Initiative for Responsible Mining Assurance

# MINE SITE RENEWAL ASSESSMENT PUBLIC SUMMARY REPORT

MINE SITE

Unki Mine

OPERATING COMPANY

Unki Mine (Private) Limited

COUNTRY OF OPERATION

Zimbabwe

3 SEPTEMBER 2026

# Acknowledgements

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

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

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# Audit Details

| | |
|---|---|
| Name of Mine: | Unki Mine |
| Operating Company: | Unki Mine (Private) Limited |
| Mine Owner: | Valterra Platinum Limited |
| Country of Operation: | Zimbabwe |
| Mined Material(s): | Platinum Group Metals, Gold, Nickel, Copper, and Cobalt |
| # Employees / contractors: | 1338 employees and 1240 contractors at the time of the audit |
| IRMA Audit Page: | https://responsiblemining.net/unki |
| Audit Type: | Renewal Audit |
| Audit Dates: | Stage 1: October 2025 – November 2025<br>Stage 2: 9 to 13 December 2025<br>Technical Review: February 2026 |
| Audit Team: | Lead Auditor (1), Social Auditors (1), Health and Safety Auditors (2), Environmental Auditors (3), Support team members (4). |
| Auditor Firm Declaration: | ✓ 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.<br>✓ The audit team members were deemed to have no conflicts of interest with the mine.<br>✓ The audit team members were professional, ethical, objective and truthful in their conduct of audit activities.<br>✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report. |
| Audit Firm: | SCS Global Services |
| Authorized Representative: | Scott Coye-Huhn, Vice-President, EBC Division |
| Representative Signature | |
| Scope of Audit | The scope includes the extraction and processing infrastructure; waste and tailings management facilities; water and wastewater systems; energy, fuel, and explosive handling systems; support and auxiliary infrastructure; and the mine site's local context.<br>There are no activities or operations specifically excluded from the Renewal Audit scope. |
| IRMA Standard Version: | IRMA Standard for Responsible Mining, v.1.0 (June 2018) |
| Achievement Decision Date: | 3 September 2026 |
| Achievement Valid Until: | 2 September 2029 |
| IRMA Reference Number: | IRMA-0076-STD1.0-02-RNW |

# 1. Mine Site Overview

## 1.1. Overview of Location

Unki Mine is situated in the northern part of Shurugwi District, within the Midlands Province of Zimbabwe, along a mineral-rich belt known as the Great Dyke, which is an igneous mafic intrusion that hosts economically important metals, including platinum group metals (PGMs) - nickel, copper, cobalt, gold, and chromite (Figure 1). The Unki Mine, an underground operation, is one of several mines in the Midlands Province. The region has a long history of mineral exploitation, with gold and chromium being mined and traded for over a century. Today, the mine is operated by Unki Mine (Private) Limited, a wholly owned subsidiary of Valterra Platinum Limited (Valterra).

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

The Unki mine's underground workings and surface infrastructure are in the Chironde Range, a rugged upland savannah woodland characterized by scattered boulders. This terrain lies at an estimated elevation of 1,400 meters above sea level and is surrounded by flat grasslands that stretch across elevations of approximately 1,100 to 1,200 meters above sea level.

Two (2) rivers border the mine concession, including the Mutevekwi (also spelt as Umtebekwa or Mutebekwe) River to the west, and the Mutevekwana (also spelt as Umtebekwana or Mutebekwana) River to the east, and are part of Runde watershed (Figure 2). Surface water, grassland, and woodland vegetation support a diverse fauna, including insects, amphibians, fish, reptiles, birds, and mammals such as baboons, kudus and bushbucks.

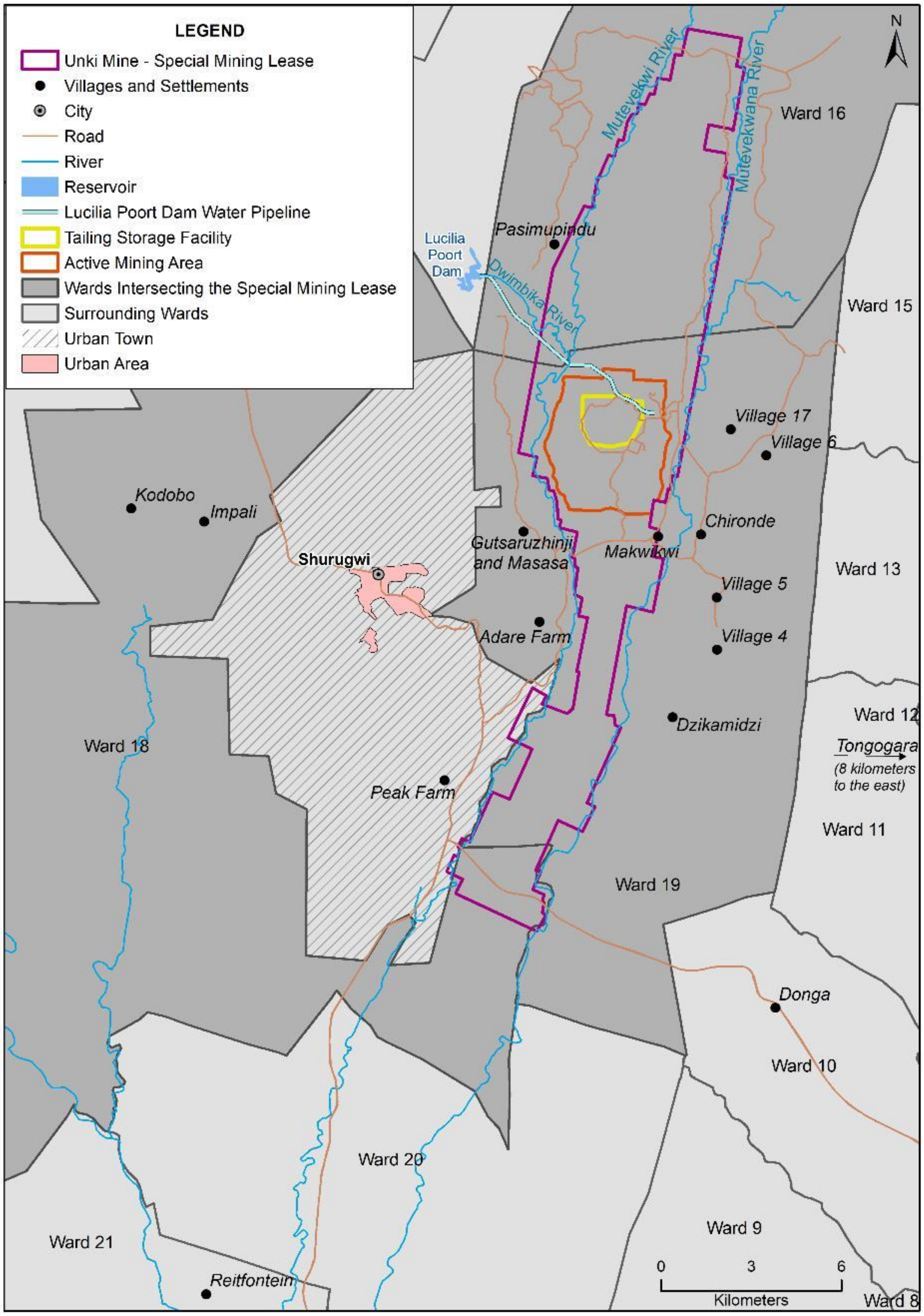



*Figure 2: Local Setting of the Unki Mine*

No protected areas have been identified in the vicinity of the mine. The Wabai Hill (Debshan Ranch) Key Biodiversity Area (KBA) is located approximately 25 km southwest of the mine.

Rural water users (e.g., Chironde, Donga, Tongogara) and livestock in the district obtain water from several sources, including groundwater (boreholes), seasonal rainwater collection, dams, and surface water (i.e., wetlands, rivers, tributaries, and springs). Urban users (e.g., Chironde, Shurugwi Town, Tongogara, Donga, Impali, and Gweru) utilize municipal water sources derived from boreholes and dams (e.g., the Gwenoro Dam on the Runde River). Water for the Unki mine operation is recycled. Top-up water is primarily sourced from the Lucilia Poort Dam on the Dwimbika River, and, when necessary, augmented by groundwater (boreholes).

The area experiences moderate temperatures (8° to 28° C) year-round with two (2) distinct seasons: summer (wet) and winter (dry). During the wet season, November to March, rainfall (est. 650-800 mm) replenishes water bodies. The dry season receives as little as 50-100 mm of rain. Zimbabwe's tropical location makes it vulnerable to shifting rainfall patterns and water resource availability. The area around the mine is prone to droughts, which have become more recurrent over the last two (2) decades due to climate change. Variability in rainfall and sporadic extreme weather events (e.g., prolonged droughts, cyclones/flooding) can significantly impact infrastructure and climate-sensitive resources in the area.

Land use around the mine is dominated by pastoral and arable fields associated with communal settlements. Domestic structures in rural areas feature basic rectangular cinderblock and brick houses, as well as some traditional-style architecture and construction—circular brick or clay structures with thatched roofs (round huts). Fuelwood is the main source of household energy in communities without electrical service. Livelihood is principally based on subsistence agriculture and animal husbandry (cattle, goats, chickens), as well as contract labour. Agricultural fields are mainly rain-fed. Household gardens are irrigated from boreholes or from valves along the Lucilia Poort Dam Pipeline. Crops include drought-resistant maize, tomatoes, potatoes, peas, cabbage, grains, legumes, sorghum, and ground nuts. In bountiful years, vegetables, meat, and milk are sold as cash crops. Years of low yields (i.e., due to low precipitation, a lack of seeds, fertilizer, or cultivation tools, or the loss of an animal) can make it difficult for households to meet minimum food requirements.

Gold panning is also practiced in streams and rivers, especially during the dry season when fields lie idle without irrigation. Artisanal and small-scale mining (ASM) for gold and chromite occurs predominantly in the greenstone belt located west of the Unki mine concession. Several industrial-scale surface mines have been opened to the west of the Unki Mine in the past three (3) years due to high gold prices.

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

An assessment of potential impacts on Indigenous, traditional, and marginalized communities was conducted for the site in September 2025. The assessment considered the Khoi and San Indigenous communities in South Africa and the Doma and Tshwa Indigenous communities in Zimbabwe. Based on the information reviewed, the assessment concluded that no Indigenous peoples were identified, whose legal or customary rights or interests may be affected by the mine's exploration or mining activities, or potential mine expansions.

Although communities surrounding the Unki Mine are not identified as Indigenous, they have traditional leaders who perform community governance functions within customary systems recognised under national legislation. The mine concession falls within communal lands overseen by Chief Banga (Wards 5–9), Chief Nhema (Wards 1, 12–15), and Chief Ndanga (Wards 10–11). Historical resettlements of certain settlements, such as Makwikwi, Village 17, and Rietfontein, in the immediate vicinity of the mine were undertaken between 1999 and 2006 in partnership with the government to enable mine development and attract investment. Additional resettlements under the national land reform program included Gutsaruzhinji, Dzikamidzi, Pasimupindu, Adare Farm, Impali, and several other villages (Figure 2).

Shurugwi town serves as the district's administrative hub, offering essential services such as healthcare (clinics), education (school), retail (stores), fuel, internet, and transportation. Nearby village, including Impali, Chironde, Donga, and Tongogara, also provide basic services. Local public infrastructure development and maintenance (i.e., water, electricity, roads) and services (i.e., clinics, schools) in the district are managed by the Shurugwi Town Council and the Tongogara Rural District Council (TRDC), in coordination with national agencies such as Zimbabwe National Water Authority (ZINWA) and the District Development Fund (DDF). Regional services, such as hospitals and air travel, are available in neighbouring provinces in the cities of Gweru and Bulawayo.

Unki Mine is one of the largest employers in Shurugwi District, sourcing most of its entry-level and operational workforce, along with that of its business partners, from local communities. The mine contributes to regional development through Social and Economic Development programs and the Tongogara Community Share Ownership Trust (TCSOT), a government initiative aimed at reducing rural poverty. Through TCSOT, investments have supported the construction of clinics, schools, boreholes, and other essential infrastructure.

English serves as the primary language for government, business, and education, while Shona, followed by Ndebele, are the most widely spoken local languages.

## 1.2. Overview of Operation

Global demand for platinum group metals (PGMs) is largely driven by their use in the automotive industry for catalytic converters, fuel cell technology for energy storage, and as a precious metal. Unki is one of several industrial-scale mines currently operating within the Great Dyke, whose principal product is PGM. The mine is operated by Unki Mines (Private) Limited, which is wholly owned by Valterra Platinum Limited (Valterra Platinum) since June 2025 (previously owned by Anglo American Platinum Limited [Anglo American]).

The construction of surface infrastructure began in 2005, with the Lucilia Poort Dam and the main access road. The Unki mine opened in 2008. The underground portal and decline shaft were excavated on the eastern side of the Chironde Range in 2008, from which ore was temporarily stockpiled on the surface. The concentrator was commissioned in 2010 and reached its nameplate milling capacity of 120,000 tons per month (ktpm) in 2011. Since then, production has expanded to about 210 ktpm. A smelter was added to the process in 2018 to produce matte from the concentrate generated by the concentrator. The matte is then shipped to Valterra

Platinum's refineries in Rustenburg, South Africa, for further processing. At current production levels, the life-of-mine is until 2045.

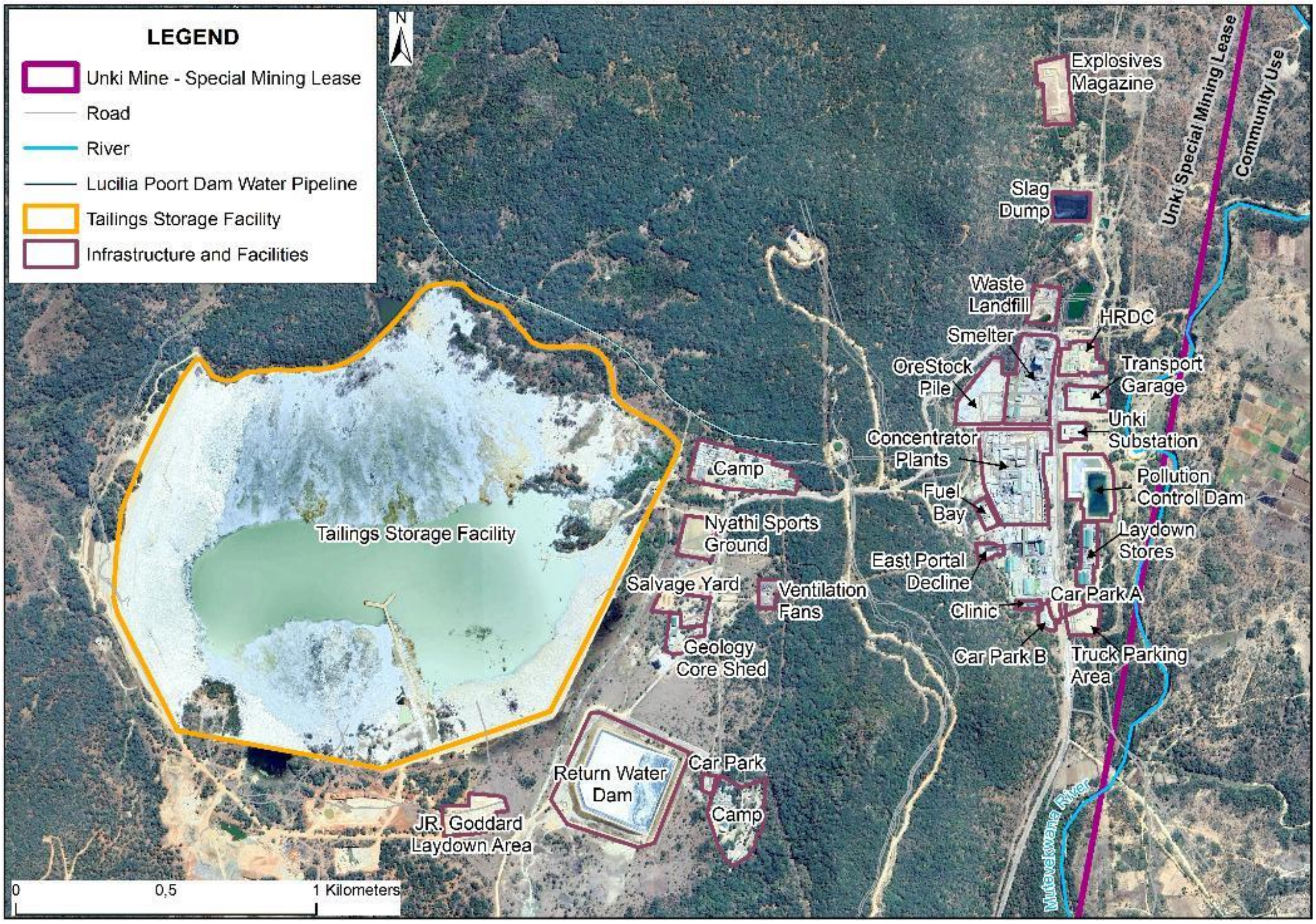


*Figure 3: Generalized view of the Unki Mine Surface Operations*

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

The workforce consists of 2,578 full-time workers, of which 51% are direct workers and 49% are contractors (Stage 1 Opening Meeting, October 2025). About 11% of the workforce is female (IRMA Mine Application, June 2024).

### 1.2.1. Scope of Activities and Facilities included in the Audit

The scope of this IRMA Renewal Audit covers the physical areas within Valterra Platinum's Unki Mine concession and related facilities, including: underground mine, including decline, tunnels, roof and pillars, conveyor belts and ventilation shafts; concentrator, including milling and flotation processing facilities; smelter; conveyor systems; ore stockpiles; Tailings Storage Facility (TSF); waste rock disposal area; slag storage facility; non-mine waste management facilities (landfill, biodigester, incinerator, waste sorting facilities, etc.); Return Water Dam (RWD); Pollution Control Dam (PCD); Lucilia Poort Dam (LPD) and water pipeline; wellfields; water supply system; water treatment plant; wastewater treatment plants; groundwater extraction wells; seepage collection systems; artificial wetland below the PCD; stormwater and sediment management channels and dikes; transmission lines, substation and distribution lines; backup generators; solar power facility project site, fuel handling and storage areas; explosives magazine; vehicle and equipment maintenance facilities; operations buildings and control rooms; monitoring stations (water, air quality, biodiversity, communities, etc.)

There are no activities or operations specifically excluded from the Renewal audit scope.

IRMA Chapters determined by the mine site to be not relevant at the time of its self-assessment and confirmed by auditors as part of their assurance process are listed below.

- **Chapter 2.2: Free, Prior and Informed Consent (FPIC)** - There is no indication that there are Indigenous or traditional people whose legal or customary rights or interests may be affected by their exploration or mining activities, or potential mine expansions.
- **Chapter 2.4: Resettlement** - The Unki Mine has been in operation since 2008. Past resettlements occurred in 2001, 2003, and 2006, with no resettlement or economic displacement reported since April 2006. There are also no indications of any plans that could result in future involuntary resettlement.
- **Chapter 3.4: Mining in Conflict-Affected or High-Risk Areas** – The site is not located in a conflict-affected or high-risk area and does not have product that is transported through conflict-affected or high-risk areas. In addition, the company does not procure minerals from external sources located outside the project site.
- **Chapter 4.7: Cyanide Management** - The site is not associated with the production, storage, use or transportation of cyanide; and does not require the storage onsite of cyanide in bags or bulk containers, or that use cyanide in a mill process.
- **Chapter 4.8: Mercury Management** - The site does not utilize an autoclave, roaster, carbon kiln, refining furnace, retort or other process that could lead to significant emissions of mercury.

### 1.2.2. Limitations of the Audit

No limitations were identified during the audit. All areas required for assessment were accessible to the audit team, and all necessary documentation and stakeholder interviews were provided without restriction. No safety risks or other constraints impeded the ability to evaluate compliance with the audit criteria.

### 1.2.3. Summary of Material Operational or Administrative Changes at Site Since the Previous Audit

Since the last audit, the mine has undergone both administrative and operational changes. Administratively, prior to May 2025, the operating company in Zimbabwe, Unki Mines (Private) Limited ("Unki Mines"), was owned by Anglo American Platinum. In June 2025, following the demerger and rebranding of Anglo American Platinum, which was a part of the UK-based Anglo American plc, Unki Mines became wholly owned by Valterra Platinum Limited ("Valterra Platinum"), a South African-based company. In terms of government permitting, no changes were necessary due to the demerger, as all permits are issued to Unki Mines, a private company registered in Zimbabwe. Valterra Platinum continues to use corporate-level policies developed under Anglo American ownership until they are formally replaced by Valterra-issued policies.

Operationally, the most significant changes since the previous audit include the commencement of a phased construction of a 35MW Solar Photovoltaic facility south of the TSF and a surface bulk sampling project. The bulk sampling project, conducted in 2023 at the southern tip of the Unki Mine special mining lease, aimed to assess the feasibility of an open pit. Interviews with company management confirmed that no decision regarding this open pit prospect has been made to date.

# 2. Mine Site Renewal Assessment Process

## 2.1. Overview of IRMA Process

The Unki mine was initially audited between September and December 2019. The initial audit report was published on the IRMA website (https://responsiblemining.net/unki) and received an achievement level of IRMA 75 on February 18, 2021 (Achievement Certificate # IRMA-STD-SCS-002-C-00001).

A surveillance verification audit was conducted between May 2022 and February 2023 to evaluate continued performance measured in the initial audit. The verification audit was published on the IRMA website (https://responsiblemining.net/unki) on February 16, 2024, and maintained the achievement level of IRMA 75, that was awarded following the initial audit.

Achievement levels, which are awarded following an IRMA audit, are valid for a period of three (3) years from the date the audit report is finalized. . A surveillance verification audit is required mid-cycle (18 months). The renewal assessment must be completed and a new audit report published within three (3) years of the achievement level being issued.to maintain or improve the achievement level.

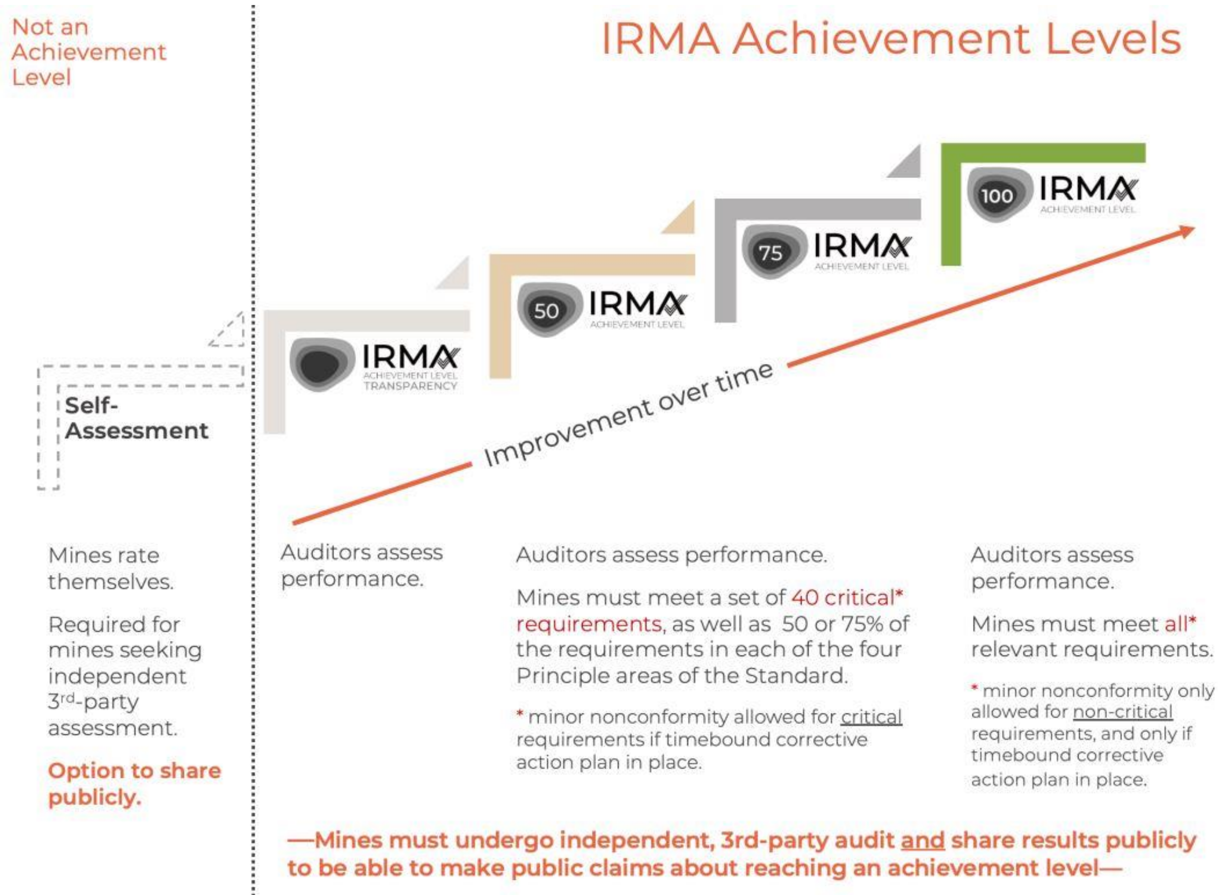
The mine site renewal assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).[1] When the self-assessment has been completed, the independent, third-party assessment may begin.

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

Stage 2 is the on-site visit, which includes facility and site-based observations, additional review of materials, 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 Certification Body determines a mine site's achievement level.

IRMA recognizes four (4) levels of achievement. For a complete description of the renewal assessment process and achievement levels, see IRMA's Certification Body Requirements, available on IRMA's website.[2]




## 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.[3]

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).[4] In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

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

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

### 2.1.2. IRMA Complaints Process

If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the IRMA website.[5] Details on the complaints process can be found in IRMA's Issues Resolution Procedure.[6]

## 2.2. Audit Process and Timeline

- The Initial Audit for the Unki mine was published in February 2021.
- The Surveillance Audit was published in February 2024.
- The Unki Mine completed the initial self-assessment for this Renewal Audit in October 2025.
- SCS Global Services carried out an initial Stage 1 desktop audit from October to November 2025.
- SCS Global Services conducted a Stage 2 on-site audit from 9 to 13 December 2025.
- A draft audit report was provided to the Unki Mine and IRMA for evaluation of errors of fact in March 2026.
- The final report was published on 3 September 2026

The on-site renewal audit included a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs), governmental agencies, documentation review and visit to operational areas listed in 2.4. Communities and nearby towns were also visited, including: Tongorara, Chironde, Dzikamidzi, Makwikwi, Village 17, Pasimupindu, Masasa, Gutsaruzhinji, Shurugwi, and Gweru.

## 2.3. Stakeholder Engagement

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

### 2.3.1. Written comments/inquiries

The audit was announced on November 7, 2025, on the IRMA and SCS webpages. At the same time, the company posted the audit announcements in various public locations in communities and at the mine. In addition, the following channels for stakeholder comments and inquiries were provided: online contact form, email, and a dedicated WhatsApp number. The comment period for this report ended on December 19, 2025.

Direct outreach to stakeholders prior to the on-site audit included email invitations for comment sent to five (5) NGOs and two (2) trade unions. Of these, one (1) NGO and one (1) trade union responded, and a virtual meeting was held before the on-site audit. No further requests for in-person or virtual meetings were received before or during the site visit.

A total of eight (8) written comments were received from two (2) stakeholders following the on-site audit, which are recorded in a communication log.

### 2.3.2. Mine Staff

The following individuals were interviewed as subject-matter experts on one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

| **Position/Role** | |
|---|---|
| Assistant Engineer | Project Manager |
| Civil Engineering – Mineral Residue Facilities & Water | Protection Services Manager |
| Commercial Manager | SED Officer |
| Company Secretary | SHE Administrator |
| Cultural Heritage Principal | SHE Manager |
| Cultural Heritage Specialist | Safety Advisor |
| Engineering Manager | Section Engineer - Concentrator |
| Environmental Coordinator | Section Manager Employee Relations & Welfare |
| Environmental Officer | Senior Accountant |
| People and Organisation Manager Operations | Senior Financial Reporting Manager |
| Mining Manager | Senior Manager Employee Relations & Wellness |
| Occupational Health & Wellness Advisor | Senior Plant Metallurgist |
| Occupational Hygienist | Social Performance Manager |
| Operational Risk Advisor | Social Performance Officer |
| Operational Risk Officer | Specialist Reporting Projects & Energy |
| Permitting Coordinator | Stakeholder Engagement and Communities |
| Principal Environmental Biodiversity & Rehabilitation | Technical Mining Manager |
| Principal Mineral Residue | Wellness Officer |
| Principal Renewable Energy Projects | Work Study Clerk |
| Process Manager | Assistant Engineer |
| Professional Nurse Team Lead | |

### 2.3.3. Workers/Contractors

On-site interviews were conducted from December 09, 2025, to December 13, 2025, with both permanent and contract employees. The interviews included 55 workers and contractors, conducted in one-on-one and small-group settings. Of the 55 interviewees, 28 were employees (6 females, 22 males) and 27 were contractors (12 females, 15 males). The participants represented a diverse cross-section of workers, varying in roles, gender, age, years of service, and type of work responsibilities across the key operational areas of the mining operation. Members of the site's Workers' Committee, a formal employee representative body established under labour legislation to represent workers' interests in workplace matters, were also included.

The interviewees represented multiple departments and were selected to ensure diversity in age, gender, experience, work groups, shifts, and responsibilities, including operational, administrative, worker health and safety, and security. Topics discussed included working conditions, with a focus on women and vulnerable groups, grievance mechanisms, freedom of association, health and safety, and more.

Interviews were held at various onsite locations, including administration offices, underground workings, surface operations, industrial plants, the concentrator and smelter, the tailings storage facility, security posts, workshops, the waste incinerator, cafeteria, worker camps, change house, and the training room, ensuring both safety and worker privacy. Importantly, worker interviews were conducted without company management present. Supervisory staff were interviewed individually but did not participate in group sessions with workers to avoid influencing employee responses.

| **Meeting Type** | **Total Number of Attendees** |
|---|---|
| Group interview, workers | Group A: 2 (2 males)<br>Group B: 4 (1 female, 3 males)<br>Group C: 3 (3 males)<br>Group D: 3 (3 males)<br>Group E: 2 (2 males)<br>Group F: 2 (2 males)<br>Group G: 2 (1 female, 1 male) |
| Group interview, contractors | Group H: 3 (3 males)<br>Group I: 2 (2 males)<br>Group J: 2 (2 males)<br>Group K: 2 (2 males)<br>Group L: 2 (1 female, 1 male)<br>Group M: 5 (5 females)<br>Group N: 3 (3 females)<br>Group O: 3 (1 female, 1 male)<br>Group P: 2 (2 males) |
| Individual interview, worker | 9 (4 females, 5 males) |
| Individual interview, contractor | 4 (2 females, 2 males) |
| Total | 18 females, 37 males |

## 2.3.4. Government Agencies

In-person interviews were conducted between December 09, 2025, to December 13, 2025, during the on-site audit.

| Government Institution | Location | Total Number of Attendees |
|---|---|---|
| Tongogara Rural District Council | Tongogara | 1 male |
| Ministry of Mines | Gweru | 1 male |
| Environmental Management Agency | Shurugwi | 2 males |
| Ministry of Labour | Gweru | 1 female |
| Ministry of Women Affairs and Small and Medium Enterprises Development | Shurugwi | 1 male |
| Shurugwi District | Shurugwi | 1 male |
| Forestry Commission Shurugwi | Shurugwi | 1 female |
| Chironde Health Center | Chironde | 1 female |
| Total | | 3 females, 6 males |

### 2.3.5. Participating Communities and NGOs

Interviews were conducted with external community stakeholders in November and December 2025, including two (2) online meetings. The community interviews involved a total of 152 interviewees, consisting of at least 59 males, 63 females, and 3 children; and included a cross-section of members, including men, women, the elderly, and vulnerable groups where possible; and key community leaders, civil society organizations, and other stakeholders.

To ensure confidentiality, interviewees were informed of the measures in place to protect their identities and comments. All interview data was anonymized, and access to the information was restricted to the audit team, ensuring that no personal or sensitive details could be traced back to specific individuals.

| Community, NGO Name | Location | Total # of Attendees |
|---|---|---|
| Chironde | Chironde | 13 (11 females, 2 males) |
| Dzikamidzi | Dzikamidzi | 30 (gender not counted) |
| Gutsaruzhinji | Gutsaruzhinji | 17 (4 females, 13 males) |
| Makwikwi Community Representatives | Makwiki | 5 (1 females, 4 males) |
| Makwikwi | Makwiki | 30 (13 females, 17 males, 3 children) |
| Pasimupindu | Pasimupindu | 16 (8 females, 8 males) |
| Village 17 | Village 17 | 22 (17 females, 5 males) |
| Masasa | Masasa | 14 (5 females, 9 males) |
| Zimbabwe Environmental Law Association (ZELA) | online | 2 females |
| Zimbabwe Diamond & Allied Minerals Workers Union (ZDAMWU) | online | 3 (2 females, 1 male) |
| Total | 9 communities/ organizations | 63 females, 59 males, 30 uncounted, 3 children |

## 2.4. Summary of Mine Facilities Visited

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

| | |
|---|---|
| **Operational areas** | Underground mine, including decline, tunnels, roof and pillars, conveyor belts and ventilation shafts; concentrator, including milling and flotation processing facilities<br>Ore stockpiles, conveyor systems, smelter<br>Tailings Storage Facility (TSF), waste rock disposal area, slag storage facility<br>Non-mine waste management facilities (landfill, biodigester, incinerator, recycling facilities, etc.)<br>Return Water Dam (RWD), Pollution Control Dam (PCD); water supply system; water treatment plant; wastewater treatment plants; seepage collection systems; stormwater and sediment management channels and dikes<br>Power transmission lines, substation and distribution lines; backup generators<br>Fuel handling and storage areas, explosives magazine; vehicle and equipment maintenance facilities<br>Operations buildings and control rooms |
| **Other areas visited** | Solar power facility project site, wellfields, Lucilia Poort Dam (LPD) and water pipeline<br>Dwimbika Stream and Umtebekwi Stream<br>Artificial wetland below the PCD, wetlands, rehabilitation areas, cultural heritage sites, other notable biodiversity sites<br>Monitoring stations (water, air quality, biodiversity, communities, etc.). |
| **Surrounding Communities** | Tongogara, Chironde, Dzikamidzi, Makwikwi, Village 17, Pasimupindu, Masasa, Gutsaruzhinji, Shurugwi, and Gweru |

# 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 maintained the level of IRMA 75, which was initially issued following the Initial audit and was confirmed during the Renewal audit, 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

| | Chapter Relevant* | Actual Score | Possible Score | Percent Score |
|---|---|---|---|---|
| Principle 1: Business Integrity | | 103 | 110 | 94% |
| Chapter 1.1—Legal Compliance | Yes | 13.5 | 14 | 96% |
| Chapter 1.2—Community and Stakeholder Engagement | Yes | 26.5 | 28 | 95% |
| Chapter 1.3—Human Rights Due Diligence | Yes | 21 | 22 | 95% |
| Chapter 1.4—Complaints Mechanism/Access to Remedy | Yes | 20 | 22 | 91% |
| Chapter 1.5—Revenue and Payments Transparency | Yes | 22 | 24 | 92% |
| Principle 2: Planning for Positive Legacies | | 76 | 96 | 79% |
| Chapter 2.1—Env/Soc Impact Assessment and Management | Yes | 28 | 32 | 88% |
| Chapter 2.2—Free, Prior and Informed Consent | No | Not relevant | Not relevant | Not relevant |
| Chapter 2.3—Community Support and Benefits | Yes | 14 | 16 | 88% |
| Chapter 2.4—Resettlement | No | Not relevant | Not relevant | Not relevant |
| Chapter 2.5—Emergency Preparedness and Response | Yes | 12 | 12 | 100% |
| Chapter 2.6—Planning/Financing Reclamation & Closure | Yes | 22 | 36 | 61% |
| Principle 3: Social Responsibility | | 175 | 192 | 91% |
| Chapter 3.1—Fair Labour and Terms of Work | Yes | 48.5 | 56 | 87% |
| Chapter 3.2—Occupational Health and Safety | Yes | 39 | 46 | 85% |
| Chapter 3.3—Community Health and Safety | Yes | 17 | 18 | 94% |

| | | | | |
|---|---|---|---|---|
| Chapter 3.4—Conflict-Affected and High-Risk Areas | Yes | 4 | 4 | 100% |
| Chapter 3.5—Security Arrangements | Yes | 36 | 36 | 100% |
| Chapter 3.6—Artisanal and Small-Scale Mining | Yes | 8 | 8 | 100% |
| Chapter 3.7—Cultural Heritage | Yes | 22.5 | 24 | 94% |
| **Principle 4: Environmental Responsibility** | | **145.5** | **168** | **87%** |
| Chapter 4.1—Waste and Materials Management | Yes | 51.5 | 56 | 92% |
| Chapter 4.2—Water Management | Yes | 32 | 38 | 84% |
| Chapter 4.3—Air Quality | Yes | 16.5 | 18 | 92% |
| Chapter 4.4—Noise and Vibration | Yes | 12.5 | 16 | 78% |
| Chapter 4.5—Greenhouse Gas Emissions | Yes | 14 | 14 | 100% |
| Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas | Yes | 19 | 26 | 73% |
| Chapter 4.7—Cyanide Management | No | Not relevant | Not relevant | Not relevant |
| Chapter 4.8—Mercury Management | No | Not relevant | Not relevant | Not relevant |

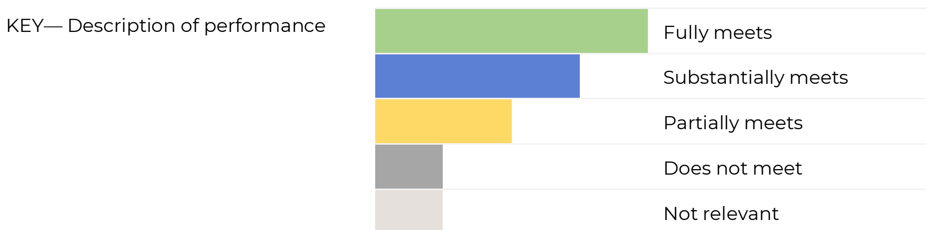
* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials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

Chapters deemed Not Relevant do not factor into the Principle Scores.

# 3.3. Performance on critical requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve 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. | ● |
| 1.2.2.2. | The mine fosters two-way dialogue and meaningful engagement with stakeholders | ● |
| 1.3.1.1. | The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights. | ● |
| 1.3.2.1. | and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships. | ● |
| 1.3.3.3. | The operating company is taking steps to remediate any known impacts on human rights caused by the mine. | — |
| 1.4.1.1. | Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation. | ● |
| 1.5.5.1. | The operating company has developed, documented and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors. | ● |

### Principle 2: Planning for Positive Legacies

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

| | | |
|---|---|---|
| 2.6.4.1. | Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring). | — |

## Principle 3: Social Responsibility

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

## Principle 4: Environmental Responsibility

| | | |
|---|---|---|
| 4.1.4.1. | A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities. | ◕ |
| 4.1.5.1. | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices. | ● |
| 4.1.5.6. | The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities. | ● |
| 4.1.8.1. | The mine does not use riverine, submarine or lake disposal for mine wastes. | ● |
| 4.2.4.1.a-e | Water quality and quantity are being monitored at the mine site | ◕ |
| 4.2.4.4 | and adverse impacts resulting from the mining operation are being mitigated. | ◕ |
| 4.3.2.1. | When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan. | ● |
| 4.5.1.1. | There is a policy being implemented that includes targets for reducing greenhouse gas emissions. | ● |
| 4.6.2.1. | The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas | ◕ |

| | | |
|---|---|---|
| 4.6.4.1. | and these impacts are being mitigated and minimized. | — |
| 4.6.5.3. | 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 | — |
| 4.6.5.4. | and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized. | — |
| 4.7.1.1. | Gold or silver mines using cyanide are certified as complying with the Cyanide Code. | — |
| 4.8.2.3. | Mercury wastes are not permanently stored on site without adequate safeguards, | — |
| 4.8.2.2. | are not sold or given to artisanal or small-scale miners and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories. | — |

# 4. Next Steps

## 4.1 Corrective Action Plans

In the IRMA system, all critical requirements that are not fully met must be included in a corrective action plan that identifies the site's intended measures for resolving gaps. Progress against this plan will be assessed during the next audit. This plan is provided as Appendix B.

## 4.2 Disclosure of Audit Report

IRMA requires that all mines that undergo independent, third-party auditing disclose an audit report to maintain good standing in the IRMA system. Unki Mine's public audit report will be posted on the IRMA web site.[7] Stakeholders may request a copy of the report from the mine in accordance with 1.2.4.1.

## 4.3 Considerations for Future Audits

Since the previous audit, a key development has been the demerger of the operation from Anglo American and transition of ownership to Valterra Platinum, with updates to policies and procedures under way at the time of this renewal audit. The revision of policies and procedures, as well as continued implementation under the new organizational structure, need to be verified during the surveillance audit. Potential effects of this transition on ongoing community support activities will also be reevaluated to ensure the continuity and effectiveness of community programs.

With respect to workers' rights and safety, continued attention is required to ensure unimpeded access to grievance mechanisms without fear of retaliation, as well as consistent provision and use of personal protective equipment (PPE). In addition, identified gaps in contractor alignment with applicable labour and social security laws and regulations, specifically in relation to the use of short-term contracts, working hours, and remuneration, should be reassessed during the next audit.

Updates related to artisanal and small-scale mining (ASM), particularly where activities may occur under concession agreements that are still in the development phase, should also be reviewed to assess alignment with applicable requirements.

In terms of environmental management, decisions regarding the long-term management of slag disposal and storage methods represent a priority area for further assessment, alongside water management practices. Ongoing drought conditions may heighten concerns around water security at both the site and community level, while monitoring of potential impacts from occasional discharges from the Return Water Dam and within the Dwimbika Stream will be key areas of focus in the next surveillance audit. Additionally, future audits should review the implementation and effectiveness of the biodiversity monitoring program, the mitigation hierarchy, and any additional biodiversity offset programs.

The next surveillance audit is expected to be completed within 12 – 18 months after the publication of this audit report.

A detailed list of abbreviations is provided as Appendix C and footnotes are provided as Appendix D.

# APPENDIX A – Results by Requirement

KEY — Description of performance

| | |
|---|---|
| ● | Fully meets |
| ◕ | Substantially meets |
| ◑ | Partially meets |
| ⊗ | Does not meet |
| — | Not relevant / not scored |

# Principle 1: Business Integrity

## Chapter 1.1—Legal Compliance

| | |
|---|---|
| Chapter Relevant? | Yes |
| Overall Chapter Score | 96% |
| Chapter Score Basis | 13.5 out of 14 possible points |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| 1.1.1.1. | Critical. The operating company shall comply with all applicable host country laws in relation to the mining project. | ● | The evidence reviewed includes the Integrated Permitting Standard Version 1.0 (Valterra Platinum, June 2025) outlining the minimum mandatory requirements to effectively mitigate permitting risks, integrate permitting into existing business processes, and provides guidance on the use of a system for managing permitting data.<br><br>The company has developed a centralized tool for tracking the status of all compliance obligations, as documented in:<br><br>- Unki Permits Isometrix Register (October 2025): A centralised digital register the company uses to track permits across the Unki Complex. Each permit is linked to relevant host country legislation including recent updated legislation, confirming that the company updates and monitors its compliance obligations in alignment with Zimbabwe's latest relevant laws.<br><br>- Isometrix Compliance Monitoring Process (no date): A structured workflow used to assess each permit against its respective conditions and commitments. The process includes steps for identifying applicable legislation, assigning permit ownership, tracking compliance status and, escalating unresolved non- |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | compliances, indicating that the company has a formalised and systematic approach to monitoring compliance obligations through the Isometrix platform.<br><br>- Unki Complex Permits Isometrix Dashboard (no date): A visual overview of the company's permit management, which enables monitoring of permit status, ownership, compliance, and lifecycle through an integrated interface.<br><br>The company monitors, on a monthly basis, its operations against all permit conditions as demonstrated by the Unki Mine Monthly Compliance Report (Valterra Platinum, July 2025), which indicates that all permit conditions reviewed during the reporting period were compliant, with no non-compliances observed or outstanding permit issues being tracked for closure. Additional support is provided by a sample of government Inspection Reports (Environmental Management Agency, October 2025; Ministry of Labour, March and October 2025), which document compliance with applicable regulatory requirements.<br><br>Interviews with relevant company staff indicate that procedures are in place for the ongoing tracking of host-country legal requirements and for monitoring compliance with those obligations. Staff noted that existing permits issued to Unki Mine (Pvt) Ltd remain valid following the transition in ownership from Anglo American to Valterra Platinum. Interviews with a sample of government authorities responsible for issuing operational permits and conducting regulatory inspections at the mine site indicate that the company is viewed as operating in good standing and meeting applicable legal requirements. |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | The evidence, supported by interviews, indicates that the company complies with all applicable host-country laws regarding the Unki mine and its associated facilities. |
| 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. | — | Not relevant. Evidence reviewed during the audit, as well as interviews with relevant staff, indicate that there are no Zimbabwean requirements that conflict with IRMA requirements. |
| 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. | ● | The evidence reviewed includes the Non-Conformity and Corrective Action Procedure (Anglo American, 2022), which establishes processes for identifying and managing legal non-compliances, including investigation, corrective action, and tracking to closure in the Isometrix system. Supporting evidence reviewed includes a sample report from the Isometrix Permits Register (October 7, 2025), which demonstrates the use of the Isometrix IT tool to manage and follow up on the company's permitting obligations and associated actions. An example of an internally identified legal non-compliance related to blasting time restrictions, including documentation of the corrective actions implemented and subsequent follow-up, was also reviewed (Anglo American, 2024). |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | Interviews with site personnel indicated that regulatory inspections occur regularly and that identified compliance issues are addressed through the established procedure. Interviews with a sample of government authorities responsible for issuing operational permits and conducting regulatory inspections at the mine site indicate that the company is viewed as operating in good standing and meeting applicable legal requirements.<br><br>The evidence, supported by interviews, indicates that when legal non-compliances have been identified, the company has taken corrective actions and recorded follow-up measures to address the issue and reduce the likelihood of recurrence. |
| 1.1.4.1. | The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project. | ◕ | The evidence reviewed includes the Responsible Sourcing Standards for Suppliers (Valterra Platinum, June 2025), which support ethical decision-making when selecting and working with suppliers and detail requirements related to health and safety, environmental protection, labour and human rights, community contribution, and business integrity. A Group Contractor Performance Management Procedure (Anglo American, January 2023) defines the contractor performance management process, while the Contractor Social Management (CSM) Audit Protocol (Anglo American, no date) and the 2024 CSM Assessment Report (Anglo American, no date) document the company's evaluation of contractors against internally defined criteria generally aligned with IRMA requirements. The contractor obligations defined in the CSM Audit Protocol include implementing worker grievance mechanisms, participating in site grievance processes, communicating labour rights, overseeing subcontractors, following the Chance-Find Procedure, completing site induction and social |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | performance training, engaging in road safety and community initiatives, and appointing personnel responsible for social performance.<br><br>Supporting evidence includes a sample contractor agreement (2021), which outlines contractor obligations for compliance with legal and corporate requirements and grants the company oversight authority. Additional evidence includes a corrective action plan arising from a CSM audit conducted in 2024 and a summary matrix documenting the results of a CSM audit of a transportation contractor (Anglo American, 2024).<br><br>Interviews and document review with a sample of contractors indicated that some relevant social requirements were not in compliance with the IRMA standard and had not been tracked by the company.<br><br>The evidence indicates that the company has established policies, contractual provisions, and procedures for communicating and monitoring social and environmental performance expectations with its contractors.<br><br>The evidence, supported by interviews, does not indicate that the company consistently identifies, tracks, and ensures timely corrective action for contractor non-compliances with requirements relevant to the IRMA Standard. |
| 1.1.5.1. | The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance | ● | The evidence reviewed includes the Permitting Management and Compliance Procedure (Anglo American, 2022), which sets out the process for timely obtaining and maintaining permits required for mine site operations and projects, and indicates that all permitting processes must be managed in the permitting IT tool (Isometrix). |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | with host country laws and the IRMA Standard. | | Additionally, the Permitting Document Management Procedure (Anglo American, 2020) establishes the management and security aspects of permitting documents (e.g., storage, backup, controlled access, destruction).<br><br>Evidence of compliance with these procedures includes a sample report from the Isometrix Permits Register (October 7, 2025), which demonstrates the use of the Isometrix IT tool to manage and follow up on the company's permitting obligations. The site's completed Self-Assessment for the Renewal IRMA assessment confirms the company maintains records to track compliance and non-compliances with specific IRMA requirements.<br><br>During managerial interviews, the audit team observed the Isometrix system in use, including a review of randomly selected permits, associated compliance documentation, and evidence of actions taken to address potential non-compliances.<br><br>The evidence, supported by interviews and review of the tracking system, indicates the existence of internal processes and a dedicated IT tool (Isometrix) used to manage and follow up on compliances and and/or non-compliances with the host country legal requirements and that the company maintains sufficient records to track compliance against the IRMA Standard. |
| 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 | ● | The evidence reviewed includes government inspection reports (Environmental Management Agency, October 2025; Ministry of Labour, March and October 2025), indicating regulatory oversight and documented compliance. A sample of correspondence with authorities showcases proactive disclosure and discussion of exceptional events (e.g., controlled discharges from the Return |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | and final investigations, allegations, discussions, and final remedies. | | Water Dam in January 2026; air-monitoring schedule adjustments during the March 2024 smelter shutdown). The site's Non-Conformance Handling Process (Valterra Platinum, no date) outlines procedures for recording, investigating, and closing non-compliance events. Evidence of implementation includes non-conformance reports from a third-party audit (BSI, October 2023), corresponding internal forms (Anglo American, October 2023), and Isometrix screenshots showing tracking and closure. A Third-Party ISO Assessment Report (BSI, November 2025) indicates that these internal processes are implemented and reviewed.<br><br>The evidence indicates that records related to compliance and non-compliance with host-country laws are maintained and made available to auditors, including descriptions of non-compliance events, investigations, communications with regulators, and corrective actions. |
| 1.1.5.3. | Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available. | ● | The evidence reviewed includes the Corporate Safety, Health and Environmental (SHE) Policy (Valterra Platinum, June 2025) and the Unki SHE Policy (Valterra Platinum, July 2025), which indicates that the company is committed, at the corporate and mine site levels, to open and transparent communication with all stakeholders, including employees, local communities, business partners, suppliers, investors, and other interested parties, in SHE-related matters.<br><br>Interviews with relevant staff confirm that no legal compliance-related requests have been made by stakeholders, but that they would be provided upon request. |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | The evidence indicates that the company would provide stakeholders with publicly available information on the mining project's SHE-related regulatory non-compliance issues, if requested. |
| 1.1.5.4. | Where the operating company claims that records or documentation contains confidential business information, it shall:<br><br>a. Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and<br><br>b. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information. | ● | The evidence reviewed includes a Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes a process for receiving, reviewing, and responding to stakeholder information requests. The procedure specifies that where requested information contains confidential business information, only the confidential portions are to be redacted, with non-confidential information made available.<br><br>The evidence reviewed as part of the company's IRMA renewal assessment, including the evidence provided for this chapter and the following chapters, indicates that the company did not claim any records or documentation as confidential business information. No information was redacted, and all requested records were provided to the auditors in full. |

# Chapter 1.2—Community and Stakeholder Engagement

| | |
|---|---|
| Chapter Relevant? | Yes |
| Overall Chapter Score | 95% |
| Chapter Score Basis | 26.5 out of 28 possible points |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| 1.2.1.1. | The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities. | ● | The evidence reviewed includes a Stakeholder Engagement Procedure (Valterra Platinum, 2025), which outlines the methodology for stakeholder mapping, including classification criteria and analysis of potential influence and impact, and is complemented by a spreadsheet containing a Consolidated Function Stakeholder Engagement Plan (Unki Mine, 2025) that identifies function-specific stakeholders whose actions or interests may have social consequences. Supporting evidence includes a Stakeholder Database (Unki Mine, 2025), which provides operational detail, including contact information and engagement requirements, confirming that the mapping process is integrated into daily engagement, supplemented by annual Stakeholder Engagement Plans for the years 2023-2025 (Unki Mine, 2023- 2025). The Unki Stakeholder Engagement Plan 2025 presents a detailed framework for identifying potentially affected communities, rights-holders, and vulnerable sub-groups such as women, youth, and the elderly. The inclusion of influence, impact, and interest ratings enables prioritization of stakeholders and targeted engagement strategies. The 2024 and 2023 plans confirm continuity in this methodology and illustrate periodic updates to reflect changes in operational and contextual risks. Collectively, these documents demonstrate that the company has established a structured and iterative process for identifying, mapping, and analysing stakeholders who may be affected by or have an interest in mining-related activities. The process incorporates consideration of vulnerability, regular updating, and operational functions.<br><br>Interviews with company staff indicate that stakeholder mapping efforts are ongoing. Community stakeholders interviewed |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | confirmed that the company has identified key stakeholders who may be, or are, affected by the mine's operations.<br><br>The evidence, supported by interviews, indicates that the company has implemented a consistent and traceable approach to stakeholder identification and analysis. |
| 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. | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which defines overall objectives, guiding principles, and responsibilities for stakeholder engagement throughout the life of the mine. The document also outlines the processes for identifying and mapping stakeholders, planning engagement activities, and documenting outcomes, thereby operationalizing the company's commitment to meaningful and inclusive participation. Additional evidence includes the annual Stakeholder Engagement Plans (Unki Mine, 2023-2025), which demonstrate annual review and adaptation in response to evolving operational and contextual risks. Supporting evidence includes samples of quarterly Local Accountability Forum Minutes (Anglo American, 2023-2025) and issue-based meeting minutes (Anglo American, 2025) that confirm these plans are being implemented, in addition to the Grievance Procedure (Anglo American, 2024) and samples of Induction Training materials with attendance records (Anglo American, 2024-2025), that provide complementary evidence of the plan's implementation across multiple stakeholder interfaces ensuring staff are aware of engagement protocols and that communities can voice concerns through structured, documented channels. Collectively, these documents confirm that the company maintains a structured, regularly updated, and implemented stakeholder engagement |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | framework that is scaled to the operation's risks and potential impacts.<br>Interviews with company staff indicate that stakeholder engagement planning for the mine project has been established and implemented and is ongoing; and this was confirmed by community stakeholders, who cited the different engagement mechanisms established by the company.<br>The evidence, supported by interviews, indicates that the stakeholder engagement plan has been consistently applied during engagement forums and that feedback from affected communities informs subsequent updates. |
| 1.2.1.3. | The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups). | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes that communities are consulted to elect representatives to local accountability forums, including the Community Engagement Forum (CEF) and Community Environment Committee (CEC). The procedure describes the framework for stakeholder participation in these structures. The CEF Terms of Reference (Unki Mine, 2025) outline governance arrangements, member selection processes, and tenure. The document indicates that community representatives are elected and includes sign-off records reflecting participation across gender and age categories. Traditional leaders, including Chiefs, are identified as ex officio members, reflecting consideration of local cultural governance structures. The Stakeholder Engagement Plans (SEPs) (Unki Mine, 2023–2025) describe measures intended to promote inclusive engagement. The 2023 SEP identifies general barriers to participation. The 2024 SEP documents lessons learned, including measures to address limited |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | female participation. The 2025 SEP formalizes additional measures aimed at reducing engagement barriers for vulnerable groups. Supporting documentation includes Community Emergency Committee election planning minutes and attendance registers (Anglo American, March 2023), which show involvement of local leaders (e.g., councillors, village chairpersons, and secretaries) in election planning. Election results and attendance registers for Adare Farm, Chironde, Impali-Kodobo, and Pasimupindu villages document participation of elected representatives, including women and youth. A review of the Issues and Grievance Registers (Unki Mine, 2024–2025) indicates that no grievances have been submitted alleging exclusion or discrimination related to stakeholder engagement activities. A sample of Feedback Reports (2025) indicate that CEF representatives are expected to communicate forum outcomes to their respective communities.<br><br>Interviews with a sample of affected community members indicate that engagement opportunities are generally accessible and that measures have been taken to address participation barriers for some stakeholders, including women and vulnerable groups.<br><br>The evidence, supported by interviews, indicates that the company has established representative structures and documented measures intended to promote accessible, inclusive, and culturally appropriate engagement processes, and has taken steps to identify and address barriers to participation. |
| 1.2.1.4. | The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or | ● | The evidence reviewed includes the Stakeholder Engagement Plans (SEPs) (Unki Mine, 2023–2025), which outline engagement objectives, identify stakeholders, and describe adjustments made in response to prior engagement challenges. The SEPs reference past |

| Req # | Requirement | Score | Basis for Rating |
| --- | --- | --- | --- |
| | mitigate community conflicts that might otherwise occur as a result of company engagement processes. | | tensions and outline measures taken to address identified gaps in representation and participation. Additional evidence includes the Community Engagement Forum (CEF) Gap Analysis (Unki Mine, no date), which assesses the structure and composition of the prior CEF and identifies limitations in community representation, noting that membership had previously been limited to ward councillors. The analysis includes recommendations to broaden representation. The Local Accountability Strategy (Unki Mine, 2023–2025) outlines actions taken to strengthen the representation and legitimacy of engagement structures, including measures intended to address previously identified representational gaps.<br><br>Interviews with key staff from the community relations department indicate awareness of local governance structures, prior tensions related to the representativeness of CEF members, and factors influencing community dynamics.<br><br>The evidence, supported by interviews, indicates that the company has implemented structured and inclusive mechanisms to address historical engagement gaps and prevent potential conflicts through balanced representation, open dialogue, and functional grievance channels. |
| 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) | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which defines the scope, objectives, and responsibilities for stakeholder engagement across operational phases and outlines mechanisms for routine engagement through formal forums and issue-specific consultations. This procedure establishes a structured framework for ongoing stakeholder interaction. Additional evidence includes Stakeholder Engagement Plans (SEPs) (Unki Mine, 2023–2025), |

| Req # | Requirement | Score | Basis for Rating |
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| | | | which set out annual engagement objectives, identified stakeholder groups, planned activities, and monitoring measures. The 2023 SEP reflects the inclusion of Peak Farm due to its proximity to the open pit bulk sampling access road, and the 2025 SEP includes expanded engagement activities related to the Tailings Storage Facility (TSF) and associated operational components. These updates indicate periodic reviews and adjustments to engagement planning in response to operational developments. Supporting documentation includes Community Engagement Forum, Community Emergency Committee, and Community Environmental Committee meeting minutes (Unki Mine, 2023–2025), which record recurring meetings addressing environmental management, emergency preparedness, project updates, grievances, and risk-related matters. Masasa/Gutsa consultation minutes (Unki Mine, 11 April 2023; 11 February 2025) document issue-based engagement with specific communities regarding operational activities. TSF Dam Wall Failure Desktop Study minutes (29 February 2024) record engagement with potentially affected communities on risk scenarios and emergency preparedness measures.<br><br>Interviews with a sample of affected community members indicate that engagement activities are ongoing.<br><br>The evidence, supported by interviews, indicates that the company maintains structured and ongoing stakeholder engagement processes throughout the operational life of the mine, including routine forums and issue-specific consultations. |
| 1.2.2.2. | Critical. The operating company shall foster two-way dialogue and | ● | The evidence reviewed includes a Stakeholder Engagement Procedure (Valterra Platinum, 2025) and a Stakeholder Engagement Plan (Unki Mine, 2025), supported by minutes of |

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| | meaningful engagement with stakeholders by:<br>a. Providing relevant information to stakeholders in a timely manner,<br>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders,<br>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation,<br>d. Soliciting feedback from stakeholders on issues relevant to them, and<br>e. Providing stakeholders with feedback on how the company has taken their input into account. | | Community Engagement Forum (CEF) and Community Environment Committee (CEC) meetings covering Q1 2023 to Q2 2025. Additional documentation reviewed comprises Minutes of the Environmental and Social Impact Assessment Public Consultations (Black Crystal Consulting, 2023), Mutevekwi Primary School project meetings (Unki Mine, 2025), Masasa/Gutsa community meetings (Unki Mine, 2025), Grievance Registers (Unki Mine, 2023–2025), and Terms of Reference for the CEF (Unki Mine, 2025). Collectively, this evidence demonstrates that the company has established and maintains a process for two-way dialogue and meaningful engagement with stakeholders, as outlined below:<br>a. Provision of relevant information in a timely manner: The Stakeholder Engagement Procedure and CEF meeting records confirm that the company regularly discloses information through established forums, project-specific consultations, and ESIA meetings. Records from 2023 to 2025 demonstrate consistent communication of project updates and decisions, indicating progress toward timely and transparent information sharing.<br>b. Inclusion of site management and subject-matter experts: Records from CEF (June 2025) and CEC (March 2025) meetings show the active participation of management and technical specialists from environmental, community, and operations departments. Additional consultations, including those for the ESIA and Mutevekwi School project, illustrate direct technical input into community discussions.<br>c. Respectful engagement, free from manipulation or intimidation: The Stakeholder Engagement Procedure states that stakeholder meetings shall be conducted in a conducive and inclusive environment, without fear of judgment, manipulation, or negative |

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| | | | consequences. The Incidents and Grievance Procedure (Unki Mine, 2024) and CEF training sessions (2023–2024) document clear engagement principles emphasizing good faith, care, and respect. Meeting records and Minutes of the ESIA Public Consultation contain both positive and negative feedback reaffirming these principles, and the grievance log reviewed contained no evidence of coercion or intimidation.<br><br>d. Soliciting stakeholder feedback: Minutes from community meetings (Masasa/Gutsa, Peak Farm, 2023–2025), the ESIA public consultation, and CEF discussions indicate that community feedback is actively sought and recorded. The CEF Terms of Reference further confirm a structured process for capturing and discussing community input. Grievance Registers for 2023 and 2024, and Q1–Q3 2025 (Unki Mine, 2023-2025) confirm that the company systematically tracks stakeholder feedback through closure.<br><br>e. Providing feedback on how stakeholder input was considered: Evidence from Masasa/Gutsa minutes (February 2025) and photographic proof of a new village assembly point demonstrate tangible follow-up to stakeholder suggestions. CEF meeting minutes include a dedicated section for discussing outstanding matters from previous engagements. Entries in the Grievance Register (2025) also show acknowledgment and closure steps, reflecting a functioning feedback loop, which is further supported by a sample of grievance acknowledgement receipts and resolutions (Unki Mine, 2023 -2025) that are signed by the mine and complainant, indicating that a direct feedback loop for grievances exists. |

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| | | | Overall, the documentation confirms that Unki Mine has formal structures and procedures primarily through the CEF and CEC to facilitate ongoing two-way dialogue.<br><br>Interviews with community stakeholders indicate that communication with the mine has improved in recent years through the CEF and CEC engagements. Stakeholders reported that the company provides relevant information in a timely manner (a), includes appropriate personnel during community engagements (b), and conducts engagements in a respectful manner (c). Stakeholders also reported that the company solicits community feedback during the community forums (d) and, in most cases, provides information on how community input has been considered (e). Most communities expressed satisfaction with the CEF process. A small number of stakeholders reported that not all feedback raised through the CEF receives a clear response from the company (e).<br><br>The evidence, supported by interviews, indicates that the company has established structured and recurring engagement mechanisms to support two-way dialogue with stakeholders and reflect progress over time toward meeting the intent of sub-requirements (a) through (e). |
| 1.2.2.3. | The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees | ◕ | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes the framework for stakeholder engagement and formal mechanisms to facilitate consultation and stakeholder input on environmental and social performance matters. The Community Engagement Forum (CEF) Terms of Reference (Unki Mine, 2025), which defines the forum's purpose, structure, governance arrangements, and |

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| | 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. | | member selection process. The mandate of the CEF includes review and discussion of operational updates, environmental and social performance, and community concerns. Additional evidence includes the Community Environment Committee Terms of Reference (Valterra Platinum, 2025), which establishes a committee focused on environmental issues and community safety. The terms of reference describe participation by community representatives and company personnel and provide for review of environmental monitoring results and related issues. Meeting minutes from 2023–2025 document discussions of environmental performance data and community awareness activities within these forums. Both Terms of References for CEC and CEF, as well as the Community Emergency Preparedness and Response Coordinators (CEPRC) Terms of Reference (Unki Mine, 2023) indicate that all members have reviewed and agreed to the engagement mechanism including the engagement frequency, as evidenced by their signature.<br><br>Interviews with a sample of affected community members indicated that the quarterly meeting frequency may limit timely input on certain issues.<br><br>The evidence indicates that the company has established formal engagement mechanisms, in collaboration with community representatives intended to provide stakeholder oversight of environmental and social performance and to enable input on issues of concern.<br><br>The evidence does not include documentation confirming that the company collaborates with a broad range of stakeholders to ensure the stakeholder engagement mechanism continues to meet |

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| | | | stakeholder expectations, as some stakeholders reported they are not satisfied with the frequency of meetings. |
| 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. | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which describes the company's approach to stakeholder engagement, including the use of local accountability forums and issue-based consultations. The procedure references consideration of local customs and identifies mechanisms intended to facilitate participation of different stakeholder groups. Further evidence reviewed includes the Stakeholder Engagement Plan (SEP) (Unki Mine, 2025), which outlines planned engagement activities and measures intended to support participation, and references actions to address potential logistical barriers to participation, including conducting meetings within affected communities and providing support to facilitate attendance where needed. The Community Engagement Forum (CEF) Terms of Reference (Unki Mine, 2025) define the forum's structure, governance, and membership, and indicate inclusion of elected male and female community representatives, as well as representation of youth and persons with disabilities within the forum structure. Supporting evidence includes the CEF Election Results and Attendance Registers (Unki Mine, 2023) for Adare Farm, Chironde, Impali-Kodobo, and Pasimupindu, which document community involvement in selecting representatives and reflect participation by both women and men.<br><br>Interviews with a sample of stakeholders of mixed gender at the time of the on-site audit indicated that women and other marginalized and vulnerable groups have opportunities to participate in company-led engagement activities and to express |

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| | | | concerns. Additionally, they reported that engagement opportunities are generally accessible and that measures have been taken to address participation barriers for some stakeholders, including women and potentially vulnerable groups.<br><br>The evidence, supported by interviews, indicates that the company has established engagement processes intended to be accessible and culturally appropriate and has taken steps to include participation by women, men, and representatives of marginalized or vulnerable groups. |
| 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. | | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes the framework for engagement through elected community representatives and outlines expectations regarding transparency, representativeness, and two-way communication between representatives and their constituencies. The Local Accountability Strategy (2023–2025) outlines measures to strengthen the legitimacy and effectiveness of representative structures. The Stakeholder Engagement Plans (Unki Mine, 2025) reference ongoing review of engagement mechanisms and identification of actions to address gaps in communication or participation. Supporting evidence includes the Community Engagement Forum (CEF) Election Results and Attendance Registers (Unki Mine, 2023), which document village-level elections for Adare Farm, Chironde, Impali-Kodobo, and Pasimupindu, and indicate participation by community members in the selection of male and female representatives. A sample of 2025 feedback reports indicates that CEF representatives are expected to communicate forum outcomes to their respective communities. |

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| | | | Interviews with a sample of affected community members indicate that, while representatives are formally elected and engagement forums are in place, some community members reported concerns that representatives do not consistently reflect community views and that information from the forums is not communicated back to the broader community consistently.<br><br>The evidence indicates that the company has established formal processes to select community representatives and has defined expectations for two-way communication.<br><br>The evidence, supported by interviews, does not indicate that the company has systematically verified whether community representatives continue to reflect the views and interests of affected community members and can be relied upon to consistently communicate relevant information to them, nor that it has implemented additional engagement measures where concerns regarding representativeness or communication effectiveness have been identified. |
| 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. | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes requirements for documenting stakeholder engagement activities, including maintaining attendance records, capturing stakeholder input, recording company responses, and retaining signed minutes in a centralized system accessible for review. Additional evidence reviewed includes the Stakeholder Engagement Plans (Unki Mine, 2023–2025), which outline planned engagement activities and reference the use of attendance registers and feedback templates to document participation and discussion outcomes. Supporting evidence includes meeting minutes and attendance registers from |

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| | | | the Community Engagement Forum, Community Environment Committee, and Community Emergency Committee (Unki Mine, 2023–2024), which document engagement activities and include participant lists, stakeholder-identified issues, discussion summaries, action items, and identified responsible persons. In addition, the Stakeholder Feedback Reports and issue-based meeting minutes (e.g., Masasa/Gutsa, February and April 2025) record stakeholder inputs and company responses or follow-up commitments.<br><br>The evidence indicates that the company has established and consistently implemented a documentation system for stakeholder engagement that captures participation, issues raised, and company responses. |
| 1.2.2.7. | The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes. | ● | The evidence reviewed includes Public Disclosure Minutes (Solar PV Project) (Black Crystal, 2023), which document stakeholder meetings, including participant names, questions and comments raised, and recorded company responses; and the Stakeholder Engagement Summary Report for the Solar PV Project (ERM, SLR & Black Crystal, 2023), which consolidates stakeholder inputs received during consultations and describes corresponding company actions or mitigation measures, indicating formal feedback to participants. Supporting evidence includes the Community Engagement Forum (CEF) meeting minutes and attendance registers (Unki Mine, 2025), CEF presentations (2024–2025), Issues and Grievance Registers (Unki Mine, 2024), and issue-based engagement minutes (Unki Mine, 2024). These documents reflect periodic reporting back on environmental, social, and project-related matters, as well as on grievance outcomes or project updates. |

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| | | | The evidence indicates that the company has established processes to report back to affected communities and stakeholders on issues raised during engagement activities, including formal forums, project-specific disclosure meetings, and grievance follow-up. |
| 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. | ● | The evidence reviewed includes the Stakeholder Needs and Training Plans (Unki Mine, 2024–2025), which identify annual training priorities for community representatives and other stakeholders. The plans reference topics such as grievance processes, environmental awareness, health and safety, and emergency preparedness, and outline proposed capacity-building activities intended to support stakeholder participation in engagement and oversight processes. Additional evidence includes the Local Accountability Strategy (Unki Mine, 2025), which references efforts to strengthen community-level participation through structured engagement and training; as well as Environmental Impact Assessment reports (Scot Wilson, 2003; ASCON Africa, 2016; Black Crystal, 2020 and 2021; SLR, 2023), which document stakeholder consultations conducted as part of environmental assessment processes, including information-sharing intended to support informed participation. Supporting evidence includes Community Engagement Forum (CEF) minutes (Q1 2023; Q1 2025), which document discussions regarding training initiatives and social commitments. The Q1 2025 Social Commitments Register tracks implementation of agreed actions, including training and awareness programs. The Q2 2024 Emergency Preparedness and Response meeting minutes and the Q2 2023 Disaster Recovery Planning confirm that training sessions |

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| | | | were conducted for community members on emergency response and first aid.<br><br>Interviews with community stakeholders indicate that the company provided appropriate assistance where gaps were identified.<br><br>The evidence, supported by interviews, indicates that the company has established a structured, participatory approach to assessing and strengthening community capacity for engagement. |
| 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 evidence reviewed includes the Safety, Health and Environment (SHE) Policy (Valterra Platinum, 2025), which outlines commitments related to transparency, stakeholder engagement, and disclosure of environmental, safety, and social performance information, subject to applicable legal and confidentiality constraints; and the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes a process for receiving, reviewing, and responding to stakeholder information requests. The procedure specifies that where requested information contains confidential business information, only the confidential portions are to be redacted, with non-confidential information made available. Supporting evidence includes the Q1 2025 Community Engagement Forum minutes (Unki Mine, 2025), which record that community representatives were informed of the process for requesting operational, environmental, and social performance information through established engagement channels.<br><br>Interviews with a sample of affected community members indicate that, at the time of the audit, no specific requests had been made for information related to the mine's performance against the IRMA Standard. |

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| | | | The evidence indicates that the company has established documented procedures and tracking mechanisms to make information related to mine performance available to stakeholders upon request, subject to reasonable limitations and protection of legitimate confidential business information. |
| 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. | — | Not relevant. There is no indication of any requests for information were deemed unreasonable. |
| 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 | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), which establishes the operation's commitment to timely and accessible information-sharing throughout the life of the mine and assigns responsibilities for preparing and disseminating notices, reports, and updates via locally appropriate communication channels. Additional evidence includes Stakeholder Engagement Plans (Unki Mine, 2023–2025), which operationalize this requirement by defining engagement schedules, translation practices, and the use of both in-person and digital communication tools to reach diverse stakeholder groups. Supporting evidence includes Community Engagement Forum agendas, presentations, and meeting minutes (Unki Mine, 2024–2025), which indicate that information on operational and environmental matters, including TSF expansion, Solar PV development, and safety initiatives, is routinely shared in advance of meetings. Presentation materials use simplified language and |

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| | | | visual aids to enhance comprehension. Furthermore, screenshots of WhatsApp notifications and email invitations demonstrate timely dissemination of information, including routine meeting notices and operational updates (e.g., blasting schedules and safety alerts).<br><br>Interviews with a sample of stakeholders confirm that information is generally received in a timely manner, in understandable formats, and in appropriate languages (English and Shona). Interviewees indicated they have access to relevant documents and updates through established communication channels.<br><br>The evidence, supported by interviews, indicates that communications are conducted in a timely manner and that information is provided in culturally appropriate formats and languages that are accessible to affected communities and stakeholders. |
| 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. | — | Not relevant. The evidence reviewed includes the Information Request Tracker (Unki Mine, 2024–2025), which records stakeholder requests for information related to the mine's operations, environmental and social performance, and performance against the IRMA Standard. A review of the tracker for the audit period indicates that no information requests were withheld, delayed, or deemed unreasonable. All recorded requests were addressed and closed within documented timeframes.<br><br>Interviews with a sample of community representatives confirm that information requests are typically raised through Community Engagement Forums or related engagement channels and that responses are provided in full and in a timely manner. |

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| | | | The evidence, supported by interviews, indicates that there were no instances during the audit period in which information was withheld or not provided in a timely manner. |

## Chapter 1.3—Human Rights Due Diligence

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 95% |
| Chapter Score Basis | 21 out of 22 possible points |

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| 1.3.1.1. | Critical. The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights | ● | The evidence reviewed includes Anglo American's Human Rights Policy (Anglo American, October 2021), a corporate-level policy adopted by Valterra Platinum, its subsidiaries, and contractors, and publicly disclosed by the company. The policy sets out the company's commitment to respect all internationally recognized human rights, particularly those set out in the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. The policy also references the International Labour Organization Declaration on Fundamental Principles and Rights at Work and commits to respecting international humanitarian law where applicable. The policy outlines Anglo American's responsibility to identify human rights risks and adverse impacts, and to contribute |

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| | | | positively to their prevention or mitigation. The policy is available online (https://www.angloamerican.com/sustainable-mining-plan/our-critical-foundations/human-rights).<br><br>The evidence indicates that the company acknowledges its responsibility to respect and promote all internationally recognized human rights of its employees, contractors, business partners, and the local communities affected by its operations. |
| 1.3.1.2. | The policy shall:<br><br>a. Be approved at the most senior level of the company;<br><br>b. Be informed by relevant internal and/or external expertise;<br><br>c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project;<br><br>d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders;<br><br>e. Be reflected in the mining project's operational policies and procedures. | ● | The evidence reviewed includes a Group Human Rights Policy (Anglo American, October 2021), which applies globally across Anglo American and its subsidiaries, and remains applicable at Valterra Platinum until it is superseded. Additional evidence reviewed includes the site-level security procedures: Use of Force Procedure (Anglo American, March 2022), Use of Firearms Procedure (Anglo American, June 2021), and Arrest and Detention of a Suspect Procedure (Anglo American, April 2025); supported by the Q1 Community Engagement Forum Meeting Minute (Anglo American, March 2025).<br><br>The evidence indicates that the policy:<br><br>a. was originally approved at the most senior level of the Anglo American group structure, as the policy assigns accountability for implementation to the Group Chief Executive and business unit Chief Executives, and has been separately approved by senior leadership within Valterra Platinum following the demerger .<br><br>b. was informed by relevant internal and/or external expertise, as the policy references internationally recognized human rights |

