the Global Industry Standard on Tailings Management guidelines and has developed a timeline for the implementation of the Global Industry Standard on Tailing Management guideline improvements.</p>

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			<p>Aside from tailings-related waste facilities, onsite tours of other mine waste facilities, including salvage yards, workshop areas, etc., identified practices not considered to be best available/applicable. Infrastructure for the containment and collection of hydrocarbon waste is not considered best practice to prevent contamination of the surrounding environment.</p>
4.1.5.2.	<p>Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:</p> <ol style="list-style-type: none"> <li>a. Priority shall be given to source control measures to prevent generation of contaminants;</li> <li>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</li> <li>c. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes.</li> </ol>	L	<p>A policy for managing mineral residue was being drafted by Anglo American, Group Technical and Sustainability and was due for implementation in 2022. In the meantime, the Mineral Residue Facilities standard was implemented to ensure safe design and operation of mine waste facilities. Evidence was provided to aid the following understanding of practice:</p> <ul style="list-style-type: none"> <li>- Helena Tailings Storage Facility (HTSF) is not lined, but Maresburg Tailing Storage Facility (MTSF) is lined, thus complying with 2018 regulations.</li> <li>- Maresburg Tailing Storage Facility source control was applied via non-harmful chemicals being used, and a barrier system was installed.</li> <li>- Monitoring boreholes are in place to ensure systems are effective and identify leakages/seepage.</li> <li>- Avoidance was applied and reflected in the Design Report.</li> <li>-No waste rock is extracted from underground, to minimize potential generation of contaminants.</li> <li>-Scavenger wells are in place to extract the plume from the Helena Tailings Storage Facility</li> <li>- Reflected in the process design (mine and concentrator).</li> </ul> <p>The Engineer of Record (EoR) updates the Design Basis Report every time there is a:</p> <ul style="list-style-type: none"> <li>- Material change in the design input parameters, design criteria, knowledge base</li> <li>- Series of cumulative changes forms a material change to the design approach or input parameters etc.</li> </ul> <p>The Design Basis Report confirms and documents internal consistency among the above elements in order to satisfy the Global Industry Standard on Tailing Management requirement. Tailings from Helena Tailings Storage Facility or Maresburg Tailings Storage Facility are reported to be not hazardous and are classified as seen in the Barrier Design Report SRK 7.3.3L, 2015. There has been</p>

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			no regulatory requirement to update this data since. Monthly monitoring does not cover the same parameters (Cr, Mn, Co, As, Cu, Va, Ni) but checks are made on the quality of surface waters in accordance with the site's general characteristics.
4.1.5.3.	For high consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide.	L	A Bowtie risk analysis with critical controls implemented and monitored is in place for both Tailings Storage Facilities. The process is similar to what is recommended in the Mining Association of Canada Guide to Tailings Management (2017). The site's Emergency Preparedness and Response Plan defines the potential for accidents, to describe the actions required in the event of an emergency, and to prevent/mitigate environmental and safety impacts associated with emergency situations. The Tailings Management & Standard Implementation Management Framework (Anglo American Tailings Management Framework) sets out policy, the implementation position, and phases to ensure reliable Tailings Storage Facility management, against the existing Anglo American TS602 and the pending Global Industry Standard of Tailing Management requirements.
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.	L	Evidence of the Mineral Residue Facilities Standard was shared, which highlights the requirements for Mineral Residue Facilities (MRFs) management, water containment, and water diversion structures management at Anglo American, throughout the life cycle, from site selection and early studies, through design and operation, to post-closure. The Technical Review Panel documents and other documents demonstrate inter-disciplinary approaches applied.
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: <ul style="list-style-type: none"> <li>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;</li> </ul>	M	Evidence of the Mineral Residue Facilities (MRF) standard was shared which highlights the requirements for MRF management, water containment, and water diversion structures management from site selection and early studies, through design, operation, and post-closure. The site further reported that the Operational, Maintenance, and Surveillance Manual was developed by the Engineer of Record and reviewed by the site. Operation, maintenance, and surveillance manuals that address sub requirements A through E, were provided and reviewed for the Helena Tailing Storage Facility and the Mareesburg Tailing Storage Facility. The Operational, Maintenance and

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	<ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and</li> <li>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.</li> </ul>		<p>Surveillance Manual draft for Mareesburg Tailing Storage Facility is signed by authors in 2018, but other signatories have not yet signed, so a fully approved version is not officially yet in circulation. Upstream elements will be added, for example, repair and maintenance work (e.g. storm water channels). Critical controls are managed via IsoMetrix with associated performance criteria and indicators.</p>
4.1.5.6.	<p><b>Critical</b> On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> <li>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);</li> <li>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);</li> <li>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and</li> <li>d. Inform the management review to facilitate continual improvement (see 4.1.5.8).</li> </ul>	L	<p>The site provided multiple reports related to the inspections undertaken on the dams and storage facilities. Performance objectives are being checked, and the effectiveness of risk management measures, including critical controls and updates to the risk management process, are being checked on a regular basis; this information is being fed into management review.</p>



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4.1.5.7.	The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities.		The Operational, Maintenance, and Surveillance Manual is reviewed annually and if there are material changes to a procedure due to incident. After incident investigation where there is learning, the mine includes the learnings into the procedures, e.g., sinkhole into the penstock). The Operational, Maintenance, and Surveillance Manual was reviewed after the safety concern at Helena Tailings Storage Facility. Critical control strategy was recently updated in response to changes at the site level. Items that require updating are logged in the quarterly meeting minutes to ensure they are implemented, as per minutes of Quarterly Meetings.
4.1.5.8.	The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall: <ul style="list-style-type: none"> <li>a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and</li> <li>b. Be documented, and the results reported to an accountable executive officer.</li> </ul>	L	Annual dam safety reviews are undertaken, and continual improvement opportunities are being identified. The Gap Analysis for Mineral Residue Facilities and Global Industry Standards on Tailing Management were undertaken to inform the update process.
4.1.6.1.	The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle.	L	The Tailings Review Panel undertakes independent review, with terms of reference in place. A statement of independence was provided by the consulting geotechnical and tailings engineer.
4.1.6.2.	Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste		The mine identified the need to improve the diversity of expertise regarding panel members. Site representatives reported that the Technical Review Panel consists of two panel members for annual technical review. The requirement dictates it should be a minimum of three members. Dam safety review is required and is being initiated. Also, a senior independent reviewer, not from

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	facilities, a panel of three or more subject matter experts shall comprise the independent review body.		the local office, was on-site the week of November 22-26, 2021. The panel should have a minimum of three members to ensure technical depth and impartiality, but only two members attended the panel.
4.1.6.3.	Independent reviewers shall be objective, third-party, competent professionals.	L	CVs and statements/declarations of independence were provided by the independent reviewers.
4.1.6.4.	Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner.	L	Technical panel review reports are being reviewed by the site's general manager and head of mineral residue facilities.
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>An Action Plan is developed for the independent reviewer's recommendation and tracked via the Enablon system. Previous Technical Review Panel recommendation progress is also presented during the panel review. As noted in 4.1.3.3, a technical review was undertaken by a Technical Review Panel appointed by Anglo American Platinum, (report dated December 2020). The Anglo American findings tracker was used to document the actions from this and other internal reporting. A high number of the actions were delayed, e.g.,</p> <ul style="list-style-type: none"> <li>- Maintenance program for flow meters.</li> <li>-Color coding of for reporting critical controls</li> <li>-Helena Tailings Storage Facility emergency action plan resources &amp; implementation effectiveness not verified</li> <li>-Helena Tailings Storage Facility collapse failure mode design philosophy/risk management approach that is not reducing uncertainties sufficiently</li> <li>- Design review (Technical Review Panel should be commissioned to review Phase I design report)</li> <li>-Stormwater diversion embankment instability</li> <li>-Monitoring of water table below liner</li> </ul> <p>These actions were originally due by the end of September and November 2021, but the programs had been extended. 7 of 13 actions resulting from the</p>



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			Technical Review Panel review for Maresburg Tailings Storage Facility were delayed. Justification was provided.
4.1.7.1.	Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities.	L	Public participation process is undertaken as part of the Environmental Impact Assessment process for any expansion/construction of a waste facility. The site has the relevant stakeholder engagements documents in place as part of the Environmental Impact Assessment process.
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).		Engagement with various stakeholders is undertaken with respect to emergency preparedness and response. Attendance registers and letters confirm correspondence, and direct engagement with stakeholders immediately impacted by the revised consequence rating and inundation study were provided and reviewed. A desktop simulation drill was conducted in November 2021; however, no evidence was provided of stakeholder participation.
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).		While a desktop simulation of the emergency response process took place in November 2021, the site reported that evacuation drills have not yet been undertaken. The plan is to have them done after the stakeholder engagement process. No provision of a timeline was provided to highlight the planning.
4.1.7.4.	If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies.	L	Evidence was provided that the results of the Environmental Management Plan performance assessment audit were shared with relevant stakeholders.
4.1.8.1.	<b>Critical</b> At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA.	L	The mine does not use riverine, submarine or lake disposal of mine waste materials.

