RUSTENBURG PLATINUM MINES LIMITED

MOTOTOLO MINE COMPLEX

2025 Annual Environmental Compliance Audit:

Der Brochen Amendment Project: EIAR and EMPr (Nov, 2019) and Integrated Environmental Authorisation (Nov, 2021)

Reference Number: LP 30/5/1/2/3/2/1 (0182) EM

COMPILED FOR



COMPILED BY

Report #: MOTDB04-DB-EMPR05

Report Date: 24 October 2025

J9 CC t/a J9Enviro®
✆: 083 377 7976
Registration #: 2007/243772/23
✉: jeannine@j9enviro.co.za

REPORT REVISIONS

REPORT REVISION #	DATE ISSUED	REPORT PURPOSE
MOTDB04-DB-EMPR01	13 August 2025	Draft issued for external peer review
MOTDB04-DB-EMPR02	19 August 2025	Updated Draft issued for client review
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MOTDB04-DB-EMPR04	15 October 2025	Updated Draft including RPM Legal Review
MOTDB04-DB-EMPR05	24 October 2025	Final for submission including final RPM Legal Review

DECLARATION OF INDEPENDENCE

This report was compiled by Jeannine Nienaber, Manager of J9 CC t/a J9Enviro® (J9).

This report was reviewed by Reneé Steele, Director of Steele Environmental Consulting (Steele).

J9 and Steele are both independent environmental consultants and auditors, and have performed the duties of auditors in an objective manner. Both auditors have required the expertise in conducting environmental auditing, including knowledge of the applicable environmental legislation, regulations, and guidelines. J9 and Steele have no business, financial, personal or other interest, in the operation for which they were appointed to do an assessment. There are no circumstances that may compromise the objectivity of J9, nor Steele, in performing this work.

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Signed on behalf of J9 CC t/a J9Enviro®



Jeannine Nienaber
Manager

Signed on behalf of Steele Environmental Consulting



Reneé Steele
Director

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1. INTRODUCTION

1.1 MOTOTOLO MINE COMPLEX BACKGROUND

Valterra Platinum Limited (Valterra) demerged from Anglo American plc, effective 31 May 2025. Valterra was previously known as Anglo American Platinum Limited (AAP). Rustenburg Platinum Mines Limited (RPM), a wholly owned subsidiary of Valterra, commenced planning the establishment of a new platinum group metals mine in the Der Brochen area of the Eastern Limb of the Bushveld complex in 2001. The Mototolo (*meaning mountain*) Platinum Mine was established as a 50/50 joint venture (JV) in August 2005. The joint venture was an operating mine, treating UG2 at 200 ktpm [100 ktpm from each of the two shafts, Borwa and Lebowa (*then Thorncliffe Mine shafts*)]. The planned Mototolo tailings storage facility (TSF) was moved from the originally selected farm Mareesburg 7 JT to the farm Helena 6 JT in 2005. A chrome extraction plant was authorised in 2006, within the footprint of the Mototolo concentrator. In November 2018, AAP acquired the 50% of Mototolo held by the JV partners, leading to the Mototolo JV becoming a wholly owned asset of the company. In 2020, AAP entered into a royalty mining agreement to access UG2 mining areas from Mototolo's Lebowa shaft to the north, adjacent to the Thorncliffe farm boundary.

Various studies followed with the aim of determining how best to exploit the total resource. The latest 2019-2020 Der Brochen Feasibility Study (FS) investigated the development of the infrastructure associated with the South shaft, together with ore handling systems at Der Brochen Mine. The FS was premised on the South shaft infrastructure being able to handle 200 ktpm at steady state, replacing the Lebowa shaft infrastructure, and construction is currently in progress. A decision was made in 2021 to consolidate the two operations, and the Mototolo Mine and Der Brochen Project, became the Mototolo Mine Complex (the Complex). The Complex is now fully owned and operated by RPM. The Complex is situated in the Limpopo Province of South Africa, just north of its border with Mpumalanga, about 35 km northwest of Mashishing (*formerly Lydenburg*), ~30 km northeast of Roossenekal and 30 km southwest of Steelpoort. The Complex is accessible via the R577 (*between Stofberg and Steelpoort*) via the tarred road to Mashishing, and is located on the southernmost exposure of the Eastern Limb of the Bushveld Geological Complex (***Figure 1***).

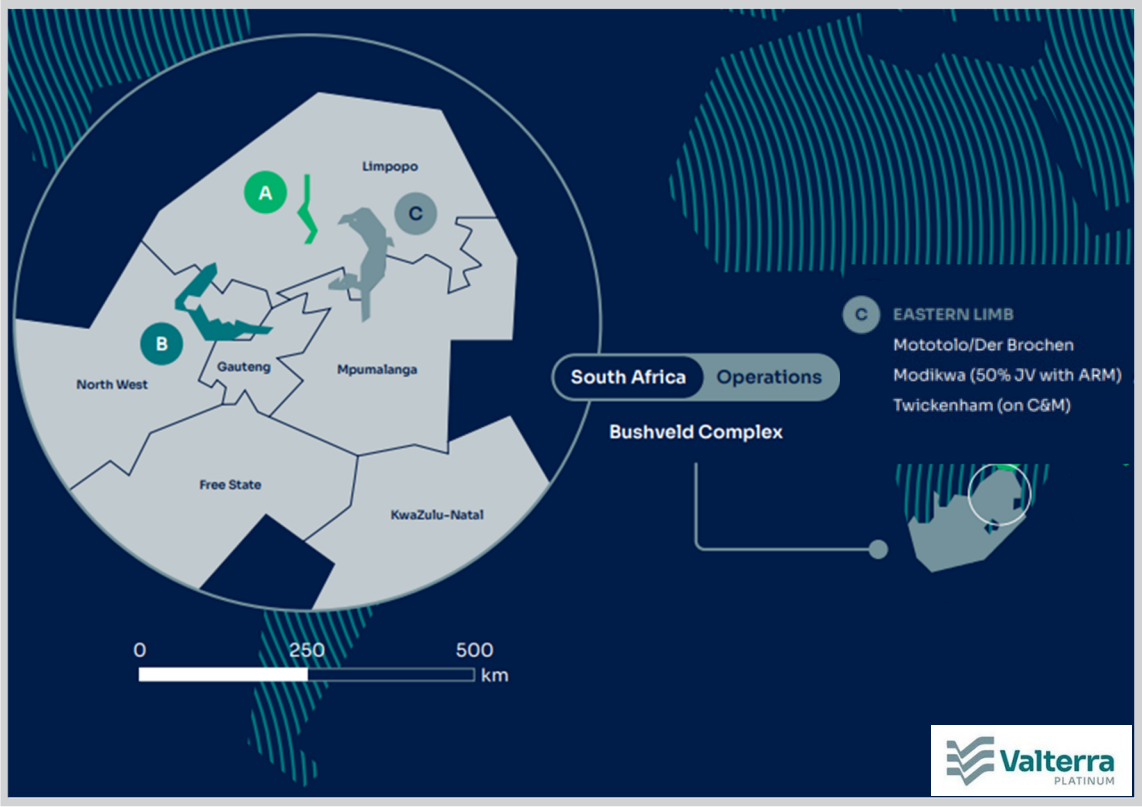


Figure 1: Location of the Mototolo Mine Complex

Figure 2 shows that the Mototolo Mine Complex comprises: the Lebowa and Borwa decline shafts, the Mototolo Concentrator and Chrome Recovery Plant, the Helena TSF (*tailings deposition has ceased*), Mareesburg TSF (*operational, with additional phases under construction*) and the Der Brochen Mine (*South Shaft Project under construction, with the initial ore being trucked to the Mototolo Concentrator for processing, and the northern area including construction activities and operational infrastructure*).

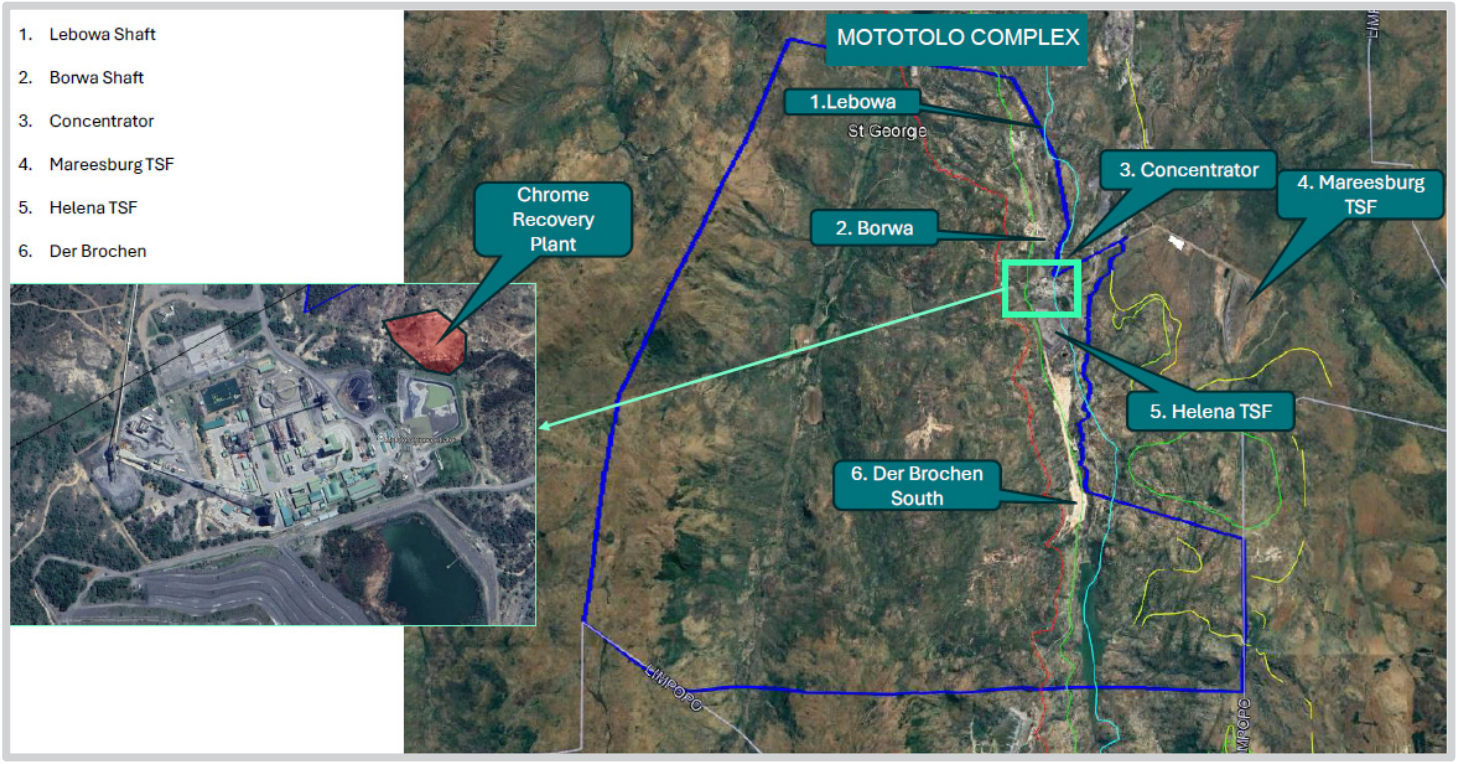


Figure 2: Mototolo Mine Complex operational areas

1.2 ENVIRONMENTAL AUTHORISATION BACKGROUND

A pre-feasibility environmental scan was conducted in August 2001 for the planned Der Brochen Mine. Seven environmental authorisations were submitted to the Department of Mineral and Petroleum Resources (DMPR) [*known as the Department of Mineral Resources and Energy (DMRE) from 29 May 2019 - 28 August 2024 and as the Department of Mineral Resources (DMR) prior to May 2019*], for various developments in the Groot and Klein Dwars River valleys, as part of the Der Brochen Mine development, between November 2002 and May 2010. The mineral right was converted to a new order mining right in terms of the Mineral and Petroleum Resources Development Act 28 of 2002 (MPRDA) in 2010 (MP 302 MR).

The DMPR issued a directive to RPM in May 2013, to align all previously approved Environmental Management Programmes (EMPrs) and consolidate them into a single document, since the commencement of the project in 2001. An Amendment to the Mining Work Programme (MWP) was submitted to the DMPR in 2014, which included an update to the Social and Labour Plan (SLP), as well as the March 2015 Consolidated Environmental Impact Assessment Report (EIAR) and EMPr. The 2015 EMPr also included new activities namely: two Open Pits (Northern and Southern Pits), re-routing of a 132 kV powerline, the raising of the existing Helena TSF, a Co-Disposal Facility (tailings disposal with a rock embankment in the north pit) and an expansion to the previously approved Mareesburg TSF and associated infrastructure. The Final March 2015 EMPr was approved by the Limpopo Department of Economic Development, Environment & Tourism (LDEDET) on 10 June 2015, followed by DMPR approval on 21 September 2016.

Changes in the Der Brochen Mine planning, required amending the above approved 2015 EIAR and EMPr, with the Der Brochen Amendment Project EIAR and EMPr submitted to the DMPR in November 2019. The changes in project description, requiring amendment, are:

- The construction of a buttress wall at the existing Helena TSF and the additional filter press plant at the existing Mototolo Concentrator Plant; and
- The development and operation of additional mining related infrastructure, namely: the South Decline Shaft with associated infrastructure (*within the previously approved Southern open pit area, thereby converting the previously approved Southern open pit mining operation to an underground mining operation*), three up-cast ventilation shafts associated with the South Decline Shaft, a Dense Medium Separation (DMS) Plant within the existing footprint of the Mototolo Concentrator (*removed from the Mine scope), a* DMS Stockpile with associated pollution control dams (PCDs) (*the DMPR were informed, in June 2025, of the name change of the DMS stockpile to the Mareesburg stockpile, as well as changes to be made regarding the use of the authorised DMS Stockpile area),* the conversion of the existing Mototolo chrome recovery plant to an inter-stage arrangement, the installation of a Mainstream Inert Grinding (MIG) mill at Mototolo Concentrator, additional Run of Mine (RoM) stockpiles and associated silos, change houses, an office complex, an explosive destruction bay, a staff accommodation camp and additional linear infrastructure, namely two conveyor systems, as well as access and haul roads.

The 2019 EMPr furthermore states that the Der Brochen Project originally included a co-disposal facility that was designed and approved for the disposal of waste rock material and tailings material, however, recent amendments to the designs and commissioning of the Mareesburg TSF, have changed the co-disposal facility to consist of a waste rock embankment with lined containment dams within the embankment facility, for the storage of raw (clean) water and dirty water as part of the mine's updated water management strategy.

The November 2019 Der Brochen Amendment Project EIAR and EMPr was approved by the DMPR on 26 November 2021.

2. LEGAL REQUIREMENTS AND SCOPE OF THE AUDIT REPORT

This audit report has been prepared in accordance with the NEMA EIA Regulations, 2014 (as amended)'s requirements for auditing (Regulation 34), with the contents being prepared in line with Appendix 7 of the Regulations, as detailed in ***Sections 2.1*** and ***2.2***.

This annual environmental compliance audit covers the above 2019 Der Brochen Amendment Project EIAR and EMPr and its associated 2021 Integrated Environmental Authorisation (IEA) - refer to ***Section 2.3*** below for a Project Description.

2.1 NEMA EIA REGULATIONS, 2014 (AS AMENDED): REGULATION 34

Regulation 34 of the NEMA EIA Regulations, 2014 (as amended): "Auditing of compliance with environmental authorisation, environmental management programme and closure plan", states:

(1) The holder of an environmental authorisation must, for the period during which the environmental authorisation, EMPr, and the closure plan in the case of a closure activity, remain valid-
  (a) ensure that the compliance with the conditions of the environmental authorisation, the EMPr, and the closure plan in the case of a closure activity, is audited; and
  (b) submit an environmental audit report to the relevant competent authority.

(2) The environmental audit report contemplated in subregulation (1) must-
  (a) be prepared by an independent person with the relevant environmental auditing expertise; (***Section 3***)
  (b) provide verifiable findings, in a structured and systematic manner, on- (***Sections 5*** and ***6***)

(i) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation, EMPr and the closure plan in the case of a closure activity; and

(ii) the ability of the measures contained in the EMPr and closure plan to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity;

(c) contain the information set out in Appendix 7; (***Section 2.2***) and

(d) be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation.(***Table 5***)

(3) The environmental audit report contemplated in subregulation (1) must determine- (***Section 6.2***)

(a) the ability of the EMPr, and the closure plan in the case of a closure activity, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility;

(b) the level of compliance with the provisions of the environmental authorisation, EMPr or closure plan.

(4) Where the findings of the environmental audit report contemplated in subregulation 1 indicate-

(a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or

(b) insufficient levels of compliance with the environmental authorisation, EMPr or closure plan;

the holder must, when submitting the environmental audit report to the competent authority in terms of subregulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report.

(5) When submitting recommendations in terms of subregulation (4), such recommendations must have been subjected to a public participation process, which process has been agreed to by the competent authority and was appropriate to bring the proposed amendment of the EMPr or closure plan, to the attention of potential and registered interested and affected parties, including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the competent authority, for approval by the competent authority.

(6) Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available-

(a) to anyone on request; and

(b) on a publicly accessible website, where the holder has such a website.

(7) An environmental audit report must contain all information set out in Appendix 7 to these Regulations. (***Section 2.2***)

2.2 NEMA EIA REGULATIONS, 2014 (AS AMENDED): APPENDIX 7

Appendix 7 defines the content of the Environmental Audit Report, as below:

1 Environmental Audit Report

The environmental audit report must provide for recommendations regarding the need to amend the EMPr and the closure plan in the case of a closure activity.

2 Objective of the environmental audit report

The objective of the environmental audit report is to-

(a) report on-

(i) the level of compliance with the conditions of the environmental authorisation and the EMPr and the closure plan in the case of a closure activity; and

(ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPr and closure plan achieve the objectives and outcomes of the EMPr and closure plan;

(b) identify and assess any new impacts and risks as a result of undertaking the activity;

(c) evaluate the effectiveness of the EMPr, and the closure plan in the case of a closure activity;

(d) identify shortcomings in the EMPr, and the closure plan in the case of a closure activity; and

(e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and the closure plan in the case of a closure activity.

3 Content of environmental audit reports

(1) An environmental audit report prepared in terms of these Regulations must contain-

(a) details of the- (***Section 3***)

(i) independent person who prepared the environmental audit report; and

(ii) expertise of the independent person that compiled the environmental audit report;

(b) a declaration that the independent auditor is independent in a form as may be specified by the competent authority; (***report sign-off page***)

(c) an indication of the scope of, and the purpose for which, the environmental audit report was prepared; (***Section 2.3***)

(d) a description of the methodology adopted in preparing the environmental audit report; (***Section 4***)

(e) an indication of the ability of the EMPr, and the closure plan in the case of a closure activity to- (***Section 6.2***)

(i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis;

(ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility in the case of a closure activity; and

(iii) ensure compliance with the provisions of environmental authorisation, EMPr, and the closure plan in the case of a closure activity;

(f) a description of any assumptions made, and any uncertainties or gaps in knowledge; (***Section 6.2***)

(g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report; (***Section 6.2***)

(h) a summary and copies of any comments that were received during any consultation process; ***(Section 6.2)*** and

(i) any other information requested by the competent authority. (***Section 6.2***)

2.3 SCOPE OF THE AUDIT REPORT

The layout of the proposed infrastructure as part of the Der Brochen Amendment Project is depicted in ***Figure 3***. The layout plan furthermore details the NEMA and NEMWA Listed Activities triggered by the various infrastructure and activities.

Figure 4 depicts the Construction Drawing for the South Shaft Layout.

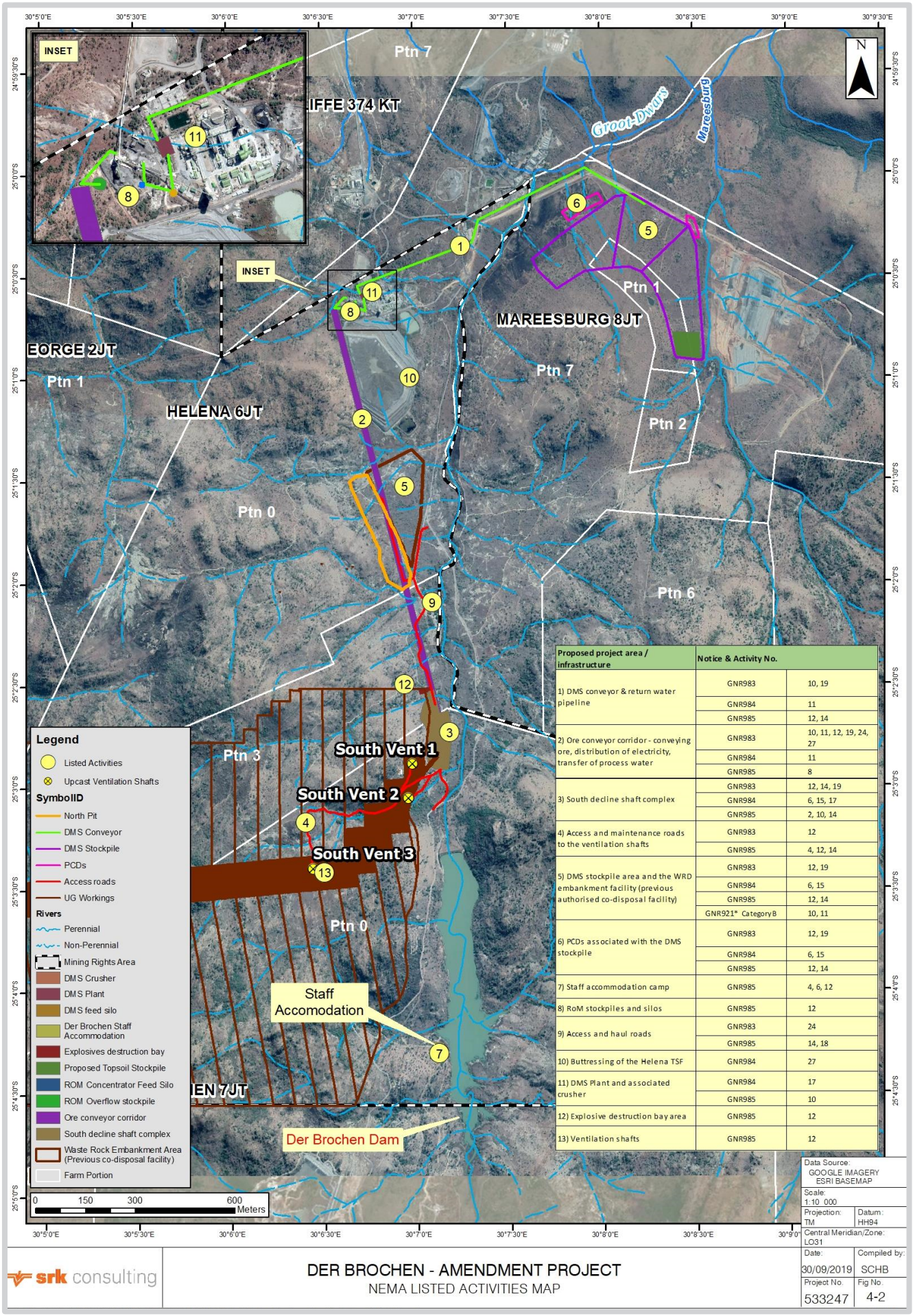
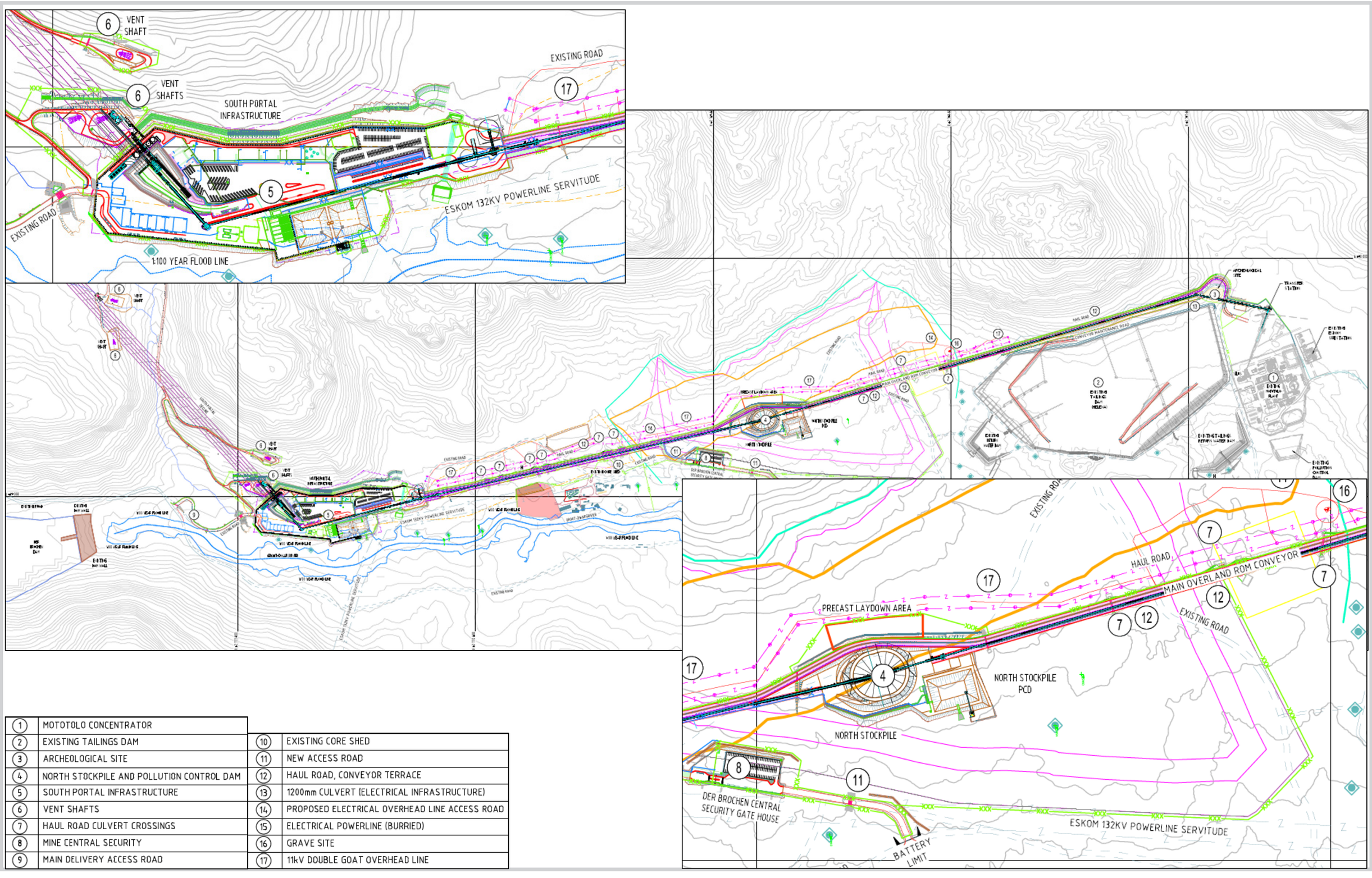


Figure 3: Der Brochen Amendment Project - infrastructure layout and Listed Activities



1	MOTOTOLO CONCENTRATOR	10	EXISTING CORE SHED
2	EXISTING TAILINGS DAM	11	NEW ACCESS ROAD
3	ARCHEOLOGICAL SITE	12	HAUL ROAD, CONVEYOR TERRACE
4	NORTH STOCKPILE AND POLLUTION CONTROL DAM	13	1200mm CULVERT (ELECTRICAL INFRASTRUCTURE)
5	SOUTH PORTAL INFRASTRUCTURE	14	PROPOSED ELECTRICAL OVERHEAD LINE ACCESS ROAD
6	VENT SHAFTS	15	ELECTRICAL POWERLINE (BURRIED)
7	HAUL ROAD CULVERT CROSSINGS	16	GRAVE SITE
8	MINE CENTRAL SECURITY	17	11kV DOUBLE GOAT OVERHEAD LINE
9	MAIN DELIVERY ACCESS ROAD		

Figure 4: Construction Drawing - Der Brochen Mine Layout Plan (DRA, 05/03/24)

This audit assessed the following currently applicable sections of the 2019 Der Brochen Amendment Project EIAR and EMPr, as well as the 2021 IEA in its entirety:

- Table 10-3: Pre-Construction activities, anticipated impacts and recommended mitigation measures:
  - Site clearing
  - Stockpiling of Topsoil
  - Use of existing gravel roads for pre-construction activities.
- Table 10-4: Construction activities, anticipated impacts and recommended mitigation measures:
  - Construction of infrastructure (conveyor belt systems, South Shaft, Ventilation shafts, and explosive destruction bay)
  - Construction of gravel maintenance roads to the proposed ventilation shafts
  - Upgrading of existing gravel roads to tar roads to serve as main access roads
  - Generation of construction waste
  - The following infrastructure has not been constructed and was not audited [DMS Plant, DMS Stockpile area and associated PCDs, and staff accommodation *(removed from the Mine scope)*].
- Table 10-5: Operational activities, anticipated impacts and recommended mitigation measures:
  - Temporary hauling of ore from shafts to Mototolo Concentrator along the corridor associated with the Ore Conveyor System (whilst conveyor system is being constructed)
  - Stockpiling of ore material at Mototolo Concentrator
  - Utilisation of storm water management and pollution control infrastructure at shafts
  - Dangerous Goods storage and handling (including hydrocarbons/chemicals/explosives).

The following EMPr Sections were not audited as the infrastructure/activities are not operational, and the Mine is under construction and has not entered any closure or post-closure phases:

- *Table 10.5: Operational activities, anticipated impacts and recommended mitigation measures:*
  - *Underground mechanised mining at South Shaft*
  - *Operation of conveyor systems*
  - *Operation of the Chrome Recovery Inter-Stage Plant*
  - Operation of the DMS Plant - *removed from the Mine scope*
  - Deposition of DMS material onto the DMS Stockpile Area - *name changed to the Mareesburg stockpile, as well as changes to be made regarding the use of the authorised DMS Stockpile area*
  - Utilisation of storm water management and pollution control infrastructure at PCDs at DMS stockpile - *removed from the Mine scope*
  - *Utilisation of the Staff Accommodation near the Der Brochen Dam*
  - *Utilisation of tar access roads*
  - *Utilisation of gravel maintenance roads associated with the ventilation shafts*
  - *Generation of waste*
- *Table 10-6: Closure activities, anticipated impacts and recommended mitigation measures - this section was not audited as the Mine is still under construction/entering operation*
- *Table 10-7: Post-closure activities, anticipated impacts and recommended mitigation measures - this section was not audited as the Mine is still under construction/entering operation.*

3. DETAILS AND EXPERTISE OF THE INDEPENDENT PERSON THAT COMPILED THE ENVIRONMENTAL AUDIT REPORT

Jeannine Nienaber, Manager of J9 since January 2008, has over 26 and a half years' experience in the environmental management, energy management and permitting fields, consulting on Valterra (*previously AAP)* Projects since 2000. Jeannine obtained her Masters degree (MSc) in Environmental Management, *Cum Laude*, from the University of Johannesburg in 1998. She is an internationally certified EMP Compliance, EMS and ISO 14001 Lead Auditor and has been a Registered Professional Natural Scientist (*PrSciNat*) since 2003.

Jeannine's involvement at Mototolo and Der Brochen commenced in 2001, with her compiling the initial base case EMPR for the Der Brochen Mine, including all the subsequent Scoping Reports, EMPrs and Amendments for the Trial Mining, Wellfields, Mototolo Helena TSF and various Der Brochen and Mototolo Projects, between 2001 and 2010. J9 was furthermore responsible for the Der Brochen Mine Richmond Trial Mining Phase and Mototolo Concentrator and Tailings Dam Environmental Performance Assessment Audit and Report. She also compile the Gap Analysis Report of the MPRDA and EMP Alignment, as part of the new order mining right conversion in 2010, followed by seven concept, pre-feasibility and feasibility environmental, sustainable development, energy and permitting reports for the various Der Brochen Projects between 2011 and 2022. J9 was appointed to compile the Mototolo Permitting Plan in 2022, as well as the Environmental Management and Permitting Investment Development Model (IDM) Study Reports for the Mototolo Off-River Pumped Hydro Storage (PHS) Concept Study between 2021 and 2022.

As stated above Jeannine became certified as an international EMP Compliance, EMS and ISO 14001 Lead Auditor, by the International Register of Certified Auditors (IRCA), in 2004. She has conducted over 180 compliance and Health, Safety, Environment and Community (HSEC) assurance audits in the mining industry for various clients over the last 26.5 years, covering most of the AAP operational sites, including Der Brochen, Mototolo and Booysendal (both when the farm was still part of the Der Brochen mining right, as well as once it was sold to Northam Platinum Limited). Jeannine also trained the top management at various Xstrata Plc' operations in conducting HSEC Assurance Audits. She has lastly been performing audit compliance inductions and training for many of Valterra's Rustenburg Base Metals Refinery (RBMR)'s contractors since 2019 to present, and has been conducting the bi-weekly environmental compliance audits for the Copper Debottlenecking Project on site at BMR since 2019 (ongoing), emphasising her auditing capabilities and experience.

4. METHODOLOGY ADOPTED IN PREPARING THE ENVIRONMENTAL AUDIT REPORT

The Pre-Audit preparation included:

- review of the 2019 Der Brochen EMPr and associated 2021 EA
- review of the 2024 external compliance audit report
- summary of all previous partial and non-compliant findings, requesting updates on these from the client, as well as to provide verification documents, evidence and information on gaps identified
- compilation of audit checklists of all relevant conditions of the 2019 EMPr to be audited on site.

An online Opening Meeting was held on Monday 23 June 2025. RPM was represented by the Environmental Team, Assurance Team and the Der Brochen Mine Team. The RPM Environmental Officer presented a description of the Der Brochen areas to be audited (***Figure 2***), including existing infrastructure and activities:

- the Der Brochen Mine will provide access to the workings via a four-decline system from surface
- ore from the Der Brochen shaft development is currently temporarily stockpiled and trucked to the Concentrator while the conveyor systems are still under construction
- infrastructures currently completed include the South Shaft clean water diversion, silt traps, mine service water dam and two PCDs
- water monitoring: monthly & quarterly water quality monitoring on groundwater, process water and surface water, and seasonal biomonitoring is undertaken
- dust fallout monitoring: conducted monthly through a dust monitoring network program
- compliance monitoring: internal & external permit audits, environmental inspections and Green flag inspections.