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| | | | frameworks and expectations relevant to corporate human rights responsibility and due diligence.<br><br>c. stipulates human rights expectations for personnel, business partners, and other parties directly linked to the mining project, as the policy scope and expectations apply to relationships with employees, contractors, and business partners and include expectations related to risk-based due diligence and reporting of suspected labour and/or human rights abuse.<br><br>d. is communicated internally, as indicated by the Q1 Community Engagement Forum Meeting Minute, which records a "human rights policy refresher awareness" session and distribution of copies to attendees, and externally, as a sample of New Employee Induction Forms (Anglo American, 2024–2025) confirm employees are informed of policies and procedures related human rights (e.g., Code of Conduct; policy on Bullying, Harassment and Victimisation; grievance procedures); and<br><br>e. is reflected in the mining project's operational policies and procedures, such as the Code Of Conduct (Valterra Platinum, June 2025), Disciplinary Hearing and Grievance Handling Procedure (Unki Mines, May 2022), and site-level security procedures, which reference recognized frameworks relevant to security and human rights (e.g., Voluntary Principles on Security and Human Rights; UN Basic Principles on the Use of Force and Firearms), and supported by interviews indicating that the policy's expectations are applied through site operational procedures.<br><br>Interviews with stakeholders, including community members, indicate that the Human Rights Policy has been communicated. Interviews with workers and contractors indicate that the Human |

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| | | | Rights Policy is internally communicated, including to relevant business partners and other parties directly linked to the mining project, as well as implemented, as the policy is reflected in the mining project's operational policies and procedures. Interviews with site management confirmed that the group policies remain in force following the demerger, with legacy policies expected to be progressively replaced by Valterra Platinum–specific policies. Interviews with workers, including contractors, indicate awareness of the company's policies and procedures related to human rights.<br><br>The evidence reviewed, supported by interviews, indicates that the policy complies with sub-requirements (a–e). |
| 1.3.2.1. | Critical. The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment. | ● | The evidence reviewed includes the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), an internal mechanism used to manage social and human rights risks across the mine's operations. The SHIRA tool originated under the Anglo American Social Way Toolkit (September 2022), which set out corporate standards, processes, and procedures for social performance, including the Social Way Standard (Requirement 3C). Following the transition to Valterra Platinum, the SHIRA methodology has continued to be used and implemented at the site.<br><br>The toolkit outlines that human rights risks must be assessed and reviewed annually, considering the site context, stakeholder engagement, grievance records, and significant changes in the operating environment. The evidence is further supported by the Community Health, Wellbeing and Safety Impact Assessment Report (BioSwitch Africa, 2024), which is a third-party study |

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| | | | commissioned by the mine and includes a comprehensive review of community health and safety risks associated with the mine site.<br><br>Interviews with company staff confirmed that there is an established ongoing process to identify and assess potential risks and actual human rights impacts that covers a broad range of internationally recognized human rights, and is updated on a regular basis, including, at a minimum, when significant changes occur in the mining project, business relationships, or the operating environment.<br><br>The evidence, supported by interviews, indicates that there is an ongoing process in place to update the company's human rights risks and impacts assessment on a regular basis or when a significant change to the project prompts a re-assessment. |
| 1.3.2.2. | Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:<br><br>a. Follow a credible process/methodology;<br><br>b. Be carried out by competent professionals; and<br><br>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 | ● | The evidence reviewed includes the Community Health, Wellbeing and Safety Impact Assessment Report (BioSwitch Africa, 2024) and the associated consent forms (BioSwitch Africa, 2024). The evidence reviewed also includes the Environmental and Social Impact Assessment for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), the Stakeholder Engagement Summary Report for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), and meeting minutes with Masasa community (Unki Mine, 11 April 2023). In addition, CVs were provided for members of the assessment teams (BioSwitch Africa, 2024; SLR Consulting, 2023) as supporting evidence of assessor competence.<br><br>The evidence indicates that the assessments:<br><br>a. followed a credible process/methodology, as the assessment reports describe structured approaches and document the use of |

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| | other vulnerable groups, and other relevant stakeholders. | | established impact assessment and stakeholder engagement processes, including documented consultation activities and recorded stakeholder inputs.<br><br>b. were carried out by competent professionals, as the evidence package includes the curriculum for assessment team members associated with the CHWSIA and the Solar PV ESIA workstreams.<br><br>c. drew on external expertise and consultations with potentially affected rights holders and other relevant stakeholders, as indicated by the stakeholder engagement documentation and supporting records (including consent forms and community meeting minutes).<br><br>Interviews with stakeholders, including community members, and with key personnel, indicate that the assessments were undertaken using a credible methodology, by competent professionals, and that they drew on internal and/or external human rights expertise and consultations with potentially affected rights holders (including women and other vulnerable groups) and other relevant stakeholders, consistent with sub-requirements (a) through (c).<br><br>The evidence indicates that the assessments follow a credible process/methodology, were carried out by competent professionals, and draw on expertise and stakeholder consultation, consistent with sub-requirements (a) through (c). |
| 1.3.2.3. | As part of its assessment, the operating company shall document, at minimum:<br><br>a. The assessment methodology; | ● | The evidence reviewed includes the Environmental and Social Impact Assessment for a Solar PV Facility at Unki Mine (SLR, June 2023), the Stakeholder Engagement Summary Report for a Solar PV Facility at Unki Mine (SLR, June 2023), the Community Health, Wellbeing and Safety Impact Assessment Report (CHWSIA) |

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| | b. The current human rights context in the country and mining project area;<br><br>c. Relevant human rights laws and norms;<br><br>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;<br><br>e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, Indigenous Peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group;<br><br>f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. | | (BioSwitch Africa, 2024), and the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025). The evidence includes:<br><br>a. the assessment methodology: documented in the 2023 ESIA and the 2024 CHWSIA, and supported by the structured assessment fields within the 2025 SHIRA;<br><br>b. the current human rights context in the country and mining project area: documented in the 2023 ESIA baseline/context sections, and supported by contextual risk framing within the 2024 CHWSIA and the 2025 SHIRA;<br><br>c. relevant human rights laws and norms: documented in the 2023 ESIA legislative and standards framework and referenced within the 2024 CHWSIA and the 2025 SHIRA through applicable legal/standards framework fields or references;<br><br>d. a comprehensive list of human rights risks related to mining project activities and business relationships, and an evaluation of potential severity: documented through the 2023 ESIA impact/risk findings and 2024 CHWSIA risk/impact findings, and operationalized in the 2025 SHIRA through risk/event entries, consequence/severity characterization, and risk ranking fields;<br><br>e. identification of rights holders and analysis of differential risks to and impacts on rights holder groups (including references to potentially vulnerable groups): documented in the 2023 ESIA socio-economic baseline and vulnerability-related sections and the 2023 Stakeholder Engagement Summary Report through stakeholder identification and consultation records, and supported by the 2024 |

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| | | | CHWSIA and the 2025 SHIRA fields intended to capture impacted stakeholder/rights holder group information; and<br><br>f. recommendations for preventing, mitigating and remediating identified risks and impacts (giving priority to salient issues): documented in the 2023 ESIA mitigation/management measures and ESMP-related content and the 2024 CHWSIA recommendations, and captured in the 2025 SHIRA through documented controls, recommended actions, ownership, and action-planning fields.<br><br>Interviews with stakeholders, including community members, indicate that the company's human rights risk and impact assessments document what is required under sub-requirements (a) through (f).<br><br>The evidence indicates that the company documents the requirements listed under sub-requirements (a) through (f) within its assessment documentation, including the assessment methodology, context, legal/normative framework, risk identification and severity evaluation, rights holder considerations, and recommended prevention/mitigation/remediation measures. |
| 1.3.2.4. | At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them and shall be consulted to provide feedback on those findings. | ● | The evidence reviewed includes the Stakeholder Engagement Summary Report (SLR, June 2023), which indicates that stakeholders were notified of the availability of the draft Environmental and Social Impact Assessment Report for a 30-day public review and comment period (11 May to 12 June 2023). The report further indicates that a Non-Technical Summary was provided to facilitate stakeholder review, including translation into Shona and availability in hard copy at local access points, to support |

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| | | | meaningful review and comment on the draft assessment findings. The evidence is supported by minutes of Community Engagement Forum (CEF) and Community Environment Committee (CEC) meetings covering Q1 2023 to Q2 2025, which also indicate that stakeholder feedback is captured and addressed through a documented comments-and-responses process, and that there is an established ongoing engagement with community representatives.<br><br>Interviews with stakeholders, including a sample of affected community members, indicate that those rights holders who participated in the assessment processes were provided the opportunity to review draft key issues and findings relevant to them and were consulted to provide feedback prior to finalization.<br><br>The evidence indicates that stakeholders and rights holders who participated in the community forums had the opportunity to review draft key issues and findings relevant to them and were consulted to provide feedback on those findings through a documented review-and-comment process. |
| 1.3.2.5. | The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level. | ● | The evidence reviewed includes the Environmental and Social Impact Assessment for a Solar PV Facility at Unki Mine (SLR, June 2023), which includes impact findings and mitigation measures intended for implementation at the site level, the SHIRA WRAC risk assessment register (Valterra Platinum, October 2025), which indicates a process to review implementation and effectiveness of controls at the operational level, the Security Risk Assessment register (Unki Mine, 2025), which indicate operational integration of assessment outputs by recording unwanted events and consequences relevant to identified risks, documenting current |

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| | | | preventative and mitigatory controls, assigning functional ownership, and including action-planning fields (e.g., agreed actions, responsible persons, and timeframes), and the Unki Complex Baseline Risk Assessment Register (Unki Mine, June 2023), which further includes an annual evaluation mechanism to assess whether controls are being implemented and whether they are working (Yes/No/Partially).<br><br>Interviews with key staff indicate that the company has an established ongoing process to guarantee that assessment findings are integrated into site-level operational planning and risk management processes, and periodic reviews of control effectiveness.<br><br>The evidence indicates that the company has taken steps to effectively integrate assessment findings at the mine site management systems, incorporation into site risk registers and the definition of operational controls, responsibilities, action planning, and periodic evaluation of control implementation and effectiveness. The evidence further indicates that the identification, prevention, mitigation, and remediation of adverse human rights impacts are incorporated into site-level management processes, have been systematically revised, and are recognized within broader company systems. |
| 1.3.3.1. | Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), Your Voice Platform material (Anglo American, no date), the Unki Mine Social Performance Annual Refresher Induction Training (Anglo American, 2024), Community Engagement Forum (CEF) meeting minutes (Unki Mine, October 2023; September 2024), and the Stakeholder Engagement |

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| | and seek recourse for grievances related to human rights. | | Summary Report for a Solar PV Facility at Unki Mine (SLR, June 2023). The documentation indicates that mining project stakeholders have access to an operational-level grievance mechanism intended to be rights-compatible. The Grievance Procedure describes defined channels through which internal and external stakeholders may raise grievances and issues, and outlines a documented process for grievance management, including acknowledgement, investigation, response, and feedback. The procedure further indicates that grievances are recorded in a register or system and that information on grievance trends and/or progress is communicated through local accountability forums, including the Community Engagement Forum. The procedure also states that use of the grievance mechanism does not limit access to other appropriate channels or remedies.<br><br>The evidence reviewed also indicates additional mechanisms through which human rights-related concerns can be raised, including the Your Voice channel, which is described as an independent mechanism intended to allow concerns to be raised confidentially and anonymously. The induction (and refresh) training materials include grievance-related content and questions, which indicate internal communication of grievance channels to personnel. The Stakeholder Engagement Summary Report indicates that the grievance mechanism is intended to be communicated to external stakeholders as part of engagement activities and through notices.<br><br>Interviews with a sample of affected stakeholders indicate that they are aware of the operational-level complaints and grievance mechanism, including CEF meetings for external stakeholders and the Your Voice Platform for internal stakeholders, as mechanisms |

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| | | | for raising concerns related to human rights impacts associated with company activities.<br><br>The evidence indicates that mining project stakeholders have access to and are informed about a rights-compatible grievance mechanism and additional channels through which human rights-related concerns may be raised, including an anonymous reporting mechanism. |
| 1.3.3.2. | Responding to human rights risks related to the mining project:<br><br>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).<br><br>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 | ● | The evidence reviewed includes the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), the Environmental and Social Management Plan for the Unki Solar PV Project (SLR, June 2023), the Memorandum of Understanding (MOU) with the Police (Unki Mine and Zimbabwe Republic Police, 2022), the Voluntary Principles on Security and Human Rights (VPSHR) Declaration (Zimbabwe Republic Police, 2025), the VPSHR training registers (Unki Mine, 2025), minutes of Community Engagement Forum (CEF) and Community Environment Committee (CEC) meetings covering Q1 2023 to Q2 2025, and the Responsible Sourcing Standard for Suppliers (Anglo American, 2020).<br><br>The evidence indicates that the company has identified human-rights-relevant risks associated with mining-related activities and business relationships and has documented measures intended to address those risks, as follows:<br><br>a. has established measures intended to prevent and mitigate adverse human rights impacts through site-level controls, risk registers, and management plans, prioritizing prevention over |


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| | prevent or mitigate their contributions to the human rights risks.<br><br>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. | | mitigation and with stakeholder input through engagement mechanisms (including the Community Engagement Forum);<br><br>b. has taken actions to address risks where it may contribute to adverse human rights impacts, including the implementation of internal controls, corrective actions informed by root cause analyses, and cross-functional review of risk assessment findings through tools such as SHIRA; and<br><br>c. has established mechanisms intended to influence business relationships, including formal agreements with public security providers (e.g., Memos of Understanding [MOU]), alignment with the VPSHR (including training and commitments), and supplier requirements through the Responsible Sourcing Standard.<br><br>Interviews with company staff indicate that findings are discussed with relevant departments, a Root Cause Analysis is conducted, and corrective actions are developed collaboratively across functions, resulting in the SHIRA (Valterra Platinum, October 2025). Interviews with a sample of stakeholders, supported by the CEF meeting minutes, indicate that they were consulted during the design of mitigation strategies.<br><br>The evidence, supported by interviews, indicates that the company has documented steps intended to prevent and/or mitigate human-rights-related risks associated with its mining-related activities and business relationships, including measures to prevent or mitigate potential impacts and measures intended to influence relevant business relationships (including public security arrangements and supplier expectations), consistent with sub-requirements a-c. |

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| 1.3.3.3. | Critical. Responding to actual human rights impacts related to the mining project:<br>a. If the operating company determines that it has caused an actual human rights impact, the company shall:<br>i. Cease or change the activity responsible for the impact; and<br>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;<br>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 | — | Not relevant. The evidence reviewed includes the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), which does not indicate that the company has caused any actual human rights impacts.<br>The evidence reviewed, supported by onsite observations and interviews with external and internal stakeholders, does not indicate that the company has caused any actual human rights impacts. |

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| | mitigate and remediate the remaining impact;<br><br>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<br><br>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. | | |
| 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. | ● | The evidence reviewed includes the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), which documents identified human rights-related risks associated with mining activities and business relationships, as well as measures intended to prevent or mitigate them. Additional evidence reviewed includes reports used to support monitoring of identified risks and evaluation of related actions, including the Monitoring and Evaluation – Security-Related Risks, Impacts and Controls (Anglo American, April 2024), the Unki Mine Quarterly Environmental Management Plan and Monitoring Report – Q2 2025 (Unki Mine/Valterra Platinum, July 2025), and Voluntary Principles |

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| | | | on Security and Human Rights reports (Anglo American, 2022 and 2023). Further evidence reviewed includes participatory monitoring records, such as the Participatory Water Quality Monitoring Q1 2025 Attendance Register (Anglo American, 18 March 2025), the Participatory Air Quality Monitoring Q1 2025 Attendance Register (Anglo American, 19 March 2025), and minutes from Community Engagement Forum (CEF) meetings covering Q1 2023 through Q2 2025, and indicate that information on measures taken to address identified potential adverse human rights risks was communicated to local stakeholders, including affected community members, and that opportunities were provided for feedback through established engagement forums.<br><br>Interviews with community members and key personnel indicate that the company monitors whether selected salient adverse human rights risks and impacts are being addressed, using qualitative and quantitative indicators and incorporating feedback from internal and external sources, including affected rights holders.<br><br>The evidence indicates that the company has established monitoring activities that include qualitative and quantitative indicators and draw on internal records and external sources of input, including participatory monitoring and stakeholder engagement forums, to assess whether salient human rights risks are being addressed. |
| 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 | — | Not relevant. Throughout its internal monitoring and management processes, the company has not identified circumstances that |

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| | prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:<br>a. The company shall fund the external monitoring; and<br>b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. | | would trigger external monitoring of its human rights due diligence under this requirement.<br>The evidence does not indicate that the company's due diligence efforts repeatedly failed to prevent, mitigate, or remediate actual human rights impacts, or that the company has unknowingly or unintentionally caused, contributed to, or been linked to any serious human rights abuses. Therefore, no external monitoring of human rights due diligence has been initiated. |
| 1.3.5.1. | The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts. | ◐ | The evidence reviewed includes the Sustainability Report 2024 (Anglo American, 2024) and the Sustainability Report 2023 (Anglo American, 2023), which are publicly disclosed documents intended for external stakeholders that describe the company's human rights due diligence approach and include public reporting on selected human-rights-related topics. Additional evidence includes minutes from Community Engagement Forum (CEF) meetings covering Q1 2023 through Q2 2025, which indicate that detailed information related to salient human rights risks, associated mitigation measures, and outcomes is shared with local stakeholders through these forums.<br>Interviews with local stakeholders confirm that information related to the company's human rights due diligence activities, including salient human rights risks and impacts and related mitigation |

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| | | | measures, is shared and discussed through CEF meetings, and that these forums provide opportunities for feedback on the effectiveness of those actions.<br><br>The evidence indicates that the company's corporate owner periodically reports publicly on its human rights due diligence approach and selected human-rights-related actions and outcomes. Additionally, the evidence indicates that, at the local level, information shared through the CEF includes discussions of salient human rights risks and impacts, as well as actions taken to prevent, mitigate, and/or remediate those risks, with opportunities for stakeholder feedback.<br><br>The evidence reviewed does not indicate that the publicly available sustainability reports include the methods used to determine salient human rights issues, a consolidated list of salient human rights risks and impacts, and a consolidated description of actions taken by the company to prevent, mitigate, and/or remediate those risks and impacts. |
| 1.3.5.2. | If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations. | — | Not relevant. Throughout its internal monitoring and management processes, the company has not identified the need for external monitoring of its human rights due diligence system.<br><br>The evidence does not indicate that the company's due diligence efforts repeatedly failed to prevent, mitigate, or remediate actual human rights impacts, or that the company has unknowingly or unintentionally caused, contributed to, or been linked to any serious human rights abuses. Therefore, no external monitoring of human rights due diligence has been initiated. |

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| 1.3.5.3. | Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization. | — | Not relevant. The evidence reviewed includes Anglo American's Group Data Policy (Anglo American, April 2022), which applies across Anglo American and its subsidiaries, including Valterra Platinum, and establishes requirements for data protection and the handling of confidential information.<br>The evidence reviewed, supported by onsite observations and interviews with external and internal stakeholders, does not indicate that any confidential business information or other sensitive information was excluded from public reporting. |

## Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 91% |
| Chapter Score Basis | 20 out of 22 possible points |

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| 1.4.1.1. | Critical. The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as "stakeholders") have access to an operational-level mechanism that allows them to raise | ● | The evidence reviewed includes a Grievance Procedure (Anglo American, February 2025), which establishes the framework for managing issues, grievances, and incidents raised by stakeholders regarding the site and its contractors' activities. Supporting materials include Grievance Posters (Valterra Platinum, July 2025) in English and Shona, which describe the available channels for submitting grievances, such as (1) e-mail, (2) phone, (3) letter, (4) in |

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| | 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. | | person, or (5) anonymously via suggestion boxes in Chironde and at the mine. Stakeholders may also report grievances directly or through third parties at local accountability forums or existing local leadership structures. A comparison with grievance posters previously issued under Anglo American indicates that, despite the change in site management to Valterra Platinum, the grievance reporting channels have remained the same.<br><br>Additional evidence includes a Grievance Mechanism Awareness Tracker (Valterra Platinum, updated Q2 2025), which records engagements and training sessions conducted with external stakeholders, internal departments, and contractor groups to raise awareness about the grievance mechanism. The tracker includes photographic evidence showing the placement of grievance posters on internal noticeboards and at community locations such as the Chironde clinic and business centre. It indicates that communities are primarily informed about the mechanism through posters displayed at community engagement forums and committee meetings, while employees and contractors receive information during the annual Social Way Refresher Induction (Anglo American, undated), which summarizes the grievance procedure.<br><br>A sample of minutes from Community Engagement Forum meetings (Anglo American, December 2023 and June 2024) further demonstrates the operation and use of the grievance mechanism. The December 2023 meeting documented an evaluation of the mechanism's effectiveness based on a participant survey, which found that 98% of respondents were aware of its existence. The June 2024 meeting included discussions on the types of grievances submitted in the first half of 2024, confirming active use of the |

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| | | | mechanism. Additionally, a newsletter (Anglo American, 2024) describes the distribution of grievance posters during a community safety training in May 2024, attended by representatives from Adare Farm, Peak Farm, Dzikamidzi, Chironde, and Makwikwi.<br><br>Interviews with stakeholders, including workers and residents of affected areas, indicate general awareness of the grievance mechanism. Some interviewees noted challenges with follow-up on grievances raised through their representatives in the Community Engagement Forum, which they attributed to the resolution process rather than to access to the grievance mechanism itself.<br><br>The evidence, supported by interviews, indicates that the company's operational-level grievance mechanism is accessible to stakeholders, including affected community members, and that multiple channels are available for raising concerns related to the company's mining activities and those of its contractors. |
| 1.4.2.1. | The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:<br><br>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- | ◕ | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024); grievance posters in English and Shona; the Grievance Mechanism Awareness Tracker; Social Way refresher induction materials; the Community Engagement Forum (CEF) Terms of Reference; CEF meeting minutes; records of a Grievance Appeal Panel workshop; Grievance Appeal Panel appointment letters; and the grievance register. The evidence indicates that the grievance mechanism:<br><br>a. Is substantially aligned with the effectiveness criteria (a)–(h) outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights. The Grievance Procedure describes governance arrangements, defined process steps, indicative |

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| | compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue;<br><br>b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase;<br><br>c. How confidentiality of a complainant's identity will be respected, if requested;<br><br>d. The ability to file anonymous complaints, if deemed necessary by stakeholders;<br><br>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;<br><br>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<br><br>g. How complaints and grievances and their resolutions will be tracked and recorded. | | timeframes, confidentiality provisions, and investigation protocols, supporting predictability and transparency. The Community Engagement Forum (CEF) Terms of Reference outline the forum's approach to dialogue-based resolution, confidentiality, and the parties' ability to seek alternative mechanisms if not satisfied. The Grievance Appeal Panel structure, which includes external members from district government departments, aligns with legitimacy and rights-compatibility expectations.<br><br>b. Establishes how complaints are filed, acknowledged, investigated, and resolved, as indicated by the Grievance Procedure, which sets out multiple submission channels (e-mail, phone, written, in person, suggestion boxes, and third parties), describes logging, acknowledgment, investigation, closure steps, and provides indicative timeframes for each phase.<br><br>c. Establishes how confidentiality of a complainant's identity will be respected if requested, as indicated in the Grievance Procedure;<br><br>d. Has the ability to file anonymous complaints, if deemed necessary by stakeholders, through mailboxes or suggestion boxes, as indicated in the Grievance Procedure;<br><br>e. Includes provision of assistance for those who may face barriers to using the operational-level grievance mechanism, such as having grievance posters in local languages, awareness materials distributed through community meetings, clinics, and business centres, and internal sessions with employees and contractors to support general accessibility;<br><br>f. States that, if complainants are not satisfied with the remediation actions that have been implemented, the company guarantees it will not impede their right to seek recourse through other available |

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| | | | mechanisms, as the CEF Terms of Reference and Grievance Appeal Panel documentation describe an appeals process in which grievance outcomes may be reviewed by a panel composed of company representatives and external officials; and<br><br>g. Establishes how complaints and grievances are filed and tracked, as the Grievance Procedure requires registration of grievances in a grievance register, and documentation reviewed indicates that complaints and outcomes are recorded and monitored.<br><br>Interviews with a sample of workers and community members indicate that stakeholders were consulted on the design and communication of the grievance mechanism and were aware of available channels, including anonymous reporting and appeals.<br><br>The evidence, supported by interviews, indicates that the company has consulted stakeholders on the design and revision of its grievance mechanism and has established procedures and structures that substantially address sub-requirements (a) through (g).<br><br>The evidence does not include details to confirm full alignment with the effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, specifically regarding the continuous improvement of the company's social performance and the mechanism based on grievance information (a). |
| 1.4.2.2. | The operating company shall ensure that all complaints and grievance | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which documents the site-level process for receiving, logging, acknowledging, investigating, and closing issues, grievances, and incidents with social consequences, and |

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| | procedures are documented and made publicly available. | | states that the procedure is to be made available to internal stakeholders and displayed on noticeboards. A public “Reporting a Grievance or an Incident with a Social Consequence” poster (Valterra Platinum, July 2025) summarises the procedure, defines incidents and grievances, lists the information to be provided by complainants, and presents multiple reporting channels (e-mail, phone, hotline, letters, in-person, and anonymous reporting via suggestion boxes and third parties). Minutes from a Community Engagement Forum meeting (Anglo American, June 2023) record that the revised grievance procedure and reporting channels (including hotlines, WhatsApp groups, and suggestion boxes) were presented and discussed with community representatives, indicating that information about the procedure has been shared in a community forum.<br><br>On-site observations indicate that the company has posted information on how to access the grievance channel in areas around the mine site. Interviews with a sample of stakeholders, including workers and residents of affected areas, indicate that most of them are aware of how to file grievances.<br><br>The evidence indicates that the site-level grievance procedures are formally documented and that summaries of these procedures are made publicly available through posters, noticeboards, and community forums. |
| 1.4.3.1. | No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint | | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which describes how complaints are received, recorded, investigated, and closed. The procedure indicates that stakeholders may seek recourse through |

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| | through other available mechanisms, including administrative, non-judicial or judicial remedies. | | mechanisms outside the site-level process, including state-based mechanisms.<br>Interviews with company staff indicate that stakeholders who are dissatisfied with the outcome of the initial process may submit a follow-up complaint.<br>The evidence, including interviews, indicates that the Grievance Procedure references the option for aggrieved parties to seek recourse through mechanisms outside the site-level process.<br>The evidence does not include provisions or records that explicitly confirm that remedies agreed through the operational-level grievance mechanism do not require aggrieved parties to waive their right to seek recourse through administrative, non-judicial, or judicial mechanisms for the same complaint. |
| 1.4.4.1. | Complaints and grievances and their outcomes and remedies shall be documented. | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which requires that all issues and grievances with social consequences be logged in a grievance register, monitored, and closed with documented actions and outcomes. Additional evidence reviewed includes a Grievance Register for Q1–Q3 2025 (Unki Mine, 2025), which includes tabulated entries for each grievance, recording the date received, complainant or source (where applicable), issue description, grievance category, severity rating, responsible department, corrective or remedial actions, status, and closure date. The register also includes summary charts of grievances by type and status, indicating that complaints and their outcomes are systematically recorded. A document titled "Issues and Grievance Register" extract covering 2023 and 2024 contains similar structured records for the |

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| | | | preceding period, indicating continuity in grievance documentation practices. Supporting documentation also includes an investigation register for a Tailings Storage Facility and an open-pit concern, recording investigation dates, participants, and follow-up actions linked to reported issues.<br><br>Interviews with community members indicate that complaints raised during community meetings are tracked and followed up through subsequent dialogue. Stakeholders also reported that grievances submitted through external commissions are investigated and that the company engages in follow-up actions.<br><br>The evidence, supported by interviews, indicates that complaints and grievances, including associated investigation steps, outcomes, and, where applicable, remedies, are documented in structured registers and maintained in individual case files. |
| 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:<br><br>a. If changes need to be made to improve its effectiveness as per 1.4.2.1.a;<br><br>b. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and<br><br>c. If outcomes and remedies provided through the mechanism accord with | ◕ | The evidence reviewed indicates that the company undertakes activities to monitor and evaluate the performance of its operational-level grievance mechanism over time, as follows:<br><br>a. Identify areas for improvement and indicate periodic review of the mechanism, as the IGMP Evaluation Form – Grievance Mechanism (Unki Mine/Anglo American, no date), Social Performance Management Committee (SPMC) Monthly Meeting Minutes (Unki Mine/Anglo American, 2024), the Unki Mine Perception Survey – Doorstep Communities (LID Agency, 2023; updated 2024), and the Village Stakeholder Engagement and Perception Survey relating to the TSF (Unki Mine/LID Agency, September 2024) assess aspects such as accessibility, legitimacy, grievance trends, and stakeholder perceptions; |

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| | internationally recognized human rights. | | b. Use of grievance information to inform changes in company activities, as the Localised Failure Investigation (Report – Gravel Hauling (Unki Mine/Anglo American, April 2025) records engagements with the Dzikamidzi community regarding the open pit bulk sampling project and access roads (Unki, 2022), and records of Community Engagement Forum Q1 2025 meeting minutes (Unki Mine, 26 March 2025) document investigations, root-cause analyses, corrective and preventive actions, and follow-up measures intended to avoid recurrence of similar grievances; and<br><br>c. Review outcomes and remedies, as the documentation reviewed describes investigations, corrective actions, and engagement with affected stakeholders.<br><br>Interviews with key staff indicate that the company monitors the grievance mechanism and takes steps to review its effectiveness.<br><br>The evidence, supported by interviews, indicates that the company monitors and evaluates the performance of its operational-level grievance mechanism and uses findings to improve its effectiveness and to inform changes in company activities, consistent with sub-requirements (a-b).<br><br>The evidence does not include details to confirm that:<br><br>c. outcomes and remedies provided through the grievance mechanism are systematically reviewed to determine alignment with internationally recognised human rights. |
| 1.4.4.3. | Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of | ◕ | The evidence reviewed includes a stakeholder evaluation form titled Evaluation of the Issues and Grievance Process by the Community Engagement Forum (CEF), Community Engagement Committee |

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| | the complaints and grievance mechanism. | | (CEC), Community Engagement Reference Panel (CERP) and Other Stakeholders (Unki Mines/Anglo American, December 2023). The form was applied in a workshop with community and institutional representatives to assess aspects of the grievance mechanism, including accessibility, responsiveness, and communication. The form includes ratings and written comments, and the workshop agenda indicates that participants were invited to provide feedback on how the mechanism operates. A Grievance Evaluation Action Tracker (Unki Mines, 2023) compiles issues and suggestions raised during the session and records follow-up actions and responsible persons. Additional evidence includes the Unki Mine Perception Survey – Doorstep Communities (LID Agency, 2023 updated in 2024) and the Village 6 Stakeholder Engagement and Perception Survey relating to the TSF (Unki Mines/LID Agency, September 2024). These surveys included questions on awareness, use, perceived fairness, and effectiveness of the grievance mechanism and were administered to residents of nearby communities. CEF Q1 2025 meeting minutes (Unki, March 2025) record that survey results and grievance-related issues were presented and discussed with CEF members, who were invited to comment and propose adjustments.<br><br>Interviews with a sample of community members and government officials indicate that stakeholders understand these workshops, surveys, and forum discussions as opportunities to provide feedback on the performance of the grievance mechanism and that they are able to express their views. Some community members indicated concerns regarding the effectiveness of representation within the CEF and the timeliness of company responses, noting that CEF meetings are held quarterly. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | The evidence indicates that some stakeholders are provided with opportunities to submit feedback on the performance of the complaints and grievance mechanism through evaluation workshops, perception surveys, and multi-stakeholder forums.<br><br>The evidence, supported by interviews, does not indicate how these feedback opportunities are systematically, clearly and proactively communicated to all potentially affected stakeholders beyond those participating in structured forums and surveys. |
| 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. | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which defines who may access the mechanism, the types of issues covered, and the steps for lodging, acknowledging, investigating, and closing complaints. Grievance posters (Unki Mine/Valterra Platinum, 2024–2025), intended for display at the site and within nearby communities, are produced in English and Shona, and summarise the mechanism and list available reporting channels. A Grievance Mechanism Awareness Tracker (Unki Mines/Valterra Platinum, 2025) records awareness sessions conducted with internal and external stakeholder groups, including the Community Engagement Forum, Community Engagement Committee, Community Engagement Reference Panel, workers, and contractors. Supporting evidence includes the Unki Social Performance induction and refresher training materials (Unki, 2024–2025), including induction slides and the 2025 refresher status register, which include information on the grievance mechanism and were presented to both workers and contractors.<br><br>Interviews with community members, employees, and contractor workers (including women and other potentially marginalised groups) indicate awareness of the mechanism, including where and |

| Req # | Requirement | Score | Basis for Rating |
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| | | | how to submit grievances, the types of issues covered, and the basic procedural steps.<br>The evidence, supported by interviews, indicates that the company has documented procedures and conducted outreach activities to inform internal and external stakeholders about the existence, scope, and procedures of the grievance mechanism. |
| 1.4.5.2. | The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies. | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which states, in the section describing the appeals process, that the site-level grievance mechanism does not restrict stakeholders' right to seek a remedy through state-based judicial or other non-judicial mechanisms. Sample grievance acknowledgement and feedback letters issued to community members (Mashavave, Nyamukapa and S. Mudzingwa, August 2023 and February 2025) inform complainants that they may appeal within the site-level process and, if dissatisfied with the outcome, may seek remedy through other appropriate mechanisms. No evidence was identified indicating that participation in the operational-level grievance mechanism limits access to administrative, judicial, or other non-judicial remedies.<br>Interviews with key staff, community members, and a sample of complainants indicate that this message is communicated in practice and that stakeholders have not been discouraged from using administrative, judicial, or other non-judicial avenues.<br>The evidence, supported by interviews, indicates that the company neither states nor implies that participation in the grievance mechanism precludes stakeholders from seeking redress through administrative, judicial, or other non-judicial remedies. |

| Req # | Requirement | Score | Basis for Rating |
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| 1.4.5.3. | The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances, and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous. | ● | The evidence reviewed includes the Unki Social Performance Induction – Engage (Unki, 2024), which provides an overview of the site grievance mechanism and outlines the steps to follow for reporting, receiving, recording, and managing grievances, including the required documentation. Additional evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which assigns responsibilities to personnel handling grievances and requires fair treatment of complainants and protection against victimisation or retaliation. Supporting evidence includes a 2025 Social Performance Refresher Induction Status Sheet (Unki, 2025), which indicates that employees and contractors participate in periodic refresher training on these topics, and a Grievance Mechanism Awareness Tracker (Unki/Valterra Platinum, 2025), which records awareness sessions conducted with internal departments and contractors regarding the use of the grievance mechanism and associated procedures.<br><br>Interviews with key staff, including front-line staff and personnel directly involved in the grievance mechanism, indicate that they have received instruction on the procedures for handling stakeholder complaints and grievances, and that complaints, including those perceived as minor or frivolous, are expected to be handled respectfully in practice.<br><br>The evidence, supported by interviews, indicates that the company informs relevant personnel who interact with stakeholders about procedures for handling complaints and grievances and provides induction and refresher training to personnel directly involved in the operational-level grievance mechanism. |

| Req # | Requirement | Score | Basis for Rating |
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| 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. | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which states that the results of grievance monitoring and evaluation will be summarised and shared with internal stakeholders through the Social Performance Management Committee (SPMC) and with external stakeholders through the Community Engagement Forum (CEF), in aggregate form and without disclosing complainants' identities. Additional evidence includes SPMC Monthly Meeting Minutes (Unki Mines, May 2024), which present a social performance dashboard with grievance indicators and trend data, and Community Engagement Forum Minutes for Q1 2025 (Unki, March 2025), which record presentations to community representatives on grievance statistics, categories, and management responses. These minutes reflect reporting at an aggregated level rather than disclosure of individual complainant details. Grievance registers and incident logs (Unki IGM Register, October 2024; Q1–Q3 2025 Grievance Registers) indicate that grievances are recorded using reference numbers, categories, and summaries of management responses, without publication of personal data.<br><br>Interviews with key staff, a sample of community representatives, and workers and contractors indicate that grievance information is reported periodically in practice and that reporting respects complainants' confidentiality and safety.<br><br>The evidence, supported by interviews, indicates that the company periodically reports to internal and external stakeholders on grievances received and responses provided, using aggregated and anonymised information to protect the confidentiality and safety of those filing grievances. |

# Chapter 1.5—Revenue and Payments Transparency

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 95% |
| Chapter Score Basis | 22 out of 24 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 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.<br><br>(Note: for the purposes of self-assessment, the respondent should only consider for question 1.5.1.1 whether the EU or an equivalent mandatory transparency regime is relevant (either because a company is legally required to comply or because the company voluntarily chooses to meet the EU or equivalent country requirements). If EU or an equivalent mandatory transparency regime is not relevant, then the respondent should mark 1.5.1.1 | — | Not relevant. The mine is operated by Unki Mines (Private) Limited ("Unki Mines"), which has been wholly owned by Valterra Platinum Limited ("Valterra Platinum") since May 2025, following the demerger and rebranding of Anglo American Platinum into Valterra Platinum. Anglo American Platinum, prior to this transition, had been the previous owner of Unki Mines. Unki Mines is registered in Zimbabwe and is therefore required to submit annual financial statements to the Zimbabwean government in accordance with International Financial Reporting Standards (IFRS).<br><br>The evidence reviewed, along with interviews with key staff, confirms that neither Unki Mines nor Valterra Platinum is subject to reporting requirements under the EU Directives or any equivalent mandatory transparency regime, nor have they voluntarily opted to report under such frameworks. |

| Req # | Requirement | Score | Basis for Rating |
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| | as not relevant and move to 1.5.1.2 below.) | | |
| 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.<br><br>(Note: for the purposes of self-assessment, if 1.5.1.1 is relevant then the respondent should mark both 1.5.1.2 and 1.5.1.3 as not relevant.) | ● | The mine is operated by Unki Mines, which has been wholly owned by Valterra Platinum since May 2025, following the demerger and rebranding of Anglo American Platinum into Valterra Platinum. Anglo American Platinum, prior to this transition, was a subsidiary of Anglo American plc and had previously owned Unki Mines.<br><br>The evidence reviewed includes Financial Statements for the years ending 2023 and 2024 (Unki Mines, October 2024 and April 2025), prepared as per local reporting requirements in Zimbabwe; and the Audited Annual Financial Statements for 2023 and 2024 (Anglo American Platinum, 2024 and 2025), prepared in compliance with requirements in South Africa, where Anglo American Platinum was registered at the time of reporting.<br><br>Additional evidence includes the Payments to Government Reports and Tax and Economic Contribution Reports for 2023 and 2024 (Anglo American plc, 2024 and 2025). All of the reviewed reports conform to the International Financial Reporting Standards (IFRS), disclose material payments made to the government of Zimbabwe, and were published within 12 months after the end of the corresponding financial year. Anglo American and Anglo American Platinum's reports are accessible through the corporate website (https://www.angloamerican.com/investors/annual-reporting/reports-library). Their publishing dates on the website confirm that all of them were published within a year following the reporting period. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | The evidence indicates that, for the period prior to the 2025 demerger, Unki Mines, Anglo American Platinum at the corporate level, and Anglo American plc as the parent company each published annual reports disclosing material payments made to the Government of Zimbabwe, and that these reports were made publicly available within 12 months after the end of each financial year. |
| 1.5.1.3. | The types of payment disclosed shall include as a minimum, as applicable:<br>a. The host government's production entitlement;<br>b. National state-owned enterprise production entitlement;<br>c. Profits taxes;<br>d. Royalties;<br>e. Dividends;<br>f. Bonuses, such as signature, discovery and production bonuses;<br>g. Licence fees, rental fees, entry fees and other considerations for licences and/or concessions;<br>h. Payments for infrastructure improvements; and | ● | The evidence reviewed includes the Tax and Economic Contribution Reports for 2023 and 2024 (Anglo American plc, 2024-2025) and Integrated Reports for 2023 and 2024 (Anglo American Platinum, 2024-2025), which disclose the following types of payments made in Zimbabwe:<br>a. The host government's production entitlement, under the category Royalties and mining taxes;<br>b  National state-owned enterprise production entitlement, under the categories: Other Payments Borne or Other Payments;<br>c. Profits taxes, under the category Corporate income tax;<br>d. Royalties, under the category Royalties and mining taxes;<br>g. License fees, rental fees, entry fees, and other considerations for licenses and/or concessions, under the category Other payments borne;<br>h. Payments for infrastructure improvements, under the category Capital expenditure; and |

| Req # | Requirement | Score | Basis for Rating |
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| | i. Any other significant payments and material benefits to government, including in kind payments. | | i. Any other significant payments and material benefits to the government, under the category Community and Social Investment.<br><br>Further evidence includes the Annual Financial Reports for 2023 and 2024 (Unki Mine, 2024-2025) which disclose:<br><br>e. Dividends, within the Statement of Cash Flows and the Statement of Changes in Equity in Unki Mine's Financial Reports;<br><br>and the Audited Annual Financial Statements for 2024 (Anglo American Platinum, 2025), which disclose:<br><br>e. Dividends, under the category "payment of the dividend to external shareholders"; and<br><br>f. Bonuses, in Annexure A and Annexure D.<br><br>In addition, the Payments to Government Reports for the years 2023 and 2024 (Anglo American, 2024-2025) also disclose payments of fees (g), royalties (d), and taxes (c) to entities of the Government of Zimbabwe.<br><br>Interviews with management confirm that the company discloses the required payments under categories (a), (b), (g), (h), and (i), as well as those reported in the financial statements under categories (e) and (f).<br><br>The evidence, supported by interviews, indicates that the company reports the types of payments required under sub-requirements (a) through (i). |
| 1.5.1.4. | At minimum, this information shall be broken down by recipient government | ● | The evidence reviewed includes the Payments to Governments Reports (Anglo American plc, 2023 and 2024), which include tables |

| Req # | Requirement | Score | Basis for Rating |
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| | body (where applicable), by project (where applicable), and by payment type. | | of annual payments, categorized by Country, Government Agency, Payment Type (e.g., taxes, royalties), Project Code, Project Name, Currency, and Amount.<br>Interviews with key staff confirmed that Unki Mines was the only project in Zimbabwe during the reporting periods.<br>The evidence, supported by interviews, indicates that payments to the Government of Zimbabwe are broken down by type, project, and the government agency receiving them. |
| 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.<br>(Note: for the purposes of self-assessment, the respondent should only answer question 1.5.2.1 if the EU or an equivalent mandatory transparency regime is relevant (either because a company is legally required to comply or because the company voluntarily chooses to meet EU or equivalent country requirements). If question 1.5.2.1 is not relevant, move to 1.5.2.2 below.) | — | Not relevant. Neither Unki Mines nor Valterra Platinum is subject to reporting requirements under the EU Directives (see 1.5.1.1). |

| Req # | Requirement | Score | Basis for Rating |
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| 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:<br>a. Mine production, disaggregated by product type and volume;<br>b. Revenues from sales, disaggregated by product type;<br>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);<br>d. Social expenditures, including the names and functions of beneficiaries;<br>e. Taxes, tariffs or other relevant payments related to transportation of minerals;<br>f. Payments to politicians' campaigns, political parties or related organizations; and | ◐ | The evidence reviewed includes semester and annual Reports on Operational Statistics (Valterra Platinum, 2024 and 2025 H1; accessible at: https://www.valterraplatinum.com/investors/financial-results-centre); Tax and Economic Contribution Reports (Anglo American, 2023 and 2024), and Payments to Governments Reports (Anglo American, 2023 and 2024; accessible at: https://www.angloamerican.com/investors/annual-reporting/reports-library).<br>Additional evidence includes the Code of Conduct (Valterra Platinum, 2025).<br>The evidence indicates that the company publicly reports material payments annually, as detailed below:<br>a. Mine production, disaggregated by product type and volume, is reported through the 2024 and 2025 H1 Reports on Operational Statistics.<br>b. Revenues from sales, disaggregated by product type, are also included in these Operational Statistics Reports.<br>c. Material payments and other material benefits to government, broken down by receiving entity, are reported through Anglo American plc's Payments to Governments and Tax and Economic Contribution Reports for 2023 and 2024, and further substantiated in Anglo American Platinum's 2023–2024 Integrated Reports.<br>d. Social expenditures are disclosed publicly as aggregate community and social investment figures in the Tax and Economic Contribution Reports. Internal records confirm that donations and their beneficiaries are tracked, although beneficiary names and functions are not publicly reported. |

| Req # | Requirement | Score | Basis for Rating |
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| | g. Fines or other similar penalties that have been issued in relation to the project.<br>(Note: for the purposes of self-assessment, if 1.5.2.1 is relevant then the respondent should mark 1.5.2.2 as not relevant.) | | e. Taxes, tariffs, or other payments related to the transportation of minerals are not publicly disclosed in any of the available reports.<br>f. Payments to political campaigns, political parties, or related organizations are explicitly prohibited by the company's Code of Conduct, and interviews confirm that no such payments are made.<br>Interviews with key staff indicate that no payments to individuals such as politicians' campaigns, political parties, or related organizations are made (f), and that fines would be disclosed in the public reports, if issued (g).<br>The evidence, supported by interviews, indicates that the company publicly reports the information required under sub-requirements (a) through (c), and partially under (d), and that it makes no political contributions as outlined in (f).<br>The evidence does not include information to confirm that the company publicly discloses, in a manner readily accessible to the general public, the names and functions of beneficiaries of social expenditures under (d), nor does it disclose transportation-related taxes or tariffs (e), or fines and penalties (g), if relevant. |
| 1.5.2.3. | The operating company shall publish annual accounts, following international accounting standards. | ● | Unki Mines is a privately owned company in Zimbabwe. As such, it is obligated to present annual financial statements to the government, but not to publish them. Since Unki Mine is a subsidiary of Anglo Platinum, its financial information is included within the Anglo Platinum Group Annual Financial Statements.<br>The evidence reviewed includes the Audited Annual Financial Statements for the years ended 2023 and 2024 (Anglo American Platinum, 2024-2025), which are prepared in accordance with |

| Req # | Requirement | Score | Basis for Rating |
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| | | | International Financial Reporting Standards (IFRS) and the requirements of the Companies Act of South Africa, where the company was based. This is supported by the independent auditor's reports signed by representatives of PricewaterhouseCoopers Inc. (Johannesburg, South Africa). The Financial Statements are published annually and available at the following link: https://www.angloamerican.com/investors/annual-reporting/reports-library.<br><br>The evidence indicates that the company, at the group level (Anglo American Platinum), publishes annual accounts in accordance with international accounting standards (IFRS). |
| 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. | ● | The evidence reviewed includes the Sustainability Reports (Anglo American Platinum, 2023-2024), which include statements endorsing EITI. These reports are published on the website at: https://www.valterraplatinum.com/investors/reports-archive. |
| 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:<br><br>a. Commit to engage constructively with and support implementation of the EITI consistent with the multi- | ◐ | The evidence reviewed includes the 2023 and 2024 Sustainability Reports (Anglo American Platinum, 2024–2025), which confirm that, as the owner of Unki Mines during the reporting period, Anglo American Platinum publicly expressed support for the EITI initiative, consistent with the multi-stakeholder process. A review of the Code of Conduct (Valterra Platinum, June 2025), which is publicly available on the company's website, confirms continued support of the EITI initiative at the ownership level of Unki Mines. However, EITI |

| Req # | Requirement | Score | Basis for Rating |
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| | stakeholder process adopted in its country of operation; and<br><br>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. | | is not implemented in Zimbabwe, and therefore country-level EITI reporting mechanisms do not exist.<br><br>Additional evidence from the 2023 and 2024 Tax and Economic Contribution Reports (Anglo American plc, 2024–2025) demonstrates a corporate commitment to engage constructively with the EITI.<br><br>The evidence indicates that at the corporate level, the company supports the EITI initiative meeting the expectations of sub-requirement (a).<br><br>The evidence does not include links on the company's external website to completed and up-to-date EITI Company Forms, as required under sub-requirement (b). |
| 1.5.4.1. | The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in the national language(s) of the country in which the mining project is located.<br><br>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. | ● | The evidence reviewed includes an excerpt from the Zimbabwean Government Gazette (March 28, 2008), which includes a notice on the Application for Special Mining Lease for Unki Mines and a description of the lease area. A Declaration of Holders of Special Mining Lease as Approved Holders, published in the Gazette on February 12, 2010, indicates publication that the Unki company has been granted a special mining lease.<br><br>The evidence indicates that sub-requirement (a) does not apply; and that the material terms for mineral exploration, development, and production for the operating company are governed by law, and were published through official channels in English, which is one (1) of the country's official languages (b). |

| Req # | Requirement | Score | Basis for Rating |
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| | b. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement. | | |
| 1.5.4.2. | The beneficial ownership of the operating company shall be publicly accessible. | ● | The evidence reviewed includes Anglo American Platinum's Annual Integrated Report for 2024, which presents the beneficial ownership of the Unki Mines operating company for the period prior to the 2025 demerger. Additional evidence from Anglo American Platinum's Annual Financial Statements for 2024 indicates that, during the 2024 reporting period, the only shareholder holding 5% or more of the shares was Anglo American Platinum, with a reported ownership of 66.71%. These reports are publicly accessible via the Valterra Platinum reports archive (https://www.valterraplatinum.com/investors/reports-archive).<br>The evidence therefore confirms that the beneficial ownership of the operating company was publicly accessible at the time of reporting.<br>This requirement will be reviewed in the next audit to confirm that beneficial ownership disclosures have been updated to reflect Valterra Platinum as the owner starting May 2025. |
| 1.5.5.1. | Critical. The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors. | ● | The evidence reviewed includes the Conducting Business with Integrity Policy (Valterra Platinum, June 2025), the Code of Conduct (Valterra Platinum, June 2025), and the Responsible Sourcing Standard (Valterra Platinum, June 2025). These instruments outline the company's commitment to ethical and transparent business |

| Req # | Requirement | Score | Basis for Rating |
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| | | | practices, explicitly prohibit bribery and all other forms of corruption, and document the company's implementation of risk-based compliance programs to effectively identify and mitigate related risks.<br><br>Implementation is supported by training records, including the 2023 Doing Business with Integrity training (Anglo American, September to November 2023) and the 2024 Code of Conduct training (Anglo American, September to October 2024), completed by 81 and 296 employees, respectively.<br><br>The Responsible Sourcing Standard for Suppliers (Valterra Platinum, June 2025) includes anti-bribery and corruption controls and sanctions embedded in the supplier management process. Implementation of this standard is supported by a Supplier Guideline to Complete a Responsible Sourcing Self-Assessment Questionnaire (Anglo American, 2023), an attendance list from a corresponding meeting involving contractors (Anglo American, September 2024), and an Excel datasheet including the results of the Self-Assessment for Responsible Sourcing (Anglo American, 2024), which documents the completion of the assessment by over 50 contractors based in Zimbabwe.<br><br>Interviews with relevant workers and contractors confirm their awareness of the policies and procedures that prohibit bribery and other forms of corruption.<br><br>The evidence, supported by interviews, indicates that the company has developed and documented policies and standards prohibiting bribery and other forms of corruption, and implements these requirements across the organization through actions such as |

| Req # | Requirement | Score | Basis for Rating |
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| | | | training for employees and contractors, as well as compliance assessments for suppliers. |
| 1.5.5.2. | Procedures shall include:<br><br>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<br><br>b. Disciplinary actions to be taken if cases of bribery or corruption are discovered. | ● | The evidence reviewed includes the Code of Conduct (CoC) (Valterra Platinum, 2025), which applies to all employees of Valterra Platinum, including Unki Mines. This CoC establishes procedures for addressing breaches, including mechanisms for reporting and recording incidents. Section 4 of the CoC addresses misconduct and reporting requirements related to business integrity, such as bribes, corruption, and other undue influence and is further supported by the company's policy on Conducting Business with Integrity (Valterra Platinum, 2025). The commission of any business irregularity (e.g., fraud, bribery, theft in all forms, money laundering, receiving/giving gifts and favours, and others) is subject to dismissal and, where appropriate, reimbursement of costs to the company as recommended penalties.<br><br>Additional evidence includes the Disciplinary & Grievance Handling Procedure (Valterra Platinum, July 2025), which establishes disciplinary actions (warnings or dismissal) for breaches with the company's CoC. In addition, the company has a whistleblower platform accessible through the link: https://www.valterraplatinum.com/suppliers.<br><br>Interviews with relevant staff confirm that the company has an established anti-bribery process. Staff receive regular training on this subject, and business partners are subject to the same standards and requirements as employees. No known cases involving undue pecuniary advantage were identified. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | The evidence, supported by interviews, indicates that the company fully meets sub-requirements (a) and (b). |
| 1.5.5.3. | Relevant employees and contractors shall be trained in the application of the operating company’s policy and procedures. | ● | The evidence reviewed includes a dataset containing more than 4,000 records of training for permanent employees and contractors between 2016 and 2025. These records cover training on the company’s Code of Conduct, including earlier versions (Code of Conduct, AMZIM Holdings, 2016; Our Code of Conduct, Anglo American, 2022) and the current version (Code of Conduct, Valterra Platinum, 2025), all of which address ethical conduct, including anti-bribery and anti-corruption. Additional evidence includes training records for Unki Mine personnel on related policies, such as Anglo American’s Doing Business with Integrity Policy delivered in 2023 (74 records). For contractors, the evidence includes records of training for approximately 100 contractor personnel on the company’s Responsible Sourcing Policy conducted in 2024.<br><br>Interviews with employees and contractors confirm their familiarity with the company’s related policies and procedures.<br><br>The evidence, supported by interviews, indicates that employees and contractors receive training on the company’s policies and procedures related to anti-bribery, anti-corruption, and ethical conduct. |

# Principle 2: Planning for Positive Legacies

## Chapter 2.1—Environmental and Social Impact Assessment and Management

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 88% |
| Chapter Score Basis | 28 out of 32 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 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. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 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. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |

| Req # | Requirement | Score | Basis for Rating |
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| 2.1.1.3. | The ESIA shall be carried out in accordance with publicly available, documented procedures. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 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. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 2.1.2.2. | Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:<br>a. A general description of the proposed project, including details on the proposed location, and nature and | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |

| Req # | Requirement | Score | Basis for Rating |
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| | duration of the project and related activities;<br>b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts;<br>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<br>d. Contact details for the person or team responsible for management of the ESIA. | | |
| 2.1.3.1. | Critical. (See NEW MINES VS EXISTING MINES below)<br>(NEW MINES) The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.<br>(EXISTING MINES) The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental | ● | The Unki mine is an existing mine with expansions in progress. The evidence reviewed includes an initial Environmental Impact Assessment (EIA) (Scott Wilson, 2003) for the mine operation. Since then, the company has conducted additional EIAs for project expansions and additions to identify potential impacts, as documented in:<br>- EIA for a Housing Development near Shurugwi Town (Black Crystal Consulting, 2008), which assessed impacts on soils and erosion, vegetation and biodiversity, surface and groundwater quality, air and noise pollution, waste management, public health and safety, infrastructure and service demand, and cultural heritage. |

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| | and social impacts associated with the mining operation. | | - EIA for an Overhead Power Supply Line (Mkola Investments, 2013), which assessed potential impacts on vegetation, wildlife, and hydrology.<br><br>- EIA for a Smelter (Ascon Africa, 2016), which assessed impacts on visual aesthetics/landscape, soils, surface and groundwater quality, air quality, flora and fauna, and noise and vibration.<br><br>- EIA Addendum for the Pollution Control Dam Expansion Project (Black Crystal Consulting, 2020), which assessed impacts on soils, hydrology, groundwater and surface-water quality, vegetation, fauna, and local socio-economic conditions, with specific emphasis on seepage and overflow risks, erosion, waste and effluent management, and community health and safety during both construction and operation.<br><br>- EIA for a Waste Incinerator Project (Black Crystal Consulting, 2020), which assessed impacts on air, soil, water and biodiversity.<br><br>- Environmental Prospectus & Environmental Management Plan for the Unki South Bulk Sample Collection (Black Crystal, September 2021), which assessed potential environmental and stakeholder impacts associated with accessing, blasting, and excavating a test pit.<br><br>- Environmental and Social Impact Assessment for the Solar PV Facility at Unki Mine (SLR Consulting, 2023), which assessed potential impacts on landscape, vegetation, biodiversity, hydrology, soil, air quality, and socio-economic conditions arising from the development of the renewable-energy installation.<br><br>On-site observations as well as interviews with external stakeholders, including governmental authorities and communities, |

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| | | | as well as company staff, indicate that potential environmental and social impacts are scoped prior to changes in mining operations. Community members reported that the company solicited their input during recent environmental and social impact assessment processes and that quarterly Community Engagement Forum meetings provide an ongoing platform to discuss potential and actual impacts.<br><br>The evidence, supported by observations and interviews, indicates that the company has undertaken evaluations to identify potential social and environmental impacts associated with the mine operation and its expansions. |
| 2.1.3.2. | During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as "stakeholders") who may be interested in and/or affected by the proposed project. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 2.1.3.3. | Scoping shall include the consideration of:<br><br>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; | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |

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| | b. Direct, indirect and cumulative impacts; and<br>c. Potential impacts of extreme events. | | |
| 2.1.3.4 | Scoping shall result in the identification of:<br>a. Potentially significant environmental and social impacts of the proposed project;<br>b. Alternative project designs to avoid significant adverse impacts;<br>c. Other actions to mitigate identified adverse impacts; and<br>d. Additional information and data needed to understand and assess the potential impacts. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 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. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |

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| 2.1.4.2. | Additional studies shall be carried out as necessary to fulfil the information needs of the ESIA. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 2.1.5.1 | The operating company shall:<br>a. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping;<br>b. Determine the significance of the predicted impacts;<br>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<br>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. | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 2.1.6.1. | The operating company shall prepare an ESIA report that includes, at minimum: | — | Not scored. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |

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| | a. A description of the proposed mining project;<br>b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts;<br>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;<br>d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and<br>e. Names and affiliations of ESIA authors and others involved in technical studies. | | |
| 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. | ● | The evidence reviewed includes the Safety, Health and Environment (SHE) Management Systems Manual (Anglo American, November 2024), which defines the company's framework for identifying, managing, and monitoring environmental and social risks and impacts in alignment with ISO 14001:2015, and incorporates mechanisms for continual improvement. Identified risks and corresponding management measures are documented in the |

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| | | | Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025) and the Environmental Aspects and Impacts Register (Unki Mines, 2025), which indicate that environmental and social risks are systematically identified, assessed, and managed, and that the effectiveness of management measures is periodically reviewed. A third-party assessment report (BSI, November 2024) confirms that the site maintains ISO 14001:2015 certification, indicating that a structured environmental management system is implemented and maintained. Additional evidence reviewed includes Environmental and Social Impact Assessment reports (see 2.1.3.1) and quarterly Environmental Management Plan and Monitoring Reports (Unki Mines, 2023, 2024, and Q1 2025), which document ongoing monitoring and management of environmental and social risks and impacts associated with existing operations as well as project expansions.<br><br>Interviews with staff across relevant departments confirm awareness of their roles and responsibilities in implementing and maintaining the environmental and social management system.<br><br>The evidence, supported by interviews, indicates that the company has developed and maintains a system to manage environmental and social risks and impacts throughout the life of the mine. |
| 2.1.7.2 | An environmental and social management plan (or its equivalent) shall be developed that, at minimum:<br><br>a. Outlines the specific mitigation actions that will be carried out to | ● | The evidence reviewed includes several Environmental and Social Management Plans (ESMPs) associated with corresponding Environmental and Social Impact Assessments (ESIA), such as the initial EIA (Scott Wilson, 2003), Overhead Power Supply Line EIA (Mkola Investments, 2014), Smelter EIA (Ascon Africa, 2016), Environmental Prospectus & Environmental Management Plan for |

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| | address significant environmental and social impacts identified during and subsequent to the ESIA process;<br>b. Assigns personnel responsible for implementation of various elements of the plan; and<br>c. Includes estimates for the resources needed to implement the plan. | | the Unki South Bulk Sample Collection (Black Crystal, September 2021), and ESIA for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023).<br>These ESMPs:<br>a. Outline the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process;<br>b. Assign personnel responsible for implementation of various elements of the plan; and,<br>c. Include estimates for the resources needed to implement the management plan associated with the Solar PV Facility.<br>Additional evidence includes the SHE Management System Manual (Anglo American, November 2024), which states that the site's management plans are designed to include appropriate actions, assign responsibilities for implementation, and estimate resources required.<br>Further evidence reviewed includes quarterly EMP and Monitoring Reports (Unki Mines, 2023, 2024, and Q1 2025), which document the implementation of the mitigation actions embedded in the ESMPs.<br>The evidence indicates that the company has developed ESMPs, that define mitigation measures (a) and assign responsible personnel (b). Additionally, the evidence indicates that adequate resources have been allocated for implementation, as evidenced by the effective execution of mitigation actions documented in the EMP and Monitoring Reports, and, in more recent plans, the inclusion of explicit resource estimates (c). |

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| 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. | ● | The evidence reviewed includes quarterly EMP and Monitoring Reports (Unki Mines, 2023, 2024, and Q1 2025), which document monitoring results and assess implementation of the company's EMP commitments. The documentation indicates that EMP monitoring and compliance information is updated quarterly based on monitoring results and that quarterly reports are submitted to the competent regulatory authorities. Additional evidence includes the Environmental and Social Management Plan (ESMP) for the Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which describes the ESMP as a living document that is intended to be updated as the project progresses, consistent with a continuous improvement approach. The ESMP outlines the project's environmental and social risk management strategy, including mitigation measures, impact management, and implementation mechanisms. Supplemental evidence includes the SHE Management System Manual (Anglo American, November 2024), which describes a formal management-of-change process designed to control planned and unplanned changes that could affect SHE performance, including changes arising from safety, health, and environmental impact assessments.<br><br>Interviews with relevant staff from environmental and social departments confirm that EMPs and ESMPs are implemented and maintained as dynamic documents, with revisions made based on monitoring results and other relevant information.<br><br>The evidence, supported by interviews, indicates that the company implements its environmental and social management plans and revises them, as necessary, based on monitoring results or other information. |

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| 2.1.8.1. | As part of the ESMS, the operating company shall establish a program to monitor:<br><br>a. The significant environmental and social impacts identified during or after the ESIA process; and<br><br>b. The effectiveness of mitigation measures implemented to address environmental and social impacts. | ● | The evidence reviewed includes the Safety, Health and Environment (SHE) Performance Measurement and Monitoring Procedure (UNK-MIN-SHE-PRO-0018, Anglo American, March 2010), which establishes the framework and requirements for monitoring environmental and social impacts. Additional evidence includes the Unki Complex Quarterly Environmental Management Plan (EMP) and Monitoring Reports for 2023 through 2025. These quarterly reports document EMP implementation, monitoring results, and compliance evaluations specific to each EMP (e.g., Solar PV Facility, Bulk Sample Collection).<br><br>Interviews with key staff confirmed the ongoing review of monitoring data and the evaluation of the effectiveness of environmental and social mitigation strategies.<br><br>The evidence, supported by interviews, indicates that the company has established programs to monitor:<br><br>a. The significant environmental and social impacts identified during or after the ESIA process; and<br><br>b. The effectiveness of mitigation measures implemented to address environmental and social impacts. |
| 2.1.8.2. | The monitoring program shall be designed and carried out by competent professionals. | ● | The evidence reviewed includes a set of ESIAs and their corresponding ESMPs (see 2.1.7.1), as well as descriptions of the professionals involved, indicating that management planning and monitoring were conducted by qualified professionals. Air quality monitoring is carried out by an EMA-approved and ISO-credentialed third-party, with experience in emissions, air quality, and environmental monitoring (Capability Statement, Toltecs Ltd, 2025), and water quality samples are analysed by a nationally accredited |

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| | | | laboratory (Schedules of Accreditation, GNK Laboratories, 2022–2025).<br><br>A set of CVs for key environmental and social staff (e.g., Environmental Coordinator, Operational Risk Coordinator), as well as third-party consultants who have undertaken the social and environmental studies and monitoring, documents relevant expertise in their respective fields.<br><br>Interviews with staff from various departments involved in the development and implementation of the environmental and social management plans, indicate they are competent to fulfil their responsibilities.<br><br>The evidence, supported by interviews, indicates that the site's social and environmental  monitoring programs were designed and carried out by competent professionals. It also indicates that competent personnel on environmental and risk management oversee the operations. |
| 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. | ● | The evidence reviewed includes minutes of Community Engagement Forum and Community Environment Committee meetings covering Q1 2023 to Q2 2025 and the Grievance Registers (Unki Mine, 2023–2025) and does not include any request for independent monitoring.<br><br>Interviews with company management indicate that the company has not yet received a request from stakeholders for independent monitoring of key impact indicators, but that they would facilitate independent monitoring, if such a request were made. Interviews |

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| | | | with a sample of stakeholders indicate that no requests for independent monitoring have been made.<br>The evidence indicates that no requests for independent monitoring have yet been made, and independent monitoring has not occurred. |
| 2.1.9.1. | (See NEW MINES VS EXISTING MINES below)<br>(NEW MINES) As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:<br>a. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3);<br>b. Methodologies for the collection of environmental and social baseline data (see 2.1.4);<br>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);<br>d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c); | ● | Unki is an existing mine. The evidence reviewed includes the EIA for a Smelter (Ascon Africa, 2016) near the community of Shurugwi, which documents public consultation meetings held on December 9 and 11, 2015. The documentation indicates that these meetings were attended by mine management, government regulators, interested stakeholders, and residents of Shurugwi Town and the Tongogara Rural District Council area. Additional evidence includes fourteen (14) completed questionnaires from government departments (Ascon Africa, October–December 2015), indicating consultation with relevant government agencies as part of the EIA process. More recent evidence includes documentation related to the Environmental Prospectus & Environmental Management Plan for the Unki South Bulk Sample Collection (Black Crystal, September 2021) and the ESIA for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which both include summaries of stakeholder engagement processes; records of communications and meetings with the Environmental Management Agency (August 2022 to April 2023); and non-technical summaries of the ESIA in both English and Shona. The summary reports document stakeholder mapping, regulatory engagement, stakeholder meetings, notification and disclosure of the Solar PV Draft ESIA Report, and the collection of stakeholder comments with corresponding company responses. |

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| | e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and<br><br>f. The final conclusions and recommendations of the ESIA (see 2.1.6.1).<br><br>(EXISTING MINES) As part of the ESIA process, the operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine. | | Interviews with a sample of affected community members indicated that most of them have been consulted during the ESIA process and that the company solicited their feedback and questions regarding potential environmental and social impacts.<br><br>The evidence, supported by interviews, indicates that, as part of the ESIA process, the company consulted a broad range of relevant stakeholders to identify and evaluate potential environmental and social impacts associated with the mine. |
| 2.1.9.2. | (See NEW MINES VS EXISTING MINES below)<br><br>(NEW MINES) The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process.<br><br>(EXISTING MINES) The operating company shall encourage and facilitate stakeholder participation, where possible, in the development of options | ● | Unki is an existing mine. The evidence reviewed includes the EIA for a Smelter (Ascon Africa, 2016), which documents the public consultation process undertaken as part of the EIA, describes engagement with residents of mining-affected communities and outlines the role of consultation in identifying potential impacts and informing mitigation measures. More recent evidence includes documentation related to the Environmental Prospectus & Environmental Management Plan for the Unki South Bulk Sample Collection (Black Crystal, September 2021) and the ESIA for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which both include summaries of stakeholder engagement processes; records of communications and meetings with the Environmental Management Agency (August 2022 to April 2023); and non-technical summaries of the ESIA in both English and Shona. The summary reports document stakeholder mapping, regulatory engagement, stakeholder meetings, notification and disclosure of |

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| | to mitigate the potential impacts of the project. | | the Solar PV Draft ESIA Report, and the collection of stakeholder comments with corresponding company responses, including input relevant to mitigation measures.<br><br>Interviews with a sample of affected community members and government officials indicate that stakeholders were engaged during ESIA and ESMS-related processes and had opportunities to provide input on monitoring activities and on the development of measures to mitigate potential environmental and social impacts, including during data collection and subsequent review stages.<br><br>The evidence, supported by interviews, indicates that the company encourages and facilitates stakeholder participation, where possible, in the development and refinement of options to mitigate potential project impacts. |
| 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. | | The evidence reviewed includes documentation on the function and activities of the Community Environmental Committee (CEC), including the CEC Terms of Reference (Anglo American, June 2023), and indicates that the CEC participates in environmental matters with potential community impacts, including review of air and water quality monitoring results, and assesses the effectiveness of environmental monitoring plans and related recommendations. Additional evidence includes Community Engagement Forum (CEF) meeting minutes (Q3 CEF Meeting, September 2024), which document discussions on mitigation measures proposed by stakeholders in response to unwanted events identified in a health impact assessment. The minutes indicate that stakeholder input contributed to identifying risks and developing mitigation strategies. The outcomes of these consultations informed updates to the Community Health and Safety Management Plan (Anglo |

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| | | | American, January 2025). The plan states that its objective includes maintaining a community-based, participatory, and transparent monitoring and evaluation program that identifies key community health and safety impacts, risks, mitigation strategies, and management actions.<br><br>Interviews with affected community members and other stakeholders indicate that formal engagement mechanisms are in place and that relevant information is generally shared during CEF sessions. Most interviewees expressed general satisfaction with the CEF process and noted improvements in communication in recent years. Some interviewees indicated that information shared during CEF meetings is not always consistently disseminated to the broader community, and that the quarterly frequency of meetings may limit timely input on certain issues.<br><br>The evidence, supported by interviews, indicates that the company has established formal mechanisms to facilitate stakeholder consultation and to provide opportunities for review and comment on environmental and social matters, including monitoring results and related mitigation measures.<br><br>The evidence does not indicate that stakeholders are systematically consulted in a timely and effective manner on the scope and design of the overall 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. | ◐ | The evidence reviewed includes the Community Environmental Committee (CEC) Terms of Reference (Anglo American, June 2023), which state that the environmental sub-committee participates in environmental matters that may affect the community, including review of air and water quality monitoring results and assessment |

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| | | | of the effectiveness of environmental monitoring plans and recommendations. Supporting evidence includes CEC meeting minutes from June 2023. The minutes indicate that the meetings were attended by representatives from mining operations, including environmental and safety personnel, CEC members, and other community participants. The documentation reflects that details of the active environmental monitoring program were presented and that community concerns were recorded. Additional evidence includes Community Engagement Forum (CEF) meeting minutes (Q4 2023 and Q2 2024), which document communication of air and water quality monitoring results, operational updates, key issues with assigned responsibilities, and findings from environmental impact and issue management processes informed by CEC self-assessment. A set of Participatory Monitoring Attendance Reports (Unki Mine, 2023-2025) and Air and Water Monitoring Schedules (Unki Mine, 2023-2025) confirms the implementation of a participatory air and water quality monitoring, with attendance of community representatives.<br><br>Interviews with a sample of affected stakeholders indicate that they were consulted regarding environmental monitoring activities and that monitoring results are shared during formal engagement sessions.<br><br>The evidence, supported by interviews, indicates that the company has established participatory monitoring of some environmental aspects, as well as mechanisms to share environmental monitoring information and to receive stakeholder input during implementation of the environmental monitoring program. |

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| | | | The evidence does not include information to confirm stakeholder participation in the implementation of the social component of the monitoring program. |
| 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. | ● | The evidence reviewed includes the Environmental Impact Assessment (EIA) for a Smelter (Ascon Africa, 2016) near the community of Shurugwi, which documents public consultation meetings held on December 9 and 11, 2015. The documentation indicates that these meetings were attended by mine management, government regulators, interested stakeholders, and residents of Shurugwi Town and the Tongogara Rural District Council area. The EIA appendices include records of stakeholder comments received during the consultation process. Additional evidence includes fourteen (14) completed questionnaires from government departments (Ascon Africa, October–December 2015), indicating consultation with relevant government agencies as part of the EIA process. More recent evidence includes documentation related to the Environmental Prospectus & Environmental Management Plan for the Unki South Bulk Sample Collection (Black Crystal, September 2021) and the ESIA for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which both include summaries of stakeholder engagement processes; records of communications and meetings with the Environmental Management Agency (August 2022 to April 2023); and non-technical summaries of the ESIA in both English and Shona. The summary reports document stakeholder mapping, regulatory engagement, stakeholder meetings, notification and disclosure of the Solar PV Draft ESIA Report, and the collection of stakeholder comments with corresponding company responses. Additional evidence includes minutes of Community Engagement Forum and Community |

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| | | | Environment Committee meetings covering Q1 2023 to Q2 2025, which document stakeholder comments and, in several instances, assign responsibilities and follow-up actions.<br><br>The evidence indicates that stakeholder comments related to ESIA scoping, implementation, findings, conclusions, and recommendations, as well as to elements of the environmental and social monitoring program, were recorded and include company responses, clarifications provided during meetings, and documented follow-up actions. |
| 2.1.10.1. | (See NEW MINES VS EXISTING MINES below)<br><br>(NEW MINES) The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner.<br><br>(EXISTING MINES) At minimum, a summary of the potential significant environmental and social impacts associated with the mining operation shall be publicly available. | ◐ | Unki is an existing mine. The evidence reviewed includes the Safety, Health and Environment (SHE) Management Policy (Valterra Platinum, July 2025), which states that the policy and supporting SHE information will be made available to interested parties upon request. Photographs documenting public posting of the SHE Policy and Tailings Storage Facility (TSF) Awareness Programme materials (Anglo American, 2023–2024), which include information on TSF-related risks, indicate that these are displayed in publicly accessible locations, such as a local clinic and a government office.<br><br>Additional evidence includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025); records of the Community Engagement Forum and the Community Environment Committee meeting minutes (Unki Mine, 2023–2024); and records of the Community Health and Safety awareness session (Anglo American, 2022). These documents indicate that the company shares summaries of community health and safety risks and impacts, as well as selected air and water monitoring results, with community stakeholders through in-person meetings and awareness campaigns. Supporting evidence also includes Notices of Receipt of |


IRMA Initiative for Responsible Mining Assurance

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| | | | Environmental Monitoring Reports issued by the Environmental Management Agency (EMA, April 2025), confirming that environmental monitoring reports are submitted to the EMA as part of regulatory reporting requirements.<br><br>The evidence indicates that the company makes certain information related to community health and safety risks, impacts, and monitoring results available to community stakeholders through established engagement mechanisms and provides information to the regulator on environmental and social compliance through formal reporting processes. It also indicates that SHE-related information is available upon request.<br><br>The evidence does not include documentation to confirm that comprehensive information on risks and impacts is made publicly available in a manner that is broadly accessible to the general public, nor does it show that environmental and social impact assessment reports and supporting analyses are publicly accessible. |
| 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. | — | Not relevant. This requirement does not need to be scored at existing mines per IRMA Guidance issued in 2021. |
| 2.1.10.3. | The environmental and social management plan shall be made available to stakeholders upon request. | ● | The evidence reviewed includes the Safety, Health and Environment Management Policy (Valterra Platinum, July 2025), which commits to open and transparent communication with local communities and other stakeholders on safety, health and wellness, and |

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| | | | environmental matters, with the stated objective of promoting an environmentally responsible culture and supporting sustainable development. Additional evidence reviewed includes the Grievance Procedure (Anglo American, February 2024) and a Grievance Register for Q1–Q3 2025 (Unki Mine, 2025), which do not indicate any stakeholder requests related to access to, or disclosure of, the environmental and social management plan or associated information during the period assessed.<br><br>Interviews with company staff confirm that the company has not yet received a request from stakeholders for the environmental and social management plan, but that it would facilitate these documents if such a request were made. Interviews with a sample of stakeholders indicate that no requests for the environmental and social management plan have been made.<br><br>The evidence, supported by interviews, indicates that no requests for the environmental and social management plan have yet been made. |
| 2.1.10.4. | Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available. | ◔ | The evidence reviewed includes the Safety, Health and Environment Management Policy (Valterra Platinum, July 2025), which commits to open and transparent communication with local communities and other stakeholders on safety, health and wellness, and environmental matters, with the stated objective of promoting an environmentally responsible culture and supporting sustainable development. Additional evidence includes a presentation prepared for a Community Engagement Forum meeting covering Q3 2025 (Anglo American, March 2025), which includes information related to air and water quality monitoring and sampling activities. Evidence also includes a letter confirming submission of the Q1 2025 |

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| | | | Environmental Management Plan Report to the relevant regulatory authority (Anglo American, April 2025), bearing a receipt stamp from the agency.<br><br>The evidence indicates that the company communicates the findings of environmental and social monitoring reports to relevant authorities at least annually. The evidence also indicates that environmental participatory monitoring results have been shared with community stakeholders through participatory monitoring processes.<br><br>The evidence does not indicate that summary reports of the social monitoring program's findings, including data and methodologies, are publicly available at least annually. |
| 2.1.10.5. | (See NEW MINES VS EXISTING MINES below)<br><br>(NEW MINES) The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means.<br><br>(EXISTING MINES) The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means. | ◕ | Unki is an existing mine. The evidence reviewed includes minutes of the Community Engagement Forum (CEF) and Community Environment Committee meetings covering Q1 2023 to Q2 2025, which document discussions on operational updates, environmental impacts, community health and safety performance, and quarterly air and water quality monitoring results, including assigned responsibilities and status updates. Additional evidence reviewed includes the Safety, Health and Environment Communication and Participation Procedure (UNK-MIN-SHE-PRO-0008, Anglo American, January 2025), which outlines the process for internal and external communication and stakeholder engagement, including sharing internally or externally safety, health and environment monitoring and measurement results, as well as related objectives and programs. |

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| | | | Interviews with company staff indicate that performance information related to the environmental and social management plan (ESMP) is communicated through established stakeholder engagement forums, including quarterly CEF meetings. Interviews with a sample of stakeholders indicate that ESMP-related information is shared during these meetings.<br><br>The evidence, supported by interviews, indicates that ESMS-related information is communicated through formal engagement mechanisms.<br><br>The evidence does not include details to confirm that the existence of publicly available, site-specific ESMS documentation and the means of accessing such information have been publicized by appropriate means. |

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

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| Chapter Relevant? | No |
| Overall Chapter Score | Not relevant |
| Chapter Score Basis | Not relevant |

Chapter not relevant. The applicability of FPIC for this site was evaluated based on the evidence provided, including the Memo on Indigenous Peoples in the Context of Valterra Platinum Operations (Valterra Platinum, September 2025), which includes an assessment of potential impacts on Indigenous, traditional, and marginalized communities and concluded that the mining operations do not have adverse impacts on such communities. The assessment considered the Khoi and San Indigenous communities in South Africa, as well as the Doma and Tshwa Indigenous communities in Zimbabwe. Supplemental evidence includes the most recent Environmental and Social Impact Assessment developed for the site's Solar PV Facility (SLR Consulting, June 2023), which concluded that no Indigenous people have been identified within the project area. Additionally, the grievance log covering the period from January 2024 to March 2025 shows no complaints related to impacts on Indigenous peoples. Based on this assessment, there is no indication that there are Indigenous or traditional people whose legal or customary rights or interests are adversely affected by the mining operations.