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<b>Chapter 4.2—Water Management</b>			
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.	L	<p>Anglo's Group Water Policy states that it is committed to securing water without compromising water resources and other users and engaging to build capacity for effective water partnerships. This is backed up by technical and procedural information in the group Water Management Standard and associated guideline. The site participates in water user group forums, including the River Catchment Forum, which coordinates issues around the catchment (mining sites); the local Municipality Environmental Forum; the Joint Water Forum and the Oliphants Catchment Forum. Users represented at these forums range from other mining sites to ranchers and broader commercial and residential users.</p> <p>The site has also entered into an agreement with the Department of Water and Sanitation (DWS) with respect to these forums, through a "Memorandum of Intent between Commercial Users Consortium and the Department of Water and Sanitation to Jointly and severally Finance, Build, Operate and Maintain Plifants River Water Resources Development Project Phase 2 and Potable Water Infrastructure, as envisaged in the proposal."</p>
4.2.1.2.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices.	L	<p>The site participates in several local and regional catchment forums, comprising other mine operators, industrial users, farmers, and residential stakeholders. The site has developed a water balance model, and is committed to sharing with the water forum, who is then developing a catchment water balance model. The 'Limpopo Water Resources Study' of 3/19 presents water resource scenario analyses to quantify the climate change risk to future rainfall and evaporation and influence on water resource availability for the Limpopo region.</p> <p>It does not specifically identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices. The 'Water Management: Strategic Assessment 2020' is intended to be a live document, updated annually to make provision via water balance scenarios for the growing water needs of the urban, industrial, and mining water use sectors for the entire catchment, informed by the Joint Water Forum (JWF).</p>



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4.2.1.3.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels and shall take steps to contribute positively to local and regional water stewardship outcomes.	L	<p>Through its participation in the water catchment forums and direct stakeholder engagement, the site is identifying stakeholder water challenges, and opportunities and issues are tracked in ISO metrics. Recent evidence of collaborating with relevant stakeholders includes meetings regarding mass water balance for Dwars River Catchment. Each mine in the area has a representative at this forum. Catchment water balance was established in 2019, and at the end of 2019 the first balance had developed.</p> <p>The initial task for each catchment member mining operation was to develop their own water balancing information and water usage from the river. A consultant is hired by the forum to develop the water balance for the catchment. The intent will be to develop targets that will then become requirements for each of the mine operators in the catchment. The Department of Water Affairs participates and encourages developing this forum.</p>
4.2.2.1.	<p>The operating company shall gather baseline or background data to reliably determine:</p> <ul style="list-style-type: none"> <li>a. The seasonal and temporal variability in: <ul style="list-style-type: none"> <li>i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project;</li> <li>ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwater) that may be affected by the mining project; and</li> </ul> </li> <li>b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project.</li> </ul>	●	The independent Aquatic Ecological Assessment conducted in February 2018 defined the Present Ecological State (PES) and the Ecological Importance and Sensitivity (EIS) of the Groot Dwars River and its unnamed tributary associated with the Anglo Platinum Der Brochen Project. The Environmental Impact Assessment and Environmental Management Program report of 11/19 supports operating permits for mining operations. Both establish baseline conditions for a physical, chemical, and biological profile, and flow and volume conditions of surface and groundwater, respectively. More information should be established on sources of contamination and changes in water quantity or quality that are unrelated to the mining project.
4.2.2.2.	The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future	●	The independent Aquatic Ecological Assessment conducted in February 2018 defined the present ecological state and the ecological importance and sensitivity of the Groot Dwars River and its unnamed tributary associated with the Anglo Platinum Der Brochen Project. This and the 'The 'Freshwater Resource Ecological Assessment for The Proposed Anglo Platinum Der Brochen

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	<p>water uses. The scoping process shall include evaluation of:</p> <ul style="list-style-type: none"> <li>a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and</li> <li>b. The mine's use of water, and any mining activities that may affect water quantity.</li> </ul>		<p>Expansion Project' rev 8/19 informed the overall Environmental Impact Assessment (EIA) report of 11/19 in support of operating permits for the mining operations. The studies establish baseline conditions for a physical, chemical, and biological profile, and flow and volume conditions of surface and groundwater, respectively. More information should be established on sources of contamination and changes in water quantity or quality, and collaboration should occur with relevant stakeholders in identifying potential impacts.</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"> <li>a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources;</li> <li>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);</li> <li>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</li> <li>d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure.</li> </ul>		<p>A number of additional hydrogeological studies have been carried out to determine baseline geohydrological conditions and probable water-related impacts, and to propose management plans and monitoring protocols to manage potential water-related impacts. The management plans are informed by water balance simulation studies and modeling. Further information to predict whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure would supplement to fulfil this requirement.</p>
4.2.2.4.	<p>Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected.</p>		<p>Water balance reports and a groundwater flow and transport model, in response to findings from detailed assessment studies, are available. During the on-site assessment, the site had just developed, approved, and was in the process of implementing its new Adaptive Water Management Plan.</p>



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4.2.3.1.	The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.	L	The site participates in several local and regional catchment forums, comprising other mine operators, industrial users, farmers, and residential stakeholders. The site has also signed a memorandum of intent with a commercial users' consortium and the Department of Water and Sanitation to develop potable water improvements in the catchment. Further commitment by the site has also been made within these forums to identify and achieve catchment-wide water quality guidelines and targets.
4.2.3.2.	<p>If a surface water or groundwater mixing zone is proposed as a mitigation strategy:</p> <ul style="list-style-type: none"> <li>a. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and</li> <li>b. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum: <ul style="list-style-type: none"> <li>i. Surface water or groundwater mixing zones are as small as practicable;</li> <li>ii. Water in a surface water mixing zone is not lethal to aquatic life;</li> <li>iii. A surface water mixing zone does not interfere with the passage of migratory fish;</li> <li>iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume,</li> </ul> </li> </ul>	—	The 'Environmental Impact Assessment & Environmental Management Program Report' of 11/19 does not refer to ground surface water mixing, and the 'Consolidated Environmental Management Program' report of 3/12 does refer to the need to prevent 'clean water generated up-gradient of the plant site from mixing with dirty water generated at the site,' but this is not specific to a surface mixing zone and is considered be out of date. The site visit determined that a surface water or groundwater mixing zone has not been proposed as a mitigation strategy.

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	<p>and that this substitution is agreed to by all potentially affected water users; and</p> <p>v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable.</p>		
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> <ol style="list-style-type: none"> <li>Being maintained at baseline or background levels; or</li> <li>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).</li> </ol>		<p>The Water Use License (WUL) (License no.24072959) 04/11 and amended License of 05/16, for Der Brochen /Mototolo Concentrator stipulate water quality target values for the Dwars River and for wastewater. Monthly water quality monitoring by external providers (GCS and Exigo) provides data to check on conformance with regulatory limits as per water use licensing. The 'Progress Report for Mototolo Concentrator and Mareesburg Water Quality Monitoring' of 3/21, for Lebowa (North) 3/21 and for Borwa South 3/21 summarize monthly monitoring against the water quality targets. Data provided for Mototolo Shafts and for Mototolo Concentrator show exceedances against the Water Use License limits for several parameters over the years, including some data for 2021.</p>
4.2.3.4.	<p>Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2).</p>		<p>Feedback during interviews with site personnel suggest that the site believes water monitoring data for Mototolo indicates that baseline water quantity and water quality levels are being met. The monitoring results in both the Lebowa (North) 3/21 and for Borwa South reports 3/21 indicate water use well below that permitted level as per the Water Use License (&lt;1000m3 vs 39000m3). Other monitoring reports do not present water use data, although the groundwater levels in the Concentrator Report indicate stable trends observed at most boreholes during April and May 2021. Water quality and use guidelines are currently being established at a regional level within the catchment forum in which the site participates. Limits and guidelines are intended to be binding on all the catchment forum member mining operations.</p> <p>The site has also revised its water quality monitoring procedures to include limits established within the IRMA water tables. Limits selected within these tables are considered by the site to be more in line with the current uses of</p>



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			water resources in the region. The site intends to pursue updates to its water use license that are also more in line with these uses.
4.2.4.1.	<p><b>Critical (a through e)</b> 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"> <li>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);</li> <li>b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics;</li> <li>c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics;</li> <li>d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;</li> <li>e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and</li> <li>f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables.</li> </ul>	●	<p>The site has established the "Mototolo Complex Water Sampling, Monitoring and Reporting Procedure v9.0." Appendix A Monitoring Locations includes locations of monitoring boreholes, water supply boreholes, surface water, dirty water dams, an oil storage facility, hydrocarbon monitoring locations, equipped boreholes, dikes, and ephemeral drainages. The monitoring and sampling program is implemented by a contractor who completes the required sampling and reporting, including quarterly reports supported by accredited lab analysis.</p> <p>During the on-site assessment, the site had completed and was in the process of approving the Trigger Action Response Plan (TARP) that includes the values in the IRMA Water Quality Criteria by End-Use. Formal approval and adoption of the water quality Trigger Action Response Plan (TARP) is still pending, along with evidence of the effective implementation of the Trigger Action Response Plan. The site will also be requiring lab analysis to report on sampling results against the IRMA Water Quality Criteria by End-Use.</p>
4.2.4.2.	Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific	●	Evidence provided and that above demonstrate the comprehensive sampling and analysis regime that is in place, underpinned by impact assessment studies and enforced by the water use license(s). Limits established in the water use license were also reviewed against the required sampling and reporting



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	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.		frequencies. At the time of the assessment, IRMA water quality limits had just been integrated into the draft Adaptive Water Management Plan.
4.2.4.3.	<p>The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:</p> <ul style="list-style-type: none"> <li>a. Participation may involve the use of independent experts selected by the community; and</li> <li>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.</li> </ul>		<p>Mototolo, in collaboration with affected stakeholders, appointed an independent expert to undertake a monitoring program to assess and evaluate mining-related impacts in the local basin. Evidence of Mototolo's contribution to this study was also attached. The 'Mass and Salt Balance Determination for the Dwars River Catchment' prepared for Dwars River Environmental Forum in July of 2020 is a study to identify the source and determine the salt load contributed by each mining unit to the Dwars River, including Mototolo. This is to help identify problem areas within their control and contribute to a reduction. There is no reference to other quality parameters that may have been impacted, and this and a wider view of potentially affected stakeholders, should be explored during the site visit.</p>
4.2.4.4.	<p><b>Critical</b> The operating company shall develop and implement an adaptive management plan for water that:</p> <ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul>		<p>The 2020 Water Management Plan (WMP) outlines actions to be taken by the site on a yearly basis to mitigate water risks in the context of identified and predicted deficits underpinned by flow modelling to simulate groundwater flow/discharge volumes into the mine workings over the life of mine. The Water Management Plan does not specify adapt management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, but does refer to applying adaptive management when required based on continuous monitoring of rainfall and evaporation and five yearly statistical analyses to track observed trends and variance in these.</p> <p>The mine has developed the "Water Adaptive Management Plan." During the Stage 2 on-site assessment in May 2022, this document was in draft and not yet approved by the site for use. Trigger response actions and adaptive management are outlined in the plan and work in conjunction with the "Anglo American Platinum 2022 Operating Framework and Recommended Implementation Measures." In addition to proposed water use license limits,</p>

