Initiative for Responsible
Mining Assurance
Aimee Boulanger
Executive Director
aboulanger@responsiblemining.net

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Anthony Williams
C-/O Anthony Phillip Williams Consulting (a Trading Company of 1st family Holdings (Pty) Ltd
14 Melkbos Street
Kathu, 8664
Northern Cape Province
South Africa

By email: 1stfamilyholdings2021@gmail.com

Dear Anthony,

We want to start with expressing our appreciation to you for engaging in the IRMA process and seeking to use it as a tool to increase transparency and drive improved mining practices. We share your concern and agree that few issues are as challenging to address as resettlement.

We want to support the concerns you've raised being heard by the mining company first and foremost. Ultimately, it is the site who is responsible for responding to community concerns and, where necessary, remediating impacts and improving operations going forward. Where you describe ongoing impacts from resettlement these substantive issues will benefit from attention by the mining company. So, we recommend you share these concerns with Sishen if you have not already done so. We can help you connect with the right people if you need contact information.

IRMA's Issues Resolution System is designed to understand feedback and complaints that are brought to IRMA's attention and get them resolved in an efficient, accountable and fair manner. As we explained on our initial call on August 25, 2026, that procedure provides for several resolution pathways depending on the issue being raised.

In our analysis of your letter, we have categorized your feedback as follows: (1) those related to how the site is responding to community concerns regarding resettlement and ongoing impacts related to resettlement; (2) issues related to IRMA policies and procedures as well as those related to the IRMA Standard and, (3) issues related to the actions or inactions of the audit firm, ERM CVS. Again, if you haven't done so, we recommend you follow up directly with Sishen if you haven't already done so. IRMA will respond directly to the second set of issues. The third set of issues have been referred to ERM CVS for resolution. IRMA's Audit Firm Requirements and ISO 17021, upon which the IRMA requirements are based, ask that audit firms have public processes to receive, evaluate and make decisions on complaints.

With this letter, we provide you with a response to the questions that relate to IRMA's oversight of audit firms and the Standard. We have not addressed the issues that relate to how ERM CVS weighed and assessed evidence and reached the conclusions that they did. Again, we have referred those questions to ERM CVS to be considered according to their internal grievance and review procedure. We will forward their response as soon as we receive it.

If the collective responses from IRMA and ERM CVS do not result in successful resolution of your concerns, you will be able to escalate these issues to an Ad Hoc Resolution Committee composed of four IRMA Board members. Of course, our goal is to resolve your concerns directly, without the need for the Ad Hoc Resolution Committee.

We look forward to answering any further questions you may have.

Auditor independence

IRMA works to ensure the independence of auditors by approving and training only a small set of audit firms, and their right to audit is granted by and overseen by IRMA and can be taken away if they do not reflect the expectations of IRMA's multistakeholder governed system. We require approved audit firms to follow conflict of interest rules and meet technical and expertise criteria, and draft audit reports are reviewed by IRMA's Director of Assurance prior to finalization. These requirements are designed to ensure credibility, independence, and quality of IRMA's assurance activities. You can find the full set of requirements here.

We contract Assurance Services International (ASI) to conduct periodic assessments of each of IRMA's accredited audit firms. These assessments evaluate the firms' conformity with IRMA audit firm requirements, based on ISO17021, which establish competency, consistency and impartiality requirements for audit and certification firms.

More specifically, audit firms are expected to arrange their own transport and not rely on mine site vehicles. This expectation is communicated to audit firms regularly. We know that in some contexts this isn't possible. We have asked ERM CVS to provide an explanation why mine vehicles were used in this instance.

Scope of surveillance audit

IRMA audits are three-year cycles. Surveillance audits, which occur midway through this three-year cycle, are not designed to be a full reevaluation of all audit findings. Surveillance audits focus on critical requirements, progress on the corrective actions, stakeholder complaints submitted since the last audit, as well as any changes in operations that would materially affect the site's ability to maintain its achievement level.

In general, a surveillance audit is not, by default, used to adjust (up or down) a site's achievement level. Surveillance audits are deliberately narrow in scope and are not meant to substitute for a full reassessment.

As of 2024, mines can also elect a limited option to have their score and achievement level updated at their first surveillance audit (~twelve months after the initial audit report), to reflect resolution of findings from the initial audit. But this would be in lieu of the optional twelve-month corrective action period and applies only within the initial 3-year audit cycle, not to subsequent cycles.

All that said, if there is evidence of a material decline in performance, audit firms do have the power to suspend an achievement level at surveillance.

For more information, please see the Assessment Manual for Mines; the 2022 decision of the Assurance Subcommittee; and the 2024 decision of the Assurance Subcommittee.

How is past resettlement assessed in the IRMA system?

The Sishen surveillance audit documents that the resettlement situation is not resolved. During the initial assessment a small number of directly affected residents were interviewed (2 from Dingleton; 8 from Siyathemba), and this feedback was considered alongside the reviewed Resettlement Action Plan (RAP) and the quarterly third-party monitoring reports presented by the mine.

We note the finding in the surveillance audit that Sishen is nearing completion of the resettlement close-out audit (Surveillance Audit, p.51). if you are not already engaged in that close-out audit, you could request to be consulted. This could be an opportunity for the Dingleton community's experiences to be tested against the mine's documented actions.