Interviews during on-site audit with company personnel, community leaders, local NGO members, and governmental agencies, supported by the documentation provided by the company, and the audit team's research, do not indicate the presence of Indigenous or traditional people in the project area or that Indigenous or traditional peoples' rights or interests are affected by the company's mining activities.

## Chapter 2.3—Obtaining Community Support and Delivering Benefits

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 88% |
| Chapter Score Basis | 14 out of 16 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 2.3.1.1. | The operating company shall publicly commit to:<br>a. Maintaining or improving the health, social and economic wellbeing of affected communities; and<br>b. Developing a mining project only if it gains and maintains broad community support. | ● | The evidence reviewed includes a range of corporate and site-level documents, which are reflected in the Anglo American Sustainable Mining Plan available on the company's website and the Unki Sustainable Mining Plan 2021–2025. The evidence demonstrates the company publicly commitment to:<br>a. maintaining and improving the health, social, and economic well-being of affected communities. The Unki Sustainable Mining Plan publicly commits to livelihoods, health, and education programmes to support affected communities (Anglo American). Education-related evidence consists of the Education Launch Newsletter, records of Education Programme Launch Attendance, and the STEP-UP Education Project Performance Final Annual Report for |

| Req # | Requirement | Score | Basis for Rating |
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| | | | 2024 (all Anglo American). Livelihoods evidence includes the Livelihoods Newsletter and the AAP Livelihoods Project Performance Report for Takura Q4 2024 (Anglo American, 2024). Health-related evidence includes the Health Launch Minutes dated 28 April 2022, the Health Launch Newsletter, the AAP Health Project Performance Report for Q1 2024, and records from the Stakeholder Meeting at the District Development Coordinator's Office in 2022 (Anglo American 2022–2024). Water and WASH evidence comprises the WASH Committee Minutes from May 2022, and documentation of community boreholes drilled by location between 2009 and 2023 (Anglo American).<br><br>b. developing mining projects only if it gains and maintains broad community support. Corporate statements outline commitments to build and maintain community trust (Valterra Platinum, 2025). This is supported by documentation for the 50-megawatt solar power project, including engagement meeting minutes (Anglo American, 2023). Additional project engagement includes Masasa-Gutsa TSF Wall Raise Minutes (Anglo American, 2024) and subsequent TSF blast notifications (Valterra Platinum, 2025).<br><br>Interviews with stakeholders, including representatives of government agencies, confirm that the company supports initiatives that benefit affected communities.<br><br>The evidence, supported by interviews, indicates that the company complies with sub-requirements (a) and (b). |
| 2.3.2.1. | For new mines, the operating company shall demonstrate that it obtained broad community support from | — | Not relevant. Unki is an existing mine. |

| Req # | Requirement | Score | Basis for Rating |
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| | communities affected by the mining project, and that this support is being maintained. | | |
| 2.3.2.2. | For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support:<br>a. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project;<br>b. Was transparent;<br>c. Was free from coercion or manipulation; and<br>d. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups | — | Not relevant. Unki is an existing mine. |

| Req # | Requirement | Score | Basis for Rating |
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| | and marginalized members, prior to any decision or resolution. | | |
| 2.3.2.3. | For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support. | ◔ | The evidence reviewed includes the Community Engagement Forum (CEF) Terms of Reference (Valterra Platinum, 2025), which define the structure and function of formal engagement mechanisms between the mine and surrounding communities. The Unki Mine Grievance Register (2024–2025), CEF meeting minutes, Environmental and Social Impact Assessment (ESIA) documentation, and grievance feedback correspondence to Masasa and Mudzingwa communities (2025) provide additional documentation of ongoing engagement activities, grievance management processes, and communication with affected communities. These documents indicate that the mine has established formal mechanisms to inform communities, receive and address grievances, and maintain structured dialogue with community representatives.<br><br>Interviews with company representatives and community stakeholders, together with a review of meeting records, indicate that the mine maintains regular engagement with affected communities. The majority of community stakeholders reported support for the mine operation and noted its positive impacts on communities such as improvements in education, housing, local economic activity, employment opportunities, reproductive health services, and access to healthcare. In a minority of cases, community members reported perceived impacts associated with open-pit mining, including dust, alleged structural damage to homes, rockfalls, and inadequacy of consultation. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | The evidence, supported by interviews, indicates that the company is earning and is maintaining broad community support with most, but not all, affected community members.<br><br>The evidence does not provide details to confirm that support is consistent across stakeholder groups, and continued efforts may be required to strengthen the consistency of support. |
| 2.3.3.1. | The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company's contributions to community development initiatives and benefits in affected communities. | ◕ | The evidence reviewed includes Community Engagement Forum (CEF) and Socio-Economic Development (SED) process documentation, CEF meeting minutes, records of workshops conducted with LiD Consultants, Techno Serve, and STEP-Up program materials, which describe the company's stated intention to collaborate with affected communities and other stakeholders to guide its contributions to community development initiatives and benefits in affected communities.<br><br>Interviews with a sample of stakeholders, including affected community members, indicate participation in the planning and design of programmes related to horticulture, sanitation facilities (toilets), boreholes, education, water quality, and other social development initiatives, and that they generally described the process as inclusive and responsive to community needs. However, in Dzikamidzi, Pasimupindu, and Village 17, community members reported that the relocation of schools did not adequately account for increased travel distances for children.<br><br>The evidence, supported by interviews, indicates that the company has established and implemented a participatory planning process to guide most of its contributions to community development |

| Req # | Requirement | Score | Basis for Rating |
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| | | | initiatives and benefits in affected communities, in collaboration with affected communities and other relevant stakeholders.<br><br>The evidence does not provide details to confirm that all material concerns raised during the planning process are consistently addressed in final decisions. |
| 2.3.3.2. | The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency. | ● | The evidence reviewed includes the Stakeholder Engagement Procedure (Unki Mine, 2025), Social and Economic Development and Social Transition Assessment and Plan field data (Anglo American 2021) which indicate the use of separate focus groups for men and women to gather feedback and inform program design; Community Engagement Forum Terms of Reference (Valterra Platinum 2025), Community Health Baseline Report (Anglo American) and STEP-Up baseline survey and profiling report (2022). These materials describe the intentional inclusion of marginalized and vulnerable groups, consider balanced gender representation, and outline governance and communication practices designed to support transparency in the planning process. Sample meeting minutes indicate that both male and female farmers are involved in planning agricultural activities alongside representatives of implementing partners. Additional evidence includes the Takura Jobs Created database, disaggregated by gender and age, which further documents participation by women, men, and youth across project activities.<br><br>Additional evidence includes Community Engagement Forum (CEF) minutes (Q1 2023; Q1 2025) and documentation related to the launch of health, education, and livelihoods programmes (2021– |

| Req # | Requirement | Score | Basis for Rating |
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| | | | 2023), which indicate that the planning process is communicated to stakeholders through established engagement mechanisms. Interviews with affected community members indicate that marginalized groups are included in company planning processes and that they are aware that community representatives participate in the planning process through the CEF meetings. The evidence, supported by interviews, indicates that the company communicates the planning process to stakeholders through established engagement mechanisms and that participatory planning processes include marginalized and vulnerable groups. |
| 2.3.3.3. | If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process. | ● | The evidence reviewed includes the Community Engagement Forum (CEF) Terms of Reference (Valterra Platinum 2025), which establishes a mechanism through which community members may request funding for mutually agreed-upon independent experts to support participatory processes. Supporting evidence includes CEF meeting minutes (2023-2025), Social and Economic Development and Social Transition Assessment and Plan field data (Anglo American 2021), Community Health Baseline Report (Anglo American), and STEP-Up baseline survey and profiling report (2022), which indicate that while affected communities have not made such requests to date, Unki has proactively engaged external specialists to support Social and Economic Development (SED) planning, including baseline studies on health, education, and livelihoods. Interviews with affected community members indicate awareness of this mechanism and that access to external expertise is |

| Req # | Requirement | Score | Basis for Rating |
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| | | | understood and reinforced through the experts' active involvement in CEF-related processes.<br><br>The evidence, supported by interviews, indicates that the company has not yet received requests from affected communities for expert support, but that it would provide funding upon request. |
| 2.3.3.4. | Efforts shall be made to develop:<br><br>a. Local procurement opportunities;<br><br>b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and<br><br>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). | ● | The evidence reviewed includes the company's procedures, reports, records and contracts relevant to local procurement, livelihoods, and community programmes, indicating that efforts were made to develop:<br><br>a. Local procurement opportunities, as indicated by the Local Vegetable Purchase Reports (no author, 2022 to 2025) and the Grower Contract (Takura and farmers groups, no date), which demonstrate that the company sources from local suppliers and approved farms with basic participation requirements (e.g., approved grower groups and minimum contractual requirements); and by the People and Organization Local Recruitment (Anglo American, 2025), which defines selection and hiring requirements at the site;<br><br>b. Initiatives benefiting a broad spectrum of the community, including women, men, children, youth, and vulnerable or traditionally marginalized groups, where applicable, as indicated by the External Commitments Register (Anglo American, 2023, 2024 and 2025) and the Livelihood Project Performance Report (Anglo American, July 2024). Additional evidence includes the Community Boreholes Drilled by Location 2009–2023, which records boreholes drilled by location over the period 2009–2023; and |

| Req # | Requirement | Score | Basis for Rating |
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| | | | c. Mechanisms intended to support sustainability after mine closure, as indicated by the Education Project Performance Report (Anglo American, 2024), and several programs, such as Unki Education Programme, Unki Empowering and Connecting Youth to Opportunities, and Creating Local Employment. Supporting evidence includes Community Engagement Forum Minutes covering Q1 2023 to Q2 2025 and the Unki Mine Community Health Program (Anglo American, September 2023), indicating programme implementation, stakeholder engagement, and capacity-building activities (e.g., training and institutional support) intended to enable community members and institutions to oversee and sustain initiatives beyond mine closure.<br><br>Interviews with a sample of stakeholders, including affected community members, government officials, and key staff, indicate that these activities are implemented in practice. Interviewees noted that differences in traditional leadership structures across communities may affect access to local procurement mechanisms and that alternative approaches have been explored under existing circumstances.<br><br>The evidence, supported by interviews, indicates that the company complies with sub-requirements (a) through (c). |
| 2.3.3.5. | The planning process and any outcomes or decisions shall be documented and made publicly available. | ◔ | The evidence reviewed includes Community Engagement Forum (CEF) minutes (Q1 2023; Q1 2025) and documentation related to the launch of health, education, and livelihoods programmes (2021–2023), which indicate that the planning process, as well as certain outcomes and decisions, are documented and communicated through established engagement mechanisms. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Interviews with affected community members and other stakeholders indicate that formal engagement structures are in place, and report that the company generally provides relevant information during CEF engagement sessions. Most interviewees expressed general satisfaction with the CEF process, and several noted improvements in communication in recent years. Some interviewees indicated that information shared through the CEF is not consistently communicated back to the broader community, and some stakeholders noted that the quarterly frequency of CEF meetings limits timely input on certain issues.<br><br>The evidence, supported by interviews, indicates that elements of the planning process and related decisions are documented and communicated through formal mechanisms.<br><br>The evidence does not indicate that planning process documentation and related outcomes or decisions are consistently made publicly available to all affected communities. |
| 2.3.3.6. | In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements. | ◔ | The evidence reviewed includes the Socio-Economic Development Mid-Term Review Report (Anglo American, 2023), which records monitoring and evaluation activities and references indicators agreed with community participation. A STEP-Up Baseline Survey Report (2022) provides baseline information used to inform the development of monitoring indicators. In addition, the STEP-Up Final Annual Outcome Monitoring Report (Anglo American, 2023) indicates that the company and affected communities collaborate to apply indicators to assess the effectiveness of mechanisms and agreements intended to deliver community benefits. Additional evidence includes the Apostolic Women Empowerment Trust Contract – Development and Use of Community-Led Monitoring |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Frameworks (Anglo American, 2022), which defines the scope of work for Apostolic Women Empowerment Trust under the Adolescent Specialist Programme for community health and wellbeing and describes the role of implementation partners in supporting community-led monitoring activities. Supporting evidence includes the Shurugwi Reading Club Monitoring Report (Book Aid International, World Vision, Anglo American, no date), which records programme implementation and beneficiary participation, and minutes of Community Engagement Forum meetings covering Q1 2023 to Q2 2025, indicating that progress on community initiatives is tracked and discussed jointly with community members.<br><br>Interviews with affected community members indicate participation in monitoring and evaluation processes related to community benefit mechanisms. Interviewees reported that participation levels vary, with some community members more actively engaged, including a designated community representative who conducts environmental monitoring activities on behalf of the community. Interviewees also indicated that affected communities collaborate with the company in developing indicators and monitoring the delivery of community benefits.<br><br>The evidence, supported by interviews, indicates that the company collaborates with affected communities to develop indicators and monitor the effectiveness of mechanisms and agreements intended to deliver community benefits.<br><br>The evidence does not indicate that monitoring results are systematically used to evaluate whether changes are required to those mechanisms or agreements. |

## Chapter 2.4—Resettlement Requirements

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| Chapter Relevant? | No |
| Overall Chapter Score | Not relevant |
| Chapter Score Basis | Not relevant |

Chapter not relevant. Based on interviews with key personnel and the evidence reviewed, which includes a Resettlement Action Plan (Anglo American, 2019), the company has undertaken three (3) resettlements to date in 2001 (22 households), 2003 (20 households), and 2006 (6 households). There is no indication that resettlement has occurred after April 30, 2006. In accordance with IRMA Standard Guidance (June 2023), resettlement processes completed prior to April 30, 2006, are not subject to outcome evaluation under this chapter; any issues identified would be addressed, as applicable, under other relevant IRMA chapters.

Interviews during the on-site audit with community stakeholders and governmental agencies confirmed that there has been no resettlement, including economic displacement, due to site's operation and expansions since April 30, 2006.

## Chapter 2.5—Emergency Preparedness and Response

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 100% |
| Chapter Score Basis | 12 out of 12 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 2.5.1.1. | Critical. All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, | ● | The evidence reviewed includes the site's Emergency Response Plan (ERP) (v.6, Valterra Platinum, August 2025), the Business Continuity Management Plan (BCMP) (v.14, Valterra Platinum, June 2025), the Community Emergency Preparedness and Response Plan (CEPRP) (v.6, Valterra Platinum, July 2025). The BCMP provides |

| Req # | Requirement | Score | Basis for Rating |
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| | Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining. | | the framework for site emergency response, while the ERP defines response teams and operational actions for 22 emergency scenarios, including coordinated actions with communities where relevant. The CEPRP, as an addendum to the BCMP, focuses on potential impacts to nearby communities. A Pre-Emergency Recovery Plan for a Tailings Storage Facility (TSF) Failure (v.1, Valterra Platinum, July 2025) provides details on recovery and restoration following a tailings dam failure. These documents address the key emergency preparedness and response components outlined in Appendix 1 of the 2001 UN APELL for Mining.<br><br>Additional evidence indicates that the company's emergency preparedness and response framework aligns with the UNEP APELL steps, as summarized below.<br><br>- Steps 1, 5, and 6: Identification of emergency response participants, roles, resources, and concerns; matching of response tasks to available resources; and integration of emergency response arrangements are documented in the ERP, BCMP, and CEPRP, which address internal and external stakeholders. Community participation and coordination with authorities are formalized through the Community Emergency Committee (CEC), with quarterly meeting records documenting engagement by village heads, mine management, and the District Civil Protection Unit (DCPU), including agreement on roles, resources, and coordinated response arrangements (Anglo American, 2021–2024).<br><br>- Steps 2 and 4: Evaluation of emergency risks and hazards, and identification of risk reduction options and response gaps are reflected in the ERP's 22 emergency scenarios and through ongoing CEC discussions of community-specific risks (e.g., Q2 2024). The |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Lucilia Poort Dam (2024) and Tailings Storage Facility (TSF) (2025) Vulnerability Assessments further document household-level exposure and vulnerability characteristics, informing emergency planning discussions and reviews, as reflected in stakeholder engagement and ERP review records (Anglo American, 2021–2025).<br><br>- Steps 3 and 7: Review of emergency response plans and coordinated response arrangements, as well as formalization and approval of plans is evidenced by version-controlled emergency response documentation (ERP, BCMP, and CEPRP) and supported by authority involvement documented in Capacity Assessment, ERP Review, and Recovery Plan Minutes (Anglo American, November 2024), Disaster Recovery Planning Meeting Minutes (Anglo American, February 2025), and DCPU participation documented in CEC meeting records (Anglo American, 2024). CEC meeting minutes (Q1 2025) indicate involvement of the District Development Coordinator in the development and/or review of the Pre-Emergency Recovery Plan for a TSF Failure.<br><br>- Steps 8, 9, and 10: Communication of emergency response arrangements, training of responders, periodic testing, updating, and communication to the general community are supported by CEPRP distribution registers signed by local authorities and schools (Valterra Platinum, 2025), ERP flyers (Anglo American, no date), the Community Emergency Training Plan (Valterra Platinum, 2025), community first-aid training records (2024–2025), and documented qualifications of emergency planning personnel (Anglo American, November 2024). Ongoing testing and review are evidenced by multiple field-based and desktop emergency drills (Anglo American, 2023–2025) involving workers and where applicable, community |

| Req # | Requirement | Score | Basis for Rating |
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| | | | participation, worker feedback meetings (2024–2025), and regular CEC engagement.<br><br>Interviews with relevant staff and community stakeholders confirm that the Community Emergency Committee (CEC) described in the emergency response documentation is active and meets quarterly to discuss mine-related emergency preparedness and response. Staff explained that emergency drill scenarios are selected based on incident learnings and potential impact severity, and that drills are scheduled annually on a rotational basis. Interviews with community stakeholders and workers, including contractors, reported participation in emergency preparedness activities and awareness of emergency notification procedures and evacuation routes.<br><br>The evidence, supported by interviews, indicates that the company has established and maintains an Emergency Response Plan (ERP) and a Community Emergency Preparedness and Response Plan (CEPRP), integrated within a broader Business Continuity Management Plan (BCMP), that are consistent with the components outlined in Appendix 1 and the Ten Steps of the UNEP APELL for Mining. |
| 2.5.1.2. | The operating company shall:<br><br>a. 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 | ● | The evidence reviewed includes samples of annual emergency drill schedules, mock drill call registers, action plans, drill reports (e.g., Lucilia Poort Dam Failure, December 2023; Accidental Detonation of Explosives due to a Misfire, September 2024; and Fall of Ground, March 2025), and emergency contact forms (Anglo American, 2023–2024; Valterra Platinum, 2025).<br><br>This documentation indicates that the company: |

| Req # | Requirement | Score | Basis for Rating |
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| | b. Update the communications contacts of the emergency response plan at least annually. | | a. conducts emergency drill exercises with key participants, including workers, community members, and local agency representatives, at least every 12 months to test emergency response effectiveness, covering different emergency scenarios. Drill schedules for 2023, 2024, and 2025 show approximately eight (8) drills planned annually, corroborated by mock drill call registers, drill reports, and action plans. The drill reports include analyses to identify opportunities for improvement.<br><br>b. updates the communication contacts of the emergency response plan at least annually. This includes internal Emergency Response Teams, company officers, and key contacts from external emergency services, community members, and service providers as documented in the annually updated Emergency Response Teams Contacts Record (Anglo American, 2023–2024; Valterra Platinum, 2025) and Emergency Preparedness Contact Numbers (Anglo American, 2023–2024; Valterra Platinum, 2025). CEC meeting minutes (June 2024 and March 2025) confirm that drill reports and emergency contact updates were reviewed with the community.<br><br>Interviews with staff confirm that drill schedules are established annually on a rotational basis. In 2025, eight (8) drills were conducted, one (1) of which included communities and a governmental agency. Interviews with community stakeholders and workers, including contractors, confirm participation in emergency drills within the last 12 months.<br><br>The evidence, supported by interviews, indicates that the company conducts exercises to test the emergency response plan and updates emergency contact information in alignment with sub-requirements (a) and (b). |

| Req # | Requirement | Score | Basis for Rating |
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| 2.5.2.1. | Critical. The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises. | ● | The evidence reviewed includes the site's Emergency Response Plan (ERP) (v.6, Valterra Platinum, August 2025), Business Continuity Management Plan (BCMP) (v.14, Valterra Platinum, June 2025), and Community Emergency Preparedness and Response Plan (CEPRP) (v.6, Valterra Platinum, July 2025), which set out different components of the site's emergency preparedness and response framework, with the BCMP providing the overarching framework for the ERP and the CEPRP.<br><br>Evidence of consultation and review with potentially affected communities, workers/workers' representatives, first responders, and relevant authorities is documented through consultations with government authorities and first responders on TSF-related emergency procedures (Capacity Assessment, ERP Review, and Recovery Plan Meeting Minutes, Anglo American, November 2024; Disaster Recovery Planning Meeting Minutes, Anglo American, February 2025), community engagement related to the CEPRP (samples of quarterly stakeholder meetings and feedback, 2021–2024; Masasa and Gutsaruzhinji EPRP meeting minutes, Anglo American, February 2025; TSF-related Individual Right-holder Engagement Report, Anglo American, August 2023), and ERP review sessions with worker's representatives, workers, and contractors (attendance registers, Valterra Platinum, December 2024–September 2025). Ongoing coordination with communities and authorities is further documented in quarterly Community Emergency Committee (CEC) meeting minutes (Q1 2023–Q2 2025).<br><br>A sample of the company's drill reports (Lucilia Poort Dam Wall Failure, December 2023; Fall of Ground, March 2025; TSF Dam Failure, March 2025; and Casting Bay Explosion, May 2025), supported by roll call registers and photos, indicates that workers, |

| Req # | Requirement | Score | Basis for Rating |
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| | | | community stakeholders, and first responders participate in emergency drill exercises and that their feedback is gathered following each emergency drill exercise. A summary of TSF Drill Feedback and Learnings (Valterra Platinum, June 2025) indicates that lessons learned are shared with relevant stakeholders during ERP meetings. Examples of feedback incorporated into the current CEPRP and ERP based on stakeholder consultation and emergency drills include adjustment of assembly points in Masasa village based on community input during an April 2023 consultation on TSF wall failure response, and refinement of emergency response steps based on worker suggestions documented in the SHE Committee's Emergency Preparedness and Response Plan Review Feedback (Valterra Platinum, August 2025).<br><br>Interviews with managerial and safety staff confirm that drill performance is reviewed after each exercise, and that action plans are tracked in Isometrix. Interviews with community stakeholders and workers, including contractors, confirm participation in emergency drills within the past 12–24 months.<br><br>The evidence, supported by interviews, indicates that emergency response planning is developed and reviewed through documented consultation with potentially affected communities and workers/workers' representatives, that stakeholder input is incorporated into emergency response plan updates, and that emergency response planning exercises are conducted with the participation of workers, contractors, potentially affected communities, first responders, and relevant authorities. |
| 2.5.3.1. | All operations related to the mining project shall be covered by a public | ● | The evidence reviewed includes the insurance contract for Valterra Platinum Limited (B0509BOWCI2550428, Marsh, June 2025), which |

| Req # | Requirement | Score | Basis for Rating |
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| | liability accident insurance policy that provides financial insurance for unplanned accidental events. | | provides global coverage for the insured's operations, encompassing all owned, controlled, associated, affiliated, and subsidiary entities, as well as contractors and subcontractors. It is valid from 01 June 2025 to 31 May 2026 and covers Products Liability, Pollution Liability, Professional Indemnity, and Financial Loss.<br><br>Additional supporting evidence includes the Business Combined Policy (HREBSCCP0015046, Alliance Insurance Company (Pvt) Ltd, October 2025) and the Umbrella Liability Policy (HREUMBRP0015015, Alliance Insurance Company (Pvt) Ltd, October 2025). Both policies list Unki Mines Main as the insured and cover the period from 1 October 2025 to 31 May 2026, inclusive. These policies cover all sums the insured is legally liable to pay as compensation arising from any claim related to accidental bodily injury to any person or accidental physical loss or damage to property occurring within Zimbabwe and in connection with the insured's business operations.<br><br>The evidence indicates that Unki Mine operations are covered by public liability accident insurance through a corporate-level policy held by Valterra Platinum Limited, and by a Business Combined Policy and an Umbrella Liability Policy, both held at the local level with Unki Mines as the insured. |
| 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. | ● | The evidence reviewed includes the insurance contract for Valterra Platinum Limited (B0509BOWCI2550428, Marsh, June 2025), which provides global coverage for Products Liability, Pollution Liability, Professional Indemnity, and Financial Loss. Additional evidence includes the Business Combined Policy (HREBSCCP0015046, Alliance Insurance Company (Pvt) Ltd, October 2025) and the Umbrella Liability Policy (HREUMBRP0015015, Alliance Insurance |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Company (Pvt) Ltd, October 2025), which are both held at the local level by Unki Mine as the insured. These policies cover all sums that the insured is legally liable to pay as compensation arising from any claim related to accidental bodily injury to any person or accidental physical loss or damage to property. An excerpt from the Valterra Platinum Ltd. Insurance Summary 2025–2026 (Marsh, June 2025) outlines that all risks are covered unless specifically excluded.<br><br>Interviews with relevant staff indicate that the insurance covers unplanned accidental events, including but not limited to flood damage, landslides, subsidence, and similar events.<br><br>The evidence indicates that the mining company holds insurance policies covering public liability arising from unplanned accidental events related to the mine, including incidents such as flood damage, landslides, subsidence, failures of mine waste facilities, major spills of process solutions, or leaking tanks. |
| 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. | ● | The evidence reviewed includes the insurance contract for Valterra Platinum Limited (B0509BOWCI2550428, Marsh, June 2025), which is valid from 01 June 2025 to 31 May 2026, and the Business Combined Policy (HREBSCCP0015046, Alliance Insurance Company (Pvt) Ltd, October 2025) and the Umbrella Liability Policy (HREUMBRP0015015, Alliance Insurance Company (Pvt) Ltd, October 2025), both valid from 01 October 2025 to 31 May 2026.<br><br>The evidence indicates that the public liability coverage remained in force even after the ownership transition from Anglo American to Valterra Platinum at the end of May 2025. |

# Chapter 2.6—Planning and Financing Reclamation and Closure

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 61% |
| Chapter Score Basis | 22 out of 36 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 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. | ◐ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, 2024), which outlines the site's mine closure strategy and provides preliminary cost estimates, including for areas disturbed by exploration activities such as the 2023 bulk sampling project. An Agreement for Supply of Services (Anglo American, November 2019) with the exploration drilling contractor includes provisions for the rehabilitation of drillholes and sumps. Additionally, the 2026 Unki Exploration Drilling Budget (Valterra Platinum, June 2025) indicates that exploration rehabilitation expenses are included in the company's 2026–2030 operational budget.<br><br>The evidence indicates that the company has a reclamation plan for exploration activities and has considered associated costs for exploration-related disturbances in closure estimates and operational budgets.<br><br>The evidence does not include documentation indicating that the company has formally committed to covering the full cost of implementing reclamation for exploration activities. |

| Req # | Requirement | Score | Basis for Rating |
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| 2.6.1.2. | The operating company shall implement exploration-related reclamation in a timely manner. | ● | The evidence reviewed includes the Surface Drilling Procedure (Valterra Platinum, last revised July 2025), which assigns drilling contractors responsibility for rehabilitating drill pads and completing rehabilitation records at the conclusion of drilling programs, as well as a sample Agreement for Supply of Services with a drilling contractor (Anglo American, November 2019). Additional evidence includes a sample of rehabilitation records from 2018–2025, including Drill Site Inspection Reports and Drilling Site Rehabilitation and Sign-off Checklists, which demonstrate that rehabilitation, site surveying, and inspections for drill pads and other standard exploration activities are typically completed within a few days after drilling concludes.<br><br>The 2026 Unki Exploration Drilling Budget (Valterra Platinum, June 2025) confirms that exploration-related rehabilitation costs are incorporated into the company's operational budget. For the 2023 bulk sampling activities, the Closure Liability Estimate (SRK Consulting, 2024) includes estimated costs for rehabilitation of the small open pits created, and the Environmental Prospectus & Environmental Management Plan Report for the Proposed Unki South Bulk Sample Collection (Black Crystal, September 2021) outlines the planned rehabilitation measures, including backfilling and revegetation.<br><br>Interviews with key personnel indicate that rehabilitation of the bulk sampling pit has not yet been implemented and is pending completion of sample analysis and a final determination on whether the bulk sampling project will proceed, before rehabilitation activities are undertaken.<br><br>The evidence indicates that exploration-related reclamation is implemented in a timely manner for drill pads and other routine |

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| | | | exploration activities. For the bulk sampling pit, rehabilitation has been planned, costed, and documented, with implementation deferred until a final decision on the project's viability is made.<br><br>The timeliness of exploration-related rehabilitation, including that of the bulk sampling pit, if applicable, will be re-assessed during the next IRMA audit. |
| 2.6.1.3. | Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4). | ● | The evidence reviewed includes Grievance Registers for 2023–2025 extracted from the Isometrix system, which show no records of stakeholder complaints or grievances related to incomplete or inadequate exploration reclamation. Additional evidence includes a sample of records from stakeholder engagement meetings with communities potentially affected by the bulk sampling activities (Anglo American, August 2022 to September 2023), which document ongoing discussions between the company and stakeholders regarding potential and actual impacts and associated mitigation measures, including fencing of the bulk sampling pit and rehabilitation of previously used access roads.<br><br>Interviews with nearby community members identified concerns about the reclamation of open pits from bulk sampling activities, including impacts on available grazing land for cattle. Interviews with company personnel indicate that these concerns have not been submitted through the company's operational-level grievance mechanism, and that no grievance related to exploration reclamation has been received through formal grievance channels. Company representatives further indicated that rehabilitation of the bulk sampling pit is pending completion of sample analysis and a |

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| | | | final determination regarding whether the bulk sampling project will proceed.<br><br>The evidence, supported by interviews, indicates that an operational-level grievance mechanism is in place, accessible to stakeholders, and has been actively used to address and resolve issues raised by community members (see Chapter 1.4). The evidence further indicates that no stakeholder complaints of incomplete or inadequate exploration reclamation have been submitted through this mechanism. |
| 2.6.2.1 | Critical. Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use. | ◔ | The mine commenced operations between 2008 (mining) and 2010 (processing). Evidence reviewed includes the Environmental Management Plan (Scott Wilson, August 2003), which outlined initial decommissioning concepts, as well as subsequent Rehabilitation, Decommissioning, and Mine Closure Plans (SRK, November 2018 and 2021), and more recent Closure Liability Estimates (SRK, November 2022, November 2023, and February 2024) that incorporate conceptual closure planning.<br><br>The 2024 Closure Liability Estimate indicates that production can continue at least until 2045. It defines the closure vision and objectives based on national legislation, corporate standards (e.g., Anglo American Mine Closure Standard), and best practice guidelines, with the aim of protecting human health and the environment and returning affected areas to a safe, stable, and non-polluting landscape capable of supporting beneficial and sustainable post-mining land uses. The plan includes a proposed post-mining land-use map (Figure 9-1) and identifies opportunities for land regeneration through nature-based solutions, circular- |

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| | | | economy practices, and the establishment of a conservation area in the southern complex (Section 9).<br><br>Regarding stakeholder engagement, the closure plan indicates that local communities potentially affected by mine closure will be engaged approximately five (5) years prior to closure through capacity-building workshops, enabling them to provide input on potential post-mining land uses. Additionally, a Community Engagement Forum Meeting (Valterra Platinum, June 2025) and a Community Engagement Forum presentation from Q3 2025 (Valterra Platinum, September 2025) documents the site presenting the 2024 closure plan to some community members and soliciting input on closure risks and proposed mitigation measures.<br><br>The evidence indicates that the operating company has developed reclamation and closure planning consistent with current expectations for protecting human health and the environment and for achieving a stable post-mining landscape. The mine has also initiated stakeholder engagement regarding potential post-mining land uses and has outlined a plan to seek agreements on post-closure land use.<br><br>The evidence does not include details confirming that the planned post-mining land use and annual rehabilitation activities were agreed upon by community stakeholders. |
| 2.6.2.2 | At a minimum, the reclamation and closure plan shall contain:<br><br>a. A general statement of purpose; | ◕ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which outlines assessments of rehabilitation, decommissioning, and closure plans for the mines.<br><br>The evidence includes: |

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| | b. Site location and background Information;<br><br>c. A description of the entire facility, including individual site features;<br><br>d. The role of the community in reviewing the reclamation and closure plan;<br><br>e. Agreed-upon (after-ESIA) post-mining land use and facility use;<br><br>f. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure;<br><br>g. Source mitigation program to prevent the degradation of water resources;<br><br>h. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization;<br><br>i. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable;<br><br>j. Earthwork: | | a. A statement of purpose of the report (Ch. 2.1).<br><br>b. Site location, land use, and environmental context (Ch. 1, 3 and 4).<br><br>c. A description of the facility and infrastructure (Ch. 3.2).<br><br>d. The role of the community in reviewing the reclamation and closure plan (Ch. 10).<br><br>e. The proposed final land use (Ch. 9).<br><br>f. Source and pathway characterization, specifically the TSF seepage plume migration modelled for 50 years (Ch. 10.3)<br><br>g. Mitigation programs to prevent the degradation of water resources (Ch. 10.3).<br><br>h. Interim operations and maintenance, including process water management, and mine site and waste site geotechnical stabilization (Ch. 10.3 and 15.4); with no post-closure water treatment (Ch. 18.3) or groundwater interventions not expected to be necessary (Ch. 10.3)<br><br>i. Rehabilitation and revegetation plan (Ch. 9).<br><br>j. Earthwork including:<br><br>i. Landfill plan (Ch. 10.1.7), as well as information that the mine area is flat and is not likely to be subjected to significant erosion (Ch. 8.2).<br><br>ii. Existing storm water diversion structures (Ch. 3.2).<br><br>k. Revegetation and ecological restoration, including:<br><br>i. and v. Plan to revegetate the area with the indigenous vegetation Ch. 9 and 17, Table 17-1). |

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| | i. Stabilization and final topography of the reclaimed mine lands;<br><br>ii. Stormwater runoff/run-on management;<br><br>iii. Topsoil salvage to the maximum extent practicable;<br><br>iv. Topsoil storage in a manner that preserves its capability to support plant regeneration;<br><br>k. Revegetation/Ecological Restoration:<br><br>i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use;<br><br>ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time;<br><br>iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed;<br><br>iv. Measures for control of noxious weeds;<br><br>v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6); | | iii. A defined period of 2 years for complete implementation of revegetation tasks with 10 years of maintenance (Table 14.4. and Section 19.2);<br><br>iv. The planting of invasive species will be avoided (Ch. 10.2.1).<br><br>l. Hazardous materials will be managed according to the operational Waste Management Plan and will be disposed of off-site (Ch. 10.2.5)<br><br>m. Facility demolition and disposal (Ch. 8, Table 8-2; Ch. 10.1.1).<br><br>n. Long-term maintenance plans (Ch. 19; Ch. 12, Table 12.1).<br><br>o. Post-closure monitoring plans (Ch. 19).<br><br>q. A schedule for all activities indicated in the plan (Ch. 14).<br><br>The evidence indicates that the company has considered most of the elements outlined in sub-requirements (a) through (q) in its reclamation and closure plan.<br><br>The evidence does not include details to confirm that the closure plan has considered:<br><br>j. Earthwork including:<br><br>iii. Topsoil salvage to the maximum extent practicable.<br><br>iv. Topsoil storage in a manner that preserves its capability to support plant regeneration.<br><br>k. Revegetation and ecological restoration, including:<br><br>ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time; |

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| | l. Hazardous materials disposal;<br>m. Facility demolition and disposal, if not used for other purposes;<br>n. Long-term maintenance;<br>o. Post-closure monitoring plan;<br>p. The role of the community in long-term monitoring and maintenance (if any); and<br>q. A schedule for all activities indicated in the plan. | | p. The role of the community in long-term monitoring and maintenance. |
| 2.6.2.3. | The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum:<br>a. Mobilization/demobilization;<br>b. Engineering redesign, procurement, and construction management;<br>c. Earthwork; | ◔ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which indicates that the closure plan cost estimation is based on the Standardized Reclamation Cost Estimator (SRCE) model developed by SRK Consulting. The SRCE model is designed under the assumption that reclamation will be carried out by a third party. Additional evidence includes an Excel spreadsheet containing the most recently updated SRCE model (SRK Consulting, September 2024).<br>The SRCE model, as presented in the 2024 Closure Liability Estimate, indicates that costs were estimated for the following activities:<br>c. Earthwork (i.e., regrading);<br>d. Revegetation/Ecological Restoration (i.e., regrading, growth media placement, revegetation); |

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| | d. Revegetation/Ecological Restoration;<br>e. Disposal of hazardous materials;<br>f. Facility demolition and disposal;<br>g. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including:<br>i. Interim process water and site management; and<br>ii. Short-term water treatment;<br>h. Post-closure costs for:<br>i. Long-term water treatment; and<br>ii. Long-term monitoring and maintenance;<br>i. Indirect Costs:<br>i. Mobilization/demobilization;<br>ii. Engineering redesign, procurement and construction management;<br>iii. Contractor overhead and profit;<br>iv. Agency administration;<br>v. Contingency; and<br>j. Either: | | f. Facility demolition and disposal (i.e., demo);<br>g. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two (2) years before actual reclamation begins, including:<br>i. Interim process water and site management (i.e., water management); and<br>ii. Short-term water treatment (i.e., water management).<br>h. Post-closure costs for:<br>i. Long-term water treatment; and<br>ii. Long-term monitoring and maintenance (i.e., Long-term monitoring, monitoring, and maintenance);<br>i. Indirect Costs:<br>iii. Contractor overhead and profit (20%);<br>iv. Agency administration (i.e., planning and permitting); and<br>v. Contingency (10%); and<br>j. Both:<br>i. A multi-year increase in the financial surety, due to inflation, as indicated using Consumer Price Index (CPI) inflation adjustments over time, discount rate, and inflation factors; and<br>ii. An annual review and update of the financial surety, as the SRCE model is updated annually to allow recalibration of costs.<br>The evidence indicates that the reclamation and closure plan includes a detailed determination of the estimated costs for reclamation, closure, and post-closure; is based on the assumption |

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| | i. A multi-year inflation increase in the financial surety; or<br>ii. An annual review and update of the financial surety. | | that a third party will complete reclamation and closure; adheres to regulatory agency requirements; and covers items (c) to (h), (i.iii to i.v), and (j).<br>The evidence does not include information to confirm that the reclamation and closure plan cost estimates consider costs associated with the disposal of hazardous materials (e), the mobilization and demobilization of equipment (a and i.i), as well as the engineering redesign, procurement, and construction management (b and i.ii). |
| 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. | ● | The evidence reviewed includes the Mine Closure Standard (Valterra Platinum, last reviewed June 2025), which prescribes annual reviews of the Plan, and the Closure Liability Estimate for the years 2021–2024 (SRK Consulting, November 2021, November 2022, November 2023, and February 2024). This evidence includes updates of both the estimated cost as of the day of assessment and at the end of mine life. The estimated costs at the end of mine life have been updated as follows: 2021 (USD 23,192,299); 2022 (USD 28,414,646); 2023 (USD 27,936,374); and 2024 (USD 28,914,154). The Safety, Health, and Environment (SHE) Policy (Valterra Platinum, July 2025) states that the company makes the policy and supporting documents available to the public and stakeholders upon request, via the grievance mechanism.<br>Interviews with relevant staff indicates that the reclamation and mine closure plan would be provided upon request, and that so far, no requests have been received.<br>The evidence, supported by interviews, indicates that the reclamation and closure plan, as well as financial assurance |

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| | | | estimates, are reviewed and updated on an annual basis to reflect any significant changes to the mine plan, and that the company would provide the reclamation and closure plans to stakeholders upon request. |
| 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:<br><br>a. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and<br><br>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 | ◕ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which outlines Anglo American's strategy for the mine's closure, emphasizing stakeholder engagement with local communities, governments, and environmental organizations, and the Mine Closure Toolbox (Anglo American, 2019), which highlights the importance of achieving stakeholder acceptance of the closure plan. These documents indicate that a detailed socio-economic transition program is under development to integrate stakeholders' perspectives on mine closure, including reclamation. The 2024 Closure Liability Estimate indicates that production may continue until at least 2045.<br><br>Regarding stakeholder engagement, the closure plan indicates that local communities potentially affected by mine closure will be engaged approximately five (5) years prior to closure through:<br><br>a. capacity-building workshops, enabling them to provide input on potential post-mining land uses.<br><br>Interviews with relevant staff confirm that stakeholder engagement is planned to be conducted prior to finalization of the mine closure plan (a), and generally indicate the company's willingness to support communities with access to and funding for independent experts (b), although no statements specific to such experts for the mine closure plan review phase have been made. |

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| | reclamation activities prior to release of part or all of the financial surety. | | The evidence indicates that the company has not yet developed a final reclamation plan, but that they plan to conduct capacity-building activities with potentially affected stakeholders prior to finalization of the plan to enable them to provide input (a), and that they are generally willing to provide communities with independent experts (b).<br><br>The evidence does not include details to confirm that the company will provide affected communities and interested stakeholders with a formal opportunity to propose independent experts to support their participation in the finalization of the mine closure plan (b). |
| 2.6.2.6. | Critical. The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request. | ● | The evidence reviewed includes the site-level Safety, Health, and Environment (SHE) Policy (Valterra Platinum, July 2025) and a presentation from the Q3 Community Engagement Forum (CEF) Meeting (Valterra Platinum, September 2025). The SHE Policy states that the company makes the policy and supporting documents available to the public and stakeholders upon request, via the grievance mechanism. A review of Grievance Registers (Anglo American, 2023 and 2024; Valterra Platinum, 2025) indicates that no requests for the reclamation and closure plan have been made to date. The Q3 CEF Meeting presentation documents that high-level summaries of closure assessment results were communicated to community representatives.<br><br>Interviews with relevant staff indicate that the reclamation and mine closure plan would be provided upon request, and that so far, no requests have been received.<br><br>The evidence, supported by interviews, indicates that the company provides summaries of closure assessment results to community |

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| | | | representatives and would make the most recent version of the reclamation and mine closure plan available to stakeholders upon request. |
| 2.6.3.1. | Open pits shall be partially or completely backfilled if:<br>a. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and<br>b. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and<br>c. It is economically viable. | — | Not relevant. The operation is an underground mine, and no open pit exists. |
| 2.6.3.2. | Underground mines shall be backfilled if:<br>a. Subsidence is predicted on lands not owned by the mining company; and<br>b. If the mining method allows. | — | Not relevant. The Non-Mandatory Code of Practice to Combat Rockfall and Rockburst Incidents (Anglo American, v4, 2024) states that, due to the mine's design, subsidence is not anticipated. InSAR monitoring is implemented as a precautionary measure to detect any potential subsidence. An analysis of InSAR data (Geoapp, December 2025), covering the period from October 2024 to December 2025, confirms that such monitoring is conducted.<br>Interviews with relevant personnel further indicate that subsidence is not predicted given the mining method and prevailing ground conditions. |

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| 2.6.4.1. | Critical. Financial surety instruments shall be in place for mine closure and post-closure. | — | Not scored. The Memo of Decision (IRMA, May 2023) states to not score requirements 2.6.4.1, 2.6.4.2, and 2.6.4.3 in countries without a state-hosted financial surety mechanism. In Zimbabwe, while legislation and regulatory requirements addressing mine rehabilitation and closure exist, there is currently no formal, state-hosted financial surety system to secure mine closure and post-closure rehabilitation obligations. |
| 2.6.4.2. | Financial surety instruments shall be:<br>a. Independently guaranteed, reliable, and readily liquid;<br>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;<br>c. In place before ground disturbance begins; and<br>d. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. | — | Not scored. The Memo of Decision (IRMA, May 2023) states to not score requirements 2.6.4.1, 2.6.4.2, and 2.6.4.3 in countries without a state-hosted financial surety mechanism. In Zimbabwe, while legislation and regulatory requirements addressing mine rehabilitation and closure exist, there is currently no formal, state-hosted financial surety system to secure mine closure and post-closure rehabilitation obligations. |
| 2.6.4.3. | Self-bonding or corporate guarantees shall not be used. | — | Not scored. The Memo of Decision (IRMA, May 2023) states to not score requirements 2.6.4.1, 2.6.4.2, and 2.6.4.3 in countries without a state-hosted financial surety mechanism. In Zimbabwe, while legislation and regulatory requirements addressing mine rehabilitation and closure exist, there is currently no formal, state- |

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| | | | hosted financial surety system to secure mine closure and post-closure rehabilitation obligations. |
| 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. | — | Not relevant. Since a regulated financial surety instrument is not in place as reviewed in 2.6.4.1, no financial surety reviews have been conducted. |
| 2.6.4.5. | Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:<br>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. | ⊗ | Since a regulated financial surety instrument is not in place as reviewed in 2.6.4.1, there is no evidence indicating that the public has at least 60 days to comment on the adequacy of the financial surety as indicated in a. to c. |

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| | b. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and<br><br>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. | | |
| 2.6.4.6. | The terms of the financial surety shall guarantee that the surety is not released until:<br><br>a. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and<br><br>b. Public comment has been taken before partial or final surety release. | ⊗ | Since a regulated financial surety instrument is not in place as reviewed in 2.6.4.1, there is no evidence indicating that the financial surety is not released until:<br><br>a. revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and<br><br>b. public comment has been taken before partial or final surety release. |
| 2.6.5.1. | Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the | ◕ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which describes post-closure monitoring and maintenance activities, including:<br><br>a. Inspection of underground mine workings, including mapping and monitoring of subsidence-prone areas, to determine the need |

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| | post-closure monitoring and maintenance of all mine facilities, including, but not limited to:<br>a. Inspection of surface (open pits) and underground mine workings;<br>b. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and<br>c. Mechanisms for contingency and response planning and implementation. | | for implementing appropriate measures such as fencing, access restrictions, or limiting further development of the area, along with monitoring programs to confirm the stability and effectiveness of rehabilitation measures, as outlined in the 2024 Closure Liability Estimate (sections 5.5 and 5.7; Table 17-1, Underground workings; section 19.2, monitoring to track relinquishment progress).<br>b. Inspection and maintenance of mine waste facilities, including the effectiveness of cover and seepage capture systems, as indicated in the 2024 Closure Liability Estimate, which outlines stabilization of tailings and waste rock facilities to limit leachate generation and water quality monitoring to detect potential contamination (section 10.3); and monitoring of soil fertility, vegetation cover, and erosion to assess rehabilitation effectiveness (section 5.5).<br>The evidence indicates that the Closure Liability Estimate (SRK Consulting, February 2024, final draft) includes specifications and estimated costs for post-closure monitoring and maintenance of all mine facilities, including the measures described in (a) and (b).<br>The evidence does not include details to confirm that the plan provides mechanisms for contingency and response planning and implementation (c). |
| 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. | ◐ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which identifies the potential for seepage from the Tailings Storage Facility (TSF). It indicates that current modelling supports that natural attenuation will be effective to limit the impact of seepage from TSF, and a provision is made to monitor the plume for 25 years (section 18.4). The 2024 |

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| | | | Closure Liability Estimate specifies that biomonitoring will occur at sampling points located downstream of mining activities, and that monitoring of ground and surface water quality should be continued until relinquishment criteria are achieved (section 19.2). Furthermore, the financial estimate in this document encompasses actions associated with the above-mentioned measures, including drilling of additional sampling points.<br><br>Additional evidence includes the Monitoring Programme Operating Procedures & Adaptive Management Plan (Anglo American, October 2022), which aims to guide management decisions in the event of changes in water quality performance at the mine. The plan specifies the locations and variables of concern for Receiving Water Resource (surface) compliance monitoring points (Table 7-1), Groundwater Monitoring Compliance Points (Table 7-2), and Surface Water Operational Control Monitoring Points (Table 7-3).<br><br>The evidence indicates that post-closure surface water and groundwater monitoring locations have been identified for certain compliance points and closed facilities, and that a structured monitoring and adaptive management framework is in place to detect potential contamination pathways and respond to emerging risks.<br><br>The evidence does not include details to substantiate that post-closure monitoring locations for surface water and groundwater will be sufficient to detect off-site contamination from all closed mine facilities, as well as at designated compliance points. |
| 2.6.5.3. | Water quality monitoring locations shall be sampled until IRMA Water Quality | ◕ | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which indicates that long-term |

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| | Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data.  The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively. | | monitoring will be implemented to track water quality and hydrological changes over time (Section 10.3), and identifies the potential for seepage from the Tailings Storage Facility (TSF). It notes that the company plans to validate its current assumption that monitored natural attenuation will effectively limit the impact of TSF seepage by conducting a 25-year plume-monitoring program. Furthermore, it specifies that the company will collect information to substantiate that the relinquishment criteria for surface water and groundwater have been met in accordance with local standards (Zimbabwe Environmental Management – Effluent and Solid Waste Disposal Regulation, 2007). The document also references the Anglo American Mine Closure Standard (AA TS 701 001), which requires monitoring and maintenance costs to be estimated to allow sufficient time for realistic relinquishment, with a minimum of 10 years following the decommissioning phase. The plan states that monitoring will continue until the most stringent standard limits for Effluent and Solid Waste Disposal set by regulation are met, which are partially aligned with the IRMA water quality criteria for water for human consumption.<br>The evidence indicates that the company's mine closure plan projects post-closure water quality monitoring based on a minimum of 25 years of data and consistent with local regulatory requirements.<br>The evidence does not include information to confirm that monitoring will continue until the IRMA Water Quality Criteria or the host country criteria have been met for at least 5 years. |
| 2.6.5.4. | Biologic monitoring shall be included in post-closure monitoring if required to | ● | The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which documents the company's |

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| | ensure there is no ongoing post-closure damage to aquatic and terrestrial resources. | | commitment to long-term biological monitoring of aquatic ecosystems, including the use of appropriate biological indices to track changes in biotic integrity. The plan also incorporates monitoring to support the natural succession of vegetation, addressing terrestrial ecosystem recovery. A Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., 2020), along with a series of Environmental and Social Impact Assessments (see 4.6.2.1), indicate that no significant impacts to terrestrial flora and fauna are expected from mining activities, and that the area had been previously affected by grazing.<br><br>The evidence indicates that post-closure monitoring plans will include monitoring to ensure the successful natural succession of vegetation, as well as biological monitoring in aquatic ecosystems. |
| 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. | — | Not relevant. No pit exists, and a pit lake is not predicted to form, as mining is conducted underground. |
| 2.6.6.1. | Long-term water treatment shall not take place unless:<br><br>a. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and | — | Not relevant. The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which indicates that no interventions are required to manage groundwater at closure (i.e., long-term water treatment is not necessary).<br><br>Interviews with relevant staff confirm that long-term water treatment is not necessarily based upon monitoring data and modelling exercises. |

| Req # | Requirement | Score | Basis for Rating |
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| | b. The operating company funds an engineering and risk assessment that:<br>i. Is carried out by an independent third-party:<br>ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods;<br>iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms;<br>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<br>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 | — | Not relevant. The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which indicates that no interventions are required to manage groundwater at closure (i.e., long-term water treatment is not necessary). |

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| | practicable efforts to minimize the volume of water to be treated. | | Interviews with relevant staff confirm that long-term water treatment is not necessarily based on monitoring data and modelling exercises. |
| 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. | ◐ | The evidence reviewed includes the Annual Financial Statement for the year ended December 31, 2024 (Unki Mine, 2025), which reports environmental rehabilitation provisions comprising decommissioning and restoration costs, as well as the environmental rehabilitation provision before funding, totaling USD 40,253,974 based on the annual closure liability estimate as of December 31, 2023 (SRK Consulting, 2023). This estimate concludes a liability of USD 29,170,319 on the day of assessment and USD 27,936,374 at the end of the Life of Mine (excluding Contingencies and Preliminary and General Costs).<br><br>The evidence indicates that the company provides financial assurance for long-term activities, including mine closure and post-closure site monitoring, maintenance, and water treatment, as reflected in the 2023 closure liability estimate.<br><br>The evidence does not include sufficient information to confirm that financial assurance will guarantee the availability of funds, regardless of the operating company's financial status at the time of mine closure or bankruptcy, because the corresponding policy has not been submitted for review. |
| 2.6.7.2. | If long-term water treatment is required post-closure:<br><br>a. The water treatment cost component of the post-closure financial surety shall | — | Not relevant. The evidence reviewed includes the Closure Liability Estimate (SRK Consulting, February 2024), which indicates that no interventions are required to manage groundwater at closure (i.e., long-term water treatment is not necessary). |


IRMA Initiative for Responsible Mining Assurance

| Req # | Requirement | Score | Basis for Rating |
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| | be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and<br><br>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. | | Interviews with relevant staff confirm that long-term water treatment is not necessarily based on monitoring data and modelling exercises. |
| 2.6.7.3. | The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety. | ⊗ | Does not meet. The evidence reviewed, including the Annual Financial Statement for the year ending on December 31, 2024 (Unki Mine, 2025) and the draft Closure Liability Estimate (SRK Consulting, February 2024), confirms that rehabilitation, decommissioning, and post-closure cost estimates are prepared and reviewed by independent third parties.<br><br>However, as the post-closure financial surety instrument is not in place (see 2.6.4.1), there is no evidence that the post-closure financial surety is recalculated and independently reviewed concurrently with the reclamation financial surety. |

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| 2.6.7.4. | Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:<br><br>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<br><br>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). | ⊗ | Does not meet. The evidence reviewed includes the Annual Financial Statement for the year ended December 31, 2024 (Unki Mine (Private) Limited, 2025), which incorporates provisions for environmental rehabilitation and applies a real discount rate of 1.9% for closure-related liabilities.<br><br>However, since a financial surety instrument is not in place as reviewed in 2.6.4.1, there is no evidence indicating that long-term Net Present Value (NPV) calculations are used to estimate the value of a financial surety or that such calculations include conservative assumptions as required under sub-requirements (a) and (b). |

# Principle 3: Social Responsibility

## Chapter 3.1—Fair Labour and Terms of Work

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 87% |
| Chapter Score Basis | 48.5 out of 56 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 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. | ● | The evidence reviewed includes the Employment Code of Conduct (Anglo American, May 2016), which states that it was formulated, negotiated, and registered following the terms of Section 101 of the Labour Act (Chapter 28:01) and applies to all employees and any future group companies. Additional evidence includes a Human Rights Policy (Anglo American Group, October 2021), which describes the company's approach to human rights across operations and relationships with workers and business partners; an Accountability Policy (Anglo American Group, June 2023), which outlines expected behaviours and corresponding responses; a Whistleblowing Policy (Anglo American Group, November 2022), which establishes confidential and anonymous channels for reporting concerns and sets out non-retaliation commitments; and a Responsible Sourcing Standard for Suppliers (Valterra Platinum, June 2025), which sets minimum legal, sustainability, and decent work requirements for suppliers. Further evidence includes procedures on Sick Leave Management, Recruitment and Selection, Overtime, Non-Retaliation, Disciplinary Hearing and Grievance Handling, Collective Job Action, and Freedom of Association (Anglo |

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| | | | American, Valterra Platinum, 2022-2025), which establish rules and processes for managing employment relationships and formal consequence management mechanisms.<br>Interviews with workers, including contractors, indicate awareness of the company's human resources policies and procedures.<br>The evidence indicates that the company has adopted and implemented human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner consistent with national legislation and with the requirements of this chapter. |
| 3.1.2.1. | Critical. The operating company shall respect the rights of workers to freedom of association and collective bargaining. | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which outlines employees' entitlement to membership in trade unions and Workers' Committee. The Workers' Committee is a formal employee representative body established under Zimbabwean labour legislation to represent workers' interests in workplace matters, including labour conditions, occupational health and safety, grievances, and engagement with management. Members of the Workers' Committee are elected by employees through a voting process and are expected to represent the workforce independently of company management, but the committee does not replace a labour union. The Freedom of Association Procedure (Anglo American, April 2022), applicable to all employees and contractors at the mine site, clearly states that all employees are free to join and participate in industrial associations without discrimination, harassment, or victimization, in alignment with the Labour Act. Evidence of implementation includes the Workers' Committee Constitution (Anglo American, November 2019) for the Unki Mines |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Workers' Committee, signed by the Workers' Committee Chairman and Secretary, the Senior HR Manager, and the Ministry of Labour, as well as a Register of Employees Affiliated with Trade Unions (Valterra Platinum, December 2024–June 2025). For contractors, the company's Responsible Sourcing Standard for Suppliers (Valterra Platinum, May 2025) requires that contractors allow freedom of association. Supporting evidence includes a letter to Ironton Contractors (Ministry of Public Service, Labour and Social Welfare, June 2025) recognizing the elected Workers' Committee, and Workers' Committee meeting minutes (Mine Maintenance Services, March and May 2025; Unifreight, March 2025).<br><br>The company's efforts to inform workers of their rights are documented in attendance records of Ministry of Labour awareness sessions (Anglo American, October 2024), which informed a broad range of workers about their labour rights; an e-mail correspondence to all employees on the Labour Act Amendment Act and Gender-Based Violence and Harassment, Bullying and Victimization awareness sessions (Anglo American, August 2023); and a sample of induction forms (Anglo American, March 2025) listing the Workers' Committee structures, the Collective Bargaining Agreement, and the Labour Act as induction topics. Evidence of active facilitation includes quarterly internal memos (Anglo American, July and September 2024) issued by the Human Resources Manager to all employees, announcing upcoming recruitment exercises for two (2) national-level workers' associations (the Associated Mine Workers Union of Zimbabwe (AMWUZ) and the Zimbabwe Diamond and Allied Minerals Workers Union (ZDMWU)), and arranging transport for off-duty mine workers to |

| Req # | Requirement | Score | Basis for Rating |
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| | | | participate in voting for Workers' Committee candidates (Anglo American, October 2024).<br><br>Interviews with a sample of workers, including contractors, indicate awareness of union outreach activities on site, and some interviewees reported current union membership. Several workers stated that they had chosen not to join a union owing to the cost of dues relative to current wages. Interviews with some representatives of workers' unions indicate that access for organizing activities is structured and limited to designated areas, which some representatives consider restrictive.<br><br>The evidence indicates that the company has established procedures that formally recognize and support workers' rights to freedom of association and collective bargaining, and no evidence of retaliation or prohibition of union membership was identified. |
| 3.1.2.2. | Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms. | — | Not relevant. The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023) and confirms that Zimbabwe does not restrict workers from forming workers' organizations. |
| 3.1.2.3. | The operating company shall engage with workers' representatives and | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which sets out |

| Req # | Requirement | Score | Basis for Rating |
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| | workers' organizations and provide them with information needed for meaningful negotiation in a timely manner. | | employees' rights to form and join trade unions, establish Workers' Committees, and participate in collective bargaining. Internal procedures include the Freedom of Association Procedure (Anglo American, April 2022), applicable to all employees and contractors at the mine site, which states that employees are free to join and participate in industrial associations without discrimination, harassment, or victimization, in alignment with the Labour Act. Evidence of implementation includes the Workers' Committee Constitution for Unki Mines (Anglo American, November 2019), signed by the Workers' Committee Chairman and Secretary, the Senior HR Manager, and the Ministry of Labour, and a Register of Employees Affiliated with Trade Unions (Valterra Platinum, December 2024–June 2025), indicating the presence of organized workers' representation at the mine. Additional evidence includes the Responsible Sourcing Standard for Suppliers (Valterra Platinum, May 2025), which requires contractors to respect workers' rights to freedom of association and collective bargaining, and a letter from the Ministry of Public Service, Labour and Social Welfare (June 2025) recognizing the elected Workers' Committee at Ironton Contractors.<br><br>The evidence of engagement with workers' representatives includes minutes of Workers' Committee meetings (Anglo American, August 2024; January 2025; February 2025), which document regular meetings between management and elected worker representatives to discuss workplace issues, and Workers' Committee meeting minutes for contractors (Mine Maintenance Services, March and May 2025; Unifreight, March 2025). Also, evidence of active facilitation of workers' participation and information-sharing includes attendance records of Ministry of |

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| | | | Labour awareness sessions (Anglo American, October 2024) on labour rights; an email sent to all employees providing information on the Labour Act Amendment Act and GBV & HBV awareness sessions (Anglo American, August 2023); induction forms (Anglo American, March 2025) listing the Workers' Committee structures, the Collective Bargaining Agreement, and the Labour Act as induction topics; and a Workers' Committee transport memo (Anglo American, 25 October 2024) informing all employees that bus services have been arranged for off-duty or off-site employees wishing to participate in Workers' Committee elections, with information on the timetable, candidate nominations, and where to access updates on the elections on local noticeboards.<br><br>Interviews with a sample of workers and contractors, including Workers' Committee members, indicate that regular meetings are held between management and elected worker representatives to discuss workplace matters. Workers' representatives confirmed that engagement structures are operational and that information relevant to employment conditions and workplace issues is generally shared during these meetings.<br><br>The evidence indicates that the company engages with workers' representatives and workers' organizations through Workers' Committee, and trade unions, and that it provides information on labour rights, representation structures, and relevant processes in a manner that facilitates worker participation and representation in negotiations. |
| 3.1.2.4. | Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This | ● | The evidence reviewed includes the Workers' Committee Constitution for Unki Mines (Anglo American, November 2019), signed by the Workers' Committee Chairman and Secretary, the |

| Req # | Requirement | Score | Basis for Rating |
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| | 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. | | Senior Human Resources Manager, and the Ministry of Labour, which establishes the formal structure, roles, and functions of elected workers' representatives at the mine. Additional evidence includes minutes of Workers' Committee meetings held on site (Anglo American, 28 August 2024; 29 January 2025; 20 February 2025) and Workers' Committee meeting minutes for contractors (Mine Maintenance Services, March and May 2025; Unifreight, March 2025), documenting regular meetings between management and worker representatives in company facilities to discuss workplace issues and conditions. The evidence includes a Workers' Committee transport memo (Anglo American, 25 October 2024), informing all employees that bus services were arranged for off-duty or off-site employees wishing to come to the mine to vote for Workers' Committee candidates, and indicating that election-related information, including the timetable and list of candidates, would be shared and updated on workplace noticeboards. The evidence indicates that worker representatives are able to access company premises, use meeting spaces for representative functions, and make use of non-work areas such as noticeboards and designated election venues to communicate with workers.<br><br>Interviews with workers, contractors, and representatives confirm that the Workers' Committee uses on-site facilities to carry out its functions, such as a meeting hall to present issues to a larger group of workers or private rooms for confidential discussions.<br><br>The evidence, supported by interviews, indicates that the company provides workers' representatives with access to facilities at the mine, including meeting spaces and non-work areas used for elections and communication (such as noticeboards), in a manner that supports the exercise of their representative functions. |

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| 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. | ● | The evidence reviewed includes the Freedom of Association Procedure (Anglo American, April 2022), applicable to all employees and contractors at the mine site, which states that employees are free to join and participate in industrial associations without discrimination, harassment, or victimization. Evidence of implementation and recognition of independent worker representation includes the Workers' Committee Constitution for Unki Mines (Anglo American, November 2019), signed by the Workers' Committee Chairman and Secretary, the Senior HR Manager, and the Ministry of Labour; a Register of Employees Affiliated with Trade Unions (Valterra Platinum, December 2024–June 2025), indicating that employees are affiliated with recognized trade unions; and a letter from the Ministry of Public Service, Labour and Social Welfare (June 2025) recognizing the elected Workers' Committee at Ironton Contractors. Additional evidence includes minutes of Workers' Committee meetings held on site (Anglo American, 28 August 2024; 29 January 2025; 20 February 2025) and Workers' Committee meeting minutes for contractors (Mine Maintenance Services, March and May 2025; Unifreight, March 2025), which document regular meetings between management and worker representatives. Further evidence of facilitation of legitimate worker organizing includes quarterly internal memos issued by the Human Resources department inviting employees to participate in recruitment exercises for the Associated Mine Workers Union of Zimbabwe (AMWUZ) and the Zimbabwe Diamond and Allied Minerals Workers Union (ZDMWU), and a Workers' Committee transport memo (Anglo American, 25 October 2024) arranging bus services for off-duty or off-site employees to come to the mine to vote in Workers' Committee elections and directing workers to workplace noticeboards for updates on |

| Req # | Requirement | Score | Basis for Rating |
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| | | | candidates and the election process. No evidence was identified in the documents reviewed of company-established “house unions” or of communications intended to disparage legitimate trade unions, and no documentation was identified regarding sanctions imposed on workers’ organizations in connection with legal strikes.<br><br>Interviews with workers, contractors, and workers’ representatives, as well as managerial staff indicated that the company maintains neutrality regarding unionizing or worker-organizing efforts, does not produce or distribute material that discourages or disparages legitimate trade unions, and has not established or supported company-controlled unions that undermine legitimate worker representation. Interviews with managerial staff confirm that so far, no strikes have been organized by its workforce, and that the company would not impose sanctions on workers’ organizations participating in a legal strike.<br><br>The evidence, supported by interviews, indicates that the company recognizes and facilitates legitimate worker representation through independent trade unions, Workers’ Committees, and that it supports organizing and recruitment activities without establishing or promoting a company-controlled union. |
| 3.1.2.6. | Upon employment, the operating company shall:<br><br>a. Inform workers of their rights under national labour and employment law;<br><br>b. Inform workers that they are free to join a workers’ organization of their choosing without any negative | ● | The evidence reviewed includes the Freedom Of Association Procedure (Anglo American, April 2022), which sets out employees’ rights to join and participate in industrial associations without discrimination, harassment, or victimization and states that workers are free to choose their own representatives; a New Employee Induction Forms (Anglo American, 2024–2025), which are checklists signed by new employees confirming that they have been informed of company procedures, including those related to labour rights |

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| | consequences or retaliation from the operating company;<br><br>c. If relevant, inform workers of their rights under any applicable collective agreement; and<br><br>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. | | and worker representation structures, and Induction Forms (Anglo American, March 2025), which list the Labour Act (Chapter 28:01), the Mining Collective Bargaining Agreement, the Workers' Committee, and Workers' Committee structures as induction topics. Additional evidence includes an Understanding Your Rights Poster (Anglo American, no date), which directs workers to key labour governance instruments such as the Labour Act, the Mining Collective Bargaining Agreement, and the Amzim Code Of Conduct (Amzim Holdings, 2016)and explains where these documents can be accessed; and Ministry Of Labour Awareness Sessions Attendance Records (Anglo American, 2024), which document workers' participation in on-site labour-rights awareness sessions.; a Memorandum Regarding Trade Union Address (Anglo American, January 2023), which informs employees that a trade union will address workers on site; and a Trade Union Recruitment Memo (Anglo American, September 2024), which advises employees that the Associated Mine Workers Union Of Zimbabwe (AMWUZ) and the Zimbabwe Diamond And Allied Minerals Workers Union (ZDMWU) will be on site to conduct recruitment exercises and indicates where they will be stationed.<br><br>These documents indicate that, upon employment, workers are informed that:<br><br>a. they have rights under national labour and employment law;<br><br>b. they are free to join a workers' organization of their choosing without negative consequences or retaliation from the company;<br><br>c. there is an applicable Mining Collective Bargaining Agreement that governs certain terms and conditions of employment; and |

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| | | | d. the collective bargaining agreement and information on how to contact trade union or workers' representatives can be accessed through induction materials, posted information, and union recruitment notices.<br>Interviews with workers and Workers' Committees members confirm that they are informed of their rights as outlined in sub-requirements (a) through (c), and that they are provided with information on how to contact unions and Workers' Committee members (d).<br>The evidence, supported by interviews, indicates that the company has procedures and induction processes that inform workers, upon employment, of their rights under national labour law, their freedom to join workers' organizations, and the existence and basic content of applicable collective agreements and representation structures, in alignment with sub-requirements (a) through (c), and that workers are directed to where they can access the collective bargaining agreement and information on trade union or workers' representatives. |
| 3.1.2.7. | The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike. | | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which prohibits unfair labour practices, including discrimination or victimization of workers for exercising their rights to form and join trade unions and Workers' Committee, and the Freedom of Association Procedure (Anglo American, April 2022), which states that employees are free to join and participate in industrial associations without discrimination, harassment, or victimization. Additional evidence includes the Non Retaliation Procedure (Anglo American, May 2022), which provides guidance on the protection of whistleblowers |

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| | | | who report ethical concerns such as fraud, dishonesty, corruption, human rights violations (including gender-based violence, harassment, bullying and victimization) or other conduct inconsistent with company values and sets out measures to protect whistleblowers across all employees, contractors, suppliers, and stakeholders.<br><br>Additional evidence includes the Workers' Committee Constitution for Unki Mines (Anglo American, November 2019), signed by the Workers' Committee Chairman and Secretary, the Senior HR Manager, and the Ministry of Labour, which establishes the roles and protections of elected worker representatives, and a Register of Employees Affiliated with Trade Unions (Valterra Platinum, December 2024–June 2025), indicating that employees are affiliated with recognized trade unions while remaining employed at the mine. Additional evidence includes a letter from the Ministry of Public Service, Labour and Social Welfare recognizing the elected Workers' Committee at Ironton Contractors (June 2025) and minutes of Workers' Committee and Workers' Committee meetings (Anglo American and contractors, 2024–2025), which document regular meetings between management and worker representatives without reference to disciplinary action linked to participation in representative bodies. No documentary evidence was identified describing disciplinary measures, dismissal, or other sanctions applied to workers or workers' organizations in connection with participation in trade unions, Workers' Committee or collective actions.<br><br>Interviews with a sample of workers, including contractors, and worker representatives indicate that most interviewees do not experience discrimination, retaliation, or harassment related to |

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| | | | joining or participating in workers' organizations. The majority stated that they feel free to decide whether to join a union or participate in worker representation structures. A limited number of interviewees expressed concern about potential negative consequences associated with participation in workers' organizations, indicating a perception or fear of retribution, although no specific instances of disciplinary action or formal sanctions were substantiated during interviews.<br><br>Interviews with key staff indicated that no disciplinary actions, dismissals, demotions, or other adverse employment measures have been taken against workers for participating, or seeking to participate, in workers' organizations or lawful strike activity during the audit reference period.<br><br>The evidence, supported by interviews, indicates that the company has established legal and procedural safeguards that prohibit discrimination, victimization, and retaliation against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike.<br><br>The interviews indicate that the implementation of the company's non-retaliation and freedom of association safeguards may not be fully effective in all cases as some workers reported perceived or feared retribution in connection with participation in workers' organizations or related activities. |
| 3.1.2.8. | Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the | ◐ | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023) and the Mining Industry Collective Bargaining Agreement (CBA) signed between the Chamber of Mines of Zimbabwe and the Associated Mine Works |

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| | 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. | | Union of Zimbabwe, which establishes negotiated terms and conditions of employment applicable to the mining sector (principal agreement dated 1990, as amended, including amendments issued in September 2021). The CBA sets out sector-specific labour conditions and mutual obligations between employers and workers' representatives. An example of an Employment Contract (Anglo American, January 2025) references the Labour Act, indicating that the terms and conditions of employment are intended to be applied in alignment with the Mining Industry CBA and the Labour Act Chapter 28:01. Additional company procedures, such as the Freedom of Association Procedure (Anglo American, April 2022) and the Non Retaliation Procedure (Anglo American, May 2022), address workers' rights and protections that are not fully detailed in the sectoral collective bargaining agreement, indicating that the company has internal measures in place for issues covered by this IRMA chapter that go beyond the scope of the agreement. Supporting evidence reviewed includes timesheets for a sample of employees and contractors covering multiple months selected by the audit team. Across the sample reviewed, entries show uniform and standardized time values, with limited variation between days and shift start and finish times.<br><br>Interviews with a sample of workers, including employees and contractors, and union representatives indicate general awareness of the collective bargaining agreement. Most interviewees reported that certain provisions of the Labour Act (Chapter 28:01), particularly those related to working hours, meal breaks, rest periods between shifts, and payment terms, are not consistently implemented in practice; similar concerns were also reported by Workers' |