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			<p>trigger limits also include IRMA Water Quality Criteria. Triggers and actions are established based on green, yellow, orange, and red levels, indicating the level of severity and corresponding action required based on the severity of the trigger level. Timelines for action completion were not indicated in the plan document.</p> <p>The Water Adaptive Management Plan has been developed as of May 2023.</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.	●	During the time of the on-site assessment, the site was in the process of finalizing and approving the Anglo American Platinum Der Brochen Monitoring Procedures & Adaptive Management Plan. This new plan includes detailed trigger response action plans that incorporate both regulatory (WUL) limits and the IRMA Water Quality Criteria. The site intends to incorporate the IRMA Water Quality Criteria into its accredited lab analysis scope of work on regular water quality monitoring reports.
4.2.4.6.	Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans.	⊗	The Water Management Plan (WMP) outlines actions to be taken by the site on a yearly basis to mitigate water risks in the context of identified and predicted deficits. The WMP does not specify adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, but does refer to applying adaptive management when required based on continuous monitoring of rainfall and evaporation and five yearly statistical analyses to track observed trends and variance in these. It is not known if community stakeholders are provided with the opportunity to review any adaptive management outputs or participate in revising the plans. This will be followed through during the stakeholder engagement phase of the site visit.
4.2.5.1.	The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities: a. Monitoring data for surface water and groundwater points of compliance; and	⊗	Based on the evidence provided, there is no publishing of baseline or background data on water quantity and quality, nor is there evidence of stakeholder consultation over this. The annual environmental social and governance (ESG) reports present consolidated data from across all operations; other localized publications examples will be provided.

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	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.		
4.2.5.2.	The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders in the event that there are changes in water quantity or quality that pose an imminent threat to human health or safety, or commercial or natural resources.		<p>The Safety, Health, and Environment Way Operations Specification specifies that stakeholders, neighbors, and regulatory agencies must be informed of the requirements of the emergency situation arrangements and of their respective duties and responsibilities in the situation. The Complex Emergency Response Plan (currently under review) defers responsibility to the Anglo American Process Change Management team (Johannesburg office) for media and other external stakeholder communications. For incidents and disasters, it does include an action for the plant manager to establish communication arrangements, and for spillages from tailings. Protection services in conjunction with the social performance manager will inform the affected communities. The recently revised Monitoring Procedures and Adaptive Management Plan identifies the required level of response based on the type of water quality issue identified through the trigger action response plans. The effectiveness of these response plans has not yet been determined.</p> <p>Procedures for communicating changes in water quality that pose an imminent threat should be followed through during the site visit.</p> <p>Procedures for communicating changes in water quality that pose an imminent threat should be followed through during the site visit.</p>
4.2.5.3.	The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders.		<p>The Water Management Plan is reviewed annually including any adaptive planning actions through ongoing review of rainfall/evaporation monitoring and five yearly statistical analyses to track observed trends. It is not known if discussions with relevant stakeholders take place on water management strategies or performance and adaptive management issues, except for the salt load issue and reporting with DREF. The site has recently developed and approved the Monitoring Procedures and Adaptive Management Plan that includes Trigger Action Response Plans related to water use license limits and the limits established and identified as applicable to the site in the IRMA water tables. No evidence was available to determine how the site has engaged</p>

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			stakeholders for feedback with respect to the Monitoring Procedures and Adaptive Management Plan.
<b>Chapter 4.3—Air Quality</b>			
4.3.1.1.	The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations.	●	<p>The Anglo American Air Quality Standard requires that 'each site shall develop and maintain an annual emissions inventory of its regulated emissions' for its entire life cycle and demonstrate to relevant Air Quality Reference Standards using air dispersion modelling where necessary to do so.</p> <p>As part of the environmental impact assessment process, specialist studies such as air quality monitoring are undertaken. Following on from the monitoring, the mining company is expected to establish an Air Quality Management Plan. The existing plan only considers the concentrator. The intent is for the Mototolo Complex to have one consolidated Air Quality Management Plan; hence, the commencement of the process to have the Air Quality Management Plan revised.</p>
4.3.1.2.	During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area.	●	<p>The 'Environmental Impact Assessment &amp; Environmental Management Program Report' of 11/19 (submitted for environmental authorizations) and the 'Air Quality Impact Assessment for the Der Brochen Expansion Project' in 8/19 both relate to the Der Brochen expansion only. The studies were to assess and, where possible, quantify possible impacts of the project activities on the surrounding environment and human health. The Anglo American Air Quality Standard requires that 'each site shall develop and maintain an annual emissions inventory of its regulated emissions' for its entire life cycle and demonstrate to relevant Air Quality Reference Standards using air dispersion modelling where necessary to do so.</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	●	<p>The 'Environmental Impact Assessment &amp; Environmental Management Program Report' of 11/19 (submitted for environmental authorizations) and the 'Air Quality Impact Assessment for the Der Brochen Expansion Project' in 8/19 both relate to the Der Brochen expansion only. The studies were to assess and,</p>

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	an assessment to predict and evaluate the significance of the potential impacts.		<p>where possible, quantify possible impacts resulting from the project activities on the surrounding environment and human health.</p> <p>The Air Quality Management Plan is in the process of being revised. Part of the scope for the new Air Quality Management Plan also includes further specialist studies and dispersion modelling. As of early May 2022, quotes were still in the process of being obtained.</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.		The impact assessment reports, and Air Quality Management Plan identify potential impacts on the environment and health, although the submitted Environmental Impact Assessment is for the Der Brochen expansion only. The Air Quality Impact Assessment for the Der Brochen Expansion included an Impact Prediction Study for particulates and dust fall, simulated using a USEPA-approved American Meteorological Society/Environmental Protection Agency Regulatory Model dispersion modelling suite. The Air Quality Management Plan relates to the concentrator and includes dispersion simulation using the same model.
4.3.2.1.	<b>Critical</b> If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.		The mine stated that the Air Quality Management Plans for the concentrator and Tailings Storage Facility were developed. At the time of Stage 2, the Request for Qualification process had commenced to appoint an appropriate consultant to establish a complex Air Quality Management Plan The '46986-Mototolo Joint Venture Concentrator Air Quality Management Plan' (developed by an external consultant) applies to the concentrator only and is dated 2016 so may now be out of date. There is also an Air Quality Management Plan for Der Brochen Scope of Work (not rated). During the future site visit, further information can be checked including the aspects register, monitoring plan and any updated Air Quality Management Plan. The Anglo American Air Standard requires that 'the Air Quality Management Plan shall clearly define the site's air quality control strategy and objectives, timeframes for implementation of controls, resources available to achieve objectives, and the communication process with interested parties. The evidence provided (Air Quality Management Plan for the Concentrator) does not achieve this and it is not known if there is a separate, more detailed plan based on the Air Quality Management Plan.

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4.3.2.2.	Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life.		<p>The '46986-Mototolo JV (Joint Venture) Concentrator Air Quality Management Plan' (developed by an external consultant) applies to the concentrator only and is dated 2016 and is currently out of date. Whilst the mine's existing monitoring program addresses the entire complex, the mine has already identified that an update to the existing Air Quality Management Plan is required.</p> <p>The Air Quality Management Plan is in the process of being revised. Part of the scope for the new Air Quality Management Plan also includes further specialist studies and dispersion modelling. As of early May 2022, quotes were still in the process of being obtained.</p>
4.3.3.1.	The operating company shall monitor and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring.	L	Ambient air quality and dust fallout is monitored by the mine (using external consultants).
4.3.3.2.	Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results.		<p>Air quality monitoring is conducted across the operations and for the Der Brochen expansion, demonstrated in the various monitoring reports.</p> <p>The dust monitoring report for Der Brochen and Mareesburg of March 2021 identifies that there are no operational weather stations in the vicinity of Der Brochen. As the site monitoring cannot be compared to ambient conditions the 'report does not comply with the requirements of GNR 827 for a dust fall out report.'</p> <p>Development and revision of the Air Quality Management Plan for the entire site will provide a basis for what other air quality monitoring may be necessary.</p>
4.3.4.1.	New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:	—	Per guidance from IRMA, this requirement does not need to be scored during the launch phase; however, auditors are encouraged to provide information on the site's performance and practices to support ongoing development of the standard.