J9 noted that one change from the 2024 Compliance Audit was that ore was currently being trucked from the Der Brochen south shaft to the Mototolo Concentrator for processing, which was not active during the 2024 audit. J9 noted that these sections from the EMPr will be added to the audit.

The schedule for the audit was also discussed, with the Der Brochen footprint to be audited on Thursday 26 June 2025. J9 then proceeded to present:

- auditor introductions
- auditing schedule and plan (agreed with the schedule RPM presented)
- audit reporting schedule
- content of the audit (agreed with the contents RPM presented)
  - it was agreed that the Audit Period was June 2024-June 2025
- outstanding layout plans required for the site audit
- the significance rating methodology (***Table 1***) and reporting of findings (2025 results and a comparison to the 2024 compliance ratings).

The audit of the Der Brochen footprint was undertaken on 26 June 2025 by Jeannine Nienaber and Reneé Steele, as auditors and accompanied by:

- Avhashoni Mashamba - Section Manager: Environmental (Mototolo Mine Complex)
- Sharron Mkhabela - Environmental Specialist (Mototolo Mine Complex)
- Lebogang Masete - Environmental Officer (Der Brochen Mine)
- Chris Van Dyk - Lead Engineer (Der Brochen Mine)
- Gerhardus Botha - Project Manager (Der Brochen Mine)
- Stephan van As - Section Manager: Conservation (Mototolo Mine Complex).

Table 1: Audit Compliance Rating Methodology

2024 RATING	2025 RATING		DEFINITION
Take Note		**Noted**	The condition, commitment and/or mitigation measure that does not require any specific action or where no specific mitigation measures are provided for a condition.
N/A		**N/A**	A condition, commitment and/or mitigation measure that is not applicable at the time of the audit, or not relevant to the operation/project/stage/type of construction/operation, or is an old commitment that was only applicable to a previously completed project/stage/type of construction/operation and cannot be implemented nor measured, and is thus not assessed, or where changes in RPM policies/procedures required implementation of alternative measures.
Compliant		**Compliant**	Condition/mitigation measure/commitment has been achieved, with evidence provided in the form of a document or site verification.
Non-Compliance		**Non-Compliant**	The failure to comply with, or fulfil, the requirements of an applicable condition, commitment and/or mitigation measure and/or no verification, nor evidence of compliance.
Other (Corrected Finding, Observation)			

The post-audit clarifications, included the review of the site audit notes and photographic evidence, followed by an information request to the client for additional information and documents discussed on site. These documents were downloaded and reviewed. A draft report was compiled, including a photolog of evidence for the findings and to support the compliance ratings. The draft report was reviewed externally, prior to being submitted to the client for review. The updated draft report, including all the RPM environmental team's comments, was submitted to the RPM Legal team for review. The final report was updated to include all the Legal comments and submitted electronically to the RPM Environmental Manager.

5. AUDIT FINDINGS

Table 2 to ***Table 5*** detail the audit findings of the Der Brochen footprint, as audited on 26 June 2025. ***Annex 1*** contains the Photolog of Evidence with numbering referenced in the table below, as proof of the findings and audit ratings.

Table 2: Der Brochen Amendment Project EIAR & EMPr (Nov, 2019) Compliance Audit Results - Pre-Construction Activities

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
TABLE 10-3: PRE-CONSTRUCTION ACTIVITIES, ANTICIPATED IMPACTS AND RECOMMENDED MITIGATION MEASURES				
Site Clearing				
Flora: *Clearing and removal of Floral SCC, including collection of medicinal/protected floral species within the focus area*				
1	• No collection of firewood, floral SCC or medicinal floral species must be allowed by construction or mining personnel.	• The site Environmental Inductions specify that the collection of firewood and plant species are prohibited.	• Site Interviews (26/06/25)	☑
2	• During the surveying and site-pegging phase of surface infrastructure, all floral SCC that will be affected by surface infrastructure must be marked and where possible, relocated to suitable habitat surrounding the disturbance footprint. Should any floral species protected under Limpopo Environmental Management Act (LEMA) (Act 7 of 2003) and National Forest Act (Act 84 of 1998) be encountered within the proposed development footprint areas, permits should be obtained from LDEDET and DAFF to remove, cut or destroy any protected tree species before construction of infrastructure takes place.	• The Conservation Manager and Environmental Officer pegged the site footprint pre-construction. • The Conservation Manager and specialists Agreenco Environmental Projects (Pty) Ltd (Agreenco), are responsible for relocation of all floral Threatened or Protected Species (TOPS) to the Mareesburg Nursery, based on the: "*Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites*", dated Jun 2020 (2020 Master Plan) and prepared by Agreenco. • The RPM Environmental Manager and Officer obtained the permits for relocation of the species of conservation concern (SCC).	• Photo 1: Site demarcation peg • Environmental Officer interview (26/06/25) • The 2024 EMPr Compliance Audit states that site visits were conducted in May, Jun and Oct 2021 to assess the plant species diversity of the Der Brochen Phase 2 area and the required permits were obtained as a result (EnviroGistics, Nov 2024) • The 2020 Master Plan (will be updated in Q4 2025 to include all activities to date and planned future rescue areas)	☑
3	• The following protected species listed under the National Forest Act (Act 84 of 1998) were observed within the focus area at the time of the assessment: *Balanites maughamii, Catha edulis, Lydenburgia cassinoides* and *Sclerocarya birrea subsp. caffra*.	• The Environmental Team is aware of the floral TOPS on site.	• Department of Agriculture, Forestry and Fisheries (DAFF) Permit to cut, disturb, damage and destroy protected trees (2024-25), lists *Berchemia zeyheri*, *Sclerocarya birrea* and *Elaeondendron transvaalense* • DAFF Permit to cut, disturb, destroy or remove protected trees (2023-24), lists *Berchemia zeyheri, Lydenburgia cassinoides, Sclerocarya birrea* and *Elaeondendron transvaalense* (25/07/23) • Wildlife Trade and Regulation Permit: Pick protected plants on Der Brochen 7 JT: *Elephantorrhiza praetermissa*, LDEDET (12/12/22) • Wildlife and Trade Regulation Permit: Pick and Convey protected plants on Der Brochen 7 JT: *Elephantorrhiza praetermissa, Boscia foetida* and *Scadoxis puniceus* (25/02/22) • DAFF Permit to cut, destroy and/or transplant protected trees, lists *Lydenburgia cassinoides, Sclerocarya birrea* and *Elaeondendron transvaalense* (26/05/21) for the South Shaft Portal	☑
4	• Permits will be required were any of these species to be affected by the mining activities.	• Site interviews (26/06/25) confirmed that permits were obtained prior to rescue and relocation of these floral TOPS.		☑
5	• Additionally, several species listed as protected under the LEMA (Act 7 of 2003) were observed during the field assessment namely: *Aloe cryptopoda, Huernia sp., Jamesbrittenia macrantha* and *Scadoxis puniceus*.	• The 2023 Der Brochen Biodiversity Action Plan (BAP) refers to all of these floral TOPS.		☑
6	• These species will need to be rescued and relocated or, were they to be affected by the mining activities, permits should be obtained from LEDET.	• The 2020 Master Plan refers to all of these listed species and includes lessons learnt from the Mareesburg TSF Phase 1's 2017 and 2019 translocations, as well as permit requirements.		☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
7	• The mine will establish a nursery developed by the mine to cultivate indigenous/endemic and SCC plant species with focus on rehabilitation during the post closure phase in conjunction with a suitably qualified specialist.	• The Mareesburg Nursery is run by the Mototolo Complex Conservation Manager and specialists Agreenco, rescuing and cultivating SCC for rehabilitation purposes.	• Photo 2: Mareesburg Nursery visited on 26/06/25	☑
Flora: *Potential loss of floral habitat and species, including floral Species of Conservation Concern (SCC). Clearance of vegetation for placement of infrastructure within drainage lines will result in greater linear impacts downstream.* *Clearing of vegetation and site preparation associated with the proposed surface infrastructure footprints, contractor laydown areas and construction of surface infrastructure will lead to the loss of sensitive floral habitat, i.e. rocky outcrops, and species, including floral SCC. Clearing of vegetation along linear activities will lead to a loss of species, including SCC. Potential proliferation of alien and invasive floral species due to disturbance along roads.*				
8	• The mine will establish a nursery developed by the mine to cultivate indigenous/endemic and SCC plant species with focus on rehabilitation during the post closure phase in conjunction with a suitably qualified specialist.	• The Mareesburg Nursery is run by the Mototolo Complex Conservation Manager and specialists Agreenco, rescuing and cultivating floral TOPS for rehabilitation purposes.	• Photo 2: Mareesburg Nursery visited on 26/06/25	☑
9	• Proposed infrastructure areas must be optimised, ensuring that the layout footprint is as small as possible.	• The Environmental Officer assisted the Conservation Manager in the site-pegging pre-construction and monitors site creep.	• Photo 1: Site demarcation peg • Environmental Officer interview (26/06/25)	☑
10	• Mining surface infrastructure, including construction/ contractor's camps must be placed within transformed/impacted areas as far as possible.	• The temporary construction infrastructure and contractor's laydown areas have been placed within the permanent South Shaft footprint limits. • Stripped topsoil was furthermore placed on the disturbed WRD embankment facility footprint.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24) • Site interviews (26/06/25)	☑
11	• The footprint and daily operation of these structures must be strictly monitored to ensure that footprint creep and edge effects does not affect the surrounding sensitive faunal habitat.	• The Environmental Officer monitors site creep. • No disturbance outside the Mine footprint was observed.	• Photo 3: No footprint creep • Environmental Officer interview (26/06/25)	☑
12	• The footprint of the proposed infrastructure area must be clearly demarcated.	• The Environmental Officer assisted the Conservation Manager in the site-pegging pre-construction and monitors site creep.	• Photos 1 and 3 • Environmental Officer interview (26/06/25)	☑
13	• Vegetation clearing activities will be restricted to the demarcated infrastructure footprint area.	• The 2024 Compliance Audit states that site visits were conducted in May, Jun and Oct 2021 to assess the plant species diversity of the Der Brochen Phase 2 area prior to vegetation clearing, which was restricted to the footprint areas.	• Environmental Officer and Conservation Manager interviews (26/06/25) • 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024) • Photos 1 and 3	☑
14	• Vegetation clearance will be undertaken in a phased manner.	• The 2020 Master Plan shows the phased approach to vegetation clearance and rescue or floral TOPS, based on the construction schedule.	• 2020 Master Plan • Conservation Manager interview (26/06/25)	☑
15	• Construction personnel and construction vehicles should be kept to the bare minimal per site.	• Site access is restricted to the appointed Mine construction team and contractors.	• Access to Der Brochen is controlled by RPM Protection services, fencing, turnstiles, access cards and pre-booked visitors' access (Photo 4)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
16	• No uncontrolled or unsanctioned fires are allowed.	• Designated smoking areas were observed on site. • The WBHO Information Board had an RPM Fire Safety Topic for Jun 2025 displayed.	• Photo 5 • Photo 6	☑
17	• Provide fire safe zone facilities and suitable fire control measures.	• The Emergency Response Team (ERT) is responsible for fire brakes across the Mototolo Complex. The focus is on infrastructure safeguarding as well as grazing management. Annual burnt areas across the property are tracked. • Firebreaks will be burnt around the infrastructure (Conservation Manager interview on 26/06/25). • The Complex Emergency Response Management Plan addresses Fire Emergencies.	• Guidance Note on Controlled Burn and Fire Breaks (2025) • Fire Burning Permit (13/06/25) • Mototolo Complex Emergency Response Management Plan, Valterra Platinum (MOTC-SHE-EME-MAN-0001)	☑
18	• Burying or burning of any waste including rubble, domestic waste, empty containers on the site will be strictly prohibited and all construction rubble waste must be removed to an approved disposal site.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/ sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	☑
19	• The mine will implement an alien and invasive plant control plan.	• The Invasive and Alien Vegetation Procedure describes the identification of Invasive Alien Plants (IAP) through surveys, the principles of the clearing plan and implementation of the identified methods. • Various Agreenco reports provide proof of IAP eradication on the Der Brochen footprint.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Service Acceptance Letter (26/05/2025) and Progress Reports (12/09/23, 28/06/23 and 26/07/23)	☑
20	• Activities should be limited to months of low rainfall (dry season) where possible to reduce probability of potential impact.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	☑
21	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• A water truck was applying water to the bare ground during the site audit.	• Photo 8	☑
22	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
23	• The mine will implement a revegetation programme on the disturbed areas adjacent to the site clearance area.	• Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth.	• Photo 9 depicts the concurrent rehabilitation on disturbed slopes • Agreenco Progress Reports (Jan and Apr 2025)	
24	• Following completion of construction, all disturbed areas adjacent to the infrastructure will be ripped and re-vegetated with an indigenous grass mix, to re-establish a protective cover, in order to minimise soil erosion.	• The Der Brochen Environmental Team is aware of this commitment and are propagating indigenous vegetation for rehabilitation purposes.	• Photo 2: Mareesburg Nursery	
25	• All areas impacted by construction must be monitored post rehabilitation until basal vegetation cover has been re-established.	• This is already being implemented on rehabilitated areas and will be done for all construction areas post rehabilitation.	• Photo 10 shows the successful rehabilitation of the side slopes, with the basal vegetation cover re-established after two rain seasons.	
26	• Should plants not successfully establish within two growing seasons after the revegetation, new plant material should be provided.	• TOPS rescued plants and cuttings are all propagated in the nursery prior to being moved back to site during rehabilitation, which includes aftercare and replacement as required, based on lessons learnt from previous translocations and relocations.	• Photo 2: Mareesburg Nursery • Conservation Manager interview and emails • Agreenco Progress Reports (Jan and Apr 2025)	
27	• Regulated speed limits of 40km/hr must be maintained to minimize dust generation.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	
28	• Storm water management measures must be implemented at the start of the construction phase.	• WBHO drafted a Temporary Storm Water Management Plan (SWMP) for the Project in 2022 (updated 2023), specifically to address storm water management during construction. • Viewed during the site audit (26/06/25): culverts along the services corridor, gabions to prevent erosion, the south portal stormwater diversion channel and terrace stormwater drain.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Photos 11-14 show proof of implementation of the SWMP measures	
29	• A biodiversity offset strategy must be developed.	• The 2023 Der Brochen BAP does not refer to an offset strategy.	• The farm Welgevonden 9 JT was purchased by RPM as an offset option, but no offset strategy has been developed (Conservation Manager interview on 26/06/25)	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Fauna: *Clearing of faunal habitat and site preparation associated with the proposed surface infrastructure footprints, contractor laydown areas and construction of surface infrastructure. These activities will lead to loss of sensitive faunal habitat and species, including faunal SCC.* *Loss of faunal species abundance and diversity due to habitat clearing, habitat degradation and increased illegal hunting/trapping/poaching by mine personnel.* *Loss of faunal SCC due to habitat loss, decreased food resources, pollution of water resources and illegal hunting/trapping/poaching by mine personnel.*				
30	• Ensure that the ephemeral drainage lines, rocky outcrops and areas containing faunal SCC outside of the construction areas are demarcated as no-go zones for personnel and construction vehicles.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• *This commitment should be rephrased in the EMPr to signposted, as demarcation of sensitive habitats through fencing, would cause additional disturbance.*	☑
31	• Clearing of vegetation should take place in a phased manner so that faunal species are given the opportunity to naturally move off and relocate to the surrounding natural areas.	• The 2020 Master Plan shows the phased approach to vegetation clearance and rescue or floral TOPS, based on the construction schedule.	• 2020 Master Plan • Conservation Manager interview (26/06/25)	☑
32	• No indiscriminate driving through the veld is allowed. As far as possible vehicles are to utilise the existing roads. Where this is not feasible, new roads are to be in areas of existing high disturbance, and not encroach upon sensitive habitats.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Environmental Officer and Conservation Manager interviews (26/06/25) • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	☑
33	• A species rescue and removal plan will be in place and acted upon should species and SCC be observed within construction footprints, notably if these species do not self-relocate naturally. Species such as the smaller less mobile and habitat specific species such as *Chrysospalax villosus, Hadogenes polytrichobothrius* and *Python natalensis*.	• The 2024 Compliance Audit states that site visits were conducted in May, Jun and Oct 2021 to assess the plant species diversity of the Der Brochen Phase 2 area prior to vegetation clearing, which was restricted to the footprint areas.	• Agreenco Progress Reports (Jan and Apr 2025) • Various permits provided as evidence	☑
34	• No faunal species may be hunted, trapped, snared or captured for any purpose whatsoever.	• The Environmental Inductions state that harming of faunal species are prohibited.	• Environmental Officer interview (26/06/25) • 2024 External Compliance Audit finding	☑
35	• Fences and boundaries must be monitored on a weekly basis in order to locate and remove snares and traps.	• The total Complex area is divided into fence zones that are formally assessed on a quarterly basis with "hotspot" areas inspected on a bimonthly basis. *Ad hoc* inspections are also conducted as part of the day-to-day activities of the land team. Fence inspection forms are completed during this process that indicates the locality and type of maintenance and presence of snares.	• Fence Zone Map • Completed Der Brochen Mine Fence Inspection Forms • *This commitment is not feasible and should be updated in the EMPr, as perimeter fence inspections take two weeks to complete due to the extent of the property boundary.*	N/A
36	• Restrict vehicles to travelling only on designated roadways to limit the ecological footprint of the proposed development.	• The site construction team are continuously advised by the environmental department that no disturbances outside the Mine footprint is allowed.	• Environmental Officer interview (26/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Freshwater Aquatics: *Loss of freshwater resource habitat due to potential placement of PCDs and stockpiles within ephemeral drainage lines (north-eastern corner of the focus area, near the Mareesburg TSF) leading to loss of recharge of downstream systems.*				
37	• The footprint of the proposed infrastructure area must be clearly demarcated.	• The site perimeter was pegged prior to construction by the Conservation Manager and Environmental Officer.	• Site pegs (Photos 1 and 3) • Previous compliance audit report findings	☑
38	• Project related activities are to be confined to the demarcated area.	• The Environmental Officer monitors site creep. • No disturbance outside the Mine footprint was observed.	• Photo 3: No footprint creep • Environmental Officer interview (26/06/25)	☑
39	• The mine will design and construct such structures in compliance with Regulation 704.	• The Der Brochen Feasibility Study (FS) Water Management Report describes the designs in line with GN704: o stormwater channels, sumps, settling ponds, service water dam, PCD (1:50 yr flood and 0.8 m freeboard).	• Der Brochen FS Water Management Report (14/09/20) • Photo 15 is the operational mine service water dam • Photo 16 depicts the south PCD under construction • Photo 17 shows the South Mine settling ponds	☑
40	• No discharge of effluents or other forms of dirty water are permitted directly into the watercourses or their surrounding environments within the focus area.	• The South Mine Service Water Dam has an overflow towards the South Shaft PCD to prevent any environmental discharges should the need arise. • The discharge/spillage risks and the need for buffer storage capacity were also assessed in the FS.	• Der Brochen FS Water Management Report (14/09/20)	☑
41	• Dedicated parking areas for construction vehicles must be located away from the delineated watercourses and the 100m zone of regulation.	• The final construction site layout plan depicts dedicated Employee and Visitors' Parking, as well as workshop TMM parking bays and dedicated grader parking.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24)	☑
42	• No vehicles may indiscriminately be moved through the watercourses.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Environmental Officer and Conservation Manager interviews (26/06/25) • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	☑
43	• If construction activities take place during the summer rainfall period, diversion of watercourses may be necessary to enable construction. Should this be required, the diversion of flow will lead to an altered flow regime and inundation period of the reach of the Groot Dwars River downstream of the construction site. It is recommended that the diversion channel ensures that the pattern, flow and timing of the upstream area is retained through a diversion structure to the downstream reach.	• No watercourses were diverted. • The south portal clean stormwater cut-off diversion channel and terrace stormwater drain were constructed upstream of the shaft complex to divert stormwater back to the Groot Dwars River. • DWS were notified of a controlled release of stormwater at Der Brochen on 0702/25 due to lack of available storage capacity at the various dams at the Der Brochen site, resulting from excessive rainfall and groundwater recharge - the controlled discharge was necessary to avoid a dam break and uncontrolled release of water.	• Der Brochen FS Water Management Report (14/09/20) • Mototolo Complex letter to DWS: Provincial Head: Mpumalanga (07/02/25)	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
44	• Excavation within the watercourses should be limited in extent (only to what is necessary for the new culvert crossings) and the smallest construction equipment possible utilised in order to limit the impact within the active channel and to ensure that the hydrological patterns within the watercourse return to normal as soon as possible after construction.	• Excavations on site seem to have been limited only to the necessary area for the new culvert crossings.	• Site audit (26/06/25)	☑
45	• Cobbles and sediment traps must be implemented within any required diversion channel as well as downstream of the construction dewatered area in order to prevent excess silt entering the downstream reaches of the system.	• Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑
46	• The diversion sandbags utilised for the dewatered area/coffer dam should be filled with in situ material so as to prevent foreign materials being introduced into the Groot Dwars River.	• No sandbags were utilised.	• Site audit (26/06/25)	N/A
47	• Sediment traps should be constructed downstream of the construction area and spaced at 20m intervals for 60m below the construction area. Sediment traps can be created by pegging an appropriate geotextile across the entire width of the channel held down by cobbles/boulders or by geotextile wrapped hay bales spanning the width of the channel and staked into position.	• Various sediment traps were observed on site. • The WBHO Temporary Storm Water Management Plan (SWMP) refers to temporary silt traps to be installed where erosion cannot be avoided, consisting of two wooden pegs driven into the ground with geotextile wrapped around the pegs acting as a barrier to collect silt.	• Photo 12 shows the gabions under construction downstream of the Der Brochen construction area. • WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
Soils, Land Use and Land Capability: *Site preparation prior to construction of activities related to the proposed surface infrastructure and open cast mining block areas. Poor planning may potentially result in permanent loss of soil resources.* *Site preparation activities will lead to disturbance of soils suitable for grazing (Class VII) and disruption of current land uses activities (i.e. wildlife).* *Vegetation clearing within the proposed mining and infrastructure areas as part of site preparation prior to commencement mining and related of activities which will lead to soil erosion.*				
48	• The construction footprint must be kept as small as possible in order to minimise impact on the surrounding environment.	• The site perimeter was pegged prior to construction and site creep is continuously monitored.	• Site audit and interviews (26/06/25)	☑
49	• The footprint of the proposed infrastructure areas will be clearly demarcated to restrict vegetation clearing activities as far as practically possible.	• The construction team were advised that no disturbances outside the pegs were allowed.	• Site audit and interviews (26/06/25)	☑
50	• Clearing of vegetation will take place in a phased manner as to keep bare soil areas as small as possible to limit the erosion potential.	• The 2020 Master Plan shows the phased approach to vegetation clearance and rescue or floral TOPS, based on the construction schedule.	• 2020 Master Plan • Conservation Manager interview (26/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
51	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• A water truck was applying water to the bare ground during the site audit.	• Photo 8	☑
52	• All disturbed areas adjacent to the infrastructural areas can be re-vegetated with an indigenous grass mix, to re-establish a protective cover, in order to minimise soil erosion and dust emission. This can be achieved by conducting a vegetation assessment.	• The 2024 Compliance Audit states that vegetation assessments were conducted in May, Jun and Oct 2021. • Areas handed over by the construction team have been/are being rehabilitated.	• Agreenco Progress Reports (Jan and Apr 2025) • 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024) • Evidence of rehabilitation viewed during the site audit (26/06/25)	☑
53	• Soils from the infrastructure footprint must be stripped and stockpiled at a designated area.	• The Method Statement includes the construction sequence and method for soil stripping and stockpiling in the designated area (disturbed WRD embankment facility footprint - previously authorised for the co-disposal facility, which has been removed from the Mine scope)	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/21)	☑
54	• Stockpile may not exceed three (3) meters in height and will be treated with temporary soil stabilization and erosion control measures.	• Due to limited space, the topsoil stockpiles do exceed 3 m. • The Nov 2024 SRK ECO Report states that: o '…*the height of the topsoil stockpiles can be increased with immediate effect as long as no vehicles/trucks movement is allowed on previous dumped soil*.' o *The stockpile should be treated with temporary soil stabilisation methods such as the application of organic matter to promote soil aggregate formation, leading to increased infiltration rate, thereby reducing soil erosion.* o *During the next external audit process, the mine will need to highlight this change to the auditor. This change will need to be captured in the Audit Report which is submitted to the DMPR for approval.*	• Site interviews (26/06/25) • Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • The auditor was not made aware of this change during the audit, and no evidence has been supplied to confirm whether the stockpiles were stabilised and/or if the higher stockpiles are being achieved without additional impacts and without vehicles driving over existing stockpiles. • The non-compliance is thus maintained.	☒
55	• Stockpiles must be revegetated to establish a vegetation cover as an erosion control measure.	• The stockpiles are continuously being developed and used in concurrent rehabilitation, as the Mine is under construction, and are consequently not being vegetated.	• Any remaining stockpiles, post-construction, will be revegetated.	ⓘ
56	• These stockpiles will always also be kept alien vegetation free to prevent loss of soil quality.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • IAP eradication in undertaken on the Der Brochen footprint as species are identified - none have been reported on the stockpiles.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Reports (various)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
57	• Burying or burning of any waste including rubble, domestic waste, empty containers on the site will be strictly prohibited and all construction rubble waste must be removed to an approved disposal site.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/ sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	☑
Surface Water: *Reduction in water quality due to an increase in turbidity as a result of an increase in erosion from cleared areas, topsoil stockpiles or any other area where there are exposed soils can occur during storm events. Increased erosion can result in an increase in turbidity, suspended solids and sedimentation in the Groot Dwars River and tributaries (indirect and cumulative impact). Some level of sedimentation is expected to occur in the Groot Dwars River and/or Mareesburg Stream pre-development as runoff is naturally anticipated to pick up environmental debris as it crosses natural areas. The increase in turbidity/suspended solids can result in a deterioration in the water quality such that water is no longer available for use by downstream users (indirect impact).*				
58	• The footprint of the proposed infrastructure area must be clearly demarcated.	• The site perimeter was pegged prior to construction by the Conservation Manager and Environmental Officer.	• Site pegs (Photos 1 and 3) • Previous compliance audit report findings	☑
59	• Vegetation clearing activities will be restricted to the demarcated infrastructure footprint area.	• The 2024 Compliance Audit states that site visits were conducted in May, Jun and Oct 2021 to assess the plant species diversity of the Der Brochen Phase 2 area prior to vegetation clearing, which was restricted to the footprint areas.	• Environmental Officer and Conservation Manager interviews (26/06/25) • 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	☑
60	• Vegetation clearance will be undertaken in a phased manner.	• The 2020 Master Plan shows the phased approach to vegetation clearance and rescue or floral TOPS, based on the construction schedule.	• 2020 Master Plan • Conservation Manager interview (26/06/25)	☑
61	• Flood protection berms will be constructed at the area where the South Shaft and DMS Stockpile.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
62	• Erosion control measures in the form of temporary erosion prevention berms will be implemented during construction.	• The WBHO Temporary SWMP addresses the prevention and mitigation of erosion through placement of berms, as required.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
63	• Clean water diversion bunds will be constructed upstream of the construction site prior to clearing areas for new infrastructure.	• The WBHO Temporary SWMP states that the Haul Road Terrace culvert, South Shaft storm water cut off trench attenuation pond and the Haul Road culvert crossings 1-9 were implemented to divert clean water around the infrastructure and tie into the permanent site SWMP.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
64	• PCDs will be constructed downstream of the working activities to minimise uncontrolled runoff from the site.	• The PCD for the South Shaft is currently under construction downstream of the working activities. • The North PCD has been constructed and was observed to be in use at the time of the inspection.	• Photo 16	☑
65	• Areas disturbed by construction activities will be rehabilitated immediately on completion of construction of each area.	• Areas handed over by the construction team have been/are being rehabilitated as soon as accessible.	• Agreenco Progress Reports (Jan and Apr 2025) • Photos 9 and 10	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
66	• Activities will be limited to months of low rainfall (dry season) to reduce probability of potential impact.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	☑
67	• Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.	• The Hydrocarbon Management Procedure describes bund and settlement requirements. • Some compliant areas were observed: o temporary workshop is surfaced o WBHO oils storage in an impermeable container o sump at equipment washing bay o self-bunded diesel storage tank on a hardstand. • Various non-compliances were observed: o no containment or settlement facilities at the temporary workshop o washing of hydrocarbon contaminated equipment at the temporary workshop on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Compliant: o Photos 18 - 21 • Non-compliant: o Photos 22 - 27	☒
68	• Spill-sorb or a similar product will be kept on site and used to clean up hydrocarbon spills in the event that they will occur.	• The Hydrocarbon Management Procedure describes spill management. • Various spill kits were observed on the construction site (26/6/25)	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Photo 28	☑
69	• Continue with the current water quality monitoring programme.	• GCS Water and Environmental (Pty) Ltd (GCS) conducts quarterly monitoring at Der Brochen, including: groundwater levels and quality, drinking water quality, surface water flow and quality.	• 2024-2025 Water Monitoring Reports (GCS)	☑
70	• Provide enough on-site ablution, sanitation and waste management facilities.	• Male and female ablution facilities are provided throughout the site (26/6/25).	• Photo 29	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Noise: *Clearing and stripping of topsoil and vegetation with earthmoving machinery which will increase the prevailing ambient noise level in the vicinity of the footprint accordingly. Construction activities of the access roads, crushers and services at the south decline shaft which will increase the prevailing ambient noise level during the construction activities accordingly above 85.0dBA.*				
71	• Equipment and/or machinery which will be used must comply with the manufacturer's specifications on acceptable noise levels.	• The client and contractors are aware of this requirement and inspect equipment as per the Original Equipment Manufacturer (OEM) schedule.	• Site interviews (26/06/25)	☑
72	• Construction activities to take place during daytime period only.	• Construction hours are: o 07:00 - 17:00 weekdays o 07:00 - 12:00 Saturdays.	• Site interviews (26/06/25)	☑
73	• The construction area where construction is taking place will have to be declared as a noise zone should the threshold value of 85.0dBA be exceeded.	• Where noise exceeds 85 dBA on site, mandatory hearing protection signs are displayed. • Daytime noise measurements at the Der Brochen south shaft construction site boundary measured 52.4 dBA during the Sep 2024 survey (below the SANS 10103:2008 industrial limit of 70 dBA).	• Photo 30: Personal Protective Equipment (PPE) - hearing protection sign • Der Brochen Annual Noise Monitoring Report, SLR (07/10/24)	☑
74	• Appropriate hearing protection devices will have to be issued to all workers working in these areas.	• Earplugs are issued to all contractors. • Compulsory PPE is checked for the Mine Team and all visitors prior to being granted access on site.	• Site audit (26/06/25)	☑
75	• Withdraw equipment for maintenance if change in noise emission characteristics is noticeable.	• All equipment is inspected in accordance with the OEM schedule and repaired as required if out of spec.	• Site audit (26/06/25)	☑
76	• Maintain complaints and grievance register and act promptly to complaints regarding noise.	• A grievance register is kept for the Mototolo Complex, including Der Brochen. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• 2025 Mototolo Complex Grievance Register	☑
Visual: Pre-construction activities will generate visual impacts related to earthworks, vehicles/plant/machinery and workers on site. Construction visual impacts are typically limited to the immediate area surrounding the site and the construction period. Dust generated at the site (e.g. dust from earthworks and trucks travelling on haul roads and dust deposited on off-site vegetation) is visually unappealing and may further detract from the visual quality.				
77	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
78	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
79	• Ensure speed limits on all haul/internal roads are always respected.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
80	• Locate new haul roads on disturbed areas as far as possible.	• There were no existing disturbed areas prior to construction commencing. • The temporary haul road for transport of ore is within the future permanent services corridor, and will become the permanent conveyor and powerline maintenance road.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24) • Site interviews (26/06/25)	☑
Heritage: *<u>Destruction of confirmed graves:</u> DBAP 19, DBAP 33, DBAP 43, DBAP 44, DBAP 51 and DBAP 52 are either confirmed graves and cemeteries based on their appearance and characteristics or sites where possible graves are located which had been corroborated by prior stakeholder engagement as graves. Additionally, these sites are also all located within the proposed development footprints.*				
81	• The mine will consider amending the development footprint to allow for the in-situ preservation of these sites.	• The Conservation Manager advised that all Cultural Heritage observations with assigned cultural significance of medium or higher are demarcated on the online GIS platform. Observations that are recorded as burial grounds and graves have a 100 m stand-off area zone, and others a 50 m stand-off area. Treatment plans (i.e., any physical mitigation such as grave relocation and Phase 2 archaeological assessments) are only implemented where the minimum stand-off areas cannot be maintained due to operational requirements. The online GIS inventory is consistently used to inform planning and monitor possible operational impacts. • DBAP 19 is not directly impacted by the optimised Der Brochen Mine footprint, with DBAP 33, DBAP 43, DBAP 44, DBAP 51 and DBAP 52 all in the proposed DMS stockpile footprint (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*).	• Conservation Manager interviews and follow-up emails	ⓘ
82	• However, should it not be possible to preserve these sites in situ, a grave relocation process must be undertaken.			ⓘ
83	• A grave relocation process will comprise of the following steps: o A detailed social consultation process, at least 60 days in length, comprising the attempted identification of the next-of-kin in order to obtain their consent for the relocation. o Bilingual site and newspaper notices indicating the intent of the relocation. o Permits from all the relevant and legally required authorities. o An exhumation process that keeps the dignity of the remains and family intact. o An exhumation process that safeguards the legal rights of the families as well as that of the mining company. o The process must be done by a reputable company well versed in the mitigation of graves.			ⓘ ⓘ