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| | | | Committee members as having been raised with management during recent committee meetings.<br>The evidence indicates that the company is a party to a collective bargaining agreement and subject to the Zimbabwe Labour Act, and that implementation of statutory and collectively agreed provisions is partial. The evidence also indicates that the company has established internal procedures that address workers' rights and protections in areas not specifically covered by the collective bargaining agreement.<br>The evidence reviewed, including the presence of uniform and standardized timesheet records, supported by interviews, indicates that while systems are in place to support compliance with labour requirements, implementation is not fully consistent across all areas. |
| 3.1.2.9. | The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labour and social security laws and regulations. | ◔ | The evidence reviewed includes the Recruitment and Selection Procedure (Anglo American, July 2023), which describes the process for filling vacancies and applies to both permanent and fixed-term positions. The procedure states that recruitment and selection are conducted in compliance with applicable labour legislation and the Mining Collective Bargaining Agreement (CBA). It further notes that for appointments lasting less than three (3) months, Human Resources will review alternatives to recruitment (e.g., reorganization or use of contractors). Further evidence includes the Mining Industry CBA, issued through the National Employment Council, which establishes sectoral minimum wage rates and basic conditions of employment for grades 1–13, and a circular dated 17 |

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| | | | April 2025, which confirms agreed minimum wage rates for the 2025 period.<br><br>Supporting evidence reviewed includes contracts for a sample of direct employees and contractors selected by the audit team. All sampled direct employees were engaged under permanent contracts. In contrast, all sampled contractor personnel were engaged under fixed-term contracts ranging from one (1) to three (3) months. Most contractor contracts referenced alignment with CBA wage rates and included provisions for leave, public holiday pay, and overtime, although the level of detail regarding labour and social security obligations varied. Only one (1) contractor contract explicitly referenced maternity and sick leave entitlements. Some contractor representatives indicated that fixed-term employees are not provided the same benefits as permanent employees. In the case of certain contractors, sampled one-month contracts did not specify salary amounts within the contract itself and did not explicitly reference compliance with labour or social security legislation. According to company information provided for the IRMA application (Valterra Platinum, 2025), approximately 48% of the total workforce consists of contractors.<br><br>Interviews with Human Resources personnel indicated that contractor personnel are typically engaged under fixed-term contracts of no less than six (6) months' duration. Workers interviewed confirmed that direct employees are generally employed under permanent contracts.<br><br>Several contractor workers reported being engaged under three-month contracts that are periodically renewed, with some individuals indicating that they have worked at the site for periods ranging from two (2) to nine (9) years under successive fixed-term |

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| | | | arrangements. A limited number of contractors reported that they were undergoing onboarding and had not yet received written contracts at the time of the interview. No worker representatives interviewed reported that short-term contracts were being used to undermine collective bargaining or to discourage union participation<br><br>The evidence, supported by interviews, indicates that the company engages its direct employees under permanent contracts aligned with the Mining Industry Collective Bargaining Agreement and applicable labour legislation. No evidence was identified of short-term contracts or other employment arrangements being used to interfere with or undermine collective bargaining agreements, worker organizing efforts, or union participation.<br><br>The evidence does not include sufficient details to confirm that the company has fully and consistently verified that contractor engagement practices address all applicable labour and social security laws and regulations, as contractor personnel are predominantly engaged under short-term fixed-term contracts, including cases of repeated renewals over extended periods. |
| 3.1.2.10. | The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which defines the conditions for legal strikes and lockouts and prohibits unfair labour practices, and the Unki Recruitment And Selection Procedure (Anglo American, no date), which describes the process for filling vacancies using standard employment contracts in compliance with applicable labour legislation and the Mining Collective Bargaining Agreement, without reference to hiring temporary workers to replace striking employees. Additional evidence includes |

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| | environmental control measures are maintained during a legal strike. | | the CBA of the Mining Industry (National Employment Council for the Mining Industry, no date), which establishes sectoral rules for the resolution of labour disputes and the conduct of collective bargaining; and the AMZIM Employment Code of Conduct (Amzim Holdings, 2016), which states that the company will comply with applicable labour and social security laws and resolve employment-related issues in accordance with legislation.<br><br>Interviews with key staff confirm that so far, no strikes have been organized by its workforce.<br><br>The evidence, supported by interviews, indicates that the company does not hire replacement workers to prevent, undermine, or break up a legal strike, to support a lockout, or to avoid negotiating in good faith. |
| 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. | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which prohibits discrimination in employment and requires equal treatment, the Discrimination (Employment and Occupation) Convention, 1958 (No. 111), and the Unki Recruitment and Selection Procedure 2023 (Anglo American, 2023), which states that recruitment must comply with the Labour Act and must not discriminate on grounds such as gender, race, age, disability or HIV status. Additional evidence includes internal vacancy adverts for HR Assistant, Ventilation Officer, and Geology Technician positions (Anglo American, 2024), which describe job-related qualifications and experience as selection criteria; interview summary forms for several technical positions, which record candidate scores and recommendations against predefined criteria; a Training Nomination Form that documents approvals for employee training; and a promotion |

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| | | | package for an employee, including a performance appraisal used to support the promotion decision. Further evidence includes the Group Policy on Bullying, Harassment and Victimisation (Anglo American, 2022), which prohibits abusive conduct at work, “Understanding Your Rights” materials and attendance registers for “Know your rights” sessions, which inform workers about their labour rights and available mechanisms, and an Payroll Summary (Anglo American, 2025) containing payroll data disaggregated by grade and gender that can be used to assess consistency of pay practices with non-discrimination requirements. Regarding contractors, the evidence includes a sample of job descriptions, which outline the selection criteria for candidates.<br><br>Interviews with a sample of workers, including contractors, indicated that recruitment, training, and promotion processes are generally perceived as fair and merit based. Most interviewees stated that hiring decisions were made through formal application and interview procedures and described day-to-day treatment as consistent across employees. Interviewees also reported that the terminations they were aware of followed established disciplinary procedures.<br><br>The evidence, supported by interviews, indicates that the company has established and implemented procedures, documentation, and awareness activities aimed at promoting equal opportunity and fair treatment and requires employment decisions to be based on inherent job requirements rather than personal characteristics. |

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| 3.1.3.2 | Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:<br>a. Targets or quotas mandated by law;<br>b. Targets developed through local agreements for the employment of local residents, Indigenous Peoples, or individuals who have been historically disadvantaged; or<br>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. | — | Not relevant. The evidence provided for 3.1.3.1 indicated that the company bases employment relationships on the principles of equal opportunity and fair treatment. |
| 3.1.3.3. | Critical. The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers. | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which states the employees' rights to fair labour standards and specifies that no person shall directly or indirectly use violence against or harass another person at work.<br>At the corporate level, the company has established a Recognizing and Responding to Domestic Violence Policy (Anglo American, April 2023), and a Policy on Bullying, Harassment and Victimisation (Anglo American, May 2022). These policies set out the company's commitment to employee safety, dignity, and inclusion, reinforcing a zero-tolerance stance toward bullying, harassment (including |

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| | | | sexual harassment), and victimisation. Both documents outline how incidents can be reported and managed, supported by detailed site-level procedures described in the Disciplinary Hearing and Grievance Handling Procedure (Anglo American, May 2022). Additional evidence includes the Human Rights Policy (Anglo American, October 2021), which commits the company to upholding internationally recognised human rights, which include safeguards against exploitation. A specific online hub, Living with Dignity, provides information on dignity-related harms and mechanisms for reporting such issues, as evidenced by a Training Session Invite (Anglo American, June 2024) and a screenshot of the website. The company's efforts to raise awareness are documented in Training Attendance Registers (Anglo American, September 2024 and June 2025) for sessions on gender-based violence and harassment and behavioural violations, and an Attendance Report and Presentation on Labour Act Amendments (Anglo American, no date), which informed workers that sexual harassment and gender-based violence are recognized as criminalized and unfair labour practices under the Labour Act. Additional awareness materials include two (2) informational Flyers/Posters on Gender-Based Violence (Anglo American, 2024). Evidence of implementation includes a sample of investigation records (Anglo American, 2024–2025) relating to reported misconduct, including sexual harassment, which document investigations conducted and disciplinary actions taken. Documentation from a sample of contractors (2024–2025) indicates that harassment-related policies and grievance mechanisms are also communicated and supported through training within contractor workforces. |

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| | | | Interviews with a sample of workers and contractors, including female employees, confirmed awareness of the company's policies and procedures for preventing harassment, intimidation, and exploitation. Interviewees reported receiving training on respectful workplace behaviour and indicated that they had been informed of how to use the grievance mechanism to raise issues related to harassment or intimidation, including the option to do so anonymously.<br><br>The evidence, supported by interviews, indicates that the company has established and implemented measures to prevent and address harassment, intimidation, and exploitation, particularly concerning female workers. |
| 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. | — | Not relevant. There is no evidence of past or current collective dismissals associated with the mining project that would require analysis at the time of the audit. |

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| 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. | — | Not relevant. There is no evidence of past or current collective dismissals associated with the mining project that would require analysis at the time of the audit. |
| 3.1.5.1. | Critical. The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:<br><br>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; | ◔ | The evidence reviewed includes the industry-wide Collective Bargaining Agreement (CBA) (National Employment Council, 2009), Employment Code of Conduct (Anglo American, May 2016), Whistleblowing Policy (Anglo American, November 2022), Policy on Bullying, Harassment and Victimisation (Anglo American, May 2022), and site-level Procedures on Disciplinary Hearings and Grievance Handling and Non-Retaliation (Anglo American, May 2022).<br><br>These policies and procedures collectively describe the company's framework for worker grievance reporting and resolution. The |

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| | b. Shall allow for anonymous complaints to be raised and addressed;<br><br>c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and<br><br>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. | | framework is aligned with the national CBA and the Employment Code of Conduct and provides that:<br><br>a. An appropriate level of management must be present during grievance handling, following the escalation guidelines in the Code of Conduct and Whistleblowing Policy. Grievances must be addressed promptly within two (2) days of filing through a transparent process that provides timely feedback at each step and ensures non-retaliation, as stated in the Whistleblowing Policy, Disciplinary Hearing and Grievance Handling Procedure, and Non-Retaliation Procedure.<br><br>b. Workers may submit complaints anonymously through various channels, including the YourVoice reporting tool (online or by phone), as described in the Whistleblowing Policy. This applies to all employees and contractors.<br><br>c. Workers' representatives may be present during hearings, if requested by the aggrieved party, as provided for in the Disciplinary Hearing and Grievance Handling Procedure.<br><br>d. Workers retain access to judicial or administrative remedies, or to grievance mechanisms established under collective agreements, as provided for in the Disciplinary Hearing and Grievance Handling Procedure.<br><br>Further evidence includes a Grievance Register (Valterra Platinum, September 2025) showing six (6) grievances logged since 2023, which are all recorded as resolved, indicating that the mechanism is operational and used in practice. Supporting evidence includes a sample of Appeal Hearing Outcomes and Disciplinary Hearing Minutes (Anglo American, 2023–2024), which document implementation of grievance follow-up, management participation, |

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| | | | transparency, involvement of workers' representatives, and access to external remedies (requirements a, c, and d). The company also provides worker awareness and training on workers' rights and grievance mechanisms, as recorded by Training Session Invites, Attendance Records (Anglo American, June 2024), and a screenshot of the "Living with Dignity" online hub, which provides an overview of how to file grievances using YourVoice.<br><br>For contractors, additional documents were reviewed, including Grievance Procedures (MMS, no date; Bulwark, no date), which reference either the national CBA or the Mining Code of Conduct, and Sandvik's Harassment Policy (Sandvik, February 2025). Supporting materials include Training Attendance Registers for Grievance Procedure (Bulwark, June 2023) and Non-Retaliation Procedure (MMS, March 2024).<br><br>Interviews with managerial staff indicate that the grievance mechanisms are designed and implemented in alignment with sub-requirements (a) to (d). Interviews with workers, including contractors, indicate they are aware of and have access to the grievance mechanisms, with timely resolutions and some reported being aware of options to remain anonymous. A few of the interviewees reported that they do not feel comfortable reporting grievances due to fear of retribution.<br><br>The evidence, supported by interviews, indicates that the company provides grievance mechanisms for workers and contractors that align with sub-requirements (b) through (d), and that its design and implementation substantially align with sub-requirement (a).<br><br>The interview evidence indicates that the grievance mechanisms are not fully effective in practice in ensuring that grievances can be |

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| | | | raised consistently without apprehension of potential retribution (a), as some workers expressed concern that submitting a grievance, whether through formal mechanisms or directly with supervisors or managers, could result in retribution. |
| 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. | ● | The evidence reviewed includes sampled Induction Forms (Anglo American and Valterra Platinum, 2024–2025), signed by both the employee and the facilitator, which list onboarding topics such as workplace conduct, bullying and harassment, gender-based violence, and the “YourVoice/Speak Up” reporting channel. A Recruitment Checklist (Valterra Platinum, 2025) records completion of induction as part of the hiring process. Additional materials, including a “How to Report When Using YourVoice” guide and a “When to Use YourVoice” poster, outline reporting procedures and indicate that concerns may be submitted anonymously. A screenshot of the company’s internal Engage application shows that the “Living With Dignity Hub” and “Your Voice” functions are accessible through the People & Human Resources menu, demonstrating availability through an internal digital platform.<br><br>Interviews with a sample of workers, including contractors, confirmed that they are informed about the grievance mechanism during recruitment and induction training, and that the available channels are well known and easily accessible to all employees and contractors. Interviewees also confirmed that they understand how to raise grievances, including anonymously. Contractors stated that they can use Valterra Platinum’s grievance channel in addition to their employers’ mechanisms. On-site observations confirmed that information on accessing the various grievance channels is posted on notice boards across the mine site. |

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| | | | The evidence, supported by interviews, indicates that the company informs workers of the grievance mechanism at the time of recruitment and makes it easily accessible to them. |
| 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. | ◔ | The evidence reviewed includes the Disciplinary Hearing and Grievance Handling Procedure (Anglo American, May 2022), which documents the formal grievance channels, including anonymous reporting options consisting of (1) safety complaint books; (2) suggestion boxes; (3) a dedicated e-mail address; and (4) a dedicated phone number. Additional evidence includes the Grievance Register (Anglo American and Valterra Platinum, 2023–2025), which records worker grievances with fields such as reference number, date, responsible department, and closure status. The register indicates that six (6) grievances have been raised since the beginning of 2023. Records in ERNAVIGATOR (Anglo American and Valterra Platinum, 2023–2025) show that these cases are entered into the electronic system where additional details are documented, including the nature of the complaint, investigation steps, decisions, and follow-up actions. These documents demonstrate that formally raised grievances and related management actions are recorded in dedicated registers and systems.<br><br>Interviews with a sample of workers, including contractors, indicate that grievances are most commonly raised directly with supervisors or submitted through the anonymous grievance books available throughout the site. |

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| | | | The evidence indicates that the company maintains records of formally submitted grievances and documents actions taken to address or resolve them.<br><br>The evidence does not include details to confirm that grievances raised verbally or through informal channels, such as those raised directly with supervisors, are consistently recorded and tracked. |
| 3.1.6.1. | The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers. | ● | The evidence reviewed includes the Code of Conduct (Anglo American, 2016), which sets out rules of conduct, types of offences and possible disciplinary measures applicable to employees at Unki Mines. Further evidence includes the Disciplinary Hearing and Grievance Handling Procedure (Anglo American and Valterra Platinum, 2022), which describes the steps for lodging and handling disciplinary matters and grievances, including the roles of supervisors, Human Rights and workers' representatives, and applies to all employees. Supporting evidence includes sampled Induction Forms for new employees (Anglo American and Valterra Platinum, 2024–2025), which list the Code of Conduct, Labour Act and Collective Bargaining Agreement as induction topics and are signed by the worker and the inductor, indicating that these documents are introduced at hiring. Additionally, a Code of Conduct Training Register (Anglo American, 2024) records employees' participation in training on the Code, and a Workers' Committee Files Receipt Acknowledgement (Unki Mines, 2024) indicates that the Workers' Committee received hard-copy files containing the Labour Act, Mining CBA, Code of Conduct and the Disciplinary & Grievance Procedure for reference. |

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| | | | The evidence indicates that the company has established and documented disciplinary procedures and that these are made available to all workers. |
| 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. | ● | The evidence reviewed includes the Procedure on Disciplinary Hearings and Grievance Handling (Anglo American, 2022), which states that disciplinary measures are implemented in accordance with the Code of Conduct (Anglo American, 2016). The Code outlines a graduated system of sanctions, including verbal warnings for minor offenses and written warnings or dismissal for more serious misconduct. Accountability Framework training materials further describe expectations for fair, consistent, and proportionate corrective action and emphasize maintaining a psychologically and physically safe work environment, free from punitive or retributive treatment. Supporting evidence includes a sample of Disciplinary Hearing Records of Proceedings and Outcomes of Appeals (Anglo American, 2023–2025), which indicate that disciplinary actions were implemented in accordance with established procedures.<br><br>Interviews with a sample of workers, including contractors, indicate that in cases involving harassment or similar grievances, the company applied its established disciplinary procedures, including termination where deemed appropriate. No interviewees reported instances of corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical, or verbal abuse, coercion, or intimidation in connection with disciplinary actions.<br><br>The evidence, supported by interviews, indicates that the company does not permit the use of harsh or degrading treatment, physical |

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| | | | or verbal abuse, coercion, or intimidation of workers during disciplinary actions. |
| 3.1.6.3. | The operating company shall keep records of all disciplinary actions taken. | ◔ | The evidence reviewed includes the Employment Code of Conduct (Anglo American, 2016), which defines categories of misconduct and establishes a graded system of disciplinary measures (verbal warning, written warning, final written warning, dismissal) to be applied and recorded in accordance with the Code. Additional evidence includes the Disciplinary Hearing and Grievance Handling Procedure (Anglo American, 2022), which states that disciplinary and grievance processes are conducted under the Code and contains a Record Control table identifying required documentation for each case (disciplinary complaint form, statements, notice of hearing, hearing outcome, appeal documentation, suspension and postponement letters, grievance outcome form), as well as assigned responsibilities, storage location (Human Rights Administration Office), and a five-year retention period. Supporting evidence includes a sample Navigator Reports extract for the period 1 January 2022 to 15 July 2025 (Anglo American and Valterra Platinum, 2025), which shows anonymized entries of disciplinary cases logged in the Human Rights system, including type of offense, outcome, and date.<br><br>The evidence indicates that the company maintains both physical case files and electronic records of disciplinary actions taken in response to formally submitted grievances.<br><br>The evidence does not include details to confirm that disciplinary actions are taken and documented in response to informally raised grievances (e.g., raised verbally or directly with supervisors). |

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| 3.1.7.1. | The operating company shall document the ages of all workers. | ● | The evidence reviewed includes the Employee Age Profile (Valterra Platinum, 2025), which documents the current age of all hired employees, including their age at the time of hiring and corresponding government-issued identification documents, and a sample of contractor personnel age records. The company indicated that, during the recruitment process, candidates are required to present a national identification document showing their personal information, which is used to verify age before employment. Additional evidence includes the Recruitment and Selection Procedure (Anglo American, June 2023) and the Responsible Sourcing Standard for Suppliers (Valterra Platinum, June 2025), both of which explicitly prohibit the use of child labour, including among contractors and suppliers.<br><br>Interviews with a sample of workers, including contractors, confirm that government-issued identification document checks and age verification are a part of the onboarding process.<br><br>The evidence, supported by interviews, indicates that the company has implemented processes to verify and maintain information on the ages of its workers. |
| 3.1.7.2. | Critical. Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances). | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which prohibits the employment of persons under 18 years for work likely to jeopardize their health, safety, or morals, and establishes a minimum age of 16 for vocational work or apprenticeships.<br><br>At the site level, the Recruitment and Selection Procedure (Anglo American, June 2023) specifies a minimum employment age of 18, and a minimum apprenticeship age of 16 with parental or legal |

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| | | | guardian consent, in alignment with the Labour Act. ID checks are conducted as part of pre-employment screening, as supported by a sample of an employee ID card, and the Employee Age Profile (Valterra Platinum, no date) records employees' birth dates and ages, with the youngest employee documented as 18 years old.<br><br>The company's Responsible Sourcing Standard for Suppliers (Valterra Platinum, May 2025) prohibits child labour in line with national legislation. A sample of employee age records from three (3) contractors (Trentyre, no date; Tsebo, no date, and MMS, April 2025) indicates that no workers under the age of 18 are employed. Two Workplace Risk Assessment and Control documents (Anglo American, April 2025), specific to the recruitment of unskilled labour and catering/facility management services, demonstrate that the company has implemented a systematic framework to identify and mitigate risks related to forced and child labour during recruitment, with particular attention to vulnerable positions and workers.<br><br>Interviews with workers, including contractors, indicate that age verification is a part of their onboarding process, and that no people under the age of 18 are employed and this was confirmed by managerial staff. During the on-site audit, there was no sign that minors performed hazardous work.<br><br>The evidence, supported by interviews and on-site observations, indicates that the company and its contractors do not employ persons under 18 years of age for any type of work, including hazardous work. |
| 3.1.7.3. | Critical. The minimum age for non-hazardous work shall be 15, or the | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which prohibits the |

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| | minimum age outlined in national law, whichever is higher. | | employment of persons under 18 years for work likely to jeopardize their health, safety, or morals, and establishes a minimum age of 16 for vocational work or apprenticeships.<br><br>At the site level, the Recruitment and Selection Procedure (Anglo American, June 2023) specifies a minimum employment age of 18, and a minimum apprenticeship age of 16 with parental or legal guardian consent, in alignment with the Labour Act. ID checks are conducted as part of pre-employment screening, supported by a sample employee ID card, and the Employee Age Profile (Valterra Platinum, no date) records employees' birth dates and ages, with the youngest employee documented as 18 years old.<br><br>The company's Responsible Sourcing Standard for Suppliers (Valterra Platinum, May 2025) prohibits child labour in line with national legislation. A sample of employee age records from three (3) contractors (Trentyre, no date; Tsebo, no date, and MMS, April 2025) indicates that no workers under the age of 18 are employed. Two Workplace Risk Assessment and Control documents (Anglo American, April 2025), specific to the recruitment of unskilled labour and catering/facility management services, demonstrate that the company has implemented a systematic framework to identify and mitigate risks related to forced and child labour during recruitment, with particular attention to vulnerable positions and workers.<br><br>Interviews with workers, including contractors, indicate that age verification is a part of their onboarding process, and that no persons under the age of 18 are employed, and this was confirmed by managerial staff. During the on-site audit, there was no evidence that minors were working on site. |

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| | | | The evidence, supported by interviews and on-site observations, indicates that the company and its contractors do not employ persons under 18 years of age for any type of work, including non-hazardous work. |
| 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 labour authority, or if that is not possible, by the company itself. | — | Not relevant. The evidence reviewed under requirement 3.1.7.4, supported by interviews and on-site observations, indicates that the company does not employ individuals under 18 years of age. |
| 3.1.7.5. | If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:<br>a. The child shall be removed immediately from his or her job; and<br>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 | — | Not relevant. The evidence reviewed under requirement 3.1.7.4, supported by interviews and on-site observations, indicates that the company does not employ individuals under 18 years of age. |

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| | welfare of the child and the financial situation of the child's family. | | |
| 3.1.7.6. | Where there is a high risk of child labour 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. | — | Not relevant. According to the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), an internal mechanism used to manage social and human rights risks across the mine's operations, there is no high risk of child labour in the mine's supply chain. |
| 3.1.8.1. | Critical. The operating company shall not employ forced labour or participate in the trafficking of persons. | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which prohibits forced labour. At the site level, the Recruitment and Selection Procedure (Anglo American, June 2023) specifies that all labour must be engaged voluntarily and compensated according to the work performed. The procedure explicitly states that forced labour is not permitted by the company or its contractors, a commitment reinforced by the Responsible Sourcing Standard for Suppliers (Valterra Platinum, May 2025). |

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| | | | Supporting evidence includes samples of Employment Contracts (Anglo American, April 2025), which document consensual agreements, and Job Adverts (Anglo American, 2025), which demonstrate that individuals are able to apply voluntarily. The Rules of Life Policy (Valterra Platinum, May 2025) states that employees may refuse work under certain circumstances, such as unsafe conditions, and a sample Resignation Letter (Anonymous worker, April 2025) illustrates voluntary termination of employment. Employee consent for overtime is documented through Overtime Pre-Authorisation and Consent Forms (Valterra Platinum, June 2025).<br><br>For contractors, a sample Service Level Agreement (Tsebo, June 2025) prohibits the forced trafficking of persons. Two Workplace Risk Assessment and Control documents (Anglo American, April 2025), specific to the recruitment of unskilled labour and catering/facility management services, demonstrate that the company has implemented a systematic framework to identify and mitigate risks related to forced and child labour during recruitment, with particular attention to vulnerable positions and workers.<br><br>On-site observations and interviews with employees and contractors confirmed that the company does not employ forced labour or participate in the trafficking of persons.<br><br>The evidence, supported by interviews, indicates that the company and its contractors do not employ forced labour or engage in the trafficking of persons. |
| 3.1.8.2. | Where there is a high risk of forced or trafficked labour in the mine's supply | — | Not relevant. According to the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), an |

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| | chain, the operating company shall develop and implement procedures to monitor it suppliers to determine if forced labour or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter. | | internal mechanism used to manage social and human rights risks across the mine's operations, there is no high risk of forced or trafficked labour in the mine's supply chain. |
| 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. | ◐ | The evidence reviewed includes the 2025 wage circular issued by the National Employment Council (NEC) for the Mining Industry (17 April 2025), which establishes minimum basic wages by grade for the mining sector, and an internal "Unki vs NEC Rates 2025" comparison table (Anglo American, 2025), which shows that Unki's basic wage rates for grades A3 to C5 are consistently higher than the corresponding NEC minimum rates. The evidence also includes the 2024 Reference Value Update Report: Living Wage Report for Rural Zimbabwe, published by the Anker Research Institute, which sets a gross living wage reference of USD 259 per month. A disaggregated payroll summary provided by the company for 2025 contains payroll data by grade and gender and supports consistency of wage application across worker groups. Supporting evidence reviewed includes contracts and payslips for a sample of workers and contractors, indicating that wages are paid partly in USD and partly in Zimbabwean dollars (ZWD). Direct employees |

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| | | | reported receiving approximately 75–85% of wages in USD, with the remainder paid in ZWD. Contractors reported receiving a significantly higher proportion in ZWD (approximately 50–85%). Due to ZWM currency instability and exchange rate volatility against the USD, the effective value of wages received may be reduced upon conversion to USD, particularly when informal exchange mechanisms are used. There is no single consistently applied conversion rate between ZWD and USD, and exchange rates fluctuate, meaning the purchasing power may vary. A sample of contractor payslips selected by the audit team indicates that although salaries are generally stated in USD and aligned with NEC minimum rates, partial payments in ZWD introduce variability in the effective value of wages received, which does not confirm that the effective value of wages consistently meets applicable minimum requirements.<br><br>Interviews with key staff clarified that exchange-rate volatility and the absence of a single, consistently applied conversion rate pose challenges in comparing USD-denominated wage agreements with partially ZWD payments.<br><br>Interviews with workers, including contractors, confirmed that most interviewees are paid according to their grade and in alignment with the collective bargaining agreement. However, some contractors reported that they are not paid in accordance with their assigned grade and that concerns raised with their employer have remained unresolved. Some contractors also reported delayed payment of mandatory pension contributions, without retroactive adjustment. In addition, several contractors expressed concern regarding the proportion of wages paid in ZWD and the effective devaluation of their compensation. Some contractors reported that, |

| Req # | Requirement | Score | Basis for Rating |
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| | | | due to currency conversion losses, their effective earnings fall below applicable minimum wage requirements.<br>The evidence indicates that the company pays its direct employees' wages that meet or exceed applicable legal minimums, collective-agreed rates, and living-wage benchmarks, and that contractual wage rates are generally aligned with applicable legal minimum wages.<br>The evidence, supported by interviews, does not include sufficient detail to confirm that the effective value of contractor wages consistently meets or exceeds applicable legal minimum wages, collectively agreed rates, or a living wage, due to the structure of wage payments, exchange-rate variability, and reported gaps in statutory pension contributions. |
| 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. | ◐ | The evidence reviewed includes the Collective Bargaining Agreement of the Mining Industry – SI 152 of 1990 (National Employment Council for the Mining Industry), which sets out conditions of employment in the mining sector, including provisions that overtime and work performed on public holidays must be remunerated at premium rates above normal wage. At site level, the Paid Public Holiday Remuneration Procedure (Unki Mine, version 2.0, January 2024) states that work performed during a public holiday shall be paid in accordance with clauses 15 and 16 of SI 152 of 1990 and section 14C(3) of the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), and provides an example demonstrating payment at double the normal rate for public holiday work and identifies overtime forms as controlled records. Additional evidence includes a sample Earnings and Deductions Report for 2025, which lists employees' basic pay, overtime earnings, |

| Req # | Requirement | Score | Basis for Rating |
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| | | | and deductions, as well as two (2) payslips for 2025 that show basic salary, recorded overtime hours, and identify overtime forms as controlled records. Supporting evidence reviewed includes contracts and payslips for a sample of contractors selected by the audit team, indicating that overtime is generally paid at 1.5 times the normal rate and public holiday work at 2 times the normal rate. A review of time sheets of several contractors indicates that working hours are tracked, although entries are rounded to full hours, and most records reviewed do not reflect significant deviations from regular working hours.<br><br>Most direct employees and contractors interviewed confirmed that they receive overtime payment. However, some direct employees and contractors reported that they do not consistently receive payment for overtime worked, and while compensatory time off is sometimes promised, operational constraints often prevent them from taking such leave before it expires.<br><br>The evidence indicates that the company has collective bargaining provisions and internal procedures that require overtime and public holiday work to be remunerated at premium rates above the regular wage, and that sample payroll records show overtime hours paid at higher rates than basic pay.<br><br>The evidence, supported by interviews, does not include details to confirm that overtime hours worked by direct employees and contractors are consistently remunerated in practice. |
| 3.1.9.3. | All workers shall be provided with written and understandable information about wages (overtime | ◐ | The evidence reviewed includes a Contract of Employment template for a direct employee (Anglo American, 2024), which provides written information on basic salary, grade, allowances, |

| Req # | Requirement | Score | Basis for Rating |
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| | rates, benefits, deductions and bonuses) before they enter employment, and for the pay period each time they are paid. | | overtime eligibility, benefits, deductions, and pay frequency. Sample payslips for 2025 show information for each pay period, including basic pay, overtime, allowances, statutory and other deductions, and net pay, indicating that wage components are itemized in writing. An induction training package (Anglo American, 2025) lists pay and benefits, among other topics, as part of the terms and conditions of employment covered for new employees. Additional evidence includes a “Minimum HR and Social Requirements Checklist” for contractors (Valterra Platinum, no date), which requires contractors to comply with the applicable collective bargaining agreement and National Employment Council provisions regarding payslips, hours of work, contracts of employment, minimum rates of pay, and other benefits. The checklist further requires that workers have written contracts and receive payslips in line with labour rights requirements. Supporting evidence reviewed includes employment contracts for a sample of contractors selected by the audit team.<br><br>Interviews with workers, including contractors, indicate that they receive information on pay, benefits, deductions, and bonuses (where applicable) prior to employment. Some direct employees reported that they have not received payslips since the company’s transition from Anglo American to Valterra Platinum, while others noted that payslips are provided only upon request. Several direct employees stated that they receive their payslips only after their salaries are credited to their bank accounts, limiting their ability to verify deductions in advance, although most confirmed that deductions are generally explained. Contractors reported receiving payslips regularly, and the majority indicated that they understand the deductions. A few contractors reported that inquiries about |

| Req # | Requirement | Score | Basis for Rating |
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| | | | unclear deductions were not answered satisfactorily by their employer.<br><br>The evidence, supported by interviews, indicates that the company provides direct employees with written employment contracts, payslips, and induction materials, that there are contractor oversight mechanisms intended to ensure that workers receive written information about wages, overtime rates, benefits, deductions, and bonuses prior to employment; and that contractors receive such information before starting work and receive payslips for each pay period.<br><br>The evidence does not include details or documentation confirming that direct employees consistently receive payslips in a timely manner for each pay period, nor that contractors consistently receive explanations of deductions applied to their wages. |
| 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). | ● | The evidence reviewed includes a sample pay slip for a direct employee (Unki, June 2025), which records the employee's bank name, earnings, deductions, and net pay, indicating that wages are processed through a formal payroll system and paid via bank transfer. Additional evidence includes payslips for workers employed by six (6) site-based contractors selected by the audit team, which demonstrate deductions and net pay in a standard payroll format, consistent with payment through normal banking channels rather than informal or in-kind arrangements. Employment contracts and payroll documentation reviewed for sampled direct employees and contractor workers further support the conclusion that wages are administered through formal systems. |

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| | | | Interviews with key HR staff and a sample of workers, including contractors, confirmed that salaries are deposited into personal bank accounts. Interviewed workers indicated that they find this payment method reasonable.<br><br>The evidence, supported by interviews, indicates that the company and sampled contractors pay wages through formal payroll systems, generally via bank transfer, in a manner that is reasonable for workers. |
| 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:<br><br>a. Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or<br><br>b. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award. | ● | The evidence reviewed includes the Labour Act Chapter 28:01 (Zimbabwe Parliament, last revised 2023), which regulates permissible deductions from wages, including statutory deductions and deductions authorised under law or collective agreements. At the company level, the Employment Code of Conduct and the Disciplinary Hearing and Grievance Handling Procedure (Anglo American, 2022) describe disciplinary processes and outcomes such as warnings, suspensions and dismissal, and refer to compliance with the Labour Act and applicable collective agreements. A sample suspension letter for a mine employee (Valterra Platinum, June 2025) states that the worker is "suspended from work... pending an investigation" and explicitly notes that the suspension "is on full pay and benefits," indicating that suspension as a disciplinary measure does not involve wage deductions. Additional evidence includes payroll and a salary deduction codes list (Anglo American, 2025) and sample payslips and earnings-and-deductions reports reviewed for 2025, which show statutory deductions (tax, social security, and pension) and other standard items, and do not identify deductions described as disciplinary penalties in the records reviewed. Supporting evidence reviewed includes payslips for a sample of |

| Req # | Requirement | Score | Basis for Rating |
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| | | | contractors selected by the audit team, which do not include any wage deductions connected to disciplinary measures.<br><br>Interviews with key HR personnel confirmed that the company does not apply wage deductions as a form of disciplinary action. Disciplinary measures are limited to verbal or written warnings and, when necessary, dismissal. Interviews with a sample of workers, including contractors, also indicated that no deductions are made from their paychecks as a disciplinary measure.<br><br>The evidence, supported by interviews, indicates that the company's disciplinary procedures and suspension practices rely on measures other than wage deductions and that the payroll records reviewed do not show deductions described as disciplinary penalties. |
| 3.1.10.1. | The operating company shall ensure that:<br><br>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;<br><br>b. Workers are provided with at least 24 consecutive hours off in every 7-day period; and | ◐ | The company operates in Zimbabwe, where the Labour Act Chapter 28:01 and the Collective Bargaining Agreement for the Mining Industry establish standard hours of work, entitlements to weekly rest, and conditions under which overtime may be performed and paid. Site-level procedures reviewed include the Fatigue Management Procedure (Anglo American, 2021), the Fatigue Bowtie risk assessment, the Overtime Procedure (Anglo American, October 2023), the Leave Regulations Policy (Anglo American, 2023), the CONTOPS Agreement (Anglo American, 2010), which operationalise working-time and overtime requirements at the mine.<br><br>These documents, and also the Mining Industry CBA, establish that:<br><br>a. Regular working hours and work shifts are based on an eight-hour day and 48-hour week, with shift patterns managed so that |

| Req # | Requirement | Score | Basis for Rating |
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| | c. Overtime is consensual, and limited to 12 hours a week.<br><br>d. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if:<br><br>i. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and<br><br>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. | | average regular hours over a multi-week period do not exceed these limits;<br><br>b. Workers are entitled to at least 24 consecutive hours of rest within every seven-day period, as reflected in the Leave Regulations Policy and illustrated in sample work schedules for the concentrator;<br><br>c. Overtime must be authorised in advance, recorded on pre- and post-overtime forms, and is described as voluntary and subject to limits consistent with a maximum of 12 hours per week; and<br><br>d. Where extended working hours may occur, the Fatigue Management Procedure and associated Fatigue Bowtie describe a risk-management process for longer shifts that includes consultation with workers' representatives and the use of controls to manage health, safety and welfare risks. Supporting records include completed and approved pre- and post-overtime forms, overtime training registers, communications on overtime to different departments, a completed and approved leave form, and a concentrator work schedule, which provide examples of how these procedures are implemented in practice. For contractors, the Minimum HR and Social Requirements checklist requires contractor companies to comply with the Labour Act, the Mining Industry CBA and NEC provisions on working hours, rest days and overtime, and to maintain contracts and records consistent with these requirements.<br><br>Interviews with a sample of workers, including contractors, indicate that:<br><br>a. Reported regular working hours generally range between 8 and 12 hours per day, depending on contract terms and job function. |

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| | | | Some interviewees described work schedules that may exceed an average of 48 hours per week. Several workers also noted that, when overtime and transportation schedules are considered, they may be away from home for approximately 15 to 16 hours on workdays.<br><br>b. Interviewees reported receiving at least 24 consecutive hours of rest within each seven-day period. Described work schedules include patterns such as 5 days on and 2 days off, 6 days on and 1 day off, and rotating cycles of 4 days on and 3 days off.<br><br>c. Most workers indicated that overtime is consensual and typically limited to approximately 12 hours per week. However, some underground workers reported working additional overtime on most shifts, generally 1 to 2 hours per day. Several interviewees indicated that extended shifts may result in missed scheduled transportation, requiring alternative arrangements at personal cost and leading to delayed arrival home.<br><br>Some interviewees, particularly those working underground, reported that overtime may be associated with personnel shortages or operational planning constraints. Workers' Committee representatives similarly identified overtime levels as an ongoing concern affecting certain worker groups.<br><br>The evidence indicates that the company has established legal, collective bargaining agreements, and site-level procedures intended to ensure compliance with working hours, rest periods, and overtime requirements.<br><br>The evidence reviewed does not include sufficient records demonstrating systematic monitoring and enforcement to ensure |

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| | | | that working hours and overtime limits are consistently applied across all employees and contractors. |
| 3.1.10.2. | Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:<br>a. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and<br>b. A maternity leave period of no less than 14 weeks. | — | Not relevant. The company operates in Zimbabwe, where national labour legislation includes provisions for worker leave, including maternity leave (Labour Act - Chapter 28:01, Section 14A and 18). |

## Chapter 3.2—Occupational Health and Safety

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 85% |
| Chapter Score Basis | 39 out of 46 possible points |

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| 3.2.1.1. | The operating company shall implement a health and safety management system for measuring | ● | The evidence reviewed includes a Safety, Health and Environment (SHE) Management Systems Manual (Anglo American, November 2024), the SHE Way Standard AA TS 018 (Anglo American, |

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| | and improving the mining project's health and safety performance. | | December 2024), Total Health Standard AA TS 018 (Anglo American, February 2024), and the SHE Policy in English, Shona and Ndebele (Valterra Platinum, July 2025), which form the framework of the site's occupational health and safety (OHS) management system. The system is aligned with ISO standards for Environmental Management and OHS Management as indicated by Certificates of Registration for ISO 14001:2015 and ISO 45001:2018 (BSI, August 2024). An Integrated SHE Monitoring, Evaluation and Analysis Plan for 2025 (Anglo American, no date) defines measurable parameters, monitoring methods, applicable standards or legal requirements, frequencies, and responsible persons for identified hazard and risk categories. The plan further establishes the methods, frequency, and responsibilities for the analysis and evaluation of performance.<br><br>Implementation of the SHE management system is supported by the SHE Management Systems Manual and a set of procedures, such as Leadership and Commitment (UNK-MIN-SHE-PRO-0001, Anglo American, July 2023), Roles, Responsibility, Authority and Resources (UNK-MIN-SHE-PRO-0002, Anglo American, June 2023), Communication, Consultation and Participation (UNK-MIN-SHE-PRO-0008, Anglo American, January 2025), Hazard and Aspect Identification (UNK-MIN-SHE-PRO-0004, Anglo American, September 2023), Legal and Other Requirements (UNK-MIN-SHE-PRO-0005, Anglo American, October 2022), SHE Audits (UNK-MIN-SHE-PRO-0021, Anglo American, October 2022), Performance Measurement and Monitoring (UNK-MIN-SHE-PRO-0018, Anglo American, October 2022), and Visible Felt Leadership and Workplace Inspection Frequency (UNK-MIN-SHE-PRO-0026, Anglo American, November 2022). Other procedures covering high-risk activities reflect a systematic process for assessing risks, |

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| | | | establishing preventive and protective controls, and integrating legal and other applicable requirements into risk management, as further outlined in Section 3.2.2.4.<br><br>Regular performance reviews and monitoring of the site's OHS management system are documented in the Integrated SHE Performance Monitoring, Evaluation and Analysis Plan for 2025 (Anglo America, no date), which indicates that mechanisms are in place to monitor OHS performance. Likewise, the Learning from Incidents Procedure (UNK-MIN-SHE-PRO-0023, Anglo American, February 2023) provides evidence that mechanisms exist for reporting and investigating accidents.<br><br>Additional evidence, including the SHE Management Systems Review materials for 2023 H1 & H2, 2024 H1 & H2, and 2025 H1, indicates ongoing evaluations of safety performance over time, as well as tracking the implementation of action items aimed at reviewing and improving safety performance. External reviews of the systems are documented in the Legal Compliance Audit Report (LSD Partners, July 2023) and the Audit Assessment Report for ISO 45001:2018, ISO 9001:2015 and ISO 14001:2015 (BSI, 2024). A sample of Development, Implementation and Internal Auditor Certificates (Business Excellence Southern Africa, August 2022) indicates the company retains personnel qualified to evaluate the site's system against relevant ISO Standards, and a sample of SHE Policy Awareness attendance records (Anglo American, May 2025) indicates the company trains its personnel on the SHE policy.<br><br>Interviews with a sample of workers, including contractors, supervisors and key OHS management staff as well as observations across operational areas (e.g., underground mining, smelter operations, equipment maintenance, waste management, and |

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| | | | worker transport) indicate that workers understand safety expectations and implement routine OHS controls (e.g., pre-shift toolbox talks, job risk identification) to actively contribute to continuous improvement, particularly in incident and injury prevention (i.e., through reporting of near miss and hazards). Interviews confirmed that the system is overseen by competent professionals, and relevant information is communicated and utilized for continuous improvement at the operating level (i.e., through toolbox talks, safety alerts, noticeboards, shift meetings, etc.) and utilized in planning and decision-making. Contractors confirmed that they are included in these processes through induction, toolbox talks, and shared reporting mechanisms.<br><br>The evidence, supported by interviews and observations, indicates that the company has implemented a health and safety management system to measure and improve the site's health and safety performance. |
| 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. | ● | The evidence reviewed includes the Hazard and Aspect Identification and Assessment of Safety, Health, Environment, and Quality (SHEQ) Risks and Opportunities Procedure (UNK-MIN-SHE-PRO-0004, Anglo American, September 2023) documenting a structured approach for hazard identification, risk analysis, evaluation, and control, and the Operational Risk Management Standard (Valterra Platinum, August 2025), which details the step-by-step four (4) phase process by which risk management is implemented at the site level, defining terms of reference and outlining the tools applied at each phase.<br><br>A Baseline Risk Assessment register covering Social and Human Rights Impact and Risk Analysis (SHIRA) / Workplace Risk |

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| | | | Assessment and Control (WRAC) (Valterra Platinum, 2025) provides an annually reviewed register of hazards and aspects associated with operational activities per department, documenting impacts, mitigation measures, controls, and responsibilities. A sample of Baseline Risk Assessment and SHIRA Attendance Registers (2024 and 2025) and Tailing Storage Facility (TSF) WRAC and Bowtie Review Attendance Register (March 2025) confirms worker participation in the annual updating of WRAC registers.<br><br>Additional evidence includes task-level and area-specific assessments and tools such as WRACs for Explosives Handling, Transportation, Storage and Security (Valterra Platinum, July 2025), Solar Farm Bush Clearance (Anglo American, May 2025), Process Safety Priority Unwanted Events (PUE) Attendance Register (Anglo American, April 2024), a sample of completed Stop, Look, Assess and Manage (SLAM) forms for different work areas (Mining: August 2025, May 2025; Smelter: October 2025). Internal audit documentation, including the Executive Summary Internal SHEQ Audit Report H1 2024 (Anglo American, July 2024), confirms that the risk assessment process is subject to review and continual improvement.<br><br>During interviews, workers, including contractors, described regular engagement with structured health and safety risk assessment processes at the task and operational levels, including pre-shift assessments, inspections, and toolbox talks. Interviewees demonstrated general awareness of site risk assessment tools and controls and confirmed that risks identified through higher-level assessments are communicated to the workforce through routine safety briefings. Interviews indicate that while baseline and issue-based risk assessments are largely led by management and technical specialists, outcomes are integrated into day-to-day |

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| | | | operations through established operational risk management processes.<br><br>The evidence, supported by interviews, indicates that the company has implemented a systematic health and safety risk assessment process across operational levels that follows recognized risk assessment methodologies, including SHIRA, WRAC, SLAM, and PUE. |
| 3.2.2.2. | The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:<br><br>a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and machinery, and waste and chemical management;<br><br>b. All personnel, contractors, business partners, suppliers and visitors;<br><br>c. Unwanted events;<br><br>d. Routine and non-routine activities, products, procedures, and services; and | ● | The evidence reviewed includes a set of documented procedures, risk matrices, baseline and task-level assessments, contractor and competence controls, and change management records used to identify and assess hazards across the mining operation relating to:<br><br>a. The design, construction, and operation of the workplace. The assessment of hazards associated with workplace design, operational processes, equipment, waste and chemical management, and physical stability are guided by the Hazard and Aspect Identification and Assessment of SHEQ Risks and Opportunities Procedure (UNK-MIN-SHE-PRO-0004, Anglo American, September 2023) and systematically assessed through the Integrated Risk Management (IRM) Risk Matrix (Valterra Platinum, July 2025) and the SHIRA WRAC (Valterra Platinum, September 2025). Task- and area-specific risks are further evaluated through Job Risk Assessments (JRAs) (Anglo American, November 2020–August 2025) for activities such as Surface Blasting at TSF Borrow Pits and LHD Maintenance, and Issue-Based WRACs (November 2019–September 2025) for activities such as the Solar Project, SLP 8 (i.e., underground mining vehicle) Change , Tramming, and Truck Park Bay operations, which indicate coverage |

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| | e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services. | | of routine and specialized mining activities and associated physical and operational hazards.<br><br>b. Site personnel and visitors. The Competence and Awareness Procedure (UNK-MIN-SHE-PRO-0007, Anglo American, September 2023) and the Procurement and Contractor Management Procedure (UNK-MIN-SHE-PRO-0014, October 2022) outline expectations for ensuring personnel, contractors, business partners, and visitors are considered in the risk assessment process, including their competence, awareness, and assigned responsibilities.<br><br>c. Unwanted events. Major unwanted events are identified through the TOP 10 Priority Unwanted Events (PUEs) / Fatal Risks (Valterra Platinum, 2025), which cover hazards such as irrespirable atmospheres underground, structural instability, tailings containment failure, and explosive detonation. These events include defined mitigation strategies and controls applied within operational planning and risk reviews (e.g., PUE processes and Issue-Based WRAC reviews).<br><br>d. Routine and non-routine activities, products, procedures, and services. This is supported by a set of JRAs (Anglo American, November 2020–August 2025) and Issue-Based WRACs (November 2019 to September 2025), which cover both routine and non-routine tasks, such as maintenance, repairs, equipment upgrades, and operational changes. Additional integration with operational oversight is supported through the Visible Felt Leadership and Workplace Inspection Frequency Procedure (UNK-MIN-SHE-PRO-0026, Anglo American, November 2022) and monitoring requirements in the SHE Performance Measurement |

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| | | | and Monitoring Procedure (UNK-MIN-SHE-PRO-0018, Anglo American, October 2022).<br><br>e. Changes in Conditions (Including changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products, systems, and services). This is addressed by the Change Management Procedure (UNK-MIN-SHE-PRO-0013, Anglo American, March 2023) and the Register of Changes (Anglo American, October 2024; June 2025), which document how operational and organizational changes are reviewed for risk implications. The 2024 Register records 24 changes across HR, Engineering, Process, SHE, Finance, Mining, and Smelter, while the 2025 Register documents 13 changes between January and May 2025. Updates to the WRAC are governed by the Hazard and Aspect Identification and Assessment of SHEQ Risks and Opportunities Procedure, which requires periodic review and updating in response to operational changes, incidents, audits, and changes in internal and external conditions. The evidence indicates that the WRAC has been revised 10 times since its initial version in 2010. Additionally, the SHE Performance Monitoring Procedure documents that the company considers the impact of changes in personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products, systems, and services on risk profiles, to inform updates to controls, responsibilities, and procedures as conditions evolve.<br><br>Interviews with workers, including contractors, supervisors, and SHE representatives, indicate that risk assessment processes are routinely applied at task and departmental levels, particularly through Job Risk Assessments, Stop-Look-Assess-Manage (SLAMs), workplace inspections, and toolbox talks. |

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| | | | The evidence, supported by interviews, indicates that the company implements a risk assessment process that systematically identifies and evaluates the significance of hazards across operational, personnel, procedural, and change-related domains, in alignment with sub-requirements (a) through (e). |
| 3.2.2.3. | The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to particular hazards. | ◐ | The evidence reviewed includes the OHS Management Systems Manual (Anglo American, November 2024) and the Operational Risk Management Standard (Valterra Platinum, August 2025), which outline the company's structured methodology for identifying and assessing operational risks. Baseline occupational hygiene risk assessments and WRACs demonstrate systematic identification and assessment of occupational hazards and exposures across tasks and job categories (see 3.2.2.2). The Code of Practice for Occupational Hygiene on Personal Exposure to Airborne Pollutants (Anglo American, December 2020) and the Mandatory Code of Practice for an Occupational Health Programme for Noise (Anglo American, September 2023) establish monitoring and medical surveillance requirements for occupational hygiene exposures such as dust, fumes, chemicals, and noise. In addition, the Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, Anglo American, September 2023) requires all employees to undergo medical examinations and screening tests aligned with occupational exposure profiles and task requirements, providing a mechanism to identify individual health limitations following medical assessment.<br><br>In relation to vulnerable worker groups, the Pregnancy in the Workplace Policy (Anglo American, March 2017) includes a table that identifies work areas, tasks, and exposures unsuitable for pregnant or breastfeeding employees, and outlines high-level risks |

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| | | | and protective measures. In addition, a sample of Functional Work Assessment Reports for two (2) workers (January 2025) shows that tasks are evaluated individually and adjusted based on declared health status (e.g., illness, injuries), consistent with the application of fitness-to-work and medical surveillance processes following the identification of individual vulnerabilities.<br><br>Interviews indicate that vulnerability-related considerations are addressed on an ad hoc basis rather than through a documented, systematic risk assessment process. Supervisors and key OHS personnel indicate that while occupational hygiene hazards (including dust, noise, fumes, heat) and chemical exposure are generally identified and managed through baseline assessments, PPE requirements, and task-level controls with individual accommodations or alternative work arrangements implemented following medical assessments, there is limited evidence that the company systematically identifies or assesses hazards specific to workers who may be especially susceptible or vulnerable. Female workers and contractors reported inconsistent practices regarding pregnancy-related accommodations. A variety of accommodations to ensure safe performance were observed during the onsite audit, including access to height, restricted-access signage for pregnant women, ramps and lifts, task-specific PPE, and other similar measures.<br><br>The evidence indicates that the company has identified certain hazards relevant to some vulnerable workers, such as pregnant women, through policy-level assessments and workplace accommodations, and conducted medically informed functional work assessments for workers who have formally declared a specific health status. |

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| | | | The evidence does not include details confirming that the company has a documented and systematic process within its hazard identification and risk assessment framework to proactively identify or assess hazards specific to workers who may be especially susceptible or vulnerable to particular hazards (e.g., pregnant workers, young workers, or workers with pre-existing health conditions). The risk assessments reviewed do not consistently indicate that task-specific limitations or control measures are identified or integrated into hazard identification and risk assessment processes for susceptible or vulnerable individuals or vulnerable worker groups performing the tasks. |
| 3.2.2.4. | The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards. | ● | The evidence reviewed includes the SHE Management Systems Manual (Anglo American, November 2024), which establishes the site's SHE risk management framework, including defined responsibilities, hazard identification and risk assessment requirements, and application of the hierarchy of controls prioritizing elimination and source controls before administrative controls and PPE.<br><br>Hazard identification, risk quantification, and control selection processes are detailed in the Hazard and Aspect Identification and Assessment of SHEQ Risks and Opportunities Procedure (UNK-MIN-SHE-PRO-0004, Anglo American, September 2023), supported by the SHE Legal and Other Requirements and Evaluation Procedure (UNK-MIN-SHE-PRO-0005, Anglo American, October 2022). These procedures require the identification of hazards, the ranking of risk criticality, the evaluation of existing controls, and the determination of additional mitigation measures. |

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| | | | Implementation and systematic review are evidenced by the Baseline Risk Assessments (June 2023, March 2024, March 2025), signed by SHEQ management, which indicate annual reviews of hazards, assessments of control effectiveness, and the identification of further controls. A review of sampled risk registers indicates that source, engineering, and administrative controls are applied prior to reliance on PPE, consistent with the hierarchy of controls.<br><br>Monitoring and verification mechanisms are documented in the SHE Performance Measurement and Monitoring Procedure (UNK-MIN-SHE-PRO-0018, October 2022). The Integrated SHE Monitoring, Evaluation and Analysis Plan for 2025 (initially developed 2020, updated annually) defines measurable parameters, monitoring methods, legal or other standards, frequencies, and responsible persons for following up on identified hazards, and establishes processes for performance analysis and evaluation.<br><br>A sample of operational procedures for high-risk activities, including charging and blasting, fall-of-ground management, underground transport, hot work, and diesel refueling (e.g., UNK-MIN-MIN-PRO-0013, October 2023; UNK-MIN-MIN-PRO-0057, May 2023), outline specific controls designed to eliminate hazards where practicable and, where elimination is not reasonably practicable, to minimize risk through engineering controls, administrative controls, defined safe work systems, competency requirements, supervision, pre-task risk assessments, and PPE.<br><br>Interviews with workers, supervisors, and OHS managers indicate that the company has implemented structured processes for hazard identification and risk assessment at multiple levels (task-based, shift-based, and annual baseline reviews). Interviewees described the application of the hierarchy of controls, with |

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| | | | examples of engineering controls (e.g., ground support systems, vehicle safety features), administrative controls (e.g., permits, supervision, training), and PPE requirements for residual risks.<br><br>Workers showed awareness of key safety controls for high-risk activities, such as fall-of-ground hazards, blasting, hot work, underground transport, and diesel refueling. Observations in the workplace confirmed the presence of safety signage, availability and use of PPE, and access to relevant procedures and safety data sheets in operational areas. Management personnel confirmed that risk management documentation is reviewed and updated following incidents, audits, and monitoring results.<br><br>The evidence, supported by interviews, indicates that the company has developed and implemented processes to systematically identify hazards, eliminate them where possible, apply additional controls to reduce remaining risks, periodically review the effectiveness of these controls, and update them as needed. |
| 3.2.2.5. | In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:<br><br>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;<br><br>b. Ensure that the mine is commissioned, operated, maintained | ● | The evidence reviewed includes a set of SHE management system documents, high-risk activity operational procedures, emergency response and drill records, engineering and isolation standards, monitoring logs, and technical reports, covering:<br><br>a. Equipment and Communication Systems: The company has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment; as supported by the Control and Instruments Inspection Log (Valterra Platinum, August 2025), the Radios Control Procedure (UNK-MIN-ENG-PRO-0227, Anglo |

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| | 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;<br>c. Maintain the stability of the ground in areas to which persons have access in the context of their work;<br>d. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface;<br>e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted;<br>f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards;<br>g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and<br>h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location. | | American, December 2022) and the Isolation and Lockout Standard (Valterra Platinum, December 2024).<br>b. Commissioning, Operation, Maintenance, Decommissioning; as supported by procedures including the Permit to Work (Valterra Platinum, September 2022), Hot Work (Anglo American, July 2022), Confined Space Entry (Anglo American, March 2021), and Isolation and Lockout (Valterra Platinum, December 2024) and the Closure Liability Estimate 2024 (SRK Consulting, February 2024), which describes the mine's planned closure and rehabilitation actions and indicates integration of closure considerations into occupational risk management. These procedures aim to ensure that mining activities are performed without endangering workers' and other people's health.<br>c. Ground Stability; as supported by the Major Fall of Ground Drill Report (Anglo American, March 2025) and the Fall of Ground Triggered Action Response Plan (TARP) Classification Procedure (Anglo American, May 2023), which aim to ensure that underground-related hazards are identified and their associated risks are effectively managed to address fall-of-ground events, thereby protecting people and equipment.<br>e. Ventilation; as supported by the Underground Mine Ventilation Survey Report (Anglo American, May 2024), which provides evidence of actions taken on airflow management and circulation to ensure safe underground conditions, including the measurement of air-change rates achieved within an hour, and the diagramming of underground circulation paths.<br>f. Protection of workers in zones susceptible to particular hazards; as supported by a set of procedures intended to ensure a safe system |

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| | | | of work, including Confined space entry (Anglo American, March 2021); Hot Work (Anglo American, July 2022); Isolation and Lockout (Valterra Platinum, December 2024); and Permit to Work (Valterra Platinum, September 2022).<br><br>g. Safe re-entry of underground mine workings after blasting by measuring the absence of hazardous gases as described in the Immediate Re-entry after Primary Blasting Procedure (Anglo American, June 2021) and measuring of dust and implementing mitigation actions as indicated by a Personal Dust Monitoring Report for the underground mine (Unki Mine, Q1 2025).<br><br>h. Workers' evacuation to a safe location, as supported by the Emergency Response Plan (Valterra Platinum, August 2025), the Underground Refuge Chamber Procedure (Anglo American, August 2023), and the Major Fall of Ground Drill Report (Anglo American, March 2025), which prescribe that operations be stopped and workers evacuated when they're exposed to high-risk conditions.<br><br>Observations and interviews with a sample of workers and contractors indicate that elements of a risk management system are in place to provide the conditions for a safe and healthy work environment as outlined in (a) through (d) and (f) through (h). Interviews with workers and contractors confirm they have the equipment, training, and support to do their job safely, including stopping work when there is a potential risk of harm (h). On-site audit observations and interviews with workers, supervisors, and key OHS staff provide evidence that:<br><br>c. Ground Stability: Ground conditions are monitored on a regular basis at the TSF, etc. |

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| | | | d. Two Exits from Underground Workplaces: Two (2) independent means of egress are available for underground.<br><br>e. Ventilation: Ventilation is perceived by some interviewees as insufficient in certain underground areas.<br><br>g. Gas and dust monitoring: Gas monitors in place, calibrated and operating as intended, and worker competency in operating such equipment, including knowing the importance of such use (e.g., prevent gas accumulation and explosion);<br><br>h. Operations stopped under high-risk conditions: Workers expressed confidence in their ability to stop work under high-risk conditions without fear.<br><br>Interviews also confirmed worker and contractor induction, training, and skills, PPE provision; availability of work permits, pre-work inspections, including pre-use inspections, certifications, and repairs and maintenance for equipment. Interviews with key OHS personnel (site safety, emergency response, and medical providers) and workers indicate a high awareness of safety programming. A sample of workers similarly indicate a high level of confidence in the site's safety procedures; workers could relay safety training elements, processes and schedules (i.e., daily, job-specific) for example, workers knew where fire extinguishers were located, where to muster in the event of an emergency (assembly points, refugee camps, etc), and where to go for first aid (for themselves or others).<br><br>The evidence, including interviews and on-site observations, indicates that the company has developed procedures and implemented the measures required under items (a) through (h). |

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| 3.2.3.1. | Workers shall be informed of their rights to:<br>a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority;<br>b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority;<br>c. Know and be informed of workplace hazards that may affect their safety or health;<br>d. Obtain information relevant to their safety or health, held by the employer or the competent authority;<br>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<br>f. Collectively select safety and health representatives. | ● | The evidence reviewed includes a set of procedures and records that document the mechanisms through which the company informs its workers of their rights to:<br>a. Reporting accidents, dangerous occurrences and hazards, as supported by the attendance records for Reporting a Near Miss training (Valterra Platinum, May 2025) showing 35 attendees for Tsebo section, and the Non-Conformity and Corrective Actions Procedure (October 2022), which provide documented channels through which workers are informed of their right to report incidents, near misses, and hazards including mechanisms for raising nonconformances and work stoppages.<br>b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority. This is supported by the SHE Communication, Consultation and Participation Procedure (January 2025), which describes processes for worker engagement with SHE structures and outlines avenues for raising safety concerns. The procedure outlines mechanisms through which workers may request inspections or investigations when safety or health concerns arise.<br>c. Know and be informed of workplace hazards that may affect their safety or health. Workers are informed of workplace hazards on an ongoing basis at multiple levels through orientation, training events, and briefings occurring annually, weekly, or daily, such as pre-shift, pre-job (e.g., Job Risk Assessments and Issue-Based Risk Assessments), and as needed. Supporting evidence includes a set of Stop-Look-Analyse-Manage (SLAM) Training videos (Valterra Platinum, May 2023), and other documents such as Rules for Life (Valterra Platinum, May 2025), and Emergency Preparedness and |

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| | | | Response Procedure (Anglo American, October 2022). In addition, a sample of attendance registers to Generic Inductions (Valterra Platinum, 2025), which address health and safety hazards, indicates that new hires are informed prior to starting their jobs.<br><br>d. Obtain information relevant to their safety or health held by the employer or the competent authority, as supported by the Communication and Consultation Procedure (Anglo American, January 2025) and induction training materials (Generic Induction, Valterra Platinum, no date).<br><br>e. Remove themselves from any location posing a serious danger to their safety or health, as supported by Rules for Life (Valterra Platinum, May 2025), which states that workers are permitted to stop or refuse to work when critical safety controls are not in place, and the Emergency Preparedness and Response Procedure (October 2022), which communicates expectations and worker rights related to stopping work and removing themselves from hazardous conditions when serious danger is reasonably justified.<br><br>f. Collectively select safety and health representatives. Supporting evidence includes records of Underground SHE Representative appointments (Valterra Platinum, October 2025) and their monthly inspection reports (Valterra Platinum, July-September 2025).<br><br>Interviews with employees and contractors indicate a generally strong awareness of worker rights related to occupational safety and health. Workers reported confidence in reporting hazards, near misses, and accidents; stopping work and removing themselves from unsafe situations without fear; participating in the nomination and selection of SHE representatives; and receiving regular information on workplace hazards (i.e., inductions, toolbox talks, |

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| | | | SLAMs, safety alerts, and supervisor engagement). Workers were also able to describe practical mechanisms for exercising these rights, including escalation to supervisors, activation of emergency stops, and engagement with SHE representatives.<br><br>The evidence, supported by interviews, indicates that workers are provided information about their rights specified in sub-requirements a through f, throughout the course of their employment. |
| 3.2.3.2. | In all cases a worker attempting to exercise any of the rights referred to in 3.2.2.1 in good faith shall be protected from reprisals of any sort. | ◐ | The evidence reviewed includes the Non-Retaliation Procedure (UNK-MIN-HRS-PRO-0216, Anglo American, May 2022), the Rules for Life document (Valterra Platinum, May 2025) and the SHE Communication, Consultation and Participation Procedure (UNK-MIN-SHE-PRO-0008, Anglo American, January 2025), which support that the company actively engages its employees to recognize and report workplace safety concerns and incidents, including inappropriate conduct, and has established a number of systems to do so.<br><br>The Non-Retaliation Procedure explicitly sets out protections for workers who report incidents, hazards, or concerns in good faith, ensuring that employees freely raise their concerns without fear of victimisation. The SHE Communication, Consultation and Participation Procedure establishes mechanisms for worker participation in SHE matters, addresses barriers to worker engagement, and provides channels for raising concerns without adverse consequences. The document Rules for Life (Valterra Platinum, May 2025) further reinforces the principle that reporting hazards or stopping unsafe work is supported, and that workers are |

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| | | | empowered to protect their safety, including refusing to work where critical controls are not in place or conditions are unsafe<br><br>Interviews with workers indicate a general understanding of the policies and procedures for reporting safety concerns, incidents, hazards, and safety-related grievances, including the option to report anonymously. At the same time, several workers noted factors that may discourage reporting, such as perceptions that root-cause analyses may focus on individual error, that the reporting process can be time-consuming, or that reporting could lead to negative repercussions. Some workers and contractors also described hesitancy to raise concerns due to apprehension about being labelled a “troublemaker.” Several workers provided examples in which safety concerns raised in good faith led to corrective actions. Most workers reported discussing safety concerns directly with their supervisor rather than using a formal grievance mechanism, as they are uncertain about anonymous reporting mechanisms and fear potential negative employment consequences.<br><br>The evidence indicates that the company has developed procedures to protect workers from reprisal when attempting to exercise their rights related to health and safety protection.<br><br>The evidence, including interviews with workers, does not confirm that all workers perceive themselves to be protected from reprisals of any sort when attempting to exercise any of the rights referred to in 3.2.2.1 in good faith, and it does not provide information on whether any instances of perceived or actual reprisal have been reported and addressed, if applicable, in a manner that reduces the |

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| | | | potential for similar incidents to occur in the future, including for contractors. |
| 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. | ● | The evidence reviewed includes a SHE Communication, Consultation and Participation Procedure (UNK-MIN-SHE-PRO-0008, Anglo American, January 2025), and a sample of Toolbox Talk Attendance Registers (Anglo American, February to May 2025), Main SHEQ Meeting Minutes (Valterra Platinum, March 2025) with attendance by managers and supervisors, a photo of Safety Management Information (SMI) on Notice Boards (Valterra Platinum, no date), SHE Representative Appointments (Valterra Platinum, October 2025), and a SHE Perception Survey 2024 (Anglo American, 2024).<br><br>The SHE Communication, Consultation and Participation Procedure outlines formal mechanisms for worker engagement, including communication channels, consultation processes, and participation structures. Toolbox Talk attendance records indicate that routine safety briefings are conducted to inform workers and provide opportunities for interaction on specific SHE topics (e.g., Hypertension Awareness, Incident Reporting, Incident Investigation, SHE Policy). The Main SHEQ Meeting Minutes (Anglo American, March 2025) further support structured platforms where safety issues are discussed, actions reviewed, and feedback incorporated. The photo of SMI Notice Boards indicates the company displays various Occupational Health and Safety (OHS) related information, including Life Saving Golden Rules, Evidence-Based Decision-Making guidance, Hierarchy of Controls, Emergency Evacuation Plan, “Keep Us Alive” critical controls, and other safety alerts and communication materials relevant to worker health and safety. |

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| | | | Additionally, the SHE Perception Survey reflects a mechanism for gathering workforce input on safety culture and performance, while SHE Representative Appointments (Valterra Platinum, October 2025) confirm the presence of elected worker representatives acting as intermediaries between management and workers.<br><br>Interviews with workers and contractors indicate that task-specific safety risks and mitigation measures are routinely communicated through toolbox talks, pre-shift meetings, and supervisor engagement. Workers described using anonymous complaints books located across the site, SHE representatives, worker committees, and direct engagement with supervisors to raise safety concerns, and reported receiving feedback on issues raised, particularly at the task or departmental level. Interviews with key OHS staff confirmed that regular meetings are held between management and SHE representatives to discuss safety issues, supported by ongoing training and awareness campaigns.<br><br>The evidence, supported by interviews, indicates that the company has implemented systems to effectively communicate with and enable workers and their representatives to provide input on OHS matters. |
| 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 | ◐ | The evidence reviewed includes a SHE Communication, Consultation and Participation Procedure (UNK-MIN-SHE-PRO-0008, Anglo American, January 2025), which outlines mechanisms for worker engagement on health and safety matters; a Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, Anglo American, September 2023); an Integrated SHE Performance Monitoring, Evaluation and Analysis Plan – 2025 (Anglo American, no date); and a Hazard and Aspect Identification and Assessment of SHEQ Risks |

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| | occupational health and safety including:<br><br>a. Health and safety hazard identification and assessment;<br><br>b. Design and implementation of workplace monitoring and worker health surveillance programs;<br><br>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<br><br>d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. | | and Opportunities Procedure (UNK-MIN-SHE-PRO-0004, Anglo American, September 2023). Additional documentation includes a SHE Performance Measurement and Monitoring Procedure (UNK-MIN-SHE-PRO-0018, Anglo American, October 2022), SHE Representative Appointment Forms (October 2023 and July 2023), SHEQ Representatives Nomination Forms (March 2025 and November 2024 for Engineering Shifts A, B and C), and samples of SHE Representative Inspection Reports from Mining-8 South (September 2024), Mining-15 South Workshop (March 2025), and the Process-Smelter (April 2024). Attendance registers for various health and wellness sessions (Cervical Cancer Awareness (September 2025); Heat Stress (September 2025); HIV and STI Awareness - June 2025; Health Topic Q3-June 2025; and Mental Health Q1-2025) were also provided. The SHE Roles, Responsibility, Authority and Resources Procedure (UNK-MIN-SHE-PRO-0002, Anglo American, June 2023) further outlines the designation of roles for health and safety participation.<br><br>The evidence indicates that the company has developed a processes for involving workers' representatives and company management and promote worker participation in matters relating to occupational health (OHS) and safety including:<br><br>a. Health and safety hazard identification and assessment, as supported by the Hazard and Aspect Identification and Assessment of SHEQ Risks and Opportunities Procedure (UNK-MIN-SHE-PRO-0002, June 2023), SHE Representative appointments, and inspection records, which showcase active participation of workers and worker representatives in hazard recognition activities.<br><br>b. Design and implementation of workplace monitoring and worker health surveillance programs, as supported by a sample of 30 |

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| | | | monthly safety inspections for the period April 2024 to March 2025, which credits participation and recommendations made by the SHE representatives. Additional evidence includes standards such as the Fitness to Work Procedure, SHE Performance Measurement and Monitoring Procedure, and the Integrated SHE Performance Monitoring, Evaluation and Analysis Plan, which provide a framework for workplace monitoring and worker health surveillance.<br><br>Interviews with workers and SHE representatives indicate that the company has established multiple avenues for worker consultation and participation in occupational health and safety (OHS) matters. These include primarily toolbox talks, pre-shift meetings, SHE inspections, and periodic SHE meetings with management, in addition to OHS information posted in notice boards. Key OHS staff indicate active involvement of SHE Representatives in hazard identification and task-level risk assessment processes, including participation in inspections, incident investigations, and the identification of unsafe conditions. Some workers indicated significant delays in providing specific personal protective equipment (PPE) or engineering modifications to address an OHS risk identified by workers and recognized by management. Reportedly, the time delays are attributed to budget constraints or bureaucratic delays in procurement.<br><br>The evidence, supported by interviews, indicates that the company has in place formal processes involving workers and worker representatives and company management to deal with OHS matters, and seeks to promote workers' participation in these matters, including: |

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| | | | a. Health and safety hazard identification and assessment, and<br>b. Design and implementation of workplace monitoring and worker health surveillance programs.<br>The evidence does not include sufficient documentation to confirm effective worker consultation and formal participation in the development of strategies to prevent or mitigate occupational health and safety risks identified through risk assessments or health surveillance programs (c), or the development of worker health and assistance programs, including mental health programs (d). |
| 3.2.3.5. | The operating company shall provide workers' health and safety representatives with the opportunity to:<br>a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace;<br>b. Monitor and investigate safety and health matters;<br>c. Have recourse to advisers and independent experts; and<br>d. Receive timely notice of accidents and dangerous occurrences. | | The evidence reviewed includes SHE Representative Appointment Forms for Mining North (Valterra Platinum, October 2025), which show three (3) appointments, and for Engineering (Valterra Platinum, January 2025), which show two (2) appointments. The evidence also includes a sample of two (2) SHE Representative Incident Participation Records (Anglo American, no date), SHE Representative Inspection records for inspections conducted between July 2025 and October 2025, and a sample of a Work Injury Incident Notification (Valterra Platinum, January 2025). The evidence indicates that the company provides SHE representatives with the opportunity to:<br>a. Participate in inspections and investigations, as evidenced by formal appointment records issued to SHE Representatives (Appointment Forms for Mining North, Valterra Platinum, October 2025), formally designated following the company's procedures to participate, along with other involved staff, in incident investigations, and OHS inspections. |

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| | | | b. Monitor and investigate safety and health matters, as supported by a sample of 10 reports of SHE Representative inspections conducted between July 2025 and October 2025, indicating representatives' involvement in monitoring workplace conditions and investigating health and safety matters, as the inspection reports document their observations, recommendations, and follow-up actions.<br><br>d. Receive timely notice of accidents and dangerous occurrences, as supported by the Work Injury Incident Notification, which documents a slip and fall incident and indicates it was disclosed to all employees, including SHE Representatives, on the same day of the incident.<br><br>Interviews with supervisors and key OHS management staff indicate that SHE representatives routinely participate in incident investigations and conduct regular workplace inspections, with management support. SHE representatives were described as having opportunities to raise safety issues, select toolbox talk topics, and follow up on corrective actions at the section level. Interviewees further indicated that SHE Representatives have access to external assistance through regulatory inspections by competent authorities, rather than through a formal mechanism for recourse to advisers and independent experts. Interviews with workers and SHE representatives, indicate that the company has established mechanisms for worker participation in OHS matters, including SHE inspections.<br><br>The evidence indicates that the company provides workers' SHE representatives with opportunities to participate in inspections and |

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| | | | investigations at the workplace (a), monitor and investigate safety and health matters (b), and receive timely notice of accidents (d).<br><br>The evidence does not include information to confirm that SHE Representatives have recourse to advisers and independent experts (c). |
| 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. | ● | The evidence reviewed includes the General Induction Training (Valterra Platinum, no date), a set of General Induction Attendance Registers (Anglo American and Valterra Platinum, February to September 2025), and the Competence and Awareness Procedure (UNK-MIN-SHE-PRO-0007, Anglo American, September 2023).<br><br>The General Induction Training provides visitors and third parties with comprehensive OHS briefings prior to accessing mine facilities. The induction, which is two (2) hours in duration, covers operational topics (Values, Occupational Health and Safety, Environmental Management, SHE Policy, SHE Way Values, and the Accountability Framework), as well as Protection Services and Human Resources policies and practices. Each section includes a knowledge check to verify comprehension, and the course concludes with a quiz that must be passed with a score of 100% to complete successfully. The General Induction Attendance Registers indicate that participants are formally recorded and tracked. The Competence and Awareness Procedure outlines the processes for ensuring that visitors and other third parties are informed of relevant OHS requirements prior to accessing mine facilities.<br><br>Interviews with supervisors and key OHS management staff, together with onsite observations, indicate that visitors and third parties are required to complete a site induction and are provided |

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| | | | with personal protective equipment (PPE) appropriate to the areas they access. Observations confirmed the presence of safety signage in high-risk areas (e.g., workshops, confined spaces, high-noise areas, and high-temperature zones). Onsite observations and auditor experience further indicate that the company has established a structured program to safeguard the health and safety of visitors. This includes on-site medical screening and arrival monitoring, induction training, work-area-specific safety briefings, and the provision of appropriate PPE for the areas accessed.<br><br>The evidence, supported by interviews and observations, indicates that visitors and other third parties accessing the mining premises receive an OHS briefing and are provided with the protective equipment required for the specific areas of the mine site they access. |
| 3.2.4.1. | Critical. The operating company shall implement measures to protect the safety and health of workers including:<br><br>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;<br><br>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 | ◔ | The evidence reviewed includes a Hazard and Aspect Identification and Assessment of SHEQ (Safety, Health, Environment, and Quality) Risks and Opportunities Procedure (Anglo American, September 2023) and SHE (Safety, Health, and Environment) Communication, Consultation and Participation Procedure (Anglo American, January 2025), which provide the company's framework for identifying, addressing, and communicating occupational health and safety (OHS) matters. Supporting evidence, such as OHS procedures and records, indicates that the company has implemented measures to protect the health and safety of its workers, by:<br><br>a. Informing workers of the hazards associated with their work and the health risks: |