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	<ul style="list-style-type: none"> <li>a. If a mine is in an air shed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or</li> <li>b. If a mine is located in an air shed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards and make incremental improvements to the air quality in the air shed that are at least equivalent to the mining project's emissions.</li> </ul>		<p>The organization complies to The National Environment Management: Air Quality Act (NEM: AQA), No. 39 of 2004 that governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. In accordance with the regulations, all exceedances are required to be investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation also provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3.1 as outlined in the regulations).</p>
4.3.4.2.	<p>As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:</p> <ul style="list-style-type: none"> <li>a. New and existing mines shall comply with host country air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard.</li> <li>b. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply.</li> <li>c. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and</li> <li>d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental</li> </ul>	—	<p>Per guidance from IRMA, this requirement does not need to be scored during the launch phase; however, auditors are encouraged to provide information on the site's performance and practices to support ongoing development of the standard.</p> <p>The organization complies to The National Environment Management: Air Quality Act (NEM: AQA), No. 39 of 2004 that governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. In accordance with the regulations, all exceedances are required to be investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation also provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3.1 as outlined in the regulations).</p>

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	reductions in emissions, through a multi-year phased plan with defined timelines.		
4.3.4.3.	Dust deposition from mining-related activities shall not exceed 350 mg/m <sup>2</sup> /day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination.	—	<p>Per guidance from IRMA, this requirement does not need to be scored during the launch phase; however, auditors are encouraged to provide information on the site's performance and practices to support ongoing development of the standard.</p> <p>The organization complies to The National Environment Management: Air Quality Act (NEM: AQA), No. 39 of 2004 that governs air quality in South Africa. On 01 November 2013, the legislated standards for dust fallout were promulgated in the NEM: AQA National Dust Control Regulations. In accordance with the regulations, all exceedances are required to be investigated to establish root cause analysis. (GNR 827 of November 2013). This regulation also provides the acceptable/allowable dust fallout rates for both residential and non-residential areas (Table 3.1 as outlined in the regulations).</p>
4.3.5.1.	The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available or made available to stakeholders upon request.	⊕	<p>Air quality monitoring is conducted monthly during construction, operation, and closure. An air quality monitoring program description (methodologies, monitoring locations, map of locations, monitoring schedule) is described in the monitoring report. National Atmospheric Emission Inventory System (NAIES) reporting is done on an annual basis with the Department of Environmental Affairs. Regular air quality monitoring is reported internally and to regulatory bodies.</p> <p>The Air Quality Management Plan is not publicly available, and no such request has been made to date. However, mechanisms are in place should these requests be made to the operating mine.</p>

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<b>Chapter 4.4—Noise and Vibration</b>			
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 at existing mines if there is a proposed change to the mine plan that is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels.	L	<p>Screening is demonstrated through the noise, vibration and other specialist studies which form part of the Environmental Impact Assessment process which assesses all possible impacts prior to the mine being established and as further expansions and developments take place. Updated surveys are undertaken as the mine progresses through various levels of expansion and further development of mining areas.</p> <p>In addition, as part of the Request for Qualification process for the Air Quality Management Plan update, the appropriately qualified consultant will also be required to update existing Occupational Hygiene assessments such as noise and vibration assessments.</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.	L	<p>A study was carried out in 2019 of Environmental Noise and Vibration Impact Assessment for the Greater Tubatse and Sekhukhune Municipalities. This was to determine the prevailing ambient noise and ground vibration levels in the vicinity of the proposed der Brochen expansion project. This concluded that 'the proposed der Brochen expansion will be in line with the noise and vibration standards provided that noise migratory measures are in place and that the Environmental Management Plan for the proposed mine is adhered to'.</p> <p>Enviro-Acoustic Research was commissioned by Exigo Sustainability Ltd. to conduct an acoustical measurement report at the Lebowa and Borwa Shafts at Mototolo Complex. Acoustical measurements for this report took place from 15 to 16 January 2020. No potential noise-sensitive receptors were identified to be living within 2km from the mine.</p>
4.4.2.1.	If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00	⊕	The independent study in 2019 of Environmental Noise and Vibration Impact Assessment recommended that prevailing ambient noise level is not exceeded by 5.0 dBA (intrusion level). It also references the 'The World Bank in the Environmental Health and Safety Guidelines' that suggests for Residential area – 55.0 dBA for the daytime and 45.0 dBA for the night-time.

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	(i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are necessary and/or appropriate because of local, cultural or social norms.		<p>Following Acoustical Measurement Report undertaken in January 2020, no potential noise-sensitive receptors were identified to be living within 2 km from the mine.</p> <p>Although no potential noise receptors have been identified within 2 km of the mining activities, excessive noise levels (daytime and nighttime) were recorded at the Leshaba and Borwa shafts during the 2020 period of assessment.</p> <p>High noise levels exceeding the daytime and nighttime levels were reportedly noted during the assessment that took place in January 2020. At distances further than 2 km, noise would reportedly be attenuated and the potential impact of noise from the Lebowa Shaft would be minimal. The elevated noise levels originate from the various ventilation fans in the vicinity of the shaft complex.</p> <p>The operating company has not been able to demonstrate appropriate mechanisms in place for the alternative hours as exceedances outside of the allowable timeframe are considered to be exceptions.</p>
4.4.2.2.	<p>The following exceptions to 4.4.2.1 apply:</p> <ol style="list-style-type: none"> <li>a. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or</li> <li>b. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met.</li> </ol>	⊕	<p>Following Acoustical Measurement Report undertaken in January 2020, no potential noise-sensitive receptors were identified to be living within 2 km from the mine.</p> <p>Although, high noise levels exceeding the daytime and nighttime levels was reportedly noted during the assessment that took place in January 2020. At distances further than 2 km, noise would be attenuated and the potential impact of noise from the Lebowa Shaft would be minimal. The elevated noise levels originate from the various ventilation fans in the vicinity of the shaft complex.</p>
4.4.2.3.	If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA.	—	<p>Not relevant, as there are communities that reside near the mine.</p> <p>There are more sensitive noise receptors than commercial or industrial receptors and therefore 4.4.2.1 takes precedence."</p>

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4.4.2.4.	<p>If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows:</p> <ol style="list-style-type: none"> <li>A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period;</li> <li>Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and</li> <li>Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time.</li> </ol>	●	<p>Residential receptor areas are identified in the independent study in 1/19 of Environmental Noise and Vibration Impact Assessment. The report also states that 'ground vibration during underground blasting will be below 0.5mm/s at the abutting noise receptors' but there is no stipulation regarding air blast overpressure although international standards are referenced for this.</p> <p>The Blasting and transportation procedure does not stipulate hours for which blasting should be carried out. Currently, no monitoring / data collection (apart from the Vibro Recorder) is being undertaken, as the surface impact is reportedly minimal.</p> <p>Blasting takes place from 15:00 - 15:30 during normal working days. The latest is 15:30. For the Maresburg Tailing Storage Facility in preparation for construction, blasting took place between 17:00 - 18:00 which is considered as once off, not ongoing operational blasting.</p> <p>It is unclear, due to a lack of evidence, whether these once off occurrences are recorded to ensure these do not become a more frequent occurrence.</p>
4.4.2.5.	<p>Mines may undertake blasting outside of the time restraints in 4.4.2.4.b when the operating company can demonstrate one or more of the following:</p> <ol style="list-style-type: none"> <li>There are no nearby human noise receptors that will be impacted by blasting noise or vibration;</li> <li>Alternative hours are necessary and/or appropriate because of local, cultural or social norms; and/or</li> <li>Potentially affected human receptors have given voluntary approval for the expanded blasting hours.</li> </ol>	●	<p>As there are communities near the mining activities/areas, human noise receptors have the potential to be impacted by blasting noise or vibration. It is not clear how alternative hours are necessary or appropriate because of local, cultural, or social norms; and/or that potentially affected human receptors have given voluntary approval for the expanded blasting hours.</p> <p>There is no demonstration that alternative hours are necessary and/or appropriate for blasting because of local, cultural, or social norms; or that potentially affected human receptors have given voluntary approval for the expanded blasting hours. The Blasting and transportation procedure does not stipulate hours for which blasting should be carried out.</p> <p>Blasting (outside of normal operating times) took place from 17:00 - 18:00 during the Maresburg Tailing Storage Facility construction, whilst this was observed to be a once off example, it is unclear if similar types of occurrences occur more frequently across the complex.</p>
4.4.2.6.	<p>If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the</p>	●	<p>Noise and vibration related complaints are documented on the grievance register (managed by the social performance Team) which outlines the nature of the complaint, by which community, whether feedback was provided to the</p>


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	operating company shall consult with affected stakeholders to develop mitigation strategies or other proposed actions to resolve the complaint. Where complaints are not resolved then other options, including noise monitoring and the implementation of additional mitigation measures, shall be considered.		complainant, supporting evidence and progress made in remedying the specific grievance. Based on the grievance register reviewed, it is unclear if this is not updated timeously or if feedback is only provided if the nature of complaint is higher in severity rating. There are no criteria to determine how the severity or credibility of the complaint is determined.
4.4.2.7.	All noise- and vibration-related complaints and their outcomes shall be documented.	⊕	Noise and vibration related complaints are documented on the Grievance register (managed by the social performance Team) which outlines the nature of the complaint, by which community, whether provided to the complainant, supporting evidence and progress made in remedying the specific grievance. Based on the grievance register reviewed, it is unclear if this is not updated timeously or if feedback is only provided if the nature of complaint is higher in severity rating. There are no criteria to determine how the severity or credibility of the complaint is determined.
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.	⊕	Safety, Health, and Environment Policy has been revised to include provision of Environmental related information upon request. Noise related complaints (from Fraser Alexander which is a mining related contractor) have been raised as a grievance by the Leshaba community. This grievance was noted to be in progress in the grievance register. It is unclear if the Leshaba community was provided with feedback following their complaint as no additional evidence was available to confirm that feedback has been shared with the aggrieved community.
<b>Chapter 4.5—Greenhouse Gas Emissions</b>			
4.5.1.1.	<b>Critical</b> The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:	⊖	The Anglo American Energy and Greenhouse Gas Emissions Management Guidelines is not a policy document but the corporate Anglo Climate Change Policy, not referenced by the Mine as evidence against this clause, does meet the overall requirement and has a 3-year validity. The Policy applies to the entire


Requirement #	Requirement Text	Rating	Basis for rating
	<ul style="list-style-type: none"> <li>a. Identifying and measuring greenhouse gas emissions from the mining project;</li> <li>b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project;</li> <li>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</li> <li>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.</li> </ul>		<p>Anglo American plc group, including all its Business Units, Group Functions, and controlled subsidiaries, regardless of region or operation.</p> <p>Group target of carbon neutrality by 2040. Eight select mines globally are expected to be carbon neutral by the target date. Mototolo may or may not be one of those sites. Every operation must have projects and initiatives to reduce greenhouse gas emissions.</p> <p>Annual targets for each mine are defined by converting total energy consumption into gigajoule and emissions in tonnes CO<sub>2</sub>e. Baseline for 2016 minus a year-over-year improvement normalized against intensity.</p>
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.	L	<p>Mine's rationale refers to the corporate greenhouse gas guidelines and methodology that aligns with the greenhouse gas protocols. It was not possible to access the Scope 3 Emissions Calculation Methodology Report information.</p> <p>On-site data is captured in Enablon, and the Anglo American Platinum technical experts use that data to quantify site-by-site operational emissions broken down into significant energy sources and uses.</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 Energy and greenhouse gas emission management standard is a corporate document for consistency and reliability in greenhouse gas management and reporting.</p> <p>A mine-specific plan was under development as part of Energy Mapping. Detailed data was available but limited granularity (shaft and concentrator level for example).</p> <p>Energy Mapping project is still underway. Projects at feasibility stage to supply many South Africa mines with renewable energy. Current ideas focus on solar with hydro-storage.</p> <p>Pipeline of projects for next few years - most of which are focused on process optimization for energy efficiency but are limited to feasibility and/or planning activities, not final execution. Budget of 2.2 MM SAR is in place for feasibility studies on a wide range of project improvements.</p>