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Heritage: *<u>Potential disturbance of graves:</u> DBAP 11, DBAP 15B, DBAP 15C and DBAP 21 are applicable. DBAP 11 comprises a cemetery that is located no more than 7m west of the proposed North Pit area. The unmarked stillborn graves located at DBAP 15B and DBAP 15C are located no more than 6m and 27m from the proposed North Pit area respectively. DBAP 21 comprises a cemetery which is located 32m west of the actual conveyor footprint and 12m from the buffer area around the conveyor footprint.* *Although these grave sites are not located within any of the proposed development footprint areas, their close proximity is of concern. During the pre-construction phase there is a risk that these graves may be disturbed or destroyed if pre-construction activities are not managed properly within the demarcated development areas.*				
84	• The mine will consider amending the development footprint to allow for the in-situ preservation of these sites.	• The Der Brochen Mine optimised the south shaft design in 2021, leading to a reduced box cut size, reduced south shaft terrace size, movement of vent shaft 1 and 3 infrastructure into the terrace and an optimised services corridor. • The optimisation led to increased buffer zones between the identified burial grounds and graves: o DBAP 11: 146 m - 153 m o DBAP 15B: 244 m - 260 m o DBAP 15C: 275 m - 292 m o DBAP 21: 20 m - 41 m.	• PGS Heritage (PGS) letter to the South African Heritage Resources Agency (SAHRA) on 24/11/21 • Photo 31: DBAP 11 • Photo 32: DBAP 15 • Photo 33: DBAP 21	☑
85	• However, should it not be possible to preserve these sites in situ, a grave relocation process must be undertaken.	• The PGS Reports describe the grave relocation process of 8 graves at DBAP21. • 1 grave was relocated on 30/09/22 and 3 graves on 26/08/24.	• PGS Reports (21/10/22 and 15/10/24) • Photo 33	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
86	• A grave relocation process will comprise of the following steps: o A detailed social consultation process, at least 60 days in length, comprising the attempted identification of the next-of-kin in order to obtain their consent for the relocation. o Bilingual site and newspaper notices indicating the intent of the relocation. o Permits from all the relevant and legally required authorities. o An exhumation process that keeps the dignity of the remains and family intact. o An exhumation process that safeguards the legal rights of the families as well as that of the mining company. o The process must be done by a reputable company well versed in the mitigation of graves.	• The PGS grave relocation process involved: o stakeholder engagement (SE) process was conducted to try and identify the buried individuals o all necessary permissions for exhumation and re-internment from the affected families: SAHRA permits, Request for Grave Relocation Form, Affidavit with ID Copy, next-of-kin (NoK) Nomination Form, Notice of Exhumation Letter, Wake Fee Proof of Payment and Field Exhumation Form o notification and schedule were shared with the governing authorities two weeks in advance to ensure a South African Police Service (SAPS) officer and Environmental Health Practitioner (EHP) were available during the exhumation proceedings o meetings were arranged with the individual family representatives two weeks in advance so that the notice and schedule for their date of proceedings were explained and signed o after the reburial of the remains in the St. George's cemetery, as requested by the NoK, each new grave was marked with a grave marker containing the name of the deceased (if available) and the old grave number (where applicable), for reference purposes. The St. George's Cemetery committee (CPA) allocated new grave numbers to the burials.	• PGS Reports (21/10/22 and 15/10/24)	☑
87	• Before construction commences, the sites must be fenced. At DBAP 25 this fencing must be undertaken in such a way that the closest distances between the visible grave dressings and the fence are always at least 5m.	• Interviews with the Conservation Manager (26/06/25) confirmed that fencing of all grave sites will cause additional disturbance in a Critical Biodiversity Area, endangered ecosystem, the Sekhukhuneland Centre of Endemism and potential floral endemics and TOPS.	• Conservation Manager interviews (26/06/25) • *This commitment should be updated in the EMPr to specify demarcation on the construction drawings and signposted on site, as demarcation of sensitive areas through fencing, would cause additional disturbance*	N/A
88	• As the two graves at DBAP 15 are unmarked, it recommended that the three buildings from site DBAP 15 numbered for the purposes of this report as DBAP 15A, DBAP 15B, and DBAP 15C, be fenced.	• Interviews with the Conservation Manager (26/06/25) confirmed that fencing of all grave sites will cause additional disturbance in a Critical Biodiversity Area, endangered ecosystem, the Sekhukhuneland Centre of Endemism and potential floral endemics and TOPS.	• Conservation Manager interviews (26/06/25) • *This commitment should be updated in the EMPr to specify demarcation on the construction drawings and signposted on site, as demarcation of sensitive areas through fencing, would cause additional disturbance* • Photo 32	N/A

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
89	• As the graves at DBAP 15B and DBAP 15C are unmarked, the fence must be erected in such a way that the closest distance between these two unmarked graves and the fence enclosing all the three buildings are at least 10m.	• Interviews with the Conservation Manager (26/06/25) confirmed that fencing of all grave sites will cause additional disturbance in a Critical Biodiversity Area, endangered ecosystem, the Sekhukhuneland Centre of Endemism and potential floral endemics and TOPS.	• Conservation Manager interviews (26/06/25) • *This commitment should be updated in the EMPr to specify demarcation on the construction drawings and signposted on site, as demarcation of sensitive areas through fencing, would cause additional disturbance* • Photo 32	N/A
90	• Signposts must be erected that clearly indicates the fenced area as a cemetery. The position of the cemetery at DBAP 25 and the unmarked graves at DBAP 15 must be shown on all the construction and operation maps to ensure that all individuals associated with construction and mining activities are aware of the presence of these sites.	• DBAP 25 is not currently affected. • The Der Brochen Mine optimised the South Shaft design in 2021, leading to a reduced boxcut size, reduced South Shaft terrace size, movement of vent shaft 1 and 3 infrastructure into the terrace and an optimised services corridor. • The optimisation led to increased buffer zones between the identified burial grounds and graves, requiring no mitigation: o DBAP 15B: 244 m - 260 m o DBAP 15C: 275 m - 292 m.	• PGS letter to SAHRA (24/11/21) • Photo 32	N/A
Heritage: *<u>Destruction of heritage site and potential disturbance of grave:</u> DBAP 9 comprises a historic black homestead where graves are also buried. Although the homestead is located partially within the footprint of the Explosive Destruction Bay, the graves are located outside the footprint area.*				
91	• The mine will undertake a social consultation process to assess whether any local residents or the wider public is aware of the presence of graves on the sites.	• The Conservation Manager advised that all Cultural Heritage observations with assigned cultural significance of medium or higher are demarcated on the online GIS platform. Observations that are recorded as burial grounds and graves have a 100 m stand-off area zone, and others a 50 m stand-off area. Treatment plans (i.e., any physical mitigation such as grave relocation and Phase 2 archaeological assessments) are only implemented where the minimum stand-off areas cannot be maintained due to operational requirements. The online GIS inventory is consistently used to inform planning and monitor possible operational impacts. • DBAP 9 is not directly impacted by the optimised Der Brochen Mine footprint.	• Conservation Manager interviews and follow-up emails	ⓘ
92	• The confirmed positions of all unmarked stillborn graves and graves must be fenced, signposted and plotted on all project and construction maps.			ⓘ
93	• The required mitigation measures as outlined for historic black homesteads regarding unmarked stillborn graves must also be undertaken.			ⓘ

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Heritage: *<u>Destruction of unconfirmed graves:</u> DBAP 53 comprises a stone enclosure which may have had a military association in the past. This site is located within the footprint area of the proposed DMS stockpile.*				
94	• An archaeological site layout plan must be compiled using accepted archaeological techniques. Furthermore, the site must be cleared of vegetation and both recorded and photographed.	• The Conservation Manager advised that all Cultural Heritage observations with assigned cultural significance of medium or higher are demarcated on the online GIS platform. Observations that are recorded as burial grounds and graves have a 100 m stand-off area zone, and others a 50 m stand-off area. Treatment plans (i.e., any physical mitigation such as grave relocation and Phase 2 archaeological assessments) are only implemented where the minimum stand-off areas cannot be maintained due to operational requirements. The online GIS inventory is consistently used to inform planning and monitor possible operational impacts. • DBAP 53 is not directly impacted by the optimised Der Brochen Mine footprint, as it is located at the DMS footprint (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*).	• Conservation Manager interviews and follow-up emails	
95	• Archival and historical research must be undertaken to attempt to obtain information with which the site can better be interpreted.			
96	• A permit application to SAHRA for archaeological mitigation to take place.			
97	• Once the permit is received, limited archaeological mitigation may be undertaken. This will likely take the form of using a metal detector to screen the site for metal artefacts as well as the excavation and archaeological screening of soil from within the stone enclosure. As no archaeological deposit per se is expected to be located here, these measures will be aimed at obtaining information with which the site can be better interpreted.			
98	• An archaeological mitigation report must be compiled.			
99	• A destruction permit application must be lodged with SAHRA to allow for the destruction of the site.			
Heritage: *<u>Destruction of heritage site:</u> DBAP 38 comprises stonewalling and structures that can in all likelihood be associated with both the Late Iron Age and Historic Period. The possible presence of graves can also not be excluded.* *<u>Destruction of heritage site:</u> Site DBAP 7 comprises a low-density surface scatter of Middle Stone Age lithics and is located within the proposed development footprint areas.*				
100	• The mine will undertake a social consultation process to assess whether any local residents or the wider public is aware of the presence of graves here. o Outcome 1: The social consultation absolutely confirms that no graves are located here. o Outcome 2: The social consultation absolutely confirms that graves are located here. o Outcome 3: The social consultation does not yield any confident results.	• DBAP 38 is located at the proposed DMS stockpile area (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*) and is thus not currently affected.	• EMPr, 2019: Figure 9-26: Identified Heritage Sites • South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24)	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
101	• A permit application to SAHRA for archaeological mitigation to take place.	• DBAP 38 is located at the proposed DMS stockpile footprint (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*) and is thus not currently affected.	• Document review and interviews with environmental personnel	
102	• Once the permit is received, a surface collection of the potsherds from each site can be made.			
103	• Limited archaeological test excavations may also be required, should a deposit be identified.			
104	• An archaeological mitigation report must be compiled. The completed mitigation report must be submitted to the relevant heritage authorities.	• A specialist archaeological assessment was conducted at DBAP 7 in Nov 2020, following the findings during the 2019 HIA, which rated the site as Medium Significance and as Generally Protected B (GP.B) (PGS 2019a: 74) and concluded: o A fairly low-scale utilisation of resources is reflected by the relatively low numbers of lithics and restricted range of formal tool types o the lithic occurrences of the property under review were adequately recorded and assessed during the 2019 HIA, the subsequent site survey during Nov 2020 and reported by a Stone Age specialist o no further mitigation actions are required o in the event that construction activities do reveal subsurface lithics, PGS should be informed.	• Specialist report on the Stone Age occurrences at Der Brochen Site DBAP 7 (16/11/20)	
105	• Should graves be confirmed on any of these sites, a grave relocation process will comprise of the following steps: o A detailed social consultation process, at least 60 days in length, comprising the attempted identification of the next-of-kin in order to obtain their consent for the relocation. o Bilingual site and newspaper notices indicating the intent of the relocation. o Permits from all the relevant and legally required authorities. o An exhumation process that keeps the dignity of the remains and family intact. o An exhumation process that safeguards the legal rights of the families as well as that of the mining company. o The process must be done by a reputable company well versed in the mitigation of graves.	• DBAP 38 is located at the proposed DMS stockpile footprint (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*) and is thus not currently affected.	• EMPr, 2019: Figure 9-26: Identified Heritage Sites • South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24)	

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Heritage: *Complete destruction of three sites containing potsherd scatters and which may be surface indications for unmarked graves. DBAP 18, DBAP 20, DBAP 34 and DBAP 35 comprise of surface scatters of potsherds which can either be associated with the Late Iron Age or Historic Period. The possibility of such potsherd scatters providing surface indications for the presence of unmarked Pedi graves.*				
106	• The mine will undertake a social consultation process to assess whether any local residents or the wider public is aware of the presence of graves here o Outcome 1: The social consultation absolutely confirms that no graves are located here. o Outcome 2: The social consultation absolutely confirms that graves are located here. o Outcome 3: The social consultation does not yield any confident results.	• The Conservation Manager advised that all Cultural Heritage observations with assigned cultural significance of medium or higher are demarcated on the online GIS platform. Observations that are recorded as burial grounds and graves have a 100 m stand-off area zone, and others a 50 m stand-off area. Treatment plans (i.e., any physical mitigation such as grave relocation and Phase 2 archaeological assessments) are only implemented where the minimum stand-off areas cannot be maintained due to operational requirements. The online GIS inventory is consistently used to inform planning and monitor possible operational impacts. • DBAP 18, DBAP 20, DBAP 34 and DBAP 35 are not directly impacted by the optimised Der Brochen Mine footprint.	• Conservation Manager interviews and follow-up emails	
107	• A permit application to SAHRA for archaeological mitigation to take place.			
108	• Once the permit is received, a surface collection of the potsherds from each site can be made.			
109	• Limited archaeological test excavations may also be required, should a deposit be identified.			
110	• An archaeological mitigation report must be compiled. The completed mitigation report must be submitted to the relevant heritage authorities.			
111	• Should graves be confirmed on any of these sites, a grave relocation process will comprise of the following steps: o A detailed social consultation process, at least 60 days in length, comprising the attempted identification of the next-of-kin in order to obtain their consent for the relocation. o Bilingual site and newspaper notices indicating the intent of the relocation. o Permits from all the relevant and legally required authorities. o An exhumation process that keeps the dignity of the remains and family intact. o An exhumation process that safeguards the legal rights of the families as well as that of the mining company. o The process must be done by a reputable company well versed in the mitigation of graves.	• The online GIS inventory is consistently used to inform planning and monitor possible operational impacts.	• Conservation Manager interviews and follow-up emails	

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Heritage: *<u>Complete destruction of two Late Iron Age stonewalled sites:</u> DBAP 48 and DBAP 50 comprise Late Iron Age stonewalled settlements located within the proposed development footprint areas.*				
112	• An archaeological site layout plan must be compiled using accepted archaeological techniques.	• The Conservation Manager advised that all Cultural Heritage observations with assigned cultural significance of medium or higher are demarcated on the online GIS platform. Observations that are recorded as burial grounds and graves have a 100 m stand-off area zone, and others a 50 m stand-off area. Treatment plans (i.e., any physical mitigation such as grave relocation and Phase 2 archaeological assessments) are only implemented where the minimum stand-off areas cannot be maintained due to operational requirements. The online GIS inventory is consistently used to inform planning and monitor possible operational impacts. • DBAP 48 and DBAP 50 are not directly impacted by the optimised Der Brochen Mine footprint, as they are located at the DMS footprint (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*).	• Conservation Manager interviews and follow-up emails	
113	• During the recording of the archaeological site layout plan, an attempt must be made to identify any archaeological middens associated with these sites. Should such middens be identified, archaeological test excavations would be required. If no such middens are found, the next two mitigation measures comprising an archaeological excavation permit application and archaeological test excavations would not be required.			
114	• A permit application to SAHRA for archaeological test excavations to take place.			
115	• Once the permit is received, limited archaeological test excavations may also be required, should a deposit be identified.			
116	• An archaeological mitigation report must be compiled.			
117	• A destruction permit application must be lodged with SAHRA to allow for the destruction of the site.	• The online GIS inventory is consistently used to inform planning and monitor possible operational impacts.	• Conservation Manager interviews and follow-up emails	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Social: *<u>Influx of job seekers into the study area.</u> There is a likelihood that job seekers will move into the study area and seek accommodation in the villages located near the mine (specifically the Pakaneng Village and Kalkfontein). This may cause conflict with existing community members who currently feel that they have not been fairly considered for job opportunities at the mine.*				
118	• Anglo will consider the establishment of a Community Monitoring Forum (CMF) in order to monitor the construction phase and the implementation of the recommended mitigation measures. The CMF will include the following: o Enforcing local employment far as practically possible. o Avoid the establishment of camps, hostels or temporary accommodation for workers. Assist employees (non-local) with suitable employment in the surrounding the area. o Provide employees with adequate health support from the project team for work-related health problems, including the dissemination of the Health and Safety Policy - including HIV/AIDS policy, and any awareness training required as part of the general employment contract with contract or permanent staff.	• The Social Performance (SP) Team attends various community forums. • The RPM Mototolo Mine Contractor Recruitment Process outlines their approach to social management and monitoring of contractors as part of the social responsibility they conduct in their operations and to their stakeholders and addresses: o the area of influence (AOI) o only if the contractor can demonstrate that they are unable to source the required skills locally will they be allowed to employ a person from outside the AOI o SP will not sign off on the pre-approval onboarding form if this process has not been followed. • Proof of Platinum Health HIV/AIDS pamphlets and talk topics were provided to the auditor, which include contact numbers of councillors and Mental Health Services.	• Site interviews • RPM Mototolo Mine Contractor Recruitment Process • Platinum Health pamphlet: Adjusting to Life with HIV • Platinum Health pamphlet: How to navigate your relationship	☑
Social: *<u>Creation of employment and income.</u> Prior to the construction phase, contractors will be employed to undertake the required site preparation activities in line with the development plan. This creation of employment will be short term, for the duration of the pre-construction and construction phases.*				
119	• Emerging employment opportunities should be targeted at local residents as well as people from the surrounding communities in cases where the skills cannot be obtained from immediately adjacent communities.	• The RPM Mototolo Mine Contractor Recruitment Process outlines their approach to social management and monitoring of contractors as part of the social responsibility they conduct in their operations and to their stakeholders and addresses: o the AOI o only if the contractor can demonstrate that they are unable to source the required skills locally will they be allowed to employ a person from outside the AOI o SP will not sign off on the pre-approval onboarding form if this process has not been followed.	• RPM Mototolo Mine Contractor Recruitment Process	☑
120	• Recruitment of labour should be guided by Anglo's recruitment policies which should promote the employment of local labour by any appointed contractors.			☑
121	• Anglo should ensure that a transparent process of employment is followed to limit opportunities for conflict situations. The support of local business and the use of their products and services should be promoted as far as possible.	• The RPM Mototolo Mine Contractor Recruitment Process includes, in addition to the above: o job adverts (reviewed and placed by SP for 14 days) o review of CVs, with instruction that priority must be given to candidates from communities in the AOI o in-person and online sign-off for each candidate.	• RPM Mototolo Mine Contractor Recruitment Process	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Social: *<u>Stakeholder concerns regarding insufficient women in the workplace (gendered division of labour).</u> Women still face barriers to entering and participating in the mining sector even though South African legislation compels companies to employ women at all levels. Der Brochen's Human Rights Due Diligence (HRDD) report also identified unfair employment practices as human rights infringements, and this includes women. According to the Der Brochen SLP, at the end of June 2018, Der Brochen employed 158 people, 45 of which were women (28%). Most of these women were in semi-skilled and junior positions. Gender equality needs to be considered in the planning phase of the project to ensure that equal employment outcomes for both women and men and to ensure that women are also employed in management positions at the mines.*				
122	• Der Brochen's HR policy will support preferential employment opportunities for women, as well as measures to increase accessibility and safety considerations for women working in mines. Training and skills development focused on women will take place to increase their participation in the labour force.	• The 2021-2025 Mototolo Complex SLP includes planned adult education and training (AET) target for women (full time and part time employees, as well as full time community members). • It also states that 25% of the HSDA bursaries will be reserved for black women. • Implementation is reported annually to the DMPR and was observed on site. • The 2025 SLP Implementation Plan furthermore includes the targets and action plans for female representation at Mototolo Complex.	• Mototolo Der Brochen Mine Complex SLP, 2021-2025 • Site audit observations (26/06/25) • 2025 SLP Implementation Plan - Mototolo Complex	☑
123	• Continue the implementation of the management measures provided in the HRDD report, with HR input, to ensure equitable remuneration packages for women and their male counterparts. Institute a well-designed gender equality strategy for the project.	• The SLP describes Human Resource Development (HRD) as critical to achieving employment equity targets. • Equity targets are aligned to the Mining Charter 2018 targets and to the transitional arrangements submitted to the DMPR in 2019. • The SLP Implementation Plan shows the HR Development targets and progress between 2021-2025.	• Mototolo Der Brochen Mine Complex SLP, 2021-2025 • 2025 SLP Implementation Plan - Mototolo Complex	☑
Social: *<u>Perceived lack of coordinated disclosure of the Der Brochen project activities.</u> Proposed projects and developments often generate uncertainty, anxiety or fear due to lack of communication between the project, especially the Social Performance (SP) team and the communities. Perceived lack of information provided to the local communities by the SP team, especially with regards to employment and procurement opportunities has led to the erosion of trust, which affects the communities attitude towards the project, and Anglo operations in general. The capacity of the SP team is also inadequate to ensure proper, consistent and continuous engagement with stakeholders. Currently Der Brochen SP team consists of two team members, with one off-site support personnel, to engage with a total of 26 key villages spanning over a 30km radius.*				
124	• Der Brochen Mine has an existing Stakeholder Engagement Plan (SEP), 2018, which provides for engagement protocols for their stakeholders.	• The Mototolo Complex SEP covers the Der Brochen Mine. • The aim of the SEP is to provide a framework to manage effective and purposeful engagement with the operation's stakeholders.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025 (25/10/24)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
125	• The SEP provides a platform for engagement with the surrounding communities and stakeholders, as well as issues of priorities for such stakeholders. Strengthen the capacity of the SP team to ensure proper engagement with stakeholders on a continuous basis to ensure that all stakeholder concerns and inputs are taken into consideration, especially for vulnerable groups.	• The SEP will guide continuous engagements with the site's stakeholders, outline the stakeholder analysis, and identify stakeholder engagement objectives and priorities as well as internal actions and responsibilities related to stakeholder engagement. The SEP will also identify and guide which key external stakeholders will be prioritised for engagements based on impacts, risks, proximity, and regulatory requirements. • The SEP ensures that interested and affected stakeholders, including vulnerable sub-groups, are kept informed. • The Mototolo Social Performance (SP) team is responsible for implementation of this SEP.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025 (25/10/24)	☑
Social: *Perceived lack of support to local communities, especially women and youth to enable them to access opportunities at the mine. During focus group discussions, most of the community members had concerns regarding the mine's inability to build their capacity, especially with regards to training provision by the mine. Furthermore, stringent entry level requirements for employment were identified by community members as a way of deterring them from accessing opportunities. Currently the minimum requirement for Grade 12 and a significant number of the surrounding communities do not fulfil this requirement nor do they have any practical skills training which would be required by the mine. This reduces their chances of gaining employment at Der Brochen.*				
126	• The Der Brochen SLP makes provision for training of existing employees, and not local communities. However, based on the lack of availability of skilled labour force in the area, Der Brochen has made opportunities available for communities to attend Adult Education and Training (AET), with a view to increasing their literacy levels.	• The SLP Implementation Plan includes a Local Economic Development (LED) budget, which makes provision for education and skills training. • The SLP Implementation Plan's HRD budget specifically for community members include: internship, portable skills training (cadetships and hospitality skills), learnerships and AET.	• 2025 SLP Implementation Plan - Mototolo Complex • *This EMPr commitment should be updated*	☑
127	• The SLP also makes provision for engineering learnerships programmes for local youth, whereby they can get on the job training at the mine and where opportunities exist, they can be absorbed.	• The SLP refers to one of the Zimele programme's key programmes being: "Youth Development through increased youth workforce readiness: Build capacity of local youth, such that they are able to start a new business, increase sales of an existing business or gain formal employment. This will support jobs via direct placement in industries that go beyond mining". • The SLP Implementation Plan tracks the learnerships for local communities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025 (25/10/24) • 2025 SLP Implementation Plan - Mototolo Complex	☑
128	• Information regarding these opportunities (how many people, from which communities, progress on learnerships) will be communicated to stakeholders through existing forums to clear any misconceptions.	• The SEP shows the SP team's engagements with the various community forums.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025 (25/10/24)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
129	• It is furthermore advised that recognition of prior learning and training take place for all applicants with the relevant skills, but who may not have the necessarily qualifications.	• One of the SLP Commitments is: "Skills assessments and written recognition of prior learning, experience and qualifications". • All employees who register for AET are assessed through a recognition of prior learning process and the most appropriate placement level from which to begin further studies is recorded.	• Mototolo Der Brochen Mine Complex SLP, 2021-2025	☑
Social: *Impact on the physical quality of the living environment due to construction activities. Clearing activities have the potential to create pollution or environmental degradation. Impacts such as noise, odour and dust have an impact on social well-being of society.*				
130	• Implement social incident management procedure including the existing grievances to capture community and stakeholder concerns and grievances regarding environmental impacts.	• The Incident Management Procedure addresses social incidents and grievances and steps to manage these. • A grievance register is kept for the Mototolo Complex, including Der Brochen.	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • 2025 Mototolo Complex Grievance Register	☑
131	• Bonfires and burning of waste materials will be prohibited.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/ sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	☑
132	• Where practicable, stockpiles of soils and materials will be located as far as possible from sensitive receptors, taking account of prevailing wind directions and seasonal variations in the prevailing wind.	• The soil stockpiles were placed in the disturbed WRD embankment facility footprint (previously demarcated for the co-disposal facility, which has been removed from the Mine scope). • The closest residential area is 10 km north-west of DB (EMPr, 2019).	• Site interview (26/06/25) • Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019)	☑
133	• Wherever feasible, construction traffic will avoid sensitive roads (residential roads, congested roads, via unsuitable junctions, etc.) and that vehicles are kept clean and sheeted when on public roads.	• Construction vehicles are restricted to the main access and haul roads.	• Site interviews and audit observations (26/06/25)	☑
134	• Timing of any large-scale vehicle movements to avoid peak hours on the local road network would also be beneficial.	• A traffic specialist study was conducted as part of the impact assessment phase (EMPr, 2019). • This condition is noted.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019)	ⓘ
135	• Vehicle speeds (especially on unpaved roads) will be reduced to limit the re-entrainment of dust. Implement Der Brochen's Emergency Preparedness Plan to communicate with communities regarding ways in which to respond during emergencies.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions • The Mototolo Complex External Emergency Management Plan address various emergencies and the affected/vulnerable communities.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations • Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Social: *Loss of cultural heritage. During clearing of land in preparation for construction, cultural heritage chance-finds (unmarked graves, archaeological tools etc) could be exposed.*				
136	• Residents and landowners should inform mitigation measures when addressing any potential impact on cultural heritage sites.	• The PGS grave relocation process, for graves relocated on site, involved a detailed stakeholder engagement (SE) process, with extensive involvement of the next-of-kin (NoK) in the mitigation measures.	• PGS Reports (21/10/2022 and 15/10/2024)	☑
137	• Implement the existing chance finds procedure to deal with how to project graves and heritage sites accidentally unearthed during construction.	• The Cultural Heritage and Chance Find Procedure defines the appropriate cultural heritage chance find (CF) response guidelines consistent with RPM Standards and in accordance with international standards of good practice.	• Mototolo Complex Cultural Heritage Chance Find Procedure (MOTC-ALL-SER-PRO-0004)	☑
Social: *Health and social well-being. Construction-related public health impacts due to dust/air pollution and noise pollution associated with land clearing are possible.*				
138	• Environmental pollution (noise, dust, etc.) must be limited as far as possible and the requirements of the EMP be implemented to reduce the impact on surrounding residents.	• Noise monitoring is undertaken at the Der Brochen South Shaft construction site boundary. • Equipment is maintained as per the OEM schedule. • Where noise exceeds 85 dBA on site, mandatory hearing protection signs are displayed. • Evidence of wet suppression during the site audit.	• Der Brochen Annual Noise Monitoring Report, SLR (07/10/24) • Photo 30 - PPE - hearing protection sign • Photo 8 - dust suppression on site	☑
139	• The necessary safety precautions will be taken, and first aid supplies will be made available on site.	• The Mototolo Complex has various Safety and Health Procedures addressing safety precautions and first aid, such as the External Emergency Management Plan. • Safety signage, emergency contact numbers, responsible first aiders on site with contact details, were all observed on site during the audit.	• Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001) • Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic • Photo 35: WBHO Laydown designated walkway, Fire Safety Rules Sign and Fire Extinguisher • Photo 36: WBHO Notice Board: Responsible First Aider and SHE Rep	☑
140	• All project employees (including contractors) will undergo health and safety training on induction and thereafter on a regular basis; Instruct contractors on how to work in line with the health and safety document.	• Health and Safety (H&S) training forms part of the inductions for employees, contractors and visitors. • Employees and contractors undergo ongoing H&S training as per their training schedules. • H&S site rules are displayed on site and emphasised in Toolbox Talks.	• Visitors' Induction (18/06/25) • Site interviews (26/06/25) • Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic	☑
Traffic: *The clearing of the site will result in an increase of heavy vehicle traffic on the internal road network while travelling to areas that need to be cleared. The impact of these heavy vehicles will be very low in terms of traffic as the number of vehicles is not excessive.*				
141	• The mine has prepared a Transport Management Plan which indicates that all traffic must abide by the speed limit (40km/h) and traffic signs are clearly visible.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Air Quality: *Dust generation associated with earth moving activities, land clearing, topsoil removal, material loading and hauling, has its own duration and potential for dust generation. However, dust particles will be suspended and thereafter deposited close to the construction activities. Climatic conditions, such as rainfall and wind, may influence the impact of dust generation in and around the project area.*				
142	• The footprint of the proposed infrastructure area must be clearly demarcated.	• The site perimeter was pegged prior to construction by the Conservation Manager and Environmental Officer.	• Site pegs (Photos 1 and 3) • 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	☑
143	• Vegetation clearing activities will be restricted to the demarcated infrastructure footprint area.	• The 2024 Compliance Audit states that site visits were conducted in May, Jun and Oct 2021 to assess the plant species diversity of the Der Brochen Phase 2 area prior to vegetation clearing, which was restricted to the footprint areas.	• Environmental Officer and Conservation Manager interviews (26/06/25) • 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	☑
144	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
145	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
146	• The mine will implement a revegetation programme on the disturbed areas adjacent to the site clearance area.	• Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth.	• Photo 9 depicts the concurrent rehabilitation on disturbed slopes • Agreenco Progress Reports (Jan and Apr 2025)	☑
147	• Continue with the current air quality monitoring programme.	• Dust buckets are located north and south of the Der Brochen South Shaft construction area. • The closest dust bucket (S3) just northwest of the Mine, recorded dust fallout well below the allowable industrial limit of 1 200 mg/m²/day: namely 135 mg/m²/day average for 2024 and 281 mg/m²/day average for Jan-May 2025.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GCS)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Stockpiling of Topsoil				
Soils, Land Use and Land Capability: *Excavation and removal of topsoil from the proposed infrastructure areas, will lead to an increased risk of transportation of sediment from exposed soils in storm water runoff, leading to loss of natural topography, soil depth, soil volume and alteration of natural drainage pattern.* ***Surface Water:*** *Stripping of topsoil for DMS Stockpiles and portals can result in an increase in erosion from cleared areas. The stockpile could become eroded during storm events and result in localised deterioration of water quality due to increased turbidity and suspended solids in the Groot Dwars River during storm events. Increased turbidity is reversible and surface water should return to pre-impact turbidity levels once sediment levels entering the watercourse are reduced. Settled sediments should naturally move downstream during periods of high flow flowing storm events.* ***Air Quality:*** *Dust generation associated with stockpiling of topsoil will be of concern, however, dust particles will be suspended and thereafter deposited close to the construction activities. Climatic conditions, such as rainfall and wind, may influence the impact of dust generation in and around the project area.*			
148	• Construction personnel and construction vehicles should be kept to the bare minimum per site in order to reduce the construction footprint and potential of soil compaction.	• Only the authorised construction team and required vehicles and equipment for construction of the Mine are present on site.	• Site audit observations (26/06/25)	☑
149	• Soils should be stockpiled on the designated topsoil stockpile area.	• The EMPr does not specify the location of the designated topsoil stockpile area. • Soil has been stockpiled at the disturbed WRD embankment facility footprint, previously authorised for the co-disposal facility, which has been removed from the Mine scope.	• Site interviews (26/06/25) • Photo 37: WRD embankment with soil stockpiles within the footprint	☑
150	• Prevent mixing of high-quality topsoil (A and B-horizons) with low quality underlying material to ensure sufficient volumes of high-quality soil for rehabilitation.	• The Method Statement states that 200 mm of topsoil should be stripped and kept separate from waste rock, trees and vegetation, but not from the underlying subsoil. • Site interviews confirmed that the topsoil and subsoil were mixed on the stockpiles.	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/2021) • Site interviews (26/06/25)	☒
151	• Separate stockpiling of different soil type groups (to obtain the highest post-mining land capability.	• The Method Statement does not state that different soil type groups should be stockpiled separately. • Site interviews confirmed that soil type groups are not stockpiled separately.	• Site interviews (26/06/25)	☒
152	• Separate stripping, stockpiling and replacing of soil horizons (A and B horizon) in the original natural sequence to combat hard setting and compaction, and maintain soil fertility.	• It was confirmed on site that the topsoil and subsoil were mixed on the stockpiles.	• Site interviews (26/06/25)	☒
153	• Stockpiles should be revegetated to establish a vegetation cover as an erosion control measure.	• The stockpiles are continuously being developed and used in concurrent rehabilitation, as the Mine is under construction, and are consequently not being vegetated.	• Any remaining stockpiles, post-construction, will be revegetated.	ⓘ
154	• Temporary berms can be installed, if necessary, around stockpile areas whilst vegetation cover has not established to avoid soil loss through erosion.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
155	• All exposed soils on steep slopes must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent dust generation resulting in vegetation smothering and sedimentation of the watercourses.	• The steep western site slope and boxcut sides were all permanently stabilised, utilising terracing, rock bolts and concrete. • Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth.	• Site audit observations and interviews (26/06/25) • Photo 9 shows the use of the Enviromat® to stabilise the soils on the slope during rehabilitation.	☑
156	• Edge effects of all construction activities, which may affect floral habitat within surrounding areas, are to be strictly managed.	• The site perimeter was pegged prior to construction and site creep is continuously monitored by the Environmental Officer.	• Site audit and interviews (26/06/25)	☑
157	• The mine will implement an alien and invasive plant control plan	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • Various Agreenco reports provide proof of IAP eradication on the Der Brochen footprint.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Service Acceptance Letter (26/05/25) and Progress Reports (12/09/23, 28/06/23 and 26/07/23)	☑
158	• Erosion control measures in the form of temporary erosion prevention berms will be implemented during construction.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
159	• Where possible, activities will be limited to months of low rainfall (dry season) to reduce probability of potential impact.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	☑
160	• The topsoil stockpile will be vegetated and while vegetating, measures will be needed to contain erosion of the stockpile during rain events.	• The stockpiles are continuously being developed and used in concurrent rehabilitation, as the Mine is under construction, and are consequently not being vegetated.	• Any remaining stockpiles, post-construction, will be revegetated.	ⓘ
161	• The mine will implement adequate wet suppression techniques to limit dust release from stockpiling of topsoil.	• The topsoil method statement states that the haul road around the stockpile area will be kept moist to avoid dust. • Evidence of wet suppression during the site audit.	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/21) • Photo 8	☑
162	• The topsoil stockpile footprint area will be demarcated.	• The topsoil method statement refers to the '*setting out of the Topsoil Stockpile area (Survey Method Statement)*'. • The WRD embankment facility footprint has been demarcated for topsoil stockpiling during construction.	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/2021) • Site interviews (26/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
163	• Stockpiling activities will be confined to the demarcated footprint areas.	• Stockpiles are within the designated area.	• Site interviews (26/06/25)	☑
164	• The mine will implement a revegetation programme on the topsoil stockpiles.	• Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth.	• Photo 9 depicts the concurrent rehabilitation on disturbed slopes • Agreenco Progress Reports (Jan and Apr 2025)	☑
165	• Weekly inspections of the stability of the stockpiles will be undertaken.	• Weekly internal (RPM Environmental Officer) and monthly external (SRK Consulting) ECO inspections are undertaken assessing EMPr compliance for Der Brochen.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024)	☑
166	• If erosion and degradation of the topsoil stockpiles is noted during the weekly inspections, measures to stabilise the stockpiles will be investigated (chemical, rock cladding or vegetative), and be implemented.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
Social: *Physical quality of the living environment. Impacts such as noise and dust are expected to occur during topsoil stockpiling and may have an impact on social well-being of communities located near the activities.*				
167	• Implement social incident management procedure including the existing grievances to capture community and stakeholder concerns and grievances regarding environmental impacts	• The Incident Management Procedure addresses social incidents and grievances and steps to manage these. • A grievance register is kept for the Mototolo Complex, including Der Brochen.	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • 2025 Mototolo Complex Grievance Register	☑
168	• Where practicable, stockpiles of soils and materials will be located as far as possible from sensitive receptors, taking account of prevailing wind directions and seasonal variations in the prevailing wind.	• The soil stockpiles were placed in the disturbed WRD embankment facility footprint (previously demarcated for the co-disposal facility, which has been removed from the Mine scope). • The closest residential area is 10 km north-west of DB (EMPr, 2019).	• Site interview (26/06/25) • Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019)	☑
169	• Timing of any large-scale vehicle movements to avoid peak hours on the local road network would also be beneficial;	• A traffic specialist study was conducted as part of the impact assessment phase (EMPr, 2019). • This condition is noted.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019)	ⓘ
170	• Vehicle speeds (especially on unpaved roads) of 40km/h will be enforced to limit the re-entrainment of dust.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
171	• Implement Der Brochen's Emergency Preparedness Plan to communicate with communities regarding ways in which to respond during emergencies.	• The Mototolo Complex External Emergency Management Plan address various emergencies and the affected/vulnerable communities.	• Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001)	☑
Traffic: *The stockpiling of topsoil will result in an increase of heavy vehicle traffic on the internal road network when the trucks travel to and from the stockpiles. The impact of these heavy vehicles will be very low in terms of traffic as the number of vehicles is not excessive.*				
172	• The mine has prepared a Transport Management Plan which indicates that all traffic must abide by the speed limit and traffic signs are clearly visible.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
Visual: *Pre-construction activities will generate visual impacts related to earthworks, vehicles/plant/machinery and workers on site. Construction visual impacts are typically limited to the immediate area surrounding the site and the construction period. Dust generated at the site (e.g. dust from earthworks and trucks travelling on haul roads and dust deposited on off-site vegetation) is visually unappealing and may further detract from the visual quality of the receiving environment.*				
173	• Update the dust suppression/control management programme plan to make provision for reducing dust on new dust-generating infrastructure/facilities, as required (i.e. when a plume is visible on site or when dust is being deposited on vegetation).	• Dust buckets are located north and south of the Der Brochen South Shaft construction area. • The closest dust bucket (S3) just northwest of the Mine, recorded dust fallout well below the allowable industrial limit of 1 200 mg/m²/day: namely 135 mg/m²/day average for 2024 and 281 mg/m²/day average for Jan-May 2025. • Evidence of wet suppression during the site audit.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GCS) • Photo 8	☑
174	• Ensure speed limits on all haul/internal roads are respected at all times.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
175	• Locate new haul roads on disturbed areas as far as possible.	• There were no existing disturbed areas prior to construction commencing. • The temporary haul road for transport of ore is within the future permanent services corridor, and will become the permanent conveyor and powerline maintenance road.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/2024) • Site interviews (26/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Use of existing gravel roads for pre-construction activities				
Surface Water: *In an unmanaged scenario; alteration or damming of water where roads cross ephemeral drainage lines could negatively affect downstream ecosystems, promote significant erosion of water course banks, prevent the flow of surface water to the Groot Dwars River, and cause flooding at and above the point of alteration or obstruction. The impact limited as there is seldom water in the water courses but there is reliance on this resource for aquatic, floral and faunal diversity (refer SAS, 2019). These are existing gravel roads and as such, it is anticipated that this impact is likely to be minimal.*				
176	• The mine will design and construct crossing structures and stormwater outlets in compliance with Regulation 704.	• The Der Brochen FS Water Management Report describes the designs in line with GN704: o stormwater channels, sumps, settling ponds, service water dam, PCD (1:50 yr flood and 0.8 m freeboard).	• Der Brochen FS Water Management Report (14/09/2020) • Photo 15 is the operational mine service water dam • Photo 16 depicts the south PCD under construction • Photo 17 shows the South Mine settling ponds	☑
Air Quality: *Vehicle entrainment from construction vehicles will lead to suspended particulate matter being released into the ambient air.*				
177	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
178	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
Social: *<u>Physical quality of the living environment.</u> Impacts such as noise and dust are expected to occur from trucks and machinery making use of the unsealed/gravel roads. This activity may have an impact on social well-being of communities near the activities.*				
179	• Implement social incident management procedure including the existing grievances to capture community and stakeholder concerns and grievances regarding environmental impacts.	• The Incident Management Procedure addresses social incidents and grievances and steps to manage these. • A grievance register is kept for the Mototolo Complex, including Der Brochen.	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • 2025 Mototolo Complex Grievance Register	☑
180	• Wherever feasible, construction traffic should avoid sensitive roads (residential roads, congested roads, via unsuitable junctions, etc.) and that vehicles are kept clean and sheeted when on public roads.	• Construction vehicles are restricted to the main access and haul roads.	• Site interviews and audit observations (26/06/25)	☑
181	• Timing of any large-scale vehicle movements to avoid peak hours on the local road network would also be beneficial.	• A traffic specialist study was conducted as part of the impact assessment phase (EMPr, 2019). • This condition is noted.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019)	ⓘ
182	• Vehicle speeds (especially on unpaved roads) should be reduced to limit the re-entrainment of dust.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
183	• Implement Der Brochen's Emergency Preparedness Plan to communicate with communities regarding ways in which to respond during emergencies.	• The Mototolo Complex External Emergency Management Plan address various emergencies and the affected/vulnerable communities.	• Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Social: *Health and social well-being. Public health impacts due to dust/air pollution and noise pollution associated construction vehicles on unsealed roads are possible.*				
184	• Environmental pollution (noise, dust, etc.) must be limited as far as possible and the requirements of the EMP be implemented to reduce the impact on surrounding residents. The necessary safety precautions will be taken and first aid supplies will be made available on site; All project employees (including contractors) will undergo health and safety training on induction and thereafter on a regular basis; Instruct contractors on how to work in line with the health and safety document and site rules; and Appoint a Health and Safety representative.	• Noise monitoring is undertaken at the Der Brochen South Shaft construction site boundary. • Equipment is maintained as per the OEM schedule. • Where noise exceeds 85 dBA on site, mandatory hearing protection signs are displayed. • Evidence of wet suppression during the site audit. • H&S training forms part of the inductions for employees, contractors and visitors. • Employees and contractors undergo ongoing H&S training as per their training schedules. • H&S site rules are displayed on site and emphasised in Toolbox Talks. • A Health & Safety Representative was appointed for the Der Brochen Mine.	• Der Brochen Annual Noise Monitoring Report, SLR (07/10/24) • Photo 30: PPE - hearing protection sign • Photo 8: Dust suppression on site • Visitors' Induction (18/06/25) • Site interviews (26/06/25) • Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic • Appointment letter of the Health and Safety Representative for the Earth Works and Bulk Civils at the Der Brochen Project (05/07/23)	
Traffic: *This will result in an increase of heavy vehicle traffic on the internal existing gravel roads. The impact of these heavy vehicles will be very low in terms of traffic as the number of vehicles is not excessive.*				
185	• The mine has prepared a Transport Management Plan which indicates that all traffic must abide by the speed limit (40km/h) and traffic signs are clearly visible.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	
186	• If the gravel roads are in poor condition, the mine will gravel and compact the roads.	• The gravel roads were observed to be in good condition.	• Site audit observations (26/06/25)	
187	• The maintenance of internal roads will be carried out on an ongoing basis.	• The Traffic Management Procedure states: '*All tarred and concreted roads must be inspected on a 3 monthly basis and all other roads must be inspected on a monthly basis by the Responsible Officer in accordance with the task list.*' • The internal roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030) • Site audit observations (26/06/25)	
Visual: *Pre-construction activities will generate visual impacts related to earthworks, vehicles/plant/machinery and workers on site. Construction visual impacts are typically limited to the immediate area surrounding the site and the construction period. Dust generated at the site (e.g. dust from earthworks and trucks travelling on haul roads and dust deposited on off-site vegetation) is visually unappealing and may further detract from the visual quality.*				
188	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• Evidence of wet suppression during the site audit.	• Photo 8	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
189	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
190	• Ensure speed limits on all haul/internal roads are always respected.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
191	• Locate new haul roads on disturbed areas as far as possible.	• There were no existing disturbed areas prior to construction commencing. • The temporary haul road for transport of ore is within the future permanent services corridor, and will become the permanent conveyor and powerline maintenance road.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24) • Site interviews (26/06/25)	☑