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| | accident or injury to health cannot be ensured by other means;<br><br>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;<br><br>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;<br><br>e. Providing adequate supervision and control on each shift; and<br><br>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground. | | The SHE General Induction Attendance Registers (Valterra Platinum, February to September 2025) indicate that 51 employees attended general induction training during this period, while a sample of a site-specific induction register (Valterra Platinum, September 2025) records 12 participants. These registers demonstrate that workers receive training that clearly and comprehensibly communicates workplace hazards, health exposures, and required preventive measures. The Competency and Awareness Procedure (Valterra Platinum, September 2023) outlines five (5) levels of induction: general, visitor, refresher, return-from-leave, and site-specific inductions. The procedure also provides for annual training and competence needs programmes on SHEQ topics facilitated by Heads of Departments (HODs). A sample of Quarterly Health Topics (Anglo American, Valterra Platinum, 2024 and 2025) indicates that the company distributes information on certain industrial health exposures and preventive actions (e.g., noise, respiratory irritants).<br><br>b. Providing suitable protective equipment and clothing:<br><br>The company provides personal protective equipment (PPE) to workers at no cost, in accordance with documented procedures (Identification, Selection, Use, Maintenance and Disposal of PPE Procedure, Valterra Platinum, October 2025). The PPE Matrices for the Commercial (Anglo American, June 2024) and Engineering Departments (Valterra Platinum, August 2025) outline necessary PPE for specific job roles (e.g., Electrician, Dump Truck Driver). A sample of fifteen (15) completed Personal Protective Clothing Issuing Forms (Anglo American, 2020–2025) provides evidence of the regular issuance and replacement of PPE for employees. |

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| | | | c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and transportation:<br>The Medical Emergency Preparedness and Response Procedure (Anglo American, September 2023) outlines procedures for managing medical emergencies, including first aid and treatment of injuries, underground and surface emergency response, transportation of injured persons, and follow-up care at clinic and hospital levels.<br>d. Providing, at no cost to workers, training/education and retraining programs and understandable instructions on safety and health matters and assigned work:<br>The Competency and Awareness Procedure (Valterra Platinum, September 2023) indicates that training and competence needs shall be identified on an ongoing basis, informed by risk assessments, performance appraisals, audits, and inspections. It also provides for contractor competence assessments and post-training evaluations. Additional evidence consists of a sample of five (5) attendance records for training sessions addressing work-specific actors, including biological hazards, heat stress, confined space entry, fatigue management, and mental health awareness, totaling 93 participants (Valterra Platinum, August 2025 to January 2026).<br>e. Providing adequate supervision and control on each shift:<br>The Smelter Production Shift Structure (Anglo American, no date) identifies designated supervisory roles per shift, including production foremen and shift managers, demonstrating that adequate supervision is provided for operational shifts. |

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| | | | f. Establishing a system to track at any time the number of all persons who are underground:<br><br>The Clocking Procedure (Valterra Platinum, August 2025) specifies requirements for clocking in and clocking out, providing a system to track the number of personnel working underground.<br><br>Interviews with OHS staff and workers, including contractors, as well as on-site observations provide the following information:<br><br>a. Workers are informed about safety hazards (i.e., physical, chemical, biological, ergonomic) at through various mechanisms (during induction, upon hire, daily through toolbox talks, per task through SLAMs [Stop, Look, Assess, Manage] and safety observations, and through training on specific OHS-related labour risks, among others). Workers and contractors interviewed generally perceive the OHS programme to be robust. During interviews with workers, a small number indicated uncertainty about whether all work-area-specific health exposures have been fully identified and communicated. Relevant company staff reported that each employee is made aware of the potential health impacts associated with their roles during the annual medical surveillance, conducted in accordance with the Fitness to Work Procedure (Anglo American, September 2023). Additionally, staff explained that employees sign off to confirm completion of the medical examination and receipt of the corresponding feedback.<br><br>b. PPE is provided at no cost. Some workers reported that the standard six-month PPE replacement interval does not adequately account for the frequency of wear and tear associated with certain work tasks and operating environments, or mid-shift changes in work clothes for areas with high mud splatter (e.g., overalls, |

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| | | | respirator cartridges, and gloves). Some workers indicated that more suitable PPE could further reduce exposure to risks and improve ergonomics. Relevant company staff report that PPE lifespans are guided by the minimum performance expectations for each item, as well as established wear-and-tear norms. The PPE cards assigned individually to each employee allow for tracking PPE lifespan and recording when replacement is required. In cases of premature failure, the items are logged and the employee is issued a replacement garment, as evidenced by internal PPE premature-failure records containing data from 2024 to 2025 (no author, no date). Some workers, including contractors, reported that they do not consistently receive timely replacements for PPE that fails prematurely or receive previously used PPE.<br><br>c. The onsite clinic delivers prompt and good-quality care, and several emergency response drills have been conducted in this regard.<br><br>d. Workers and contractors receive task-specific training.<br><br>e. Adequate supervision is provided in work areas, including high-risk activities.<br><br>f. The company uses cap lamp systems and clocking books to track the presence and probable locations of personnel working underground.<br><br>The evidence, supported by interviews, indicates that the company has developed management frameworks and procedures and largely implemented measures to protect the safety and health of workers in substantial alignment with sub-requirements (a) through (f). |

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| | | | The evidence, supported by interviews and observations indicates that, while these systems are usually understood and applied in practice, the site's procedures are inconsistently implemented in a few cases resulting in:<br>a. Some workers are not informed, in a comprehensible manner, of the health risks relevant to their specific work as reflected by varying levels of awareness reported during interviews; and<br>b. Some PPE is not suitable and consistently maintained in alignment with the site's procedures, based on workers' concerns regarding the adequacy of certain PPE items to reduce exposure to risks and improve ergonomics, or consistently replaced in a timely manner when it becomes worn, damaged, or no longer provides adequate protection. |
| 3.2.4.2. | If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers. | ● | The evidence reviewed includes the Pregnancy in the Workplace Policy (Anglo American, March 2017), Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, Anglo American, September 2023), Sick Leave Management Procedure (UNK-MIN-HRS-PRO-0211, Anglo American, February 2022), the Integrated Employee Health and Wellness Policy (Valterra Platinum, July 2025), the Integrated Employee Health and Wellness Implementation Policy Manual (Anglo American, March 2023), and relevant national legislation, including the Labour Relations (HIV and AIDS) Regulations (Government of Zimbabwe, 1998) and the Criminal Laws Amendment (Protection of Children and Young Persons) (Government of Zimbabwe, 2024). Additional evidence includes HIV and AIDS Awareness Toolbox Talk Attendance Registers (Valterra Platinum, June 2025), the Employee Health and Wellness Newsletter (Anglo American, April 2024), a Mental Health Awareness |

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| | | | in the Workplace flyer (Anglo American, no date), the 2025 Health and Wellness Activities Launch Notification (Anglo American, 2025), and a sample of Functional Work Assessment Reports for two (2) workers (January 2025).<br><br>Several procedures (e.g., Pregnancy in the Workplace, Fitness to Work, Sick Leave Management), as well as National Legislation (Labour Relations (HIV and AIDS) Regulations (1998), Criminal Laws Amendment (Protection of Children and Young Persons) (Government of Zimbabwe, 2024)) provide guidance for management on identifying workers with specific needs and implementing appropriate accommodations or restrictions. These documents indicate that no personnel are assigned tasks beyond their assessed capabilities without proper authorization, and that health-based restrictions are applied in practice to ensure worker safety.<br><br>The Pregnancy in the Workplace Policy (Anglo American, March 2017) addresses workplace risk assessments and alternative work placement for pregnant employees, based on an evaluation of physical, chemical, or biological hazards at the individual level. Functional Work Assessments (Anglo American, January 2025) for two (2) workers show that tasks are evaluated individually and adjusted based on health status (e.g., illness, injuries).<br><br>Health promotion programs and targeted training, such as Toolbox Talks on HIV and AIDS Awareness, Employee Health and Wellness newsletters, and Mental Health Awareness initiatives, are provided to support vulnerable groups.<br><br>Interviews with workers and contractors confirm awareness of additional protections for pregnant women and workers with |

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| | | | specific health limitations, including placement in and training on alternative jobs that reduce risk exposure. Female workers stated that pregnant women are restricted from hazardous areas, and this was supported by restrictive signage observed on site. Workers also confirmed the availability of health promotion programs, including HIV and TB awareness, mental health initiatives, and wellness campaigns. They reported that work assignments are adjusted in practice based on medical fitness assessments and declared health conditions.<br><br>The evidence, supported by interviews, indicates that the company identifies workers with characteristics that might create unique occupational health and safety risks, implements additional protective measures in such cases, and provides training and health-promotion programs to support the health and safety of those workers. |
| 3.2.4.3. | The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers. | ◕ | The evidence reviewed includes a Grievance Register (Anglo American, January 2023 to April 2025), which indicates that since 2023 six (6) grievances were filed by workers and includes for each grievance a reference number, date, responsible department, and closure date. However, it does not include the nature or subject of the grievances.<br><br>Onsite observations and interviews with workers, contractors, and management indicate that the operating company provides potable drinking water across the site and maintains clean, safe, and functional accommodation facilities within a designated camp area. Most interviews confirm that the accommodation meets basic worker needs and includes kitchen areas and recreational amenities such as a gym and communal spaces. A few workers |

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| | | | reported delays in the repair of accommodation facilities. Site observations also verified that gender-segregated change rooms with toilets and showers are available for employees and contractors, and that they were clean, functional, and hygienic at the time of the audit. Workers noted that these facilities are generally adequate; however, a few reported that some satellite work areas lack nearby toilet facilities, and due to the nature of their work, they are not able to leave their work post to access distant facilities when needed.<br><br>The evidence, particularly interviews and observations, indicates that the company provides clean, gender-segregated toilet, washing, and locker facilities, potable drinking water, and appropriate accommodation that substantially meet workers' basic needs.<br><br>The evidence does not fully confirm that all work areas, particularly satellite locations, consistently meet workers' basic needs, based on a limited number of worker reports regarding access to nearby facilities. In addition, while a grievance mechanism is in place, the grievance register does not specify the subject matter of grievances and therefore does not allow verification of whether concerns related to facilities or accommodation have been formally raised and addressed. |
| 3.2.4.4. | The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows: | ◕ | The evidence reviewed includes the National Social Security Authority (NSSA) Accident Prevention and Worker's Compensation Scheme SI 68 of 1990, the NSSA Act Chapter 17:04 (Government of Zimbabwe, December 2016), a NSSA Medical Report for a worker (WCIF13, May 2025), and a sample of NSSA claim forms. This documentation indicates that the operating company ensures |

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| | a. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement:<br><br>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;<br><br>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<br><br>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 | | workers are covered under Zimbabwe's statutory workers' compensation scheme. The evidence indicates that the operating company complies with Zimbabwe's statutory framework for workers' compensation, which mandates employer participation in the NSSA Accident Prevention and Worker's Compensation Scheme. The NSSA Act requires all employers to subscribe to the scheme, and the company has evidenced compliance through the submission of claim forms (WCIF14) as initial notifications of workplace injuries to the competent authority, as well as a sample medical reports (WCIF13).<br><br>The Zimbabwean compensation scheme provides medical aid and related expenses, as well as periodical payments for loss of earnings during temporary disablement, and pensions for permanent disablement. This means that workers are compensated for wages and medical expenses during the recovery and rehabilitation period through the national scheme, as required under sub-requirements (a.i) and (a.ii). In addition, the national scheme compensates occupational diseases arising out of and in the course of employment; claims processes and benefits remain available even when a disease manifests later, provided statutory criteria and medical assessments are met, in line with sub-requirement (a.iii). The scheme also provides workers with access to rehabilitation services, consistent with sub-requirement (b), as well as coverage for funeral expenses and monthly pensions for dependents, with no time limit stipulated.<br><br>Interviews with workers, supervisors, and OHS personnel corroborate that work-related injuries are managed through NSSA and that workers receive compensation via the national scheme. Regarding sub-requirement (c), the OHS managers provided |

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| | to the worker's employment at the mining project.<br>b. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and<br>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. | | explanations of compensation rendered to the family of a deceased worker and indicated that this included the payment of the funeral.<br>The evidence indicates that the company subscribes to the NSSA scheme, which provides workers with compensation for occupational accidents and illnesses in conformity with sub-requirements (a) and (b), and in partial alignment with sub-requirement (c).<br>The evidence does not include details confirming that the pension paid to spouses and dependent children of workers who have died as a result of a work-related injury or disease is paid equal to or greater than three (3) months' salary of the deceased worker (c). |
| 3.2.5.1. | The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health | ● | The evidence reviewed includes the Visible Felt Leadership and Workplace Inspection Frequency Procedure (UNK-MIN-SHE-PRO-0026, Anglo American, November 2022), a sample of SHE Representative Inspection Registers for 2024 and 2025, a sample of two (2) SHE Representative Incident Participation Records (Anglo American, no date), two (2) monthly Main SHE meeting minutes, and a SHE Management Review Meeting for H1 of 2025 (Valterra Platinum, July 2025). OHS hazard-specific technical reports provided include Analytical Laboratory Daytime Illumination Survey Report |

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| | and safety controls and protective measures. | | (Anglo American, November 2024), Concentrator Illumination Report (Anglo American, H1 2025), the Smelter Noise Survey Q1 2025 (Anglo American, April 2025), and Surface Unki North Tandamanzi Drill Rigs Noise Level Reports (Anglo American, May 2024; Valterra Platinum, June 2025), all conducted by an Occupational Hygienist. A sample of monthly Inspection Reports (September 2024–April 2025) conducted by SHE Representatives for both surface and underground work areas was provided. The reports show that they are reviewed and signed off by several supervisors (e.g., safety officer, supervisor, head of department) and include corrective action implementation trackers, which are also signed off by the safety officer once actions are closed.<br><br>The 2024 to 2025 SHE Representative Inspection Registers document monthly inspections across mining, engineering, surface, and plant areas, capturing inspection dates, responsible SHE Representatives, and identified issues. OHS Hazard-specific technical report supports systematic assessment of physical hazards conducted by company personnel. The SHE Representative Incident Participation records show that worker representatives are involved in incident investigations and have the opportunity to contribute to the assessment of operational controls and the root causes of hazardous conditions. The Visible Felt Leadership and Workplace Inspection Frequency Procedure provides a structured framework for inspections by outlining responsibilities and required frequencies. The Main SHE Meeting Minutes (Valterra Platinum, July and August 2025), as well as a SHE Management Review Meeting for H1 of 2025 (Valterra Platinum, July 2025) indicates joint collaboration between the company management and SHE Representatives on SHE matters, including the discussion of SHE |

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| | | | Representative inspection findings where escalation is required. The minutes also reflect the review of SHE statistics and trends, with a discussion of the longer-term effectiveness of risk controls<br><br>Interviews with SHE Representatives, supervisors, and workers confirm that regular workplace inspections are conducted across departments by SHE Representatives (scheduled monthly inspections using checklists, identifying hazards, etc.), with identified issues and corrective actions closed out and tracked in Isometrix. Interviews further confirmed that when issues cannot be closed at the departmental level, they are escalated to the Main SHE Committee. Workers interviewed demonstrated awareness of inspection activities in their work areas by SHE Representatives and management.<br><br>The evidence, supported by interviews, indicates that the company has created a joint health and safety committee through which management and workers' SHE representatives carry out regular inspections of the working environment across the mining, engineering, process, and surface departments, and that inspection findings and corrective actions, as well as the long-term effectiveness of risk controls and preventative measures, are regularly reviewed by the committee. |
| 3.2.5.2. | The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows: | ◕ | The evidence indicates that the company carries out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:<br><br>a. A competent professional designs and conducts workplace monitoring, as supported by the Occupational Hygienist Appointment Letter (Anglo American, March 2024) and Certificates |

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| | a. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals;<br><br>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;<br><br>c. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory;<br><br>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<br><br>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. | | of Competency issued by the Occupational Hygiene Training Association (OHTA) (December 2024–June 2025). These documents confirm that the appointed occupational hygienist is qualified in key exposure-related areas, including thermal stress, noise measurement, ergonomics, and hazardous substance monitoring. The hygienist also participated in the design of the Respiratory Protection & Facial Hair Standard (Anglo American, December 2024) and the Integrated SHE Performance Monitoring, Evaluation and Analysis Plan – 2025 (Anglo American, no date). A set of workplace monitoring reports, such as the Personal Dust Monitoring Report Q1 2025, the Underground Personal Dust Monitoring Report (July 2025), and additional hazard-specific technical reports reviewed under Requirement 3.2.5.1, confirm that the competent professional conducts exposure measurements and evaluates control effectiveness.<br><br>b. Health surveillance is carried out in a manner that protects the right to confidentiality of medical information, as supported by the Fitness to Work Procedure (September 2023), the Integrated Employee Health and Wellness Policy (July 2025), and the Records Control Procedure (October 2022). These documents outline confidentiality requirements for managing worker health surveillance information, including restricted access, secure storage, and procedural controls to prevent the use of medical data in ways that could be prejudicial to the worker.<br><br>c. Samples collected for workplace monitoring and health surveillance purposes are analysed in ISO/IEC 17025-certified or nationally accredited laboratories, as supported by the Accreditation Notification for Lancet Clinical Laboratories Zimbabwe (Southern African Development Community |

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| | | | Accreditation Service - SADCAS, April 2025), which covers a set of analyses relevant to health surveillance; and the Certificate of Accreditation under ISO/IEC 17025:2017 awarded to ChemTech Laboratory Services CC (South African National Accreditation System, November 2022), spanning a list of chemical analyses covering air, water, solids, environmental atmospheric dust fall, and environmental stationary emission sources, typically used in workplace monitoring. Both accreditations were found to be valid.<br><br>d. Sample results are compared against national occupational exposure limits (OELs) as supported by the Personal Dust Monitoring Report Q1 2025 and the Underground Personal Dust Monitoring Report (July 2025), which report measured exposure levels and comparison against applicable occupational exposure limits (OEL), as defined in the Code of Practice for Occupational Hygiene on Personal Exposure to Airborne Pollutants (Anglo American, December 2020).<br><br>Interviews with workers and key OHS staff indicate that health surveillance is carried out in a manner that protects the right to confidentiality of medical information (b), and an on-site review of the medical software used to track worker's health as well as interviews with key OHS staff confirmed that the software automatically flags exceedances and that such exceedances as well as control measures are discussed with the worker once identified (e).<br><br>The evidence, supported by interviews, indicates that the company's OHS surveillance program is fully aligned with sub-requirements (b), (c), and (e), and partially aligned with sub-requirements (a) and (d). |

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| | | | The evidence does not include documentation to confirm that worker health surveillance is designed and conducted by a competent occupational health physician or clinical toxicologist (a), and that biological monitoring results (where relevant) are compared against applicable Biological Exposure Indices (BEIs) (d). |
| 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. | ◐ | The evidence reviewed includes SHE Representative Inspections for 2024–2025, Analytical Laboratory Daytime Illumination Survey Report (Anglo American, November 2024), Baseline Occupational Hygiene Risk Assessment – Mining and Services (Anglo American, October 2023), Review of Quantitative Baseline Occupational Hygiene Risk Assessment – Concentrator (Anglo American, March 2017), Baseline Occupational Hygiene Risk Assessment – Smelter (Anglo American, January 2022), Concentrator Illumination Report H1 2025 (Anglo American, May 2025), Surface Main Stores Inspection: Finance Department (Anglo American, January 2024), Smelter Noise Survey Q1 2025 (Anglo American, April 2025), Surface Unki North Tandamanzi Drill Rigs Noise Level Reports (Anglo American, May 2024; Valterra Platinum, June 2025), Hazard and Aspect Identification and Assessment of SHEQ Risks and Opportunities Procedure (UNK-MIN-SHE-PRO-0004) (Anglo American, September 2023), and the SHE Performance Measurement and Monitoring Procedure (UNK-MIN-SHE-PRO-0018) (Anglo American, October 2022).<br><br>The evidence indicates that the company conducts routine inspection and monitoring activities across noise, illumination, and occupational hygiene exposure areas (e.g., illumination surveys from 2024–2025, noise surveys from 2024–2025, and baseline occupational hygiene risk assessments from 2022–2023). These |

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| | | | monitoring results and inspection findings are captured through annual and monthly SHE Representative inspections, updated baseline assessments, and periodic surveys of illumination and noise risk factors. The Hazard and Aspect Identification and Assessment of SHEQ Risks and Opportunities Procedure (Anglo American, September 2023) sets out the process and frequency for reviewing and updating risk assessments and critical controls, while the SHE Performance Measurement and Monitoring Procedure (Anglo American, October 2022) defines measures to verify the effectiveness of controls in the SHE management system. Evidence of updated illumination surveys in 2025 and updated noise reports in 2024–2025 indicates that the company revises assessments periodically.<br><br>Interviews with occupational health and safety (OHS) personnel and SHE representatives indicate that inspection and monitoring results are reviewed at the operational level and inform periodic updates to risk assessments, including the Social and Human Rights Impact and Risk Analysis (SHIRA) and occupational hygiene risk profiles. OHS staff reported that changes in exposure conditions or identified hazards trigger reassessments and discussions during SHE meetings, toolbox talks, and supervisory briefings. Workers interviewed confirmed that updated hazards and controls are communicated directly, primarily through task-level risk assessments, toolbox talks, and refresher safety inductions. Interviews with OHS personnel and a review of safety statistics indicate that fall-of-ground is the highest potential hazard, and that the company has been improving its safety controls around that.<br><br>The evidence, including interviews, indicates that OHS risk assessments, controls, and protective measures are periodically |

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| | | | updated based on inspection and monitoring results, and that updated control or protective measures are communicated to workers through briefings, inductions, or similar events.<br><br>The evidence does not provide details or documentation to confirm that risk management plans, or training and educational materials, are updated as necessary based on inspection and monitoring results. The evidence also does not document any retraining conducted in response to risks identified through monitoring or inspections. |
| 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. | ● | The evidence reviewed includes the NSSA Accident Prevention and Worker's Compensation Scheme (SI 68 of 1990), a set of NSSA Employer's Accident Report Forms (February, April, and May 2025), the Learning From Incidents Procedure (UNK-MIN-SHE-PRO-0023, Anglo American, February 2023), a monthly Lost Time Injuries and Fatal Accidents Report (Anglo American, April 2025), the Mining (Management and Safety) Regulations, Chapter 21:05 (SI 109 of 1990, Government of Zimbabwe), and the Statutory Instrument Communication (Anglo American, July 2022). These documents demonstrate that the company has a process in place to document and investigate workplace injuries and incidents, classify them by priority and type, conduct root cause analyses, implement remedies with defined deadlines and accountabilities, and report incidents as required by national legislation. This is further showcased by the set of Employer's Accident Reports corresponding to injuries recorded in February, April, and May 2025.<br><br>The Lost Time Injuries and Fatal Accidents report exemplifies monthly reporting on serious incidents, in alignment with legal |

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| | | | requirements outlined in the Statutory Instrument Communication, and Mining (Management and Safety) Regulations (SI 109 of 1990).<br><br>The Learning from Incidents Procedure provides a structured process for documenting, reporting, and investigating workplace incidents, including the implementation of corrective and preventive actions.<br><br>Interviews with employees, contractors, and key occupational health and safety (OHS) personnel indicate that systems are in place to document, investigate, and report workplace injuries, accidents, and dangerous occurrences. OHS staff described processes for notifying the competent authority (NSSA) and, where applicable, the Ministry of Mines, as well as engaging internal and external investigators to conduct root cause analyses and assign corrective actions with defined responsibilities and timelines. During the on-site audit, a detailed investigation into a 2025 fatality was reviewed, including the remedial actions taken. Workers interviewed were generally aware that incidents and near misses are reported and investigated and indicated that safety alerts and lessons learned are communicated following incidents.<br><br>The evidence, supported by interviews and an on-site review of documentation, indicates that the company documents and investigates workplace injuries, accidents, and fatalities, reports them to the competent authority in line with national legal requirements, and takes appropriate remedial actions. |
| 3.2.6.1. | The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring | ● | The evidence reviewed includes a sample of Main SHEQ Meeting Minutes (Valterra Platinum, March; June–August 2025), the National Social Security Authority Act, Chapter 17:04 (Government of |

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| | 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. | | Zimbabwe, December 2016), an NSSA Medical Report (May 2025), the Communication, Consultation and Participation Procedure (UNK-MIN-SHE-PRO-0008, Anglo American, October 2020), and the Records Control Procedure (UNK-MIN-SHE-PRO-0011, Anglo American, October 2022).<br><br>These documents indicate that the company maintains key categories of occupational health and safety (OHS) records required by the standard, including risk assessments, workplace monitoring results, and records of occupational injuries and diseases. The NSSA Medical Report (May 2025) demonstrates that health surveillance records and injury-related information are maintained and submitted to the competent authority in accordance with statutory requirements of the NSSA Act.<br><br>The Records Control Procedure (2022) establishes requirements for the retention, storage, and management of SHEQ documentation, including OHS records. The Communication, Consultation and Participation Procedure (2020) outlines how relevant OHS information (e.g., workplace hazards and risks, monitoring results, and incident and accident findings) is communicated internally and externally upon request, including to worker health and safety representatives. The Main SHEQ Meeting Minutes (March 2025) confirm that OHS performance data, including incidents and trends, is shared through established joint structures that include worker representation.<br><br>Interviews with key OHS staff further confirm that OHS records are systematically maintained and used for performance reviews and trend analysis, and that requested information is shared with |

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| | | | workers and their representatives except where confidentiality of medical information must be preserved.<br><br>The evidence, supported by interviews, indicates that the company maintains required OHS records and makes this information available to worker representatives, except where confidentiality rules apply. |
| 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 heath data management system. | ◕ | The evidence reviewed includes the Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, Anglo American, September 2023), which details storage locations, disposal procedures, and the personnel responsible for managing medical records. It also specifies that the Fitness to Work certificates are retained for 40 years. The Records Control Procedure (UNK-MIN-SHE-PRO-0011, Anglo American, October 2022) highlights how confidential records, including medical data, are captured and securely stored electronically.<br><br>Interviews with key occupational health and safety (OHS) and medical personnel indicate that worker health records are centrally managed by designated custodians and are stored in secure systems with controlled access to protect medical confidentiality. Interviewees confirmed that medical and fitness-to-work records can be readily retrieved when required for occupational health purposes. Workers interviewed acknowledged awareness that their medical information is handled confidentially and accessed only by them and authorized medical staff.<br><br>The evidence, supported by interviews, indicates that the company has a data management system that enables worker health data to be readily located and retrieved, and ensures data protected by |

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| | | | medical confidentiality is securely stored. The system includes custodian accountabilities and procedures for maintaining health records, substantially aligning with the intent of the requirement.<br><br>The evidence does not include information to confirm that health and medical records, other than the summarized Fitness to Work certificates, will be retained for a minimum of 30 years. |
| 3.2.6.3. | The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations. | ● | The evidence reviewed includes the Fitness to Work Procedure (UNK-MIN-OHE-PRO-0001, Anglo American, September 2023), the SHE Data Collection and Reporting Procedure (UNK-MIN-OHS-PRO-0001, Anglo American, October 2022), the Communication, Consultation and Participation Procedure (UNK-MIN-SHE-PRO-0008, Anglo American, October 2020), and the Records Control Procedure (UNK-MIN-SHE-PRO-0011, Anglo American, October 2022).<br><br>The Fitness to Work Procedure outlines that workers have access to their personal medical information and specifies how confidential medical records are captured, accessed, retained, and stored. The Records Control Procedure provides guidance on managing confidential records, including medical data, ensuring controlled access and secure storage. The SHE Data Collection and Reporting Procedure aims to ensure accurate SHE reporting throughout the collection, capture, verification, and approval of SHE data, and internal SHE Reporting requirements are outlined in section 9.5. The Communication, Consultation and Participation Procedure states that specific information on occupational health and safety (OHS) issues is communicated internally and externally upon request. This includes information on workplace hazards and risks; applicable control processes and management plans; results of monitoring |

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| | | | and measurements; and details on accidents, incidents, and investigation outcomes.<br>Interviews with a sample of workers, as well as OHS and clinic staff, indicate that medical records are managed by the onsite clinic and are accessible only to the patient and authorized clinic personnel, with access controlled through patient fingerprint authorization. In addition, interviews confirm that workers are able to access their personal information related to accidents, dangerous occurrences, inspections, investigations and remedial actions, as well as health surveillance and medical examination records.<br>The evidence, supported by interviews, indicates that systems are in place to provide workers with access to their personal information related to accidents, dangerous occurrences, inspections, investigations, and remedial actions, as well as health surveillance and medical examination records. |

## Chapter 3.3—Community Health and Safety

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 94% |
| Chapter Score Basis | 17 out of 18 possible points |

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| 3.3.1.1. | Critical. The operating company shall carry out a scoping exercise to identify significant potential risks and impacts | ● | The evidence reviewed includes a set of Environmental and Social Impact Assessments (EISAs), including the initial EIA (Scott Wilson Resources, 2003), the Smelter EIA (Ascon Africa, 2016), an |

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| | 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:<br>a. General mining operations;<br>b. Operation of mine-related equipment or vehicles on public roads;<br>c. Operational accidents;<br>d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);<br>e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);<br>f. Mining-related effects on community demographics, including in-migration of mine workers and others;<br>g. Mining-related impacts on availability of services;<br>h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and<br>i. Increased prevalence of water-borne, water-based, water-related, and vector- | | Environmental Prospectus & Environmental Management Plan Report for the Proposed Unki South Bulk Sample Collection (Black Crystal, September 2021), and a Solar PV Facility ESIA (SLR, 2023). Additional assessments addressing community impacts include the Community Health, Wellbeing and Safety Impact Assessment (BioSwitch Africa, 2024), the Community Health and Safety Impact Scoping Report (Harare Institute of Public Health, 2022), and the Community Emergency Preparedness and Response Plan (CEPRP) (Anglo American, 2025). A combined Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025) was also provided. Further, assessments relating to potential impacts from the Tailings Storage Facility (TSF) include the TSF Vulnerability Assessment (Unki Mine, 2025) and the Guideline for Assessing the Ecological Impact of a Failed TSF at Unki Complex (Valterra Platinum, August 2025).<br>Collectively, these documents indicate that the company has established a scoping framework, as detailed below:<br>a. General mining operations: The set of ESIAs (2003-2023) and a Community Health, Wellbeing and Safety Impact Assessment (2024) identify potential community impacts associated with dust, noise, blasting, and traffic.<br>b. Operation of mine-related equipment or vehicles on public roads: The Community Health and Safety Impact Scoping Report (2022) and the Health Impact Assessment (2024) describe risks related to haul-road traffic, including vehicle–pedestrian interactions and dust emissions. |

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| | 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. | | c. Operational accidents: The SHIRA WRAC (2025) and the CEPRP (2025) identify potential impacts arising from uncontrolled fires, explosions, and chemical spills.<br><br>d. Failure of structural elements such as tailings storage facilities (TSFs): Evidence, including a map showing houses in the flood zone of the TSF (no date), a TSF Vulnerability Assessment (2025), and the TSF Ecological Impact Guideline (2025), indicates that dam-failure scenarios, inundation zones, and population exposure have been assessed. Structural failure risks related to the Lucilia Poort Dam and the Pollution Control Dam are addressed in the SHIRA WRAC (2025) and the CEPRP (2025).<br><br>e. Mining-related impacts on priority ecosystem services: The Biodiversity Specialist Report for a Solar PV Project (Black Crystal, 2023), the TSF Ecological Impact Guideline (2025), and the Community Health, Wellbeing and Safety Impact Assessment (2024) identify dependencies and potential impacts on key ecosystem services, including water, grazing, and air quality, as well as associated community health implications.<br><br>f. Mining-related effects on community demographics: The Community Health, Wellbeing and Safety Impact Assessment (2024) analyses population influx dynamics and associated social pressures, concluding that in-migration remains moderate and primarily concentrated around the lease area.<br><br>g. Mining-related impacts on availability of services: The Community Health, Wellbeing and Safety Impact Assessment (2024) reports increased demand for health, water, and sanitation services.<br><br>h. Hazardous materials and substances: The Community Health, Wellbeing and Safety Impact Assessment (2024) and the SHIRA |

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| | | | WRAC (2025) evaluate risks associated with fuel, reagents, and chemical storage.<br>i. Communicable and vector-borne diseases: The Community Health and Safety Impact Scoping Report (2022) identifies potential increases in malaria, bilharzia, tuberculosis, and HIV/AIDS related to project activities and workforce influx.<br>On-site observations and interviews with governmental authorities, community representatives, and company staff indicate that the company's scoping of potential community health and safety impacts is comprehensive. Community members confirmed their participation in the most recent community health and safety survey and noted that quarterly Community Engagement Forum meetings provide an ongoing mechanism for discussing potential and actual impacts.<br>The evidence, supported by interviews, indicates that the company has undertaken scoping exercises to identify significant potential risks and impacts to community health and safety arising from mining-related activities, covering sub-requirements (a) through (i). |
| 3.3.1.2. | Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure). | ● | The evidence reviewed includes a set of Environmental and Social Impact Assessments (see 3.3.1.1), which identify potential impacts to the community and their health and safety associated with the operation and any operational changes, such as expansions or additions of infrastructure, for the different project phases; as well as the Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025), which identifies hazards associated with construction activities, blasting, transport, tailings management, |

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| | | | and decommissioning, with corresponding preventive measures and control effectiveness ratings; and a Baseline Risk Assessment (Valterra Platinum, October 2025), that integrates both occupational and community exposures across operational phases and defines residual risks requiring long-term monitoring.<br><br>The evidence indicates that the company has assessed risks and impacts to community health and safety that may occur as a result of the mine operation throughout the mine lifecycle. |
| 3.3.1.3. | Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities. | ● | The evidence reviewed includes the Community Health, Wellbeing and Safety Impact Assessment (Bioswitch Africa, 2024), which identifies women, children, older persons, and persons with disabilities as vulnerable or susceptible groups that may experience disproportionate health and safety impacts from mining-related activities. The assessment also describes context-specific exposure pathways and vulnerability factors, including gender roles, mobility constraints, and reliance on community infrastructure. Additional evidence includes the Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025), which further incorporates social vulnerability considerations through the application of vulnerability scores that influence risk likelihood and consequence ratings during scoping and risk prioritisation. Further evidence reviewed includes the Community Health and Safety Management Plan (Anglo American, January 2025), which integrates these vulnerability considerations into stakeholder engagement, risk communication, and emergency preparedness planning, with measures intended to ensure accessibility and inclusivity. In relation to high-consequence scenarios, including potential failures of the |

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| | | | Tailings Storage Facility (TSF) and the Lucilia Poort Dam (LPD), the company has undertaken targeted vulnerability assessments that consider household-level exposure and vulnerability characteristics within the inundation areas (LPD Inundation Area Vulnerability Assessment, Unki Mine, 2024; and TSF Vulnerability Assessment, Unki Mine, 2025). These assessments are used to inform differentiated emergency response and preparedness measures.<br><br>The evidence indicates that the company's scoping processes include consideration of the differential impacts of mining activities on vulnerable or susceptible members of affected communities. |
| 3.3.2.1. | The operating company shall carry out an assessment of risks and impacts to:<br><br>a. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping;<br><br>b. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable. | ● | The evidence reviewed includes the Community Health Wellbeing and Safety Impact Assessment (Bioswitch Africa, 2024), a Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025), and the Operational Risk Management Programme (ORMP) Risk Matrix (Anglo American, 2025). These documents indicate that the company's community health and safety risks and impact assessments consider the following:<br><br>a. The Health Impact Assessment (2024) predicts the nature, likelihood, magnitude, vulnerability, remediability, and social consequences of potential health and safety risks identified during scoping, and analyses exposure pathways, affected population groups, and impact duration across operational and community contexts, including air quality, water safety, occupational hazards, and communicable diseases.<br><br>b. The SHIRA WRAC Register (2025), informed by the Health Impact Assessment and applying the ORMP Risk Matrix, assigns impact |

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| | | | severity, categorizes risks, and identifies priority unwanted events, including those deemed unacceptable and requiring mitigation.<br><br>Interviews with managerial staff confirm that the assessment process considers both the prediction of impacts and their significance, and that the results are used to identify unacceptable risks and inform mitigation measures.<br><br>The evidence, supported by interviews, indicates that the company's assessment process for community health and safety risks and impacts includes an evaluation of the nature, magnitude, extent, and duration of the impact (a), and the significance of the impact (b). |
| 3.3.3.1. | The operating company shall document and implement a community health and safety risk management plan that includes:<br><br>a. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and<br><br>b. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective. | ● | The evidence reviewed includes the Community Health and Safety (CHS) Management Plan (Anglo American, January 2025), a Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025), the Participatory Monitoring Attendance Reports (Unki Mine, 2023-2025), and Air and Water Monitoring Schedules (Unki Mine, 2023-2025), and a Community and Safety Report (Valterra Platinum, September 2025). These documents indicate that the company's community health and safety management plans consider the following:<br><br>a. The CHS Management Plan and SHIRA WRAC Register document preventive and mitigative controls for potential community impacts, including air and water quality, traffic, and communicable diseases. The CHS Management Plan (2025) also assigns responsible parties and specific timelines for implementing additional control measures. |

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| | | | b. The CHS Management Plan specifies monitoring indicators and frequencies, ensuring that identified risks are continuously evaluated and managed through an adaptive, data-driven approach. Participatory monitoring reports confirm collaboration with community representatives in verifying health and environmental outcomes, including air and water quality. The Community and Safety Report indicates ongoing internal tracking of monitoring campaigns and implementation progress.<br><br>Interviews with managerial staff confirm that actions have been developed to mitigate priority unwanted events that may impact communities, such as operational improvements to the TSF to reduce collapse risk, and that ongoing monitoring is conducted to confirm the effectiveness of controls.<br><br>The evidence, supported by interviews, indicates that the company has developed an operational and adaptive Community Health and Safety management system with clearly defined actions, responsibilities, and community participation in implementation and monitoring. |
| 3.3.3.2. | Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation. | ● | The evidence reviewed includes the Community Health and Safety (CHS) Management Plan (Anglo American, 2025) and the Social and Human Rights Impact and Risk Analysis / Workplace Risk Assessment and Control (SHIRA WRAC) register (Valterra Platinum, 2025), which document preventive engineering, design modifications, and procedural controls that eliminate hazards at the source, reflecting a clear prioritization of risk avoidance before minimization or compensation. Supporting evidence includes minutes of the Q3 Community Engagement Forum (CEF) (2024), Masasa Community Meeting records (Unki Mine, 2023), and CHS |

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| | | | Stakeholder Meeting Minutes (Unki Mine, 2025), which indicate participatory identification of potential risks and the selection of prevention-focused strategies.<br>The evidence indicates that the company consistently applies a preventive approach, prioritizing avoidance over remedial or compensatory measures. |
| 3.3.3.3. | The community health and safety risk management plan shall be updated, as necessary, based on the results of risk and impact monitoring. | ● | The evidence reviewed includes the Community Health and Safety Management Plan (Anglo American, January 2025), which replaces the previous 2022 version and was informed by the Community Health, Wellbeing and Safety Impact Assessment (Bioswitch Africa, 2024).<br>The 2025 update reflects consideration of air and water quality monitoring results, updated tailings-related risk assessments, and issues raised through community engagement and grievance mechanisms and indicates that inputs have informed revisions to risk prioritisation, management measures, and preparedness actions within the plan.<br>The evidence indicates that the company updates its Community Health and Safety Management Plan, as necessary, based on the results of risk and impact monitoring. |
| 3.3.4.1. | If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease | — | Not relevant. The evidence reviewed includes the Assessment of Community Health and Safety Impact Scoping Report (Harare Institute of Public Health, 2022) and the Community Health Wellbeing and Safety Impact Assessment (Bioswitch Africa, 2024). Both assessments evaluate potential risks of community and worker exposure to communicable and emerging infectious |

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| | related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:<br>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;<br>b. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and<br>c. Make information publicly available on its infectious disease mitigation program. | | diseases, including HIV/AIDS, tuberculosis, and malaria, associated with mining activities. The assessments include a review of incidence data from the surrounding communities and the mine's clinic and indicate that the risk of malaria in the region is low, HIV prevalence is 2–3% (significantly below the national average of 14.7% reported for 2021), and tuberculosis incidence is low, with no significant impact attributable to the mine's presence. No significant risks associated with other emerging infectious diseases are identified. The assessments further evaluate existing preventive and control measures and conclude that they are appropriate and effective.<br>The evidence indicates that there is no significant risk of community exposure to HIV/AIDS, tuberculosis, malaria, or other emerging infectious diseases related to mining activities. |
| 3.3.4.2. | If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation | — | Not relevant. The evidence reviewed includes the Assessment of Community Health and Safety Impact Scoping Report (Harare Institute of Public Health, 2022) and the Community Health Wellbeing and Safety Impact Assessment (Bioswitch Africa, 2024). Both assessments evaluate potential risks of community and |

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| | strategies shall be applied, as appropriate:<br><br>a. In relation to HIV/AIDS, the operating company shall, at minimum:<br><br>i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;<br><br>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;<br><br>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<br><br>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. | | worker exposure to communicable and emerging infectious diseases, including HIV/AIDS, tuberculosis, and malaria, associated with mining activities. The assessments include a review of incidence data from the surrounding communities and the mine's clinic and indicate that the risk of malaria in the region is low, HIV prevalence is 2–3% (significantly below the national average of 14.7% reported for 2021), and tuberculosis incidence is low, with no significant impact attributable to the mine's presence. No significant risks associated with other emerging infectious diseases are identified. The assessments further evaluate existing preventive and control measures and conclude that they are appropriate and effective.<br><br>The evidence indicates that there is no significant risk of community exposure to HIV/AIDS, tuberculosis, malaria, or other emerging infectious diseases related to mining activities. |

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| | b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.<br>c. In relation to malaria, the operating company shall, at minimum:<br>i. Develop a vector control plan;<br>ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and<br>iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing. | | |
| 3.3.5.1. | The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in:<br>a. Scoping of community health and safety risks and impacts related to mining; | ◕ | The evidence reviewed includes the Community Health Wellbeing and Safety Impact Assessment (Bioswitch Africa, 2024), the Community Health and Safety (CHS) Management Plan (Anglo American, January 2025), records of a CHS scoping meeting with workers from local community (Unki Mine, 2025), Key Community Informant Surveys (no date), Community Engagement Forum (CEF) and Community Environment Committee (CEC) meeting minutes (Unki Mine, 2023–2024), employee questionnaires (no date), and |

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| | b. Assessment of significant community health and safety risks and impacts related to mining;<br>c. Development of prevention or mitigation strategies;<br>d. Collection of any data needed to inform the health risk and impact assessment process; and<br>e. Design and implementation of community health and safety monitoring programs. | | Participatory Monitoring Attendance Reports (Unki Mine, 2023–2025).<br>These documents indicate that the company engages community representatives, including workers who reside in affected communities, in:<br>a. Scoping of community health and safety risks and impacts, informed by stakeholder meetings and worker surveys as outlined in the 2024 Community Health Wellbeing and Safety Impact Assessment;<br>b. Assessment of significant community health and safety risks and impacts, informed by community and worker surveys;<br>c. Development of prevention and mitigation strategies, documented in the CHS Management Plan and informed by communities and workers through CEF and CEC meeting minutes and CHS Scoping meeting records;<br>d. Collection of data to inform the health risk and impact assessment process, supported by surveys and participatory monitoring; and<br>e. Design and implementation of community health and safety monitoring programs, informed by CEF and CEC meetings.<br>Interviews with community members and workers confirmed participation in surveys and ongoing discussion of health and safety risks and mitigation measures through CEF meetings. Some community members stated that they had raised concerns regarding risks associated with children walking to school, including crossing rivers following mine-related resettlement and exposure to increased mine-related traffic where speeding and |

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| | | | reckless driving occur. Community members reported that mitigation measures have been implemented but are not yet fully effective.<br><br>The evidence reviewed indicates that the company has established mechanisms for stakeholder collaboration in community health and safety processes substantially consistent with sub-requirements (a) through (e).<br><br>The evidence, supported by interviews, does not indicate that all health and safety risks identified by stakeholders are consistently incorporated into the formal health risk and impact assessment documentation or clearly reflected in updates to mitigation planning and monitoring programs. |
| 3.3.6.1. | The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available. | ◕ | The evidence reviewed includes the site's Safety, Environment, and Health (SHE) Policy (Valterra Platinum, 2025), which states that the policy and any supporting SHE information will be provided to anyone upon request; photographs documenting public posting of the SHE Policy; Community Health and Safety awareness and grievance mechanism materials (Valterra Platinum, no date); and TSF Awareness Programme materials (Anglo American, 2023–2024); which are all are displayed at publicly accessible locations, such as a local clinic and government office. Additional evidence includes the Stakeholder Engagement Procedure (Valterra Platinum, 2025), records of Community Engagement Forum and Community Environment Committee meeting minutes (Unki Mine, 2023–2024), and Community Health and Safety awareness session records (Anglo American, 2022), which indicate that the company shares summaries of community health and safety risks and impacts, as well as selected air and water monitoring results, with community |

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| | | | stakeholders through in-person meetings and awareness campaigns. Supporting evidence includes Notice of Receipt of Environmental Monitoring Reports issued by the Environmental Management Agency (EMA, April 2025) and confirmed that environmental monitoring reports are submitted to the Environmental Management Agency as part of regulatory reporting requirements.<br><br>The evidence indicates that the company makes certain information related to community health and safety risks, impacts, and monitoring results available to community stakeholders through established engagement mechanisms and to the regulator through formal reporting processes.<br><br>The evidence does not indicate that comprehensive information on community health and safety risks and impacts and associated monitoring results (e.g., full list of risks and impacts, noise monitoring data) is made publicly available in a manner that is broadly accessible to the public. |

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

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 100% |
| Chapter Score Basis | 4 out of 4 possible points |

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| 3.4.1.1. | The operating company shall conduct a screening analysis, based on evidence from credible sources, to determine whether or not the mining project is located in and/or sources minerals from a conflict-affected or high-risk area. | ● | The evidence reviewed indicates that the mining project is not located in or sourcing minerals from conflict-affected and high-risk areas.<br><br>IRMA references Mining in Conflict-Affected or High-Risk Areas (CAHRA) to be aligned with the OECD Due Diligence Guidance, with the objective of preventing mines that operate in, source minerals from, or transport minerals through conflict-affected or high-risk areas from contributing to conflict or the perpetration of serious human rights abuses. By conducting such due diligence, mines can provide purchasers and others with added assurance that the extraction, processing, and transport of minerals or metals from these mines do not contribute to the financing of conflict or serious human rights abuses.<br><br>The evidence reviewed includes CAHRA Screening Assessment memoranda (Valterra Platinum, May 2025; November and December 2025), which document a structured analysis using credible external sources, including the Global Peace Index, the World Justice Project (WJP) Rule of Law Index (Fundamental Rights and Order and Security factors), and the Armed Conflict Location and Event Dataset (ACLED). These sources indicate medium-level conflict and governance risks at the national level (e.g., Global Peace Index score of 2.2/5; WJP Rule of Law score of 0.39/1), but low conflict-related risk at the regional and local levels relevant to the project. ACLED data for November 2025 recorded 37 incidents nationally, with four (4) occurring in Bulawayo (approximately 200 km from the site) and nowhere else in the Midlands Province, where the mine is located. Buttressed by the Heidelberg Conflict Barometer methodology, the screening assessment concludes that regional and local conflict-related risks are low. |

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| | | | This conclusion is supported by a Mining and CAHRA Assessment for the Shurugwi District (Ministry of Local Government and Public Works, July 2025) and a complementary assessment by the Environmental Management Agency (June 2025), which indicate no history of armed conflict, widespread violence, or systematic human rights abuses in the district, confirm that the mine does not source minerals from other operations, and nor identify conflict-related or human rights risks along transportation routes to downstream processing facilities in South Africa.<br><br>In addition, while the EU CAHRA List (Regulation 2017/821, 2025) identifies Zimbabwe as a high-risk area at the national level, it does not identify risks specific to the Shurugwi District or to platinum group metal (PGM) mining. The company's screening therefore concludes that the national designation is not applicable at the regional or local project level.<br><br>Interviews with internal stakeholders, including management, and external stakeholders, including governmental authorities and community representatives, as well as observations made during the on-site audit, did not identify evidence of armed conflict, conflict financing, or serious human rights abuses associated with the project area or its supply and transport chains.<br><br>The evidence, supported by interviews and observations, indicates that the company has conducted a screening analysis using credible sources and has reasonably determined that the mining project is not located in, sourcing minerals from, or transporting minerals through a conflict-affected or high-risk area. |

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| 3.4.1.2. | If a determination is made that the mining project is located in a conflicted-affected or high-risk area or it sources minerals from such areas, then the operating company shall undertake the additional due diligence steps outlined in the remainder of this chapter. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.1.3. | If a determination is made that the project is not located in a conflicted-affected or high-risk area, and no minerals are sourced from those areas, then conflict-related risks shall be monitored at a level commensurate with the potential that the project area may become a conflict-affected or high-risk area and/or minerals from such areas may enter the mine's supply chain. If new risks emerge or previously identified risks intensify, screening shall take place to determine if risks are significant enough to warrant undertaking the additional due diligence steps in the remainder of this chapter. | ● | The evidence reviewed includes the 2024 Monitoring and Evaluation – CAHRAs, Impact and Controls report (Valterra Platinum, 2024), a 2025 CAHRA Assessment spreadsheet (Conflict Assessment of the Unki Operations, Valterra Platinum, 2025), and the Unki Protection Services Presentation (Valterra Platinum, Q4 2025). These documents describe potential conflict-related risks associated with the mining operation including conflicts related to the hiring of labour and community issues, preventative controls and frequency of monitoring. Additional evidence includes CAHRA Screening Assessment memoranda (Valterra Platinum, May 2025; November 2025; December 2025), which outline risk-screening analyses for Zimbabwe based on conflict, governance, and human rights indicators.<br><br>Interviews with the company representative responsible for CAHRA screening confirm that these assessments are conducted annually and updated in response to significant internal or external developments.<br><br>The evidence, supported by interviews, indicates that the company completes annual conflict-related risk monitoring. |

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| 3.4.2.1. | Critical. When operating in or sourcing minerals from a conflict-affected or high-risk area, the operating company shall not knowingly or intentionally cause, contribute to or be linked to conflict or the infringement of human rights by any party, or knowingly provide direct or indirect support to non-state armed groups or their affiliates, public security forces, or private security forces who:<br>a. Illegally control mine sites, transportation routes and upstream actors in the supply chain;<br>b. Illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or<br>c. Illegally tax or extort intermediaries, export companies or international traders. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.2.2. | When operating in a conflict-affected or high-risk area, the operating company shall:<br>a. Adopt and communicate to the public and stakeholders a commitment that when operating in a conflict- | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |

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| | affected or high-risk area the operating company will not knowingly or intentionally cause, contribute to or be linked to conflict or the infringement of human rights by any party;<br><br>b. Maintain documentation on the quantity and dates of mineral extraction; quantity and dates of minerals obtained from other sources (e.g., from ASM); locations where minerals are consolidated, traded or processed; all mining-related taxes, fees, royalties or other payments made to governmental officials for the purposes of extraction, trade, transport and export of minerals; all taxes and other payments made to public or private security forces or other armed groups; identification of all actors in the upstream supply chain; and transportation routes. This information shall be made available to downstream purchasers and auditors and to any institutionalized mechanism, regional or global, with the mandate to collect and process information on minerals from conflict-affected and high-risk areas; | | |

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| | c. Assign authority and responsibility to senior staff with the necessary competence, knowledge and experience to oversee the conflict due diligence processes; and<br><br>d. Ensure that stakeholders have access to and are informed about a mechanism to raise conflict-related concerns or grievances. | | |
| 3.4.3.1. | The operating company shall assess the risks to the company, workers and communities associated with operating in or sourcing minerals from the conflict-affected or high-risk area. Assessments shall include, at minimum:<br><br>a. Analysis of structural, root and proximate causes of the current conflict, and potential triggers of conflict in the area of operation;<br><br>b. Review of the factual circumstances of the operating company's mineral extraction, transport, and, if relevant, mineral sourcing and/or processing; and<br><br>c. Analysis of the risk that any of the company's activities may lead to the direct or indirect infringement of | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |

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| | human rights, support of armed groups or otherwise contribute to conflict. | | |
| 3.4.3.2. | Assessments shall follow a recognized risk assessment methodology, and be carried out and documented by competent professionals. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.3.3. | Assessments shall be based on credible evidence including on-the-ground research, expert advice, and information from consultations with relevant stakeholders, including men, women, children (or their representatives) and other vulnerable groups. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.3.4. | Conflict risk assessments shall be updated at minimum, on an annual basis, and more often if necessitated by the situation. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.4.1. | The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate risks identified through the risk assessment process. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |

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| 3.4.4.2. | The operating company shall collaborate with relevant stakeholders to develop culturally appropriate strategies to prevent or mitigate risks that are relevant to them; to develop performance objectives, timelines and indicators to measure the effectiveness of the risk management strategies; and to update or revise its prevention and mitigation strategies as needed. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.4.3. | If risks to human rights are identified in the assessment, the operating company shall adhere to the requirements in IRMA Chapter 1.3. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.5.1. | The operating company shall implement and monitor the effectiveness of its risk management plan as per the performance objectives, timelines and indictors developed with stakeholders. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.5.2. | If through monitoring or some other means it is discovered that the operating company has unknowingly or unintentionally been complicit in armed conflict or serious human rights abuses in conflicted-affected or high- | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |

| Req # | Requirement | Score | Basis for Rating |
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| | risk areas, the operating company shall immediately cease or change the offending action, mitigate or remediate the impact, and carry out external monitoring of its due diligence activities as per as per IRMA Chapter 1.3. | | |
| 3.4.6.1. | The findings of conflict risk assessments, risk management plans and monitoring shall be reported to senior management of the operating company; and stakeholders, contractors, mine workers and other employees shall be informed of findings that are relevant to them. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |
| 3.4.6.2. | On an annual basis, where the operating company is operating in or sourcing minerals from a conflict-affected or high-risk area, the company or its corporate owner shall publicly report on due diligence undertaken to ensure that its actions are not supporting armed conflict or the infringement of human rights in those areas. | — | Not Relevant. Based on on-site observations, interviews, and evidence reviewed in requirement 3.4.1.1, there is no indication that the mining project is located in or sourcing minerals from a conflict-affected or high-risk area. |

## Chapter 3.5—Security Arrangements

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 100% |
| Chapter Score Basis | 36 out of 36 possible points |

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| 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. | ● | The evidence reviewed includes the Group Human Rights Policy, version 3 (Anglo American, 2021), which is publicly accessible through the company's webpage (https://www.angloamerican.com/~/media/Files/A/Anglo-American-Group/PLC/sustainability/approach-and-policies/hr-policy-document-english-oct-2021.pdf), and expresses the company's commitment to respect human rights and to report any potential or suspected labour or human rights abuse observed in its operations or those of a business partner. The Group Human Rights Policy also indicates that Anglo American is a signatory to the United Nations (UN) Global Compact and the Voluntary Principles on Security and Human Rights (VPSHR), and a supporter of the UN Guiding Principles on Business and Human Rights. Additional evidence includes the Group Responsible Sourcing Standard for Suppliers (Anglo American, October 2024), which is publicly accessible through the company's webpage (https://www.angloamerican.com/~/media/Files/A/Anglo-American-Group-v9/PLC/suppliers/responsible-sourcing/responsible-sourcing-standard-for-suppliers-eng.pdf), and expresses the company's commitment to not provide support to security forces that have |

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| | | | been implicated in the infringement of human rights, breaches of international humanitarian law, or the excessive use of force.<br><br>Interviews with a sample of stakeholders, including government and community members, indicated that the company's operations continue to align with its policies and commitments.<br><br>The evidence, supported by interviews, indicates that the company has adopted and implemented a public policy acknowledging its commitment to respecting human rights in the context of security arrangements. |
| 3.5.1.2. | Critical. The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:<br><br>a. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;<br><br>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 | ● | Security at the site is managed by the company's security personnel in cooperation with the Zimbabwe Republic Police (ZRP), as indicated in a Memorandum of Understanding (MOU) signed in March 2022 between Unki Mines and the ZRP.<br><br>The evidence reviewed includes a Group Human Rights Policy (Anglo American, October 2021), the Voluntary Principles on Security and Human Rights (VPSHR), the 2022 MOU with the ZRP, the Use of Force Procedure (Unki Mine, March 2022), the Arrest and Detention of a Suspect Procedure (Unki Mine, March 2025), and the Use of Firearms Procedure (Unki Mine, March 2021). The evidence indicates that the company has policies and procedures in place regarding the use of force and firearms by private and public security that align with best practices as outlined in the UN Basic Principles on the Use of Force and Firearms, which include:<br><br>a. Security personnel taking all reasonable steps to exercise restraint and utilizing non-violent means before resorting to the use of force, as indicated in the Use of Force Procedure, Arrest and Detention of |

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| | 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. | | a Suspect Procedure, Use of Firearms Procedure, and the Human Rights Policy in line with VPSHR;<br>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, as indicated in the Use of Force Procedure, Arrest and Detention of a Suspect Procedure, Use of Firearms Procedure and VPSHR; and<br>c. Firearms shall only be used for self-defence or defence of others against an imminent threat of death or serious injury, as indicated in the Use of Firearms Procedure and the Arrest and Detention of a Suspect Procedure.<br>Interviews with management and security personnel indicate that these policies and procedures are communicated and implemented, and interviews with workers, contractors, and community stakeholders did not identify any past incidents involving the use of force or firearms. Interviews with security guards confirmed that they are not equipped with firearms.<br>The evidence, supported by interviews, indicates that the company has policies and procedures in place regarding the use of force and firearms of private and public security that align with best practices expressed in the UN Basic Principles on the Use of Force and Firearms and address sub-requirements (a) through (c). |
| 3.5.1.3. | If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum: | ● | The evidence reviewed includes Part B – Appendices of the company's contracts with the security providers Peace Security (2021) and Safeguard Security (2021), which include the Agreements for Services with the security providers. Additional evidence includes the respective Contract Extensions for 2024 to 2026 for both, which indicate that the contracts with Peace Security and |

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| | 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;<br><br>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<br><br>c. Outlines required training for security personnel. | | Safeguard Security remain in force. These documents indicate that valid contracts with private security providers exist, that:<br><br>a. Set out agreed principles that are consistent with the Voluntary Principles on Security and Human Rights (VPSHR) and the operating company's procedures on the use of force and firearms.<br><br>b. delineate respective duties and obligations of the Supplier (Security Company).<br><br>c. Outline required training for security personnel, including training needs on VPSHR, Safety, Health, Environment and Quality (SHEQ), Social Performance, use of force and firearms, and handling of vulnerable groups.<br><br>Interviews with a sample of company personnel, primarily security managers and security provider personnel, indicate that the contracted security services align with this requirement.<br><br>The evidence indicates that the company has signed contracts with private security providers that meet requirements (a) to (c). |
| 3.5.1.4. | If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or similar agreement with public security providers that includes similar provisions to those in 3.5.1.3. | ● | The evidence reviewed includes a Memorandum of Understanding (MoU) agreed upon by Anglo American and the Police Station of Shurugwi (2022) to collaborate on policing activities at Unki Mines, which:<br><br>a. Sets out agreed principles that are consistent with the Constitution, the Voluntary Principles on Security and Human Rights, and the United Nations Basic Principles on the Use of Force and Firearms; |

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| | | | b. Delineates respective duties and obligations with respect to the agreement; and<br>c. Outlines required training for security personnel, wherein it is provided that Unki Mine will take all measures necessary to conscientize police on VPSHR and the UN Basic Principles on the Use of Force and Firearms.<br>Interviews with a sample of company personnel, primarily security managers and security providers, indicate that public security forces are used to provide security to the mining project, and MoUs were signed.<br>The evidence indicates that the company has signed an MoU with the Police Station of Shurugwi that aligns with requirements (a) to (c). |
| 3.5.2.1. | The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment. | ● | The evidence reviewed includes two (2) Security Risk Assessments (Anglo American, 2023-2025), which assess potential human rights issues arising from security arrangements, and the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), which is an internal mechanism used to monitor social and human rights risks across the mine's operations and includes security-related risks. Additional evidence consists of an Environmental and Social Impact Assessment (ESIA) for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which addresses the security and human rights context and impacts/risks associated with the solar PV project and these findings were incorporated in the 2025 Security Risk Assessment.<br>Interviews with key staff confirmed that the company has an established process for identifying and assessing potential risks and |

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| | | | actual human rights impacts, including those linked to its security arrangements.<br>The evidence, supported by interviews, indicates that the company has an ongoing process to assess security risks. |
| 3.5.2.2. | Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall:<br>a. Follow a credible process/methodology;<br>b. Be carried out and documented by competent professionals; and<br>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 | ● | The evidence reviewed includes two (2) Security Risk Assessments (Anglo American, 2023-2025), which assess potential human rights issues arising from security arrangements, and the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), an internal process used to monitor social and human rights risks across the mine's operations, including security-related risks. The documentation reviewed indicates that the assessments:<br>a. Employ a credible methodology, as the assessment reports describe structured approaches and document the use of established impact assessment and stakeholder engagement processes, including documented consultation activities and recorded stakeholder inputs.<br>b. Utilizes the expertise of competent professionals, as indicated by the qualifications and experience of assessment team members documented in materials associated with the Security Risk Assessments; and<br>c. Was informed by consultation with potentially affected communities, workers, and contractors, as evidenced by the Environmental and Social Impact Assessment for the Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which addresses security- and human-rights-related risks and impacts associated |

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| | | | with the solar PV project, and these findings were incorporated into the 2025 Security Risk Assessment.<br><br>Interviews with key staff indicate that the assessments employed a credible methodology and utilized the expertise of an internationally recognized consulting company. Interviews with a sample of stakeholders, including a sample of those who are affected by the project, indicate that they participated in or were consulted for the human rights assessments.<br><br>The evidence, supported by interviews, indicates that the completed assessments comply with sub-requirements (a–c). |
| 3.5.2.3. | The scope of the security risk assessment shall include, but need not be limited to:<br><br>a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups;<br><br>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); | ● | The evidence reviewed includes the company's Security Risk Assessment (Anglo American, 2025) and the ESIA for a Solar PV Facility at Unki Mine (SLR Consulting, June 2023), and indicates that the scope of the security risk assessment includes the following elements:<br><br>a. Identification of security risks to the company, workers, and communities, with consideration of risks to women, children, and other vulnerable groups, as evidenced by the 2025 Security Risk Assessment, which identifies multiple hazards resulting in potential risks to the company, workers, and communities, including vulnerable groups (e.g., elderly persons, women, persons with disabilities, and illiterate individuals), and by the ESIA, which addresses security and human rights related risks, including vandalism, the presence of artisanal miners, and potential human rights risks associated with law enforcement;<br><br>b. Analysis of the political and security context in the host country, as evidenced by the 2025 Security Risk Assessment, which |

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| | c. Analysis of current and potential conflicts or violence in the host country and affected communities; and<br>d. Risks associated with equipment transfers. | | examines risks related to the national political and security situation (including political instability, political violence, and corruption), and by the ESIA, which includes a contextual analysis of the political and security environment in Zimbabwe;<br>c. Analysis of current and potential conflicts or violence in the host country and affected communities, as evidenced by the 2025 Security Risk Assessment, which addresses political violence and security-related concerns in communities in proximity to the mine site; and<br>d. Identification of risks associated with equipment transfers, as addressed in the 2025 Security Risk Assessment.<br>Interviews with key staff indicate that the scope of the security risk assessment was designed to address the elements specified under sub-requirements (a–d).<br>The evidence, supported by interviews, indicates that the scope of the security risk assessment complies with sub-requirements (a–d). |
| 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 evidence reviewed includes the Security Risk Assessment (Anglo American, 2025), which identifies mitigation measures under the column titled “current mitigatory controls.” Additional evidence includes the Security Management Plan and the Voluntary Principles on Security and Human Rights Management Plans (Anglo American, 2024 and 2025), which document control measures for identified risks and impacts, assign responsibility, specify expected completion timelines, and describe monitoring and evaluation activities. Supporting evidence also includes Monitoring and Evaluation Framework matrices (Anglo American, |

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| | | | 2023 and 2024), which describe monitoring of mitigation measures during the respective reporting periods. The evidence indicates that the company has developed and implemented a risk management plan that identifies actions for preventing, mitigating, and remediating identified risks and impacts, including security-related risks. |
| 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. | ● | The Security Risk Assessment (Anglo American, 2025) reveals a potential for risks between affected communities or workers and security providers. The evidence reviewed includes the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Valterra Platinum, October 2025), which documents security-related social and human rights risks across the mine's operations, and the ESIA for the Solar PV Facility at Unki Mine (SLR Consulting, June 2023), which addresses the security and human rights context and associated risks for the project. Supporting evidence includes the minutes of Community Engagement Forum (CEF) and Community Environment Committee (CEC) meetings from Q1 2023 to Q2 2025, which document discussions related to security risks and mitigation strategies. The Security Risk Assessment also documents consideration of potential risks and impacts on vulnerable groups, including women, elderly persons, persons with disabilities, and illiterate individuals. The evidence indicates that the company has held discussions and pursued collaboration with communities to define appropriate mitigation strategies for security and human rights risks. Some of them include: Q2-Community Engagement Forum (CEF) meeting minutes (June 19, 2024); September Workers' Committee meeting minutes (October 22, 2024); and CEF meeting minutes (June 21, 2023); all of which refer to the treatment of |

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| | | | security and related strategies. Additional supporting evidence includes the Stakeholder Engagement Summary Report for 2023 ESIA (SLR, June 2023), which claims alignment with IFC's PS1 (Assessment and Management of Environmental and Social Risks and Impacts) to ensure good practice in stakeholder engagement; and the Security Risk Assessment (Anglo American, 2025), which supports consideration of potential risks/impacts on vulnerable groups (e.g., elderly, women, disabled, illiterate).<br><br>Interviews with key staff indicate that findings are discussed with relevant departments, a Root Cause Analysis is conducted, and corrective actions are developed collaboratively across functions, resulting in the SHIRA (Valterra Platinum, October 2025). Interviews with a sample of stakeholders, supported by the CEF meeting minutes, indicate that they were consulted during the design of mitigation strategies.<br><br>The evidence, supported by interviews, indicates that the company has undertaken actions to promote collaboration with the community to determine culturally appropriate mitigation strategies for security- and human rights-related risks and impacts, taking into account vulnerable groups. |
| 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 | ● | The evidence reviewed includes the Recruitment and Selection Procedure version 7 (Valterra Platinum, July 2025), which requires pre-employment screening for all employees, including internal security personnel, to include criminal background checks (Section 9.17). Sample records of criminal background checks conducted on internal security personnel (June and August 2024) provide evidence that this procedure is being implemented in practice. Additional evidence includes third-party due diligence reports for |

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| | humanitarian law or the use of excessive force. | | private security providers Peace Security and Safeguard (Anglo American, August 2019), which document the company's vetting of these providers prior to engagement and conclude that both were suitable to provide security services at the site. Records of background and criminal history checks for personnel employed by both private security providers (Peace Security: 10 forms, June 2024; Safeguard: 6 forms, March–July 2024) provide evidence that the contractors apply screening controls intended to prevent the hiring of individuals with criminal histories.<br><br>Interviews with a sample of security guards employed by the company's security contractor indicate that background checks were conducted prior to hiring. Interviews with key staff responsible for protection and representatives of security providers confirmed that due diligence procedures are applied during recruitment and contracting to screen security personnel.<br><br>The evidence, supported by interviews, indicates that the company has developed and implemented due diligence procedures to screen company security personnel and private security providers, with controls in place to prevent the hiring of individuals with criminal records, including infringement of human rights, breaches of international humanitarian law, or the use of excessive force. |
| 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 | ● | The evidence reviewed includes a Memorandum of Understanding (MoU) between Anglo American and the Shurugwi Police Station (2022) to collaborate on policing activities at Unki Mines. The MoU includes a commitment by the Police Station to assign only officers without a record of human rights abuses or pending criminal cases. Additional evidence reviewed includes applicable legislation on criminal background checks (Zimbabwe Republic Police |

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| | international humanitarian law or the use of excessive force. | | Regulations) and sample records demonstrating that criminal history screening is conducted for private security personnel (Peace Security: 10 forms, June 2024; Safeguard: 6 forms, March–July 2024).<br><br>Interviews with a sample of company managers (i.e., human resources, security, and safety) and with a sample of security guards employed by the company's security contractor confirmed that background checks are conducted prior to deployment.<br><br>The evidence, supported by interviews, indicates that the company makes a good-faith effort to conduct due diligence to help ensure that public and private security personnel assigned to the mine do not have known records of infringing human rights, breaching international humanitarian law, or using excessive force. |
| 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 | ● | The evidence reviewed includes training materials on Use of Force and Firearms at Unki Mines (Anglo Platinum, no date) and the Voluntary Principles on Security and Human Rights (VPSHR) (Anglo Platinum, no date); a sample competence certificate on the Use of Force and Firearms (Zimbabwe Republic Police, 2023); and multiple training records, including: Use of Force and Firearms (110 participants, Anglo American, 2025); VPSHR training register (77 participants, Anglo American, 2025); Arrest and Detention of a Suspect Procedure (123 participants, Anglo American, 2025); and Mass Unrest and Industrial Action Management Procedure (125 participants, Anglo American, 2025). This documentation indicates that training is provided to company security personnel and relevant staff on ethical conduct, human rights, and the appropriate use of force and firearms prior to deployment and through refresher sessions. Additional evidence reviewed includes Due Diligence Reports for Peace Security and Safeguard Security (Anglo American, |

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| | not received equivalent training from their employers. | | 2021), which confirm that both private security providers deliver training to their personnel on human rights, codes of conduct (ethics), and the use of force and firearms.<br>Interviews with security staff, including outsourced security personnel, confirmed that training on human rights, ethical conduct, the use of force and firearms, and applicable security procedures is provided prior to deployment and refreshed periodically.<br>The evidence, supported by interviews, indicates that the company provides mandatory initial and refresher training to security personnel, incorporating information on ethical conduct, respect for the human rights of workers and affected communities (including vulnerable groups), and the company's policy on the appropriate use of force and firearms. |
| 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 evidence reviewed includes a Memorandum of Understanding (MOU) agreed upon by Anglo American and the Police Station of Shurugwi (2022) to support policing activities at Unki Mine, which includes a commitment by the company to facilitate training for public security personnel on the Voluntary Principles on Security and Human Rights (VPSHR) and the UN Basic Principles on the Use of Force and Firearms. Additional evidence includes declarations signed by four (4) Zimbabwe Republic Police (ZRP) officers confirming receipt of VPSHR-related training facilitated by the company (Anglo American, July 2025). Further evidence reviewed includes a publicly available news article indicating that ZRP officers assigned to mine-related duties have received training on human rights and the appropriate use of force and firearms. |

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| | | | The evidence indicates that the company provides training on human rights and the appropriate use of force and firearms to all public security officers assigned to work at the site. |
| 3.5.5.1. | The operating company shall:<br><br>a. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force;<br><br>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;<br><br>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;<br><br>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 | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), the Reporting and Investigation of Security Incidents Procedure (Anglo American, May 2021), and the Use of Force Procedure, version 01 (Anglo American, March 2022), which demonstrate that the company has developed and implemented a system to:<br><br>a. Document and investigate security incidents, including those involving impacts on human rights or the use of force, as described in the Reporting and Investigation of Security Incidents Procedure and supported by the Grievance Procedure, whose scope includes security- and human rights-related grievances;<br><br>b. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene company policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies, as described in the Reporting and Investigation of Security Incidents Procedure;<br><br>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, as described in the Reporting and Investigation of Security Incidents Procedure;<br><br>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 |

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| | institutions, and cooperate in any investigations or proceedings;<br>e. Provide medical assistance to all injured persons, including offenders; and<br>f. Ensure the safety of victims and those filing security-related allegations. | | cooperate in any investigations or proceedings, as described in the Reporting and Investigation of Security Incidents Procedure;<br>e. Provide medical assistance to all injured persons, including offenders, as described in the Reporting and Investigation of Security Incidents Procedure and the Use of Force Procedure; and<br>f. Ensure the safety of victims and those filing security-related allegations, including through measures to protect complainants from retaliation, as described in the Reporting and Investigation of Security Incidents Procedure.<br>Interviews with key staff and a sample of security guards employed by the company's security contractor indicated that the procedures are understood and implemented in practice. No security incidents involving injuries, fatalities, or credible allegations of human rights abuses were reported during the audit period.<br>The evidence, supported by interviews, indicates that the company complies with sub-requirements (a-f). |
| 3.5.5.2. | In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop | — | Not relevant. The evidence reviewed includes the Unki Grievance Registers (Anglo American, 2024 and H1 2025), which do not include security-related grievances or incidents resulting in injuries, fatalities, or alleged human rights abuses involving community members or workers recorded during the audit period. Additional evidence includes the Group Human Rights Policy (Anglo American, 2021) and the Reporting and Investigation of Security Incidents Procedure (Valterra Platinum, September 2025), which includes the company’s commitments and procedures to inform stakeholders |

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| | strategies to prevent the recurrence of similar incidents. | | about all security incidents and to engage stakeholders in agreeing on prevention and mitigation measures.<br><br>Interviews with a sample of key staff, including security managers and emergency response personnel, indicate that there have been no security-related incidents resulting in injuries, fatalities, or alleged human rights impacts, and that a community awareness campaign related to security measures is planned. Interviews with a sample of stakeholders did not indicate any security incidents or grievances related to access to information on incidents or related investigations.<br><br>The evidence reviewed indicates that there have been no security-related incidents that have resulted in injuries, fatalities or human rights abuses. |
| 3.5.6.1. | If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms. | ● | The evidence reviewed includes the Use of Force Procedure (Anglo American, March 2022), which commits the company to inform community stakeholders, upon request, about its procedures related to the use of force and firearms. Additional evidence includes a presentation on Protection Services prepared for a Community Engagement Forum (CEF) (Anglo American, March 2025), which addressed procedures for the use of force and firearms, and the Q1 CEF Meeting Minutes (Anglo American, March 2025), which record that an explanation of these procedures was provided to attendees. Supporting evidence includes 2023 CEF Meeting Minutes, which record community feedback on security arrangements during the Zimbabwe General Elections, with related mitigation measures reflected in the following Security Risk Assessment (Anglo American, 2023). |