Requirement #	Requirement Text	Rating	Basis for rating
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.	⊕	<p>Energy and greenhouse gas emissions are summarized and sent to corporate entity (Operations Committee Report). Year-to-date progress is presented against targets for the Mototolo Complex and Mototolo Concentrator; both the energy and the Greenhouse Gas intensity targets are being significantly missed year to date.</p> <p>The throughput increase project, implemented in 2021 and deepening of mines caused 2021 energy intensity performance to worsen. It was anticipated that improvement projects would put the mine's energy performance back on track in 2022. However, this would be difficult to confirm until the metering is upgraded. The metering upgrade project was quite advanced but had not taken place yet at the time of assessment.</p> <p>The Mototolo Energy and Greenhouse Gas Emissions report showed that there are emissions calculations separating the two active shafts and the concentrator, but no more granularity was available.</p> <p>There was no evidence that greenhouse gas emissions had decreased or that measures designed to reduce emissions had yet been successful.</p>
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>No evidence provided at Stage 1. The Mine's rationale states that 'site Roadmaps are in draft stage and will be submitted to PMC for approval, after which they can be shared in stage 2'.</p> <p>At Stage 2 - some projects are underway but without improved metering, it is difficult to properly evaluate effectiveness.</p> <p>Overall strategies to identify more efficient mining strategies are underway, including extraction methodology and supporting infrastructure, etc. will be incorporated in De Brochen development, as well as upgrading existing operations.</p> <p>There is a pipeline of projects planned for 2022 and onward - all of which are budgeted. Monitoring upgrades are still not in place. Additionally, most projects are stating that they will "optimize" various mining processes but are essentially still feasibility studies for process improvements that may or may not eventually yield significant energy savings and do not have associated execution plans.</p> <p>Greenhouse Gas Mototolo Der Brochen Sustainable Mine Plan Final states that greenhouse gas / energy sustainability Status is: "In Process of determining the energy efficiency and carbon neutral pathways with promising opportunities under investigation."</p>

Requirement #	Requirement Text	Rating	Basis for rating
			Installed solar panels on change houses for water heating but have not been able to monitor energy usage to quantify improvements.
4.5.4.1.	The greenhouse gas policy shall be publicly available.	L	The corporate Group Climate Change Policy which applies to all Anglo American Business Units, Group Functions, and controlled subsidiaries, is publicly available.
4.5.4.2.	On an annual basis, the operating company or its corporate owner shall: <ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul>	⊕	<p>The Anglo American Platinum Environmental, Social and Governance Report 2020 gives a consolidated account of greenhouse gas emissions and performance against corporate reduction targets (net zero by 2040) and initiatives. Mototolo is not mentioned in the corporate report in relation to energy or greenhouse gas emissions. Energy and greenhouse gas emissions are summarized in the operating company's Operations Committee report and year to date progress is presented against targets for the Mine and Concentrator; both the energy and the greenhouse gas intensity targets are being significantly missed year to date.</p> <p>There is a pipeline of quick projects and medium-term projects proposed as part of the energy mapping process (in draft). This will be reviewed upon completion to identify the preferred projects or new improvement opportunities.</p> <p>Mototolo Energy and Greenhouse Gas Emissions report shows that there are emissions calculations separating the two active shafts and the concentrator, but no more granularity was available.</p> <p>Without good data at the individual mine level, it would require a lot of additional work to verify that data being reported at the Anglo American Platinum level is sound.</p>
<b>Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas</b>			
4.6.1.1.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and	L	Biodiversity assessment completed as part of the Environmental Impact Assessment process that was initiated for the mine in 2019. Biodiversity Impacts are considered during the Environmental Impact Assessment phase. All

Requirement #	Requirement Text	Rating	Basis for rating
	monitoring shall be carried out and documented by competent professionals using appropriate methodologies.		specialists involved in the Mototolo Biodiversity studies and assessments have the required qualifications and competencies.
4.6.1.2.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts.	L	Priority Ecosystems Baseline surveys were undertaken by an external specialist in 2021. Following on from this, community engagement sessions were held with the specialists from Scientific Aquatic Services.
4.6.1.3.	Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request.		Audits which contain biodiversity aspects are completed, finalized, and placed on the company's website. In addition, the stakeholders are also notified of the availability of the audit report upon request.  The updated Safety, Health, and Environment policy also includes reference to the mine providing "environmental related information" available upon request.
4.6.2.1.	<b>Critical</b> 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.	L	Mototolo is an existing mine. At the time of the site visit, Scientific Aquatic Services had been appointed to undertake a biodiversity baseline, significant biodiversity features and priority ecosystem services assessment. The draft report (dated December 2021) was under review and the mine was expected to provide comprehensive comments before finalizing.
4.6.2.2.	Screening shall include identification and documentation of: <ul style="list-style-type: none"> <li>a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas;</li> <li>b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas</li> </ul>		The Biodiversity Overlay Assessment was compiled in April 2021, no International Union for Conservation of Nature Red List of Threatened Species was identified at Mototolo. A biodiversity baseline, significant biodiversity features and priority ecosystem services assessment was in progress and with these assessments, screening of biodiversity impacts and risks would have been identified.





Requirement #	Requirement Text	Rating	Basis for rating
	<p>and the ecological processes and habitats supporting those values;</p> <p>c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and</p> <p>d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services.</p>		
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> <p>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;</p> <p>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;</p> <p>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of</p>		<p>Updated baseline, significant biodiversity features and priority ecosystem services assessments were in progress at Stage 2. With expansions underway at Mototolo some protected tree species needed to be relocated. The mine has appointed AgreenCo Environmental Projects to maintain the onsite nursery at the Der Brochen Project for a period of 12 months starting from September 2021. Visit to the Nursery managed by AgreenCo highlighted the progress being made with respect to the preservation of tree cuttings as part of tree relocation project and protection of species.</p>

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	<p>options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and</p> <p>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services.</p>		
4.6.4.1.	<p><b>Critical</b> Mitigation measures for new mines shall:</p> <p>a. Follow the mitigation hierarchy of:</p> <ul style="list-style-type: none"> <li>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;</li> <li>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;</li> <li>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and</li> <li>iv. As a last resort, offsetting the residual impacts.</li> </ul> <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>Mototolo is an existing mine. There are multiple studies and assessments that were in progress (as at Stage 2) as well as in the process of being finalized.</p> <p>Following completion of the Biodiversity Baseline Assessment, Significant Biodiversity Features, and Priority Ecosystem Services assessment, a Biodiversity Risk Assessment will be compiled.</p> <p>Following the Risk Assessment, a Loss / Gain Calculation will be done, establishment of biodiversity management plans as well as biomonitoring that is aligned to the risk assessment will be initiated.</p>

Requirement #	Requirement Text	Rating	Basis for rating
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 company shall design and implement on-site 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>	L	<p>Mototolo is an existing mine. Rehabilitation of the exploration drill sites is complete. Introduction of seedlings into rehabilitated sites will be done in phases to ensure protection of species.</p> <p>The existing Biodiversity Action Plan is dated 2011 and therefore requires update. The Significant Biodiversity Features Assessment, Priority Ecosystems Assessment will be collated to ensure one consolidated monitoring plan can be established and actions can then be tracked for completion.</p>
4.6.4.3.	Offsetting, if required, shall be done in a manner that aligns with international best practice.	●	<p>Mine representatives reported that offset requirements have not yet been determined and this will be undertaken in 2022 as part of the Net Positive Impact strategy.</p> <p>Offset requirements have not yet been determined and will only be done in 2022 following completion of the additional biodiversity studies and assessments.</p>
4.6.4.4.	<p>The operating company shall develop and implement a biodiversity management plan or equivalent that:</p> <p>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,</p>	●	<p>At the time of the site visit, the requirements outlined in a-c were outdated. Purchase Order are in place for the external specialist to complete the biodiversity baseline, significant biodiversity features and priority ecosystem services assessments.</p>

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	<p>offset adverse impacts on biodiversity and ecosystem services;</p> <p>b. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time;</p> <p>c. Provides a budget and financing plan to ensure that funding is available for effective mitigation.</p>		
4.6.4.5.	Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle.	⊕	The Biodiversity Management Program is in progress which will collate all the various studies and assessments currently taking place across the Mototolo Complex into one consolidated document.
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> <p>a. Demonstrates that the proposed development in such areas is legally permitted;</p> <p>b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;</p> <p>c. Conducts mining-related activities in a manner consistent with protected</p> <p>d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area.</p>	—	Not relevant, as mine is not located within or immediately adjacent to any Protected Areas. See the South African National Biodiversity Institute's Biodiversity GIS website.
4.6.5.2.	An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a	—	Whilst the Biodiversity Assessment Overlay report did identify approximately 1319 different species as per the IUCN Red List of Threatened Species. None of these falls under categories I - III.