Table 3: Der Brochen Amendment Project EIAR & EMPr (Nov, 2019) Compliance Audit Results - Construction Activities

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
TABLE 10-4: CONSTRUCTION ACTIVITIES, ANTICIPATED IMPACTS AND RECOMMENDED MITIGATION MEASURES				
Construction of infrastructure (conveyor belt systems, South Shaft, Ventilation shafts and explosive destruction bay)				
Flora: *The construction off infrastructure and access roads, haul roads and conveyor systems through natural, intact areas may lead to a loss of floral habitat, SCC, plant species diversity and habitat connectivity.*				
192	• Any mining surface infrastructure, including shafts, stockpiles and construction/contractor's camps must be placed within transformed areas as far as possible.	• The temporary construction infrastructure and contractor's laydown areas have been placed within the permanent South Shaft footprint limits. • Stripped topsoil was furthermore placed on the disturbed WRD embankment facility footprint.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24) • Site interviews (26/06/25)	✓
193	• Edge effects of all construction activities, which may affect floral habitat within surrounding areas, are to be strictly managed.	• The site perimeter was pegged prior to construction and site creep is continuously monitored by the Environmental Officer.	• Site audit and interviews (26/06/25)	✓
194	• The mine will implement an alien and invasive plant control plan. Erosion control measures in the form of temporary erosion prevention berms will be implemented during construction.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	✓
195	• Where possible, activities will be limited to months of low rainfall (dry season) to reduce probability of potential impact.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	✓
196	• Ensure that the ephemeral drainage lines, rocky outcrops and areas containing floral SCC are demarcated as no-go zones for personnel and construction vehicles.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• *This commitment should be rephrased in the EMPr to signposted, as demarcation of sensitive habitats through fencing, would cause additional disturbance*	✓
197	• As far as possible vehicles are to utilise the existing roads. Where this is not feasible, new roads are to be in areas of existing high disturbance, and not encroach upon sensitive habitats.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Environmental Officer and Conservation Manager interviews (26/06/25) • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	✓
198	• Access roads will be planned and constructed in such a way as to avoid habitat fragmentation.	• The services corridor (road, conveyor and powerline) will cause habitat fragmentation, as there are no crossing points for fauna.	• Site audit observations and interviews (26/06/25)	✗

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
199	• A rehabilitation plan will be implemented upon completion of the construction activities to ensure that the affected areas return to an ecologically functioning state, thereby increasing habitat connectivity within affected areas.	• Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth. • Rehabilitated areas are monitored and this will be done for all construction areas post rehabilitation.	• Photo 9 depicts the concurrent rehabilitation on disturbed slopes • Photo 10 shows the successful rehabilitation of the side slopes, with the basal vegetation cover re-established after two rain seasons • Agreenco Progress Reports (Jan and Apr 2025)	
Flora: *Increased fire frequency and intensity, as well as uncontrolled fires due to increased human activity may impact on floral communities.*				
200	• Prevent all open fires.	• Designated smoking areas were observed on site. • The WBHO Information Board had an RPM Fire Safety Topic for Jun 2025 displayed.	• Photo 5 • Photo 6	
201	• Provide fire safe zone facilities and suitable fire control measures.	• Designated smoking areas were observed on site. • The WBHO Information Board had an RPM Fire Safety Topic for Jun 2025 displayed.	• Photo 5 • Photo 6	
202	• Use of trees, shrubs or any vegetation for fire making purposes is strictly prohibited.	• The site Environmental Inductions specify that the collection of firewood and plant species are prohibited.	• Site Interviews (26/06/25)	
203	• A Fire Management Plan (FMP) will be set in place to ensure that any fires that do originate can be managed and / or stopped before the significant damage to the environment occurs.	• The ERT is responsible for fire brakes across the Mototolo Complex. The focus is on infrastructure safeguarding as well as grazing management. Annual burnt areas across the property are tracked. • Firebreaks will be burnt around the infrastructure (Conservation Manager interview on 26/06/25).	• Guidance Note on Controlled Burn and Fire Breaks (2025) • Fire Burning Permit (13/06/25)	
Flora: *Loss of surrounding floral biodiversity and floral SCC through invasion of alien species in disturbed area. Specific mention in this regard is made to Category 1b species identified within the development footprint areas;*				
204	• The mine will Implement an alien and invasive plant control plan.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • Various Agreenco reports provide proof of IAP eradication on the Der Brochen footprint.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Service Acceptance Letter (26/05/25) and Progress Reports (12/09/23, 28/06/23 and 26/07/2023)	
Flora: *Soil compaction and erosion as a result of development activities and storm water runoff leading to a loss of floral diversity*				
205	• All soils compacted as a result of construction activities falling outside of the proposed infrastructure areas will be ripped and profiled.	• Areas handed over by the construction team have been/are being rehabilitated. • The Agreenco rehabilitation progress reports refer to preparation and scarification of areas prior to seeding.	• Conservation Manager interviews and follow-up emails • Agreenco Progress Reports (Jan and Apr 2025)	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
206	• The mine will Implement an alien and invasive plant control plan.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • Various Agreenco reports provide proof of IAP eradication on the Der Brochen footprint.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Service Acceptance Letter (26/05/25) and Progress Reports (12/09/23, 28/06/23 and 26/07/23)	☑
Freshwater Aquatics: *Surface impacts (blasting, drilling and shaft preparation) have the potential to lead to the contamination of freshwater resources due to chemicals/ hydrocarbons contamination and/or increased sedimentation. This will have a negative impact on riparian and in-stream habitat and/or biota.*				
207	• Sheet runoff from access roads should be slowed down by the strategic placement of berms.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
208	• A soil management plan, including erosion / run-off control for construction phase to be developed and implemented.	• The Method Statement describes the stripping and stockpiling of topsoil, including management of the stockpiles. • The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding and manage erosion of silt into the nearby natural water channels.	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/21) • WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
209	• As far as possible, all construction activities should occur in the low flow season, during the drier winter months.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	☑
210	• Monitor all areas outside of the development footprint for erosion and incision.	• Weekly internal (RPM Environmental Officer) and monthly external (SRK Consulting) ECO inspections are undertaken assessing EMPr compliance for Der Brochen. • The site perimeter was pegged prior to construction and site creep is continuously monitored by the Environmental Officer.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • Site audit and interviews (26/06/25)	☑
211	• Fresh concrete and cement mortar should not be mixed near the watercourses. Mixing of cement may be done within the construction camp, may not be mixed on bare soil, and must be within a lined, bound or bunded portable mixer. Consideration must be taken to use ready mix concrete.	• No designated lined or bunded concrete and cement mixing areas were observed on site. • There were however also no concrete or cement spills/residues on bare ground on site.	• Site audit observations (26/06/25)	ⓘ

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
212	• No mixed concrete shall be deposited directly onto the ground within the watercourses or its associated riparian habitat. A batter board or other suitable platform/mixing tray is to be provided onto which any mixed concrete can be deposited whilst it awaits placing.	• No platforms nor mixing trays were observed. • There were however also no concrete or cement spills/residues on bare ground on site.	• Site audit observations (26/06/25)	
213	• Cement bags must be disposed of in the demarcated hazardous waste receptacles and the used bags must be disposed of through the hazardous substance waste stream.	• The Waste Management Procedures does not specifically refer to disposal of cement bags. • No evidence was provided for the disposal of cement bags and no cement bags were observed on site during the 2025 audit, though the 2024 external audit stated that bags are disposed of in hazardous bins.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Site audit observations (26/06/25).	
214	• Spilled or excess concrete must be disposed of at a suitable landfill site.	• No concrete or cement spills/residues were observed on bare ground on site.	• Site audit observations (26/06/25).	
Freshwater Aquatics: *Alteration of the hydrological characteristics of the local catchment due to the creation of stockpiles, especially within drainage lines, may lead to: - Loss of recharge to downstream systems; - Potential erosion of terrestrial areas as preferential flow paths are formed in the landscape; - Potential for erosion and sedimentation of freshwater resources, leading to altered channel competency and altered vegetation community composition; and - Altered runoff peaks leading to changes in the hydrological regime of the freshwater resources.*				
215	• Construct and maintain clean and dirty water management infrastructure. A soil management plan, including erosion / run-off control for construction phase to be developed and implemented.	• The WBHO Temporary SWMP states that the Haul Road Terrace culvert, South Shaft storm water cut off trench attenuation pond and the Haul Road culvert crossings 1-9 were implemented to divert clean water around the infrastructure and tie into the permanent site SWMP. • The SWMP also addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding and manage erosion of silt into the nearby natural water channels. • The Method Statement describes the stripping and stockpiling of topsoil, including management of the stockpiles.	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/21) • WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
216	• Implement the biodiversity, surface and groundwater monitoring programmes.	• Scientific Aquatic Services (SAS) undertakes Summer and Winter Aquatic Biomonitoring annually at Der Brochen - the latest surveys being and Jul and Dec 2024. • GCS Water and Environmental (Pty) Ltd (GCS) conducts the quarterly surface water flow and quality, drinking water quality, as well as groundwater levels and quality monitoring at Der Brochen - quarterly reports are submitted to DWS.	• Aquatic Biomonitoring of the Groot Dwars River and Klein Dwars River in the vicinity of the Der Brochen, Mototolo and Richmond Project Areas (SAS, Mar 2025) • Aquatic Biomonitoring of the Groot Dwars River and Klein Dwars River in the vicinity of the Der Brochen, Mototolo and Richmond Project Areas (SAS, Oct 2024) • Proof of quarterly submission of the Der Brochen Water Monitoring Reports for Q4 2024 (28/02/25)	
217	• If the monitoring programme identifies significant changes in water quality, the mine must investigate the source and implement appropriate actions.	• The Water Quality Monitoring Reports for the Der Brochen Mine all include a summary of the results, comparison to previous results and recommendations where significant changes are observed. • The 2024 annual and 2025 First Quarter Reports reported EC, TDS, calcium and magnesium concentrations were observed exceeding the South African Water Quality Guideline (SAWQG) target values intermittently in the unfiltered water on site, but all filtered samples [Reverse Osmosis (RO) filters] indicated acceptable water quality throughout 2024 and the first quarter of 2025. The surface water quality in the Groot Dwars River showed no significant impact from the site during 2024 and 2025 to date.	• Annual Water Quality Monitoring Report for the Der Brochen Project: Jan-Dec 2024 (GCS, 11/02/25) • Quarterly Water Quality Monitoring Report for the Der Brochen Project: First Quarter, Mar 2025 (GCS, 25/04/25)	
218	• All wet and dry material should be stored within the construction camp, and these materials should be covered and contained to prevent contact with rainfall or runoff.	• The Der Brochen South Shaft ROM developmental ore is being hauled from underground to the transfer point using underground vehicles, temporarily stockpiled and transferred to surface haul trucks, for transport to the Mototolo Concentrator. • The transfer point is located within the disturbed Der Brochen Mine footprint (not the construction camp), but is not covered nor contained and thus in contact with rainfall and runoff.	• Photo 39: ore transfer point • *This commitment should be updated in the EMPr to include the temporary stockpiling of ore during shaft development, during which the ore cannot be covered as it is only temporarily stockpiled prior to being transferred from the underground vehicles to the surface haul trucks.* • The transfer point should however be upgraded so the ore is stored on an impermeable surface and contained from runoff.	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Freshwater Aquatics: *Construction activities relating to supporting structures (conveyor supports, powerline pylons, bridge crossings), and the mixing and casting of concrete has the potential to impact on the freshwater aquatics.*				
219	• Contractor laydown areas, material storage facilities and mixing of concrete to remain outside of the stipulated NEMA zone of regulation (32m) applicable to each freshwater resource.	• The main construction site and facilities are not within the 32 m zone of the Groot Dwars River nor its tributaries, but the services corridor does cross over several drainage lines and is thus within the 32 m zone of these streams. • The Der Brochen Mine has an approved 2021 Water Use Licence (WUL) as well as GN704 exemption authorisation, for the infrastructure and activities within 100 m of the Groot Dwars River.	• Der Brochen Water Use Licence No: 06/B41G/ABCGIJ/10965 (30/11/21)	☑
220	• This zone of regulation must be demarcated clearly by the Environmental Officer prior to the commencement of construction activities.	• The construction drawings only include the 1:100 year floodline, but not the 32 m zone of regulation.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24) • *This commitment should be updated in the EMPr to specify demarcation on the construction drawings and signposted on site, as demarcation of sensitive habitats through fencing, would cause additional disturbance in a Critical Biodiversity Area, endangered ecosystem, the Sekhukhuneland Centre of Endemism and potential floral endemics and TOPS.*	☒
Soils, Land Use and Land Capability: *Movement of heavy machinery / construction vehicles off existing/demarcated roads, leading to soil compaction and potential spillage from machinery / construction vehicles*				
221	• All vehicular traffic should be restricted to the existing service roads and the selected haul road servitude as far as practically possible.	• All vehicles are restricted to the main access and haul roads.	• Site interviews and audit observations (26/06/25)	☑
222	• Compacted soils adjacent to the mining related infrastructure footprint can be lightly ripped to at least 25 cm below ground surface to alleviate compaction prior to re-vegetation.	• Areas handed over by the construction team have been/are being rehabilitated. • The Agreenco rehabilitation progress reports refer to preparation and scarification of areas prior to seeding.	• Conservation Manager interviews and follow-up emails • Agreenco Progress Reports (Jan and Apr 2025)	☑
Soils, Land Use and Land Capability: *Construction of surface infrastructure increasing the potential risk of soil erosion, dust emission, sedimentation and disposal of waste on soil resources, leading to altered soil chemistry and quality and/or altered flow patterns due to instream blockages.*				
223	• Sheet runoff from access roads should be slowed down by the strategic placement of berms.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
224	• A soil management plan, including erosion / run-off control for construction phase to be developed and implemented.	• The Method Statement describes the stripping and stockpiling of topsoil, including management of the stockpiles. • The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding and manage erosion of silt into the nearby natural water channels.	• Method Statement: Topsoil Stockpile Management (WBHO, 14/01/21) • WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
225	• As far as possible, all construction activities should occur in the low flow season, during the drier winter month.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	☑
226	• Monitor all areas outside of the development footprint for erosion.	• Weekly internal (RPM Environmental Officer) and monthly external (SRK Consulting) ECO inspections are undertaken assessing EMPr compliance for Der Brochen. • The site perimeter was pegged prior to construction and site creep is continuously monitored by the Environmental Officer.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • Site audit and interviews (26/06/25)	☑
227	• Exposed slopes especially along the riparian areas are highly prone to erosion, so drainage control features such as earth berms, perimeter berm/swales, or diversions.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
228	• Any gullies occurring as a result of erosion from the construction activities must be actively repaired by means of brush layering or live gully repair: o Brush layering is effective for earth reinforcement and mass stability. Brush layers break up the slope length, preventing surface erosion, and reinforce the soil with branch stems and roots, providing resistance to sliding or shear displacement. Brush layers also trap debris, aid infiltration on dry slopes, dry excessively wet sites, and mitigate slope seepage by acting as horizontal drains. Brush layers facilitate vegetation establishment by providing a stable slope and a favourable microclimate for growth of vegetation. o Live gully repair is a technique that is similar to branch packing but is used to repair rills and gullies. Live gully repairs offer immediate reinforcement and reduce the velocity of concentrated flows. They also provide a filter barrier that reduces further rill and gully erosion and must be used where gully erosion is taking place on the project footprint.	• The WBHO Temporary SWMP refers to the repair of gullies larger than 300 mm, stating repair with a grader, excavator or Tractor-Loader-Backhoe (TLB). • Though some erosion was observed on site, no excessively deep gullies were seen.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
229	• Stream banks must be reprofiled to the pre-construction upstream and downstream slopes.	• The installation of the 9 culverts at the stream crossings along the services corridor, include reprofiling of the slopes as part of the rehabilitation process.	• Site audit and interviews (26/06/25)	☑
Surface Water: *Reduction in water quality due to an increase in turbidity as a result of an increase in erosion due to cleared, compacted or hard standing areas. Increased turbidity is reversible and surface water should return to pre-impact turbidity levels once sediment levels entering the watercourse are reduced. Settled sediments should naturally move downstream during periods of high flow flowing storm events.*				
230	• Flood protection berms should be constructed at the area where the South Shaft and DMS Stockpile.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
231	• Erosion control measures in the form of temporary erosion prevention berms should be implemented during construction.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
232	• Clean water diversion bunds should be constructed upstream of the construction site prior to clearing areas for new infrastructure.	• The WBHO Temporary SWMP states that the Haul Road Terrace culvert, South Shaft storm water cut off trench attenuation pond and the Haul Road culvert crossings 1-9 were implemented to divert clean water around the infrastructure and tie into the permanent site SWMP.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
233	• PCDs should be constructed downstream of the working activities to minimize uncontrolled runoff from the site.	• The PCD for the South Shaft is currently under construction downstream of the working activities. • The North PCD has been constructed and was observed to be in use at the time of the inspection.	• Photo 16	☑
234	• Areas disturbed by construction activities should be rehabilitated immediately on completion of construction of each area.	• Areas handed over by the construction team have been/are being rehabilitated as soon as accessible.	• Agreenco Progress Reports (Jan and Apr 2025) • Photos 9 and 10	☑
235	• Activities should be limited to months of low rainfall (dry season) to reduce probability of potential impact.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	☑
Surface Water: *Provision of hard standing areas and compacted areas will reduce infiltration and increase the volume and velocity of stormwater runoff with subsequent potential for damming of water and flooding. Increased runoff velocity.*				
236	• Stormwater measures should be appropriately designed to allow for free flow of water.	• The WBHO Temporary SWMP and Project FS Water Report both do not refer to designs allowing for free flow of water. • No permanent SWMP has been developed for the Der Brochen Mine. • The latest 2024 Rehabilitation Strategy and Implementation Plan (RSIP) states that the Closure Objectives include: "*Runoff contained only in designed and approved structures, otherwise free draining system back to natural system*."	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Der Brochen FS Water Management Report (14/09/20) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	☒
237	• Areas should be appropriately graded to prevent ponding.	• The WBHO Temporary SWMP addresses ponding of water, to be addressed through the placement of berms and levelling off of material.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface Water: *Deterioration in surface water quality due to spillages and accidental discharges. Spillages and accidental discharges could result in the contamination of surface water resources. Localised accidental spillages of hydrocarbons (diesel, oils etc.) from earthmoving and construction equipment, hazardous substances (ammonia nitrates for blasting) and other potentially polluting materials including human waste, could result in contaminated runoff leaving the site if spillages are not contained or inadequate emergency control measures are in place. This could result in indirect contamination of the surface water resources.*				
238	• Clean water diversions should be constructed prior to clearing areas for new infrastructure.	• The clean water diversion around the upper level of the South Shaft terrace was constructed in parallel with the site clearing activities down gradient.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024)	
239	• Hazardous substances and potentially polluting materials should be stored in appropriately bunded areas located outside of the riparian zone. Bunds should be designed for a capacity of 110% of the stored material.	• The Hydrocarbon Management Procedure describes bund and settlement requirements. • Some compliant areas were observed: o WBHO oils storage in an impermeable container o self-bunded diesel storage tank on a hardstand. • Various non-compliances were observed: o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o equipment parked with either no drip trays or inadequately sized drip trays o hazardous waste skips stored on bare ground.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Compliant: o Photos 19 and 21 • Non-compliant: o Photos 22, 24 and 40	
240	• Servicing and maintenance of vehicles and equipment should be done outside the riparian zone in appropriate facilities designed for this purpose. Contractors should be adequately trained in handling of hazardous substances and potentially polluting materials especially during transport in the vicinity of the riparian zone, e.g. over river crossings.	• Servicing and maintenance of vehicles and equipment is done at the temporary workshop, which is located outside the riparian zone. • Hazardous substances are delivered to site by external parties with the correct permits and training to transport these. • Hazardous waste is transported separately off-site by an external contractor trained in handling these materials.	• Photo 18: Temporary workshop • Photo 41: Hazardous waste manifest	