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| | | | Interviews with a sample of affected stakeholders confirm that requests for information on the company's use-of-force and firearms procedures were communicated to the company, and that the company provided responses through community engagement forums.<br><br>The evidence, supported by interviews, indicates that, when requested by community stakeholders, the company has provided information on its procedures for the use of force and firearms. |
| 3.5.6.2. | The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights. | ● | The evidence reviewed includes the Voluntary Principles on Security and Human Rights (VPSHR) Annual Reports (Anglo American, 2022 and 2023), which describe the company's security arrangements and its efforts to manage security in a manner that respects human rights. Additional evidence includes Community Engagement Forum (CEF) Meeting Minutes (Anglo American, December 2023; Q2 2023) and Minutes of a Crime Liaison Committee meeting (Anglo American, March 2024), which document consultations with community stakeholders and local authorities, including the Shurugwi Police Station, regarding the mine's security arrangements and related human rights considerations. Supporting evidence includes 2022 CEF Meeting Minutes, which document community requests for Protection Services to follow up on cases where individuals were handed over to the police to help ensure that human rights were respected; and 2023 CEF Meeting Minutes, which record community feedback on security arrangements during the Zimbabwe General Elections, with related mitigation measures reflected in the following Security Risk Assessment (Anglo American, 2023). |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Interviews with a sample of affected stakeholders and government agencies confirm that the company engages with community members through formal forums (including CEFs) to discuss security arrangements and related human rights considerations.<br><br>The evidence, supported by interviews, indicates that the company consults regularly with stakeholders, including affected communities and host government representatives, about the impact of its security arrangements on those communities, and reports annually on its security arrangements and efforts to manage security in a manner that respects human rights. |
| 3.5.6.3. | Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security. | ● | The evidence reviewed includes the Grievance Procedure (Anglo American, February 2024), which establishes a mechanism for raising issues, grievances, or incidents with social consequences, including matters related to personal and political security. Additional evidence includes Community Engagement Forum (CEF) Meeting Minutes for 2023 Q4 (Anglo American, December 2023) and 2025 Q1 (Anglo American, March 2025), which document communication of the grievance mechanism to community stakeholders; and an Annual Refresher Induction presentation on Social Performance (Anglo American, no date), which references the grievance procedure and supports worker awareness. Supporting evidence includes the Grievance Register (Valterra Platinum, September 2025), which demonstrates that the grievance mechanism is operational and in use.<br><br>Interviews with a sample of affected stakeholders confirmed awareness of the grievance mechanism and understanding of how to apply it to report security-related concerns or grievances. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | The evidence, supported by interviews, indicates that stakeholders have access to and are informed about a mechanism for raising concerns or grievances related to mine security and seeking recourse. |
| 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. | ● | The evidence reviewed includes a Memorandum of Understanding (MoU) agreed between Anglo American and the Police Station of Shurugwi (2022), in which Clause 2.4 (Human Rights Violations) commits the Shurugwi Police Station to investigate any alleged human rights violations associated with its policing activities at Unki Mine and, where necessary, to refer investigations to the Zimbabwe Human Rights Commission. In addition, both the Police Station and the company commit to cooperating with the Zimbabwe Human Rights Commission in the investigation of grievances raised against Public Security Forces. Additional evidence includes Community Engagement Forum (CEF) Meeting Minutes (Anglo American, December 2023; Q2 2023) and Minutes of a Crime Liaison Committee meeting (Anglo American, March 2024), which document consultations with community stakeholders and local authorities, including the Shurugwi Police Station, regarding the mine's security arrangements with public security services.<br><br>Interviews with key staff indicate that the company has made efforts to encourage the host government to make security arrangements accessible to the public. A sample of affected stakeholders and government agencies confirmed that the company engages with community members through formal forums (including CEFs) to discuss security arrangements.<br><br>The evidence, supported by interviews, indicates that the company makes public security arrangements transparent and accessible to |

| Req # | Requirement | Score | Basis for Rating |
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| | | | communities and encourages public security forces and host government authorities to cooperate with independent investigations and be open about their role and responsibilities in providing security at the mine. |

## Chapter 3.6—Artisanal and Small-Scale Mining

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 100% |
| Chapter Score Basis | 8 out of 8 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 3.6.1.1. | When the large-scale mining (LSM) operating company has identified the presence of artisanal and small-scale mining (ASM) entities on the LSM concession or in close proximity to LSM operations, the operating company shall carry out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring. | ● | The evidence reviewed includes the ASM Internal Context Review Revised (Valterra Platinum, 2025) and the ASM External Context (Mining Systems Africa, September 2023), which together assess the legal, social, and environmental context of artisanal and small-scale mining (ASM) activities within and around the mine's area of influence. These documents examine internal and external drivers of ASM activity, including livelihood dependence, governance structures, regulatory conditions, and broader socio-economic factors.<br><br>Additional evidence includes the ASM Management Plan (Valterra Platinum, 2025), which applies the contextual findings to guide engagement, risk mitigation, and monitoring, as well as Monitoring and Inspection Reports (Valterra Platinum, May, July, and August |

| Req # | Requirement | Score | Basis for Rating |
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| | | | 2025) documenting the identification of ASM activities within the concession.<br><br>The evidence indicates that the company has identified the presence of ASM entities in close proximity to its operations and has carried out a scoping process to understand the legal, social, and environmental context in which ASM activities are occurring. |
| 3.6.2.1. | When the operating company has identified the presence of ASM on or in close proximity to its mining project, and where there is no material risk to company personnel, it shall:<br><br>a. Make a good faith effort to engage with ASM entities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts (See IRMA Chapter 1.2);<br><br>b. Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning;<br><br>c. Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and | ● | The evidence reviewed includes the Artisanal and Small-Scale Mining (ASM) Management Plan (Valterra Platinum, 2025), quarterly Community Engagement Forum (CEF) Reports (Anglo American, Q4 2023, Q1 2024, Q2 2024), the ASM Consultation Log (Valterra Platinum, 2025), the ASM Awareness and Results Sharing Report – Chemical and Fire Awareness Raising (Valterra Platinum, no date), and meeting minutes from engagements with the Local Member of Parliament, Councillors, and Traditional Leaders (Valterra Platinum, August and September 2025). Additional evidence includes the Unki Safety Training Empowers Communities Report (Anglo American, May 2024), and a Grievance Procedure Receipt Acknowledgement Letter (Valterra Platinum, October 2025). These documents demonstrate that the company has identified the presence of ASM in close proximity to its mining project, and has:<br><br>a. Engaged with informal and formal ASM entities, as the ASM Management Plan outlines the company's formal approach for engaging ASM groups, including communication protocols, planned touchpoints, and conflict-prevention mechanisms. The ASM Consultation Log provides traceable records of direct interactions with ASM operators, including dates, participants, discussion points, and follow-up actions. |

| Req # | Requirement | Score | Basis for Rating |
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| | d. Inform ASM entities and communities that there is an operational-level grievance mechanism available to raise concerns and resolve conflicts related to the LSM operation (See IRMA Chapter 1.4). | | b. Consulted ASM representatives during risk and impacts assessments, as demonstrated by the quarterly CEF reports (Q4 2023, Q1 2024, Q2 2024), which evidence that ASM-related issues are discussed during multi-stakeholder forums that address operational updates, ongoing closure planning, community concerns, and risk-related topics.<br><br>c. Engaged with communities affected by ASM activities, as demonstrated by meeting minutes from engagements with the Local MP, Councillors, Chiefs, and community leaders (27 August 2025 and 23 September 2025), which evidence that the company engages political and traditional authorities to address ASM-related social, environmental, and safety issues. The CEF reports and the ASM Awareness and Results Sharing Report further indicate ongoing interaction with communities regarding safety hazards, ASM dynamics, and community concerns.<br><br>d. Informed ASM entities and communities about the grievance mechanism, as evidenced by the Q2 2024 CEF report and the Grievance Procedure Receipt Acknowledgement Letter, which both demonstrate that the company informed stakeholders about the availability of an operational-level grievance mechanism and responds formally to submitted grievances.<br><br>Interviews with a sample of community members, including artisanal and small-scale miners, confirm that they have been engaged by the company through regular community forum meetings, and that the same grievance mechanisms apply to them as to other external stakeholders.<br><br>The evidence, supported by interviews, indicates that the company has established an engagement approach with ASM entities and |

| Req # | Requirement | Score | Basis for Rating |
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| | | | surrounding communities that complies with sub-requirements (a-d). |
| 3.6.3.1. | The operating company shall ensure that mine security personnel are trained in respecting the human rights of individuals engaged in ASM activities, and members of affected communities. | ● | The evidence reviewed includes the Peace Security Contract (Valterra Platinum, December 2011), the Peace Security Contract Extension (Valterra Platinum, May 2024), the Safeguard Contract (Valterra Platinum, 2021) and the Safeguard Contract Extension (Valterra Platinum, May 2024), which outline expectations for security providers regarding nonviolent conduct, conflict-management protocols, and alignment with human rights principles in their interactions with community members and artisanal and small-scale mining (ASM) actors. Additional evidence includes the 2024 and 2025 Voluntary Principles on Security and Human Rights (VPSHR) training records (Valterra Platinum, 2024 and 2025), along with the training materials, which demonstrate that the company conducts regular training for security personnel, contractors, and relevant staff on the VPSHR. The materials cover de-escalation, appropriate use of force, human rights obligations, and respectful engagement with communities and ASM entities.<br><br>Interviews with the site's security personnel confirm they have received training on ethical conduct and respect for the human rights of artisanal miners and communities affected by ASM activities.<br><br>The evidence indicates that the company provides training to security personnel on respecting the human rights of individuals engaged in ASM activities and members of affected communities. |

| Req # | Requirement | Score | Basis for Rating |
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| 3.6.3.2. | The operating company shall demonstrate that it has considered opportunities to enhance positive safety, environmental and social impacts of ASM activities for the benefit of ASM entities and host communities. | ● | The evidence reviewed includes the Unki Mines Board Note on Special Mining Lease Chrome Tributing Anglo American, September 2024), which outlines a proposal to formalize chrome tributing arrangements within the Special Mining Lease (SML), with the stated intent of providing regulated access to ore, improving oversight, and creating structured economic opportunities for ASM operators. The ASM Management Plan (Valterra Platinum, 2025) further describes planned engagement approaches, awareness-raising activities, and risk-reduction measures intended to promote safer practices and more constructive relationships with ASM groups.<br><br>Additional evidence includes a Socio-Economic Development Plan for 2023-2027 (Unki Mines, no date), which identifies broader community development initiatives such as skills development, infrastructure support, and livelihood diversification, that may indirectly benefit ASM households and host communities affected by ASM activity. A Legacy Chrome Pit Rehabilitation Update Report (Valterra Platinum, 2022) and Updated Rehabilitation Status Photos (Unki Mines, 2025) document the company's ongoing rehabilitation of legacy mining areas previously associated with ASM activities, as well as three (3) SML Monitoring and Inspection Reports (Valterra Platinum, 2025), which demonstrate regular monitoring of illegal mining activities within the mining lease to identify safety issues, environmental concerns, and operational challenges. Additional supporting evidence includes the two (2) Community Engagement Forum (CEF) Reports (Valterra Platinum, Q2 2024 and Q4 2023), which demonstrate that ASM-related matters are discussed as part of community engagement processes, allowing community leaders, mine representatives, and other stakeholders to raise issues and |

| Req # | Requirement | Score | Basis for Rating |
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| | | | share updates relevant to ASM safety, environmental management, and local social impacts. The company has distributed brochures educating about health, safety and environmental risks associated with ASM and mitigation measures with some communities (Valterra Platinum, no date).<br><br>Interviews with company personnel and community stakeholders indicate that discussions regarding artisanal mining under concession agreements are at an initial and informal stage only.<br><br>The evidence indicates that the company has explored and documented potential opportunities to enhance positive ASM-related outcomes for the benefit of ASM entities and host communities in consultation with potentially affected stakeholders.<br><br>The company's efforts to improve will be reassessed during the surveillance audit. |
| 3.6.4.1. | When the LSM mine sources minerals from or has other commercial relationships with ASM entities, the operating company shall:<br><br>a. Regularly assess the social and environmental risks and impacts related to the ASM entities with whom they have a commercial relationship;<br><br>b. Collaborate with those ASM entities with whom it can legally and legitimately engage to develop and implement a plan to eliminate or | — | Not relevant. Interviews with managerial staff confirmed that small-scale chrome mining tributes previously issued within the Special Mining Lease (SML) were cancelled in 2017, as directed by the Provincial Mining Director. Interviews with company personnel and community representatives further confirmed that no ASM materials currently enter the mine's supply chain and that no commercial arrangements with ASM entities are in place.<br><br>The company reported that, following recent consultations with government authorities and local leadership, it is in the early stages of drafting concessionary agreements that would allow for chrome mining within the SML as a form of economic relief for local communities affected by regional drought. Community interviews corroborated the finding that no agreed-upon framework or |

| Req # | Requirement | Score | Basis for Rating |
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| | mitigate the most significant risks, and over time, address other social and environmental risks related to those ASM operations; and<br>c. Periodically monitor the effectiveness of mitigation strategies, and adapt plans as necessary to facilitate continued minimization of risks. | | pathway for engagement currently exists and that discussions are at an initial informal stage.<br>The applicability of this requirement will be re-assessed during the next IRMA audit. |
| 3.6.4.2. | When the LSM mine has commercial relationships with ASM entities that are located in conflict-affected or high-risk areas, the operating company shall carry out due diligence related to those ASM entities as required in IRMA Chapter 3.4. | — | Not relevant. The evidence reviewed for Chapter 3.4 indicates that the mine and the surrounding ASM mines are not located in conflict-affected or high-risk areas. |

## Chapter 3.7—Cultural Heritage

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 94% |
| Chapter Score Basis | 22.5 out of 24 possible points |

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| 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. | ● | The evidence reviewed includes the Cultural Heritage Management Plan (Anglo American, May 2024) prepared by an in-house stakeholder engagement and communications officer; and the Specialist Cultural Heritage Report for a Solar Photovoltaic Facility (Black Crystal and SLR Consulting, December 2022) associated with the Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023). The plan and the assessment were prepared by a specialist with over 30 years of professional experience in archaeology, history, ethnography, geology, and botany.<br><br>Interviews with relevant company staff indicated that cultural heritage assessments are performed by professionals qualified by the National Museums and Monuments of Zimbabwe (NMMZ). An interview with the District Environmental Officer of the Environmental Management Agency (responsible for approving ESIAs and monitoring reports) confirmed that the cultural heritage reports are prepared by NMMZ-qualified professionals.<br><br>The evidence indicates that the company has conducted screening, assessment, and developed and implemented mitigation measures for all sites in collaboration with competent professionals. |
| 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. | ● | The evidence reviewed includes the Cultural Heritage Management Plan (Anglo American, May 2024), which indicates that the plan was developed based on previous consultations conducted with potentially affected people from Dzikamidzi, two (2) local chiefs, the Ward 19 councilor, representatives from SLR and Black Crystal Consulting, the National Museums and Monuments of Zimbabwe Provincial Office (including the regional director and archaeologist) and, the Chief Curator; Environmental and Social Impact |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023) which demonstrates that stakeholder consultations including on Cultural Heritage, were conducted with local authorities, traditional leaders, government departments, and local communities from Masasa-Gutsa, Dzikamidzi, Adare Farm, Gutsaruzhinji, Makwikwi, Hwinya, and nearby villages, as captured in the associated Stakeholder Engagement Summary Report (SLR Consulting, June 2023); Letter (Cultural Heritage Clearance Certificate) issued by the Curator of the National Museums and Monuments of Zimbabwe to the Director of Black Crystal Consulting (March 2023), following issuance to the Department, a copy of the ESIA (2023), which formed the basis for issuance of the Cultural Heritage Clearance Certificate; and the Community Engagement Forum Meeting Minutes for Quarter 2 and 3, documenting meetings held at Nyathi Camp in June 2024 and September 2024 indicating action items around the Community Engagement Forum (CEF) members ensuring that they share posters about the Chance Finds Procedure with the communities they represent.<br><br>Interviews with relevant company staff indicate that affected communities were consulted on cultural heritage as part of the ESIA consultation process and through the CEF. An interview with the District Environmental Officer of the Environmental Management Agency (responsible for approving ESIAs and monitoring reports) confirmed that affected communities had been informed and consulted on both tangible and non-tangible cultural heritage. Interviews with community members indicated knowledge of the Chance Find Procedure. |

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| | | | The evidence, supported by interviews, indicates that screening, assessment and the development of mitigation measures and procedures related to the management of cultural heritage included consultations with relevant stakeholders. |
| 3.7.1.3. | Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues. | ● | The evidence reviewed includes the Unki Mines Safety, Health and Environment (SHE) Management Policy (Valterra Platinum, May 2025), which commits to open and transparent communication with stakeholders, amongst others; the Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023), which demonstrates that the company disclosed the ESIA, including the associated Specialist Cultural Heritage Report (Black Crystal and SLR Consulting, December 2022), in accordance with Zimbabwe's Environmental Management Act (Cap 20:27) and the Environmental Management (Environmental Impact Assessment and Ecosystems Protection) Regulations, SI No. 7 of 2007. The ESIA was published on the SLR website and made publicly available in both English and Shona through online disclosure and physical distribution of a Non-Technical Summary at designated public locations during a 30-day disclosure period (May 11 to June 12, 2023), including the Tongogara Rural District Council offices, Chachacha TRDC sub-office, Shurugwi Town Council offices, District Development Coordinator's Office, Chironde Clinic, Unki Mine, and the Impali housing office. A public meeting was also held at Unki Mine on May 18, 2023, where a presentation on the ESIA (2023) was made, and copies of the ESIA Non-Technical Summary were distributed to attendees. The public disclosure followed notifications made in national newspapers, messages sent via text (SMS and WhatsApp, where phone numbers were available), email notifications to registered stakeholders with |

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| | | | the Non-Technical Summary attached, and postings on notice boards at strategic locations. The Stakeholder Engagement Summary Report (SLR Consulting, June 2023) documents these disclosure activities and associated records. The evidence also includes correspondence between the mine and the Department of National Museums and Monuments (May 2023), indicating that the company provides information on its cultural heritage to stakeholders upon request.<br><br>Interviews with relevant staff indicate that stakeholders would be provided with cultural heritage-related information upon request.<br><br>The evidence, supported by interviews, indicates that the company makes its cultural heritage assessments publicly available and provides related information to stakeholders upon request. |
| 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. | ● | Unki is an existing mine with expansions. The evidence reviewed includes the Cultural Heritage Management Plan (Anglo American, May 2024), which contains the results of the cultural heritage screening undertaken within the mine's primary and defined areas of influence. The CHMP identified cultural heritage present, taking into account its replicability and criticality, with reference to the framework outlined in IFC Performance Standard 8 (2012). Specialist Heritage Reports were prepared for specific expansion projects, including a Solar PV Project (2022) and a Bulk Sampling Project (2021). The documentation reviewed indicates that cultural heritage considerations were incorporated into project planning for these developments. A cultural heritage registry has also been maintained in connection with these expansion activities. |

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| | | | Interviews with the relevant company representatives indicated that the CHMP was implemented for these expansion projects and that screening was conducted prior to implementation.<br><br>The evidence reviewed, supported by interviews, indicates that the company undertook a screening process to identify risks and potential impacts to replicable, non-replicable, and critical cultural heritage in advance of significant changes to mining-related activities. |
| 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. | ● | The evidence reviewed includes the Cultural Heritage Management Plan (Anglo American, May 2024), which documents the results of the Cultural Heritage screening and assessment, identifying the locations of 58 cultural heritage observations (archaeology, burial grounds, rock art, historical, living heritage, and intangible practices) within the mine's defined and primary areas of influence, classifying them according to their replicability (replicable or non-replicable), cultural heritage class (tangible or intangible) as well as, their significance (high, medium, low, or to be determined) in alignment with IFC Performance Standard 8 requirements. In this Plan, the company additionally identifies mitigation measures based on the type of cultural heritage likely to be affected, in line with mitigation hierarchy principles to avoid, minimize, restore, or compensate for adverse impacts. Roles and responsibilities, monitoring indicators, and provisions for conservation addenda to adapt to changing project conditions are also outlined, demonstrating a structured approach to mitigating impacts on cultural heritage consistent with IRMA criteria 3.7.3, 3.7.4, 3.7.5, and 3.7.6 – see findings below. |

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| | | | The evidence indicates that the company has assessed the nature and scale of the potential impacts and proposed mitigation measures to avoid, minimize, restore, or compensate for adverse impacts. Mitigation measures are consistent with the requirements under IRMA criteria 3.7.3, 3.7.4, 3.7.5, and 3.7.6, based on the type of cultural heritage likely to be affected. |
| 3.7.3.1. | 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:<br><br>a. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it;<br><br>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; | ◐ | The evidence reviewed includes the Cultural Heritage Management Plan (CHMP) (Anglo American, May 2024), which indicates that the company has encountered a total of 42 observations of tangible replicable cultural heritage. Additionally, it describes the company's approach to management and mitigation measures, which follow the mitigation hierarchy, with avoidance of impacts as the primary principle. It documents the company's minimisation measures such as the redesign of project footprints, establishment of buffer zones and condition assessments. For replicable sites of medium significance, it prescribes site-specific conservation management plans approved by the National Museums and Monuments of Zimbabwe (NMMZ), condition assessments and stakeholder consultation. The plan also outlines the use of alternative restoration strategies, including reproducing cultural elements through digital imaging and canvas projection, to ensure spatial and symbolic continuity. While this example pertains to a non-replicable site, the same methodology is referenced for replicable sites where relocation or reproduction is appropriate. The plan emphasises that the permanent removal of artefacts and structures is considered only after all other mitigation options have been exhausted and is subject to approval by the relevant authorities, specifically the NMMZ. Site Development (Anglo-American, no date) highlights the application of alternative restoration strategies including |

| Req # | Requirement | Score | Basis for Rating |
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| | c. Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archaeological artifacts and structures; and<br><br>d. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage. | | reproduction of cultural elements using digital imaging and canvas projection, ensuring spatial and symbolic continuity, and discusses provisions for compensation for loss of cultural heritage used for long-standing cultural purposes including community archaeology initiatives, development of educational resources, and proposals for a local eco-museum to promote cultural heritage and strengthen community engagement. The Specialist Cultural Heritage Report for a Solar Photovoltaic Facility (Black Crystal and SLR Consulting, December 2022) and Specialist Cultural Heritage Report for a Bulk Sampling Area (Black Crystal and SLR Consulting, December 2021) describe and classify the sites and present recommendations for management based on the mitigation hierarchy.<br><br>Interviews with the company's cultural heritage specialists indicated that no mitigation measures for cultural heritage were deemed necessary, except for the Impali rock art, which is classified as tangible non-replicable cultural heritage (see 3.7.4.1); and no material has been removed.<br><br>The evidence indicates that the company has developed a cultural heritage management plan and reports specific to expansion activities, which favours avoidance of impacts, and where that is not feasible, follows the mitigation hierarchy of minimize, rectify, reduce, remove, and offset; and that the Solar Photovoltaic Facility avoids all identified tangible replicable cultural heritage.<br><br>The evidence does not include documentation to determine whether all tangible replicable cultural heritage has been avoided, or if some sites were affected by mining activities, or, if impacts occurred, whether the company implemented mitigation measures prioritizing avoidance and, where avoidance was not feasible, followed the mitigation hierarchy (particularly tangible replicable |

| Req # | Requirement | Score | Basis for Rating |
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| | | | cultural heritage sites identified for the Unki Bulk Sampling Area). Therefore, it is not possible to determine if all the sub-requirements are relevant or have been met. |
| 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. | ◕ | The evidence reviewed includes the Cultural Heritage Management Plan (CHMP) (Anglo American, May 2024), which indicates that the company has encountered a total of 42 observations of tangible replicable cultural heritage within its primary (24 encounters) and defined (18 encounters) areas of influence.  The Specialist Cultural Heritage Report for a Solar Photovoltaic Facility (Black Crystal and SLR Consulting, December 2022) and Specialist Cultural Heritage Report for a Bulk Sampling Area (Black Crystal and SLR Consulting, December 2021) indicate a qualified professional classified the sites and proposed appropriate mitigation.<br><br>Interviews with the company's cultural heritage specialists indicated that avoidance of tangible culture heritage identified by qualified professionals has generally been implemented, including the Impali rock art, which is classified as tangible non-replicable cultural heritage (see 3.7.4.1).<br><br>The evidence, supported by interviews, indicates that mitigation planning for tangible replicable cultural heritage has been undertaken and documented by qualified cultural heritage professionals, using internationally recognized practices, including site identification, classification, and the development of avoidance-focused management and mitigation measures.<br><br>The evidence does not include documentation to determine whether tangible replicable cultural heritage has been managed by |

| Req # | Requirement | Score | Basis for Rating |
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| | | | qualified professionals according to the mitigation hierarchy in cases where avoidance has not been documented (see 3.7.3.1). |
| 3.7.4.1. | The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:<br>a. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and<br>b. Any removal of cultural heritage is conducted using the best available technique. | — | Not relevant. The evidence reviewed includes the Cultural Heritage Management Plan (CHMP) (Anglo American, May 2024), which indicates that the company has recorded 14 observations of tangible, non-replicable cultural heritage within its primary (11 encounters) and defined (3 encounters) areas of influence. The Impali Rock Art Site is identified as a tangible, non-replicable cultural heritage site in the CHMP and a cultural heritage registry (no date), and a presentation of the Impali Rock Art Site Development (Anglo American, no date) confirms that the site was not removed.<br>Interviews with relevant staff indicate that the company has not removed, does not plan to remove, and does not expect any potential impacts on any tangible, non-replicable cultural heritage. |
| 3.7.4.2. | All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage. | ● | The evidence reviewed includes the Cultural Heritage Management Plan (CHMP) (Anglo American, May 2024), which indicates that the company has encountered a total of 14 observations of tangible non-replicable cultural heritage; a PowerPoint Presentation Impali Rock Art Site Development (Anglo-American, no date) which indicates that, the company, in partnership with the Department of National Museums and Monuments of Zimbabwe (NMMZ) represented by a team of curators (one of whom had over 17 years of professional experience in archaeology, heritage research and conservation), a surveyor, and artists undertook mitigation work at the Impali Rock Art Site between 2015 and 2017 with mitigation work involved; mapping, cleaning using non-invasive methods, |

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| | | | digital imaging and, reproduction of the paintings on canvas; CV of one (1) of the team members from the Department of National Museums and Monuments of Zimbabwe that was involved in mitigation work for the Impali Rock Art Site Development Project, Phase 1.<br><br>Interviews with relevant staff confirm that no mitigation work has been carried out since 2017, and that any future mitigation work will be carried out by the Department of National Museums and Monuments with the site as collaborator.<br><br>The evidence indicates that mitigation work involving tangible, non-replicable cultural heritage undertaken thus far has been carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage. |
| 3.7.5.1. | 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:<br><br>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 | — | Not relevant. Interviews with relevant staff indicate that, to date, the company has not identified any critical cultural heritage. |

| Req # | Requirement | Score | Basis for Rating |
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| | 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). | | |
| 3.7.5.2. | When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:<br>a. Comply with the requirement 3.7.5.1;<br>b. Comply with the protected area's management plan;<br>c. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key | — | Not relevant. Unki is an existing mine with expansions and does not currently plan to develop a new mine within a legally protected cultural heritage area. The evidence, an initial Environmental Impact Assessment (EIA) (2003), a Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., September 2020), a Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (Nhiwatiwa et al., 2022), and Critical Habitat Assessment for the Solar PV (SLR, October 2022), indicate that the mine concession is not located in UNESCO World Heritage Sites, core areas of UNESCO biosphere reserves and IUCN Protected area management categories I-III. The mine is also not located in the two (2) areas (Ziwa National Monument and Naletale Cluster of Dzimbabwes) currently on Zimbabwe's official Tentative List for World Heritage Site Inscription. |

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| | stakeholders on the proposed mining project; and<br>d. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. | | |
| 3.7.5.3. | IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).<br>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;<br>• International Union for Conservation of Nature (IUCN) protected area management categories I-III;<br>• Core areas of UNESCO biosphere reserves. | — | Not relevant. Unki is an existing mine with expansions located in a concession area that does not intersect with a World Heritage Site, a protected area designated as IUCN management categories I-III, or any core area of UNESCO biosphere reserves. The evidence, an initial Environmental Impact Assessment (EIA) (2003), a Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., September 2020), a Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (Nhiwatiwa et al., 2022), and Critical Habitat Assessment for the Solar PV (SLR, October 2022), indicate that the mine concession is not located in UNESCO World Heritage Sites, core areas of UNESCO biosphere reserves and IUCN Protected area management categories I-III. The mine is also not located in the two (2) areas (Ziwa National Monument and Naletale Cluster of Dzimbabwes) currently on Zimbabwe's official Tentative List for World Heritage Site Inscription. |
| 3.7.5.4. | An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:<br>a. The mine was developed prior to the area's official designation; | — | Not relevant. Unki is an existing mine, and the mine concession is not located in or overlapping with a protected area. The evidence, an initial Environmental Impact Assessment (EIA) (2003), a Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., September 2020), a Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (Nhiwatiwa et al., 2022), |

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| | 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<br><br>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. | | and Critical Habitat Assessment for the Solar PV (SLR, October 2022), indicate that the mine concession is not located in UNESCO World Heritage Sites, core areas of UNESCO biosphere reserves and IUCN Protected area management categories I-III. The mine is also not located in the two (2) areas (Ziwa National Monument and Naletale Cluster of Dzimbabwes) currently on Zimbabwe's official Tentative List for World Heritage Site Inscription. |
| 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. | ● | The evidence reviewed includes the Memo on Indigenous Peoples in the Context of Valterra Platinum Operations (Valterra Platinum, September 2025), which concludes that there is no indication that Indigenous or traditional peoples have legal or customary rights or interests adversely affected by the mining operations.<br><br>Interviews with company personnel, community members, local NGO members, and government agencies, supported by company-provided documentation and the audit team's research, do not indicate the presence of Indigenous or traditional people in the project area, including those living in voluntary isolation.<br><br>The evidence, supported by interviews and on-site observations, indicates that the company has not carried out new exploration or development in areas known to be inhabited by Indigenous Peoples living in voluntary isolation and is not planning on doing so. |

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| 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. | — | Not relevant. Interviews with relevant staff indicate that the company is not using, nor proposing to use, the intangible cultural heritage of local communities. |
| 3.7.6.2. | The operating company shall not proceed with such commercialization unless it:<br>a. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and<br>b. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions. | — | Not relevant. Interviews with relevant staff indicate that the company is not using, nor proposing to use, the intangible cultural heritage of local communities. |

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| 3.7.6.3. | Where the operating company proposes to use Indigenous Peoples' cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the Indigenous Peoples. | — | Not relevant. Interviews with relevant staff indicate that the company is not using, nor proposing to use, the intangible cultural heritage of local communities. |
| 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 reviewed includes the Cultural Heritage Chance Finds Procedure (Anglo American, August 2022), which provides appropriate cultural heritage chance find response guidelines consistent with the Group Standards and in accordance with international standards of good practice; the Cultural Heritage Management Plan (Anglo American, May 2024), which defines the cultural heritage management requirements to be undertaken to prevent negative impacts on identified cultural heritage and maintain or enhance the cultural significance of cultural heritage and the landscape, outlining management and mitigation measures commensurate with the cultural significance of identified cultural heritage following established mitigation hierarchy principles.<br>The evidence indicates that the company has developed a cultural heritage management plan outlining actions and mitigation measures to protect cultural heritage. |
| 3.7.7.2. | If a new or existing mine is in an area where cultural heritage is expected to | ● | Unki is an existing mine with expansions. The evidence reviewed includes the Cultural Heritage Chance Finds Procedure (Anglo |

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| | be found, the operating company shall develop procedures for:<br><br>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;<br><br>b. Managing potential impacts to cultural heritage from contractors and visitors;<br><br>c. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and<br><br>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. | | American, August 2022) and the Cultural Heritage Management Plan (Anglo American, May 2024). These documents outline:<br><br>a. A clear, step-by-step process for managing chance finds (Cultural Heritage Chance Finds Procedure, Anglo American, August 2022), including the immediate cessation of work, securing of the site, notification of supervisors, and evaluation by competent cultural heritage professionals before any resumption of activities. The procedure explicitly requires that chance finds not be further disturbed until appropriate assessment and management actions are defined in accordance with the requirements of this chapter.<br><br>b. Application of the Chance Find Procedure to all employees, contractors, sub-contractors, and other service providers operating within the Unki Special Mining Lease surface rights area, ensuring consistent site-wide requirements for the identification and protection of cultural heritage. In addition, the Cultural Heritage Management Plan (Anglo American, May 2024) requires ongoing cultural heritage awareness training for employees and contractors with site access, including training on chance finds procedures, to reduce the risk of inadvertent impacts to cultural heritage from contractor and visitor activities.<br><br>c. Provisions requiring consultation with affected communities to facilitate continued access to cultural heritage sites that were previously accessible and that are being used, or have been used, within living memory for long-standing cultural purposes. The Cultural Heritage Management Plan (Anglo American, May 2024) states that recommendations are to be made for continued access to such sites and that consultation with affected communities is to |

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| | | | include provisions for continued access or alternative access routes, subject to overriding health, safety, and security considerations<br><br>d. Not applicable. Evidence reviewed for Chapter 2.2 indicates that no Indigenous Peoples, as defined under IFC Performance Standard 7, or their cultural heritage are present within the mine's primary or defined areas of influence.<br><br>Interviews with relevant staff indicated that access to archaeological sites may be temporarily restricted due to safety perimeters around active construction equipment, such as during the solar photovoltaic installation project. Staff explained that the company intends to maintain access to heritage sites and will work with stakeholders to facilitate access to sites that are temporarily inaccessible upon request (c). On-site observations confirmed that fencing is limited to active mining and construction areas, while the remainder of the Special Mining Lease remains accessible to surrounding communities.<br><br>The evidence, supported by interviews, indicates that the company has developed procedures aligned with sub-requirements (a),(b) and (c), , and that sub-requirement (d) is not applicable. |
| 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. | ● | The evidence reviewed includes the Cultural Heritage Chance Finds Procedure (Anglo American, August 2022), which requires all personnel, particularly those involved in earthworks and excavations to undergo cultural heritage training focused on identifying potential cultural heritage items or sites; and the Cultural Heritage Management Plan (Anglo American, May 2024), which requires continuous Cultural Heritage awareness training to be provided to all employees and contractors that may access the area, including |

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| | | | on Chance Finds Procedure awareness. Supporting evidence reviewed includes attendance registers for the Social Way Induction Training sessions (December 2024, March 2024, May 2025, August 2025, and November 2025); attendance register for the toolbox talk on the Cultural Heritage Management Plan (8th April 2024), PowerPoint presentation on Social Performance Induction Training Materials (2024 and 2025); Anglo American Social Performance Toolbox Talk Topic: Our commitment to cultural heritage protection (July 2024), and Anglo American Social Performance Toolbox Talk Topic: Culturally Appropriate Engagement (August, 2024).<br><br>Interviews with workers, including a sample of those involved in earth movement indicated that they were aware of cultural heritage-related procedures.<br><br>The evidence, supported by interviews, indicates that the company ensures relevant employees receive training in cultural awareness, recognition and care of cultural heritage sites, and company procedures for cultural heritage management. |

# Principle 4: Environmental Responsibility

## Chapter 4.1—Waste and Materials Management

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 92% |
| Chapter Score Basis | 51.5 out of 56 possible points |

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| 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. | ● | The evidence reviewed includes a policy on Processed Mineral Residue Facilities (MRF) and Water Management Structures (WMS) (Valterra Platinum, June, 2025), which communicates the company's commitment to the safe and responsible management of the MRFs and WMSs through the protection of public health and safety, responsible management of MRFs and WMSs towards the Zero Harm objective, allocation of appropriate resources to support MRFs and WMSs risk management activities and the implementation of an integrated risk management system through the engagement of all relevant participants. Additional evidence reviewed includes Waste Management Standard (Valterra Platinum, August 2025), which establishes a framework that promotes the development of a sustainable solid waste management program and prioritizes the elimination of risk to human health, safety, the environment, and surrounding communities.<br><br>Interviews with relevant staff confirm that these policies are signed off on and that they guide on-site waste management practices. |

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| | | | The evidence, supported by interviews, indicates that the company has developed a policy for managing waste materials and mine waste facilities in a manner that, if practicable, eliminates and, otherwise, minimizes risks to human health, safety, the environment, and communities. |
| 4.1.1.2. | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:<br><br>a. Having the policy approved by senior management and endorsed at the Director/Governance level of the company;<br><br>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;<br><br>c. Having procedures and/or protocols in place to implement the policy; and<br><br>d. Allocating a sufficient budget to enable the effective implementation of the policy. | ◔ | The evidence reviewed includes a Policy on Processed Mineral Residue Facilities (MRF) and Water Management Structures (WMS) (June 2025); the Waste Management Standard (Valterra Platinum, August 2025); an updated Operating, Maintenance and Surveillance (OMS) Manual for the Unki Mine Tailings Storage Facility (TSF) (Knight Piésold Ltd., April 2025); training attendance records for Trigger Action Response Plans (TARPs), Engineer of Record (EoR) training, and the OMS Manual refresher (December 2024); an operational standard on the Tailings Facility Management System (TFMS) (Valterra Platinum, July 2025); the EoR succession planning letter (May 2025); the EoR appointment letter (May 2025); and site budgets (Global Industry Standard on Tailings Management (GISTM)/Tailings Budgets (2024 and 2025), November 2024).<br><br>The evidence indicates that the company's implementation of waste management policies is supported as follows:<br><br>a. The Waste Management Standard states that it is approved by the General Manager, and the Processed MRF and WMS Policy states that it is endorsed by the company's Board of Directors.<br><br>b. The Processed MRF and WMS Policy defines roles and responsibilities for Operations Managers and Supervisors and references a maintained accountability matrix for executives responsible for processed MRFs and WFMs. The OMS Manual and |

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| | | | training records (December 2024) indicate that relevant TSF personnel receive training aligned with their responsibilities. EoR appointment and succession planning documentation demonstrate that the appointed EoR has appropriate authority and competencies to fulfil technical responsibilities.<br><br>c. The OMS Manual includes procedures to implement the policy for the MRF, including the TSF and Return Water Dam (RWD). The TFMS outlines minimum requirements for MRF management, water containment, and water diversion structures throughout the life cycle of the mine, from site selection and early studies through design, operation, and post-closure stages. The Waste Management Standard also details procedures for waste segregation and waste management, including identification, recycling and reuse, disposal, and monitoring.<br><br>d. Allocation of a significant budget to enable the effective implementation of the policy is evidenced by the GISTM/Tailings Budgets for the 2024 and 2025 periods, with sufficient allocation of resources to cover the requirements of the MRF for the period.<br><br>Interviews with managerial staff and workers, including contractors across the site, indicate that they understand their responsibilities and the policies related to solid and mine waste management.<br><br>The evidence, supported by interviews, indicates that the company's implementation of its waste management policies is supported by mechanisms outlined in sub-requirements (a) and (c), and partially in (b) and (d). |

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| | | | The evidence does not include sufficient detail to confirm that the implementation of the non-mineral Waste Management Standard is supported by:<br><br>b. A documented process (e.g., policy communication or training) that ensures employees understand the policy as relevant to their position and have sufficient competence to fulfil their responsibilities.<br><br>d. The allocation of a sufficient budget. |
| 4.1.2.1. | The operating company shall:<br><br>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<br><br>b. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. | ● | The evidence reviewed includes a set of inventories and procedures, which indicate that the company:<br><br>a. Maintains a list of chemicals identified in the different operation processes (e.g., concentrator, smelter, laboratory) as documented in a site-level Hazardous Chemical Register (Anglo American, last revised June 2023). Additional evidence reviewed includes a Non-Mineral Waste Inventory (Anglo American, February 2025) which includes a list of identified solid wastes including paper, rubber, metal, plastic, wood, hydrocarbon contaminated, biodegradable, biological (clinic waste), glass, Personal Protective Equipment (PPE), electronic waste, mineral waste (e.g., slimes, effluents, trash from processing screens, slag and waste rock) and other unclassified wastes.<br><br>b. Has developed procedures on the correct handling, storage, transportation and disposal of hazardous materials, outlining emergency services preparedness information and procedure for managing the hazardous waste landfill facility and the incinerator facility to prevent environmental impact as outlined in the Waste Management Standard (UNK-MIN-ENV-STD-0001, Valterra |

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| | | | Platinum, August 2025), a Hazardous Substances Material Standard (UNK-MIN-CON-STD-0300, Valterra Platinum, last revised September 2025), Handling and Disposal of Reagents Waste (UNK-MIN-CON-PRO-0317, last revised March 2021), Hydrocarbon Management Procedure (UNK-MIN-PRO-0003, last revised May, 2023), Hazardous Waste Landfill Operating Procedure (UNK-MIN-ENV-PRO-0004, last revised November, 2024), and Waste Incinerator Operating Procedure (UNK-MIN-ENV-PRO-0005, September, 2020). The Conceptual Design of the Hazardous Waste Disposal Facility (SRK, July 2007) indicates that the facility is designed to safely store wastes, including double lining and a leachate collection system.<br><br>On-site observations of the waste collection, storage, and handling facilities, as well as interviews with relevant staff, confirmed the implementation of the procedures. Material Safety Data Sheet (MSDS) registers were found at critical areas across the site. Interviews with workers indicate awareness of proper waste collection practices appropriate to their work area, as supported by observations of proper waste disposal across the site.<br><br>The evidence, supported by interviews and observations, indicates that the operating company has:<br><br>a. Identified all materials, substances, and wastes (other than mine wastes) associated with the mining project that have the potential to impact human health, safety, the environment, or communities.<br><br>b. Documented and implemented procedures for safe transport, handling, storage, and disposal of those materials, substances, and waste. |

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| 4.1.3.1. | The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities. | | The evidence reviewed includes a Workplace Risk Assessment and Control (WRAC) register (Anglo American, October 2022), which identifies the Tailings Storage Facility (TSF), Slag Dump, Return Water Dam (RWD), and Pollution Control Dam (PCD) as risk sources with potential health, safety, and environmental consequences. Regarding the TSF and the RWD, a Consequence Classification of Structures (CCS) Rating Update Report (Knight Piésold, April 2023) and a TSF Risk Assessment Report (iPresas, May 2025) support the identification of TSF-related failure modes, consequence classifications, and downstream impact zones. Facility locations are further confirmed through the Mineral Residue Facility (MRF) Locations Map, which includes the TSF, Slag Dump, PCD, and RWD.<br><br>The Implementation Plan for Phase 1 of Slag Repurposing (Anglo American, June 2023) identifies proposed slag deposition areas associated with rehabilitation activities.<br><br>On-site review of documentation and site observations confirm that the company has identified all existing and proposed mine waste facilities that could pose risks to human health, safety, the environment, or communities.<br><br>The evidence, supported by interviews, indicates that the company has systematically identified existing and proposed mine waste facilities with the potential to cause impacts on human health, safety, the environment, or the community. |
| 4.1.3.2. | The operating company shall perform a detailed characterization for each mine waste facility that has associated | | The evidence reviewed includes hydrogeological, geochemical, and water management documentation, including the Static Geochemical Test Results (Delta h, October 2018), TSF Hydrogeological Investigation (KP, July 2025), Water Balance |

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| | chemical risks. Characterization shall include:<br>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);<br>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:<br>i. Analysis of petrology, mineralogy, and mineralization;<br>ii. Identification of geochemical test units;<br>iii. Estimation of an appropriate number of samples for each geochemical test unit; and<br>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.<br>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes | | Update (KP, February 2025), and the Surface Flood Risk Management Plan (KP, June 2025). Additional evidence includes the Waste Classification of Slag (SRK, June 2018), Results for Leachates for Various Solid Wastes (University of Zimbabwe, December 2018), Surface Slag Safety Data Sheets (Anglo American and Valterra Platinum, May 2022; April 2025), the CCS and Design Criteria for Slag Stockpile (GLPS, January 2018), the Slag Stockpile Extension Basis of Design (KP, October 2022), and a Workplace Risk Assessment and Control (WRAC) for Slag Deposition at the Borrow Pits (Anglo American, January 2023).<br>These documents characterize the mine waste facilities with respect to chemical risks based on:<br>a. Facility description: The TSF Hydrogeological Investigation (KP, July 2025) and Surface Flood Risk Management Plan (KP, June 2025) describe site geology, hydrogeology, hydrology, and flood risk for the TSF. The CCS and Design Criteria for Slag Stockpile (GLPS, January 2018) and Slag Stockpile Extension Basis of Design (KP, October 2022) provide a high-level description of geological and climatic conditions applicable to the slag stockpile area.<br>b. Source material characterization: Geochemical testing of TSF tailings documented in the Static Geochemical Test Results (Delta h, October 2018) and the TSF Hydrogeological Investigation (KP, July 2025) includes analysis of three 93) composite tailings samples and four (4) tailings samples composited into two (2) representative samples. Testing methods include Acid-Base Accounting, mineralogical analysis (XRD), whole-rock geochemistry, and SPLP leachate testing to assess ARD and the potential for metal leaching. Results indicate that TSF tailings are non-acid-generating and |

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| | all sources, pathways and receptors for each facility;<br><br>d. Water balance and chemistry mass balance models for each facility; and<br><br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | | present a low metal-leaching risk, with mineralogy dominated by enstatite and talc, with limited carbonate buffering.<br><br>For smelter slag, mineralogical, chemical, and leachability testing indicate that the material is chemically inert with a low potential for ARD and metals leaching (Waste Classification of Slag, SRK, June 2018; Results for Leachates for Various Solid Wastes, University of Zimbabwe, December 2018; Surface Slag Safety Data Sheets, Anglo American and Valterra Platinum, May 2022; April 2025). Given the processed and largely homogeneous nature of slag, the intent of sub-requirements (b)(i)–(iv) is met through representative composite sampling and slag-appropriate characterization methods.<br><br>c. Conceptual model: The numerical groundwater flow model presented in the TSF Hydrogeological Investigation (KP, July 2025) describes contaminant sources, transport pathways, and receptors associated with the TSF.<br><br>d. Water and chemistry mass balance: The Water Balance Update (KP, February 2025) provides a detailed water balance for the TSF, Return Water Dam (RWD), and Pollution Control Dam (PCD). Supporting information on solute transport and plume behaviour is provided in the TSF Hydrogeological Investigation (KP, July 2025).<br><br>e. Contaminants of concern and receptors: The TSF Hydrogeological Investigation (KP, July 2025) identifies sulphate as the primary contaminant of concern, with potential receptors including downgradient shallow groundwater and the Mutevekwi River approximately 2.5 km west of the site. Slag leachate testing results (University of Zimbabwe, December 2018) are within acceptable limits for all analytes assessed. The Slag Stockpile Extension Basis of |

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| | | | Design (KP, October 2022) confirms that the slag stockpile is lined and equipped with a leachate collection system, and the WRAC for slag deposition (Anglo American, January 2023) evaluates risks associated with slag placement in borrow pits.<br><br>The evidence indicates the company has performed characterization of mine waste facilities with associated chemical risks fully aligned with sub-requirements (a), and (c) through (e), and substantially aligned with sub-requirements (b)(i) and (b)(iv) meeting the overall intent of the requirement.<br><br>Interviews with key staff indicate that climate change impacts on TSF design and performance have been considered.<br><br>The evidence does not include documentation to confirm climate change projections were considered in the design and performance of the TSF (a), and an identification of discrete geochemical test units or a rationale demonstrating that the number and compositing of tailings samples are sufficient and representative of potential geochemical variability across the TSF (b)(ii) and (b)(iii) to determine its ARD and ML potential. |
| 4.1.3.3. | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following: | ● | The evidence reviewed includes design reports, facility consequence classifications, technical reviews and inspection reports, and water management documentation indicating that the tailings storage facility (TSF) is the only mine waste facility with the potential for catastrophic failure that could impact human health, safety, the environment, or communities. Other mine waste facilities, including the slag stockpile, have been assessed and classified at lower consequence levels. |

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| | a. Detailed engineering reports, including site investigations, seepage and stability analyses;<br>b. Independent technical review (See criteria 4.1.6)<br>c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment;<br>d. Descriptions of facility design criteria;<br>e. Design report(s);<br>f. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns;<br>g. Master tailings placement plan (based on life of mine);<br>h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report;<br>i. Facility water balances (See also 4.1.3.2.d); and<br>j. Dam breach inundation (if applicable) and waste rock dump runout analyses. | | The identification and evaluation of physical risks associated with mine waste facilities are informed by the following:<br>a. and e. Detailed engineering reports and design reports: Multiple engineering studies, including the TSF Design Basis Report (KP, May 2025), Phase 7 Detailed Design Report (KP, February 2025), TSF Wall Raise and Return water Dam (RWD) Design (KP, August 2021), and TSF Closure Pre-Feasibility Study and Closure Design Criteria (KP, September 2024), document site investigations and seepage and stability analyses. For the slag stockpile, the Consequence Classification of Structures (CCS), the Design Criteria for Slag Stockpile (GLPS, January 2018), and the Slag Stockpile Extension Design Basis (KP, October 2022) were reviewed.<br>b. independent technical review: Independent oversight is documented by the Mineral Residue Management Technical Review Panel (TRP) Reports (2023 and 2024) and the TSF Dam Safety Review (Klohn Crippen Berger, May 2024).<br>c. Facility classification: TSF Consequence Classification of Structures (CCS) Reports (KP, 2021–2023) classify the TSF as “very high” consequence in accordance with GISTM. The slag stockpile is classified as “minor” (2018) and “moderate” (2022), indicating a lower risk profile.<br>d. and f. Design criteria, design reports, and short- and long-term placement plans: The TSF Design Basis Report (KP, May 2025), Phase 7 Detailed Design Report (KP, February 2025), TSF Wall Raise and RWD Design (KP, August 2021), and Smelter Pollution Control Dam Design Report (Ilifa Africa Engineers, September 2020), TSF Master Deposition Plan (KP, May 2025) and Quarterly TSF Reports (KP, 2023–2025) collectively define facility design criteria, |

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| | | | structural/geotechnical standards, operational parameters, short- and long-term deposition strategies, embankment construction schedules, and water management.<br><br>g. Master tailings placement plan (life of mine): The TSF Master Deposition Plan (KP, 2025) provides a life-of-mine tailings placement strategy integrating geotechnical, hydraulic, and environmental considerations.<br><br>h. Internal and external inspections and audits: The Annual Dam Safety Reports (KP, 2022–2024), TSF Quarterly Reports (KP, 2023–2025), and TRP Reports (2023 and 2024) document routine internal inspections and independent external audits.<br><br>i. Water balances: The TSF Water Balance Update 2024 (KP, February 2025) covers the period from 2025 to 2043. An operation-wide schematic overview of the water balance is contained in the TSF Complex Operating, Maintenance and Surveillance Manual (KP, April 2025).<br><br>j. Dam breach inundation and runout analyses: The TSF Breach Analysis (KP, April 2023) models potential failure scenarios and downstream inundation zones, including the identification of households with potential loss of life (PLL). The Slag Stockpile Extension Design Basis (KP, October 2022) includes runout assessments indicating that a slag stockpile failure would not result in catastrophic consequences such as loss of life or long-term environmental contamination.<br><br>Interviews with key staff confirm that the company has undertaken evaluations and inspections to identify physical (e.g., safety and stability) risks associated with its waste facilities, where the potential exists for catastrophic failure resulting in loss of human life or |

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| | | | environmental damage, including the identification of households with potential loss of life in the event of a TSF failure.<br>The evidence indicates that the company has identified and evaluated potential physical risks associated with mine waste facilities where the potential exists for catastrophic failure, in accordance with sub-requirements (a) through (j). |
| 4.1.3.4. | Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle. | ● | The evidence reviewed includes TSF Quarterly Reports (KP, 2023–2025), which document monitoring results, operational changes, and evolving physical conditions, and Annual Dam Safety Reports (KP, 2022–2024), which recommend updates to facility characterization parameters, including stability analyses, based on monitoring and field data. Updates to the TSF's risk profile are further evidenced by TSF Consequence Classification of Structures (CCS) Rating Reports (KP, December 2021; June 2021; May 2022; April 2023) and independent TSF Dam Safety Reviews conducted by Klohn Crippen Berger (March 2023; May 2024), which reassess consequence classification using updated inputs such as revised inundation mapping. The TSF Operating, Maintenance and Surveillance (OMS) Manual (KP, September 2022; April 2025) has been updated to reflect new operational information and design modifications under Phase 7.<br>Regarding the slag dump, the evidence includes a Change Management Request Form for slag deposition to borrow pits (Anglo American, August 2023) and a WRAC for slag deposition at borrow pits (Anglo American, January 2023). Classification of the slag pile has evolved over time, from "minor" in the CCS and Design Criteria for Slag Stockpile (GLPS, January 2018) to "moderate" in the Slag Stockpile Extension Design Basis (KP, October 2022), indicating |

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| | | | reassessment in response to changes in facility configuration and risk profile.<br><br>Waste material characterizations are supported by static geochemical and hydrogeological studies for tailings (Static Geochemical Test Results, Delta h, October 2018; TSF Hydrogeological Investigation, KP, July 2025) and by multiple material characterization reports for slag (Waste Classification of Slag, SRK, June 2018; Results for Leachates for Various Solid Wastes, University of Zimbabwe, December 2018; Surface Slag Safety Data Sheets, Anglo American and Valterra Platinum, May 2022; April 2025).<br><br>Interviews with relevant staff indicate that slag repurposing to borrow pits is being implemented as a regulator-approved, controlled Phase 1 trial, with updated characterization and approvals developed to evaluate performance before informing any permanent updates to slag management or reclamation plans. A conclusion on whether slag deposition in borrow pits will continue beyond the trial phase is outstanding.<br><br>The evidence indicates that the company maintains a systematic approach to periodically updating and assessing the TSF's risk profile and operational status and has updated the OMS accordingly. Slag pile facility characterization updates are undertaken on a change-triggered basis rather than through routine periodic reassessment, consistent with the facility's low-risk profile. |
| 4.1.3.5. | Use of predictive tools and models for mine waste facility characterization | ● | The evidence reviewed includes a TSF Hydrogeological Investigation (KP, July 2025), TSF Main Wall Buttress Extension |

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| | shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected. | | Letter (KP, October 2025), Unki Debottlenecking Project Plant Mass and Water Balance (Anglo American, June 2019), and the Water Balance Update 2024 (KP, February 2025).<br><br>The TSF Hydrogeological Investigation (KP, July 2025) presents a conceptual and numerical groundwater flow model that characterizes contaminant sources, transport pathways, and potential receptors associated with the TSF. The model includes solute transport and plume behaviour simulations developed using Leapfrog Works, an industry-recognized modelling platform, and reflects the incorporation of updated hydrogeological data.<br><br>The Water Balance Update 2024 (KP, February 2025) describes a forecast simulation model covering the period 2025–2043. The model is used to determine plant make-up water requirements, assess interactions between the Pollution Control Dam and the Return Water Dam (RWD), evaluate the potential for spillages from the RWD, and confirm compliance with flood routing and freeboard regulatory requirements. The model was developed using GoldSim, which is considered industry-standard software for dynamic water balance modelling. The previous Mine Water Management (Water Solutions, 2022) indicated a forecast of the expected tailings and free water inventory in the TSF based on the planned production and TSF raising over a 10-year period from 2022.<br><br>The TSF Main Wall Buttress Extension Letter (KP, October 2025) includes stability analyses for planned TSF wall raises, with recommendations to improve the factor of safety based on updated design assumptions and geotechnical data. In addition, the Unki Debottlenecking Project Plant Mass and Water Balance (Anglo American, June 2019) models the concentrator throughput and |

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| | | | associated water balances to support the debottlenecking expansion project.<br><br>Interviews with key technical and environmental personnel confirmed that predictive tools, including numerical groundwater flow models and site water balance models, are actively used to inform TSF design, operational planning, and risk management. Interviewees indicated that these models are updated when significant design changes occur (e.g., wall raises and buttressing) and when new hydrogeological, monitoring, or operational data become available, consistent with ongoing site characterization.<br><br>The evidence, supported by interviews, indicates that predictive tools and models for mine waste facility characterization are applied in a manner consistent with current industry best practice and are revised and updated as new site characterization and monitoring data become available over the life of the mine. |
| 4.1.4.1. | Critical. A risk-based approach to mine waste assessment and management shall be implemented that includes:<br><br>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;<br><br>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, | ◔ | The mine operates several mine waste facilities, including a Tailings Storage Facility (TSF) with an associated return-water dam (RWD), a slag pile with an associated seepage pond, and a pollution control dam (PCD) that manages site-wide stormwater.<br><br>The evidence reviewed describes the company's approach to mine waste facility assessment and management, which includes:<br><br>a. Identification of potential chemical and physical risks: Chemical and physical risks associated with the TSF, RWD, slag pile, and PCD were identified (see 4.1.3.2 and 4.1.3.3). TSF-related risks were captured during its planning phase in the initial Environmental Impact Assessment (EIA) (Scott Wilson, 2003). During the planning and commissioning of the smelter, the company assessed the |

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| | environment and communities early in the life cycle;<br><br>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<br><br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | | chemical risks of the slag material (Leachates for various Solid wastes, University of Zimbabwe, December 2018) and the physical risks associated with slag storage (CCS and Design Criteria for Slag Stockpile, GLPS, January 2018). Since approximately 2023, the slag pile has not been in use, and risks associated with the revised slag management approach (deposition in borrow pits commencing mid-2023) have been assessed through a Workplace Risk Assessment and Control (WRAC) process for Slag Deposition at Borrow Pits (Anglo American, January 2023).<br><br>b. Risk assessment of potential impacts on health, safety, environment, and communities: Potential impacts of mine waste facilities on community health and safety, including off-site and downstream receptors, are documented in the Community Health, Wellbeing and Safety Impact Assessment (BioSwitch Africa, 2024). Environmental risks associated with mine waste facilities were assessed through early waste characterization and evaluation of potential contaminant pathways, including geochemical testing of waste materials and hydrogeological investigations of the TSF (see 4.1.3.2).<br><br>c. Updating of risk assessments: The Mineral Residue Management Technical Review Panel (TRP) Reports (August 2023 and August 2024), and TRP Feedback Comments (Anglo American, November 2024) cover all mine waste facilities (TSF, RWD, PCD, and slag pile) and review facility performance as well as emerging risks. For regular TSF risk evaluations, evidence includes TSF Quarterly Reports (KP, 2023 Q1–2025 Q3) and Annual Dam Safety Reports (KP, 2022–2024). Additionally, third-party studies have been conducted for the TSF, including the Hydrogeological Investigation (KP, July 2025), the Tailings Breach Analysis (KP, April 2023), and the Semi- |

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| | | | Quantitative Risk Assessment (SQRA) Risk Assessment Report (iPresas, May 2025). Classification of the slag pile has evolved over time, from “minor” in the CCS and Design Criteria for Slag Stockpile (GLPS, January 2018) to “moderate” in the Slag Stockpile Extension Design Basis (KP, October 2022). More recent slag characterizations were conducted to confirm the slag's continued inertness (Surface Slag Safety Data Sheets, Anglo American and Valterra Platinum, May 2022; April 2025). The slag pile has not been in use since late 2023 and is subject to less frequent review consistent with its risk profile.<br><br>d. Documented risk assessment reports: The company documents its risk assessment in its general risk register (WRAC, Anglo American, August 2022), which consolidates risks identified in previous assessments, and a more recent risk register for the transition from slag stockpiling to deposition in borrow pits (WRAC for Slag Deposition at Borrow Pits, Anglo American, January 2023).<br><br>Interviews with staff responsible for the management of the site's mine waste facilities indicate the company has carried out a risk assessment for each facility that documents the potential chemical and physical risks and potential impacts on health, safety, environment, and communities; that this has been done early in the life cycle and has been updated over the course of the facility’s life.<br><br>The evidence, supported by interviews, indicates that the company has implemented a risk-based approach to mine waste assessment and management that systematically identifies and evaluates chemical and physical risks and associated impacts on health, safety, environment, and communities, in alignment with sub- |

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| | | | requirements (a) through (c), and partially aligned with sub-requirement (d).<br>The evidence does not include details or documentation to confirm the company systematically incorporates findings from the most recent risk assessments (e.g., SQRA Risk Assessment conducted in May 2025) into its risk register (d). |
| 4.1.4.2. | The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:<br>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;<br>b. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives;<br>c. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications;<br>d. Assess remaining alternatives using a rigorous, transparent decision-making | ◐ | The evidence reviewed includes the TSF Wall Raise Design and Water Management Optimisation RWD Site Selection Report (KP, June 2019) and the Unki Mine TSF 2: Recommendation for Site Location Letter (KP, September 2025). These documents indicate that the company's process for alternative assessments considered:<br>a. Minimum specifications: The RWD Site Selection Report (KP, June 2019) defines technical and performance criteria for the facility, including wall elevation, target storage capacities, HDPE lining to prevent groundwater interaction, stormwater diversion requirements, and geotechnical stability conditions. These criteria establish clear performance objectives for long-term stability and functionality of the RWD throughout the mine life cycle.<br>b. Possible alternatives: The RWD Site Selection Report identifies three 93) potential sites (Sites A, B, and C) for the RWD, while the TSF 2 Recommendation for Site Location Letter (KP, September 2025) compares multiple siting options within the northern lease boundary (Sites 1D, 3C, 4B) against physical, technical, cost, and logistical factors before selecting the preferred site.<br>d. Remaining alternatives: Both reports integrate environmental constraints (catchment management, stormwater control, liner design), technical parameters (wall height, storage capacity, |

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| | 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;<br><br>e. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and<br><br>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). | | drainage), and economic factors (earthworks and lining costs, power requirements).<br><br>e. Sensitivity analysis: The RWD Site Selection Report (KP, June 2019) models variations in wall elevations (1,211 m vs 1,212 m) and storage volumes (200,000 $m^3$ vs 400,000 $m^3$), testing how key parameter changes could influence site ranking to reduce potential bias in site selection.<br><br>f. Reassessment over time: The TSF 2 Recommendation for Site Location Letter (KP, 2025) documents that the alternatives assessment was repeated due to the encroachment of underground mining into the influence area of the existing TSF, necessitating identification of a new TSF site. Multiple alternatives (Sites 1D, 3C, and 4B) were evaluated against technical, environmental, and logistical factors.<br><br>Regarding slag management, evidence includes the Slag Stockpile Extension Design Basis (KP, October 2022), a Change of Management Report (Anglo American, August 2023)), a Slag Repurposing Implementation Plan Phase 1 (Anglo American, June 2023) sent to EMA, and a WRAC Register (January 2023). These documents show that the company revised its strategy from above-ground stockpiling to borrow pit disposal. Minimum specifications, performance objectives, and closure and post-closure objectives were considered qualitatively (a), two (2) alternatives were assessed with some risk screening (b and c), and the assessment was updated when the strategy changed (f). Environmental and geotechnical risks were factored into decision-making (d and e).<br><br>The evidence indicates that the company has carried out partial alternative assessments for a potential TSF expansion or new TSF, |

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| | | | the RWD, and slag disposal sites, which are partially aligned with sub-requirements (a) through (f).<br>The evidence does not include documentation confirming that the company systematically:<br>a. documented minimum specifications for the TSF;<br>b. considered a comprehensive set of alternatives for slag disposal;<br>c. carried out and documented a formal fatal flaw screening showing how alternatives failing minimum specifications are systematically eliminated;<br>d. assessed remaining alternatives using a formal, transparent multi-criteria decision-making tool such as Multiple Accounts Analysis (MAA) or an equivalent methodology;<br>e. conducted a sensitivity analysis for the TSF and slag disposal. |
| 4.1.5.1. | Critical. Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | ● | IRMA's notes on the requirement reference international guidelines from ANCOLD, the Canadian Dam Association, the European Commission, and the Mine Environment Neutral Drainage (MEND) program as benchmarks for Best Available Practices (BAP) and Best Available Techniques (BAT) for mine waste facility design and risk mitigation.<br>The evidence reviewed indicates that the company implements BAP and BAT, as follows:<br>TSF Design: The TSF Complex Phase 7 Detailed Design Report (KP, February 2025) describes the TSF as constructed on a low-permeability clay foundation and equipped with a subsurface toe drain to manage seepage, improve stability, and facilitate recovery |

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| | | | of seepage water. The design follows SANS 10286 standards and stability analyses benchmarked against corporate TSF design requirements. To further reduce operational risk, a return water dam was constructed following third-party recommendations to minimize ponding on the TSF (TSF Wall Raise Design and Water Management Optimisation Report and Return Water Dam Stage 1 Detailed Design, KP, August 2021).<br><br>TSF Operations: The Operations, Maintenance, and Surveillance (OMS) Manual (KP, April 2025) defines operational controls consistent with BAP and is periodically updated. Risk identification and mitigation are supported by dam-breach analyses, credible failure-mode assessments, and monitoring programs, including embankment movement monitoring (see 4.1.5.6). The GISTM Conformance Schedule (Anglo American, July 2025) indicates that actions required to align with GISTM, an internationally recognized BAP framework, are 93% complete.<br><br>Slag Storage Design: The CCS and Design Criteria for Slag Stockpile (GLPS, January 2018) confirms that the slag storage facility is lined with a geomembrane and equipped with a seepage collection system and pond. The facility has a maximum height of 10 m and was designed using generally accepted factors of safety. The Mineral Residue Management Technical Review Panel (TRP) Report (August 2024) indicates that the facility reached its design capacity in late 2023. Although an expansion was previously designed (Slag Stockpile Extension Design Basis, KP, October 2022), the company elected not to proceed and instead revised its slag management strategy.<br><br>Slag Storage Operations: The transition from slag deposition at the storage facility to disposal in borrow pits is documented through a |

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| | | | Change of Management Report (Anglo American, August 2023) and a Workplace Risk Assessment and Control (WRAC) Register (Anglo American, January 2023). These assessments evaluated environmental and geotechnical risks and determined that borrow pit deposition supports progressive rehabilitation by backfilling disturbed areas and reduces the visual and stability risks associated with above-ground slag piles. Regulatory approval was obtained prior to implementation, as evidenced by correspondence with the Environmental Management Agency (EMA) (RE: Request to Use slag pile Material for Rehabilitation of Borrow Pits, EMA, May 2023; Implementation Plan for Phase 1 of Slag Repurposing, Anglo American, June 2023). Mineral Residue Management Technical Review Panel (TRP) reports (August 2023 and August 2024) confirm that integrity reviews of the slag pile continue.<br><br>Return Water and Pollution Control Infrastructure: The Design Report for the Return Water Decant Pump System (KP, July 2024) demonstrates application of BAT/BAP through design features that support efficient return-water recovery and shallow-intake functionality. The Smelter Pollution Control Dam Expansion Design Report (Ilifa Africa Engineers, September 2020) documents the use of a composite liner system to limit infiltration and potential contaminant release, consistent with BAT/BAP for pollution control structures.<br><br>Onsite observations of the mine waste facilities, supported by interviews with relevant staff, indicate that the company actively reviews and refines its management practices, implementing changes consistent with BAT and BAP in response to issues and improvement opportunities identified through internal and external review processes. |

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| | | | The evidence, supported by observations and interviews, indicates that the company has designed and manages its mine waste facilities using BAP and BAT, informed by internationally recognized guidance and site-specific risk assessments. |
| 4.1.5.2. | Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:<br>a. Priority shall be given to source control measures to prevent generation of contaminants;<br>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<br>c. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes. | ● | The evidence reviewed includes the TSF Complex Operating, Maintenance and Surveillance (OMS) Manual (Knight Piésold Consulting, April 2025), the Tailings Facility Management System (rev. 2, July 2025), the Smelter Pollution Control Dam (PCD) Sediment and Return Water Pump Manual (Ilifa Africa Engineers, February 2024), and the Waste Management Standard (rev. 12.0, August 2025).<br>The evidence indicates that mitigation of chemical risks associated with mine waste facilities is implemented in accordance with the mitigation hierarchy:<br>a. Source control: Chemical risk mitigation prioritizes source control measures through facility design and operational controls. The TSF and Return Water Dam (RWD) are designed and operated with low-permeability liner systems to isolate tailings and process water from the surrounding environment. The TRP Report (2024) confirms that the slag pile is also lined with a geomembrane and equipped with a seepage collection system and pond, reducing the potential for contaminant generation and release.<br>b. Migration control: Where residual risk remains, migration is controlled through engineered containment and water management measures. These include cutoff drains and diversion ditches to minimize contact between clean stormwater and mine-affected areas, lined TSF cells, and controlled collection of return |

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| | | | water. Mine-affected water is routed through stormwater drains to the PCD, limiting lateral and vertical migration of contaminants.<br>c. Capture and treatment: Mine-impacted water (MIW) is captured and managed for reuse within the processing circuit, as documented in the PCD Operational Manual (Ilifa Africa Engineers, February 2024). Routine discharge to the receiving environment does not occur. During peak rainfall events, controlled releases from the RWD pass through an engineered artificial wetland designed to attenuate flows and improve water quality prior to discharge to surface waters.<br>On-site observations and interviews with relevant staff confirmed that these measures are in place.<br>The evidence indicates that the company applies source control as the primary risk mitigation measure (a), followed by migration control (b), and, where necessary, capture and treatment of mine-impacted water (c). |
| 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. | ● | The evidence reviewed includes TSF Monthly Monitoring Charts (Valterra Platinum, June–July 2025), a Tailings Facility Management System (rev. 2, Valterra Platinum, July 2025), and a TSF Risk Assessment Report (iPresas, May 2025). It also includes a Bowtie Breach of Tailings Dam analysis and the TSF Operating, Maintenance and Surveillance Manual (KP, April 2025). These documents describe a TSF management framework that integrates monitoring, preventive controls, and emergency preparedness for catastrophic failure scenarios and other unwanted events, consistent with generally accepted industry practices such as the Mining Association of Canada's Tailings Management Guide. |

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| | | | Operational manuals, risk assessments, and monthly monitoring charts demonstrate that critical controls are actively implemented, monitored, and corrective actions are taken as required. No catastrophic failure modes have been identified for the slag pile. As identified under requirement 4.1.3.3, no catastrophic failure modes have been identified for the slag stockpile, which is classified as a lower-consequence facility with no credible risk of loss of life or significant environmental impact.<br><br>Interviews with personnel responsible for TSF management indicate that Trigger Action Response Plans (TARPs) are a key component of the critical controls framework. TARPs define pre-established trigger levels linked to specific preventive and mitigative actions and are used to manage and escalate TSF risks in response to monitoring results.<br><br>The evidence, supported by interviews, indicates that the company has developed and implemented a critical controls framework for the high-consequence TSF that aligns with generally accepted industry frameworks. |
| 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. | ● | The evidence reviewed includes TSF Quarterly Review Reports (KP, 2023–2025) and Annual Dam Safety Reports (March 2023, June 2024, February 2025). Attendance registers annexed to these reports demonstrate interdisciplinary and interdepartmental participation in the review of TSF waste management strategies. These reviews are informed by site-specific data, including tailings deposition rates, water balance inputs, seepage monitoring, rainfall records, and geotechnical instrumentation. The reports document adaptive management actions, such as wall raises and risk-informed stability |

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| | | | monitoring, indicating that waste management strategies are responsive to modelled and monitored site conditions.<br><br>In addition, the Workplace Risk Assessment and Control (WRAC) register associated with the change in slag management from deposition at the slag storage facility to deposition in borrow pits (Anglo American, January 2023) reflects input from multiple site departments, demonstrating interdisciplinary consideration of slag management risks and controls.<br><br>Interviews with personnel responsible for mine waste management indicate that strategies are developed collaboratively, involving multiple departments.<br><br>The evidence, supported by interviews, indicates that mine waste management strategies for the TSF and changes to slag management have been developed and reviewed in an interdisciplinary and interdepartmental manner and are informed by site-specific characteristics, monitoring, and modelling. |
| 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:<br><br>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, | ◐ | The evidence reviewed includes the TSF Complex Operation, Maintenance and Surveillance Manual (TSF OMS Manual) (Knight Piésold, September 2022; April 2025 revision), the Mandatory Code of Practice (COP) for Mine Residue Facilities (SRK, 2018), the Smelter Pollution Control Dam (PCD) Sediment and Return Water Pump Manual (Ilifa Africa Engineers, February 2024), the Consequence Classification of Structures (CCS) and Design Criteria for the Slag Stockpile (GLPS, January 2018), and the Removal of Granulated Slag and Transportation to the Slag Dump Stockpile Procedure (Anglo American, March 2021), and a Slag Repurposing Implementation Plan Phase 1 (Anglo American, June 2023). |

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| | effluents, residues, and process waters, including recycling of process waters;<br><br>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;<br><br>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;<br><br>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and | | The documentation reviewed describes the company's operating manuals and associated procedures as follows:<br><br>a. Operations Plan: The TSF OMS Manual (Ch. 5–16) defines operational objectives and procedures for the transport and containment of tailings and associated water management at the TSF and its Return Water Dam (RWD), including recycling of process water. The Mandatory COP for Mine Residue Facilities provides additional detailed operational procedures for specific components of the TSF complex (e.g., cyclone operating procedures).<br><br>The Pollution Control Dam (PCD), which forms part of the site-wide mine-affected water management network (including ponded water from the TSF), is addressed in the PCD Manual, which outlines operational requirements for sediment management and return water pumping. The CCS and Design Criteria for the Slag Stockpile (GLPS, January 2018) establish performance expectations and describes water management controls for the slag dump. The Removal of Granulated Slag and Transportation to the Slag Dump Stockpile Procedure (Anglo American, March 2021) outlines the process for transporting slag from the smelter to the slag stockpile, and the Slag Repurposing Implementation Plan Phase 1 (Anglo American, June 2023) describes the transport and disposal of slag in borrow pits.<br><br>b. Maintenance Program: The TSF OMS Manual (Ch. 10) includes inspection requirements and routine, preventive, and event-driven maintenance activities for the TSF, RWD, and associated infrastructure (e.g., pumps, stormwater drains, fencing, and monitoring equipment). The PCD Manual indicates that a maintenance schedule has been developed for sediment removal |

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| | 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. | | and pump system management. The Slag Repurposing Implementation Plan indicates that rehabilitation is conducted progressively once borrow pits have been filled with slag and topped with topsoil to match the elevation of the surrounding terrain, with no instrumentation used.<br><br>c. Surveillance Program: The TSF OMS Manual (Ch. 11) establishes a surveillance program that includes routine inspections of physical integrity, infrastructure functionality, and monitoring equipment, event-driven inspections, review of actual versus expected performance, design conformance checks, and oversight of critical controls. Regarding slag, the Slag Repurposing Implementation Plan includes a monitoring plan for impacts to water and vegetation, as well as slag movement and pit rehabilitation progress.<br><br>d. Facility-Specific Performance Measures: The TSF OMS Manual (Ch. 11.12) provides guidance on non-conformance identification, and performance measures are further defined within the Trigger Action Response Plan (TARP) (Ch. 15), including qualitative and quantitative trigger levels linked to predefined response actions.<br><br>e. Risk Controls and Critical Controls: The TSF OMS Manual (Ch. 15) documents risk controls and critical controls through a structured TARP framework. This includes defined trigger levels, significant response actions, site-based operational responses, requirements for engineering evaluation, post-shutdown actions, and rate-of-rise response criteria. The Slag Repurposing Implementation Plan includes a brief description of emergency actions for impacts to groundwater. Priority unwanted events are identified in the |

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| | | | Baseline Risk Assessment and Control (WRAC) (Anglo American, January 2023) for the slag deposition at borrow pits.<br><br>Interviewees confirmed that surveillance activities include routine visual inspections (e.g., erosion, seepage, wildlife presence), inspections following significant rainfall or abnormal events, and periodic technical monitoring consistent with OMS requirements.<br><br>The evidence, supported by interviews, indicates that the company has developed an OMS Manual for the TSF complex that documents operations, maintenance, surveillance, facility-specific performance measures, and risk and critical controls in alignment with sub-requirements (a) through (e). Supporting procedures and design documents address operational controls for the Pollution Control Dam in partial alignment with sub-requirements (a) and for the slag stockpile and disposal in borrow pits meeting sub-requirements (a) through (c) and partially meeting sub-requirements (d) and (e).<br><br>The evidence does not confirm that maintenance programs, surveillance requirements, performance measures, and documented risk and critical controls for the Pollution Control Dam are fully aligned with sub-requirements (b) through (e) within a consolidated OMS framework. In addition, the plan for the disposal of slag deposition in borrow pits, does not define documented performance measures (d), and risk and critical controls for risks other than groundwater impacts, including priority unwanted events (e). |
| 4.1.5.6. | Critical. On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: | ● | The evidence reviewed includes an Engineer of Record (EoR) Appointment Letter for the TSF (KP, May 2025), Quarterly Reports (KP, 2023 Q1–2025 Q3), Annual Dam Safety Reports (KP, 2022–2024), |

| Req # | Requirement | Score | Basis for Rating |
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| | a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);<br>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);<br>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and<br>d. Inform the management review to facilitate continual improvement (see 4.1.5.8). | | a TSF Technical Review Panel (TRP) Geotechnical Investigation and Stability Review Letter (April 2024), Mineral Residue Management TRP Reports (KP, August 2023 and 2024) and a Summary of Dam Safety Review (KP, March 2023). The evidence indicates that the company evaluates the performance of its mine waste facilities to:<br>a. Assess whether the performance objectives are met: The TSF OMS Manual (KP, April 2025) outlines a multi-level inspection regime for the TSF and associated infrastructure, such as the Return Water Dam (RWD), seepage collection, and stormwater infrastructure. This regime includes daily, weekly, monthly, annual, and independent third-party inspections. Inspections assess the condition and performance of key components such as embankments, pipelines, decant structures, slopes, and return water systems, and verify operational parameters including slurry density, drain flows, piezometer readings, and freeboard levels. The slag pile, which has not been in use since 2023 and is classified as a lower-risk facility (see 4.1.3.3), is evaluated to a more limited extent, consistent with its risk profile. Performance expectations for the slag pile are defined in the CCS and Design Criteria for the Slag Stockpile (GLPS, January 2018) and the Removal of Granulated Slag and Transportation to the Slag Dump Stockpile Procedure (Anglo American, March 2021). Similarly, performance criteria for the Pollution Control Dam (PCD) are established in the Smelter Pollution Control Dam Sediment & Return Water Pump Manual (Ilifa Africa Engineers, February 2024). TSF Quarterly Reports (KP, Q1 2023–Q3 2025), Annual Dam Safety Reports (KP, 2022–2024), and TRP review letters and reports (TRP, August 2023; April 2024; August 2024) demonstrate that the company systematically evaluates whether performance objectives and design intent are being met for the TSF, RWD, PCD, slag pile, |