Requirement #	Requirement Text	Rating	Basis for rating
	<p>reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized.</p> <ul style="list-style-type: none"> <li>• International Union for Conservation of Nature (IUCN) protected area management category IV protected areas;</li> <li>• Ramsar sites that are not IUCN protected area management categories I-III; and</li> <li>• Buffer zones of UNESCO biosphere reserves.</li> </ul>		<p>No core areas of UNESCO biosphere reserves fall within the Mototolo Complex mine area.</p> <p>Mine is not located within any IUCN Cat IV Protected Areas, RAMSAR sites, or UNESCO Buffer Zones.</p>
4.6.5.3.	<p><b>Critical</b> 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"> <li>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;</li> <li>• IUCN protected area management categories I-III;</li> <li>• Core areas of UNESCO biosphere reserves.</li> </ul>	—	<p>Mine is not located within any IUCN Cat I - IV Protected Areas, RAMSAR sites, or UNESCO Buffer Zones.</p>
4.6.5.4.	<p><b>Critical</b> An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:</p> <ol style="list-style-type: none"> <li>a. The mine was developed prior to the area's official designation;</li> <li>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</li> <li>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan.</li> </ol>	—	<p>Mine is not located within any IUCN Cat I - IV Protected Areas, RAMSAR sites, or UNESCO Buffer Zones.</p>


Requirement #	Requirement Text	Rating	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 existing Biodiversity Action Plan is outdated, and the Biodiversity Management Program (once complete) will bring together all the different studies, assessments, and monitoring requirements.
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 Environmental Impact Assessment's and existing Biodiversity Action Plan addresses mitigation measures. Several projects on site also address this, i.e., removal of protected species, building of a nursery to protect species, monitoring on Cicada species. Existing mechanisms in place to track biodiversity Net Positive Impact (NPI). However, there is a need to revise to include the revised assessments and studies.
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 status of monitoring at Mototolo complex was found to be outdated - although procurement processes had commenced to update the biodiversity baseline, Significant Biodiversity Features, and Priority Ecosystem services assessment. Existing information is outdated and does not allow for the implementation of corrective actions or consultation with stakeholders.
4.6.6.4.	The findings of monitoring programs shall be subject to independent review.		At the time of the site visit, monitoring was found to be outdated and the site commenced with updates to the various biodiversity assessments (significant Features Assessment, Priority Ecosystem Services etc.).
<b>Chapter 4.7—Cyanide Management</b>			
	Chapter Not Relevant	—	Cyanide is not used, stored, produced, or transported at Mototolo/Der Brochen Complex.


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Chapter 4.8—Mercury Management			
	Chapter Not Relevant	—	Mercury is not used, stored, produced, or transported at Mototolo/Der Brochen Complex.

# Appendix B: Corrective Action Plan


Req. #	Requirement Text	Rating	Auditors feedback	Action Plan
Chapter 1.1—Legal Compliance				
1.1.1.1	The operating company shall comply with all applicable host country laws in relation to the mining project.	●	<p>A compliance obligations procedure has been provided which outlines the processes in place and demonstrates compliance on a site level with applicable laws, regulations, permits, standards, codes, and other external requirements to which the Mototolo Complex subscribes through an effective compliance management culture and system that includes documents, records, and data control. The site makes use of the Isometrix software platform to track compliance across the entire business.</p> <p>Auditor review of this compliance management system noted examples of repeat compliance issues and overdue compliance related actions documented by the system. These suggest that the compliance management system is identifying issues but is not fully effective at managing compliance and preventing noncompliance.</p>	<p>Mototolo Mine has a permit monitoring system on Isometrix. The site will continue to maintain Legal Compliance Reports. Furthermore, the site will conduct root cause analysis on repeat findings on legal compliance and develop resulting Corrective Actions using the following process:</p> <p>a) Root Cause Analysis - Perform in-depth root cause analyses on all repeat nonconformances and incidents to identify all contributing factors</p> <p>b) Trend Analysis - Analyze trend data on types of nonconformances and incidents occurring to identify patterns</p> <p>c) Define corrective actions - Develop specific, measurable, achievable, relevant and time-bound (SMART) preventive and corrective action plans to address identified root causes and trends - Assign responsibility and completion timelines</p> <p>d) Lessons Learned Sharing - Extract and share lessons learned across the organization to raise</p>



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				<p>awareness on prevention</p> <p>e) Monitoring Effectiveness - Actively monitor the completion and effectiveness of corrective and preventive actions through performance metrics and audits</p>
Chapter 1.2—Community and Stakeholder Engagement				
1.2.2.2.	<p>The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <p>a. Providing relevant information to stakeholders in a timely manner;</p> <p>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;</p> <p>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;</p> <p>d. Soliciting feedback from stakeholders on issues relevant to them; and</p> <p>e. Providing stakeholders with feedback on how the company has taken their input into account.</p>		<p>a.) Example of Project Close out Report - NOK demonstrates how election of trustees for next of kin of Deceased Relatives were elected in great detail, COVID-19 Community Response Plan presented 13 April (first case reported 5 March), SLP engagement sessions on Recruitment and Procurement/Supply Chain Community Structures open to public, with contact for enquiries provided. each SLP project outlined in presentation.</p> <p>However, the community representative interviewed did not feel that they received transparent and timely feedback.b.) Grievance Register demonstrates where site management allocated responsibility to address grievances according to nature of grievance. Third party appointed to develop SEP, Community Perceptions Study and to establish the CEF (not established due to ongoing community disagreements).</p> <p>Interviews with community stakeholders indicated that the representatives they met with from the mine did not give feedback or do anything about their grievances.</p> <p>c.) Meetings recorded as starting with Prayer and culturally appropriate introductions. Grievance over graves in grievance register demonstrates respectful and transparent engagement process starting with an acknowledgement letter and resolved with a legal response.</p> <p>Interviews with parties affected by grave relocations,</p>	<p>Mototolo will continue to work on fostering two-way dialogue with stakeholders and some initiatives identified are:</p> <p>a) Implementation of the local accountability strategy will address two way communication between the operation and the communities</p> <p>b) The review and update of the grievance procedure to address the shortcomings found.</p>

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			<p>however, indicated that the correct procedure for relocation and compensation was not followed, and despite engagement with DBM they have not received response or resolution they find satisfactory.</p> <p>d.) Community Perceptions Project being undertaken to solicit feedback from stakeholders on number of topics. Interviews with doorstep communities indicated that they are not involved in resolving issues that affect them, and do not get sufficient feedback or opportunity to develop suitable procedures.</p> <p>e.) Presentation on SLP to community forums demonstrates how community concerns/needs are considered and incorporated into programs. Grievance register demonstrates how grievances addressed and outcomes shared with concerned stakeholders. However, a number of communities members perceived that the grievance procedure was not beneficial, and they did not receive timely and transparent feedback from the site"</p>	
Chapter 1.3—Human Rights Due Diligence				
1.3.2.1.	<p>The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.</p>		<p>Evidence provided indicates assessment of security and human right risks over a broad range (including gender-based violence, crime, contractors not adhering to government - mandated local spend and employment requirements) in the most recent Workplace Risk Assessment and Control and Layer 2 Issues-Based Risk Management (last updated 2019). Recent human rights risk identification has focused primarily on external security risks from on-going protests and road blockages. An updated Social and Human Rights Impacts and Risk Analysis based on newer group guidance (Social Way 3.0) is anticipated to be completed soon.</p>	<p>Mototolo mine will review and update the Social and Human Rights Impact analysis based on Anglo Social Way 3.0 requirements</p>


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1.3.3.3.	<p>Responding to actual human rights impacts related to the mining project:</p> <p>a. If the operating company determines that it has caused an actual human rights impact, the company shall:</p> <ul style="list-style-type: none"> <li>i. Cease or change the activity responsible for the impact; and</li> <li>ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders;</li> </ul> <p>b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;</p> <p>c. If the operating company determines that it is linked to an actual human rights impact</p>		<p>Initial Assessment: The site has conducted some human rights impact and risk analyses. The site has developed and implemented a Contractor Management Procedure and a Responsible Sourcing Standard for Suppliers. The site monitors Contractor compliance with contract terms through a human rights compliance checklist. However, on-site worker interviews indicate a consistent pattern of discrimination between full-time employees of the operating company and contractors employed at the mine through its Business Partners. Contracted workers expressed an unwillingness to lodge grievances with respect to their working conditions or environment with their Business Partner employer because of anticipated non-action. Contract workers also cited the unidentified human rights risk of an inability to freely associate.</p> <p>A Grievance Report (Jan to May 2022) provided indicates that the grievance procedure is used by workers but does not provide a means to determine if employees and contracted workers use the procedure in equal proportion.</p> <p>The follow-up assessment indicated that there are still obvious disparities between Anglo American employees and contractor workers.</p> <ul style="list-style-type: none"> <li>- Conditions of employment: Contracted workers are not permanent full-time employees of the operating company and therefore may earn a lower wage and work under lower minimum standards of employment as per legal requirements (Basic Conditions of Employment Act) and not receive the full range of benefits afforded to Anglo American employees).</li> <li>- Grievances: The culture of inequality between Anglo American employees and contractor workers remains and includes poorer access to remedies by contractors. This is due to a persistent distrust in, and lack of response from, the grievance processes. In theory contractors allow staff to raise grievances through the provided means. The reality (according to at least three interviewees), is that grievances are not taken seriously (i.e., no response or feedback is given), actively ignored and /or not reported through formal means.</li> </ul>	<p>As part of the optional Corrective Action period Mototolo mine did a Human Rights Due Diligence Study. Site will focus on implementing the Grievance Process for all contractors.</p>


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	<p>through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and</p> <p>d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships.</p>		<p>There have been steps taken to ensure due diligence is carried out in terms of the supply chain. Including:</p> <p>1) Contractor Social Management strategy aims to ensure that contractors are implementing social safeguards within their contracts and within the community.</p> <p>2) Responsible Sourcing Standard for suppliers – which aims to ensure suppliers comply with all relevant laws, industry regulations, the organization’s policies, site requirements and supply conditions.</p> <p>3) SAP Fieldglass - This is an online system that assists contractors and service providers with onboarding and tracking against the contractor’s requirements. Other initiatives</p> <p>- “Culture in Action” is another initiative being put in place. This identified Human Rights influencers, who regularly go out into the operations and engage with workers and contractors to identify any potential issues and to spread the culture of safety, equality, and fairness within the works force. This started late in 2022.</p> <p>- Living with Dignity Hub provides support to the workforce in dealing with gender-based violence (GBV), sexual harassment, bullying, victimization, harassment, and domestic violence.</p> <p>The above initiatives seem to be on the right path towards managing some of the disparities between Anglo American and contractor employees. It will, however, take a long time to change the culture of the operations, as this is a social context of South Africa.</p> <p>One of the issues identified was that contractor workers do not have the same access to the larger unions who work directly with Anglo American. As a result, contractor employees join smaller unions that are not as effective as the larger unions. The freedom of association is present; however, the effectiveness is not</p>	