The surveillance audit already flags resettlement as a specific focus area for the next renewal audit, and this complaint itself will be logged as stakeholder input feeding that renewal audit's scope.

Regarding how the Sishen resettlement compares to resettlements at other IRMA-audited mines globally, each site and affected community represents very different conditions under which resettlement was required, how the process was managed, the degree to which community members were involved in the process, whether the government played a role, and how the action plan has been implemented and monitored. All IRMA reports are public, and we invite you to review those reports. IRMA has not conducted a side-by-side comparison, however we seek to learn and

improve as more mines are audited against the IRMA Standard. If you are directly familiar with both sites and find inconsistencies that you don't believe are due to the unique circumstances of each site, we would very much value a conversation with you on this.

Why do auditors not commission their own assessments or analysis?

IRMA audits are conformity assessments against the requirements in the IRMA Standard and are not independent investigations. This means that audits do not replace or duplicate primary scientific testing, and they're not designed to.

Some of IRMA's requirements relate directly to an expectation for planning documentation such as policies and procedures, whereas other requirements look for effectiveness of implementation. This can often be discerned by carefully reviewing in the IRMA Standard Guidance notes for each requirement under the columns for "Means Of Verification" and "Examples Of Evidence." For instance, to confirm effectiveness of implementation the guidance might recommend auditors review additional records, make observations, or seek input from workers or external stakeholders. Input from workers and community members is instrumental for auditors to gain a complete picture of how a mine affects a community, including environmental and social performance.

Reliance on one audit firm

IRMA does not preclude audit firms from conducting independent audits for more than one site owned by the same parent company. From a practical standpoint, that would make it difficult for mining companies to have multiple sites participating in IRMA (i.e., we have 4 approved audit firms and therefore they would be limited to 4 participating sites).

As we explained above, IRMA works to ensure the independence of auditors by approving and training only a small set of audit firms, and their right to audit is granted by and overseen by IRMA and can be taken away if they do not reflect the expectations of IRMA's multistakeholder governed system. As IRMA audits are more in-depth and engage more local people in the review than nearly any other audit globally, the firms are amidst in-depth learning and developing new systems. In addition, to your point above on how performance at different sites is measured, as audit firms review an increasing number of mines against the IRMA Standard they are increasingly fluent in the similarities/differences across mining operations.

We also require that all approved audit firms be independently accredited under ISO 17021 or be similarly assessed against ISO 17021 and approved by an independent oversight body, Assurance Services International. ISO 17021 is an international standard that sets requirements for bodies providing auditing and certification of management systems. It ensures these organizations operate with competence, consistency, and impartiality. Because of its global recognition and broad adoption, IRMA has adopted this as a framework for setting minimum expectations for audit firms, including independence.

As the IRMA system matures, we are seeing mine sites change from one audit firm to another (e.g. recent announcement in Chile, where Albemarle's renewal audit is being conducted by a new audit firm).

Decoupling payment for audits from the selection of the audit firm is an example that other civil society organizations have raised with us. This recommendation is one that a coalition of Indigenous Peoples organizations also made as part of a joint submission to all voluntary sustainability systems. We will bring this idea to our Assurance Subcommittee of the IRMA Board of Directors for consideration.

Whistleblower or complaints mechanism

We do have a whistleblower or complaints mechanism. As we explained on our initial call, we are treating your letter as a formal complaint as part of this mechanism and have assigned it a reference number, IRMA2026002. A summary of your complaint has been published on our website.

Our issues resolution procedure is available online and provides for complaints to be received confidentially or anonymously and does not restrict any other dispute resolution pathways that may be open to you or another complainant.

All complaints that have been received to date, along with IRMA responses, can be found on the IRMA website under our Issues Resolution System.

Comparison between Kolomela and Sishen

You asked why Kolomela (no resettlement) achieved the same IRMA 75 rating as Sishen. Achievement levels are based on the ratings assigned for individual requirements, which are used to calculate individual chapters scores (chapters cover more than 25 different areas of performance important to the communities who live near mining – water, human rights, air quality, safety, and more) as well as principle scores. Site scores and achievement levels are based on individual site performance against the IRMA standard and are not based on relative performance to each other. Again, as mentioned above, if you know both sites well and seek inconsistencies in how individual requirements or chapters were scored between the two sites, we would be very interested to learn from your perspectives on this.

Conclusion

IRMA's accountability to mining-affected communities, workers, and civil society organizations is the foundation upon which the credibility of our Standard and assurance system rests, and the primary source of value that companies, investors, and purchasing companies derive from participating in the IRMA system. If the quality of our processes does not create genuine confidence for those most directly affected by mining operations, that value is diminished for everyone.

Once again, we want to thank you for the time invested in raising these concerns. We take them very seriously. It is precisely this kind of engaged, critical feedback that allows IRMA to improve, and we hope you will see in our response a sincere commitment to making this process more accountable and meaningful for you. Our priority is to ensure the IRMA system continues to be seen as credible and trusted by rights-holders and civil society, as well as one that helps transform the mining industry. If there are any issues we have not adequately responded to, please do not hesitate to follow up with us directly.

Yours sincerely,



Aimee Boulanger

Executive Director