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| | | | which was decommissioned in late 2023, and to some extent the slag deposition in borrow pits. These evaluations identify deviations, performance trends, and corrective actions. These evaluations demonstrate that performance is regularly assessed against available operational parameters, design criteria, and OMS requirements. While gaps were identified under requirements 4.1.4.2 and 4.1.5.5 regarding the systematic definition and documentation of performance objectives and criteria across all facilities, the available evidence indicates that performance is nonetheless actively monitored and evaluated against existing operational expectations, though not fully comprehensive.<br><br>b. Assess the effectiveness of risk management measures: The TSF OMS Manual (KP, April 2025) documents a comprehensive risk assessment and management process, including identification and ranking of potential hazards, estimation of likelihood and consequence, implementation of control measures, and regular evaluation of the effectiveness of these measures to ensure that risks are adequately mitigated. In addition, the Mineral Residue Management TRP Reports (TRP, August 2023; April 2024; August 2024) provide regular and independent verification of risk management measures for the TSF, RWD, slag pile, and PCD, through review of previous recommendations, site inspections, and evaluation of operational and maintenance practices, confirming that critical controls are functioning effectively and identifying opportunities for improvement.<br><br>c. Inform updates to the risk management process and the OMS: The company maintains a risk register for its Mineral Residue Facilities (MRFs) (WRAC, Anglo American, August 2022), consolidating risks identified through various assessments. Updates |

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| | | | to the TSF OMS Manual in September 2022 and April 2025, consistent with the scheduled biennial review cycle, demonstrate that performance evaluations, inspection findings, and external review outcomes inform revisions to operational controls, monitoring requirements, and risk management processes. Independent specialist inputs, including updates to dam break analysis, consequence classification, and credible failure modes, further demonstrate that evaluation outcomes are used to strengthen risk management and OMS documentation over time.<br><br>d. Inform the management review to facilitate continual improvement: The evidence indicates that performance evaluations of the TSF and other mine waste facilities are reviewed through TRP review letters (KP, Aug 2023; Apr 2024; Aug 2024), annual dam safety reports (KP, 2022–2024), quarterly TSF reports (KP, Q1 2023–Q3 2025), and other inspection records, providing management with information on operational performance, risk status, and deviations from planned objectives. Findings from independent reviews, annual audits, and site inspections are incorporated into management discussions, informing corrective actions, procedural updates, and refinements to risk management controls.<br><br>The evidence indicates that the company regularly and systematically evaluates the performance of its mine waste facilities in a manner aligned with facility risk profiles and consequence classifications and consistent with sub-requirements (a) through (d). |
| 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 | ● | The evidence, TSF Operating, Maintenance and Surveillance (OMS) Manual (KP, September 2022; April 2025), has undergone updates to reflect new operational information and design modifications. The 2025 version includes revisions to monitoring frequencies, |

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| | 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. | | inspection responsibilities, and critical control measures related to return water and seepage management, following design changes under Phase 7 of the TSF complex and findings from KP inspections (2024–2025). These updates incorporate revised risk and critical control strategies to ensure continued protection of human health, safety, and the environment. The Smelter Pollution Control Dam Sediment & Return Water Pump Manual (Ilifa Africa Engineers, February 2024) and Removal of Granulated Slag and Transportation to the Slag Dump Stockpile Procedure (Anglo American, March 2021) describe the application of OMS principles to the PCD and slag pile and have not been updated to date. The most recent TSF Quarterly Report (KP, Q3 2025) and TRP Review Letter and Reports (KP, August 2024) indicate the PCD and slag pile perform as intended (note: the slag pile has not been in use since 2023).<br><br>Interviews with key personnel confirm that the company has processes in place to swiftly address identified issues by implementing new or revised risk mitigation measures.<br><br>The evidence, supported by interviews, indicates that the company periodically updates its OMS Manuals to reflect new operational information and implements revised risk and critical control strategies where necessary to ensure mine waste facilities are effectively operated and maintained. |
| 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 | ● | The evidence reviewed includes Annual Dam Safety Reports (KP, 2022, 2023, 2024), which document annual management reviews that are:<br><br>a. Aligned with the steps outlined in the Mining Association of Canada's Tailings Management Protocol, including annual |

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| | contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:<br><br>a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and<br><br>b. Be documented, and the results reported to an accountable executive officer. | | performance evaluation, independent technical review, documentation of findings, recommendations for improvement, and measures to prevent catastrophic failure.<br><br>b. Documented with results reported to an accountable executive officer, as confirmed by the distribution list included in the reports.<br><br>The evidence indicates that the company conducts and documents annual reviews to facilitate the continual improvement of its mine waste management practices in alignment with recognized tailings management best practices. |
| 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. | ● | The evidence reviewed includes a TSF Dam Safety Review (Klohn Crippen Berger, May 2024) and two (2) Mineral Residue Management Technical Review Panel (TRP) Reports (August 2023 and 2024), representing independent, periodic reviews of the TSF, site water management infrastructure (including the RWD and PCD), and the slag pile. These reviews provide findings and recommendations related to engineering design, construction, and maintenance practices, environmental and water management, risk management, and emergency preparedness and response, which inform the ongoing management of the facilities.<br><br>With respect to changes in slag management practices, the Environmental Management Agency (EMA) independently sampled and analysed slag material to verify its inertness prior to approving its use for rehabilitation of borrow pits (RE: Request to use Slag Dump Material for Rehabilitation of Borrow Pits, EMA, May 2023). EMA required a phased implementation approach, which the |

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| | | | company addressed through an implementation plan including trial deposition and quarterly monitoring of slag composition and leachate (Implementation Plan for the Phase 1 of Slag Repurposing, Anglo American, June 2023).<br><br>Interviews with relevant personnel confirm that independent reviews are undertaken prior to changes in mine waste management and that recommendations from these reviews have informed design modifications (e.g., re-design of the RWD spillway).<br><br>The evidence, supported by interviews, indicates that the siting, design, and ongoing management of the tailings storage facility (TSF), as well as modifications to mine waste management strategies, are informed by independent reviews throughout the mine life cycle. |
| 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 facilities, a panel of three or more subject matter experts shall comprise the independent review body. | ● | The evidence reviewed includes two (2) Mineral Residue Management TRP Reports (August 2023 and August 2024), which confirm that independent reviews are conducted by a Technical Review Panel comprising four (4) to five (5) independent engineers with relevant expertise. The scope of the reviews includes the TSF, RWD, slag dump, and PCD, and addresses conformity with internal standards and international good practice, potential environmental and operational risks, and storage capacity.<br><br>The evidence indicates that independent reviews of the high-consequence TSF are conducted by a panel of three (3) or more subject-matter experts, consistent with the requirements for high-risk mine waste facilities. |

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| 4.1.6.3. | Independent reviewers shall be objective, third-party, competent professionals. | ● | The evidence reviewed includes the Terms of Reference for the Independent Technical Review Panel (TRP) on Mineral Residue Facilities and Water Management Structures (Anglo American, March 2023), which incorporate Declaration of Independence statements signed by the four (4) individuals serving on the 2024 TRP, confirming their independence from the company and its operations. Additional evidence includes documentation of the TRP members' professional backgrounds in the Mineral Residue Management TRP Report (August 2024), which indicates that TRP members are competent to conduct technical reviews of the TSF and other mine waste facilities.<br><br>The evidence indicates that the company has engaged competent, independent, third-party professionals to conduct technical reviews of its mine waste facilities. |
| 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. | ● | The evidence reviewed includes the Terms of Reference for the Independent Technical Review Panel (TRP) on Mineral Residue Facilities and Water Management Structures (Anglo American, March 2023), which define the TRP's reporting arrangements. The Terms of Reference state that the TRP reports directly to the company's Accountable Executive and that its findings are presented to the General Manager, the operation's competent person, and other relevant management and operational personnel through close-out meetings.<br><br>Interviews with relevant personnel confirm that these reporting arrangements are implemented in practice. |

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| | | | The evidence indicates that the independent review body reports to both the operation's General Manager and the Accountable Executive. |
| 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. | | The evidence reviewed includes the Risk Mitigation Matrix for Unki Mineral Residue Facilities (April 2022), which tracks action items arising from independent technical review recommendations, including priority and risk ranking. Additional evidence includes the Mineral Residue Facilities Technical Review Panel (TRP) Review Summary Tracking Sheet (November 2024), which documents updated actions in response to recommendations from the 2023 and 2024 independent reviews. A GISTM Conformance Schedule (Valterra Platinum, July 2025) further tracks the implementation of actions intended to address gaps against the GISTM and selected issues raised by the TRP.<br><br>The evidence indicates that the operating company has developed and updated an action plan in response to commentary, advice, and recommendations from independent reviews, and has established mechanisms to track implementation progress, with no evidence that any recommendations were formally rejected. |
| 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. | | IRMA expects existing mines that did not engage stakeholders during waste facility screening, siting, and assessment to demonstrate compliance by informing a broad range of stakeholders about the current design and management of the facilities.<br><br>The evidence reviewed includes minutes from quarterly Community Engagement Forum (CEF) and Community |

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| | | | Environment Committee (CEC) meetings covering Q1 2023 to Q2 2025, which indicate that the company holds regular meetings with community representatives to discuss mine operations. These discussions include explanations of mine waste facility design and management practices, such as emergency preparedness (e.g., TSF design, TSF-related drills, and stakeholder mapping) and water discharges from the RWD during the rainy season. Correspondence with the Environmental Management Agency (EMA) (RE: Request to use Slag Dump Material for Rehabilitation of Borrow Pits, May 2023) indicates that the company consulted with the local agency prior to finalizing its plans for slag deposition in borrow pits.<br><br>The evidence indicates that the company has established mechanisms to regularly inform stakeholders about mine waste facility design and management, with a particular focus on the TSF, and to respond to stakeholder requests.<br><br>The evidence does not confirm that the company has consulted or informed community stakeholders about changes to slag disposal in borrow pits, which the community reportedly uses for grazing. |
| 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 | ● | The evidence reviewed includes the site's Emergency Response Plan (ERP) (v.6, Valterra Platinum, August 2025), a Community Emergency Preparedness and Response Plan (CEPRP) (v.6, Valterra Platinum, July 2025), Emergency Management Stakeholder Engagement presentations (Anglo American, October and June 2024), and meeting minutes of the Community Emergency Committee (CEC) (Q1 2023–Q2 2025).<br><br>Evidence of consultation and review with potentially affected communities, workers/workers' representatives, first responders, |

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| | government agencies. (See also IRMA Chapter 2.5) | | and relevant authorities is documented through consultations with government authorities and first responders on TSF-related emergency procedures (Capacity Assessment, ERP Review, and Recovery Plan Meeting Minutes, Anglo American, November 2024; Disaster Recovery Planning Meeting Minutes, Anglo American, February 2025), community engagement related to the CEPRP (samples of quarterly stakeholder meetings and feedback, 2021–2024; Masasa and Gutsaruzhinji EPRP meeting minutes, Anglo American, February 2025; TSF-related Individual Right-holder Engagement Report, Anglo American, August 2023), and ERP review sessions with workers' representatives, workers, and contractors (attendance registers, Valterra Platinum, December 2024–September 2025). Ongoing coordination with communities and authorities is further documented in quarterly CEC meeting minutes (Q1 2023–Q2 2025). An attendance register of the Emergency Preparedness and Response Stakeholder Workshop – TSF Failure Desktop Review (Anglo American, February 2024) records attendance of the local police and civil protection officers.<br><br>A TSF Dam Failure Drill Report (Anglo American, March 2025), supported by roll call registers and photos, indicates that workers, community stakeholders, and first responders, including the local fire and police teams and the District Civil Protection Unit, participate in emergency drill exercises simulating a TSF failure and that their feedback was gathered following the exercise. A summary of TSF Drill Feedback and Learnings (Valterra Platinum, June 2025) indicates that lessons learned are shared with relevant stakeholders during ERP meetings. Examples of feedback incorporated into the current CEPRP, based on stakeholder consultation and emergency drills, include adjustments to assembly points in Masasa village, |

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| | | | informed by community input during an April 2023 consultation on TSF wall failure response.<br><br>Interviews with managerial and safety staff confirm that community stakeholders, workers, first responders, and regulatory agencies were consulted during the development of the TSF emergency plan, and that feedback is collected after each emergency drill and incorporated into plan updates.<br><br>The evidence, supported by interviews, indicates that the company has developed Emergency Preparedness Plans for catastrophic TSF failure, communicated them to stakeholders, and incorporated feedback from communities, workers, first responders, and regulatory agencies. |
| 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) | ● | The evidence reviewed includes a Mock Drill Report (Anglo American, March 2025) involving members of the Gutsaruzhinji and Masasa communities to test response to a potential TSF failure. A previous TSF drill with the same communities was conducted in March 2022. A summary of TSF Drill Survey Outcomes (Anglo American, 2025) states that emergency field drills are scheduled every three (3) years.<br><br>Interviews with company personnel confirm that Gutsaruzhinji and Masasa are the only communities within the potential TSF inundation zone, and interviews with these two (2) communities confirm their participation in these emergency drills.<br><br>The evidence, supported by interviews, indicates that emergency and evacuation drills for potential catastrophic TSF failure are conducted regularly. |

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| 4.1.7.4. | If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies. | ● | The evidence reviewed includes the site's Safety, Health and Environment (SHE) Policy (Unki Mines, July 2025), which commits to making safety, health, and environmental information available to interested parties upon request. The evidence also includes minutes from quarterly Community Engagement Forum (CEF) and Community Environment Committee (CEC) meetings covering Q1 2023 to Q2 2025, which indicate that the company holds regular meetings with community representatives to discuss mine operations and respond to community inquiries, including topics related to mine waste management.<br><br>A review of the Grievance Registers (Unki Mine, 2023–2025) indicates that no information requests specific to mine waste management have been made.<br><br>Interviews with relevant staff indicate that information regarding mine waste facility management actions, monitoring and surveillance results, independent reviews, and the effectiveness of management strategies would be shared with stakeholders upon request.<br><br>The evidence, supported by interviews, indicates that the company would share information related to mine waste facilities with stakeholders upon request. |
| 4.1.8.1. | Critical. At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA. | ● | The evidence reviewed includes a set of Environmental and Social Impact Assessments (see 2.1.3.1) and documentation related to waste management reviewed in Chapter 4.1, which indicates that the company does not use riverine, submarine, or lake disposal of mine waste materials. |

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| | | | On-site observations confirm that the company does not use riverine, submarine, or lake disposal of mine waste materials. |

## Chapter 4.2—Water Management

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 84% |
| Chapter Score Basis | 32 out of 38 possible points |

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| 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. | ◐ | Water in the area is sourced primarily from groundwater (e.g., boreholes and bush pumps) and from surface water sources, including Lucilia Poort Dam and the Mutevekwana and Mutevekwi Rivers, which support domestic and agricultural uses (irrigation and livestock). Water for mine operations is sourced from Lucilia Poort Dam (under a licence issued by the Zimbabwe National Water Authority [ZINWA]), two (2) groundwater well fields, and recycled water from the Tailings Storage Facility (TSF) and associated facilities.<br><br>The evidence reviewed includes the site's initial Environmental and Social Impact Assessment (ESIA) (Scott Wilson, September 2003), the Water Management Plan (Anglo American, October 2021), the Water Augmentation Project EIA (Black Crystal Consulting, August 2020), the Feasibility Report on Bulk Water Demand and Water Resources Assessment for Shurugwi (Bill Melly and Associates, May |

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| | | | 2025), and the TSF Hydrogeological Investigation (KP, July 2025). These documents collectively provide baseline and updated information on water sources and associated users.<br><br>The initial ESIA and the Water Management Plan include baseline information on water sources and users. The Water Augmentation Project EIA includes mapping of community boreholes and identifies community stakeholders potentially affected by groundwater abstraction associated with the development of well fields. The Groundwater Augmentation Project meeting minutes (June 2020) document engagement between the site and representatives of Pasimupindu Village to discuss water availability and community water needs. The TSF Hydrogeological Investigation includes a hydrocensus that identifies neighbouring groundwater users, confirms groundwater as the primary drinking water source for surrounding villages, and maps boreholes and pumps with their general use (domestic and drinking water). The Feasibility Report assesses current and future water supply and demand for the town of Shurugwi in relation to population growth and the site's water demand and identifies available water resources.<br><br>Interviews with key site personnel confirm that both surface water and groundwater users have been identified, including surrounding communities and local authorities, and indicate ongoing engagement with stakeholders such as the Shurugwi Town Council in the scoping of water users. Interviews also indicate that a portion of the Lucilia Poort Dam storage is reserved for community water use. |

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| | | | The evidence indicates that the company has taken steps to identify populations of water users that may be affected by, or affect, its mine water management practices.<br><br>The evidence does not provide details or documentation confirming the types and numbers of users associated with each water source, nor does it provide a consolidated register of water users and water rights holders who may be affected by mine water management practices. |
| 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. | ● | The evidence reviewed includes a set of ESIAs for the Impali Source Housing Project (Black crystal Consulting, July 2008), the Lucilia Port 11 KV – Pumpstation (Nkola Investments, no date), the Smelter (Ascon Africa, March 2016), the Pollution Control Dam (PCD) Expansion Project (Black Crystal Consulting, May 2020), the Waste Incinerator (Black Crystal Consulting, August 2020), and the Water Augmentation Project (Black Crystal Consulting, August 2020), which indicate that the company has gathered general baseline information on water resources and on water use, as well as assessed the site's potential impacts on surface and groundwater resources.<br><br>Meeting minutes with communities regarding the Water Augmentation Project (Black Crystal Consulting, August 2020) and the Location of Future users (Anglo American, October 2019) include community concerns about water availability, indicating stakeholder consultation on water-use-related issues. Meetings have been held with the competent authority (ZINWA) to identify future water users (Anglo American, October 2019), including current and potential future water users. |

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| | | | Additional evidence includes a Regional Water Resources Assessment (Anglo American, July 2021), Biomonitoring Assessment of the Aquatic Resources in the Vicinity of Unki Mines (Scientific Aquatic Services, June 2025), the TSF Hydrogeological Investigation (KP, July 2025), and the Bulk Water Demand and Water Resources Assessment for Shurugwi, Zimbabwe (Bill Melly and Associates, May 2025) which describe the company's efforts to conduct research relating to water-dependent natural resources (i.e. aquatic ecosystems and organisms, wetlands, etc.) and ecosystem services that could be affected if there are mining-induced changes to water quality or quantity.<br><br>The evidence indicates that the company has conducted its own research and collaborated with stakeholders to identify current and potential future water uses at the local and regional levels that may be affected by the mine. |
| 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. | ● | The evidence reviewed includes the Bulk Water Demand and Water Resources Assessment for Shurugwi, Zimbabwe (Bill Melly and Associates, May 2025), which identifies local water users in the nearby town of Shurugwi and notes that the company collaborates with the town council to address current and future water demand issues. Additional evidence includes the Q1 Community Emergency Committee (CEC) Meeting Minutes (Anglo American, March 2023) and the Q3 CEC Meeting Minutes (Anglo American, September 2023), which document discussions between the company and community around several topics, among them water access and security issues, as well as emergency preparedness. The evidence indicates the company collaborates with relevant stakeholders, including authorities and water users, to identify and address |

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| | | | shared water challenges, including access to clean water (e.g., by supporting the drilling of boreholes).<br>Interviews with key staff and community stakeholders confirm that the company has drilled boreholes in potentially affected communities to improve access to drinking water and has equipped the water pipeline from the Lucilia Poort Dam to the mine site with valves that nearby communities can use to abstract water for personal use. Interviews with key personnel indicate that most mine-related impacts on water quality are expected to be negligible, as the mine does not discharge any mine-affected water to nearby waterbodies, except for infrequent discharges from the Return Water Dam during the rainy season.<br>The evidence, supported by interviews, indicates that the company has conducted its own research and collaborated with stakeholders to identify and address shared water challenges and opportunities at the local and regional levels, and has taken steps to contribute positively to local and regional water stewardship outcomes. |
| 4.2.2.1. | The operating company shall gather baseline or background data to reliably determine:<br>a. The seasonal and temporal variability in:<br>i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwaters that may be affected by the mining project; | ● | The evidence reviewed includes the Initial ESIA (Scott Wilson, September 2003), Groundwater Monitoring Network Installation (SRK Consulting, November 2010), Biodiversity Baseline & Ecosystem Services Assessment Report (University of Zimbabwe, September 2020), Numerical Groundwater Flow Model (Water Hunters, July 2020), TSF Hydrogeological Investigation and TSF Water Balance Update (Knight Piésold, February and July 2025), Static and Kinetic Geochemical Test Results and Hydrological Report – Groundwater Model (Delta H, April–October 2018), and |

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| | ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwaters) that may be affected by the mining project; and<br><br>b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project. | | Biomonitoring Assessment of Aquatic Resources in the Vicinity of Unki Mine (Scientific Aquatic Services, June 2025).<br><br>The evidence indicates that the company has gathered baseline and background data to:<br><br>a.i. Reliably determine seasonal and temporal variability in the physical, chemical, and biological conditions of surface water and groundwater that may be affected by the mining project. Specifically, the Initial ESIA (Scott Wilson, September 2003), ESIA for Water Augmentation Project (Black Crystal, August 2020), Biodiversity Baseline & Ecosystem Services Assessment Report (University of Zimbabwe, September 2020), Static and Kinetic Geochemical Test Results (Delta H, 2018), and Biomonitoring Assessment (Scientific Aquatic Services, June 2025) include baseline characterization of groundwater and surface water quality up- and downstream of the site including physico-chemical parameters and potential contaminants of concern such as mercury, arsenic, and cyanide and aquatic biological conditions.<br><br>a.ii. Reliably determine water quantity, including flows and groundwater levels, that may be affected by the mining project. Specifically, the Initial ESIA (Scott Wilson, September 2003), Groundwater Monitoring Network Installation (SRK Consulting, November 2010), Numerical Groundwater Flow Model (Water Hunters, July 2020), Hydrological Report – Groundwater Model (Delta H, October 2018), and TSF Hydrogeological Investigation and TSF Water Balance Update (Knight Piésold, 2025) include groundwater monitoring, groundwater modelling, and water balance information. |

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| | | | b. Identify sources of contamination and changes in water quantity or quality unrelated to the mining project. Specifically, the Initial ESIA (Scott Wilson, September 2003), Biodiversity Baseline & Ecosystem Services Assessment Report (University of Zimbabwe, September 2020), and regional hydrogeological and geochemical investigations (Delta H, 2018; Knight Piésold, 2025) identify natural geological influences and other non-site-related factors such as artisanal mining - affecting water quality.<br><br>The evidence indicates that the company's water characterization fully aligns with sub-requirements (a.ii.) through (b). |
| 4.2.2.2. | The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:<br><br>a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and<br><br>b. The mine's use of water, and any mining activities that may affect water quantity. | ● | The evidence reviewed includes the Initial ESIA (Scott Wilson, September 2003), the ESIA for Water Augmentation Project (Black Crystal Consulting, August 2020) and the Solar PV Project (SLR, June 2023), the TSF Hydrogeological Investigation (KP, July 2025), Q3 CEF Meeting Minutes (Anglo American, September 2024), Bulk Water Demand and Water Resources Assessment for Shurugwi: Conceptual report (Bill and Melly associates, July 2024), and the Bulk Water Demand and Water Resources Assessment for Shurugwi: Feasibility report (Bill and Melly associates, May 2025). The evidence indicates that the company's scoping efforts considered:<br><br>a. The mining-related chemicals, wastes, facilities, and activities that may pose a risk to water quality. The evidence indicates that scoping was conducted in collaboration with relevant stakeholders as part of the ESIA process (i.e., consultation meetings or focus groups at the district and community levels), which included the identification of potential risks, mitigation measures, and the ESIA prepared by the Environmental Management Agency (EMA). |

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| | | | Impacts on water quality and quantity (diminishing water resources, scarcity, water conflicts), including those from water use, were assessed, as along with mitigation measures. Meeting Minutes indicate continued discussions with communities regarding monitoring of water quality and maintaining the quality (CEF minutes, Anglo American, September 2024).<br><br>b. The mine's use of water, and any mining activities that may affect water quantity: Water uses by the mine have been predicted, with monthly uses documented. The company has predicted demand and supply for Shurugwi Town Council, including quantities required as per population growth (Bill and Melly Associates, May 2025). These assessments identify potential pressures on shared water resources and inform planning for water allocation and supply.<br><br>Interviews with a sample of key staff, including managers, community members, and government, indicate that the company makes efforts to disseminate information on water quality and quantity issues, including prior to the implementation of the ESIA process, as well as during the course of a project through CEF meetings, engagement with the competent authority (ZINWA), etc. Interviews indicate that the company has also constructed boreholes for communities to reduce water scarcity and impacts on water availability.<br><br>The evidence, supported by interviews, indicates that the company has carried out a process that included collaboration with relevant stakeholders to identify potentially significant impacts that the mining project may have on water quantity and quality, as well as current and potential future water uses. |

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| 4.2.2.3. | Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:<br><br>a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources;<br><br>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);<br><br>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<br><br>d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. | ◐ | The evidence reviewed includes the TSF Hydrogeological Investigation (KP, July 2025), TSF Water Balance Update 2024 (KP, February 2025), TSF Closure Pre-feasibility Design (KP, June 2025), and the Surface Flood Risk Management Plan report (KP, June 2025). The evidence indicates that the company has considered and conducted the following evaluations to predict and quantify potential significant impacts:<br><br>a. A conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources: The hydrogeological conceptual model (KP, July 2025), informed by site characteristics (including geology, hydrogeology, structural features, and site layout), indicates that there are no identified social receptors in the vicinity of the mine, as no neighbouring groundwater users are likely to be affected by mining operations. Site surveys west of the TSF wall identified potential seepage within the shallow aquifer, associated with a drainage system discharging towards the Mutevekwi River. This informed the installation of additional groundwater monitoring boreholes to support ongoing assessment and management.<br><br>b. A numeric groundwater flow model to predict impacts that might occur under different groundwater conditions: Numerical groundwater flow model (KP, July 2025) and contaminant transport modelling were undertaken to predict potential impacts under operational and post-mining conditions. The model indicates that the solute plume remains largely contained within the TSF footprint, with limited westward migration over time, and predicts that sulphate concentrations will not reach the Mutevekwi River system under current or future groundwater conditions. |

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| | | | d. A predictive model or analysis of whether water treatment will be required during operations and mine closure/post-closure: The TSF Closure Pre-feasibility Design (KP, June 2025) provides a plan and analysis of closure provisions, including those related to water quality. Plume migration over the remaining 15-year life of mine and a 50-year post-mining period was simulated using calibrated hydrogeological parameters, rainfall-based recharge, and monthly time steps. These scenarios enabled prediction of contaminant behaviour during operations and long-term post-closure conditions (KP, July 2025).<br><br>The evidence indicates that the company has developed models to better understand potential mine-related impacts on water in full alignment with sub-requirements (a) and (d), and in partial alignment with sub-requirement (b).<br><br>The evidence does not include details or documentation to confirm that over time, site water balance models are calibrated, evaluated, and revised or updated (b), and whether other numerical models have been developed for potential impacts to surface water or groundwater resources (c). |
| 4.2.2.4. | Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected. | ● | The evidence reviewed includes the TSF Hydrogeological Investigation and TSF Water Balance Update 2024 (Knight Piésold, February and July 2025), Surface Flood Risk Management Plan Report (Knight Piésold, June 2025), and Water Balance Update and Water Management Scenario Analysis (Water Solutions, February 2022). The TSF Hydrogeological Investigation (Knight Piésold, July 2025), Surface Flood Risk Management Plan Report (Knight Piésold, June 2025), and Water Balance Update and Water Management Scenario Analysis (Water Solutions, February 2022) include |

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| | | | hydrogeological investigations, water balance modelling, and flood risk modelling used to predict groundwater flow, water balance, and surface water runoff. These studies were completed by qualified external consultants and include documented modelling methods using a wide array of internationally and industry-wide recognized software (e.g., GoldSim) and methods (USSCS method for rainfall runoff modelling), assumptions, and outputs. The Water Balance Update and Water Management Scenario Analysis (Water Solutions, February 2022) and the TSF Water Balance Update 2024 (Knight Piésold, February 2025) demonstrate periodic updates to the water balance model, incorporating new operational and monitoring data. Model inputs include site monitoring results and operational parameters, indicating that models are revised as new data become available.<br><br>Interviews with key staff confirmed that the tools and models are aligned with current industry best practices.<br><br>The evidence, supported by interviews, indicates that predictive tools and models are revised and updated over the life of the mine as operational monitoring and other relevant data are collected.<br><br>The evidence indicates that predictive tools and models are consistent with current industry best practices and are revised and updated over the life of the mine as relevant operational data are collected. |
| 4.2.3.1. | The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse | ● | The evidence reviewed includes the Bulk Water Demand and Water Resources Assessment for Shurugwi: Feasibility report (Bill and Melly Associates, May 2025), CEF presentations ( 2024 Q1- Q3 and 2023 Q2 and Q4), Emergency management - Environmental |

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| | 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. | | Management Plan (EMP) Review and Stakeholder Capacity assessment workshop presentation (Anglo American, October 2024), Lucilia Poort Dam-Emergency Preparedness and Response Plan (ARQ, April 2020), Community Emergency Preparedness and Response meeting presentation Q2 (Anglo American, June 2024), Q2 CERP Stakeholder meeting minutes (Anglo American, June 2024), Emergency Preparedness and Response-Stakeholder workshop: TSF Failure Desktop review Attendance Register (Anglo American, February 2024), EMP Report to EMA (2023 Q1, 2024 Q2 and Q3, 2025 Q1), Numerical Groundwater Flow Model (Water Hunters, July 2020), Environmental Best Practice (Anglo American, November 2023) and RWD Project-Contract Completion Certificate (KP. February 2023).<br><br>The Bulk Water Demand and Water Resources Assessment (Bill and Melly Associates, May 2025) and Numerical Groundwater Flow Model (Water Hunters, July 2020) evaluate water supply availability, groundwater conditions, and potential impacts. The design and implementation of the Return Water Dam (RWD) (Knight Piésold, February 2023) demonstrate the implementation of mitigation measures to contain and reuse potentially impacted water and reduce the risk of impacts to surrounding water resources. Across documents, engagement activities with relevant stakeholders, including regulators and affected communities, are described, including their input in evaluating and addressing water-related risks and mitigation measures. Emergency Management Plan reports submitted to the Environmental Management Agency, and stakeholder meeting records (Anglo American, 2023–2025) demonstrate engagement with regulators, local authorities, and |

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| | | | communities regarding water management, risk mitigation, and emergency preparedness.<br>Interviews with key staff further confirm that the mine's stormwater drainage collection system intercepts any potentially mine-impacted water and reroutes it to the PCD, where it is recycled as process water to avoid discharge and minimise impacts on surrounding waterbodies used by communities.<br>The evidence, supported by interviews, indicates that the company has evaluated options to mitigate predicted impacts on water quantity and quality in collaboration with relevant stakeholders and in alignment with the mitigation hierarchy. |
| 4.2.3.2. | If a surface water or groundwater mixing zone is proposed as a mitigation strategy:<br>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<br>b. If any significant risks are identified, the operating company shall develop | — | Not relevant. The company does not use, nor propose to use, a surface water or groundwater mixing zone as a mitigation strategy. Interviews with site management and onsite observations confirm that no surface water or groundwater mixing zone has been implemented or proposed. |

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| | mitigation measures to protect human health, aquatic life and local economies including, at minimum:<br>i. Surface water or groundwater mixing zones are as small as practicable;<br>ii. Water in a surface water mixing zone is not lethal to aquatic life;<br>iii. A surface water mixing zone does not interfere with the passage of migratory fish;<br>iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and<br>v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable. | | |
| 4.2.3.3. | Waters affected by the mining project shall be maintained at a quality that | ◐ | The evidence, supported by interviews and site observations, indicates that the mine operates as a closed water management |

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| | 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:<br><br>a. Being maintained at baseline or background levels; or<br><br>b. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). | | system under normal operating conditions, and that the only surface water discharges from the site are controlled releases from the Return Water Dam (RWD) (see requirement 4.2.4.4 for more detail).<br><br>Additional evidence reviewed includes Water Quality Results (Zimlabs, 2022–2025), multiple ESIAs (Scott Wilson, 2003; Black Crystal Consulting, 2020; Ascon Africa, 2016), Groundwater Monitoring Network Installation documentation (SRK Consulting, 2010), Biodiversity Baseline & Ecosystem Services Assessment Report (UZ, September 2020), Monitoring Program and Operating Procedures and Adaptive Management Plan (Anglo American, July 2022), Environmental Monitoring Points maps and schedules, Ground and Surface Water Monitoring Procedure (UNK-MIN-ENV-PRO-0001, Anglo American, January 2023), and Biomonitoring Assessment of Aquatic Resources (Scientific Aquatic Services, June 2025). The evidence indicates that the company conducts routine surface-water monitoring upstream and downstream of the mine and at groundwater monitoring points, with quarterly sampling conducted in accordance with regulatory requirements. Event-specific monitoring (Zimlabs, 16 and 23 January 2025) includes sampling conducted before and after discharge from the RWD to a wetland that drains to the Umtebekwi Stream. Monitoring includes physical, chemical, and biological parameters and supports evaluation of potential impacts from mining activities and controlled discharge events.<br><br>a. Maintenance at baseline/background levels: The monitoring procedures indicate that the company has established surface water and groundwater monitoring locations and conducts routine sampling to monitor water quality in areas potentially affected by |

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| | | | mining activities. Baseline and background conditions were characterized in ESIAs (Scott Wilson, 2003; Black Crystal Consulting, 2020; Ascon Africa, 2016) and supporting baseline studies (UZ, September 2020). Routine monitoring results (Zimlabs, 2022–2025) provide ongoing water quality data across the monitoring network. The evidence indicates that, under normal operating conditions, the mine functions as a closed water management system with no routine surface water discharges. As a result, site activities generally do not introduce contaminants to receiving surface waters, and baseline or background water quality conditions are largely maintained.<br><br>b. Maintenance at levels that are protective of the identified uses: Water quality results (Zimlabs, 2022-2025) from routine monitoring campaigns indicate that water quality is generally within applicable national regulatory limits, supporting that contaminant concentrations are maintained at levels protective of identified water uses. Biomonitoring assessments (Scientific Aquatic Services, June 2025) further evaluate aquatic ecosystem health and provide supporting evidence that water quality remains protective of aquatic life. Event-specific monitoring results (Zimlabs, January 2026) are compared against IRMA livestock criteria at the RWD and irrigation criteria at the Umtebekwi Stream and indicate manganese and iron concentrations exceed IRMA limits for these uses both before and after discharge, with post-discharge monitoring showing further elevated concentrations.<br><br>The Community Notices of TSF Controlled Discharge (Valterra Platinum, January 2026) and an EMA discharge notification (Valterra Platinum, January 2026) also indicate that controlled discharges from the RWD occur infrequently and only during periods of |

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| | | | excessive rainfall when storage capacity is exceeded. These discharges are conducted under regulatory permits, with prior notification to the environmental regulator and potentially affected communities.<br><br>Interviews with key staff confirmed that there are no other discharge points besides the infrequent discharges from the RWD during the rainy season. Site observations of the area immediately below the RWD confirm that discharge water is attenuated and treated in an engineered wetland prior to reaching downstream waters. Staff interviews and available monitoring information indicate that discharged water is characterized as non-hazardous and non-toxic, and that downstream water quality is not expected to be adversely affected.<br><br>The evidence, supported by interviews, indicates that waters affected by the mining project are generally maintained at baseline water quality levels and that these are protective of community water uses in alignment with sub-requirement (a) and partial alignment with sub-requirement (b), and that discharge events are limited, controlled, monitored, and regulated.<br><br>The evidence does not demonstrate that the potential impacts of occasional discharges containing elevated iron and manganese concentrations on aquatic organisms in the wetland downstream of the RWD and the Umtebekwi Stream have been evaluated. Documentation was not provided demonstrating a systematic comparison of discharge monitoring results with the IRMA Water Quality Criteria for the Protection of Aquatic Organisms, or the implementation of biomonitoring before and after discharge |

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| | | | events, to confirm that water quality is maintained at levels protective of aquatic organisms (b). |
| 4.2.3.4. | Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). | ● | The evidence reviewed includes Location of Future users meeting minutes (Anglo American, October 2019), Bulk Water Demand and Water Resources Assessment for Shurugwi, Zimbabwe (Bill Melly and Associates, May 2025), the 2021 Water Balance Update and Water Management Scenario Analysis (Water Solution, February 2022), and the Water Management Plan (Anglo American, October 2021). The reviewed evidence indicates that the company has identified current and potential future water users (see 4.2.1.2) and has undertaken modelling and assessments to understand mine water consumption and its potential impact on local water supply requirements (see 4.2.2.3). The Bulk Water Demand and Water Resources Assessment for Shurugwi, Zimbabwe (Bill Melly and Associates, May 2025) demonstrates an understanding of water demand and projected consumption, and a stated commitment to providing water to stakeholders. Water balance modelling and feasibility assessments further indicate consideration of water availability under different operational scenarios.<br><br>Interviews with key staff indicate that the company monitors water balance, shares abstraction information with the authorities (ZINWA), and ensures water use remains within permitted thresholds.<br><br>Site observations confirmed that the Lucilia Poort Dam (LPD) is operated by the mine and supplies water to the mine via pipeline. The Dwimbika Stream downstream of the dam consisted of isolated pools with no continuous flow at the time of the site visit (December 2025). According to mine personnel, this channel flows |

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| | | | only during the rainy season, when the reservoir is full, and water overflows the spillway, or when periodic sediment purges from valves at the base of the LPD are performed. The operation of the dam does not maintain a year-round base flow in this river. The company reported that it has supported the establishment of potable water networks supplied by wells not affected by the mining operation, including in the community of Pasimupindu downstream on the LPD, thereby mitigating the absence of flow in the Dwimbika stream during the dry season.<br><br>Relevant staff indicated that surface water flow of the Mutevekwi and Mutevekwana Rivers is not significantly impacted because the mine does not abstract water from them, and water within the mine-affected area is recycled, and there are only occasional discharges from the RWD.<br><br>The evidence, supported by interviews and onsite observations, indicates that mine water abstraction and use are managed within permitted limits and informed by water balance modelling, and that water resources affected by mining activities are maintained at quantities enabling continued use for current and identified future purposes either through retention of water availability in unaffected catchments or, where surface water flow is altered (e.g., downstream of the Lucilia Poort Dam), through the provision of alternative water supplies agreed with stakeholders. |
| 4.2.4.1. | Critical. The operating company shall develop and document a program to monitor changes in water quantity and | ◕ | The evidence reviewed includes the Monitoring Programme Operating Procedures and Adaptive Management Plan (2022 AMP) (Anglo American, July 2022) and its update, which is the Operational Procedure on Water Quality and Quantity Adaptive Management Plan (2025 AMP) (Valterra Platinum, October 2025). Additional |

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| | quality. As part of the program the operating company shall:<br><br>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);<br><br>b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics;<br><br>c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics;<br><br>d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;<br><br>e. Use credible methods and appropriate equipment to reliably | | evidence includes a TSF Hydrogeological Investigation (Knight Piésold, July 2025), a Water Monitoring Schedule for 2025 (Valterra Platinum, no date), a List of Environmental Monitoring Points 2025 (Anglo American, no date), a Ground and Surface Water Monitoring Procedure (Anglo American, January 2023), and Schedules of Accreditation for GNK Laboratories (SADCAS, May 2025) for chemical and microbiological analysis.<br><br>The company has developed a program to monitor water quality and quantity characteristics, which includes the following:<br><br>a. The 2025 AMP describes monitoring of surface water quality at six (6) compliance locations, including up-, mid-, and downstream locations (one [1] at Lucilia Poort Dam, two [2] along the Umtebewki Stream, and three [3] along the Mutevekwana Stream), as well as at seven (7) operational control locations (e.g., sewage plant, leachate pond, and TSF seepage). Groundwater quality and phreatic levels are monitored at 28 compliance points across the operational area of the mine (adjacent and downgradient of processing and waste management facilities, and the TSF), as well as downstream of the TSF. The 2025 Water Monitoring Schedule indicates quarterly sampling at five (5) surface and eleven (11) groundwater locations. Water quality samples are analysed for general physical parameters (pH, electrical conductivity, total dissolved solids, suspended solids, turbidity, dissolved oxygen), major ions (calcium, magnesium, sodium, potassium, chloride, sulphate, nitrate, and phosphate), metal content (fluoride, aluminium, iron, manganese), hardness, alkalinity (as $CaCO_3$), and sodium adsorption ratio (SAR). The TSF Hydrogeological Investigation (KP, July 2025) indicates that the mine's impact on groundwater systems through water abstraction at well fields or seepage from the TSF is limited. The mine does not |

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| | detect changes in water characteristics; and<br><br>f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables. | | discharge or abstract water from the surrounding rivers, Mutevekwi and Mutevekwana. Qualitative drainage analysis indicates that the mine effects only a small fraction of basin surface water runoff, as the TSF and processing area occupy a minor portion of the catchment. During peak rains, controlled releases from the Return Water Dam (RWD) pass through an artificial wetland that slows flows and improves water quality before discharge, and a sample of event-specific monitoring results (Zimlabs, 16 and 23 January 2025) indicates monitoring at the RWD, two (2) wetland ponds, and the Umtebewki Stream before and after discharge events.<br><br>b. The 2025 AMP states that quarterly water quality sampling is conducted at the locations listed in sub-requirement (a). The 2025 Water Monitoring Schedule indicates quarterly sampling at five (5) surface and 11 groundwater locations, but different frequencies for other locations (e.g., annual sampling at village boreholes). The evidence also includes a sample of event-specific monitoring results associated with a controlled discharges from the RWD, with samples collected before and after discharge of RWD water (Zimlabs, 16 and 23 January 2025).<br><br>c. The 2025 AMP includes a Trigger Action Response Plan (TARP) for water quality parameters for effluents, receiving waters, and groundwater, as well as water quantity at abstraction wells and the Lucilia Poort Dam (see 4.2.4.4).<br><br>d. This sub-requirement is not applicable because no mine-affected water is sent off-site for re-use by non-mining entities. According to interviews with key personnel, process water is recycled on-site, stormwater is collected and reused in processing, and any |

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| | | | discharge occurs only during storm events, in accordance with permit conditions.<br><br>e. The Ground and Surface Water Monitoring Procedure outlines the calibration and use of field sampling equipment, in-field parameter collection, quality control, and record keeping. Provisions are included for measurements of phreatic levels and water quality sampling in boreholes (including purging of standing water using a submersible pump to draw in groundwater and recover to at least 85% of the initial rest level); and for surface water quality monitoring with in-situ measurements and grab samples (including requirements for sample cooling, transport, and chain of custody). A review of the Environmental Coordinator's CV confirms that the individual responsible for monitoring is appropriately qualified.<br><br>f. The Schedules of Accreditation for GNK Laboratories and a sample of laboratory results (GNK Laboratories, 2022–2025) indicate that the company uses an accredited laboratory from Zimbabwe for laboratory analysis. A sample of laboratory results (GNK Laboratories, July and September 2025) for effluents, groundwater, and surface water indicates that the laboratory is capable of detecting contaminants at levels below the values specified in the IRMA Water Quality Criteria by End-Use Tables.<br><br>Interviews with relevant staff indicate that surface water flows in the Mutevekwi and Mutevekwana Rivers are not monitored because water within the mine-affected area is recycled, with only occasional releases from the RWD.<br><br>The evidence indicates that the company's water monitoring program is substantially aligned with sub-requirements (a) to (c) |

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| | | | and fully aligned with sub-requirements (e) and (f). Sub-requirement (d) is not relevant.<br><br>The evidence does not include documents to confirm the company has developed and implemented procedures for sub-requirements (a) through (c) for the Dwimbika stream downstream of the LPD. |
| 4.2.4.2. | Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis. | ◐ | The evidence reviewed includes the EIA for Smelter (Ascon Africa, March 2016), the PCD Expansion Project (Black Crystal Consulting, May 2020), and the Water Augmentation Project (Black Crystal Consulting, August 2020). Additional evidence includes the Ground and Surface Water Monitoring Procedure (Anglo American, January 2023) and the Water Quality and Quantity Adaptive Management Plan (Valterra Platinum, October 2025), a TSF Effluent Disposal License and PCD Effluent Disposal License (Environmental Management Agency, January 2025), TSF Hydrogeological Investigation (Knight Piésold, July 2025), and Water Quality Analysis Results (Zimlabs, August 2022).<br><br>The Ground and Surface Water Monitoring Procedure and Water Quality and Quantity Adaptive Management Plan (Anglo American, 2023 and 2025) define sampling locations, monitoring frequencies, and analytical requirements. Effluent disposal licenses issued by the Environmental Management Agency (January 2025) specify parameters required for compliance monitoring. Laboratory analytical results (Zimlabs, August 2022) demonstrate analysis of multiple parameters, including pH, turbidity, sulphates, and metals, and hydrogeological and environmental assessments (Knight Piésold, July 2025; Black Crystal Consulting, 2020; Ascon Africa, 2016) |



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| | | | identify potential sources of water quality impacts associated with mining activities.<br><br>The evidence indicates that the company analyses water samples for a range of physico-chemical parameters relevant to effluent discharges and receiving water environments.<br><br>The evidence does not include documentation demonstrating that all parameters with a reasonable potential to adversely affect identified current and future water uses have been systematically identified based on baseline or background monitoring, source characterization, modelling, or other site-specific information. The evidence also does not include documented justification for excluding parameters from routine monitoring based on a demonstrated lack of reasonable potential to exceed baseline or background values or applicable water quality criteria. |
| 4.2.4.3. | The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:<br><br>a. Participation may involve the use of independent experts selected by the community; and<br><br>b. If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be | ● | The evidence reviewed includes Community Environmental Committee (CEC) Terms of Reference (Anglo American, June 2023), Community Engagement Forum (CEF) meeting minutes (Q2 and Q4 2023 and Q1-Q3 2024), and a sample of Participatory Monitoring Attendance Reports and Attendance Registers (Unki Mine, 2021–2025). The evidence indicates that the company has invited stakeholders to participate in the water monitoring, including:<br><br>a. Stakeholder participation and use of independent experts: The CEC Terms of Reference (Anglo American, June 2023) specify that committee members are to be physically present during environmental monitoring activities, including water sampling, and participate in the development of environmental monitoring indicators in collaboration with the mine. The Terms of Reference |

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| | covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed. | | further state that the committee may, when considered necessary, retain independent consultants or advisors to support the committee on matters within its mandate, at the company's expense. CEF meeting minutes (Q3, Anglo American, September 2024) demonstrate that water monitoring results are routinely presented to the committee, and that the results show water quality meets agricultural, livestock, and irrigation uses. The sample of Participatory Monitoring Attendance Reports and Attendance Registers confirms stakeholder involvement in water quality monitoring activities.<br><br>b. Coverage of costs: The CEC Terms of Reference indicate that the committee is permitted to engage independent experts or consulting firms to undertake monitoring or provide technical advice, with costs to be covered by the company.<br><br>Interviews with key staff confirm that CEC members participate in water sampling activities, that monitoring results are shared with and discussed by community representatives, and that the company would pay for independent experts if requested by the committee.<br><br>The evidence, supported by interviews, indicates that the company solicits stakeholder participation in water quality monitoring and allows and would provide funding for independent experts, selected by the members of the community committee. |
| 4.2.4.4. | Critical. The operating company shall develop and implement an adaptive management plan for water that: | ◕ | The evidence reviewed includes the Monitoring Programme Operating Procedures and Adaptive Management Plan (2022 AMP) (Anglo American, July 2022) and its update, the Operational Procedure on Water Quality and Quantity Adaptive Management |

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| | 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<br><br>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. | | Plan (2025 AMP) (Valterra Platinum, October 2025). Key risks identified in the 2025 AMP include the potential discharge of excess supernatant water from the Tailings Storage Facility (TSF) or water from the Pollution Control Dam (PCD) into the environment, insufficient borehole yields at water abstraction wells, and sedimentation of the Lucilia Poort Dam (LPD).<br><br>a. The 2022- and 2025-AMPs outline water management measures to prevent predicted impacts on water quality and quantity by containing mine-affected water within the operational areas of the mine, optimizing reuse, and maintaining storage capacity for excess water, particularly during the rainy season. These measures include cutoff ditches that limit the surface area of stormwater capture to the operational areas, and stormwater drains that channel mine-affected water to the PCD for recycling and reuse at the plant. Treated effluent from the wastewater treatment plants is also directed to the PCD. The PCD was enlarged and upgraded in 2022 to reduce the potential for discharge. To further reduce the need for water abstraction, the mine recycles water ponding at the TSF by pumping it back to the site's concentrator for re-use in processing. The potential for excess supernatant discharge from the TSF was mitigated by constructing a Return Water Dam (RWD) to store excess TSF pond water. Controlled seasonal discharges from the RWD may occur after heavy rainfall, only after water quality testing and notification of governmental authorities and communities. Low water production yields in boreholes are being assessed and mitigated through additional studies on sustainable pumping and the development of a water-use hierarchy to conserve resources. Implementation of the water use hierarchy is documented by correspondence on the site's water use (Unki Water Report, Unki |

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| | | | Mines, October 2025), which documents water recycling rates. Sedimentation within the LPD is monitored by observing upstream activities, such as mining, that may cause siltation (2025 AMP). Qualitative drainage analysis indicates that the mine effects only a small fraction of basin surface water runoff, as the TSF and processing area occupy a minor portion of the catchment.<br><br>b. The 2025 AMP includes a four-tier (green, yellow, orange, red) Trigger Action Response Plan (TARP) with escalating thresholds for water-quality parameters in effluents, receiving surface waters, and groundwater, as well as for water-abstraction rates from wells and the Lucilia Poort Dam. The four-tier trigger levels are set below regulatory compliance limits and are based on percentages of the IRMA water quality criteria for freshwater or drinking water (e.g., less than 50%, less than or equal to 50%, less than or equal to 75%, and at the IRMA criterion). Trigger levels for water abstraction rates are based on percentages stipulated in the water use license. The plan specifies response actions for each tier, ranging from continuing quarterly sampling and trend analysis to increasing sampling frequency, evaluating the effectiveness of the management plan, implementing specific, predetermined corrective actions (e.g., installing liners, containing pollution sources), and communicating with relevant stakeholders. The Environmental Officer at the mine is listed as the responsible person. The Community Notices of TSF Controlled Discharge (Valterra Platinum, January 2026) and an EMA discharge notification (Valterra Platinum, January 2026) confirm that the mine notifies the environmental regulator and potentially affected communities prior to controlled discharges from the RWD. A sample of monitoring results (Zimlabs, 16 and 23 January 2025) confirms water quality sampling at the RWD, the wetlands, and the |

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| | | | receiving waters of the Umtebekwi Stream, conducted before and after controlled discharges from the RWD.<br><br>Field visits included the LPD and the Dwimbika Stream, which drains the dam. The dam is operated by the mine, and a water supply pipeline connects the reservoir to the mine. At the time of the visit (December 2025), the channel below the dam contained a series of pools but no flow. According to mine personnel, this channel flows only during the rainy season, when the reservoir is full and water overflows the spillway, or when periodic sediment purges from valves at the base of the LPD are performed. The operation of the dam does not maintain a year-round base flow in this river.<br><br>Interviews with key staff indicate that the company has installed wells around the TSF to monitor and manage potential mine-affected seepage, which is collected in a seepage sump and subsequently sent to a water tank for recycling. Personnel explained that they hold an EMA permit for the controlled release of non-toxic water from the RWD to an artificial wetland before it reaches the Mutevekwi River. These releases are occasional during the rainy season. The company reported that it has supported the establishment of potable water networks supplied by wells not affected by the mining operation, including in the community of Pasimupindu downstream on the LPD, thereby mitigating the absence of flow in the Dwimbika stream during the dry season. Mine personnel also noted that only a negligible amount of groundwater infiltrates the underground mine because the shallow aquifer is largely isolated from the mine by impermeable geologic units (aquitards). Relevant staff indicated in the field that surface water flow of the Mutevekwi and Mutevekwana Rivers is not |

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| | | | significantly impacted, because water within the mine-affected area is recycled, and there are only occasional discharges from the RWD.<br><br>The evidence, supported by interviews, indicates that the company has developed an adaptive management plan and implemented several preventative mitigation measures for water management, substantially aligned with sub-requirements (a) and (b).<br><br>The evidence does not include a rationale for not maintaining baseflows in the Dwimbika stream downstream of the LPD (a), and details confirming the company has established triggers for water quality and quantity in the Dwimbika stream or in the seasonal discharges from the RWD, as per sub-requirement (b). |
| 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. | ● | The evidence reviewed includes the Water Quality and Quantity Adaptive Management Plan (UNK-MIN-ENG-PRO-0122, Anglo American, October 2025), which replaces the Monitoring Programme, Operating Procedures and Adaptive Management Plan (Anglo American, July 2022); the TSF OMS Manual (KP, April 2023) and its subsequent update (KP, April 2025); and the Pollution Control Dam (PCD) Operational Manual (Ilifa African Engineers, September 2021), which was updated following infrastructure expansion.<br><br>The Water Quality and Quantity Adaptive Management Plan (October 2025) explicitly replaces the previous adaptive management plan (July 2022), demonstrating that the adaptive management framework has been reviewed and formally revised within the past 12 months. The revised plan incorporates updated monitoring requirements, operational controls, and management |

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| | | | measures, reflecting changes in site infrastructure and water management systems.<br>The updated TSF OMS Manual (April 2025) and revised PCD Operational Manual further demonstrate that water management-related operational controls and infrastructure design elements have been reviewed and updated to reflect operational changes, including modifications associated with water storage and control structures.<br>The evidence indicates that the company has reviewed and revised its adaptive water management plan and associated operational procedures within the past 12 months. |
| 4.2.4.6. | Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans. | ● | The evidence reviewed includes the Q3 CEF Agenda and Presentation (Valterra Platinum, September 2025) and the adaptive water management plan awareness section (p. 21) provides evidence of the sharing of the adaptive water management plan with communities and of opportunities for them to provide feedback on the plan. The presentation includes information on how the mine uses water (e.g., water recycling through the PCD, TSF, and related infrastructure) and an explanation of incident severity levels (green, yellow, orange, red), with red denoting emergency conditions requiring immediate action.<br>Interviews with relevant staff confirm that stakeholders were provided the opportunity to ask questions and provide feedback on the adaptive water management plan during the Q3 CEF meeting, and that no amendments to the management plan were requested. |

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| | | | The evidence, supported by interviews, indicates the company has provided community stakeholders with the opportunity to review its adaptive water management plan and propose amendments. |
| 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:<br><br>a. Monitoring data for surface water and groundwater points of compliance; and<br><br>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. | ◐ | The evidence reviewed includes a sample of quarterly conducted CEF meeting minutes and attendance registers (Anglo American, Q2 and Q4 2023; Q1–Q3 2024) and a sample of Participatory Monitoring Attendance Reports and Attendance Registers (Unki Mine, 2021–2025), which indicate that the company conducts participatory water monitoring programs and shares summaries of water quality results with community stakeholders, including information on suitability for agricultural, livestock, and domestic uses.<br><br>Interviews confirm that monitoring data is also regularly submitted to the environmental regulator (EMA) in accordance with regulatory requirements.<br><br>The evidence, supported by interviews, indicates that water monitoring data is collected and shared with regulators and communities through participatory monitoring and stakeholder engagement processes.<br><br>The evidence does not include documentation confirming that baseline or background water quantity and quality data, or annual monitoring data for surface water and groundwater points of compliance (a), water quantity, abstraction volumes, and discharge volumes (b), are publicly published and accessible (e.g., company reports, publicly accessible databases, websites). |

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| 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. | ● | The evidence reviewed includes the TSF drill Report (Anglo American, March 2025), the TSF Main Wall drill report (Anglo American, April 2022), the TSF drill survey outcomes (Anglo American, May 2025), and the TSF TARP (Anglo American, March 2024).<br><br>The TSF Drill Report (Anglo American, March 2025) documents activation of an emergency siren and associated community response during an emergency drill, demonstrating the presence and testing of an alert mechanism intended to notify potentially affected communities. Trigger Action Response Plans (Anglo American, March 2024) define response actions and escalation protocols associated with potential TSF-related risks.<br><br>Interviews with key staff and stakeholders indicate that procedures are in place to notify regulators and communities prior to controlled releases of water from the Return Water Dam. Staff reported that notifications are provided in advance of releases, and representatives of the Environmental Management Agency and community stakeholders confirmed awareness of this notification process.<br><br>The evidence indicates that the operating company has implemented procedures, including emergency alert systems and stakeholder notification protocols, to rapidly communicate with relevant stakeholders in the event of changes in water quantity or quality that may pose a threat to human health, safety, or environmental resources. |
| 4.2.5.3. | The operating company shall discuss water management strategies, | ● | The evidence reviewed includes a sample of quarterly conducted Community Environmental Forum (CEF) meeting minutes and |

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| | performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders. | | attendance registers (Anglo American, Q2 and Q4 2023; Q1–Q3 2024). Attendance registers indicate that meetings are attended by a broad range of stakeholders, including community representatives, traditional leaders, regulatory authorities, local government officials, and civil society organizations. The meeting minutes document that the company presents and discusses water management strategies, water quality monitoring results, and water management performance with stakeholders. These discussions include summaries of water-quality monitoring results and updates on water-management activities and controls. Participatory Monitoring Attendance Reports (Unki Mine, 2023–2025) further demonstrate stakeholder involvement in water quality monitoring programs, confirming direct stakeholder engagement in monitoring processes and outcomes.<br><br>Interviews with key staff confirmed that the company regularly engages with stakeholders, including the Shurugwi Town Council and community representatives, on water-related issues, such as water resource management and siltation at Lucilia Poort Dam. Community stakeholders interviewed confirmed that participatory water monitoring programs are conducted and that monitoring results and water management issues are communicated and explained during community engagement meetings, including the CEF.<br><br>The evidence, supported by interviews, indicates that the company discusses water management strategies, performance, and monitoring results quarterly with a broad range of stakeholders through its CEF. |

# Chapter 4.3—Air Quality

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 92% |
| Chapter Score Basis | 16.5 out of 18 possible points |

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| 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. | ◔ | The evidence reviewed includes an Air Quality Management Plan (AQMP) (Airshed Planning Professionals (APP), June 2021), an Air Dispersion Modelling Study for the hazardous waste incinerator (APP, January 2021), the Smelter Environmental Impact Assessment (EIA) (Ascon Africa, March 2016), the Waste Incinerator EIA (BlackCrystal, August 2020), and the Environmental and Social Impact Assessment for the Solar PV Facility (Solar PV ESIA) (SLR, June 2023). These documents demonstrate air quality screening through baseline air quality and meteorological data, identification of emission sources, emissions inventories, identification of sensitive receptors, and dispersion modelling of key pollutants (including $PM_{10}$, $PM_{2.5}$, $SO_2$, $NO_2$, CO), as well as trace pollutants associated with the waste incinerator. Dispersion modelling using AERMOD and Atmospheric Dispersion Modelling System (ADMS) was applied to assess potential off-site impacts and compliance with applicable Zimbabwean and international air quality standards.<br><br>The evidence indicates that the operating company has carried out air quality screening for $PM_{10}$, $PM_{2.5}$, $SO_2$, $NO_2$, and CO when operational changes or additions occur, and for additional air quality parameters (e.g., nickel, mercury) in relation to the waste |

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| | | | incinerator, to determine whether these may result in significant air quality impacts.<br>The evidence does not provide details to confirm that all potentially relevant air pollutants, including trace metals (e.g., arsenic, cadmium, chromium, nickel, lead, mercury), have been systematically considered across all emission sources beyond the waste incinerator, nor does it provide a justification for their exclusion or evidence to support their absence (e.g., soil samples over time). |
| 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. | ● | The evidence reviewed includes the initial Environmental Impact Assessment (Scott Wilson, 2003), which provides a qualitative characterization of pre-operation air quality conditions for the mine area. The Smelter Environmental Impact Assessment (Ascon Africa, 2016) includes quantitative baseline ambient air quality data collected in 2015 prior to smelter commissioning, covering $PM_{10}$, $PM_{2.5}$, $SO_2$, $NO_2$, and CO.<br>The Air Quality Management Plan (APP, June 2021) describes historical baseline monitoring campaigns and background dust fall measurements at locations away from operational sources. The Air Dispersion Modelling Study for the hazardous waste incinerator (APP, January 2021) incorporates meteorological and ambient pollutant data to characterize background conditions. Additional baseline ambient monitoring data for $PM_{10}$ and $PM_{2.5}$ (2016–2020) are referenced in the Solar PV Facility ESIA (SLR, June 2023).<br>The evidence indicates that the company has established baseline air quality prior to commissioning of the mine and the addition of |

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| | | | major emission sources, with ongoing monitoring data collection for the wider project area. |
| 4.3.1.3. | If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts. | ◔ | The evidence reviewed includes the AQMP (APP, June 2021), which presents an emissions inventory and AERMOD dispersion modelling comparing predicted concentrations with regulatory standards and health-based guideline values. The study identifies potential exceedances of $PM_{10}$ at specific receptors and compliance with $PM_{2.5}$ and dust fallout. The Incinerator Modelling Study (APP, January 2021) evaluates incremental concentrations of criteria and non-criteria pollutants using ADMS and compares the results against national and international standards. The AQMP Review (Valterra Platinum, July 2025) summarises recent monitoring data and mitigation measures, supporting the ongoing assessment of impacts. The Smelter ESIA indicates that air quality impacts from the smelter furnace and flash dryer during operational phases are categorized as "high". The Waste Incinerator ESIA indicates that impacts on employees and the community are "insignificant". Screening analyses identified pollutants with potential for significant impact, justifying additional modelling.<br><br>Interviews with community stakeholders indicate that dust from the TSF occasionally poses a nuisance and that, in response to their grievances, the company has conducted additional air-quality monitoring. Community stakeholders did not report any significant health impacts attributable to air quality. A nurse from a nearby village noted that respiratory conditions, such as coughs, are prevalent in the area, but explained that these are common locally and are most likely associated with the use of wood-burning ovens in households rather than mining-related air quality impacts. |

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| | | | The evidence indicates that the company has undertaken assessments to predict and evaluate the significance of potential air quality impacts from emission sources, using emissions inventories, dispersion modelling and comparison with standards and health-based guideline values.<br><br>The evidence does not indicate that the company has conducted a comprehensive assessment that considers cumulative and long-term impacts resulting from the combination of emissions from the mine, concentrator, smelter, TSF and incinerator. |
| 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 evidence reviewed includes the AQMP (APP, June 2021), which describes the use of the US EPA AERMOD dispersion model, incorporating emissions inventories, receptor grids, and meteorological datasets to estimate the concentrations, transport, and dispersion of pollutants (TSP, $PM_{10}$, $PM_{2.5}$, $SO_2$, $NO_2$, and CO). The methodological overview outlines the modelling approach in accordance with widely accepted and documented practices. The Air Dispersion Modelling Study for the hazardous waste incinerator (APP, January 2021) documents the application of the ADMS 5 dispersion model using MM5 meteorological data, terrain inputs, and a multi-pollutant emissions inventory including criteria pollutants, metals, VOCs, HCl, HF and dioxins/furans. The report presents the modelling domain, scenarios analysed and comparisons against Zimbabwean and international guideline values.<br><br>The AQMP Review (Valterra Platinum, July 2025) summarises ongoing ambient air-quality monitoring undertaken by Toltecs Pvt Ltd and describes the use of reference-method equipment and procedures for particulate matter and trace-gas monitoring. The |

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| | | | AQMP also identifies a network of nine (9) stations distributed across the project area.<br>Interviews with relevant staff confirm that the modelling exercises followed internationally accepted methodologies, and that monitoring is carried out using adequate equipment by a third party that is qualified to do so.<br>The evidence indicates that the company uses widely accepted and documented methodologies for air-quality modelling and monitoring, specifically AERMOD, ADMS 5, MM5 meteorology, and reference-method ambient sampling, to estimate the concentrations, transport, and dispersion of mining-related air contaminants. |
| 4.3.2.1. | Critical. If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality. | ● | The evidence reviewed includes an Air Quality Management Plan (AQMP) (APP, June 2021), an AQMP Update (Valterra Platinum, July 2025), and an Environmental Management Plan and Monitoring Report (Anglo American, no date) for Q1 2025. The AQMP identifies key emission sources (e.g., smelter stack, generators, crushing) and outlines mitigation measures, including enclosed conveyors, crusher water sprays, routine maintenance, low-sulphur fuel use, dust suppression, land rehabilitation, and speed limits, in addition to avoidance measures incorporated into the smelter design and the selection of a state-of-the-art waste incinerator, as documented in the Environmental Impact Assessments (Smelter EIA, Ascon Africa, March 2016; Waste Incinerator EIA, BlackCrystal, August 2020). Implementation evidence includes maintenance records for equipment, baghouses, the main stack, and generators (Valterra Platinum, 2025), as well as Environmental Management Plans documenting restricted land clearing (Anglo American, 2024; and |

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| | | | Valterra Platinum, 2025). Dust suppression is evidenced by water use records for mine and access roads (Valterra Platinum, April - October 2025).<br><br>Quarterly third-party Air Quality Survey Reports (Toltecs, Q1 2023–Q1 2025) indicate that most monitored pollutants are managed in accordance with applicable regulatory and licensing frameworks. Occasional $PM_{10}$ exceedances are primarily attributed to external sources. Isolated exceedances of $SO_2$ ambient concentrations have been observed at the smelter.<br><br>Onsite observations confirm the implementation of air quality management measures outlined in the AQMP. Interviews with staff indicate that the company emits approximately 63 tonnes of $SO_2$ annually, which is considered minor in the global context of platinum smelting. Given the small production capacity, the company currently considers $SO_2$ abatement measures, such as acid plants and scrubbers, to be technically and economically impractical.<br><br>The evidence, supported by on-site observations and interviews, indicates that the company has developed and maintains an air quality management plan and has implemented measures to avoid significant impacts on air quality, or, where avoidance is not feasible, minimize them. |
| 4.3.2.2. | Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life. | ● | The evidence reviewed includes the Air Quality Management Plan (AQMP) (APP, June 2021), which defines the mine's overarching air quality management strategy, including emissions inventories, mitigation measures, and dispersion modelling outputs. The AQMP outlines operational controls, including dust suppression, traffic |

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| | | | management, equipment maintenance, and smelter emissions control technologies. Additional evidence includes the AQMP Review (Valterra Platinum, July 2025), which evaluates ambient monitoring results and recommends improvements to emission controls and monitoring frequency. The review summarises data trends and discusses the adequacy of implemented mitigation measures. A sample of Quarterly Ambient Air Quality Survey Reports (Toltecs, Q1 2023–Q1 2025) documents routine monitoring of stack emissions and ambient concentrations of $PM_{10}$, $PM_{2.5}$, $SO_2$, and $NO_x$ across multiple receptor locations within the mine and surrounding communities. These reports indicate occasional guideline exceedances (e.g., $PM_{10}$ peaks at certain downwind receptors), periods of compliance, and recommended adjustments such as enhanced dust suppression, haul road maintenance, and verification of smelter stack performance. Monitoring results are consistently linked to operational recommendations in the evaluation and recommendation sections (e.g., Q4 2023).<br><br>The 2025 Environmental Programmes (Unki Mine, 2025) outline planned air-quality actions, such as maintaining dust-suppression systems, upgrading monitoring equipment, and implementing mitigation priorities based on monitoring trends.<br><br>The evidence indicates that the company implements air quality management strategies and related operational controls, and that these strategies are periodically updated through monitoring reports, technical reviews, and annual environmental programmes. |
| 4.3.3.1. | The operating company shall monitor and document ambient air quality and dust associated with the mining project | ● | The evidence reviewed includes a sample of Quarterly Ambient Air Quality Survey Reports (Toltecs, Q1 2023–Q1 2025). Toltecs is identified as the consultant responsible for conducting ambient |

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| | by using personnel trained in air quality monitoring. | | monitoring of $PM_{10}$, $PM_{2.5}$, $SO_2$, $NO_2$, CO, and dust fallout at multiple monitoring locations. The reports describe monitoring procedures, instrument calibration, QA/QC steps, and the evaluation of results against Zimbabwean standards (ZWS 977).<br><br>The Capability Statement Toltecs 2025 Revision (Toltecs, 2025) provides detailed documentation of the company's technical competencies. It identifies Toltecs as an Environmental Management Agency (EMA) Approved Inspection Authority for air emissions monitoring and air quality assessments, and describes the qualifications of key personnel, including ISO technical expert credentials and specialized training in emissions monitoring, air quality risk assessment, and environmental sampling. The capability statement also lists extensive experience in environmental monitoring across industry and mining sectors.<br><br>Interviews with relevant staff indicate that monitoring locations have been informed by the modelling results, sensitive receptors, and community grievances, and that monitoring is carried out using adequate equipment by a third party that is qualified to do so.<br><br>The evidence indicates that the company monitors and documents ambient air quality and dust associated with the mining project through periodic surveys conducted by a third party whose personnel are trained, recognized, and certified as qualified air quality monitoring specialists. |
| 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 | ◔ | The evidence reviewed includes the Air Quality Management Plan (AQMP) (APP, June 2021), which identifies nine (9) ambient air quality monitoring stations located around key operational areas, including the smelter, portal, and tailings storage facility, as well as |

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| | 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. | | at nearby sensitive receptors such as the Mtevekwe Primary School, Makwikwi, and the Chironde Rural Health Centre. The AQMP states that the selection of monitoring locations was informed by dispersion modelling and the identification of community receptors likely to be affected by mining emissions. The AQMP also describes the dust fall monitoring network around the TSF and recommends additional monitoring sites in areas influenced by operational dust generation and transport activities, including potential locations along the smelter–slag dump route and the portal access road.<br><br>A sample of quarterly third-party Air Quality Survey Reports (Toltecs, Q1 2023–Q1 2025) confirms continued monitoring at the AQMP-defined stations and documents ambient concentrations of particulate matter and gases, demonstrating implementation of a network covering the mine site and surrounding communities. The Air Quality Management Plan Update/Dust Management Plan (Valterra Platinum, July 2025) includes updated maps of the monitoring locations and describes that the siting of stations is based on emission sources, receptor locations, and results from dispersion modelling.<br><br>Interviews with the environmental manager confirmed that the location of air quality monitoring stations has been informed by air quality modelling results, as well as stakeholder grievances regarding dust. Some community stakeholders reported that dust generated by mine-related traffic on the access road passing near their villages is a nuisance.<br><br>The evidence, supported by interviews, indicates that the air quality monitoring network is designed to collect representative ambient |

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| | | | air quality data at sensitive receptors and is informed by air quality modelling results.<br><br>The evidence does not include details to confirm that the monitoring network includes stations located along transportation routes associated with the mining project, particularly where those routes extend beyond the immediate mine area, are affected by increased traffic during shift changes, and pass near affected communities. |
| 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:<br><br>a. If a mine is located in an airshed 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 | — | Not scored. Per IRMA guidance this requirement can be marked "not scored". The evidence reviewed includes the Air Quality Management Plan (APP, June 2021) and indicates the company follows Zimbabwean ambient guideline limit values (ZWS977) for PM10, PM2.5 and SO2, and where no guideline values exist (e.g., NO2, CO), follows the strictest international best practice standard or guidelines (e.g., WHO). |

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| | b. If a mine is located in an airshed 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 airshed that are at least equivalent to the mining project's emissions. | | |
| 4.3.4.2. | As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:<br>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;<br>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; | — | Not scored. Per IRMA guidance, this requirement can be marked "not scored". The evidence reviewed includes the Air Quality Management Plan (APP, June 2021) and indicates the company follows Zimbabwean ambient guideline limit values (ZWS977) for PM10, PM2.5, and SO2, and where no guideline values exist (e.g., NO2, CO), follows the strictest international best practice standard or guidelines (e.g., WHO). |

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| | 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<br>d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines. | | |
| 4.3.4.3. | Dust deposition from mining-related activities shall not exceed 350 mg/m2/day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination. | — | Not scored. Per IRMA guidance, this requirement can be marked "not scored". The evidence reviewed includes a sample of quarterly third-party Air Quality Survey Reports (Toltecs, Q1 2023–Q1 2025), indicating that the company is not required to measure dust deposition. |
| 4.3.5.1. | The operating company shall ensure that its air quality management plan and compliance information is up-to- | ● | The evidence reviewed includes the Unki Safety, Health and Environment (SHE) Policy (Unki Mines, July 2025), which commits to making safety, health, and environmental information available to interested parties upon request. The Community Environmental |

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| | date and publicly available, or made available to stakeholders upon request. | | Performance Presentation for Q1 2025 (Unki Mines, 2025) summarizes environmental performance indicators, including air quality monitoring results, incidents, and grievances, and is intended for communication with community stakeholders.<br><br>The Non-Technical Summary (NTS) of the Solar PV Facility ESIA (SLR Consulting, May 2023) describes mechanisms for public access to environmental information, including the availability of full ESIA documentation at the mine office and online during disclosure periods. In addition, air quality monitoring and impact assessment reports prepared by external consultants (e.g., Unki South Blasting Environmental Impact Survey Report, Toltecs, September 2023) document ambient air quality results and compliance with national standards, which are submitted to the Environmental Management Agency.<br><br>Interviews with staff confirm that the air quality management plan and monitoring information are maintained and would be shared upon request. Community stakeholders further reported that participatory air quality monitoring campaigns are conducted and that monitoring results are communicated and explained during regular community engagement meetings.<br><br>The evidence, supported by interviews, indicates that the company maintains up-to-date air quality management and compliance information and makes it available to stakeholders through policy commitments, periodic community reporting, public ESIA disclosure processes, and upon request. |