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			<p>the same between Anglo American and contractor employees.</p> <p>A Human Rights Impact Assessment was conducted (Synergy, 19 May 2023). The Human Rights Impact Assessment found that there were six salient human rights impacts from the operations: two impacts are being directly caused by the operations, two impacts are being contributed to, and one is directly linked. Impacts identified in the assessment were broadly categorized into worker rights, gender-based violence, bullying, harassment and intimidation, distrust in access to remedy, impacts related to supply chain management (including unfair and unequal labor practices), and health.</p>	
Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy				
1.4.1.1.	<p>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>An appropriate grievance mechanism is in place and is accessible to internal and external stakeholders. Access is through multiple routes, namely phone call, email, post, online (Anglo anonymous hotline), SMS, WhatsApp and in-person (one-on-one or group meetings). The process is distributed in English and Sepedi and communicated at community and stakeholder meetings.</p> <p>An Incident management procedure is in place (V2 October 2019) with mechanisms to raise grievances and seek resolution. This has been communicated to stakeholders through training and publication in Sepedi and English in the Platinum Times and handed out as pamphlets. Engagement with workers and external stakeholders indicated that there was little knowledge of or easy access to the grievance procedure. The general perception was that either their grievances would not be taken seriously, or they would be targeted for raising grievances. No documentation of training of relevant personnel on the grievance mechanism. No documentation of any survey or review</p>	<p>Next steps identified are:</p> <ul style="list-style-type: none"> <li>a) The review and update of the grievance procedure to address the shortcomings found.</li> <li>b) An external context review to understand the effectiveness of the Grievance procedure.</li> </ul>

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			was carried out to evaluate the effectiveness of the grievance mechanism.	
<b>Chapter 2.5—Emergency Preparedness and Response</b>				
2.5.1.1.	All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.		<p>Evidence presented confirms that Mototolo mine has a sophisticated approach to development of emergency preparedness plans that meet many but not all the requirements of the UN Awareness and Preparedness for Emergencies at the Local Level for Mining. A plan is underway to revise any of the related plans and communicate them to relevant stakeholders to meet all Awareness and Preparedness for Emergencies at the local level requirements. Specific gaps are related to helicopter landing pad (managed by Corp aviation department) Contract with Netcare 911; and media communication - which is managed through Anglo American Platinum media relations department.</p> <p>Site Observations: On-site observations and interviews confirmed that emergency response plans were implemented at the mine. There were indications that communication to community groups could be better - although community members reportedly seemed to be more interested in other day-to-day concerns.</p>	<p>Further work will be done to revise and update emergency preparedness plan and this will include :</p> <p>a) The establishment of the EPRP committees with doorstep communities b) Stakeholder engagement plan communication for EPRP meetings.</p>
2.5.2.1.	The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.		<p>Evidence presented confirms that Mototolo Complex has scheduled emergency response workshops with doorstep communities in Quarter 2 of 2021. Awareness campaigns have already started. Update at Stage 2. Completed initial workshops with all potentially affected communities. Followed up with awareness sessions.</p> <p>Site Observations: On-site observations and interviews confirmed that various interested parties had been contacted for input as part of the development of emergency response plans. Evidence of strong community engagement was lacking but it was noted that local communities frequently failed to respond to</p>	<p>a) The establishment of the EPRP committees with doorstep communities b) Stakeholder engagement plan communication for EPRP meetings. c) Scheduled quarterly EPRP Meetings</p>

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			topics, such as this, that were not of immediate concern to them.	
<b>Chapter 2.6—Planning and Financing Reclamation and Closure</b>				
2.6.2.1	Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.		Prior to the mine being acquired by Anglo American Platinum, the required rehabilitation and closure plans were compiled and submitted in accordance with the relevant legislation at the time. These have since been revised/updated accordingly (in line with the required legislation – National Environmental Management Act Financial Provisioning Regulations). Like the closure cost liability assessment, the update of the Mine Closure Plan for Mototolo complex is underway.	We are working to finalize the closure cost liability assessment and the mine closure plan for Mototolo Complex in our efforts to prioritize the protection of human health and environment post mining end use, the next steps identified are:  a) Closure Cost Liability Completion b) Closure Plan completion c) Submission of relevant Closure Cost documents to Regulatory Bodies
<b>Chapter 3.1—Fair Labor and Terms of Work</b>				
3.1.2.1.	The operating company shall respect the rights of workers to freedom of association and collective bargaining.		Recognition and wage agreements were provided. On-site interviews with union representatives and workers confirm the operating company's respect for worker's rights to freedom of association and collective bargaining. However, interviews with contracted workers employed by Business Partners indicate unionization is discouraged.	Mototolo Mine respects the rights of workers to freedom of association and collective bargaining. The next steps identified include:  a) Create awareness on contractors employees human rights on the freedom of belonging to Unions. b) Create awareness on contractors employees to various platforms where complaints can be lodged.
3.1.3.3.	The operating company shall take measures to prevent and address harassment, intimidation, and/or		Clear evidence provided of policy and training to prevent or address discrimination, bullying and harassment, and gender-based violence has been developed and implemented.	Mototolo has since implemented a Living with dignity program to continue in our efforts to better understand the root causes of prejudice. This will be


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	exploitation, especially in regard to female workers.		Harassment focused on female workers or sexual in nature was not suggested in the conducted interviews.	coupled with continuation of culture in action work and bullying, harassment and victimization training
3.1.5.1.	<p>The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <p>a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;</p> <p>b. Shall allow for anonymous complaints to be raised and addressed;</p> <p>c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and</p> <p>d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</p>		<p>The operating company has a grievance procedure for workers in place, accessible on numerous platforms, including anonymously. On-site interviews confirm that grievances made by employees to the operating company are addressed at an appropriate level of management and in a timely manner. Workers and union representatives confirm that the grievance procedure allows workers to be represented. During interviews with workers and union representatives, there was no indication that the operating company had impeded other judicial or administrative authority. The Contractor Management Procedure is intended to place employees and contractors on a level playing field with respect to grievances related to environmental, health and safety issues. On-site interviews, however, indicates contracted workers are reluctant to lodge grievances with their business partner employers or the operating company.</p>	<p>Mototolo Mine has a grievance procedure in place and we will continue working on increasing confidence in the mechanisms in place for all workers and business partners. Further work to create awareness on contractors employees to various platforms where complaints can be lodged will be done</p>


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Chapter 3.2—Occupational Health and Safety				
3.2.4.1.	<p>The operating company shall implement measures to protect the safety and health of workers including:</p> <ul style="list-style-type: none"> <li>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;</li> <li>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;</li> <li>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;</li> <li>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;</li> <li>e. Providing adequate supervision and control on each shift; and</li> <li>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</li> </ul>		<p>Evidence provided, and site visits confirmed that the mine has implemented numerous measures to protect the safety and health of workers, including the individual requirements of this criteria. However, during the assessment some poor/unsafe conditions and execution of work tasks related to hot work were not properly controlled. This appeared to be due to lack of risk awareness. Incomplete or missing task-based risk assessments were contributing to this. The site provided several high-level risk assessment documents that included some hot work risks, but the identified task/steps/exposures did not cover the situations observed. Secondly, there was no mention of cutting/grinding or welding near flammable or combustible materials (other than rubber-lined pipes, conveyors, or empty tanks). There was no mention of using a fire watch, no mention of cutting/grinding or welding on or near mobile equipment, and no mention of expectations for cylinder valve management, pressure limitations, oxygen cleanliness, etc. In general, 'Stop, Look, Assess, and Manage' reports were being completed but not used as intended - repeating existing or common/normal controls rather than focusing on unusual hazards or changes. (Note that the 'Stop, Look, Assess, and Manage' is the only task-based risk management tool available for tasks that do not have job risk assessments.)</p> <p>May 2023: In the site's Corrective Action Plan, they stated that job risk assessments are being developed for high-risk work. Fire and hot work are related to several high-risk jobs. A consultant is appointed to update job risk assessments. Also, communication and awareness related to the use of 'Stop, Look, Assess, and Manage' and the mind jogger completion would be rolled out at operational safety, health &amp; environment meetings with supervisors.</p> <p>On-site: The site had developed and provided evidence of updated risk assessments and job risk assessments being in place, but observations and interviews showed</p>	<p>Implemented measures to be verified with verification audit.</p> <p>Protection of the health and safety of our workers is a continuous process and includes:</p> <ul style="list-style-type: none"> <li>a) Assessing and mitigating risks</li> <li>b) Updating of Governance and training documentation</li> <li>c) Capacitation of workers and emergency response teams</li> <li>d) Adequate supervision</li> <li>e) Monitoring and reporting processes in place to track our compliance with health and safety requirements</li> </ul>