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
241	• Contractors should be made aware of the WUL conditions that apply during construction and made liable for environmental damages caused by spillages. Emergency action plans should be drawn up to deal with spillages.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings. • The Incident Management Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Incident Management Procedures also refers to Incident action plans. • The Hydrocarbon Management Procedures states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.'	• Weekly Safety Meeting Attendance Register (07/05/25) • Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	☑
242	• Contaminated runoff should be contained and reused as necessary e.g. for dust suppression.	• Dirty runoff is currently directed to the Mine settling ponds and then the service water dam, from where it is reused underground.	• Site audit interviews (26/06/25) • Photo 15 is the operational mine service water dam • Photo 17 shows the South Mine settling ponds	☑
243	• Chemical toilets should be provided at construction sites.	• Male and female ablution facilities are provided throughout the site (26/6/25).	• Photo 29	☑
Surface Water: *Alteration of catchment hydrology causing change in watercourse functionality and increased risk of flooding and scouring.* *Surface drainage paths exist within the footprint area of the proposed infrastructure which capture water during rainfall events, but most of the time are dry. The hydrology of these water courses will have to change to allow the development of the portals and stockpiles, and clean water diversions will be required to route catchment water around these areas. This alteration of catchment hydrology can cause a change in watercourse functionality which, without adequate clean water diversions or suitable grading of areas, could result in an increased risk of flooding upstream (impedance of flow) which could result in damage to property and infrastructure. The impact will be localised but will remain throughout the activity.*				
244	• Appropriately designed and constructed crossing structures and stormwater outlets in compliance with Regulation 704 will reduce the potential for erosion.	• The Der Brochen FS Water Management Report describes the designs in line with GN704: o stormwater channels, sumps, settling ponds, service water dam, PCD (1:50 yr flood and 0.8 m freeboard).	• Der Brochen FS Water Management Report (14/09/20) • Photo 15 is the operational mine service water dam • Photo 16 depicts the PCD under construction • Photo 17 shows the South Mine settling ponds	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
245	• The mine will undertake ongoing monitoring and maintenance.	• The Temporary SWMP states that: o the silt traps will be monitored on a weekly basis and after rain events o siltation of the silt trap will be maintained by periodically cleaning it out o sediment that is collected in the trap will be used on the construction or maintaining the berms on site. o siltation, undercutting of the excavated trenches and stability of road crossings over pipes will be monitored and maintained.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Evidence viewed of maintenance of stormwater management infrastructure on site during the audit (26/06/25)	☑
246	• Stormwater measures should be appropriately designed to allow for free flow of water.	• The WBHO Temporary SWMP and Project FS Water Report both do not refer to designs allowing for free flow of water. • No permanent SWMP has been developed for the Der Brochen Mine. • The latest 2024 RSIP states that the Closure Objectives include: "*Runoff contained only in designed and approved structures, otherwise free draining system back to natural system.*"	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Der Brochen FS Water Management Report (14/09/20) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	☒
247	• The mine will implement the conditions of the storm water management plan.	• The conditions of the WBHO temporary SWMP have been implemented during construction.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • *An operational SWMP is required for the permanent structures and ongoing operation of the Mine.*	☑
Surface Water: *Provision of hard standing areas will reduce infiltration and increase the volume and velocity of stormwater runoff with subsequent potential for damming of water and flooding as discussed above.*				
248	• Stormwater measures should be appropriately designed to allow for free flow of water.	• The WBHO Temporary SWMP and Project FS Water Report both do not refer to designs allowing for free flow of water. • No permanent SWMP has been developed for the Der Brochen Mine. • The latest 2024 RSIP states that the Closure Objectives include: "*Runoff contained only in designed and approved structures, otherwise free draining system back to natural system.*"	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Der Brochen FS Water Management Report (14/09/20) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	☒
249	• The mine will implement the conditions of the storm water management plan.	• The conditions of the WBHO temporary SWMP have been implemented during construction.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • *An operational SWMP is required for the permanent structures and ongoing operation of the Mine.*	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
250	• Areas should be appropriately graded to prevent ponding.	• The WBHO Temporary SWMP addresses ponding of water, to be addressed through the placement of berms and levelling off of material.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
Noise: *<u>Blasting of the decline shaft portal.</u> Blasting during the construction phase will be the biggest increase in the prevailing ambient noise level on an intermittent basis. The blasting activities during the construction phase must be done in conjunction with the safe blasting techniques and monitoring of each blast must take place. The use of mechanised machinery will create a noise increase in the immediate vicinity of the construction activity.*				
251	• Blasting to be done during daytime and to use the safe blasting techniques.	• The Explosive Procedure states: 6 Day Work Week over two shifts blasting at the end of each shift once the Mine is operational. • The Mine Engineer advised that construction hours are: o 07:00 - 17:00 weekdays o 07:00 - 12:00 Saturdays. • The Explosive Procedure includes all legislative requirements related to explosives receipt, storage, issuing, transportation, approved explosives and usage, as well as primary and secondary blasting to be performed by a competent person, certification of initiation apparatus and blasting systems, precautionary measures before initiating explosive charges, precautions after charges have been initiated, precautions when initiating by means of electricity, prevention of flammable gas and coal dust explosions, shot holes to be stemmed and tamped, amount or mass of explosives in a shot hole, general precautions and detailed safety requirements.	• Der Brochen Operation Procedure: Weathered Zone - Explosive Procedure (DRB-MIN-EXO-PRO-0001) • Site interviews (26/06/25)	☑
252	• Ground vibration monitoring must be done at the nearest residential areas during each blast.	• There is no impact on residential areas as the nearest area is about 2 km from the mining activities.	• Post-audit clarifications	N/A
253	• Environmental noise monitoring must be undertaken on a quarterly basis.	• Noise monitoring was undertaken at the Der Brochen South Shaft construction site boundary in Sep 2024. • No evidence of quarterly noise monitoring supplied.	• Der Brochen Annual Noise Monitoring Report, SLR (07/10/24)	☒
Air Quality: *This phase will comprise a series of different operations including material loading and hauling, compacting, grading(etc.). These activities will have the potential to release dust. However, dust particles will be suspended and thereafter deposited close to the construction activities. Climatic conditions, such as rainfall and wind, may influence the impact of dust generation in and around the project area.*				
254	• Wet suppression will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• Evidence of wet suppression during the site audit.	• Photo 8	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
255	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
256	• The mine will implement a revegetation programme on the disturbed areas adjacent to the site clearance area.	• Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth.	• Photo 9 depicts the concurrent rehabilitation on disturbed slopes • Agreenco Progress Reports (Jan and Apr 2025)	☑
Heritage: *All impacts relating to heritage assessments were assessed under the planning stage of the pre-construction activities, as the heritage management plans needs to be undertaken prior to site clearing activities commencing. However, there is a possibility that additional heritage sites can be identified during pre-construction activities. As such, a chance find procedure must be undertaken.*				
257	• The following 'Chance find Procedure' will be followed if further historical features are identified within the project footprint: o Upon finding any archaeological or historical material all work at the affected area must cease. o The area should be demarcated in order to prevent any further work there until an investigation has been completed. o An archaeologist should be contacted immediately to advice the applicant and contractor of the required processes to be followed. o If needed, the necessary permit will be applied for with SAHRA. This will be done in conjunction with the appointed archaeologist. o The removal of such archaeological material will be done by the archaeologist in lieu of the approval given by SAHRA, including any conditions stipulated by the latter.	• The Cultural Heritage and Chance Find Procedure defines the appropriate cultural heritage CF response guidelines consistent with RPM Standards and in accordance with international standards of good practice. • The Cultural Heritage Chance Find Procedure describes the framework steps to be followed for any CFs, as follows: o Stop all works in the vicinity of the find. Notify the person in charge. o Delineate and secure the area, take photos and record details. o Preliminary evaluation by qualified specialists. o If finds are significant, notify the relevant authorities. o Await investigation by relevant authorities. o Construction/Operations resume following implementation of investigation's findings and written permission from authorities.	• Mototolo Complex Cultural Heritage Chance Find Procedure (MOTC-ALL-SER-PRO-0004)	☑
258	• Work on site will only continue after removal of the archaeological/historical material was done.	• Where graves and archaeologically sensitive sites were identified, construction activities only commenced once mitigation actions were completed.	• PGS Reports (21/10/22 and 15/10/24) • Specialist report on the Stone Age occurrences at Der Brochen Site DBAP 7 (16/11/20)	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
Social: *Influx of job seekers into the study area. There is a likelihood that job seekers will move into the study area and seek accommodation in the villages located near the mine (specifically the Pakaneng Village and Kalkfontein). This may cause conflict with existing community members who currently feel that they have not been fairly considered for job opportunities at the mine.*				
259	• Anglo should consider the establishment of a Community Monitoring Forum (CMF) in order to monitor the construction phase and the implementation of the recommended mitigation measures.	• The SP Team attends various community forums, such as the existing Community Engagement Forum. • RPM established the Mine Future Forum in 2022 which is tasked to ensure optimum performance of the operational units. • The SLP Implementation Plan track the implementation of all targets and projects.	• Site interviews • 2025 SLP Implementation Plan - Mototolo Complex	☑
260	• The CMF should include the following: Enforcing local employment far as practically possible.	• The RPM Mototolo Mine Contractor Recruitment Process outlines their approach to social management and monitoring of contractors as part of the social responsibility they conduct in their operations and to their stakeholders and addresses: o the AOI o only if the contractor can demonstrate that they are unable to source the required skills locally will they be allowed to employ a person from outside the AOI o SP will not sign off on the pre-approval onboarding form if this process has not been followed.	• RPM Mototolo Mine Contractor Recruitment Process	☑
261	• Avoid the establishment of camps, hostels or temporary accommodation for workers.	• There are sufficient existing accommodation establishments in the surrounding area and closest towns to the Mine. • With local recruitment being prioritised, those employees/contractors already reside in the area.	• RPM Mototolo Mine Contractor Recruitment Process	☑
262	• Assist employees (non-local) with suitable employment in the surrounding the area.	• The SLP refers to one of the Zimele programme's key programmes being: "*Youth Development through increased youth workforce readiness: Build capacity of local youth, such that they are able to start a new business, increase sales of an existing business or gain formal employment. This will support jobs via direct placement in industries that go beyond mining*". • The SLP Implementation Plan tracks the learnerships for local communities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025 (25/10/24) • 2025 SLP Implementation Plan - Mototolo Complex	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
263	• Provide employees with adequate health support from the project team for work-related health problems, including the dissemination of the Health and Safety Policy -including HIV/AIDS policy, and any awareness training required as part of the general employment contract with contract or permanent staff.	• H&S training forms part of the inductions for employees, contractors and visitors. • Employees and contractors undergo ongoing H&S training as per their training schedules. • H&S site rules are displayed on site and emphasised in Toolbox Talks. • A Health & Safety Representative was appointed for the Der Brochen Mine. • Proof of Platinum Health HIV/AIDS pamphlets and talk topics were provided to the auditor, which include contact numbers of councillors and Mental Health Services.	• Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic • Appointment letter of the Health and Safety Representative for the Earth Works and Bulk Civils at the Der Brochen Project (05/07/23) • Platinum Health pamphlet: Adjusting to Life with HIV • Platinum Health pamphlet: How to navigate your relationship	☑
Social: *<u>Creation of employment and income.</u> During the construction phase, contractors will be employed to undertake the required construction activities in line with the development plan. This creation of employment will be short term, for the duration of the pre-construction and construction phases.*				
264	• Emerging employment opportunities should be targeted at local residents as well as people from the surrounding communities in cases where the skills cannot be obtained from immediately adjacent communities.	• The RPM Mototolo Mine Contractor Recruitment Process outlines their approach to social management and monitoring of contractors as part of the social responsibility they conduct in their operations and to their stakeholders and addresses: o the AOI o only if the contractor can demonstrate that they are unable to source the required skills locally will they be allowed to employ a person from outside the AOI o SP will not sign off on the pre-approval onboarding form if this process has not been followed.	• RPM Mototolo Mine Contractor Recruitment Process	☑
265	• Recruitment of labour should be guided by Anglo's recruitment policies which should promote the employment of local labour by any appointed contractors.	• Recruitment is done in line with the RPM Recruitment Process.	• RPM Mototolo Mine Contractor Recruitment Process	☑
266	• Anglo should ensure that a transparent process of employment is followed to limit opportunities for conflict situations. The support of local business and the use of their products and services should be promoted as far as possible.	• The RPM Mototolo Mine Contractor Recruitment Process includes: o job adverts (reviewed and placed by SP for 14 days) o review of CVs, with instruction that priority must be given to candidates from communities in the AOI o in-person and online sign-off for each candidate.	• RPM Mototolo Mine Contractor Recruitment Process	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Social: *Physical quality of the living environment. Impacts such as noise and dust are expected to occur from construction trucks and machinery. This activity may have an impact on social well-being of communities in close proximity to the activities.*				
267	• As with noise impacts, a comments and complaints register, accessible to members of public, should be implemented and maintained.	• The Incident Management Procedure addresses social incidents and grievances and steps to manage these. • A grievance register is kept for the Mototolo Complex, including Der Brochen.	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • 2025 Mototolo Complex Grievance Register	☑
268	• Wherever feasible, construction traffic should avoid sensitive roads (residential roads, congested roads, via unsuitable junctions, etc.) and that vehicles are kept clean and sheeted when on public roads.	• Construction vehicles are restricted to the main access and haul roads.	• Site interviews and audit observations (26/06/25)	☑
269	• Timing of any large-scale vehicle movements to avoid peak hours on the local road network would also be beneficial.	• A traffic specialist study was conducted as part of the impact assessment phase (EMPr, 2019). • This condition is noted.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019)	ⓘ
270	• Vehicle speeds (especially on unpaved roads) should be reduced so as to limit the re-entrainment of dust.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
Social: *Health and social well-being. Public and workforce health impacts due to dust/air pollution and noise pollution associated construction vehicles and machinery on site.*				
271	• Environmental pollution (noise, dust, etc.) must be limited as far as possible and the requirements of the EMP be implemented to reduce the impact on surrounding residents.	• Noise monitoring is undertaken at the Der Brochen south shaft construction site boundary. • Equipment is maintained as per the OEM schedule. • Where noise exceeds 85 dBA on site, mandatory hearing protection signs are displayed. • Evidence of wet suppression during the site audit.	• Der Brochen Annual Noise Monitoring Report, SLR (07/10/24) • Photo 30 - PPE - hearing protection sign • Photo 8 - dust suppression on site	☑
272	• The necessary safety precautions should be taken, and first aid supplies should be made available on site.	• The Mototolo Complex has various Safety and Health Procedures addressing safety precautions and first aid, such as the External Emergency Management Plan. • Safety signage, emergency contact numbers, responsible first aiders on site with contact details, were all observed on site during the audit.	• Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001) • Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic • Photo 35: WBHO Laydown designated walkway, Fire Safety Rules Sign and Fire Extinguisher • Photo 36: WBHO Notice Board: Responsible First Aider and SHE Rep	☑
273	• All project employees (including contractors) should undergo health and safety training on induction and thereafter on a regular basis.	• H&S training forms part of the inductions for employees, contractors and visitors. • Employees and contractors undergo ongoing H&S training as per their training schedules.	• Visitors' Induction (18/06/25) • Site interviews (26/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
274	• Instruct contractors on how to work in line with the health and safety document and site rules.	• H&S site rules are displayed on site and emphasised in Toolbox Talks.	• Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic	✓
275	• The mine will appoint a Health and Safety representative.	• A Health & Safety Representative was appointed for the Der Brochen Mine.	• Appointment letter of the Health and Safety Representative for the Earth Works and Bulk Civils at the Der Brochen Project (05/07/23)	✓
Traffic: *This will result in an increase of heavy and light vehicle traffic on the internal roads. The impact of these vehicles will be very low in terms of traffic as the number of vehicles is not excessive.*				
276	• The mine will maintain the internal roads. Gravel roads will be regraded and compacted.	• The gravel roads were observed to be in good condition. • The Traffic Management Procedure states: '*All tarred and concreted roads must be inspected on a 3 monthly basis and all other roads must be inspected on a monthly basis by the Responsible Officer in accordance with the task list.*' • The internal roads are still under construction, but will be monitored and maintained once completed.	• Site audit observations (26/06/25) • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	✓
277	• Asphalt roads will undergo pothole repair and resurfacing where necessary.	• The Traffic Management Procedure states: '*All tarred and concreted roads must be inspected on a 3 monthly basis and all other roads must be inspected on a monthly basis by the Responsible Officer in accordance with the task list.*' • The asphalt roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	ⓘ
278	• The maintenance of internal roads will be carried out on an ongoing basis.	• The internal roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	ⓘ
Visual: *Altered sense of place and visual intrusion caused by infrastructure.*				
279	• Moisture control will be necessary on large bare areas during dry season construction, in order to reduce the frequency and amount of dust suspended in the ambient air.	• Evidence of wet suppression during the site audit.	• Photo 8	✓
280	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	✓
Construction of gravel maintenance roads to the proposed ventilation shafts				
Soils, Land Use and Land Capability: *Movement of heavy machinery / construction vehicles off existing/demarcated roads, loading to soil compaction and potential spillage from machinery / construction vehicles.*				
281	• All vehicular traffic should be restricted to the existing service roads and the selected haul road servitude as far as practically possible.	• All vehicles are restricted to the main access and haul roads.	• Site interviews and audit observations (26/06/25)	✓

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
282	• Compacted soils adjacent to the mining blocks and associated infrastructure footprint can be lightly ripped to at least 25 cm below ground surface to alleviate compaction prior to re-vegetation.	• Areas handed over by the construction team have been/are being rehabilitated. • The Agreenco rehabilitation progress reports refer to preparation and scarification of areas prior to seeding.	• Conservation Manager interviews and follow-up emails • Agreenco Progress Reports (Jan and Apr 2025)	
Surface Water: *Deterioration of surface water quality due to erosion, spillages and accidental discharges at conveyor or road crossings.*				
283	• Construction should take place in the low flow period (dry season) as far as possible.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine*	
284	• Areas disturbed by linear construction activities should be rehabilitated immediately on completion of construction of each area.	• Areas handed over by the construction team have been/are being rehabilitated as soon as accessible. • The slopes and area adjacent to the services corridor will be rehabilitated as soon as construction is completed.	• Agreenco Progress Reports (Jan and Apr 2025) • Photos 9 and 10	
285	• Erosion protection and energy dissipaters should be constructed at the crossings as applicable.	• The FS Water Management Report states that the inlet structure and outlet structures to these culverts are designed in such a way to reduce the potential of water erosion along the water course. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	
286	• Contractors should be made aware of the WUL conditions that apply during construction and made liable for environmental damages caused by spillages.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
287	• Emergency action plans should be drawn up to deal with spillages.	• The Incident Management Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Incident Management Procedures also refers to Incident action plans. • The Hydrocarbon Management Procedure states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.'	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	☑
288	• Chemical toilets should be provided at construction sites.	• Male and female ablution facilities are provided throughout the site (26/06/25).	• Photo 29	☑
289	• Rehabilitation should include ripping of compacted soils and revegetation of ripped and other disturbed areas.	• Various areas of completed and active rehabilitation were observed on site using Kaytech Enviromat® to conserve moisture, hold seeds and soil in place, prevent erosion and provide space for plant propagation and growth. • The Agreenco rehabilitation progress reports refer to preparation and scarification of areas prior to seeding.	• Photo 9 depicts the concurrent rehabilitation on disturbed slopes • Agreenco Progress Reports (Jan and Apr 2025)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface Water: *Reduced availability of water to downstream users due to obstruction of flow at crossings.*				
290	• Stormwater culverts at watercourse crossings should be designed and constructed to accommodate the 1:50 year storm event. Erosion protection and energy dissipaters should be constructed at the crossings as applicable.	• The Der Brochen FS Water Management Report describes the designs in line with GN704: o stormwater channels, sumps, settling ponds, service water dam and PCD o culverts have been designed in order to accommodate the 1:100 year flood event. • The FS Water Management Report states that the inlet structure and outlet structures to these culverts are designed in such a way to reduce the potential of water erosion along the water course. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑
Air Quality: *This phase will comprise of land clearing, compacting and grading. These activities will have dust impacts.*				
291	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Social: *<u>Physical quality of the living environment.</u> Impacts such as noise and dust are expected to occur from trucks and machinery making use of the unsealed/gravel roads. This activity may have an impact on social well-being of communities near the activities.*				
292	• Implement social incident management procedure including the existing grievances to capture community and stakeholder concerns and grievances regarding environmental impacts Bonfires and burning of waste materials should be prohibited; Where practicable, stockpiles of soils and materials should be located as far as possible from sensitive receptors, taking account of prevailing wind directions and seasonal variations in the prevailing wind. Wherever feasible, construction traffic should avoid sensitive roads (residential roads, congested roads, via unsuitable junctions, etc.) and that vehicles are kept clean and sheeted when on public roads; Timing of any large-scale vehicle movements to avoid peak hours on the local road network would also be beneficial; and Vehicle speeds (especially on unpaved roads) should be reduced so as to limit the re-entrainment of dust. Implement Der Brochen's Emergency Preparedness Plan to communicate with communities regarding ways in which to respond during emergencies.	• The Incident Management Procedure addresses social incidents and grievances and steps to manage these. • A grievance register is kept for the Mototolo Complex, including Der Brochen. • All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/ sorting areas, from where it is removed off-site to recycling facilities or registered landfills. • Construction vehicles are restricted to the main access and haul roads. • There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions. • The Mototolo Complex External Emergency Management Plan address various emergencies and the affected/vulnerable communities.	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • 2025 Mototolo Complex Grievance Register • Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations • Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001)	☑
Social: *<u>Health and social well-being.</u> Public and workforce-related health impacts due to dust/air pollution and noise pollution associated construction vehicles and machinery on site particularly during clearing for the construction of the gravel roads. Noise pollution may be generated if blasting is required for the construction of the ventilation shafts.*				
293	• Environmental pollution (noise, dust, etc.) must be limited as far as possible and the requirements of the EMP be implemented to reduce the impact on surrounding residents. The necessary safety precautions should be taken, and first aid supplies should be made available on site; All project employees (including contractors) should undergo health and safety training on induction and thereafter on a regular basis; Instruct contractors on how to work in line with the health and safety document and site rules; and Appoint a Health and Safety representative.	• Noise monitoring is undertaken at the Der Brochen South Shaft construction site boundary. • Equipment is maintained as per the OEM schedule. • Where noise exceeds 85 dBA on site, mandatory hearing protection signs are displayed. • Evidence of wet suppression during the site audit. • H&S training forms part of the inductions for employees, contractors and visitors. • Employees and contractors undergo ongoing H&S training as per their training schedules. • H&S site rules are displayed on site and emphasised in Toolbox Talks. • A Health & Safety Representative was appointed for the Der Brochen Mine.	• Der Brochen Annual Noise Monitoring Report, SLR (07/10/24) • Photo 30: PPE - hearing protection sign • Photo 8: Dust suppression on site • Visitors' Induction (18/06/25) • Site interviews (26/06/25) • Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic • Appointment letter of the Health and Safety Representative for the Earth Works and Bulk Civils at the Der Brochen Project (05/07/23)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Traffic: *This will result in an increase of heavy and light vehicle traffic on the internal roads when traveling to and from the roads that are being constructed. The impact of these vehicles will be very low in terms of traffic as the number of vehicles is not excessive.*				
294	• The mine has prepared a Transport Management Plan which indicates that all traffic must abide by the speed limit (40km/h) and traffic signs are clearly visible.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
295	• If the gravel roads are in poor condition, the mine will gravel and compact the roads.	• The gravel roads were observed to be in good condition.	• Site audit observations (26/06/25)	☑
296	• The maintenance of internal roads will be carried out on an ongoing basis.	• The Traffic Management Procedure states: '*All tarred and concreted roads must be inspected on a 3 monthly basis and all other roads must be inspected on a monthly basis by the Responsible Officer in accordance with the task list.*' • The internal roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030) • Site audit observations (26/06/25)	ⓘ
Upgrading of existing gravel roads to tar roads to serve as main access roads				
Soils, Land Use and Land Capability: *Movement of heavy machinery / construction vehicles off existing/demarcated roads, leading to soil compaction and potential spillage from machinery / construction vehicles.*				
297	• Compacted soils adjacent to the mining blocks and associated infrastructure footprint can be lightly ripped to at least 25 cm below ground surface to alleviate compaction prior to re-vegetation.	• Areas handed over by the construction team have been/are being rehabilitated. • The Agreenco rehabilitation progress reports refer to preparation and scarification of areas prior to seeding.	• Conservation Manager interviews and follow-up emails • Agreenco Progress Reports (Jan and Apr 2025)	☑
Surface Water: *Deterioration of surface water quality due to erosion, spillages and accidental discharges at conveyor or road crossings.*				
298	• Construction should take place in the low flow period (dry season). Areas disturbed by linear construction activities should be rehabilitated immediately on completion of construction of each area. Erosion protection and energy dissipaters should be constructed at the crossings as applicable. Contractors should be made aware of the WUL conditions that apply during construction and made liable for environmental damages caused by spillages.	• According to past audit reports and the Nov 2024 SRK ECO Report, construction activities were initiated during the dry season (Apr 2022), but are continuing throughout the year. • Areas handed over by the construction team have been/are being rehabilitated as soon as accessible. • The slopes and area adjacent to the services corridor will be rehabilitated as soon as construction is completed. • The FS Water Management Report states that the inlet structure and outlet structures to these culverts are designed in such a way to reduce the potential of water erosion along the water course.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • *This commitment should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine* • Agreenco Progress Reports (Jan and Apr 2025) • Photos 9 and 10 • Der Brochen FS Water Management Report (14/09/20) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
298 con	Contractors should be made aware of the WUL conditions that apply during construction and made liable for environmental damages caused by spillages. Emergency action plans should be drawn up to deal with spillages. Chemical toilets should be provided at construction sites. Rehabilitation should include ripping of compacted soils and revegetation of ripped and other disturbed areas.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings. • The Incident Management Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Incident Management Procedures also refers to Incident action plans. • The Hydrocarbon Management Procedure states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.' • Male and female ablution facilities are provided throughout the site (26/06/25). • Areas handed over by the construction team have been/are being rehabilitated. • The Agreenco rehabilitation progress reports refer to preparation and scarification of areas prior to seeding.	• Weekly Safety Meeting Attendance Register (07/05/25) • Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Photo 29 • Conservation Manager interviews and follow-up emails • Agreenco Progress Reports (Jan and Apr 2025)	
Surface Water: *Reduced availability of water to downstream users due to obstruction of flow at crossings.*				
299	• Stormwater culverts at watercourse crossings should be designed and constructed to accommodate the 1:50 year storm event.	• The FS Water Management Report states that these culverts have been designed in order to accommodate the 1:100 year flood event.	• Der Brochen FS Water Management Report (14/09/20)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
300	• Erosion protection and energy dissipaters should be constructed at the crossings as applicable.	• The FS Water Management Report states that the inlet structure and outlet structures to these culverts are designed in such a way to reduce the potential of water erosion along the water course. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑
Air Quality: *Grading of the existing haul road to prepare the surface for tar will give rise to dust impacts..*				
301	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
Social: *Health and social well-being. Impacts such as noise and dust are expected to occur from construction trucks and machinery during the road upgrades. In addition to this, the health and safety aspects of the surrounding communities need to be considered specifically with regards to access roads which may be constructed off or not confined to the mine's property. The hazards associated with the construction of the access roads are therefore more easily accessed by community members, members of the general public and road users..*				
302	• Environmental pollution (noise, dust, etc.) must be limited as far as possible and the requirements of the EMP be implemented to reduce the impact on surrounding residents.	• Noise monitoring is undertaken at the Der Brochen south shaft construction site boundary. • Equipment is maintained as per the OEM schedule. • Where noise exceeds 85 dBA on site, mandatory hearing protection signs are displayed. • Evidence of wet suppression during the site audit.	• Der Brochen Annual Noise Monitoring Report, SLR (07/10/24) • Photo 30: PPE - hearing protection sign • Photo 8: Dust suppression on site	☑
303	• The necessary safety precautions should be taken, and first aid supplies should be made available on site.	• The Mototolo Complex has various Safety and Health Procedures addressing safety precautions and first aid, such as the External Emergency Management Plan. • Safety signage, emergency contact numbers, responsible first aiders on site with contact details, were all observed on site during the audit.	• Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001) • Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic • Photo 35: WBHO Laydown designated walkway, Fire Safety Rules Sign and Fire Extinguisher • Photo 36: WBHO Notice Board: Responsible First Aider and SHE Rep	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
304	• All project employees (including contractors) should undergo health and safety training on induction and thereafter on a regular basis.	• H&S training forms part of the inductions for employees, contractors and visitors. • Employees and contractors undergo ongoing H&S training as per their training schedules.	• Visitors' Induction (18/06/25) • Site interviews (26/06/25)	✓
305	• Instruct contractors on how to work in line with the health and safety document and site rules.	• H&S site rules are displayed on site and emphasised in Toolbox Talks.	• Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic	✓
306	• Appoint a Health and Safety representative.	• A Health & Safety Representative was appointed for the Der Brochen Mine.	• Appointment letter of the Health and Safety Representative for the Earth Works and Bulk Civils at the Der Brochen Project (05/07/23)	✓
Traffic: *This will result in an increase of heavy and light vehicle traffic on the internal roads when traveling to and from the roads that are being upgraded to asphalt. The impact of these vehicles will be very low in terms of traffic as the number of vehicles is not excessive.*				
307	• The mine will maintain the internal roads.	• The internal roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	ⓘ
308	• Gravel roads will be regraded and compacted.	• The gravel roads were observed to be in good condition.	• Site audit observations (26/06/25)	✓
309	• Asphalt roads will undergo pothole repair and resurfacing where necessary.	• The Traffic Management Procedure states: '*All tarred and concreted roads must be inspected on a 3 monthly basis and all other roads must be inspected on a monthly basis by the Responsible Officer in accordance with the task list.*' • The asphalt roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	ⓘ
310	• The maintenance of internal roads will be carried out on an ongoing basis.	• The internal roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	ⓘ
Generation of construction waste				
Flora: *Disposal of construction related waste material in the surrounding habitat.* ***Soils, Land Use and Land Capability:*** *Potential indiscriminate disposal of hazardous and non-hazardous materials wastes within freshwater resources, leading to Altered water quality, possible changes to flow patterns as a result of blockages caused by solid wastes/rubble.*				
311	• A waste management plan will be developed for the construction phase.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/ sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	✓

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
312	• Sorting of solid waste into recyclable and non-recyclable waste streams will be undertaken.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/ sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	☑
313	• Storage of domestic and hazardous waste will be undertaken within designated waste storage facilities.	• Evidence of domestic waste separation bins, industrial and hazardous waste skips were observed on site. • Waste is only temporarily stored at the Der Brochen South construction area, from where it is collected, and processed and disposed of off-site.	• Photo 7: Domestic and industrial waste receptacles Photo 40: Hazardous waste skips	☑
314	• The waste storage area must be clearly marked with signage boards and fenced off.	• Mototolo Complex has a Waste Management Licence (WML) for the Borwa and Lebowa Salvage Yards, the area is fenced off and marked with signage boards.	• Site audit observations (26/06/25)	☑
315	• Waste will be removed off site by a licensed contractor to a suitable licensed facility.	• Waste Legends are currently appointed as the licenced waste removal contractor. • Various waste manifests were received as proof of disposal at suitable licenced facilities.	• Photo 41: Waste manifest for hazardous waste • Photo 42: Waste Manifest for scrap wood • Photo 43: Waste Manifest for used oil	☑
316	• All construction related waste and material is to be disposed of at a registered waste facility.	• Various waste manifests were received as proof of disposal at suitable licenced facilities.	• Phots 41, 42 and 43	☑
317	• No waste of construction rubble is to be dumped in the freshwater features or surrounding habitats.	• No evidence of illegal dumping was observed.	• Site audit observations (26/06/25)	☑
318	• Burying or burning of any waste including rubble, domestic waste, empty containers on the site will be strictly prohibited and all construction rubble waste must be removed to an approved disposal site.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips/boxes) prior to transport to the salvage yards, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various waste receptacles observed on site	☑
319	• Provide sufficient on-site ablution, sanitation and waste management facilities.	• Male and female ablution facilities are provided throughout the site (26/6/25).	• Photo 29	☑

Table 4: Der Brochen Amendment Project EIAR & EMPr (Nov, 2019) Compliance Audit Results - Operational Activities

#	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
TABLE 10-5: OPERATIONAL ACTIVITIES, ANTICIPATED IMPACTS AND RECOMMENDED MITIGATION MEASURES				
Temporary hauling of ore from shafts to Mototolo Concentrator along the corridor associated with the Ore Conveyor System (whilst conveyor system is being constructed)				
Flora: *Dust generation during operational activities leading to a loss of floral habitat*				
320	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
321	• Der Brochen will continue with the air quality monitoring programme.	• Dust buckets are located north and south of the Der Brochen South Shaft construction area. • The closest dust bucket (S3) just northwest of the Mine, recorded dust fallout well below the allowable industrial limit of 1 200 mg/m²/day: namely 135 mg/m²/day average for 2024 and 281 mg/m²/day average for Jan-May 2025.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GCS)	☑
322	• If the results of the air quality management programme (dust fallout) indicate more than two exceedances in a year, or exceedance in two consecutive months, a dust management plan will be developed and be implemented.	• This condition is stated in the Air Quality Management Regulations (AQMRs) in line with the "National Dust Control Regulations" (GN R827). • These non-compliances were not triggered at the Der Brochen dust buckets during 2024 nor 2025 to date.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GSC)	ⓘ
Fauna: *Movement of vehicles between infrastructure areas can potentially lead to increased risk of faunal species collisions with vehicles.*				
323	• Vehicles are to utilise the existing roads only.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Environmental Officer and Conservation Manager interviews (26/06/25) • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	☑
324	• Speed restrictions to be placed on all vehicles within the focus area to limit faunal and vehicle collisions.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
325	• Drivers to be educated about the presence and importance of faunal species and instructed to actively avoid of collisions with faunal species.	• Construction vehicles are restricted to the main access and haul roads. • The Environmental Inductions state that harming of faunal species are prohibited.	• Site interviews and audit observations (26/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
	Fauna: *Increased personnel on site leading to possible poaching and increased risk of uncontrolled fires. Further loss of faunal habitat and species as a result of edge effects and operational footprint creep. Alien plant proliferation within disturbed areas.*			
326	• The footprint and daily operation of these structures must be strictly monitored to ensure that footprint creep and edge effects does not affect the surrounding sensitive faunal habitat.	• The site perimeter was pegged prior to construction and site creep is continuously monitored by the Environmental Officer.	• Site audit and interviews (26/06/25)	✓
327	• Restrict vehicles to travelling only on designated roadways to limit the ecological footprint of the proposed development.	• The site construction team are continuously advised by the environmental department that no disturbances outside the Mine footprint is allowed.	• Environmental Officer interview (26/06/25)	✓
328	• No indiscriminate driving through the veld is allowed.	• Construction vehicles are restricted to the main access and haul roads.	• Site interviews and audit observations (26/06/25)	✓
329	• Ensure that the ephemeral drainage lines are demarcated as no go zones for personnel and mine vehicles.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• *This commitment should be rephrased in the EMPr to signposted, as demarcation of sensitive habitats through fencing, would cause additional disturbance.*	✓
330	• No faunal species may be hunted, trapped, snared or captured for any purpose whatsoever.	• The Environmental Inductions state that harming of faunal species are prohibited.	• Environmental Officer interview (26/06/25) • 2024 External Compliance Audit finding	✓
331	• Fences and boundaries must be monitored on a weekly basis in order to locate and remove snares and traps.	• The total Complex area is divided into fence zones that are formally assessed on a quarterly basis with "hotspot" areas inspected on a bimonthly basis. *Ad hoc* inspections are also conducted as part of the day-to-day activities of the land team. Fence inspection forms are completed during this process that indicates the locality and type of maintenance and presence of snares.	• Fence Zone Map • Completed Der Brochen Mine Fence Inspection Forms • *This commitment is not feasible and should be updated in the EMPr, as perimeter fence inspections take two weeks to complete due to the extent of the property boundary.*	N/A
332	• Prevent all open fires.	• Designated smoking areas were observed on site. • The WBHO Information Board had an RPM Fire Safety Topic for Jun 2025 displayed.	• Photo 5 • Photo 6	✓
333	• Provide fire safe zone facilities and suitable fire control measures.	• Designated smoking areas were observed on site. • The WBHO Information Board had an RPM Fire Safety Topic for Jun 2025 displayed.	• Photo 5 • Photo 6	✓
334	• Use of trees, shrubs or any vegetation for fire making purposes is strictly prohibited.	• The site Environmental Inductions specify that the collection of firewood and plant species are prohibited.	• Site Interviews (26/06/25)	✓