# Chapter 4.4—Noise and Vibration

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 78% |
| Chapter Score Basis | 12.5 out of 16 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 4.4.1.1. | The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project's noise and/or vibration. Screening is required at all new mines, and also at existing mines if there is a proposed change to the mine plan that is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels. | ● | The evidence reviewed includes the initial Environmental Impact Assessment (EIA) (Scott Wilson, 2003), the Smelter Environmental Impact Study (Ascon Africa, 2016), an Environmental Prospectus & Environmental Management Plan Report for the Proposed Unki South Bulk Sample Collection (Black Crystal, September 2021), and an Environmental and Social Impact Assessment for the Solar PV Facility at Unki Mine (SLR Consulting, 2023). These assessments identify potential noise and vibration impacts during construction and operational phases and consider offsite receptors, including nearby communities, residential camps, and other sensitive locations.<br><br>Ongoing and project-specific screening is further supported by monitoring and evaluation reports, including the Community Noise Survey Report (Valterra Platinum, May 2022), an Environmental Noise Monitoring Report – Q3 2025 (Valterra Platinum, 2025), a sample of Unki South Blasting Environmental Impact Survey Report (Toltecs, September 2023), and a sample of Blast-Induced Vibration Monitoring Reports for the TSF Extension Project Blasts 1-4 (Optimal Blasting Solutions, June to August 2025). These documents use measured noise and vibration data and compare results against applicable national standards, international guidelines (including |

| Req # | Requirement | Score | Basis for Rating |
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| | | | IFC/WHO), and IRMA criteria to evaluate whether blasting, plant operations, and new developments may result in significant offsite impacts.<br><br>The evidence indicates that the company has carried out screening to determine whether there may be significant impacts on offsite human noise receptors from project-related noise and vibration, as demonstrated by assessments and monitoring undertaken for changes to the mine plan, including the Unki South Bulk Sample Collection project, the TSF Extension Project blasting activities, and the Solar PV Facility development. |
| 4.4.1.2. | If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors. | ◐ | The evidence reviewed includes an initial Environmental Impact Assessment (Scott Wilson, September 2003) and the Environmental and Social Impact Assessment for the Solar Photovoltaic Facility (SLR Consulting, 2023), which identify communities in proximity to mine operations and acknowledge them as sensitive human noise receptors.<br><br>Additional evidence includes the Assessment of Unki Activities Impact on Community – Noise Survey Report (Anglo American, May 2022), which documents daytime noise measurements at selected community locations and on-site camps located approximately 600 m to 5 km from the mine and along transportation routes. The survey distinguishes between periods with and without traffic.<br><br>The Q3 2025 Environmental Noise Monitoring Report (Valterra Platinum, August 2025) presents measured noise levels at several offsite community locations and on-site camps during daytime (6:00–22:00) and nighttime (22:00–6:00) periods and compares the results against IFC guideline values. The Blasting Impact |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Assessment Report (Toltecs, September 2023) provides short-term noise measurements during blasting events in nearby villages.<br>The evidence reviewed indicates that the company has identified human noise receptors (e.g., residential areas, schools, community gathering points) and conducts periodic operational and event-based noise monitoring at these locations.<br>The evidence does not provide information to confirm that the company has documented baseline ambient noise levels assessment conducted prior to mining operations at the nearest and relevant offsite receptors, or that baseline ambient noise conditions have been reconstructed using accepted noise modelling methods consistent with applicable ISO standards. |
| 4.4.2.1. | If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00 (i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are | ◐ | The evidence reviewed includes the Assessment of Unki Activities Impact on Community - Noise Survey Report (Anglo American, May 2022) and the Q3 2025 Environmental Noise Monitoring Report (Valterra Platinum, August 2025), which document measured ambient and operational noise levels at offsite residential receptors located approximately 0.6 km to 5.5 km from the mine.<br>The 2022 Noise Survey Report documents daytime noise measurements taken in nearby communities and on-site camps located 600 m to 5 km from the mine, as well as along transportation routes during both traffic and no-traffic periods. Measured daytime noise levels ranged from 38.6–55.5 dB(A) without traffic and 47.1–56.5 dB(A) with traffic. The report notes that no distinguishable noise from mining activities was detected in communities and that the observed exceedances were attributed to non-mining sources, such as children playing. In the one (1) |

| Req # | Requirement | Score | Basis for Rating |
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| | necessary and/or appropriate because of local, cultural or social norms. | | community, where daytime noise exceeded 55 dB(A) without traffic, the contribution from mining-related traffic did not increase noise levels by more than 3 dB(A) and was, in fact, lower at 51.5 dB(A) due to the absence of external noise sources. The Q3 2025 Environmental Noise Monitoring Report (Valterra Platinum, August 2025) documents day- and night-time equivalent continuous sound level (LAeq) measurements at offsite residential noise receptors, including NS1 (Nyati Camp), NS2 (Mbada), and the community areas of NS7 and NS9. Reported daytime LAeq values ranged from 43.4 to 49 dB(A), while nighttime LAeq values ranged from 47.0 to 55.9 dB(A). Monitoring was conducted using day and night periods of 06:00–22:00 and 22:00–06:00, respectively.<br><br>The evidence indicates that the company has conducted noise monitoring at the nearest offsite residential receptors, with daytime noise levels generally remaining below the IRMA limit of 55 dBA, and where exceedances are identified, they are attributed to non-mining activities.<br><br>The evidence does not include sufficient information to confirm whether nighttime exceedances (>45 dBA) are attributable to mining-related activities or to external noise sources and therefore does not demonstrate that mining-related noise complies with the IRMA nighttime limit at the nearest offsite receptor. In addition, no rationale is provided to demonstrate that alternative monitoring times starting at 6 AM rather than 7 AM are necessary or appropriate due to local, cultural, or social norms. |
| 4.4.2.2. | The following exceptions to 4.4.2.1 apply: | ◐ | The evidence reviewed includes the Assessment of Unki Activities Impact on Community - Noise Survey Report (Anglo American, May 2022) and the Q3 2025 Environmental Noise Monitoring Report |

| Req # | Requirement | Score | Basis for Rating |
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| | 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<br><br>b. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met. | | (Valterra Platinum, August 2025), which document measured ambient noise levels at offsite homesteads located 0.6 km to 5.5 km from the mine.<br><br>a. The 2022 Noise Survey Report and 2025 Noise Monitoring Report indicate that daytime noise generally remains below the 55 dB(A) threshold, and that measured exceedances are attributable to non-mining sources (see 4.4.2.1). Night-time equivalent continuous sound levels (LAeq) were recorded at offsite residential receptors, with values ranging from 47.0–55.9 dB(A) in the 2023 Noise Monitoring Report.<br><br>b. Four Blast-Induced Vibration Monitoring Reports for the TSF Extension Project Blasts 1, 2, 3, and 4 (Optimal Blasting Solutions, June to August 2025), as well as a sample of Surface Blasting Notifications (Valterra Platinum, June to August 2025) indicate that during periods of blasting, the company meets the requirements 4.4.2.4 (b) and (c) with respect to blasting schedules and ground vibration limits.<br><br>The evidence indicates that mine-related noise does not contribute to more than 3 dBA above the baseline during the day (a), and that sub-requirement (b) is fully met.<br><br>The evidence does not include documentation to confirm that mining-related noise contributions do not exceed 3 dB(A) above the baseline at night. |
| 4.4.2.3. | If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from | — | Not relevant. Screening has identified more sensitive noise receptors than industrial or commercial receptors that may be affected by mining-related noise (see requirement 4.4.1.2). |

| Req # | Requirement | Score | Basis for Rating |
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| | mining-related activities, then noise measured at the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA. | | |
| 4.4.2.4. | If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows:<br><br>a. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period;<br><br>b. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and<br><br>c. 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. | | The evidence reviewed includes four (4) Blast-Induced Vibration Monitoring Reports for the TSF Extension Project Blasts 1, 2, 3, and 4 (Optimal Blasting Solutions, June to August 2025), as well as a sample of Surface Blasting Notifications (Valterra Platinum, June to August 2025). The documents indicate that:<br><br>a. Airblast overpressure was recorded only for Blast 4, indicating a range of 108-116 dB.<br><br>b. Blasting is conducted between the hours of 14:00 and 15:00 on normal working days.<br><br>c. Peak particle velocity (PPV) measurements for Blasts 1-4 ranged from 1 to 4 mm/s.<br><br>Interviews with relevant staff indicate that blasting is conducted irregularly on an as-needed basis for projects, such as the bulk sampling activities in 2023 and TSF wall raises, which require the blasting of nearby pits to retrieve construction material.<br><br>The evidence indicates that the blasts are largely conducted in alignment with sub-requirements (a) through (c).<br><br>The evidence does not demonstrate systematic measurement and documentation of airblast overpressure across blasting events, even when blasting is undertaken irregularly, sufficient to confirm consistent compliance with sub-requirement (a). |

| Req # | Requirement | Score | Basis for Rating |
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| 4.4.2.5. | 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:<br>a. There are no nearby human noise receptors that will be impacted by blasting noise or vibration;<br>b. Alternative hours are necessary and/or appropriate because of local, cultural or social norms; and/or<br>c. Potentially affected human receptors have given voluntary approval for the expanded blasting hours. | — | Not relevant. The evidence reviewed includes four (4) Blast-Induced Vibration Monitoring Reports for the TSF Extension Project Blasts 1, 2, 3, and 4 (Optimal Blasting Solutions, June to August 2025), as well as a sample of Surface Blasting Notifications (Valterra Platinum, June to August 2025), which document that blasting is scheduled between 14:00 and 15:00.<br>Interviews with relevant staff and communities confirm that blasting at the Unki mine occurs within 09:00 to 17:00, on traditionally normal working).<br>The evidence, supported by interviews, indicates that blasting occurs during normal working hours and that the company meets requirement 4.4.2.4 (b). |
| 4.4.2.6. | If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the operating company shall consult with affected stakeholders to develop mitigation 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. | ● | The evidence reviewed includes the Unki Grievance & Incident Registers (2023 - 2025), which document four (4) complaints from Dzikamidzi community members relating to blasting noise and alleged structural cracking of houses following the first blast associated with the bulk sampling project on September 28, 2023. Meeting minutes with Dzikamidzi Committee Members (Unki Mines, October 9, 2023) demonstrate that the company consulted with affected stakeholders to investigate these complaints. In response to the complaints, the company installed vibration monitors at residences with alleged damage, conducted baseline and post-blast condition assessments in the presence of community members, shared vibration monitoring results, and undertook dust and noise monitoring. The company also reduced |

| Req # | Requirement | Score | Basis for Rating |
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| | | | explosive charges for subsequent blasts after determining that the rock mass was less competent than anticipated. Documentation reviewed indicates that six (6) blasts were conducted for the bulk sampling project before blasting activities ceased at the end of 2023. Investigation records conclude that the reported structural cracks were not attributable to blasting activities and that the reduction of explosives resolved remaining concerns. Supplemental evidence indicates that the Grievance Procedure (Anglo American, February 2024) outlines processes for recording, investigating, responding to complaints, and consulting with stakeholders, including escalation where impacts are substantiated.<br><br>Interviews with community members in Chironde indicated perceptions of ongoing noise disturbance, which had not been submitted through the company's formal grievance mechanism, and therefore do not constitute a complaint made to the operating company as defined in this requirement. Company representatives reported that noise monitoring conducted closer to the mine site shows levels below permitted limits and that noise is expected to diminish with distance.<br><br>The evidence, supported by interviews, indicates that when credible complaints are raised through the company’s grievance mechanisms, the company responds to and consults with affected stakeholders and implements investigation and mitigation measures, as demonstrated by the response to blasting-related complaints from Dzikamidzi community members, including stakeholder consultations, installation of vibration monitors, and adjustment of explosive charges. |

| Req # | Requirement | Score | Basis for Rating |
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| 4.4.2.7. | All noise- and vibration-related complaints and their outcomes shall be documented. | ● | The evidence reviewed includes the Unki Grievance & Incident Registers (2023 - 2025), which document four (4) noise and vibration-related complaints submitted by Dzikamidzi community members following the first bulk sampling blast on September 28, 2023. The register records key information for each complaint, including dates, complainant details, descriptions of the issues raised, investigation actions, outcomes, and closure status. Supporting evidence includes meeting minutes with Dzikamidzi Committee Members (Unki Mines, October 9, 2023), which document stakeholder consultation undertaken as part of the complaint investigations, as well as a presentation on the Unki South Open Pit Project Update (Anglo American, December 2023), which indicates that monitoring results, investigation outcomes, and planned future monitoring activities were communicated to the community. Supplemental evidence indicates that the Grievance Procedure (Anglo American, February 2024) outlines processes for recording, investigating, responding to complaints, and consulting with stakeholders, including the escalation of cases where impacts are substantiated.<br><br>The evidence indicates that the company documents noise and vibration-related complaints that are raised through the grievance mechanisms and their outcomes, including investigation notes and closure status. |
| 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 | ● | The evidence reviewed includes the Unki Grievance & Incident Registers (2023 - 2025), which documents four (4) noise- and vibration-related complaints submitted by Dzikamidzi community members following the first bulk sampling blast on September 28, 2023. In response to the grievances, the company conducted |

| Req # | Requirement | Score | Basis for Rating |
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| | shall be made available to stakeholders upon request. | | baseline and post-blast condition assessments in the presence of community members, shared vibration, noise, and dust monitoring data as documented in a presentation to the community (Unki South Open Pit Project Update, Anglo American, December 2023).<br>The Unki Safety, Health and Environment (SHE) Policy (Unki Mines, July 2025) commits the company to making safety, health, and environmental information available to interested parties upon request.<br>Interviews with company staff indicate that monitoring data is made available upon request or following investigations of noise- and vibration-related complaints.<br>The evidence, supported by interviews, indicates that the company provides noise data and information to stakeholders in response to complaints and has a mechanism in place to make such information available upon request. |

## Chapter 4.5—Greenhouse Gas Emissions

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 100% |
| Chapter Score Basis | 14 out of 14 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 4.5.1.1. | Critical. The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:<br><br>a. Identifying and measuring greenhouse gas emissions from the mining project,<br><br>b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project,<br><br>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<br><br>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. | ● | The evidence reviewed includes a Group Policy on Climate Change (Anglo American, December 2024) and the Energy & Greenhouse Gas (E&GHG) Emissions Management Standard (Anglo American, December 2023). Collectively, these documents outline the corporate high-level approach to managing climate-related risks, including greenhouse gas (GHG) emissions. They also establish a commitment by the company to:<br><br>a. Identify and quantify GHG emissions from the mining project, as the Group is committed to disclosing Scope 1 and Scope 2 emissions in accordance with a defined methodology, as outlined in the Climate Change Policy and the E&GHG Emissions Management Standard.<br><br>b. Identifying energy efficiency and GHG reduction opportunities across the mining project, as supported by the Climate Change Policy and the E&GHG Emissions Management Standard.<br><br>c. Setting meaningful and achievable targets for reductions in absolute GHG emissions on a corporate-wide basis through operational decarbonization (reducing Scope 1 and 2 GHG emissions) to achieve carbon neutrality (aligned with the current best-practice definition of net zero), and decarbonizing value chains (Scope 3 emissions) by engaging and partnering with customers and suppliers, as stated in the Climate Change Policy and further reinforced by the E&GHG Emissions Management Standard.<br><br>d. Reviewing its operational emission reduction targets every five (5) years, or when material changes occur in the portfolio, or as specified in the GHG Protocol, as outlined in the Climate Change Policy. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Interviews with relevant staff confirm that, despite Anglo American’s demerger and the transfer of ownership to Valterra Platinum, Anglo American's policy remains in effect until the current operator replaces it.<br><br>The evidence, supported by interviews, indicates that the company has a corporate-level policy regarding the reduction of GHG emissions that fully aligns with sub-requirements (a) through (c), and meets the intent of sub-requirement (d). |
| 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. | ● | The evidence reviewed includes the Energy & Greenhouse Gas (GHG) Emission Management Standard (Anglo American, December 2023), which mandates that the methodologies used for reporting, inventory, and forecasting of GHGs align with the GHG Protocol Corporate Standard (GHG Protocol).<br><br>Additional evidence is provided by the GHG Emissions Calculation Methodology document (Anglo American, 2024), which provides reference to the use of the GHG Protocol Scope 2 Guidance, and the Scope 3 Guidance and Standard. Furthermore, it cites the Intergovernmental Panel on Climate Change (IPCC) Guidelines for National GHG Inventories and the International Standard ISO 14064-1 as reference materials in determining GHG emissions.<br><br>Further evidence includes the 2024 Sustainability Report (Anglo American, 2024) and the 2024 Sustainability Report (Anglo American, 2024), which disclose emissions quantifications for carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride ($SF_6$). |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Interviews with relevant staff indicate that $NF_3$ emissions are not considered material because the company's operations do not involve processes that emit $NF_3$ at meaningful levels.<br><br>The evidence, supported by interviews, indicates that the company's GHG emissions quantification is obtained using methods aligned with widely accepted reporting standards. |
| 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. | ● | The evidence reviewed includes a site-level Decarbonisation Baseline & Roadmap (Anglo American, July 2024), which outlines site-specific targets for Scope 1 & 2 net greenhouse gas (GHG) emissions reductions. It presents the Roadmap to Carbon Neutrality through a series of milestones related to renewable electricity, coal and diesel conversion, energy storage, and carbon offsets. It also mentions ongoing actions to support these targets, including the Unki Solar PV Program and initiatives to secure short-term electricity supply for the mine over the next three (3) to five (5) years.<br><br>Additional supporting evidence includes the 2023 Unki Portfolio (Anglo American, June 2023), which presents projections of energy consumption, energy intensity, and emission reductions based on an alternative energy strategy, and an excerpt from the 2025 Unki – GHG Roadmap (Valterra Platinum, October 2025), which includes updated projections for Scope 1 and Scope 2 GHG emissions.<br><br>Interviews with relevant staff confirm that, despite Anglo American's demerger and the transfer of ownership to Valterra Platinum, the site maintains Anglo American's GHG-related targets and plans for the year 2030. GHG reduction plans beyond 2030 are currently being developed. |

| Req # | Requirement | Score | Basis for Rating |
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| | | | The evidence, supported by interviews, indicates that the GHG-related policy is underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy. |
| 4.5.3.2. | The operating company shall demonstrate progress toward its greenhouse gas reduction targets. | ● | The evidence reviewed includes a site-level Decarbonisation Baseline & Roadmap (Anglo American, July 2024), which presents the site's actual and projected Scope 1 and 2 greenhouse gas (GHG) emissions performance from 2016 to 2040. A graph within the presentation illustrates a projected downward emissions trendline aligned with the reduction target for 2030 and the decarbonisation goal for 2040. The 2024 Roadmap reports progress on the development of a 35 MW Solar Photovoltaic (Solar PV) facility at the site, which is part of the company's strategy to meet its GHG emissions targets.<br><br>Additional supporting evidence includes an excerpt from the 2025 Unki – GHG Roadmap (Valterra Platinum, October 2025), and the 2025 Performance Tracking worksheet (no author, 2025), which include updated projections based on continual data monitoring to track progress toward emission reduction targets.<br><br>Interviews with relevant staff indicate that there have been no measurable reductions in GHG emissions due to increased mineral production in recent years, and that construction of the solar photovoltaic plant has commenced.<br><br>The evidence, supported by interviews, indicates that there are no measurable reductions yet, but that implementation of measures to reduce greenhouse gas emissions is underway, such as advancements in the 35 MW solar energy project. |

| Req # | Requirement | Score | Basis for Rating |
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| 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. | ● | The evidence reviewed includes a Conceptual Study on Future Alternative Energy Supply Options for Anglo American Platinum's Operational Complexes in Southern Africa (CSIR, January 2021), which assesses energy scenarios for prioritized operations, including the Unki Mine, and identifies options such as solar PV, wind, battery storage, and hydrogen technologies to reduce GHG emissions.<br><br>Additional evidence includes the site's Decarbonisation Baseline & Roadmap (Anglo American, July 2024), which lists technology solutions (e.g., electrification and biofuels for diesel used in mobility) for projected GHG emission reductions. It also highlights progress on the site's 35 MW solar PV facility project, the environmental and social impacts of which were assessed in the Solar PV ESIA (SLR Group, June 2023).<br><br>Interviews with relevant staff indicated that the 2021 Conceptual Study provided the foundation for the company's future initiatives related to energy and GHG emission reduction. They also stated that the feasibility study of any planned project includes a GHG study.<br><br>The evidence, supported by interviews with relevant staff, indicates that the company has explored GHG reduction strategies and scenarios and documented the results of these investigations. |
| 4.5.4.1. | The greenhouse gas policy shall be publicly available. | ● | The evidence reviewed includes a Group Policy on Climate Change (Anglo American, 2024), available in English on the company's webpage (https://www.angloamerican.com/~/media/Files/A/Anglo-American-Group-v9/PLC/sustainability/approach-and-policies/environment/climate-change-policy-2024.pdf). Additional evidence includes the Safety, Health and Environmental |

| Req # | Requirement | Score | Basis for Rating |
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| | | | Management (SHE) Policy (Valterra Platinum, July 2025), which references the management of physical climate change and the efficient use of energy, includes the company's commitment to make the SHE Policy and supporting information available to any interested party upon request.<br>Interviews with relevant staff confirm that, despite Anglo American's demerger and the transfer of ownership to Valterra Platinum, Anglo American's policy remains in effect until the current operator replaces it.<br>The evidence, supported by interviews, indicates that the climate change policy, which addresses GHG emissions-related matters, is publicly available through the company's website. |
| 4.5.4.2. | On an annual basis, the operating company or its corporate owner shall:<br>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<br>(Note: sub-requirement 4.5.4.2.a is not included in the self-assessment rating). | ● | The evidence reviewed includes a site-level Decarbonisation Baseline & Roadmap (Anglo American, July 2024), the 2025 Performance Tracking worksheet (no author, 2025), and the Sustainability Report (Anglo American Platinum, 2024), and indicates that the company:<br>a. Discloses to IRMA auditors an accounting of its Scope 1 and 2 greenhouse gas emissions (GHG), as well as information on progress and efforts to reduce them, as supported by the Baseline & Roadmap (Anglo American, July 2024), and the 2025 Performance Tracking worksheet.<br>b. Publishes corporate-level reporting on GHG emissions, including progress and efforts made toward emission reduction targets, as supported by the Sustainability Report (Anglo American Platinum, 2024), which is available on the Valterra Platinum website (accessible at: |

| Req # | Requirement | Score | Basis for Rating |
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| | 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. | | https://www.valterraplatinum.com/~/media/Files/V/Valterra-Platinum/Platinum/report-archive/2024/sustainability-report-2024.pdf).<br>The evidence indicates that the company shares information on its GHG emissions and reduction measures in alignment with sub-requirements (a) and (b). |

## Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

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| Chapter Relevant? | Yes |
| Overall Chapter Score | 73% |
| Chapter Score Basis | 19 out of 26 possible points |

| Req # | Requirement | Score | Basis for Rating |
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| 4.6.1.1. | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | ● | The evidence reviewed includes a Biodiversity Specialist Report (Black Crystal, February 2023) associated with the Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023). This assessment involved a team of zoologists, ecologists, biologists, and environmental scientists, including a terrestrial and wetland ecologist with over 20 years of professional experience.<br>A Wetland Rehabilitation Plan (Nhiwatiwa, February 2024) was prepared by a fisheries biologist (freshwater and marine) with over |

| Req # | Requirement | Score | Basis for Rating |
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| | | | 15 years of professional experience. The Biodiversity Offset Management Plan for Miombo Woodland at Unki Platinum Mine (Zimudzi, February 2024) was prepared by a biodiversity specialist with over 30 years of professional experience. The Environmental DNA Monitoring Report on freshwater vertebrates (Nature Metrics, 2024) was conducted by a freshwater zoologist with over 16 years of professional experience.<br><br>The Specialist Report and Management Plan for an Aloe and Orchid Species Rescue Operation for a Solar Plant Project at Unki Mine (Black Crystal Consulting, March 2025) was prepared by a terrestrial ecologist and a plant ecologist with 7 and 20 years of professional experience, respectively. The Biomonitoring Report for sampling undertaken between May 26–30, 2025 (Scientific and Aquatic Services, June 2025) was conducted by an ecologist, zoologist, aquatic ecologist, and environmental scientist (the latter with a background in zoology and biochemistry) with over 20, 20, 13, and 12 years of professional experience, respectively.<br><br>Other key biodiversity studies include the Rehabilitation Planning: 5-Year Rolling Rehabilitation Plan (Anglo American, December 2023), Proximity Report: Unki 2024 Biodiversity Update (Human, August 2024), Integrated Biodiversity Assessment Tool (IBAT) Screening (Human, August 2024), IBAT – Freshwater (Human, August 2024), and IBAT – Species Threat Abatement and Restoration (Human, August 2024) and the CV of the author, a key mine staff member, listing relevant qualifications and experience in conservation, rehabilitation, and biodiversity assessments.<br><br>An interview with relevant company staff indicates that the national and international experts were competent to conduct the |

| Req # | Requirement | Score | Basis for Rating |
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| | | | biodiversity assessments, using internationally recognized methodologies vetted by the international experts.<br>The evidence, supported by interviews, indicates that some of the company's biodiversity, ecosystem services, and protected areas screening, assessment, management planning, and monitoring were conducted by qualified professionals using accepted methodologies. Their expertise and competency are validated through a review of professional education and prior work experience. |
| 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. | ● | The evidence reviewed includes a Biodiversity Standard (Anglo American, December 2023), a Biodiversity Guideline (Anglo American, January 2024), and a Biodiversity Strategy (Valterra Platinum, 2025), all of which commit to consulting with internal and external experts and/or relevant stakeholders on biodiversity, ecosystem services, and protected areas, among other aspects. The Proximity Report - Unki 2024 Biodiversity Update (Human, August 2024) documents nearby protected areas and concludes that the mine is not located in a legally protected area. The Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023) indicates that stakeholder consultations including on biodiversity, ecosystem services and protected areas, were conducted with local authorities, traditional leaders, government departments, and local communities from Masasa-Gutsa, Dzikamidzi, Adare Farm, Gutsaruzhinji, Makwikwi, Hwinya, and nearby villages, as captured in the associated Stakeholder Engagement Summary Report (SLR Consulting, June 2023). |

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| | | | Consultations conducted as part of the 2023 ESIA for the Solar Photovoltaic Facility included local authorities, traditional leaders, and communities from surrounding villages, as documented in the Stakeholder Engagement Summary Report.<br><br>Interviews with relevant company experts indicate that communities and government officials have been involved in determining monitoring locations, have provided input on their selection, and have participated in monitoring activities. Interviews with communities indicate interest in protecting and enhancing aquatic resources that provide water for grazing, but limited interest in forest conservation.<br><br>The evidence, supported by interviews, indicates that biodiversity, ecosystem services, and protected areas screening, assessment, management planning, and the development of mitigation actions included consultations with stakeholders, including, where relevant, affected communities and external experts, as demonstrated through consultations conducted for the 2023 ESIA and community participation in biodiversity monitoring activities. |
| 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. | ● | The evidence reviewed includes the Safety, Health and Environment (SHE) Management Policy (Valterra Platinum, July 2025), which states that the policy and supporting SHE information will be made available to interested parties upon request. Photographs documenting public posting of the SHE Policy show that it is displayed in publicly accessible locations, including a local clinic and a government office.<br><br>Additional evidence includes the Biodiversity Strategy (Valterra Platinum, 2025), which identifies communication on implemented |

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| | | | biodiversity programs as a success indicator and commits to disclosing biodiversity performance using the Endangered Wildlife Trust's Biological Diversity Protocol, a tool developed by the Endangered Wildlife Trust to enable businesses to measure, account for, and report their positive and negative impacts on biodiversity.<br><br>The Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023) demonstrates that, in line with Zimbabwe's Environmental Management Act (Cap 20:27) and the Environmental Management (Environmental Impact Assessment and Ecosystems Protection) Regulations, SI No. 7 of 2007, which make public disclosure of EIAs mandatory, the company made the ESIA (2023) publicly available in both English and Shona. This included the results of the associated Critical Habitat Assessment (SLR Consulting, October 2022), Biodiversity Specialist Report (Black Crystal Consulting, February 2023), and Wet Season Biodiversity Report (Black Crystal Consulting, February 2023). These documents were disclosed on the SLR website, and the ESIA Non-Technical Summary was made available at strategic locations in and around Unki Mine, including the Tongogara Rural District Council offices, Chachacha TRDC sub-office, Shurugwi Town Council offices, the District Development Coordinator's Office, Chironde Clinic, Unki Mine, and the Impali housing office, during a 30-day public disclosure period from May 11, 2023 to June 12, 2023. A public meeting was also held at the mine in May 2023, during which a presentation on the ESIA (2023) was delivered and copies of the Non-Technical Summary were distributed to attendees.<br><br>Public disclosure was supported by notifications in national newspapers, messages sent via SMS or WhatsApp to phone |

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| | | | numbers available, and notification letters distributed via email, with the Non-Technical Summary attached, to stakeholders registered in the project database. Notices were also displayed on boards placed at strategic locations, including the entrance to Unki Mine, the Ministry of Mines and Mining Development Regional Office, and Chironde Rural Business Centre. Evidence of these notifications is documented in the ESIA (2023) Stakeholder Engagement Summary Report (SLR Consulting, June 2023).<br><br>Further evidence reviewed includes the Grievance Procedure (Anglo American, February 2024) and the Grievance Register for Q1–Q3 2025 (Unki Mine, 2025), which do not record any stakeholder requests related to access to, or disclosure of, biodiversity, ecosystem services, or protected areas impact assessments during the period assessed.<br><br>Interviews with relevant experts confirmed that biodiversity studies are available online and that the mine has a policy of providing information upon request. Interviews with community members did not indicate any requests for biodiversity monitoring data.<br><br>The evidence, supported by interviews, indicates that the company has made biodiversity, ecosystem services, and protected areas impact assessments publicly available on the company website and would provide such information upon request. |
| 4.6.2.1. | Critical. New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services | ◕ | The evidence reviewed includes a corporate-level Biodiversity Standard (Anglo American, 2023) that outlines screening requirements and mandates the identification of biodiversity impacts for new or modified projects. Additional evidence includes an initial Environmental Impact Assessment (EIA) (Scott Wilson, |

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| | and protected areas from past and proposed mining-related activities. | | 2003) for the mine operation, consolidating assessments of potential impacts conducted between 1995 and 2002. Since then, the company has conducted additional EIAs for project expansions and additions to identify potential impacts during planning, construction, operational, and, in some cases, rehabilitation phases, as documented in:<br><br>- EIA for an Overhead Power Supply Line (Mkola Investments, 2013), which assessed potential impacts on vegetation, wildlife, and hydrology.<br><br>- EIA for a Smelter (Ascon Africa, 2016), which assessed potential impacts on visual aesthetics/landscape, soils, surface and groundwater, air, flora and fauna, noise and vibrations.<br><br>- EIA for a Waste Incinerator Project (Black Crystal, 2020), which assessed impacts on air, soil, water, and biodiversity.<br><br>- EIA for South Bulk Sample Collection (Black Crystal, 2021), which assessed impacts on visual aesthetic values and landscape, vegetation, soils, and air.<br><br>- Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, 2023), supported by associated Critical Habitat Assessment, Biodiversity Specialist Report, and Specialist Wet Season Biodiversity Report (Black Crystal, 2022-2023), which assessed potential impacts on vegetation, wetlands, habitats (including natural, modified and critical habitats), fungi, and fauna (avifauna, mammals, herpetofauna, amphibians).<br><br>Complementary studies, including a Biodiversity and Ecosystem Services Baseline Gap Analysis (no author, 2019), the Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., |

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| | | | 2020), the Operational Guideline for the TSF Failure Scenario (Anglo American, 2025), and the Biomonitoring Report of Aquatic Resources (Scientific Aquatic Services, 2025), provide updated biodiversity and ecosystem services baseline data and identify significant biodiversity features.<br><br>Stakeholder consultations on biodiversity, ecosystem services, and protected area impacts were conducted during several environmental assessments, such as the 2013 and 2016 EIAs, that involved consultations with local communities, government administrators, and stakeholders, including farmers, local councils, and other nearby institutions. The 2020 Biodiversity Baseline and Ecosystem Services Assessment included a focus group of 26 participants from six (6) surrounding villages (Makwikwi, Villages 4, 5, 6, and 17, and Chironde) who discussed biodiversity use, preservation, and ecosystem services. The 2021 Bulk Sample Collection ESIA included input from the Dzikamidzi Village Committee. During the 2023 Solar Photovoltaic Facility ESIA, the company engaged local authorities, traditional leaders, and communities from Masasa, Dzikamidzi, Adare Farm, Gutsaruzhinji, Makwikwi, Hwinya, and nearby villages.<br><br>Relevant staff indicated that the company began a process in 2020 to identify gaps in biodiversity assessments, involving local experts (University of Zimbabwe, Zimbabwe Parks and Wildlife Management Authority) and international experts (Flora & Fauna International, SAS Environmental, Endangered Wildlife Trust). The baseline scope was expanded to include ecosystem services, critical habitat, and wildlife corridors. Environmental DNA (EDNA) was incorporated into the methodology to improve the identification of aquatic organisms in water bodies. These studies provided |

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| | | | additional screening-level biodiversity data used to enhance and focus biodiversity monitoring, improving understanding and management of high-value biodiversity elements affected by current mine activities and heritage impacts, such as abandoned chromite mining within the concession.<br><br>Field visits were conducted to critical habitat and restoration areas included in these expanded biodiversity assessments, including restored chromite mines along wildlife corridors, a constructed wetland system downstream of the RWD (Return Water Dam), riparian zones along the Mutevekwi and Mutevekwana Rivers, and the Tailings Storage Facility (TSF).<br><br>The evidence, supported by interviews and on-site observations, indicates that the company has conducted expanded screening to improve its understanding of the impacts of past and proposed mining activities on biodiversity and ecosystem services. The studies were conducted by qualified professionals. Local authorities were consulted on the expanded data collection, and community members helped identify appropriate study locations and participated in data collection.<br><br>The evidence does not include details confirming that the company has adequately screened for biodiversity, critical habitat, wildlife corridors and ecosystem services along the Dwimbika River, downstream of the Lucilia Poort Dam (constructed in the early to mid-2000s). |
| 4.6.2.2. | Screening shall include identification and documentation of: | ● | The evidence reviewed includes the Biodiversity Baseline and Ecosystem Services Assessment Final Report (Nhiwatiwa et al., September 2020), which identifies areas of modified and natural |

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| | 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;<br><br>b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values;<br><br>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<br><br>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. | | habitat within the mine's proposed or actual area of influence. It also includes the Important Bird Area – Biodiversity Value Assessment Report and Biodiversity Overlay Assessment Tool (BOAT) mapping (Nhiwatiwa et al., October 2020), which identifies natural ecosystems and ecological processes providing provisioning, regulating, and cultural ecosystem services within the mine's proposed or actual area of influence.<br><br>Within the mining lease area and its surrounding 5 km buffer zone, the studies identified six (6) specially protected plant species in Zimbabwe and 24 migratory bird species, including intra-African and Palearctic migrants. One (1) of these species is classified as Vulnerable by the International Union for Conservation of Nature. In addition, three (3) other non-migratory bird species, two (2) terrestrial animal species, and one (1) critically endangered fish species were recorded.<br><br>A Critical Habitat Assessment for the Unki Solar PV Project (SLR Consulting, February 2023) evaluates the presence of Critical Habitat in line with IFC Performance Standard 6 criteria and further identifies natural ecosystems and processes providing ecosystem services within the mine's area of influence, including supporting services such as the Gabbronorite grasslands of the Great Dyke, where a concentration of plant endemics is likely to occur.<br><br>Further evidence includes the Proximity Report – Unki 2024 Biodiversity Update (Human, August 2024), which uses the Integrated Biodiversity Assessment Tool (IBAT) to map and identify legally protected areas within 5 km, 10 km, and 50 km buffer zones of the mine. The Unki Biodiversity Update: IBAT Screening (Human, |

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| | | | August 2024) also maps and identifies all Key Biodiversity Areas and Critical Habitats within 1 km, 10 km, and 50 km radii of the mine.<br><br>The evidence indicates that:<br><br>a. There are no legally protected areas within the mine's actual or proposed area of influence, with the closest being the Midlands Black Rhino Conservancy located within a 50 km buffer zone.<br><br>b. There are no Key Biodiversity Areas within the mine's area of influence; the nearest Key Biodiversity Area is Wabai Hill (Debshan Ranch), located approximately 50 km away. However, the mine is situated within a 10 km radius of the Driefontein Grasslands, which is designated as an Important Bird Area and is relatively small in extent.<br><br>c. Areas of modified and natural habitat have been identified within the mine's area of influence and include Miombo woodland, Combretum-Terminalia woodland, serpentine vegetation, riverine ecosystems, cultivated fields, open grasslands, and Acacia woodland. The assessments conclude that there are no Critical Habitats within the mine's actual or proposed area of influence.<br><br>d. Natural ecosystems and processes within the mine's area of influence provide or may provide ecosystem services (e.g., wild food harvesting, fruits, honey, fish, livestock grazing, construction materials, and firewood); regulating services (e.g., climate regulation, streamflow augmentation, erosion control, sediment trapping, air purification, oxygen production through photosynthesis, and carbon sequestration); cultural services (e.g., sacred site for traditional rituals and religious gatherings); and |

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| | | | supporting services, including the Gabbronorite grasslands of the Great Dyke, where plant endemism is likely to occur.<br><br>The evidence indicates that the company's screening includes the information in sub-requirements (a) through (d). |
| 4.6.3.1. | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>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;<br><br>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; | ● | The evidence reviewed includes the Biodiversity Standard (Anglo American, December 2023) and the associated Biodiversity Guideline (Anglo American, January 2024), which require that mines established prior to 2018 compensate for pre-2018 disturbances through enhancements to existing offsets or restoration measures, or through additional conservation actions. It also includes the Biodiversity Strategy (Valterra Platinum, 2025), which commits to forming partnerships for technical guidance, biodiversity footprinting, disclosure support, alignment with national biodiversity targets and data integration, implementation of community-based conservation and restoration initiatives, and research on species recovery and ecological resilience.<br><br>Supporting documentation demonstrates that the company has undertaken the following:<br><br>a. Established biodiversity and ecosystem services baseline conditions for the Unki mine claim area and broader area of influence through multiple EIAs and specialist studies, including the Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023) and associated specialist reports, as well as complementary biodiversity baseline and IBAT screening studies (2020–2024) (see 4.6.2.1).<br><br>b. Identified potentially significant direct and indirect impacts (as assessed in the 2003, 2013, 2016, 2020, 2021 and 2023 EIAs) and |


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| | c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>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. | | cumulative impacts (as assessed in the 2016, 2020 and 2023 EIAs) on biodiversity and ecosystem services associated with past and proposed mining activities (see 4.6.2.1).<br><br>c. Considered alternatives and evaluated avoidance, restoration and offset measures. The 2003, 2013, 2016, 2020 and 2023 EIAs assessed alternative sites, with lower-impact options selected. The 2023 ESIA revised the project boundary and transmission corridor for the proposed 30–50 MW Solar PV Facility to avoid highly sensitive or 'no-go' areas identified by biodiversity, wetland and social specialists, and respected recommended buffer zones. Restoration opportunities are identified in the Vegetation Condition and Habitat Connectivity Assessment (Flora and Fauna International, January 2025). The Rehabilitation Planning: 5-Year Rolling Rehabilitation Plan (Anglo American, 2023), Wetland Rehabilitation Plan (Nhiwatiwa, 2024), Biodiversity Offset Management Plan for Miombo Woodland (No Author, 2024), and the Specialist Report and Management Plan for an Aloe and Orchid Species Rescue Operation for the Solar Plant Project (Black Crystal, March 2025) provide a framework for restoration and additional conservation actions to enhance important biodiversity values and priority ecosystem services.<br><br>d. Identified and evaluated partnership opportunities to support biodiversity management. The Environmental and Social Management Plan associated with the 2023 ESIA recommends collaboration with the National Herbarium, Parks and Wildlife Management Authority, Aloe Society of Zimbabwe, Forestry Commission, and Veterinarians for Animal Welfare Zimbabwe in the development and implementation of plant and animal rescue plans. The Biodiversity Offset Management Plan for Miombo |

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| | | | Woodland (C. Zimundzi, 2024) recommends collaboration with stakeholders such as BirdLife and Animal Welfare Zimbabwe, local community authorities and the police, and identifies additional conservation actions, including Miombo woodland regeneration strategies such as environmental education programmes, coordinated coppicing, controlled burning, proactive weed control and Non-Timber Forest Products management.<br><br>An interview with the District Environmental Officer of the Environmental Management Agency in Shurugwi indicated that important biodiversity values and priority ecosystem services have been identified, and evaluation of options to provide restoration for potential and actual impacts in the recent EIAs for Unki expansion has evaluated and approved. An interview with a representative of the Forestry Commission of Shurugwi indicated that there has been bi-annual support and coordination with the Unki Mine on reforestation projects.<br><br>The evidence, supported by interviews, indicates that the company fully meets sub-requirements (a) through (d). |
| 4.6.4.1. | Critical. Mitigation measures for new mines shall:<br><br>a. Follow the mitigation hierarchy of:<br><br>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them; | — | Not Relevant. Unki is an existing mine. |

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| | ii. Where impacts are not avoidable, minimizing impacts to the extent possible;<br>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and<br>iv. As a last resort, offsetting the residual impacts.<br>b. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process;<br>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. | | |
| 4.6.4.2. | At existing mines:<br>a. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement onsite | ◕ | The evidence reviewed includes the Biodiversity Standard (Anglo American, December 2023) and the associated Biodiversity Guideline (Anglo American, January 2024), which require that existing mines established prior to 2018, such as Unki, revisit and reapply the initial steps of the mitigation hierarchy before designing and implementing biodiversity offsets, regional ecological restoration strategies, additional conservation actions (ACAs), or |

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| | 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<br><br>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. | | other measures. These actions are intended to ecologically compensate for unmitigated historical disturbances to Significant Biodiversity Features (SBFs) from Anglo American ownership prior to 1 January 2018, with ACAs required regardless of whether the SBFs were directly impacted by Anglo American activities.<br><br>The Biodiversity Strategy (Valterra Platinum, 2025) identifies Biodiversity Net Gain (BNG) or No Net Loss (NNL) as a key success indicator. The Biodiversity Specialist Report (Black Crystal Consulting, February 2023), associated with the ESIA for a Solar Photovoltaic Facility (SLR Consulting, June 2023), notes that vegetation clearing for the solar PV site would cause unavoidable, largely irreversible impacts on slow-growing, long-lived Miombo trees, making immediate restoration impractical over the anticipated 25–30-year lifespan of the project. The report also highlights impacts on sensitive habitats such as wetlands and streams within the project area.<br><br>The Solar PV Facility Stakeholder Engagement Summary (SLR Consulting, June 2023) documents numerous stakeholder comments, including concerns on cattle grazing, requests from government agencies for forest restoration, one (1) community stakeholder requesting reforestation, and one (1) comment regarding access to restored wetlands for livestock.<br><br>Additional evidence from the Environmental Prospectus & Environmental Management Plan for the Unki South Bulk Sample Collection (Black Crystal, September 2021) indicates that stakeholder consultation was conducted as part of the bulk sampling pit project, including discussion of potential impacts to biodiversity and ecosystem services. |

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| | | | The Biodiversity Offset Management Plan for Miombo Woodland (Zimudzi, February 2024) outlines objectives to compensate for residual impacts on Miombo woodlands through habitat restoration, enhancement, and conservation measures to achieve NNL or Net Positive Impact (NPI), supported by long-term monitoring, evaluation, and adaptive management. The Unki Wetland Rehabilitation Plan (Nhiwatiwa, February 2024) assesses interventions to restore degraded wetlands within the mine claim area, rehabilitating and repurposing approximately 36 hectares of borrow pits and legacy artisanal prospecting pits to achieve a net positive hectare equivalence for wetland habitats affected by the Solar PV project.<br><br>The Unki Rehabilitation Planning: 5-Year Rolling Rehabilitation Plan (Anglo American, 2023) identifies seven (7) priority areas for rehabilitation for 2025–2028, assesses current and forecasted disturbances, including from the Unki South Bulk Sampling Pit, slag storage facility, and expansion of the Unki Tailings Storage Facility (TSF), and prioritizes rehabilitation activities based on financial availability.<br><br>Additionally, the company has implemented broader biodiversity initiatives, such as the 2024–2025 Unki Complex Tree Planting Day, during which 150 Quinine trees were planted near the Main Wall Borrow Pit under the theme “Trees and Forests for Ecosystem Restoration”, further contributing to the enhancement of important biodiversity values and priority ecosystem services.<br><br>Restoration of heritage chromite mine pits (unrelated to the Unki Mine) on the edge of the Unki Mine Concession, which have been identified as part of wildlife corridors, was observed in the field. Pits and waste-rock piles had been levelled to match the surrounding |

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| | | | terrain. Vegetation was observed in different stages of regrowth. Qualified mine personnel indicated that the Unki Mine had implemented these restoration activities. Restoration of a degraded stream channel, by creating an artificial wetland with enhanced ecosystem service value, was observed downstream of the Return Water Dam (RWD). According to qualified mine personnel, fencing and community land-use education have resulted in partial protection and restoration of riparian zones along some streams from cattle overgrazing. A tree-planting day at a restoration site in the identified wildlife corridor, jointly organized by the Unki Mine and the Shurugwi Forestry Commission, was observed in the field. Interviews with communities indicated concern about access to water for their cattle. There were no comments about reforestation.<br><br>The evidence, supported by interviews and observations, indicates that the company has identified past adverse impacts on important biodiversity values and priority ecosystem services and has designed and implemented onsite restoration strategies, as well as additional conservation actions, informed by stakeholder engagement processes, to enhance these values and services at an appropriate geographic scale, as per sub-requirement (a).<br><br>The evidence does not include details to confirm that, for potential new impacts from planned activities (e.g., Unki South Bulk Sampling Pit, the slag storage facility, or the Unki TSF expansion), the company has applied the mitigation hierarchy, prioritized avoidance of impacts on important biodiversity values or priority ecosystem services, and designed offsets proportional to any residual impacts, as per sub-requirement (b). This aspect will be reviewed during the next audit. |

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| 4.6.4.3. | Offsetting, if required, shall be done in a manner that aligns with international best practice. | ◐ | The evidence reviewed includes the Biodiversity Strategy (Valterra Platinum, 2025), which incorporates an offset plan aligned with the core principles of biodiversity offsets as outlined by the Business and Biodiversity Offsets Programme. The Environmental and Social Impact Assessment (ESIA) for a Solar Photovoltaic Facility (SLR Consulting, June 2023) identifies potential ecological impacts, including permanent loss of Miombo woodland and loss of wetland functioning, for which avoidance or minimization was not feasible. The Biodiversity Offset Management Plan for Miombo Woodland (Zimudzi, February 2024) describes how the offset will be implemented, while the Wetland Rehabilitation Plan (Nhiwatiwa, February 2024) assesses interventions to restore degraded wetlands within the Unki mine claim impacted by the Solar PV project and highlights opportunities to achieve substantial biodiversity gains by rehabilitating and managing wetlands outside the planned development area.<br><br>The Specialist Report and Management Plan for an Aloe and Orchid Species Rescue Operation for the Solar Plant Project at Unki Mine (Black Crystal, March 2025) documents the rescue and translocation of seven (7) plant species of conservation interest, protected under Zimbabwe's Parks and Wildlife Act 20:14, and outlines the care and maintenance measures required to ensure their successful establishment and long-term survival in new locations. A Progress Report on the Solar PV wetland and Miombo woodland set-aside area plans (No Author, January 2023) provides general information on habitat degradation and the extent of rehabilitation possible for each hydrogeomorphic wetland unit.<br><br>Preliminary offsetting was observed at the constructed wetland downstream of the Return Water Dam, along the Solar PV facility, |

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| | | | and the geomorphic and soil restoration and revegetation at the chromite mines on the boundary of the Unki Mine concession.<br><br>The evidence, supported by on-site observations, indicates that the company has completed the foundational planning and demonstrated intent and preliminary actions for biodiversity offsetting, including a timeline, in line with best international practice.<br><br>The evidence does not indicate that the offsets have been fully developed or implemented and will need to be evaluated at the next audit, as per the timeline in the Biodiversity Strategy. |
| 4.6.4.4. | The operating company shall develop and implement a biodiversity management plan or equivalent that:<br><br>a. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services;<br><br>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; | ◐ | The evidence reviewed includes the Biodiversity Strategy (Valterra Platinum, 2025), which sets out strategic objectives for achieving operational excellence in biodiversity management. It covers requirements for adherence to the mitigation hierarchy, No Net Loss (NNL), no-go commitments, and other key principles, and provides measurable success indicators, timelines (including monitoring frequency), and planned activities. The strategy also identifies Key Performance Indicators, including habitat disturbance, biodiversity net gain, species conservation, offset implementation, community engagement, invasive species control, aquatic biodiversity, and water quality, as well as training and awareness initiatives.<br><br>The Biodiversity Management Plan timeline indicators (No Author, 2024) track the status of tasks and deliverables, including the biodiversity and ecosystem services baseline, impact assessment and mitigation planning, biodiversity offsets and additional conservation actions, and the biomonitoring programme. All tasks |

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| | c. Provides a budget and financing plan to ensure that funding is available for effective mitigation. | | associated with the biodiversity and ecosystem services baseline, such as biodiversity value assessment, identification of Significant Biodiversity Features (SBFs) and Priority Ecosystem Services (PES), baseline data for SBFs and PES, and an overview of protected and key biodiversity areas, were completed on schedule, achieving 100% of the planned tasks within the indicative timelines.<br><br>Additional supporting evidence includes the Unki Roadmap Biodiversity Management Plan and Environmental DNA monitoring schedule for freshwater vertebrates (2022), which provides budgets from 2020–2022 aligned with the Biodiversity Standard requirements, as well as Environmental DNA monitoring costs for 2021–2023.<br><br>The evidence indicates that the company:<br><br>a. Has outlined specific objectives with measurable conservation outcomes, timeline, and activities that will be implemented to avoid, minimize, restore, enhance, and offset adverse impacts on biodiversity and ecosystem services;<br><br>b. Has identified key indicators, and ensured that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time;<br><br>c. Provides a budget and financing plan to ensure that funding is available for effective mitigation through 2023.<br><br>The evidence does not include details to confirm that the company:<br><br>a. Has outlined the locations where activities will be implemented to avoid, minimize, restore, enhance, and, if necessary, offset adverse impacts on biodiversity and ecosystem services. |

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| | | | c. A long-term budget for implementation past 2023. |
| 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 evidence reviewed includes the Biodiversity Standard (Anglo American, Version 4, December 2023) and the associated Biodiversity Guideline (Anglo American, Version 1, January 2024), which apply across the mine lifecycle and require the implementation of adaptive management and monitoring programmes using site-specific, science-based indicators, as well as the periodic updating of Biodiversity Management Plans to reflect new information, changes to the site footprint or area of influence, and progress toward biodiversity outcomes. The evidence also includes the Biodiversity Strategy (Valterra Platinum, 2025), which requires operations to update Quality Habitat Hectare metrics every three (3) years. In addition, the Community Environmental Performance Presentation (Q1 2025) identifies the need to update biodiversity management plans.<br><br>The evidence indicates that the company's biodiversity management includes a defined process for updating or adapting the management plan as new information on biodiversity or ecosystem services becomes available throughout the mine lifecycle. |
| 4.6.5.1. | An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company: | — | Not Relevant. Unki is an existing mine with expansions and is not located within a legally protected area. The evidence reviewed includes a Critical Habitat Assessment for the Unki Solar PV Project (SLR Consulting, February 2023) and a Proximity Report – Unki 2024 Biodiversity Update (Human, August 2024), both of which confirm that the site is outside any legally protected area. |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | a. Demonstrates that the proposed development in such areas is legally permitted;<br>b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;<br>c. Conducts mining-related activities in a manner consistent with protected area management plans for such areas; and<br>d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. | | An interview with the District Environmental Officer of the Environmental Management Agency (EMA) further confirmed that the Unki Mine concession is not situated within a legally protected area.<br>The company does not currently plan new exploration or the development of new mines. The Biodiversity Strategy (Valterra Platinum, 2025) includes a No-go commitment prohibiting mining in legally protected areas. This is reinforced by the Biodiversity Standard (Anglo American, December 2023), which prohibits activities in legally designated or internationally recognized protected areas unless formally approved by the Director of Strategy & Sustainability, following an independent review demonstrating compliance with IRMA requirements 4.6.5.1 and 4.6.5.2. |
| 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 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.<br>• International Union for Conservation of Nature (IUCN) | — | Not Relevant. Unki is an existing mine with expansions and is not located within International Union for Conservation of Nature (IUCN) protected area management category IV sites, Ramsar sites that are not IUCN categories I–III, or buffer zones of UNESCO biosphere reserves. This is supported by the Critical Habitat Assessment for the Unki Solar PV Project (SLR Consulting, February 2023) and the Proximity Report: Unki 2024 Biodiversity Update (Human, August 2024).<br>Qualified personnel at the mine confirmed that the entire Unki Mine concession does not intersect any of the conservation areas listed above. |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | protected area management category IV protected areas;<br>• Ramsar sites that are not IUCN protected area management categories I-III; and<br>• Buffer zones of UNESCO biosphere reserves. | | The company currently does not plan any new mining-related activities. The Biodiversity Strategy (Valterra Platinum, 2025) includes a No-go commitment prohibiting mining in World Heritage Sites, Ramsar wetlands, or legally protected areas. Similarly, the Biodiversity Standard (Anglo American, December 2023) prohibits activities in UNESCO World Heritage Sites; including their recognized buffer zones, legally designated protected areas, and internationally recognized protected areas, except under written approval from the Director of Strategy & Sustainability, following an independent review demonstrating compliance with IRMA requirements 4.6.5.1 and 4.6.5.2. |
| 4.6.5.3. | Critical. IRMA will not certify new mines that are developed in or that adversely affect the following protected areas:<br>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;<br>• IUCN protected area management categories I-III;<br>• Core areas of UNESCO biosphere reserves. | — | Not relevant. Unki is an existing mine. The evidence, an initial Environmental Impact Assessment (EIA) (2003), a Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., September 2020), a Biodiversity and Ecosystem Services Baseline Assessment – Gap Analysis (Nhiwatiwa et al., 2022), and Critical Habitat Assessment for the Solar PV (SLR, October 2022), indicate that the mine is not located in UNESCO World Heritage Sites, core areas of UNESCO biosphere reserves and IUCN Protected area management categories I-III. The mine is also not located in the two (2) areas (Ziwa National Monument and Naletale Cluster of Dzimbabwes) currently on Zimbabwe's official Tentative List for World Heritage Site Inscription. |
| 4.6.5.4. | Critical. An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that: | — | Not relevant. Unki is an existing mine. The evidence, an initial Environmental Impact Assessment (EIA) (2003), a Biodiversity Baseline and Ecosystem Services Assessment (Nhiwatiwa et al., September 2020), a Biodiversity and Ecosystem Services Baseline |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | a. The mine was developed prior to the area's official designation;<br>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<br>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. | | Assessment – Gap Analysis (Nhiwatiwa et al., 2022), and Critical Habitat Assessment for the Solar PV (SLR, October 2022), indicate that the mine concession does not overlap with a declared national or international protection area listed in 4.6.5.3. |
| 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 evidence reviewed includes the Biodiversity Standard (Anglo American, December 2023) and the associated Biodiversity Guideline (Anglo American, January 2024), both of which apply to the full mining lifecycle and require the development and implementation of a monitoring programme to evaluate the effectiveness of mitigation measures on reducing biodiversity impacts and tracking progress toward achieving NPI targets. Additional evidence includes the Biodiversity Strategy (Valterra Platinum, 2025) and the Integrated Safety, Health and Environment (SHE) Performance Monitoring, Evaluation and Analysis Plan (Valterra Platinum, 2025), which state that the company has developed a monitoring programme to track key biodiversity parameters, including habitat disturbance, biodiversity net gain, |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | species conservation, offset implementation, community engagement, training and awareness, aquatic biodiversity, and water quality. The Monitoring Plan (Valterra Platinum, 2025) further outlines monitoring procedures and associated methodologies.<br><br>Supporting evidence also includes the Environmental DNA Monitoring Report on Freshwater Vertebrates (NatureMetrics, 2024); the Assessment of Vegetation Condition and Habitat Connectivity identifying restoration opportunities at the mine (Flora and Fauna International, January 2025); a Signed Agreement for the Provision of Biomonitoring Services commencing 1 April 2025 for a six-month period (Scientific and Aquatic Services, March 2024); and the associated Biomonitoring Report for sampling conducted between 26–30 May 2025 (Scientific and Aquatic Services, June 2025). Collectively, this evidence demonstrates that the biodiversity monitoring programme is being implemented and that scheduled monitoring activities align with the Monitoring Plan (2025). Evidence from SHEQ meetings (Valterra Platinum, June and August 2025) further indicates the need for monthly monitoring of the implementation of the Biodiversity Management Plan.<br><br>The evidence indicates that the company has developed and partially implemented a programme to monitor the Biodiversity and Ecosystem Services Management Plans. The implementation includes aquatic monitoring of most water bodies, except for the Dwimbika River downstream of the Lucilia Poort Dam. A timetable of objectives is established through 2030.<br><br>The evidence does not indicate implementation of terrestrial biodiversity monitoring, nor does it demonstrate a clear commitment or schedule for programme continuation beyond |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | | | 2030 to ensure coverage of the full mine lifecycle, including closure and post-closure. |
| 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 evidence reviewed includes the Biodiversity Strategy (Valterra Platinum, 2025) and the Integrated Safety, Health and Environment (SHE) Performance Monitoring, Evaluation and Analysis Plan (Valterra Platinum, 2025), both of which demonstrate direct alignment with No Net Loss and Net Gain targets by providing measurable success indicators, key performance indicators to be monitored, and defined timelines and monitoring frequencies. The Monitoring Plan (Valterra Platinum, 2025) further details the monitoring procedures and methodologies to be applied. Additional evidence includes the Biodiversity Management Plan Timeline Indicators (Valterra Platinum, 2024), which tracks the status of tasks and deliverables related to the Biodiversity and Ecosystem Services Baseline, impact assessment and mitigation planning, biodiversity offsets and conservation actions, the biomonitoring programme, and broader implementation and management activities. This document shows that all tasks related to the biodiversity baseline, impact assessment, and mitigation planning (nine tasks) had been fully completed within the indicative timelines. Within the biodiversity offsets and conservation actions component,<br><br>one activity had been completed within its timeline, two (2) were in progress, and one (1) was planned but had not yet commenced. Under the biomonitoring program, two (2) activities were in progress while one (1) remained in the planning stage. All activities related to implementation and management had been planned but not yet executed. |

| Req # | Requirement | Score | Basis for Rating |
| --- | --- | --- | --- |
| | | | Further supporting evidence includes available monitoring reports and data, such as the Environmental DNA Monitoring Report on Freshwater Vertebrates (NatureMetrics, 2024); the Assessment of Vegetation Condition and Habitat Connectivity identifying restoration opportunities (Flora and Fauna International, January 2025); the Community Environmental Performance Presentation (Valterra Platinum, Q1 2025); and the Biomonitoring Report for sampling conducted between 26–30 May 2025 (Scientific and Aquatic Services, June 2025). Collectively, these documents indicate that the monitoring undertaken to date is occurring with the frequency indicated in the Monitoring Plan (2025) and with sufficient detail as outlined in the Valterra Biodiversity Strategy (2025).<br><br>The evidence indicates that the company is monitoring key biodiversity indicators with sufficient detail and frequency across most ecosystems to enable evaluation of the effectiveness of mitigation strategies and progress toward achieving at least No Net Loss or Net Gain in biodiversity and ecosystem services over time.<br><br>The evidence does not include documentation confirming that biodiversity monitoring is being conducted in the Dwimbika River downstream of the Lucilia Poort Dam. |
| 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 | — | Not relevant. The evidence reviewed includes the Biodiversity Standard (Anglo American, December 2023) and the associated Biodiversity Guideline (Anglo American, January 2024), both of which require the development and implementation of monitoring programmes to track progress toward achieving NPI targets and to ensure that monitoring results are analysed and evaluated to determine whether corrective actions, including additional |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| | effective corrective action in consultation with relevant stakeholders. | | mitigation measures, are required. Additional evidence includes the Safety, Health and Environment (SHE) Policy (Valterra Platinum, 2025), which commits the company to proactively reducing or preventing non-conformances, learning from incidents, and striving for continual improvement through monitoring of objectives and programmes. The Non-Conformity and Corrective Actions Procedure (Valterra Platinum, 2025) provides guidance on how identified non-conformances or deviations arising from monitoring and measurement activities are to be addressed. Supporting documentation includes the Environmental DNA Monitoring Report on Freshwater Vertebrates (NatureMetrics, 2024); the Assessment of Vegetation Condition and Habitat Connectivity identifying restoration opportunities (Flora and Fauna International, January 2025); the Community Environmental Performance Presentation (Valterra Platinum, Q1 2025); and the Biomonitoring Report for sampling conducted between 26–30 May 2025 (Scientific and Aquatic Services, June 2025). These documents indicate generally stable monitoring results, with some variation in water quality and an observed impact on macro-invertebrate community integrity attributed to artisanal mining unrelated to Unki Mine; continued monitoring is therefore required to identify any emerging trends.<br><br>The evidence indicates that, to date, there are no deviations or non-conformances related to the objectives outlined in the company's biodiversity strategy, suggesting that the monitored indicators and objectives are being met.<br><br>Since the monitoring program was implemented only recently, there is insufficient multi-seasonal data to assess trends; therefore, additional monitoring results will be reviewed during the next audit to determine whether the objectives are being achieved. |

| Req # | Requirement | Score | Basis for Rating |
|---|---|---|---|
| 4.6.6.4. | The findings of monitoring programs shall be subject to independent review. | ⊗ | The evidence reviewed includes the corporate-level Biodiversity Strategy 2025 (Valterra Platinum), which commits the company to third-party verification and public reporting, as well as several monitoring reports and datasets. These include the Environmental DNA Monitoring Report on Freshwater Vertebrates (NatureMetrics, 2024); the Assessment of Vegetation Condition and Habitat Connectivity, highlighting restoration opportunities (Flora and Fauna International, January 2025); the Community Environmental Performance Presentation (Valterra Platinum, Q1 2025); and the Biomonitoring Report for sampling conducted between 26–30 May 2025 (Scientific and Aquatic Services, June 2025).<br><br>Interviews with relevant staff indicate that international experts have been contracted to support the design of the monitoring programme, and that the Endangered Wildlife Trust (EWT) reviews recent biodiversity studies prior to the publication of results online.<br><br>The evidence does not include details confirming that the findings of the company's monitoring programs have yet to be subjected to a comprehensive independent review. |

## Chapter 4.7—Cyanide Management

| | |
|---|---|
| Chapter Relevant? | No |
| Overall Chapter Score | Not relevant |
| Chapter Score Basis | Not relevant |

Chapter Not Relevant.

The evidence reviewed includes the initial Environmental Impact Assessment (EIA) (Scott Wilson, 2003) for the mine, and an EIA for the Smelter (Africa Ascon, 2016).
The EIA's describe the mining and processing activities at the site. After crushing and milling, the ore goes to the concentrator where a set of activators, depressants, promoters, and other chemicals are used to produce concentrate. The 2003 EIA explicitly states that this process does not use cyanide. According to the 2016 Smelter EIA, the concentrate is subsequently directed to a flash dryer to reduce its moisture content before being fed into the furnace. There, at temperatures ranging from approximately 1,300 to 1,700 degrees Celsius, the material is smelted and separated into slag, a waste byproduct, and matte, which contains the valuable platinum group metals.
The site is not a signatory of the Cyanide Code.

The evidence indicates the company does not mine gold or silver, which are metals typically associated with cyanide use in leaching processes, and per the evidence, no cyanide is used at the site during mining or processing activities.

## Chapter 4.8—Mercury Management

| | |
|---|---|
| Chapter Relevant? | No |
| Overall Chapter Score | Not relevant |
| Chapter Score Basis | Not relevant |

Chapter Not Relevant.

Chapter 4.8 of the IRMA Standard (2018) addresses the responsible management of mercury to protect human health and the environment. This chapter applies to mining operations that use thermal processes such as autoclaves, roasters, carbon kilns, refining furnaces, or similar equipment that could result in significant mercury emissions, typically associated with the extraction or pre-treatment of metals like gold, silver, copper, or zinc, which may contain mercury-bearing minerals.

The evidence reviewed includes the initial Environmental Impact Assessment (EIA) (Scott Wilson, 2003) for the mine, and an EIA for the Smelter (Africa Ascon, 2016).
The EIA's describe the ore type (platinum-group metals from the Great Dyke), which is typically not associated with mercury, and its processing methods (crushing, milling, flotation, and smelting) (see Chapter 4.7). These documents indicate that the mine does

not use mercury in its processes, or processes mercury-bearing ores.

The evidence indicates that the company does not mine metals typically associated with mercury emissions (e.g., gold, silver, copper, zinc), that no mercury-bearing minerals have been identified at the site, and that mercury is not used at the site during mining or processing activities.

# APPENDIX B – Corrective Action Plan

| Topic | Criteria Number | Criteria Name | Requirement Number | Requirement Text | Rating | Action Plan |
|---|---|---|---|---|---|---|
| Planning and Financing Reclamation and Closure | 2.6.2 | Reclamation and Closure Planning | 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. | ◔ | • Integrate post-mining land use and mine closure into the Stakeholder Engagement Plan to ensure structured and ongoing community involvement.<br>• Develop and present a comprehensive PMLU Options Pack outlining maps, end-use scenarios, constraints, liabilities, funding, and success criteria.<br>• Use Quarterly Community Engagement Forums (CEF) to present 5-year and annual rehabilitation plans and ensure transparency.<br>• Facilitate participatory decision-making with stakeholders to gather inputs, refine land-use options, and agree on rehabilitation priorities.<br>• Implement a formal agreement and disclosure process, including documented stakeholder approvals and publication of plain-language summaries of decisions and inputs. |
| Planning and Financing Reclamation and Closure | 2.6.4 | Financial Surety for Mine Closure | 2.6.4.1 | Financial surety instruments shall be in place for mine closure and post-closure. | — | While international good practice recognises several forms of financial assurance these mechanisms are not formally established, standardised, or consistently implemented within our regulatory framework. There is no established, dedicated legal or institutional |

| Topic | Criteria Number | Criteria Name | Requirement Number | Requirement Text | Rating | Action Plan |
|---|---|---|---|---|---|---|
| | | | | | | framework ensuring that such funds would be segregated, protected, and exclusively applied to mine closure purposes.<br><br>Retaining the provision within the company allows for greater control, accountability, and assurance that sufficient funds will be available and applied directly to rehabilitation activities when required.<br><br>Until such time that the country has a robust and transparent mechanisms in place, the internal provisioning approach will be maintained. The operation will always ensure that the provisioning continues to be aligned with good practice and transparency in financial reporting and closure planning. |
| Fair Labor and Terms of Work Requirements | 3.1.5 | Grievance Mechanism | 3.1.5.1 | The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:<br><br>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;<br><br>b. Shall allow for anonymous complaints to be raised and addressed; | ◕ | • Conduct a targeted engagement survey to identify and analyse the root causes of fear of retaliation and lack of psychological safety in the grievance reporting process. Survey to cover<br><br>-Perceived risks of reporting grievances<br><br>-Trust in supervisors and management<br><br>-Effectiveness and confidentiality of current reporting channels<br><br>• Continuously raise awareness and provide assurance on the anonymous reporting channels available to employees and emphasizing on |

| Topic | Criteria Number | Criteria Name | Requirement Number | Requirement Text | Rating | Action Plan |
|---|---|---|---|---|---|---|
| | | | | c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and<br><br>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. | | -Non-retaliation principles<br><br>-Confidential handling of complaints<br><br>• Building trust and psychological safety in teams |
| Occupational Health and Safety | 3.2.4 | Measures to Protect Workers | 3.2.4.1 | The operating company shall implement measures to protect the safety and health of workers including:<br><br>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;<br><br>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;<br><br>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;<br><br>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; | | • Conduct a root cause analysis of gaps in risk communication and PPE management to identify why procedures are inconsistently implemented.<br><br>• Revise and standardize systems to ensure task-specific risk communication and fit-for-purpose PPE selection, quality standards, and replacement criteria.<br><br>• Strengthen implementation and accountability through supervisor enforcement, toolbox talks, and routine inspections.<br><br>• Deliver targeted training and worker engagement to improve understanding of occupational risks and incorporate feedback on PPE adequacy.<br><br>• Establish monitoring and verification mechanisms (audits, worker interviews, KPIs) to confirm consistent implementation and demonstrate sustained compliance |

| Topic | Criteria Number | Criteria Name | Requirement Number | Requirement Text | Rating | Action Plan |
|---|---|---|---|---|---|---|
| | | | | e. Providing adequate supervision and control on each shift; and<br>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground. | | |
| Waste and Materials Management | 4.1.4. | Waste Facility Assessment | 4.1.4.1. | A risk-based approach to mine waste assessment and management shall be implemented that includes:<br>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;<br>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;<br>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<br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | ◕ | • Compare SQRA 05/2025 findings to current risk register, bowties, library control, SOPs, maintenance strategies and update Risk Register as required<br>• Cascade relevant finding to TSF SOPs, maintenance routines, inspection checklists<br>• Include risk update section in monthly TSF meeting<br>• Review TARP as required by the risk update.<br>• Train TSF Team on applicable changes |

| Topic | Criteria Number | Criteria Name | Requirement Number | Requirement Text | Rating | Action Plan |
|---|---|---|---|---|---|---|
| Water Management | 4.2.4. | Monitoring and Adaptive Management | 4.2.4.1. | 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:<br>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);<br>b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics;<br>c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics;<br>d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;<br>e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and<br>f. Use accredited laboratories capable of detecting contaminants at levels below the | ◔ | • Review and update adaptive Water Management plan to include Dwimbika stream monitoring stations.<br>• Compile: training records, qualifications, SOP signoffs, and experience records for water sampling team.<br>• Conduct yearly refresher training on water sampling and monitoring procedures. |

| Topic | Criteria Number | Criteria Name | Requirement Number | Requirement Text | Rating | Action Plan |
|---|---|---|---|---|---|---|
| | | | | values in the IRMA Water Quality Criteria by End-Use Tables. | | |
| Water Management | 4.2.4. | Monitoring and Adaptive Management | 4.2.4.4. | The operating company shall develop and implement an adaptive management plan for water that:<br><br>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<br><br>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. | | • Review dam release rules, seasonal baseflow patterns, ecological requirements and develop SOP including triggers related to the activity. Activities downstream / points along the line / seasonal<br><br>• Conduct a hydrological and ecological assessment of the Dwimbika stream to:<br><br>-Determine natural/seasonal baseflow conditions<br><br>-Identify ecological flow requirements downstream of the LPD<br><br>-Develop and document a clear, rationale where baseflows are not maintained.<br><br>• Develop specific, measurable trigger levels for both Dwimbika Stream (Downstream of LPD) and seasonal Discharges from RWD |
| Biodiversity, Ecosystem Services and Protected Areas | 4.6.2 | Biodiversity, Ecosystem Services and Protected Areas Screening | 4.6.2.1 | 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. | | • Review existing studies (EIA) and baseline studies, IUCN Red List, Key Biodiversity Areas (KBAs), protected area proximity, land cover changes to identify critical habitat for Dwimbika River<br><br>• Include Dwimbika in the review of Biodiversity assessment for 2027 and Update Biodiversity Management Plan (BMP). The reviews will include update of ecosystem services and wildlife corridors for the area. |

# APPENDIX C – List of Abbreviations

| Abbreviation | Full Name |
|---|---|
| ACA | Additional Conservation Actions |
| ADMS | Atmospheric Dispersion Modelling System |
| AERMOD | US EPA Air Dispersion Model |
| AMP | Adaptive Management Plan |
| AMWUZ | Associated Mine Workers Union of Zimbabwe |
| ANCOLD | Australian National Committee on Large Dams |
| AQMP | Air Quality Management Plan |
| BAP | Best Available/Applicable Practices |
| BAT | Best Available Technologies |
| BCMP | Business Continuity Management Plan |
| BEI | Biological Exposure Index |
| BNG | Biodiversity Net Gain |
| CBA | Collective Bargaining Agreement |
| CEC | Community Environment Committee |
| CEF | Community Engagement Forum |
| CEPRP | Community Emergency Preparedness and Response Plan |
| CHMP | Cultural Heritage Management Plan |
| CHS | Community Health and Safety |
| CHWSIA | Community Health, Wellbeing and Safety Impact Assessment |
| CO | Carbon Monoxide |
| COP | Code of Practice |
| CPI | Consumer Price Index |
| CV | Curriculum Vitae |
| DCPU | District Civil Protection Unit |
| EDNA | Environmental DNA |
| EIA | Environmental Impact Assessment |
| EMA | Environmental Management Agency |
| EMP | Environmental Management Plan |
| EoR | Engineer of Record |
| EPRP | Emergency Preparedness and Response Plan |
| ERP | Emergency Response Plan |
| ESIA | Environmental and Social Impact Assessment |
| ESMP | Environmental and Social Management Plan |
| ESMS | Environmental and Social Management System |
| EU | European Union |
| EWT | Endangered Wildlife Trust |
| FPIC | Free, Prior and Informed Consent |

| Abbreviation | Full Name |
|---|---|
| GBV | Gender-Based Violence |
| GHG | Greenhouse Gas |
| GISTM | Global Industry Standard on Tailings Management |
| HBV | Harassment, Bullying, Victimisation |
| HCl | Hydrochloric Acid / Hydrogen Chloride |
| HF | Hydrogen Fluoride / Hydrofluoric Acid |
| HR | Human Resources |
| IBAT | Integrated Biodiversity Assessment Tool |
| IEC | International Electrotechnical Commission |
| IFC | International Finance Corporation |
| IFRS | International Financial Reporting Standards |
| IRMA | Initiative for Responsible Mining Assurance |
| ISO | International Organization for Standardization |
| JRA | Job Risk Assessment |
| KBA | Key Biodiversity Area |
| LAeq | A-weighted Equivalent Continuous Sound Level |
| LPD | Lucilia Poort Dam |
| MEND | Mine Environment Neutral Drainage |
| MM5 | Mesoscale Meteorological Model v5 |
| MOU | Memorandum of Understanding |
| MRF | Mineral Residue Facility |
| NEC | National Employment Council |
| NMMZ | National Museums and Monuments of Zimbabwe |
| NNL | No Net Loss |
| NO2 | Nitrogen Dioxide |
| NPI | Net Positive Impact |
| NPV | Net Present Value |
| NSSA | National Social Security Authority |
| OEL | Occupational Exposure Limit |
| OHS | Occupational Health and Safety |
| OMS | Operations, Maintenance and Surveillance |
| PCD | Pollution Control Dam |
| PES | Priority Ecosystem Services |
| PM2.5 | Particulate Matter with an aerodynamic diameter of 2.5 micrometers |
| PM10 | Particulate Matter with an aerodynamic diameter of 10 micrometers |
| PPE | Personal Protective Equipment |
| PUE | Priority Unwanted Event |
| PV | Photovoltaic |
| RWD | Return Water Dam |
| SAR | Sodium Adsorption Ratio |

| Abbreviation | Full Name |
|---|---|
| SBF | Significant Biodiversity Features |
| SED | Socio-Economic Development |
| SHE | Safety, Health and Environment |
| SHEQ | Safety, Health, Environment, Quality |
| SHIRA | Social and Human Rights Impact Risk Assessment |
| SLAM | Stop, Look, Assess, Manage |
| SMI | Safety Management Information |
| SO2 | Sulphur Dioxide |
| SQRA | Semi-Quantitative Risk Assessment |
| TARP | Triggered Action Response Plan |
| TFMS | Tailings Facility Management System |
| TRP | Technical Review Panel |
| TSF | Tailings Storage Facility |
| USD | United States Dollar |
| VOC | Volatile Organic Compounds |
| WHO | World Health Organization |
| WRAC | Workplace Risk Assessment and Control |
| ZDMWU | Zimbabwe Diamond and Allied Minerals Workers Union |
| ZINWA | Zimbabwe National Water Authority |
| ZWD | Zimbabwean Dollar |
| ZWS977 | Zimbabwe Standard for Ambient Air Quality |

# APPENDIX D – Endnotes

[1] https://tools.responsiblemining.net/self-assess/

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

[3] 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

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

[5] IRMA website: “Complaints and Feedback.” https://responsiblemining.net/what-you-can-do/complaints-and-feedback/

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

[7] IRMA web site “Mines Site Assessments”: https://responsiblemining.net/what-we-do/certification/mines-under-assessment/