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			<p>that the revised templates were not rolled out across the entire mining complex. At the time of the audit, individuals that were tasked with completing risk assessments had not yet undergone the required training. The assessor was unable to visit other areas where similar activities or risks were present and could not therefore confirm that corrective actions had been broadly applied. Feedback provided post-audit – 3 July 2023, indicated that 34 out of 35 employees have completed the hot work training. The 35th employee had left the mine and was not required to complete the training. Nov 2023 – Corrective action plan review. The site has provided evidence to demonstrate the progress of the initial corrective actions to isolate and progress corrective actions following site investigations. Further independent verification of the implemented measures of the corrective action plan will be included in the first surveillance audit.</p>	
Chapter 3.3—Community Health and Safety				
3.3.1.1.	<p>The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> <li>a. General mining operations;</li> <li>b. Operation of mine-related equipment or vehicles on public roads;</li> <li>c. Operational accidents;</li> </ul>		<p>Risks relating to sub-requirements a, b, c, f, g, and h have been scoped. Risks and impacts to community relating to d, e, and i are not identified or scoped for. The scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities did not include all the requirements; however, elements are included in other supporting documents.</p> <p>Sub-requirement e is addressed as Priority Ecosystems Baseline surveys were undertaken by an external specialist in 2021. Following on from this, community engagement sessions were held with the specialists from Scientific Aquatic Services.</p> <p>Specifically: risks related to failure of structural elements such as tailings dams, impoundments, waste rock dumps; mining-related impacts on priority</p>	<p>As part of community health and safety, Mototolo mine will review and update the Social and Human Rights Impact analysis based on Anglo Social Way 3.0 requirements</p>


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	<p>d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);</p> <p>e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);</p> <p>f. Mining-related effects on community demographics, including in-migration of mine workers and others;</p> <p>g. Mining-related impacts on availability of services;</p> <p>h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and</p> <p>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.</p>		<p>ecosystem services; and 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 because of the mining project.</p> <p>Sub-requirements d and e are included in emergency planning and biodiversity assessments.</p> <p>For sub-requirement I, the mine does have public health programs that include the risks associated with communicable diseases, so there is clearly an understanding of their extent. The communication of these risks to the respective communities have not been fully completed and further reviews will be undertaken during surveillance to assess where gaps may exist in the awareness and training programmes.</p>	
Chapter 4.1—Waste and Materials Management				
4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best	●	The Design Report for the recently designed and constructed Mareesburg Tailings Storage Facility was based on best available technologies (e.g., for Mareesburg Tailings Storage Facility liner systems applied). Additional innovations were also applied in	Tailing waste facilities at Mototolo mine have been developed using best practices. Mototolo mine will work on the following: a) Hydrocarbon Management procedure

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	available/applicable practices (BAP).		<p>the development of an impermeable layer below the liner, with low friction resistance so stability bands were applied in the basin to provide resistance to sliding. Different assessments were undertaken including 3D seepage assessments, dynamic deformation modelling, seismic assessments etc. to mitigate potential liquefaction triggered by a seismic event - Based on international best practices. Also, fiber optic cables are understood to be installed to monitor strains and leakage through the liner via temperature differences. The site has conducted a gap assessment against the Global Industry Standards on Tailing Management guidelines and has developed a timeline for the implementation of Global Industry Standards of Tailing Manager guideline improvements.</p> <p>The Design Report for the recently designed and constructed Mareesburg Tailings Storage Facility was based on the Best Available Technologies (BAT) (e.g., for Mareesburg Tailings Storage Facility liner systems were applied). Additional innovations were also applied in the development of an impermeable layer below the liner, with low friction resistance, so stability bands were applied in the basin to provide resistance to sliding. Different assessments were undertaken including 3D seepage assessments, dynamic deformation modelling, seismic assessments, etc., to mitigate potential liquefaction triggered by a seismic event. This was based on international best practices. Also, fiber optic cables are understood to be installed to monitor strains and leakage through the liner via temperature differences. The site has conducted a gap assessment against the Global Industry Standard on Tailings Management guidelines and has developed a timeline for the implementation of the Global Industry Standard on Tailing Management guideline improvements.</p> <p>Aside from tailings-related waste facilities, onsite tours of other mine waste facilities, including salvage yards, workshop areas, etc., identified practices not considered to be best available/applicable.</p>	to be amended to address the finding. b) Increased frequency of internal audit and inspections.

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			Infrastructure for the containment and collection of hydrocarbon waste is not considered best practice to prevent contamination of the surrounding environment.	
<b>Chapter 4.2—Water Management</b>				
4.2.4.1.	<p>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> <p>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);</p> <p>b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics;</p> <p>c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics;</p> <p>d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;</p>		<p>The site has established the "Mototolo Complex Water Sampling, Monitoring and Reporting Procedure v9.0." Appendix A Monitoring Locations includes locations of monitoring boreholes, water supply boreholes, surface water, dirty water dams, an oil storage facility, hydrocarbon monitoring locations, equipped boreholes, dikes, and ephemeral drainages. The monitoring and sampling program is implemented by a contractor who completes the required sampling and reporting, including quarterly reports supported by accredited lab analysis. During the on-site assessment, the site had completed and was in the process of approving the Trigger Action Response Plan (TARP) that includes the values in the IRMA Water Quality Criteria by End-Use. Formal approval and adoption of the water quality Trigger Action Response Plan (TARP) is still pending, along with evidence of the effective implementation of the Trigger Action Response Plan. The site will also be requiring lab analysis to report on sampling results against the IRMA Water Quality Criteria by End-Use.</p>	<p>a) TARP to be aligned with the new Group Water Monitoring guideline and to be reviewed by Group Legal.</p> <p>b) Annual review of the effectiveness of the identified triggers to provide early warning.</p>

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	<p>e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and</p> <p>f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables.</p>			
4.2.4.4.	<p>The operating company shall develop and implement an adaptive management plan for water that:</p> <p>a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and</p> <p>b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.</p>		<p>The 2020 Water Management Plan (WMP) outlines actions to be taken by the site on a yearly basis to mitigate water risks in the context of identified and predicted deficits underpinned by flow modelling to simulate groundwater flow/discharge volumes into the mine workings over the life of mine. The Water Management Plan does not specify adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, but does refer to applying adaptive management when required based on continuous monitoring of rainfall and evaporation and five yearly statistical analyses to track observed trends and variance in these.</p> <p>The mine has developed the "Water Adaptive Management Plan." During the Stage 2 on-site assessment in May 2022, this document was in draft and not yet approved by the site for use. Trigger response actions and adaptive management are outlined in the plan and work in conjunction with the "Anglo American Platinum 2022 Operating Framework and Recommended Implementation Measures." In addition to proposed water use license limits, trigger limits also include IRMA Water Quality Criteria. Triggers and actions are established based on green, yellow, orange, and red levels, indicating the level of severity and corresponding action required based on the severity of the trigger level. Timelines for action</p>	<p>Next steps are :</p> <p>a) Annual review of the effectiveness of the water management measures in preventing negative changes in the water characteristics.</p> <p>b) Investigation of methods or technologies to improve the effectiveness of water management measures.</p>

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			completion were not indicated in the plan document. The Water Adaptive Management Plan has been developed as of May 2023.	
<b>Chapter 4.3—Air Quality</b>				
4.3.2.1.	If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.		The mine stated that the Air Quality Management Plans for the concentrator and Tailings Storage Facility were developed. At the time of Stage 2, the Request for Qualification process had commenced to appoint an appropriate consultant to establish a complex Air Quality Management Plan The '46986-Mototolo Joint Venture Concentrator Air Quality Management Plan' (developed by an external consultant) applies to the concentrator only and is dated 2016 so may now be out of date. There is also an Air Quality Management Plan for Der Brochen Scope of Work (not rated). During the future site visit, further information can be checked including the aspects register, monitoring plan and any updated Air Quality Management Plan. The Anglo American Air Standard requires that The Air Quality Management Plan shall clearly define the site's air quality control strategy and objectives, timeframes for implementation of controls, resources available to achieve objectives, and the communication process with interested parties. The evidence provided (Air Quality Management Plan for the Concentrator) does not achieve this and it is not known if there is a separate, more detailed plan based on the Air Quality Management Plan.	We expect to update Air Quality Management plan and review the implementation progress to ensure adverse impacts on air quality are minimized
<b>Chapter 4.5—Greenhouse Gas Emissions</b>				
4.5.1.1.	The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits		The Anglo American Energy and Greenhouse Gas Emissions Management Guidelines is not a policy document but the corporate Anglo Climate Change Policy, not referenced by the Mine as evidence against	Mototolo mine is part of the Anglo-American PGMs business and we have developed comprehensive decarbonization plans such as Envusa

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	<p>the company to:</p> <p>a. Identifying and measuring greenhouse gas emissions from the mining project;</p> <p>b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project;</p> <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>this clause, does meet the overall requirement and has a 3-year validity. The Policy applies to the entire Anglo American plc group, including all its Business Units, Group Functions, and controlled subsidiaries, regardless of region or operation.</p> <p>Group target of carbon neutrality by 2040. Eight select mines globally are expected to be carbon neutral by the target date. Mototolo may or may not be one of those sites. Every operation must have projects and initiatives to reduce greenhouse gas emissions.</p> <p>Annual targets for each mine are defined by converting total energy consumption into gigajoule and emissions in tonnes CO2e. Baseline for 2016 minus a year-over-year improvement normalized against intensity.</p>	<p>Energy at a group level that are in various stages of implementation. While our targets are at a group level, the benefits will count towards site performance. In addition, focus on reduced energy consumption at a site level and initiatives to reduce GHG emissions are ongoing</p>
Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas				
4.6.4.1.	<p>Mitigation measures for new mines shall:</p> <p>a. Follow the mitigation hierarchy of:</p> <p>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;</p>		<p>Mototolo is an existing mine. There are multiple studies and assessments that were in progress (as at Stage 2) as well as in the process of being finalized.</p> <p>Following completion of the Biodiversity Baseline Assessment, Significant Biodiversity Features, and Priority Ecosystem Services assessment, a Biodiversity Risk Assessment will be compiled.</p> <p>Following the Risk Assessment, a Loss / Gain Calculation will be done, establishment of biodiversity management plans as well as biomonitoring that is aligned to the risk assessment will be initiated.</p>	<p>The focus will be on:</p> <p>a) Biodiversity Baseline, Significant Biodiversity Features and priority Ecosystem Services Assessment report completion.</p> <p>b) Impact report and Risk assessment completion.</p> <p>c) eDNA sampling completion.</p>

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	<p>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;</p> <p>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and</p> <p>iv. As a last resort, offsetting the residual impacts.</p> <p>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>			

# References

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