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
335	• A Fire Management Plan (FMP) will be set in place to ensure that any fires that do originate can be managed and / or stopped before the significant damage to the environment occurs.	• The ERT is responsible for fire brakes across the Mototolo Complex. The focus is on infrastructure safeguarding as well as grazing management. Annual burnt areas across the property are tracked. • Firebreaks will be burnt around the infrastructure (Conservation Manager interview on 26/06/25).	• Guidance Note on Controlled Burn and Fire Breaks (2025) • Fire Burning Permit (13/06/25)	☑
336	• The mine will Implement an alien and invasive plant control plan.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • Various Agreenco reports provide proof of IAP eradication on the Der Brochen footprint.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Service Acceptance Letter (26/05/25) and Progress Reports (12/09/23, 28/06/23 and 26/07/23)	☑
Fauna: *Increased ambient lighting will result in the attraction of insects and insectivorous predators. This may result in the increased risk of injury or mortality rates to such species either from collision with operational machinery and vehicles, or as a result of direct human conflict.*				
337	• Lighting pollution and its effect on fauna (with special mention of invertebrates, bats and avifauna) must be effectively mitigated with the following guidelines in mind and with due cognizance taken of health and safety requirements: o Downward facing lights must be installed and limited to absolutely essential areas. o Covers/light diffusers must be installed to lessen the intensity of illumination where possible. o Outside lights are to utilise bulbs of varying wave lengths that do not attract insects. o As far as possible unnecessary lighting should be avoided/switched off at night, leaving only that which is essential for continued mining operation on.	• Evidence of downward facing lights with covers were observed on the conveyor within the services corridor, which is currently under construction.	• Site interviews and audit observations (26/06/25) • Photo 44: Lighting along the conveyor	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface Water: *Deterioration of surface water quality due to erosion, spillages and accidental discharges at conveyor or road crossings.*				
338	• Erosion protection and energy dissipaters should be maintained at the crossings as applicable.	• The FS Water Management Report states that the inlet structure and outlet structures to these culverts are designed in such a way to reduce the potential of water erosion along the water course. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑
339	• Contractors should be made aware of the WUL conditions that apply during transfer of ore and/or materials and made liable for environmental damages caused by spillages.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑
340	• Emergency action plans should be drawn up to deal with spillages.	• The Incident Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Incident Management Procedure also refers to Incident action plans. • The Hydrocarbon Management Procedure states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.'	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	☑
Surface Water: *Reduced availability of water to downstream users due to obstruction of flow at crossings.*				
341	• Stormwater culverts at watercourse crossings should be designed and constructed to accommodate the 1:50 year storm event.	• The FS Water Management Report states that these culverts have been designed in order to accommodate the 1:100 year flood event.	• Der Brochen FS Water Management Report (14/09/20)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
342	• Erosion protection and energy dissipaters should be constructed at the crossings as applicable.	• The FS Water Management Report states that the inlet structure and outlet structures to these culverts are designed in such a way to reduce the potential of water erosion along the water course. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	
Air Quality: *Vehicle entrainment from haul trucks will have particulate impacts.*				
343	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	
344	• Der Brochen will continue with the air quality monitoring programme.	• Dust buckets are located north and south of the Der Brochen South Shaft construction area. • The closest dust bucket (S3) just northwest of the Mine, recorded dust fallout well below the allowable industrial limit of 1 200 mg/m²/day: namely 135 mg/m²/day average for 2024 and 281 mg/m²/day average for Jan-May 2025.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GCS)	
345	• If the results of the air quality management programme (dust fallout) indicate more than two exceedances in a year, or exceedance in two consecutive months, a dust management plan will be developed and be implemented.	• This condition is stated in the AQMRs in line with the "National Dust Control Regulations" (GN R827). • These non-compliances were not triggered at the Der Brochen dust buckets during 2024 nor 2025 to date.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GSC)	
346	• Due to the close proximity of sensitive receptors to the project, it is recommended that the temporary haul road be watered providing a 75% control efficiency, the conveyor be covered providing a 65% control efficiency.	• Evidence of wet suppression during the site audit. • The conveyor, which is currently under construction, is covered. • Control efficiencies are not measured during dust suppression.	• Photo 8: Dust suppression • Photo 45: Conveyor • *It is recommended that this condition in the EMPr is rephrased to be more practically implementable, such as monitoring of a visual dust plume.*	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Traffic: *The hauling of ore will result in an increase of heavy vehicle traffic on the internal road network from the shafts to the concentrator. The impact of these heavy vehicles will be very low in terms of traffic as the number of vehicles is not excessive..*				
347	• The mine has prepared a Transport Management Plan which indicates that all traffic must abide by the speed limit (40km/h) and traffic signs are clearly visible.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
348	• If the gravel roads are in poor condition, the mine will gravel and compact the roads.	• The gravel roads were observed to be in good condition.	• Site audit observations (26/06/25)	☑
349	• The maintained of internal roads will be carried out on an ongoing basis.	• The internal roads are still under construction, but will be monitored and maintained once completed.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	ⓘ
Noise: *Additional traffic noise at 200m from the access roads will be 45.6dBA and the prevailing ambient noise levels during the day was 48.7dBA and 49.8dBA during the night. The traffic noise will not be audible at the abutting noise receptors.*				
350	• The speed limit along the roads of 40km/h to be adhered to at all times.	• There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25). • Speed limits are also discussed during inductions.	• Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations	☑
Stockpiling of ore material at Mototolo Concentrator				
Air Quality: *Windblown dust form stockpiled material.*				
351	• The mine will implement adequate wet suppression techniques to limit dust release.	• Evidence of wet suppression during the site audit.	• Photo 8	☑
352	• Der Brochen will continue with the air quality monitoring programme.	• Dust buckets are located north and south of the Der Brochen South Shaft construction area. • The closest dust bucket (S3) just northwest of the Mine, recorded dust fallout well below the allowable industrial limit of 1 200 mg/m²/day: namely 135 mg/m²/day average for 2024 and 281 mg/m²/day average for Jan-May 2025.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GCS)	☑
353	• If the results of the air quality management programme (dust fallout) indicate more than two exceedances in a year, or exceedance in two consecutive months, a dust management plan will be developed and be implemented.	• This condition is stated in the AQMRs in line with the "National Dust Control Regulations" (GN R827). • These non-compliances were not triggered at the Der Brochen dust buckets during 2024 nor 2025 to date.	• 2024 Annual and 2025 monthly Air Quality Monitoring for Mototolo / Der Brochen Complex (GSC)	ⓘ

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Utilisation of storm water management and pollution control infrastructure at shafts, and PCDs at DMS stockpile				
Surface Water: *The need to capture and contain dirty water will increase the volume of contaminated water that needs to be managed on the mine. Release of dirty water can occur if the containment facilities are not appropriately managed or during periods of extended high rainfall. Overflow from the dirty water containment facilities can result in the formation of channels and the formation of drainage lines resulting in the water reaching the Groot Dwars River and/or the Mareesburg Stream (DMS Stockpile Phase 3 only). Such overflows and runoff can have a detrimental impact on surface water quality and result in a loss of availability of drinking water to the downstream community.*				
354	• Appropriately placed clean water diversions, designed to handle the AAP requirements should be constructed to divert water away from the DMS Stockpile.	• The WBHO Temporary SWMP states that the Haul Road Terrace culvert, South Shaft storm water cut off trench attenuation pond and the Haul Road culvert crossings 1-9 were implemented to divert clean water around the infrastructure and tie into the permanent site SWMP.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
355	• Energy dissipaters should be constructed at points where there are concentrated discharges of water to the environment that could cause significant erosion and within water channels to slow the speed of water.	• The FS Water Management Report states that the spillways will be constructed with energy dissipaters to prevent erosion downstream of these ponds. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑
356	• During normal operations dirty water should be contained in pollution control dams designed to handle the 1:50 year event and enable settlement of solids in the contained water prior to reuse.	• The Der Brochen FS Water Management Report describes the designs in line with GN704: o stormwater channels, sumps, settling ponds, service water dam, PCD (1:50 yr flood and 0.8 m freeboard).	• Der Brochen FS Water Management Report (14/09/20)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
357	• Manage the overall water on site to fully utilise the storage available on site for example, don't discharge from the PCD dams if there are other dams available.	• This will be the managed once all the dams are fully operational. • DWS were notified of a controlled release of stormwater at Der Brochen on 0702/25 due to lack of available storage capacity at the various dams at the Der Brochen site, resulting from excessive rainfall and groundwater recharge - the controlled discharge was necessary to avoid a dam break and uncontrolled release of water. • The PCD for the South Shaft is currently under construction downstream of the working activities. • The North PCD has been constructed and was observed to be in use at the time of the inspection.	• Photo 16	
Surface Water: *Reduced availability of water to downstream users due to containment of dirty water and alteration of catchment hydrology (volume). The rainfall that falls within this area will be removed from the catchment and may reduce the quantity of water available to downstream users. The probability that the impact will be contained to the site and will occur for the duration of the project is definite. Therefore, this impact is rated as having a moderate significance. However, loss of MAR due to dirty water containment is considered of LOW significance to the B41G catchment (refer to Section 6.4) but will remain locally at Moderate.* *Erosion and scouring of water courses at diversion outlets due to stormwater runoff from the mine.* ***Groundwater:*** *Change of the ambient groundwater quality due to seepage and run-off from DMS stockpile. Geochemical results indicate that the DMS material to be stockpiled is non-acid generating. Leach test results suggest limited impacts of seepage from the DMS stockpile.* ***Soil Land Use and Land Capability:*** *Presence of clean and dirty separation infrastructure around upstream areas of DMS stockpile.*			
358	• Maintain all water management structures so that only dirty water is contained, and clean water is diverted to the natural environment.	• The WBHO Temporary SWMP states that the Haul Road Terrace culvert, South Shaft storm water cut off trench attenuation pond and the Haul Road culvert crossings 1-9 were implemented to divert clean water around the infrastructure and tie into the permanent site SWMP. • Dirty runoff is currently directed to the Mine settling ponds and then the service water dam, from where it is reused underground. • The PCD for the South Shaft is currently under construction downstream of the working activities. • The North PCD has been constructed and was observed to be in use at the time of the inspection.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
359	• Clean and dirty water separation systems must be constructed and be maintained to contain spills/leaks. All dirty water containment facilities will be adequately lined to prevent seepage.	• The WBHO Temporary SWMP states that the Haul Road Terrace culvert, South Shaft storm water cut off trench attenuation pond and the Haul Road culvert crossings 1-9 were implemented to divert clean water around the infrastructure and tie into the permanent site SWMP. • The settling dams are concrete lined and the Mine Service Water Dam and North PCD are lined with HDPE overlain by shotcrete. • The South Shaft PCD was still under construction at the time of the inspection, however the HDPE liner for the dam basin was observed next to the PCD.	• Photo 46: HDPE liner for the PCD	☑
360	• All facilities with the potential to generate dirty storm water runoff, effluent or washdown water will be located within the designated dirty water area.	• The Der Brochen FS Water Management Report states that the stormwater management on the South Shaft Complex has been divided into two categories, namely clean and dirty (contact) water. The clean stormwater is defined as any stormwater that has not yet had contact with the mining areas. Stormwater that has had contact with any of the workshops, storage yards, decline complex or the conveyor, is classed as dirty water. • The south portal clean stormwater cut-off diversion channel and terrace stormwater drain were constructed upstream of the shaft complex to divert stormwater back to the Groot Dwars River. • Dirty runoff is/will be captured the settling ponds, service water dam and PCDs on site.	• Site interviews and audit observations (26/06/25)	☑
361	• Clean runoff will be diverted around the designated dirty areas by means of cut-off canals, sized to accommodate at least the 1:50 year peak flow event.	• The Der Brochen FS Water Management Report describes the designs in line with GN704: the clean water cut-off diversion is designed for a 1:50 year recurrence interval and 24-hour event. • SRK confirmed that the design criteria for the clean water channels are for a 1:50 year event.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25)	☑
362	• Weekly inspections of stormwater canals and dirty water containment facilities must be undertaken.	• Weekly internal (RPM Environmental Officer) and monthly external (SRK Consulting) ECO inspections are undertaken assessing EMPr compliance for Der Brochen.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov 2024)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
363	• When incidents are identified (such as spills, blockage, siltation, etc.), undertake the necessary actions to mitigate.	• The Incident Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Incident Management Procedure also refers to Incident action plans. • The Hydrocarbon Management Procedure states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.'	• Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	☑
364	• Energy dissipaters should be constructed in areas of concentrated flows.	• The FS Water Management Report states that the spillways will be constructed with energy dissipaters to prevent erosion downstream of these ponds. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas. • Gabions have been and are being constructed at the culverts where erosion was noted to capture excess silt.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • Photo 11 shows the energy dissipators and gabions constructed to prevent erosion and act as sediment traps at the culverts at the road crossings	☑
365	• Der Brochen will continue to implement the surface water and groundwater monitoring programme.	• GCS Water and Environmental (Pty) Ltd (GCS) conducts quarterly monitoring at Der Brochen, including: groundwater levels and quality, drinking water quality, surface water flow and quality.	• 2024-2025 Water Monitoring Reports	☑
Dangerous Goods storage and handling (including hydrocarbons/chemicals/explosives)				
All aspects: *Storage of chemicals may lead to contamination of soil and water as well as minor gaseous emissions. Hydrocarbon spillages from vehicles has the potential to contaminate soil, surface water, groundwater and ecology if not managed.*				
366	• The mine will develop and maintain a Standard Operating Procedure to contain and remediate any accidental hydrocarbon or other chemical spillages.	• The Hydrocarbon Management Procedure describes spill management.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
367	• A spill prevention and emergency spill response plan must be developed and be implemented in order to address clean-up measures should a spill and/or a leak occur.	• Various spill kits were observed on the construction site (26/06/25). • The Incident Management Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Procedure also refers to Incident action plans. • The Hydrocarbon Management Procedure states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.'	• Photo 28 • Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007)	☑
368	• Clean and dirty water separation systems must be constructed and be maintained to contain spills/leaks.	• The south portal clean stormwater cut-off diversion channel and terrace stormwater drain were constructed upstream of the shaft complex to divert stormwater back to the Groot Dwars River. • Dirty runoff is/will be captured the settling ponds, service water dam and PCDs on site.	• Der Brochen FS Water Management Report (14/09/20)	☑
369	• All facilities with the potential to generate dirty storm water runoff, effluent or washdown water will be located within the designated dirty water area.	• The Der Brochen FS Water Management Report states that the stormwater management on the South Shaft Complex has been divided into two categories, namely clean and dirty (contact) water. The clean stormwater is defined as any stormwater that has not yet had contact with the mining areas. Stormwater that has had contact with any of the workshops, storage yards, decline complex or the conveyor, is classed as dirty water.	• Der Brochen FS Water Management Report (14/09/20)	☑
370	• Clean runoff will be diverted around the designated dirty areas by means of cut-off canals, sized to accommodate at least the 1:50 year peak flow event.	• The Der Brochen FS Water Management Report describes the designs in line with GN704: the clean water cut-off diversion is designed for a 1:50 year recurrence interval and 24-hour event. • SRK confirmed that the design criteria for the clean water channels are for a 1:50 year event.	• Der Brochen FS Water Management Report (14/09/20) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
371	• Adequate erosion protection will be provided at the clean canal discharge locations.	• Significant erosion was observed at the south portal clean stormwater cut-off diversion channel's southern discharge point during the audit. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas.	• Photo 47: Erosion at the southern discharge point • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25) • According to interviews with the engineer, designs are underway to address these additional energy dissipaters.	✗
372	• Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.	• The Hydrocarbon Management Procedure describes bund and settlement requirements. • Some compliant areas were observed: o temporary workshop is surfaced o WBHO oils storage in an impermeable container o sump at equipment washing bay o self-bunded diesel storage tank on a hardstand. • Various non-compliances were observed: o no containment or settlement facilities at the temporary workshop o washing of hydrocarbon contaminated equipment at the temporary workshop on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Compliant: o Photos 18 - 21 • Non-compliant: o Photos 22 - 27	✗
373	• Bund sizing will be done at 110% of the largest tank volume minus the volume occupied by any adjacent tanks in the same bund in accordance with SANS 10089-1, with an allowance of an additional 300 mm used for ballast stones placed in the tank bunds.			✗
374	• Dedicated parking areas for construction vehicles must be located away from the delineated watercourses and the 100 m zone of regulation (ZoR) GNR 704.	• The final construction site layout plan depicts dedicated Employee and Visitors' Parking, as well as workshop TMM parking bays and dedicated grader parking.	• South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24)	✓
375	• Drip trays must be located beneath any parked and leaking equipment along with lubricant/fuel absorbing media (moss type products, sawdust) within the drip trays to contain spilled material.	• Equipment parked with either no drip trays or inadequately sized drip trays were observed during the audit.	• Photo 26 shows a wacker and bowser parked on bare ground without drip trays	✗

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
376	• Vehicles to be regularly inspected for leaks and to be refuelled on sealed surface to prevent ingress.	• All vehicles and equipment are inspected in accordance with the OEM schedule and repaired as required.	• Site audit interviews (26/06/25)	☑
377	• Spill-sorb or a similar product will be kept on site and used to clean up hydrocarbon spills in the event that they should occur.	• The Hydrocarbon Management Procedure describes spill management. • Various spill kits were observed on the construction site (26/06/25).	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Photo 28	☑
378	• All pipeline routes will be inspected on a weekly basis to enable early detection of leaks.	• No pipelines have been constructed to date, but this condition is noted for the services corridor.	• Site audit observations (26/06/25)	ⓘ
379	• Washdown and wastewater from the plant and workshops will be passed through oil skimmers before discharging to the storm water system for containment in the PCD and eventual treatment for reuse or pumping to existing storm water management infrastructure.	• The permanent workshop design includes a 3-stage oil water separator tank system to collect the dirty water from both the wash bay and oil storage area - this will be audited once the workshop has been constructed and is operational. • All dirty runoff from site is/will be captured the settling ponds, service water dam and PCD on site. • The PCD for the South Shaft is currently under construction downstream of the working activities. • The North PCD has been constructed and was observed to be in use at the time of the inspection.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Photos 15-17 (dirty water dams)	ⓘ
380	• An inspection and maintenance plan will be implemented on the storm water system to ensure that all oil skimming and sediment handling facilities are maintained, and that storm water canals and pipelines remain unblocked and free flowing – monthly inspections will be carried out.	• No permanent stormwater management plan, nor an inspection and maintenance plan for the stormwater system has been developed to date.	• Site interviews and evidence review.	☒
381	• Continued implementation of the surface and ground water quality monitoring programme should be undertaken to detect any impacts.	• GCS Water and Environmental (Pty) Ltd (GCS) conducts quarterly monitoring at Der Brochen, including: groundwater levels and quality, drinking water quality, surface water flow and quality.	• 2024-2025 Water Monitoring Reports (GCS)	☑

#	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
382	• Existing emergency response contingency plan must be implemented to address clean-up measures should a spill and/or a leak occur.	• The Incident Management Procedure states that the incident response process applies to environmental releases and includes, if appropriate, the activation of the local emergency response plan and/or crisis management plan, summoning assistance, and securing the scene. The Procedure also refers to Incident action plans. • The Hydrocarbon Management Procedure states that: '*All spills greater than 20 litres must be reported to Supervisor/ Engineer/Safety Officer or the Environmental personnel as a Level 1 Environmental incident. The SHE department will classify the incident according to the volume spilt and degree of contamination to the environment*.' • The Complex Emergency Response Management Plan addresses: o Spillages of Tailings from the Transfer System o Environmental Incidents (including spillage)	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Mototolo Complex Incident Management and Reporting Procedure (MOTC-SHE-SHE-PRO-0007) • Mototolo Complex Emergency Response Management Plan, Valterra Platinum (MOTC-SHE-EME-MAN-0001)	☑

Table 5: Der Brochen Amendment Mine IEA (Nov, 2021) Compliance Audit Results

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
			IEA SITE SPECIFIC CONDITIONS		
383	**1**	• Protected plant species must not be removed (disturbed, cut and destroy their products which may not be possessed, collected, removed, transported, exported, donated, purchased, or sold) unless the necessary permission is granted by the Department of Agriculture, Forestry and Fisheries (DAFF).	• The RPM Environmental Manager and Officer obtained all the required permits for relocation of the SCC, and various permits were provided to the auditor as evidence.	• Department of Agriculture, Forestry and Fisheries (DAFF) Permit to cut, disturb, damage and destroy protected trees (2024-25), lists *Berchemia zeyheri*, *Sclerocarya birrea* and *Elaeondendron transvaalense* • DAFF Permit to cut, disturb, destroy or remove protected trees (2023-24), lists *Berchemia zeyheri, Lydenburgia cassinoides, Sclerocarya birrea* and *Elaeondendron transvaalense* (25/07/23) • Wildlife Trade and Regulation Permit: Pick protected plants on Der Brochen 7 JT: *Elephantorrhiza praetermissa*, LDEDET (12/12/22) • Wildlife and Trade Regulation Permit: Pick and Convey protected plants on Der Brochen 7 JT: *Elephantorrhiza praetermissa, Boscia foetida* and *Scadoxis puniceus* (25/02/22) • DAFF Permit to cut, destroy and/or transplant protected trees, lists *Lydenburgia cassinoides, Sclerocarya birrea* and *Elaeondendron transvaalense* (26/05/21) for the South Shaft Portal	☑
384	**2**	• All development footprint areas and areas affected by the proposed development must remain as small as possible and must not encroach onto the surrounding sensitive areas and the associated buffer zones.	• The Environmental Officer assisted the Conservation Manager in the site-pegging pre-construction and monitors site creep.	• Photo 1: Site demarcation peg • Environmental Officer interview (26/06/25)	☑
385	**3**	• Terms and conditions of the Integrated Water Use License (IWUL) obtained from the DWS must be adhered to.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑
386	**4**	• Wetland and riverine areas are to be considered as no go zones unless authorisation is obtained. Ensure that construction activities are outside demarcated wetland area. No activity should be allowed to encroach on to wetland system.	• The site perimeter was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Environmental Officer and Conservation Manager interviews (26/06/25)	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
387	**5**	• Rehabilitation of the environment affected by any activities undertaken must be committed on the approved EMPR.	• Areas handed over by the construction team have been/are being rehabilitated. • Various areas of completed and active rehabilitation were observed on site. • Indigenous plants are propagated in the nursery prior to being used in rehabilitation.	• Conservation Manager interviews and follow-up emails • Photo 2, 9 and 10 • Agreenco Progress Reports (Jan and Apr 2025) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	☑
ANNEXURE 2					
Conditions for the Der Brochen Mine additional new mining infrastructure as per the Water Use Licence No: 06/B41G/ABCGIJ/10965 Dated 30 September 2021					
Water Use Licence Site Specific Conditions					
388	**1.1**	• Numerical groundwater flow and mass transport model must be updated every two years to quantify and predict impacts of the proposed activities in more detail and with higher level of confidence.	• Delta-H was requested by the client to provide a cost outline for the annual groundwater model update to comply to the Der Brochen WUL conditions. Delta-H have been responsible for the development of the local refined Helena TSF and larger Mototolo/Der Brochen numerical groundwater flow and transport models. • The Delta-H Memo of Aug 2023 recommended biennial model updates; the next update is due in Aug 2025.	• Model Calibration and Update for the RPM mines Ltd Der Brochen Project, Delta-H Water Systems Modelling PTY (Ltd), Aug 2023 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
389	**1.2**	• Elevated salt load nitrate concentration must be carefully monitored for the entire lifespan of the mine guard contamination plume migrating downstream of the project area.	• An extensive network of monitoring boreholes is in place around the Mototolo Complex. These are sampled and analysed to determine potential impacts on water quality.	• Technical Memorandum - Monthly Monitoring Data, GCS, 2024 & 2025 • Der Brochen Water Abstraction Boreholes Report for the period Jul 2024-Dec 2024 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
390	**1.3.**	• Seepage capturing boreholes must be sited downstream using geophysics in order to detect the contamination plume migrating from mine residue deposits through the alluvial aquifer and must be applied in the groundwater model.	• This condition is noted for implementation prior to the commencement of the operational phase.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	ⓘ
391	**1.4**	• Seepage from the unlined TSF and RWD that has resulted in groundwater impacts and the migration of a contaminant plume towards the southern tributary of the Groot Dwars River and tributary east of the RDWB must be captured and monitored.	• Water is abstracted from the scavenger boreholes around the Helena TSF as authorised in the 2017 Mototolo Concentrator WUL.	• Mototolo Complex, Der Brochen and Mareesburg TSF Integrated Water and Waste Management Plan Update 2024 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
392	**1.5**	• The flow monitoring weirs must be fully developed to assess the impact on flow as they will monitor surface and groundwater intersections.	• Flow monitoring weirs have been fully developed.	• Site inspection observations and document review • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
393	**1.6**	• In the unlikely event that groundwater pollution detected by the monitoring system, groundwater remediation measures must be implemented without delay to migrate the groundwater quality impact.	• This condition is noted by the Mine. No groundwater pollution due to the Der Brochen Mine was detected during the audit period.	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
394	**1.7**	• Compensation must be undertaken by the licensee provided the surrounding groundwater users are affected by the activities taking place within the project area. This compensation must cover the maximum volume groundwater abstracted by the users on a daily basis.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
395	**1.8**	• Groundwater management plan must be practiced as indicated in the geohydrological report for all life phases of the mine.	• The groundwater management presented in the geohydrological report is incorporated into the Integrated Water and Waste Management Plan (IWWMP), which provides action plans for implementation at the site.	• Mototolo Complex, Der Brochen and Mareesburg TSF IWWMP Update 2024: EnviroGistics, 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
396	**1.9**	• Prior to and during re-flooding of the mine underground workings, the potential for groundwater mounding and rising of water levels close to surface must be closely monitored in boreholes sited in the modelled long term potential decant areas.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
397	**1.10**	• Implement groundwater remediation strategies and those developed for the post closure measures during operational phase of the mine and institute appropriate monitoring programmes in order to demonstrate the actual performance of the various management actions during the life of the mine, rather than after decommissioning.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
398	**1.11**	• This recommendation does not exempt the designer from complying with any other legislation. This review refers only to the activity as specified and described in the signed design report and drawings listed under documentation submitted for consideration.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
399	1.12	• One month's written notice must be given to the DWS before commencement of construction activities, such notice shall make clear reference to the site location details and the reference number of the project as indicated above and one month's written notice must be given to the DWS before commencement of the operational phase activities.	• The notification of the commencement of the licensed activities was submitted to the DWS on 4 Feb 2022, a month before the 8 Mar 2022 planned commencement date. • Construction is ongoing, therefore no notification of the commencement of the operational phase is required.	• 2024 Annual Water Use Licence Audit (WUL, 2021) Der Brochen Project: EnviroGistics, Sep 2024 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
400	1.13	• Deviation from accepted design: The license holder must notify the Department in writing, within 24 (twenty four) hours if any condition of this design and its acceptance cannot be, or is not, adhered to during construction and operation. The notification must be supplemented with reasons for non-compliance, and proposed rectification measures.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
401	1.14	• Design and construction record: Design and construction records, including topographical surveys and methodical materials test results (on all materials used),shall be maintained and archived and accessible for the life of the facilities (including decommissioning).	• Records of all studies and designs related to the site are kept by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
402	1.15	• Accountability: the authorities shall not be held responsible for any damages and losses suffered by the applicant or its successor intitle in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance by the applicant with the conditions of approval as set out in this document or any other subsequent document emanating from these conditions of acceptance.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
403	**1.16**	• Overtopping of PCDs (and or RWDs): the discharge of leachate or polluted water from the pollution control dam or process water dam to the environment (or similar non-compliant containment) is to be reported as an incident within 24 hours, and treated as such, with appropriate remediation.	• The DWS were notified, in a letter dated 7 Feb 2025 of the planned controlled release of water from the Mototolo Complex - Der Brochen Project. This controlled release of water from various dams at the site into the environment was required due to the lack of available storage capacity. The release of water was required to avoid potential dam failure resulting from the overtopping of the dams. • The notification letter listed the actions to be undertaken to prevent a similar incident, namely the completion of the construction of the South Shaft PCD and Mareesburg Pond 3, as well as the reduction of freshwater input from the Badirammogo Water User Association (BWUA), previously the Lebalelo WUA.	• Notification of controlled release at Der Brochen Projects, Mototolo Complex, 7 Feb 2025, Reference: SHE/DBS/2025/059 • Lebalelo Water User Association: Amendment of area of operation and change of name (Government Gazette No. 52691, 16 May 2025) • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
404	**1.17**	• Demarcation, cordons, barriers and warning systems: the facility manager must place and maintain cordons, barriers and warning systems around facilities to define the nature and extent of each disposal or waste management area, and avoid intersection of different waste types as per the NEMWA Regulations 2013.	• This condition is noted by the Mine. No formal waste management area has been developed yet.	• Site inspection observations • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
405	**1.18**	• Reporting to authorities on performance: All significant differences between predicted and actual performance of waste management facilities shall be reported to the authorities annually in writing.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
406	**1.19**	• Pollution Risk Assessment: Noting that the water pollution risk has been linked to an assessment of the solids only, and not related mining activities, the license holder shall monitor all point sources of deposits (Waste rock dumps etc) for water quality at the toe and immediately adjacent subsurface structures to confirm the water quality assumption of thresholds for elements are below LCTO values and comply with general discharge standards. Sampling shall be at least quarterly and reported to the Department annually.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
407	**1.20**	• Water availability: The use of groundwater assumes its availability, which is to be confirmed for the 5 year life time of mine, but shall not take preference over primary use nor human health and the licence review shall be confirmed by a water conservation and demand management plan for the project as defined in the above listed reports of 2021.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
408	**1.21**	• CQA and standard specification report: The SANS standard specifications incorporated in the design reports shall be revised to reflect the latest version thereof, in particular SANS1526 (2015) and SANS10409 (2020), similarly the license holder shall ensure that the three separate CQA plans for the components of the project shall at least meet the standard of the example CQA plan on the SAWIC website as advocated by the National Department of Forestry, Fisheries and Environment.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
409	**1.22**	• Construction completion report: The end of construction Engineers certificate of completion of work in accordance with the accepted design and associated conditions shall be provided to the authorities with supporting evidence as required by CQA protocols for written acceptance prior to disposal of waste. The Engineer's COC shall include a statistical summary of the test results, including number of tests, test method, minimum, maximum and mean values; standard deviation; number of failures and the reference to corrective action for failures. The test regime is as per the CQA plans and standard specifications referenced by the three design engineers for the three components of the project.	• This condition is noted by the Mine.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
410	**1.23**	• Instrumentation and Monitoring: The license holder shall install Instrumentation and monitoring protocols to confirm the design assumptions which influence performance of the contained barrier system. The monthly monitoring results shall be made available to the DWS Regional Manager annually or upon request.	• This condition is noted by the Mine for implementation during the operational phase.	• Document review and interviews with environmental personnel • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
			Water Monitoring		
411	**1**	• The licensee shall on monthly basis monitor water resource at monitoring points selected in consultation with the Provincial Head to determine the impact of the facility and other activities on the water quality by taking samples at the monitoring points described in table 8 and 9 of the WUL.	• All the surface water monitoring localities listed in Table 8 of the WUL are sampled on a monthly basis, with the exception of the South Shaft PCD, which is under construction, the DMS stockpile and PCD1 (*stockpile name changed to the Mareesburg stockpile, and the footprint will be used in future for stockpiling of various materials*), and the North PCD, which currently contains water. • Two of the three groundwater monitoring points listed in Table 9 of the WUL are sampled on a quarterly basis as required. Borehole DB-BH08 is not being monitored and is described as "Could not be located" in a recent water quality monitoring report.	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Technical Memorandum – Monthly Monitoring Data, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
412	**2**	• The date, time and monitoring point in respect of each sample taken shall be recorded together with the results of the analysis.	• The date and time are recorded for each monitoring locality during each sampling event. This information is presented with the monitoring results in the water quality monitoring reports.	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Technical Memorandum – Monthly Monitoring Data, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
413	**3**	• Monitoring points shall not be changed prior to notification to and written approval by the Provincial Head.	• None of the monitoring points listed in the WUL have been replaced or moved, however borehole DB-BH08 is not being monitored and is described as "Could not be located."	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Technical Memorandum – Monthly Monitoring Data, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
414	**4**	• Water quality tests to be performed on the tailings disposal complex monitoring boreholes on a quarterly basis in order to determine the risks to the receiving environment. The data gathered in the investigation must be reported annually during March of each year to the Regional Head. If any toxicity levels as specified is exceeded, the Licensee must institute an investigation to determine the cause of toxicity.	• There is an extensive network of monitoring boreholes around the Helena and Mareesburg TSFs which are monitored monthly and quarterly. The annual monitoring report containing these monitoring results is submitted to the DWS as required.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Annual Water Monitoring Report Proof of Submission, 24 Jan 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑
415	**5**	• Water quality test must be conducted quarterly on the wastewater stream from the disposal facility when returned back to the mine for use as process water.	• The RWDs at the Mareesburg and Helena TSFs are monitored on a monthly basis.	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
416	**6**	• Analysis shall be carried out in accordance with methods prescribed by and obtainable from the South African Bureau of Standards (SABS), in terms of Standards Act, 1982 (Act 30 of 1982).	• The analysis of water samples is undertaken at a South African National Accreditation system (SANAS) accredited laboratory, Aquatico Scientific (Pty) Ltd (TO685), using methods provided in the SANAS Schedule of Accreditation.	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
417	**7**	• The methods of analysis shall not be changed without prior notification to and written approval by the Minister.	• The methods of analysis have not changed.	• Quarterly Water monitoring reports, GCS, 2024 & 2025 • Technical Memorandum – Monthly Monitoring Data, GCS, 2024 & 2025 • Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
Departmental Standard Conditions					
1. Scope of the Authorisation					
418	**1.1**	• The holder of IEA shall be responsible for ensuring compliance with the conditions contained in the IEA. This includes any person acting on the holder's behalf, including but not limited to an agent, servant, contractor, subcontractor, employee, consultant or any person rendering a service to the holder of the IEA..	• RPM conducts weekly internal (RPM Environmental Officer) and monthly external (SRK Consulting) ECO inspections at Der Brochen, assessing EMPr compliance for Der Brochen. • Independent external consultants are furthermore appointed to conduct annual compliance audits.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024)	
419	**1.2**	• Any changes to, or deviation from the project description set out in this IEA must be approved in writing by this Department before such changes or deviations may be effected. In assessing whether to grant such approval or not, the Department may request such information as is deems necessary to evaluate the significance and impacts of such changes or deviation and it may be necessary for the holder of the IEA to apply for further authorisation in terms of the EIA Regulations.	• An alignment meeting was held with the DMPR in Jun 2025, presented by SRK and RPM: o To discuss the changes to be made regarding the use of the authorised DMS Stockpile area o To align the authorised footprint of the DMS stockpile area with that authorised in the WUL o Discuss regulatory requirements with DMPR. • The discussion included changes in listed activities, the name change of the DMS stockpile to the Mareesburg stockpile, as well as the name change of AAP to Valterra.	• DMPR Alignment Meeting: Rustenburg Platinum Mine Der Brochen Mototolo Complex DMS Stockpile Area (02/06/25) • *It is recommended that when the EMPr is reviewed and the Der Brochen activities authorised in the 2021 EMPr are consolidated with the 2019 Der Brochen EMPr activities into one document, that the maps and description of the Der Brochen Mine only reflect the implemented and future Mine Plan, excludes the infrastructure and activities not required and updates the conditions as per the recommendations in this and the previous compliance audit reports.*	
420	**1.3**	• The activities, which are authorised, may only be carried out at the property (ies) indicated in the IEA and or on the approved EMPr.	• The authorised footprint was pegged prior to construction and the Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed. Site creep is monitored.	• Site audit observations and interviews (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
421	**1.4**	• Where any of the holder of the IEA contact details change including name of the responsible person, physical or postal address/ or telephonic details, the holder of the IEA must notify the Department as soon as the new details become known to the holder of the IEA.	• RPM sent letters to the Regional Manager and Principal Inspector of Mines (Department of Mineral and Petroleum Resources: Limpopo) advising them in writing of the company name change from AAP to Valterra on 8 May 2025. • An EMPr alignment meeting was furthermore held with the DMPR in Jun 2025, presented by SRK and RPM, with the discussion including notification of the name change of AAP to Valterra.	• DMPR Alignment Meeting: Rustenburg Platinum Mine Der Brochen Mototolo Complex DMS Stockpile Area (02/06/25)	☑
422	**1.5**	• The IEA does not negate the responsibility of the holder to comply with any other statutory requirements that may be applicable to the undertaking of such activity (ies).	• The holder of the IEA is aware of this condition and obtained a WUL for the Der Brochen Mine to authorise the required water uses, various permits from DAFF and LEDET to disturb protected plants and trees, as well as permits from SAHRA for the exhumation and re-internment of graves from the Mine footprint.	• PGS Reports (21/10/22 and 15/10/24)	☑
423	**1.6**	• The holder of IEA must ensure that all areas where the authorised activities occur have controlled access to ensure safety of people and animals.	• Site access is restricted to the appointed Mine construction team and contractors.	• Access to Der Brochen is controlled by RPM Protection services, fencing, turnstiles, access cards and pre-booked visitors' access (Photo 4)	☑
2. Appeal of Authorisation					
424	**2.1**	• The holder of IEA must in writing, within 14 (fourteen) calendar days from the date of this decision and in accordance with EIA Regulation 4(2) do the following:	• The 2024 EMPr Compliance audit states that the 2022 EMPr Compliance audit confirmed that the consultant appointed by the Mine notified all registered I&APs of the EA, issued on 26 Nov 2021, by 10 Dec 2021.	• 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	☑
425	**2.2**	• Notify all registered I&APs of - 2.2.1 The outcome of the application; 2.2.2 The date of the decision; 2.2.3 The date of issue of the decision and; 2.2.4 The reasons for the decision as included in Annexure 1 and Departmental Standard Conditions in Annexure 2.			☑
426	**2.3**	• Draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations.			☑
427	**2.4**	• Draw the attention of all registered I&APs to the manner in which they may access the decision.			☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
428	**2.5**	• Provide the registered I&APs with: 2.5.1 Name of the holder (entity) of this IEA: Anglo American Platinum (AAP) Rustenburg Platinum Mines (RPM) (Pty) Ltd (Der Brochen Mine) 2.5.2 Name of the responsible person for this IEA: Dr Gordon Smith 2.5.3 Postal address of the holder: Private Bag X1 Marshalltown Johannesburg 2107 2.5.4 Telephonic and fax details of the holder: Tel: 011 373 6334 Fax (086) 776 3656 2.5.5 E-mail address of the holder if any: Gordon.smith@angloamerican.com	• The 2024 EMPr Compliance audit states that the 2022 EMPr Compliance audit confirmed that the consultant appointed by the Mine notified all registered I&APs of the IEA, issued on 26 Nov 2021, by 10 Dec 2021.	• 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	☑
		3. Commencement of the Activity (ies)			
429	**3.1**	• In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	• Compulsory PPE is checked for the Mine Team and all visitors prior to being granted access on site.	• Site audit (26/06/25)	☑
430	**3.2**	• This IEA must be provided to the site operator and the requirements thereof must be made fully known to him or her.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑
431	**3.3**	• Hauling routes for construction vehicles and machinery must be clearly marked and appropriate signalling must be posted to that effect. Furthermore, movement of construction vehicles and machinery must be restricted to areas outside of the drainage line or wet areas.	• Signage was observed along the roads. • There are currently no speed signs on site due to the Mine being under construction, but speed signs will be erected along the permanent access roads (Mine Lead Engineer interview, 26/06/25) • Construction vehicles are restricted to the main access and haul roads.	• Photo 48: Road signs • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030): o 40 km/hour where sign posted o 20 km/hour in all Mototolo Complex Surface Operational areas o 16 km/h for all underground operations • Site interviews and audit observations (26/06/25)	☑
432	**3.4**	• Appropriate notification sign must be erected at the construction site, warning the public (residents, visitors etc.) about the hazard around the construction site and presence of heavy vehicles and machinery.	• Various signs are displayed at the main entrance and within the construction site, warning against various hazards.	• Access to Der Brochen is controlled by RPM Protection services, fencing, turnstiles, access cards and pre-booked visitors' access (Photo 4) • Photo 49: Hazard warning signs	☑

