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DATE

12th March, 2025

REFERENCE

Complaint IRMA-2024-004

Dear

Further to your complaint of 3rd September 2024 to IRMA, regarding the audit of Mogalakwena that took place 28th November – 5th December 2023, I write to update you.

As an audit & Certification Body, ERM CVS provides independent, impartial, robust audits in a variety of sustainability focused schemes. ERM CVS became involved in the IRMA scheme because we recognized great congruence in our organizations mission and values, and because we felt our audit experience and expertise could support IRMA in the implementation of their standard, focused on improving social and environmental performance across the mining industry, which we fully support.

As part of our audit process, we carry out a stakeholder identification process, with the intention of engaging with stakeholders impacted by the mining operations. Stakeholder engagement is a core element of the IRMA standard and of our audit process.

In September 2024, we received a communication from you, notifying us that certain communities had not been aware of the notification that was posted regarding our audit in 2023. At that time of your email, we were preparing to revisit the mine, to complete a verification audit in October 2024.

Because of our communications with you, in which you highlighted the Skimming community and Sekuruwe community, and because we recognized the importance of engaging with these communities, we made efforts to include community engagement meetings with the respective communities during the verification audit. Our audit team successfully met with the Skimming community representatives on 30th October 2024. Regrettably, the planned meeting with the representatives from Sekuruwe was not completed. Our auditor was advised that travel to the planned meeting location was not possible. This was due to a raised security concern and miscommunication between the audit team and the mine. Our auditor was unfortunately not able to accept your offer of alternative transport, as we were operating in accordance with our arrangements with the mine, and our own travel and health and safety policies. We are sorry this planned engagement did not happen, and we hope our swift response to your communication in September, our action to attempt to arrange meetings with the communities, and the fact that we completed other stakeholder engagement successfully at the audit, demonstrates our good intentions in this regard.

We recognize that because certain communities were not aware of our notification published prior to the 2023 audit, and were subsequently not involved in that audit, the community outreach was not as effective as we would have hoped. We have been working closely with IRMA and with their support the community outreach process has been improved, to help reach community members with limited literacy or without internet access, e.g. through use of Radio broadcasts and connecting with stakeholder groups such as The Bench Marks Foundation that maintain important relationships with communities.

In the subsequent complaint submitted by the Sekuruwe community and Mapela Executive committee, with support of the Bench Marks Foundation, the fact the mine was providing transportation for the audit team, raised the question of our auditors independence. It is normal practice in auditing, across a wide range of audit disciplines and schemes, for the client to facilitate transport of the auditors as required. In all cases, when the audit team are engaging with community members this is done privately, without the presence of mine staff, to avoid undue influence. Arranging travel, especially in areas we have not audited before, can be challenging, and the mine's support in managing our travel has always been helpful in this regard. However, we are seeking to increase the level of travel which we manage ourselves and this is something we are taking into consideration on scoping visits we conduct.

Looking ahead, having completed the Stage 2 and the follow up verification audit, the audit report for Mogalakwena will now be published.

We have sought to ensure that this report includes reference to the concerns raised in your complaint and the complaint raised by the Sekuruwe community and the Mapela executive committee. We recognize Sekuruwe community as an important stakeholder for our audit team to engage with at the next audit (due mid-2026) and intend to do so. We welcome your continued support in our engagement efforts for future audits. We will continue to strive to ensure our community outreach process is as effective as possible and collaborate with IRMA on this topic.

Thank you for contacting us, and for raising your concerns with us and IRMA. We trust that our response provides assurance that we act on feedback provided, and that we operate with integrity, professionalism and impartiality, and are committed to providing a meaningful and robust audit service, for the IRMA scheme.

Yours sincerely



Max Linnemann
Accreditation Director



Will Huggett
Associate Partner, Global Mining