

Complainants: Sekuruwe Community, Mapela Executive Committee, With Support from Bench Marks Foundation

South Africa

01 November 2024

Dear Sir/Madam

**Re: Complaint of the Sekuruwe community about the IRMA audit underway in Mogalakwena, South Africa, the role of the mine and the conduct of the responsible auditors.**

We have recently complained about the audit process underway in the Anglo-American Mogalakwena mine in South Africa. Our issue of complaint was that we found out that the period of community consultation set by the auditor had lapsed without the affected communities' knowledge of a consultation process taking place. The communities, in particular Skimming and Sekuruwe, who were deliberately excluded from this process due to a lack of access to information, are at rock face of the impact of the mine's operation. The Skimming community faces resettlement and Sekuruwe is battling the tailing expansion.

When we lost hope that the problem of lacking community consultation would be addressed, an auditor by the name of [REDACTED] with the title Principal Consultant (Social Performance), got in touch with us and committed to meeting these two communities on the 30 October 2024 from 13h00.

The meetings were set up. For the meeting with the Skimming community the auditor initially went to a wrong location even though the correct meeting location had been sent. He eventually found the meeting place and the meeting at Skimming went well, which we appreciate. The second meeting with the Sekuruwe community was aborted by the auditor on the basis of a potential security threat, which we consider to be a false claim owing to the interference of the company being audited. We had clearly informed the auditor that small manageable meetings were arranged in both areas. [REDACTED] from the Bench Marks Foundation was present and had offered the Auditor to provide a ride to both of the communities. The sudden abortion of the meeting with the Sekuruwe community representatives, which had all already convened, without any further checkup on the actual situation on the ground is a big blow to the process. There was no threat existing on the ground and neither had there been any conflict in the last week.

See the WhatsApp communication which explains the meeting setup and the one which leads to the withdrawal of the auditor from the second meeting.

The Sekuruwe community met in the absence of the auditors and mandated that a formal complaint be registered immediately. See the attached roll call.



At the heart of this complaint is our worry about the integrity of this ongoing audit.

The auditor has disclosed that the Anglo-American Platinum company is providing the transport service for him. This leads us to question the independence of the audit and even of many other audits done for this company. We believe they lack credibility. In our view, the incident on the 30<sup>th</sup> of October 2025 is the reflection of the systematic manipulation by the mine to control the auditing process and silence uncomfortable community voices.

We further believe there are more general issues for IRMA and its auditing processes. In our view, IRMA needs to look into the rationale for an independent IRMA auditor to rely on the mine for their transport services and planning meetings for the community. This by itself pokes a hole in impartiality.

Fruitful discussions with the Sekuruwe community would have been possible if the offer of the Bench Marks Foundation to arrange the ride for the auditor to the community was taken up. We strongly believe that for an audit process, where true community voices are to be heard, access to communities needs to be facilitated by NGOs, like the Bench Marks Foundation, or other independent structures. A true engagement was possible here and everything was well prepared. The result of the missed engagement further together with the initial lack of access to information increases the burden on the community. It severely hampers the credibility of the audit process.

We lodge this complaint and expect a redress for practical flaws of the process.

Yours faithfully