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
433	**3.5**	• Construction must include design measures that allow surface and subsurface movement of water along the drainage lines so as not to impede natural surface and subsurface water flow, and drainage measures must promote the dissipation of storm water runoff.	• The site has been developed within the approved footprint and the south portal clean stormwater cut-off diversion channel and terrace stormwater drain were constructed upstream of the shaft complex to divert stormwater back to the Groot Dwars River. • Nine culverts also allow for flow within the drainage lines to continue unimpeded.	• Der Brochen FS Water Management Report (14/09/20) • WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • South Shaft General and Site Development South Portal Site Plan Layout (DRA, 24/04/25) • Der Brochen General and Site Development overall infrastructure Site Plan Layout (DRA, 05/03/24)	
434	**3.6**	• Vegetation clearance must be limited areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • Various Agreenco reports provide proof of IAP eradication on the Der Brochen footprint.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Agreenco Service Acceptance Letter (26/05/25) and Progress Reports (12/09/23, 28/06/23 and 26/07/23)	
435	**3.7**	• The holder of IEA must note that in terms of the National Forest Act (Act No.84 of 1998) protected plant species, also listed in Limpopo Environmental Management Act (Act no.7 of 2003) must not be cut, disturbed, damaged, destroyed and their products must not be possessed, collected, removed, transported, exported, donated, purchased or sold unless permission is granted by the Department of Agriculture, Forestry and Fisheries.	• The RPM Environmental Manager and Officer obtained all the required permits for relocation of the SCC, and various permits were provided to the auditor as evidence.	• Department of Agriculture, Forestry and Fisheries (DAFF) Permit to cut, disturb, damage and destroy protected trees (2024-25), lists *Berchemia zeyheri*, *Sclerocarya birrea* and *Elaeondendron transvaalense* • DAFF Permit to cut, disturb, destroy or remove protected trees (2023-24), lists *Berchemia zeyheri, Lydenburgia cassinoides, Sclerocarya birrea* and *Elaeondendron transvaalense* (25/07/23) • Wildlife Trade and Regulation Permit: Pick protected plants on Der Brochen 7 JT: *Elephantorrhiza praetermissa*, LDEDET (12/12/22) • Wildlife and Trade Regulation Permit: Pick and Convey protected plants on Der Brochen 7 JT: *Elephantorrhiza praetermissa, Boscia foetida* and *Scadoxis puniceus* (25/02/22) • DAFF Permit to cut, destroy and/or transplant protected trees, lists *Lydenburgia cassinoides, Sclerocarya birrea* and *Elaeondendron transvaalense* (26/05/21) for the South Shaft Portal	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
436	**3.8**	• Construction areas (e.g. material lay down areas), topsoil and subsoil must be protected from contamination or pollution. Stockpiling must not take place in drainage lines or areas where it will impede surface water runoff.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	☑
437	**3.9**	• If any soil contamination is noted at any phase of the proposed activity (ies), the contaminated soil must be removed to a licensed waste disposal facility and the site must be rehabilitated to the satisfaction of the Department and Department of Water and Sanitation. The opportunity for the onsite remediation and re-use of contaminated soil must be investigated prior to the disposal and this Department must be informed in this regard.	• The Hydrocarbon Management Procedure states that all bund walls will be sealed or lined to prevent seepage and leakage that may result in water and/or soil contamination. • It also states that Hazardous Waste skips/drums are to be available in the workshop area should contaminated soil, hydrocarbon contaminated waste from the workshop require disposal. • It details the actions required for spills on soil/land, including: o contaminated soil to be taken to a bioremediation site (if one exists) or treated in-situ with bioremediation agents o if no bioremediation is to be undertaken, the contaminated soil must be placed into a hazardous waste bin / skip for transportation to a Zero Waste to Landfill (ZW2L) facility.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Photo 50 shows hydrocarbon contaminated soil in a waste skip outside the temporary Der Brochen workshop	☑
438	**3.10**	• An integrated waste management approach must be implemented that is based on waste minimization and must incorporate avoidance, reduction, recycling, treat, reuse and disposal where appropriate. Uncontaminated rubble generated on the premises can be re-used as back filling material on site. Ensure that no refuse or rubble generated on the premises is placed, dumped or deposited on the adjacent properties or public places and open space.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips/boxes) prior to transport to the salvage yards/sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
439	**3.11**	• In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the NWA, 1998 (Act No. 36 of 1998), any costs incurred to remedy environmental damage must be borne by the person responsible for the damage. It is therefore imperative that the holder of the IEA reads through and understand the legislative requirements pertaining to the project. It is the Applicant's responsibility to take reasonable measures which include informing and educating contractors and employees about environmental risks of their work and training them to operate in an environmentally acceptable manner.	• The holder of the IEA is aware of this condition. • The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	
440	**3.12**	• Construction vehicle must be serviced and maintained in the manner whereby no excessive smokes and noise production is reduced to acceptable levels, and to prevent oil leaks. Contaminated soil must be remediated on site or removed to an authorised landfill site.	• Servicing and maintenance of vehicles and equipment is done at the temporary workshop, in line with the OEM schedule and as required. • Contaminated soils are to be taken to a bioremediation site (if one exists) or treated in-situ with bioremediation agents; if no bioremediation is to be undertaken, the contaminated soil must be placed into a hazardous waste bin / skip for transportation to a ZW2L facility.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Photo 18: Temporary workshop • Photo 50: Contaminated soils	
441	**3.14**	• Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	• The closest residential area is 10 km north-west of DB (EMPr, 2019). • Daytime noise measurements at the Der Brochen south shaft construction site boundary measured 52.4 dBA during the Sep 2024 survey (below the SANS 10103:2008 industrial limit of 70 dBA). • This condition is thus not applicable.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019) • Der Brochen Annual Noise Monitoring Report, SLR (07/10/24)	
442	**3.15**	• Dust suppression measures must be implemented on all exposed surface to minimise and control airborne dust.	• Evidence of wet suppression during the site audit.	• Photo 8: Dust suppression	
443	**3.16**	• Mixing of cement, concrete, paints, solvent, sealants, and adhesive must be done in specified areas on concrete aprons or on protected plastic linings to contain spillage or overflow onto soil to avoid contamination of underground water and environmental damage.	• No designated lined or bunded concrete and cement mixing areas were observed on site. • There were however also no concrete or cement spills/residues on bare ground on site.	• Site audit observations (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
444	**3.17**	• Should any heritage remains be exposed during operation or any actions on the site, these must immediately be reported to the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA) (in accordance with the applicable legislation). Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from the South African Heritage Resource Agency (SAHRA) and or Limpopo Heritage Resource Agency (LIHRA). Heritage remains include: archaeological remains (including fossil bones and fossil shells); coins; middens, indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	• The Cultural Heritage Chance Find Procedure describes the framework steps to be followed for any CFs, as follows: o Stop all works in the vicinity of the find. Notify the person in charge. o Delineate and secure the area, take photos and record details. o Preliminary evaluation by qualified specialists. o If finds are significant, notify the relevant authorities. o Await investigation by relevant authorities. o Construction/Operations resume following implementation of investigation's findings and written permission from authorities. • The Cultural Heritage Procedure also defines the various types of heritage remains.	• Mototolo Complex Cultural Heritage Chance Find Procedure (MOTC-ALL-SER-PRO-0004)	
445	**3.18**	• Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.	• The method statement does not specify ensuring that the stockpiles are not contaminated. • The temporary SWMP also only refers to the management of erosion on the stockpiles. • The 2024 external EMPr Compliance Audit states that 'no concerns regarding hydrocarbon pollution of the soil were identified.'	• The below Plans should be updated to reflect inspections: o Method Statement: Topsoil Stockpile Management (WBHO, 14/01/21) o WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25)	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
446	3.19	• Hydraulic fluid or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned up immediately by removing spillage together with the polluted solids and dispose it in the authorised disposal site permitted of such waste. The regional office of the Department of Water and Sanitation must be notified within 24 hours of an incident that may pollute surface and underground water resources.	• The Hydrocarbon Management Procedure describes bund and settlement requirements. • Some compliant areas were observed: o temporary workshop is surfaced o WBHO oils storage in an impermeable container o sump at equipment washing bay o self-bunded diesel storage tank on a hardstand • Various non-compliances were observed at the temporary workshop: o no containment or settlement facilities o washing of hydrocarbon contaminated equipment on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Compliant: o Photos 18 - 21 o Various spill kits were observed on the construction site (26/06/25) o Photo 50 shows hydrocarbon contaminated soil in a waste skip outside the temporary Der Brochen workshop • Non-compliant: o Photos 22 - 27	
447	3.20	• Chemical sanitation facilities or system such as toilets that do not rely on the seepage of liquids must be provided with a ratio of 1 for every 15 workers. These must be placed such that they prevent spills or leaks to the environment and must be maintained according to the operating instructions and the content thereof must be disposed of at an authorised waste water treatment works.	• Male and female ablution facilities are provided throughout the site (26/06/25). • The toilets are managed by an external contractor.	• Photo 29	
448	3.21	• The holder of IEA must ensure that any water uses listed in terms of Section 21 of National Water Act must get authorization from Department of Water and Sanitation prior to the commencement of such activity (ies).	• The required Der Brochen water uses were authorised in Licence No. 06/B41G/ABCGIJ/10965 (30/09/21) and Amendment Licence of 31/10/22.	• Der Brochen Mine 2021 Water Use Licence - 2025 Annual Compliance Audit	
449	3.22	• This IEA does not purport to absolve the holder of IEA from its common law obligations towards the owner of the surface of land affected.	• The holder of IEA is aware of this condition.	• Site audit observations and interviews (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
450	**3.23**	• The holder of IEA must ensure that rehabilitation of the disturbed areas caused by operation at all times comply with the approved EMPr.	• Areas handed over by the construction team have been/are being rehabilitated. • Various areas of completed and active rehabilitation were observed on site. • Indigenous plants are propagated in the nursery prior to being used in rehabilitation.	• Conservation Manager interviews and follow-up emails • Photo 2, 9 and 10 • Agreenco Progress Reports (Jan and Apr 2025) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	☑
451	**3.24**	• This IEA may be amended or withdrawn at any stage for non-compliance and provides no relief from the provisions of any other relevant statutory or contractual obligations.	• The holder of IEA is aware of this condition.	• Site audit observations and interviews (26/06/25)	ⓘ
452	**3.25**	• The holder of IEA must note that in terms Section 43A of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), residue deposit and residue deposit must be deposited and managed in a prescribed manner on any site demarcated for that purpose in the Environmental Management Plan or Environmental Management Programme. No person may temporary or permanently deposits residue stockpile or residue deposit on any area or site other than on site indicated on the Environmental Management Plan or Environmental Management Programme.	• The 2019 EMPr describes the WRD embankment facility of 23.2 ha on Helena 6 JT. • Table 4-1 and Figure 4-2 of the 2019 EMPr depicts the WRD embankment area (*area no. 5 on **Figure 3** of this report*) and lists the Listed Activities triggered by the facility. • The IEA (2021) includes the same Map ID no. 5 and includes coordinates for the WRD embankment.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov, 2019) • Der Brochen Mine Integrated Environmental Authorisation, 2021 • Mapping of the IEA coordinates of the WRD embankment on Google Earth.	☑
453	**3.26**	• The holder of IEA must note that in terms Section 20 of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), no person may commence, undertake or conduct a waste management activity, except in accordance, with the requirements of norms and standards determined in terms of Section 19 (3) for that activity or a waste management licence is issued in respect of that activity if licence is required.	• Evidence of domestic waste separation bins, industrial and hazardous waste skips were observed on site. • Mototolo Complex has a Waste Management Licence (WML) for the Borwa and Lebowa Salvage Yards. • Waste Legends are currently appointed as the licenced waste removal contractor. • Various waste manifests were received as proof of disposal at suitable licenced facilities.	• Photo 7: Domestic and industrial waste receptacles • Photo 40: Hazardous waste skips • Photo 41: Waste manifest for hazardous waste • Photo 42: Waste Manifest for scrap wood • Photo 43: Waste Manifest for used oil	☑
454	**3.27**	• An appeal under Section 43 (7) of the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended) suspend an IEA or exemption or any provisions of conditions attached hereto, or any directive unless the Minister directs otherwise.	• The holder of IEA is aware of this condition.	• Site audit observations and interviews (26/06/25)	ⓘ

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
455	3.28	• Should you be notified by the Minister of a suspension of the authorisation pending appeal procedure, you may not commence with the activity (ies) until such time that the Minister allows you to commence with such activity (ies) in writing.	• The holder of IEA is aware of this condition.	• Site audit observations and interviews (26/06/25)	
456	3.29	• The Department reserves the right to audit and/or inspect the activity (ies) without prior notification at any reasonable time and at such frequency as may be determined by the Regional Manager.	• The holder of IEA is aware of this condition.	• Site audit observations and interviews (26/06/25)	
457	3.30	• The waste storage site must have a firm, impermeable, chemical resistant floors and a roof to prevent direct sunlight and rain water from getting in contact with the waste.	• Evidence of domestic waste separation bins, industrial and hazardous waste skips were observed on site, but there is no designated waste storage site. • Waste is only temporarily stored at the Der Brochen South construction area, from where it is collected, and processed and disposed of off-site.	• Site audit observations and interviews (26/06/25)	
458	3.31	• The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming in contact with the waste and must be diverted away from the storage site.	• The Hydrocarbon Management Procedure describes bund and settlement requirements. • Some compliant areas were observed: o temporary workshop is surfaced o WBHO oils storage in an impermeable container o sump at equipment washing bay o self-bunded diesel storage tank on a hardstand. • Various non-compliances were observed at the temporary workshop: o no containment or settlement facilities o washing of hydrocarbon contaminated equipment on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Compliant: o Photos 18 - 21 • Non-compliant: o Photos 22 - 27	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
459	**3.32**	• Subject to the commencement and duration requirements of the MPRDA and NEMA for the listed mining activity is valid for the period for which the aforesaid right is granted provided that the activity must commence within 10 years. If the commencement of the proposed activity does not occur within the specified period, the IEA lapses and a new application for IEA in terms of the NEMA and the IEA Regulations should be made for the activity to be undertaken.	• According to the Nov 2024 SRK ECO Report, construction activities commenced in Apr 2022, thus within the 10 year period.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024)	
460	**3.33**	• The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes as set out in EMP or EMPr.	• Pre-construction, construction and some operational activities were/are being undertaken in phases, as detailed in the EMPr.	• Site audit observations (26/06/25) and EMPr review	
461	**3.34**	• This IEA will only be effective on the event that a corresponding right is issued in terms of MPRDA as amended and none of the activities listed in this IEA may commence without right.	• A new order mining right was issued to AAP on 16 Apr 2003: Mining Right Reference Number: LP30/5/1/2/2/182 MR.	• 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	
462	**3.35**	• The listed activity (ies), including site preparation, must not commence within 20 (twenty) calendar days of the date of the notification of the decision being sent to the registered I&APs. In the event that an appeal is lodged with the appeal administrator, the effect of this environmental authorisation is suspended until such time as the appeal is decided.	• According to the Nov 2024 SRK ECO Report, construction activities commenced in Apr 2022. • The 2024 EMPr Compliance audit states that the 2022 EMPr Compliance audit confirmed that the consultant appointed by the Mine notified all registered I&APs of the EA, issued on 26 Nov 2021, by 10 Dec 2021.	• Der Brochen South Shaft Construction Phase - Monthly ECO Site Inspection Report, SRK (Nov, 2024) • 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024)	
463	**3.36**	• Should there be any conflicting conditions between this IEA and other approval granted by other authorities, it is upon the holder of IEA to bring it to the attention of the Department for resolution.	• The holder of IEA is aware of this condition and has not raised any conflicting conditions.	• Site interviews (26/06/25)	
4. Management of Activity (ies)					
464	**4.1**	• A copy of the IEA and EMPr must be kept at the property or on site office where the activity (ies) will be undertaken. The IEA and EMPr must be produced to any authorised officials of the Department who request to see it and must be made available for inspection by any employee or agent of the holder of the IEA who works or undertakes work at the property (ies).	• The Environmental Officer confirmed that electronic copies of the environmental authorisations are shared with the contractors and kept on the RPM database.	• Environmental Officer interview (26/06/25)	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
465	**4.2**	• The content of the EMPr and its objectives must be made known to all contractors, subcontractors, agent and any other people working on the site, and any updates or amendments to the EMPr must be submitted to the Department for approval.	• The EMPr and WUL authorisations and conditions were/are shared with all the Der Brochen Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑
466	**4.3**	• Regular monitoring and maintenance of storm water drainage facilities must be conducted at all times, if damaged as directed by the Department or any other relevant authority.	• The Temporary SWMP states that: o the silt traps will be monitored on a weekly basis and after rain events o siltation of the silt trap will be maintained by periodically cleaning it out o sediment that is collected in the trap will be used on the construction or maintaining the berms on site. o siltation, undercutting of the excavated trenches and stability of road crossings over pipes will be monitored and maintained.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Evidence viewed of maintenance of stormwater management infrastructure on site during the audit (26/06/25)	☑
467	**4.4**	• A buffer zone of 100 metres between the activity (ies) and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.	• The Environmental Officer assisted the Conservation Manager in the site-pegging pre-construction and monitors site creep. • The Conservation Manager advised that all Cultural Heritage observations with assigned cultural significance of medium or higher are demarcated on the online GIS platform. Observations that are recorded as burial grounds and graves have a 100 m stand-off area zone, and others a 50 m stand-off area. • The closest residential area is 10 km north-west of DB (EMPr, 2019).	• Photo 1: Site demarcation peg • Environmental Officer and Conservation Manager interviews (26/06/25)	☑
468	**4.5**	• The holder of the IEA must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards.	• The Mine applies dust suppression on exposed surfaces as required. • The Mine conducts noise measurements at the Der Brochen south shaft construction site boundary to ensure compliance with legal limits. • GCS Water and Environmental (Pty) Ltd (GCS) conducts quarterly monitoring at Der Brochen, including: groundwater levels and quality, drinking water quality, surface water flow and quality. • Proof of Platinum Health HIV/AIDS pamphlets and talk topics were provided to the auditor, which include contact numbers of councillors and Mental Health Services.	• Photo 8 • Der Brochen Annual Noise Monitoring Report, 2024 • 2024-2025 Water Monitoring Reports (GSC) • Platinum Health pamphlet: Adjusting to Life with HIV • Platinum Health pamphlet: How to navigate your relationship	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
469	**4.6**	• The holder of the IEA must ensure that all non-recyclable waste are disposed of at waste management facilities licenced to handle such wastes and all recyclable waste are collected by licenced waste management facilities for recycling, reuse or treatment.	• All waste at the Complex, including Der Brochen, is sorted into the correct receptables (wheelie bins, skips, boxes) prior to transport to the salvage yards/sorting areas, from where it is removed off-site to recycling facilities or registered landfills.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 7 depicts the various domestic and industrial waste receptacles observed on site	
470	**4.7**	• The holder of the IEA must ensure that all liquid wastes, whose emissions to water or land could cause pollution are diverted to sewer, after testing water quality and receiving written approval from the relevant local authority.	• There are currently no sewers at the Der Brochen construction site. • Chemical toilets are provided site-wide and are managed by an external contractor.	• Site audit observations and interviews (26/06/25)	
471	**4.8**	• Non-compliance with any condition of this IEA or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of s section 31 of NEMA.	• The holder of IEA is aware of this condition and has not raised any conflicting conditions.	• Site interviews (26/06/25)	
472	**4.9**	• This IEA only authorises activities specified in the EMPr /closure plan and a new authorisation must be applied for in respect of any new activity not specified as part of the EMPr.	• The holder of IEA is aware of this condition and has not raised any conflicting conditions.	• Site interviews (26/06/25)	
473	**4.10**	• Only listed activities that are expressly specified in the EMPr that forms part of this IEA may be conducted, and additional or new activities not specified herein must be applied for by the holder and authorised by the competent authority in the form of an amendment to the aforesaid EMPr before such activities may be commenced with. This condition is also applicable in the case of the amendment, addition, substitution, correction, removal or updating of any detail in the aforesaid EMPr.	• The Listed activities implemented on site are included in this EMPr and IEA, as well as authorised under the 2021 Der Brochen-Mototolo Mine Complex Amended EMPr and associated 2022 IEA. • An alignment meeting was held with the DMPR in Jun 2025, presented by SRK and RPM: o To discuss the changes to be made regarding the use of the authorised DMS Stockpile area o To align the authorised footprint of the DMS stockpile area with that authorised in the WUL o Discuss regulatory requirements with DMPR. • The discussion included changes in listed activities, the name change of the DMS stockpile to the Mareesburg stockpile, as well as the name change of AAP to Valterra.	• Document review and interviews with environmental personnel	
474	**4.11**	• Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPr.	• Areas handed over by the construction team have been/are being rehabilitated. • Various areas of completed and active rehabilitation were observed on site. • Indigenous plants are propagated in the nursery prior to being used in rehabilitation.	• Conservation Manager interviews and follow-up emails • Photo 2, 9 and 10 • Agreenco Progress Reports (Jan and Apr 2025) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
475	**4.12**	• The Holder of IEA must ensure that the name and contact details of the ECO is made available to the Regional Manager within 30 days of commencement. The holder of IEA must also ensure that an ECO is always available on site to ensure that activity (ies) at all times comply with the issued IEA and approved EMPr.	• The 2024 EMPr Compliance Audit states that: *'It could not be verified if the name and contact details of the ECO were made available to the Regional Manager within 30 days of commencement. Proof of notification in terms of the change in management and again providing the details of the ECO were submitted to the DMPR on 3 Jan 2023.'*	• 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024): *Letter to the DMPR, with date stamp of 3 Jan 2023*	☑
476	**4.13**	• The ECO must: 4.13.1 Keep and maintain a detailed incidents register (including any spillages of fuels, chemicals or any other material. 4.13.2 Keep a complaint register on site indicating the complaint and how the issues were addressed, what measures were taken and what the preventative measures were implemented to avoid re-occurrence of complaints. 4.13.3 Keep records relating to monitoring and auditing on site and avail them for inspection to any relevant authorised officials. 4.13.4 Keep copies of all environmental reports submitted to the Department. 4.13.5 Keep the records of all permits, licences and authorisations required by the operation. 4.13.6 Compile a monthly monitoring report and make it available to the Department if requested.	• Mototolo Complex maintains an electronic Environmental Incident Register, which includes Der Brochen. • A grievance register is kept for the Mototolo Complex, including Der Brochen. • All environmental records are maintained in an online database, including: o quarterly and annual groundwater and surface water monitoring reports (GCS) o monthly and annual air quality monitoring reports (GCS) o weekly internal environmental inspection reports (RPM Environmental Officer) and monthly external ECO Site Inspection Report (SRK) o annual external EMPr compliance audit reports o all environmental authorisations, licences, permits and correspondence with the Department.	• Mototolo Complex Environmental Incident Register - 2025 • 2025 Mototolo Complex Grievance Register • Review of various environmental monitoring reports supplied as evidence for the current audit period.	☑
477	**4.14**	• The duties and responsibility of the ECO should not be seen as exempting the holder of the IEA from the legal obligations in terms of the NEMWA and NEMA.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	ⓘ
478	**4.15**	• The footprint of the activity (ies) must be limited on the areas authorised for the actual construction works and operational activities and all areas outside of the footprint must be regarded as a "no go" areas.	• The Environmental Officer assisted the Conservation Manager in the site-pegging pre-construction and monitors site creep. • The Conservation Manager and Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Photo 1: Site demarcation peg	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
479	**4.16**	• Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water run-off. Where necessary erosion stabilizing action such as gabions or re-vegetation must be implemented to prevent further habitat deterioration.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable. • Viewed during the site audit (26/06/25): culverts along the services corridor, gabions to prevent erosion, the south portal stormwater diversion channel and terrace stormwater drain. • Various areas of completed and active rehabilitation were observed on site.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/25) • Photos 11-14 show proof of implementation of the SWMP measures • Photo 2, 9 and 10 • Agreenco Progress Reports (Jan and Apr 2025)	☑
480	**4.17**	• The holder of the IEA must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimise the risk involved. Records of training and verification of competence must be kept by the holder IEA.	• Mototolo Complex has appointed a Hazardous Materials Coordinator, responsible for the purchase, storage, issue, accounting for any substance used at Mototolo Complex which (if not properly supervised) could result in death/injury/ illness to any employee, contractor or the public, or in product contamination.	• Mototolo Complex letter SHE/2025/312 (10/04/25)	☑
481	**4.18**	• In order to prevent nuisance conditions, the holder of the IEA must ensure that all storage skips and bins are not overfilled.	• Evidence of domestic waste separation bins, industrial and hazardous waste skips were observed on site. • Waste is only temporarily stored at the construction area and regularly removed by the contractors to the Mototolo Complex's Borwa salvage yard for storage, processing and disposal.	• Photo 7: Domestic and industrial waste receptacles • Photo 40: Hazardous waste skips	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
			5. Reporting to the Department		
482	**5.1**	• The holder of the EA must: 5.1.1 submit an Environmental Audit Report to this Department biennially and such report must be done by qualified Environmental Assessment Practitioner and must the audit report must specify whether conditions of this environmental authorisation and EMPr/closure plan are adhered to; 5.1.2 identify and assess any new impacts and risks as a result of undertaking the activity/ies, if applicable; 5.1.3 identify shortcomings in the EMPr/closure plan, if applicable; 5.1.4 identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMPr/closure plan; 5.1.5 if applicable, specify that the corrective action/s taken for the previous audit's non-conformities, was adequate; 5.1.6 specify the name of the auditor and 5.1.7 be submitted by the holder to the competent authority within 30 days from the date on which the auditor finalised the audit.	• The holder of the IEA appoints independent external auditors to conduct the annual EMPr Compliance Audits, as per Regulation 34 and Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). • The Final 2024 EMPr Compliance Audit is dated Nov 2024 (EnviroGistics), and was submitted to the DMPR on 04/12/24.	• 2024 EMPr Compliance Audit (EnviroGistics, Nov 2024) • Mototolo Complex letter of submission of the audit report to the Regional Head: DMPR Polokwane, dated (SHE/DBS/2024/298), dated 25/11/2024 (DMPR received date stamped 01/12/24)	
483	**5.2**	• Should any shortcomings in terms of Regulation 34(4) be identified, the holder must submit recommendation to amend the EMPr/closure plan in order to rectify any shortcomings identified with the aforementioned audit report.	• Various recommendations have been included in this audit report and referenced from the previous EMPr compliance audits.	• *It is recommended that when the EMPr is reviewed and the Der Brochen activities authorised in the 2021 EMPr are consolidated with the 2019 EMPr activities into one document, that the maps and description of the Der Brochen Mine only reflect the implemented and future Mine Plan, excludes the infrastructure and activities not required and updates the conditions as per the recommendations in this and the previous compliance audit reports.*	
484	**5.3**	• Any complaint received from the I&AP during all phases of the operation must be attended to as soon as possible and addressed to the satisfaction of all concerned interested and affected parties.	• A grievance register is kept for the Mototolo Complex, including Der Brochen. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates and a statement whether the stakeholder is satisfied with the resolution.	• 2025 Mototolo Complex Grievance Register	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
485	5.4	• The holder of the IEA must annually assess the environmental liabilities of the operation by using the master rates in line with the applicable Consumer Price Index (CPI) at the time and address the shortfall on the financial provision submitted in terms of section 24P of NEMA.	• Mototolo Complex assesses their Closure Liability on an annual basis. • Evidence of the submission of the proposed contributions 2024 to the DMPR was received.	• AAP Letter dated Dec 2024: Mototolo Environmental Rehabilitation Trust: Proposed contributions for the year ending Dec 2024 - Mototolo Complex LP/5/1/2/3/2/1 (0182) EM (DMPR Date Stamped 03/04/2025) • HSBS Bank plc Letter dated 17 Mar 2025: Performance Guarantee Reference: PEBJOH250194 (DMPR Date Stamped 03/04/2025)	
486	5.5	• The holder of the IEA must, within 24 hours of incidents occurring, notify the Competent Authority of the occurrence or detection of any incident on the site, or incidental to the operation of the site, which has the potential to cause, or has caused pollution of the environment, health risks, nuisance conditions or water pollution.	• The incident register shows that the only incident logged for Der Brochen during the audit period was on 07/02/2025: o DWS were notified of a controlled release of stormwater at Der Brochen on 0702/25 due to lack of available storage capacity at the various dams at the Der Brochen site, resulting from excessive rainfall and groundwater recharge - the controlled discharge was necessary to avoid a dam break and uncontrolled release of water.	• Mototolo Complex Environmental Incident Register - 2025 • Mototolo Complex letter to DWS: Provincial Head: Mpumalanga (07/02/2025)	
487	5.6	• The holder of the IEA must, within 14 days, or a shorter period of time, if specified by the Competent Authority from the occurrence or detection of any incident referred to in condition 5.5, submit an action plan, which must include a detailed time schedule, and resource allocation signed off by top management, to the satisfaction of the Competent Authority of measures taken to- 5.6.1 Correct the impact resulting from the incident; 5.6.2 Prevent the incident from causing any further impact; and 5.6.3 Prevent a recurrence of a similar incident.	• The letter to DWS included the following action plan with timelines: o Complete construction of South Shaft (SS-PCD) with benefits of formalised spillways and pumping infrastructure will ensure that water can easily be moved between dams when required. The risk of failure of this dam will be greatly reduced. Additional Storage of 0.5 ML, due by Q3 2025 o Complete construction of Mareesburg Pond 3 with benefits of additional storage at Mareesburg TSF of 113 ML, by Q2 2025 o Drawing down of dams sitewide from Q2 - Q3 with the benefit of additional storage capacity sitewide and lower use of fresh water from the BWUA, due by Q2 -Q3 2025.	• Mototolo Complex letter to DWS: Provincial Head: Mpumalanga (07/02/25)	
488	5.7	• In the event that measures have not been implemented within 21 days of the incident referred to in condition 5.6, or measures which have been implemented are inadequate, the Competent Authority may implement the necessary measures at the cost of the holder of the IEA.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
			6. Site Security and Access Control		
489	**6.1**	• The holder of the IEA must ensure effective access control on the site to reasonably prevent unauthorised entry. Signs indicating the risks involved in unauthorised entry must be displayed at each entrance.	• Site access is restricted to the appointed Mine construction team and contractors. • Various signs are displayed at the main entrance.	• Access to Der Brochen is controlled by RPM Protection services, fencing, turnstiles, access cards and pre-booked visitors' access (Photo 4)	
490	**6.2**	• Weather proof, durable and legible notices in at least three official languages applicable in the area must be displayed at each entrance to the Site. These notices must prohibit unauthorised entry and state the hours of operation, the name, address and telephone number of the holder of the IEA and the person responsible for the operation of the site.	• The signs at the construction site are weather proof, durable and legible, but are only in English. • They display the names of the responsible persons on site, but no contact information.	• The permanent RPM signs for the Der Brochen Mine should display all the required information in the required three official languages of the local area.	
			7. Emergency Preparedness Plan		
491	**7.1**	• The holder of the IEA must maintain and implement an emergency preparedness plan and review it biennially when conducting audit and after each emergency and or major accident. The plan must, amongst others, include: 7.1.1 Site Fire 7.1.2 Spillage 7.1.3 Natural disasters such as floods 7.1 4 Industrial action 7.1.5 Contact details of police, ambulances and any emergency centre closer to the site.	• The Mototolo Complex has an Emergency Response Management Plan to deal with possible disaster events and situations and provides measures on how to manage, prevent and respond. • The Mototolo Complex External Emergency Management Plan address various emergencies and the affected/vulnerable communities.	• Mototolo Complex Emergency Response Management Plan, Valterra Platinum (MOTC-SHE-EME-MAN-0001) • Mototolo Complex Safety and Health: External Emergency Management Plan (MOTC-SHE-EME-PLAN-0001)	
492	**7.2**	• The holder of IEA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.	• No evidence of an emergency register was provided to the auditor for review.	• None.	
			8. Investigations		
493	**8.1**	• If, in the opinion of the Competent Authority, nuisances or health risks may be or is occurring on the site, the holder of the IEA must initiate an investigation into the cause of the problem or suspected problem.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
494	**8.2**	• If, in the opinion of the Competent Authority, pollution may be or is occurring, the holder of the IEA must initiate an investigation into the cause of the problem or suspected problem. Such investigation must include the monitoring of the water quality variables, at those monitoring points and such frequency as may be specified by the Competent Authority.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	
495	**8.3**	• Investigations carried out in terms of conditions 8.1 and 8.2 above must include the monitoring of the relevant environmental pollution, nuisance and health risk variables, at those monitoring points and such frequency to be determined in consultation with the Competent Authority.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	
496	**8.4**	• Should the investigation carried out as per conditions 8.1 and 8.2 above reveal any unacceptable levels of pollution, the holder of the IEA must submit mitigation measures to the satisfaction of the Competent Authority.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	
9. Commissioning and Decommissioning					
497	**9.1**	• The commissioning and decommissioning of individual activity within the overall listed mining activity must take place within the phases and timeframes a set out in EMP or EMPr.	• Pre-construction, construction and some operational activities were/are being undertaken in phases, as detailed in the EMPr.	• Site audit observations (26/06/25) and EMPr review	
10. Site Closure					
498	**10.1**	• The holder of IEA must apply for a closure certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended within 180 days of occurrence of lapsing, abandonment, cancellation, cessation, relinquishment and completion of development.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	
499	**10.2**	• The application for closure indicated above must be submitted together with all relevant documents as indicated in Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002), as amended.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
500	**10.3**	• No exotic plants may be used for rehabilitation purposes only indigenous plant can be utilised for rehabilitation purposes.	• Indigenous plants are propagated in the nursery prior to being used in rehabilitation. • Areas handed over by the construction team have been/are being rehabilitated. • Various areas of completed and active rehabilitation were observed on site. • Indigenous plants are propagated in the nursery prior to being used in rehabilitation.	• Conservation Manager interviews and follow-up emails • Photo 2, 9 and 10 • Agreenco Progress Reports (Jan and Apr 2025) • Der Brochen Rehabilitation Strategy and Implementation Plan Update 2024 (EnviroGistics, Apr 2025)	
501	**10.4**	• The holder of IEA remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of extraneous water, compliance with the conditions of IEA and the management and sustainable closure thereof until the Minister has issued a Closure Certificate in terms of Section 43 of Mineral and Petroleum Resources Development Act (Act 28 of 2002). Where necessary the Minister may retain certain portion of financial provision for residual, health or environmental impacts that might be known in future.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
			11. NEMA Principles		
502	**11.**	• The NEMA Principles (set out in Section 2 of NEMA, which apply to the actions of all Organs of State, serve as guidelines by reference to which any Organ of State must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment), *inter alia*, provides for: o the effects of decisions on all aspects of the environment to be taken into account; o the consideration, assessment and evaluation of the social, economic and environmental impacts of activities (disadvantages and benefits), and for decisions to be appropriate in the light of such consideration and assessment; o the co-ordination and harmonisation of policies, legislation and actions relating to the environment; o the resolving of actual or potential conflicts of interest between Organs of State through conflict resolution procedures; and o the selection of the best practicable environmental option.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	
			12. Disclaimer		
503	**12.**	• The Department of Mineral Resources in terms of the conditions of this environmental authorisation shall not be responsible for any damages or losses suffered by the holder, developer or his/her successor in any instance where construction or operation subsequent to construction is temporarily or permanently stopped for reasons of non-compliance with the conditions as set out herein or any other subsequent document or legal action emanating from this decision.	• The holder of IEA is aware of this condition.	• Site interviews (26/06/25)	

6. AUDIT RESULTS AND WAY FORWARD

6.1 AUDIT RESULTS ANALYSIS

The audit results are summarised in ***Table 6*** and depicted graphically in ***Figure 5***. ***Figure 6*** presents the comparison of the 2024 audit results to the 2025 results for Der Brochen.

Table 6: Audit Results Summary

2025 RATING		NO. OF CONDITIONS			% OF TOTAL CONDITIONS
		2019 EMPR	2021 IEA	TOTAL	
	Noted	60	41	101	**20%**
N/A	**N/A**	8	3	11	**2%**
	Compliant	294	73	367	**73%**
	Non-Compliant	20	4	24	**5%**
TOTAL CONDITIONS		**382**	**121**	**503**	**100%**

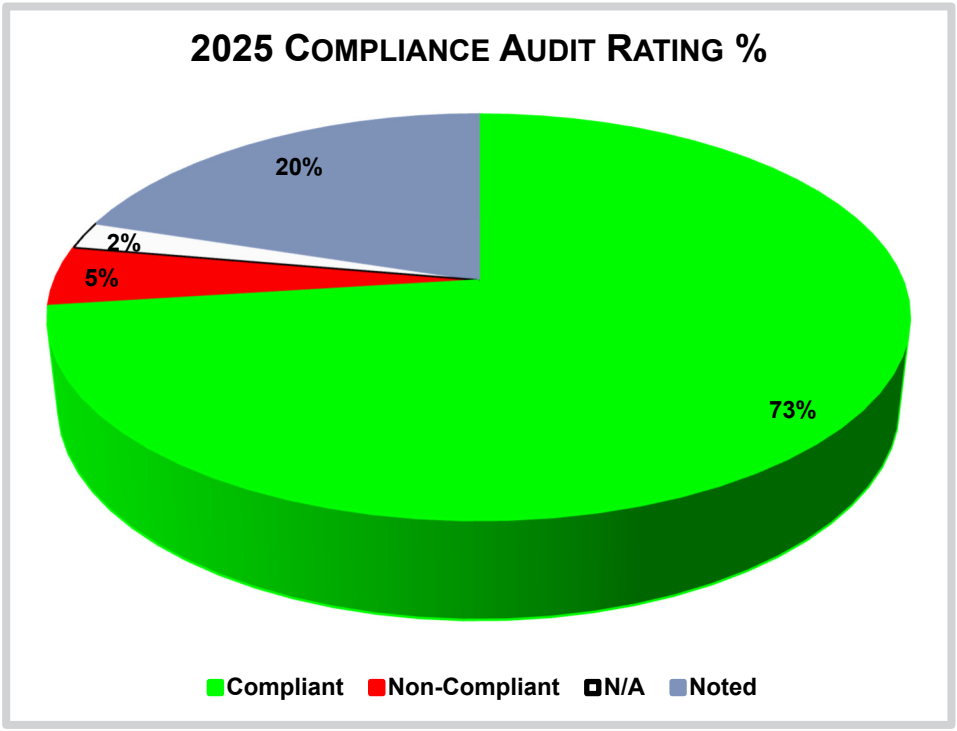


Figure 5: Results of the 2025 EMPr Compliance Audit

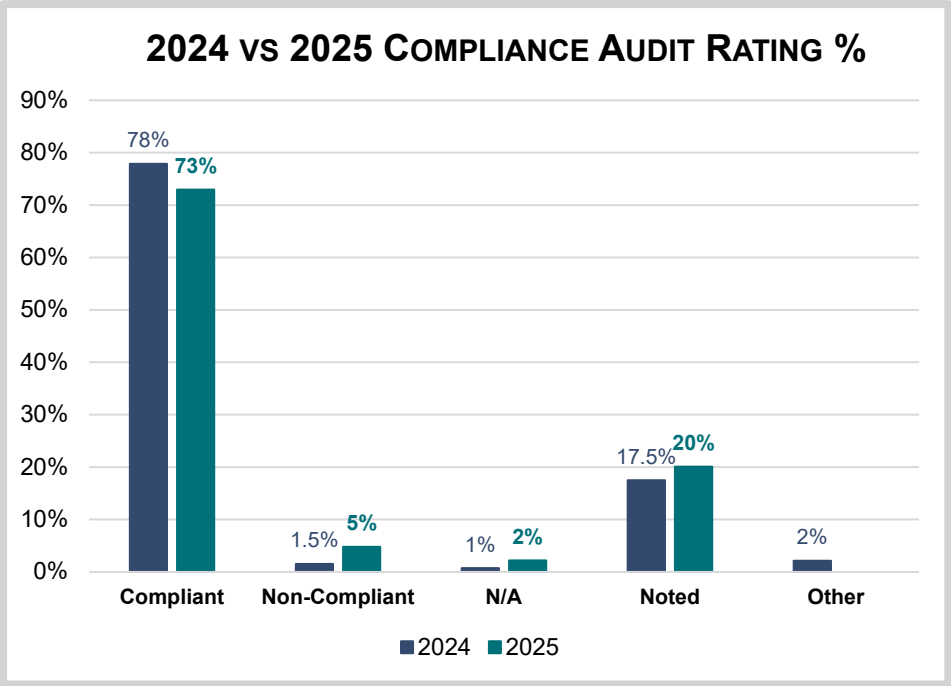


Figure 6: Comparison of the 2024 vs 2025 Audit Results

The Der Brochen Mine achieved an overall full compliance level of 73%, measured against the 503 conditions of the 2019 EMPr and associated 2021 IEA. 5% of the conditions were non-compliant, 2% not applicable and the remaining 20% noted.

There was an increase of 18% in the number of conditions in the EMPr audited in 2025 vs 2024 (503 vs 425). This resulted in a decrease in the overall compliance level from 78% to 73% (*though there were 36 more compliant conditions*), with an increase in the non-compliant (1.5%-5%), not-applicable (1%-2%) and noted (17.5%-20%) conditions between the two years.

Table 7 summarises the 2025 audit's non-compliances, including recommendations.

Table 7: Der Brochen 2025 EMPr Compliance Audit Non-Compliances

#	CONDITION	NON-COMPLIANCE	RECOMMENDATION
2019 EMPr Non-Compliant Conditions			
Flora			
29	A biodiversity offset strategy must be developed.	• The 2023 Der Brochen BAP does not refer to an offset strategy. • No offset strategy has been developed.	• A biodiversity offset strategy must be developed.
198	Access roads will be planned and constructed in such a way as to avoid habitat fragmentation.	• The services corridor (road, conveyor and powerline) will cause habitat fragmentation, as there are no crossing points for fauna.	• Develop management measures to address habitat fragmentation.
Freshwater Aquatics			
218	All wet and dry material should be stored within the construction camp, and these materials should be covered and contained to prevent contact with rainfall or runoff.	• The Der Brochen South Shaft ROM developmental ore is being hauled from underground to the transfer point using underground vehicles, temporarily stockpiled and transferred to surface haul trucks, for transport to the Mototolo Concentrator. • The transfer point is located within the disturbed Der Brochen Mine footprint (not the construction camp), but is not covered nor contained and thus in contact with rainfall and runoff.	• *This commitment should be updated in the EMPr to include the temporary stockpiling of ore during shaft development, during which the ore cannot be covered as it is only temporarily stockpiled prior to being transferred from the underground vehicles to the surface haul trucks.* • The transfer point should however be upgraded so the ore is stored on an impermeable surface and contained from runoff.
220	This zone of regulation must be demarcated clearly by the Environmental Officer prior to the commencement of construction activities.	• The construction drawings only include the 1:100 year floodline, but not the 32 m zone of regulation.	• *This commitment should be updated in the EMPr to specify demarcation on the construction drawings and signposted on site, as demarcation of sensitive habitats through fencing, would cause additional disturbance in a Critical Biodiversity Area, endangered ecosystem, the Sekhukhuneland Centre of Endemism and potential floral endemics and TOPS. .*
Noise			
253	Environmental noise monitoring must be undertaken on a quarterly basis.	• Noise monitoring was undertaken at the Der Brochen South Shaft construction site boundary in Sep 2024. • No evidence of quarterly noise monitoring was supplied.	• Develop a noise monitoring schedule and increasing the frequency of the monitoring to quarterly.

#	CONDITION	NON-COMPLIANCE	RECOMMENDATION
		Soils, Land Use and Land Capability	
54	Stockpile may not exceed three (3) meters in height and will be treated with temporary soil stabilization and erosion control measures.	• Due to limited space, the topsoil stockpiles do exceed 3 m. • The Nov 2024 SRK ECO Report states that: o *'…the height of the topsoil stockpiles can be increased with immediate effect as long as no vehicles/trucks movement is allowed on previous dumped soil.* o *The stockpile should be treated with temporary soil stabilisation methods such as the application of organic matter to promote soil aggregate formation, leading to increased infiltration rate, thereby reducing soil erosion.* o *During the next external audit process, the mine will need to highlight this change to the auditor. This change will need to be captured in the Audit Report which is submitted to the DMPR for approval.'*	• The auditor was not made aware of this change during the audit, and no evidence has been supplied to confirm whether the stockpiles were stabilised and/or if the higher stockpiles are being achieved without additional impacts and without vehicles driving over existing stockpiles. • Clarification is required regarding management of the stockpiles and reporting on any changes in this condition to the DMPR.
150	Prevent mixing of high-quality topsoil (A and B-horizons) with low quality underlying material to ensure sufficient volumes of high-quality soil for rehabilitation.	• Site interviews confirmed that the topsoil and subsoil were mixed on the stockpiles.	• The Method Statement states that 200 mm of topsoil should be stripped and kept separate from waste rock, trees and vegetation, but not from the underlying subsoil. • This cannot be corrected for the soil that has already been stripped and stockpiled. • Future soil stripping needs to be in line with the Method Statement: Topsoil Stockpile Management (WBHO, 14/01/2021)
151	Separate stockpiling of different soil type groups (to obtain the highest post-mining land capability.	• Site interviews confirmed that soil type groups are not stockpiled separately.	• The Method Statement does not state that different soil type groups, nor topsoil and subsoil require separate stockpiling. • An Operational Topsoil Stockpile Management Procedure/Plan is recommended to address the stripping and stockpiling of soil, the management of the stockpiles, as well as the procedure to reapply the soils during rehabilitation.
152	Separate stripping, stockpiling and replacing of soil horizons (A and B horizon) in the original natural sequence to combat hard setting and compaction, and maintain soil fertility.	• It was confirmed on site that the topsoil and subsoil were mixed on the stockpiles.	
		Surface Water	
67	Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.	• Various non-compliances were observed: o no containment or settlement facilities at the temporary workshop o washing of hydrocarbon contaminated equipment at the temporary workshop on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• These non-compliances need to be corrected through improved housekeeping and updated designs in line with legislative and regulatory requirements. • All hazardous materials need to be managed in line with the Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002), as well as the relevant legislation.

#	CONDITION	NON-COMPLIANCE	RECOMMENDATION
236 **246** **248**	Stormwater measures should be appropriately designed to allow for free flow of water.	• The WBHO Temporary SWMP and Project FS Water Report both do not refer to designs allowing for free flow of water. • No permanent SWMP has been developed for the Der Brochen Mine.	• An Operational Der Brochen Mine Stormwater Management Plan (SWMP) needs to be developed and should address: o design of the permanent stormwater management measures to be in line with the closure objectives in the 2024 RSIP stating: *"Runoff contained only in designed and approved structures, otherwise free draining system back to natural system."*
238	Clean water diversions should be constructed prior to clearing areas for new infrastructure.	• The clean water diversion around the upper level of the South Shaft terrace was constructed in parallel with the site clearing activities down gradient.	• The condition cannot be corrected. • Any future clean water diversions should be constructed prior to clearing of any new areas.
239	Hazardous substances and potentially polluting materials should be stored in appropriately bunded areas located outside of the riparian zone. Bunds should be designed for a capacity of 110% of the stored material.	• Various non-compliances were observed: o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o equipment parked with either no drip trays or inadequately sized drip trays o hazardous waste skips stored on bare ground.	• These non-compliances need to be corrected through improved housekeeping and updated designs in line with legislative and regulatory requirements. • All hazardous materials need to be managed in line with the Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002), as well as the relevant legislation.
All Aspects			
371	Adequate erosion protection will be provided at the clean canal discharge locations.	• Significant erosion was observed at the south portal clean stormwater cut-off diversion channel's southern discharge point during the audit. • SRK's review of the stormwater management system as designed by Der Brochen states: o the clean water channel on site is being constructed with energy dissipaters every 5 m o the velocity and peak flow calculations indicate erosion potential at the point where the canal discharges to the environment o SRK recommends that an energy dissipater below the discharge point should be constructed for both the south and north channel discharge areas.	• Finalise the designs, currently underway (as stated by the Mine Engineer) to address these additional energy dissipaters, and comply with the SRK recommendations in [374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK (11/06/25)] • Include the designs in the Operational Mine Stormwater Management Plan.
372	Bunded containment and settlement facilities will be provided for hazardous materials, such as fuel and oil.	• Various non-compliances were observed: o no containment or settlement facilities at the temporary workshop o washing of hydrocarbon contaminated equipment at the temporary workshop on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• These non-compliances need to be corrected through improved housekeeping and updated designs in line with legislative and regulatory requirements. • All hazardous materials need to be managed in line with the Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002), as well as the relevant legislation.
373	Bund sizing will be done at 110% of the largest tank volume minus the volume occupied by any adjacent tanks in the same bund in accordance with SANS 10089-1, with an allowance of an additional 300 mm used for ballast stones placed in the tank bunds.		

#	CONDITION	NON-COMPLIANCE	RECOMMENDATION
375	Drip trays must be located beneath any parked and leaking equipment along with lubricant/fuel absorbing media (moss type products, sawdust) within the drip trays to contain spilled material.	• Equipment parked with either no drip trays or inadequately sized drip trays were observed during the audit.	• Place drip trays under the wacker and bowser parked when parked at the WBHO top construction site. • Place adequately sized drip trays beneath the parked equipment at the temporary workshop area. • Ensure all equipment and vehicles parked on bare ground, have adequately sized drip trays placed beneath the fuel tanks.
380	An inspection and maintenance plan will be implemented on the storm water system to ensure that all oil skimming and sediment handling facilities are maintained, and that storm water canals and pipelines remain unblocked and free flowing – monthly inspections will be carried out.	• No permanent stormwater management plan, nor an inspection and maintenance plan for the stormwater system has been developed to date.	• Develop an Operational Der Brochen Mine SWMP. • Develop a Mine Inspection and Maintenance Procedure/ Plan (*or provide a similar Procedure/Plan, if one exists*).
	2021 IEA Non-Compliant Conditions		
446	Hydraulic fluid or chemicals required during construction must be stored in a concrete lined surface with bund walls and shall be designed in such a manner that any spillage can be contained and reclaimed without any impact on the surrounding environment. Should any spills occur it should be cleaned up immediately by removing spillage together with the polluted solids and dispose it in the authorised disposal site permitted of such waste. The regional office of the Department of Water and Sanitation must be notified within 24 hours of an incident that may pollute surface and underground water resources.	• Various non-compliances were observed: o no containment or settlement facilities at the temporary workshop o washing of hydrocarbon contaminated equipment at the temporary workshop on bare ground o bunds having been inadequately sized to contain 110% of stored hazardous chemical agents o oil containers outside of the bunded area o hydrocarbon spills observed on bare ground o equipment parked with either no drip trays or inadequately sized drip trays o non-containment of dirty water runoff.	• These non-compliances need to be corrected through improved housekeeping and updated designs in line with legislative and regulatory requirements. • All hazardous materials need to be managed in line with the Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002), as well as the relevant legislation.
458	The storage of hydrocarbons must have bund walls with adequate capacity to contain the maximum volume that is stored in the area. Uncontaminated storm water must be prevented from coming in contact with the waste and must be diverted away from the storage site.		
490	Weather proof, durable and legible notices in at least three official languages applicable in the area must be displayed at each entrance to the Site. These notices must prohibit unauthorised entry and state the hours of operation, the name, address and telephone number of the holder of the IEA and the person responsible for the operation of the site.	• The signs at the construction site are weather proof, durable and legible, but are only in English. • They display the names of the responsible persons on site, but no contact information.	• The permanent RPM signs for the Der Brochen Mine should display all the required information in the required three official languages of the local area.
492	The holder of IEA must ensure that an up to date emergency register is kept during all phases of the operation. This register must be made available upon request by the department.	• No evidence of an emergency register was provided to the auditor for review.	• Develop an Emergency Register for the Der Brochen Mine, or update the Mototolo Complex Emergency Register to include Der Brochen, if such a register already exists.

6.2 CONCLUSION AND WAY FORWARD

It is the opinion of the auditor and the peer reviewer/auditor, that the 2019 Der Brochen EMPr, still complies with the below requirements, as per Appendix 7, Section 3 (1) (e) of the NEMA EIA Regulations, 2014 (as amended) and:

- (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis;
- (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility in the case of a closure activity; and
- (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and the closure plan in the case of a closure activity.

The following conclusions apply to the remainder of Section 3 (1) of Appendix 7 of the NEMA EIA Regulations, 2014 (as amended):

- (f) a description of any assumptions made, and any uncertainties or gaps in knowledge; *it has been assumed that all of the information provided to the auditor during the site visit, site interviews and pre-and post-audit information reviews, were true and correct;*
- (g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report; *no consultation process was undertaken as part of this compliance audit;*
- (h) a summary and copies of any comments that were received during any consultation process; *no comments were received as no consultation process was undertaken;* and
- (i) any other information requested by the competent authority – *no other information requests have been received by the competent authority to date*.

Though the EMPr still fulfils its legal requirements, it is recommended, that when this 2019 Der Brochen Amendment Project EMPr is reviewed and updated, specifically for the Der Brochen Mine or as part of an EMPr update for the entire Mototolo Complex, cognisance is given to the following, as highlighted throughout this audit report and the previous years' external EMPr compliance audit reports:

- the Der Brochen Mine layout plans and Mine scope should be updated in one document to include a consolidation of the infrastructure and activities approved in this 2019 EMPr, as well as the updated Der Brochen Mine-specific infrastructure and activities approved in the 2021 Der Brochen-Mototolo Mine Complex Amended EMPr;
- the revised document should indicate the Mine components that have been constructed, those that are still part of the future Mine Plan, but have not commenced to date, and those that are authorised, but have been removed from the Mine scope, post-authorisation of the above-mentioned EMPrs, such as:
  - the co-disposal facility, that was originally designed and approved for the disposal of waste rock material and tailings material, however, recent amendments to the designs have been made by RPM to the co-disposal facility to consist of a waste rock embankment with lined containment dams within the embankment facility for the storage of raw (clean) water and dirty water as part of the mine's updated water management strategy - *as the Mareesburg TSF has been commissioned the co-disposal facility is no longer required for disposal of tailings*;
  - the 2019 Der Brochen Amendment Project EMPr does not include any construction nor operational management measures for the WRD embankment facility (*only closure actions were included*) - *the WRD embankment and construction activities on the previously authorised co-disposal facility footprint, is thus not audited in this 2019 EMPr Compliance Audit Report;*
  - the 2021 Der Brochen-Mototolo Mine Complex EMPr does not refer to the WRD embankment facility, but includes construction and operational management measures for the activities authorised on the co-disposal facility's footprint - *this section, in the separate external 2021 EMPr Compliance Audit Report, was thus audited in line with the construction activities associated with the development of the WRD embankment and activities related to the current*



construction of the Der Brochen Mine, on the footprint previously approved for the co-disposal facility;

- ~ stockpiling and crushing of the excavated terrace material on the authorised co-disposal facility footprint (*which was changed to consist of a waste rock embankment with lined containment dams*) and use as construction aggregate - the 2019 EMPr describes various closure commitments in the form of gradual backfilling and reprofiling of the landscape and excavations with the material removed and placed adjacent to the structures, states that all subsurface cavities will be backfilled, as well as the mobile crushing of ore mined from the Northern open-pit and the associated 2021 IEA authorises the 'Crushing and screening of platinum bearing rock' as a listed activity and states that 'Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons;'
- ~ the Dense Medium Separation (DMS) plant, to be located within the existing footprint area of the Mototolo Concentrator Plant area and DMS Stockpile with associated PCDs - the change in *use of the authorised DMS Stockpile area to store the excess material generated during construction of the Mareesburg TSF, including the name change to the Mareesburg stockpile, were communicated to the DMPR in an alignment meeting on 2 June 2025 (an amendment has been issued)*;
- ~ staff accommodation camp to be located near the Der Brochen Dam - *removed from the Mine scope*;
- ~ change of the authorised South open-pit to an underground mining operation - *authorised in the 2019 EMPr and 2021 IEA*;
- ~ decision on the way forward for the north open pit and associated north pit WRD, and if this area will be accessed via an adit/decline in future - *the 2024 external EMPr Compliance Audit Report raised concern regarding authorisation of the north WRD under NEMA and NEMWA, stating that an adit had been created and the WRD was now associated with underground mining - no adit has however been created in the north pit footprint, nor is there any WRD - discussions with RPM furthermore clarified that the north open pit and associated WRD are no longer part of the Mine Scope - the 2022 IEA for the 2021 Der Brochen-Mototolo Mine Complex Amended EMPr also states that: 'With regards to the Der Brochen Project, none of the waste management activities undertaken on site required authorisation under NEMWA as the waste management activity either did not exceed the waste volumes/thresholds stipulated in the Listed Waste Management Activities or the relevant NEMWA Regulations (GNR 921, as amended) were not yet published and promulgated;'*

» remove any conditions authorised, that have been proven in the external EMPr compliance audits of the past few years, to not be practically implementable at Der Brochen, or update these conditions to the current practices on site, such as:

- ~ 'Activities should be limited to months of low rainfall (dry season) where possible to reduce probability of potential impact.' - *this commitment is not feasible and should be rephrased in/removed from the EMPr, as construction timeframes are based on when a Mine's commissioning is required for continued safe operation of the Mine;*
- ~ the various conditions in the EMPr regarding fencing of graves and demarcation of sensitive habitats and zones of regulation, should be updated in the EMPr to specify: *demarcation on the construction drawings and signposted on site, as demarcation of sensitive areas through fencing, would cause additional disturbance in a Critical Biodiversity Area, endangered ecosystem, the Sekhukhuneland Centre of Endemism and potential floral endemics and TOPS.*
- ~ the EMPr condition regarding monitoring of control efficiencies when watering the temporary haul road should be rephrased to be more practically implementable, *such as monitoring of a visual dust plume*;
- ~ update of the Waste Management conditions in the EMPr, to be aligned to the current Mine practices - *waste is only temporarily stored at the Der Brochen South construction area, from where it is collected, and processed and disposed off-site*.

» correct any spelling and grammar errors in the EMPr, as well as the few incomplete sentences.

It is lastly recommended, as detailed in ***Table 7*** above, that actions be considered/developed to correct the remaining non-compliances related to this 2019 EMPr and 2021 IEA. Operational Management Procedures/Plans should also be developed for the life of the Der Brochen Mine, to replace/update the temporary method statements and plans that were only developed for the initial construction phase of the Mine: specifically the SWMP, Mine Inspection and Maintenance Procedure/Plan and Topsoil Stockpile Management Procedure/Plan.

ANNEX 1: Photolog of Evidence



Photo 1: Site demarcation peg



Photo 2: Mareesburg Nursery



Photo 3: Disturbance inside demarcated peg



Photo 4: DB access control at the box cut area



Photo 5: Designated smoking area on site

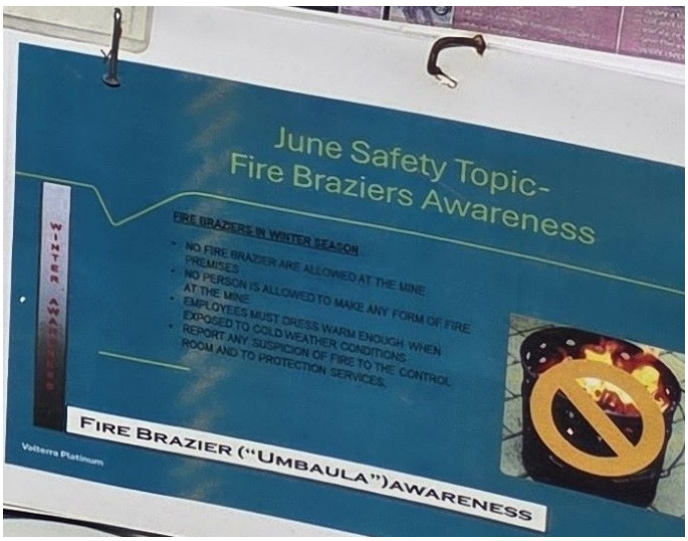


Photo 6: Valterra June 2025 Safety Topic



Photo 7: Waste management at Der Brochen



Photo 8: Wet suppression on dirt road



Photo 9: Rehabilitation of disturbed slopes



Photo 10: Successful rehabilitation



Photo 11: Culverts along the services corridor



Photo 12: Gabions to prevent erosion



Photo 13: Stormwater diversion channel



Photo 14: Terrace stormwater drain



Photo 15: Mine Service Water Dam



Photo 16: PCD under construction



Photo 17: Shaft settling ponds



Photo 18: Surfaced temporary workshop



Photo 19: WBHO oil storage in a container



Photo 20: Sump for dirty washwater



Photo 21: Self-bunded diesel tank on hardstand



Photo 22: No bunding/containment at workshop



Photo 23: Oil washing on bare ground



Photo 24: Insufficiently sized bunds



Photo 25: Hydrocarbon spills



Photo 26: Equipment parked with no drip trays



Photo 27: Non-containment of dirty water runoff



Photo 28: Spill Kits on site



Photo 29: Ablution facilities



Photo 30: Mandatory Hearing Protection Sign



Photo 31: Change in buffer - graves DBAP 11



Photo 32: Change in buffer - graves DBAP 15



Photo 33: Change in buffer - graves DBAP 21



Photo 34: WBHO Notice Board: Emergency contacts, Safety Rules and Safety Talk Topic



Photo 35: WBHO Laydown designated walkway, Fire Safety Rules Sign and Fire Extinguisher



Photo 36: WBHO Notice Board: Responsible First Aider and SHE Rep



Photo 37: WRD embankment with soil stockpiles



Photo 38: Slope stabilisation



Photo 39: Ore transfer point



Photo 40: Hazardous waste skip on bare ground

WASTE WANIFEST DOCUMENT 0280

Rietfontein 365 JT
Portion 9
Machadodorp
1170

Cell: 072 148 1539
e-mail: admin@wastelegends.co.za
www.wastelegends.co.za

WASTE LEGENDS (PTY) LTD
"YOUR TOTAL WASTE SOLUTION"

VAT No: 4800267207
REG No: 2013/111897/07

GENERATOR'S NAME AND ADDRESS - Consignor
Der Brochen

CAS BOOKING (DT No.): 0018087
3rd Party QUOTE no.:
Order No.:
Depot:
Vehicle Reg No.: Kf 36 MA GP
BIN Number:
DELIVERY DATE: 07-07-2025

WIS NUMBER:
Tel No: Fax No:

TRANSPORTER'S NAME AND ADDRESS - Operator
Waste Legends
Tel No: Fax No:

DISPOSAL SITE NAME AND ADDRESS - Consignee
Lydenburg ~~landfill Site~~ A-thermal

DATE DISPOSED: 08/07/25

Encapsulation Cell No:

Waste Details: HAZARDOUS NON HAZARDOUS LOW HAZARDOUS ☐

WASTE DESCRIPTION
Hazardous

SANS 10228 Class No:
Hazard:

Photo 41: Hazardous Waste Manifest

WASTE WANIFEST DOCUMENT 1234

9 Chrome Street
P.O. Box 8217
Lydenburg
1120

Tel: 013 235 3047
Fax: 013 235 4329
Cell: 072 148 1539
e-mail: admin@wastelegends.co.za
www.wastelegends.co.za

WASTE LEGENDS (PTY) LTD
"YOUR TOTAL WASTE SOLUTION"

VAT No: 4800267207
REG No: 2013/111897/07

GENERATOR'S NAME AND ADDRESS - Consignor
DER BROCHEM

CAS BOOKING (DT No.):
3rd Party QUOTE no.:
Order No.:
Depot:
Vehicle Reg No.: FJG 61HP MP
BIN Number:
DELIVERY DATE:

WIS NUMBER:
Tel No: Fax No:

TRANSPORTER'S NAME AND ADDRESS - Operator
WASTE LEGENDS
Tel No: Fax No:

DISPOSAL SITE NAME AND ADDRESS - Consignee
ACKERMAN SEWMILLS

DATE DISPOSED: 2025-06-05

Encapsulation Cell No:

Waste Details: HAZARDOUS NON HAZARDOUS LOW HAZARDOUS ☐

WASTE DESCRIPTION
SCRAP WOOD

SANS 10228 Class No:
Hazard:
Packing Group:

Photo 42: Waste Manifest for scrap wood

Waste Type: Used Lubricating Oil
Quantity (Litres or Kg):
Date of Collection:

WASTE GENERATOR

SAWIS/IPWIS/GWIS Reg No.
Company Name: DER BROCHEM
Tel No:
Physical address: HELENA FARM STELPORT 1133
Price Per Litre:
Waste Type: Used Lubricating Oil BLACK OIL
Collected Volume (Lts/Kgs): 1600 LTS
Water Percentage:
Date of Collection: JAN 2025
Province: EC KZN WC NW MP GP FS NC LMP
Municipality:
Vat No:
VAT 15%

ORIGIN/SOURCE OF WASTE (SIC) (Tick Box √)

HW0701R110		AGRICULTURE
HW0701R120		MINING
HW0701R160	X	WORKSHOP
HW0701R170		TRANSPORT
HW0702R560		OIL FILTERS
HW0701R130		FACTORY
HW0701R150		CONSTRUCTION

WASTE MANAGER (PROCESSOR)
Company Name:
Physical Address
Tel No:
Waste License No:
Date of Delivery:
Type of Waste Management Applied: Reused Recycled Recov
(Tick (√) whichever applicable) Treated Disposed Refine

USED OIL DIVERTED TO ANOTHER WASTE MANAGER
Company Name:
Physical Address
Tel No:
Waste License No:
Type of Waste Management Applied: Reused Recycled Recov
(Tick (√) whichever applicable) Treated Disposed Refine

Classification of Waste As per Safety Data Sheet
Special handling instructions As per Safety Data Sheet

Packaging: Drums Flow Bins Tanker
Transport Type: Bale Tanker Blast e Tr
Packaging Group: III X
UN Code: 3082 X Class 9
1268 Class 3
Low Hazard

Photo 43: Waste Manifest for used oil





Photo 44: Downward facing lights with covers



Photo 45: Covered conveyor



Photo 46: HDPE liner for the PCD



Photo 47: Erosion at the stormwater diversion channel's southern discharge point





Photo 48: Construction and haul road signs



Photo 49: Hazard warning signs



Photo 50: Hydrocarbon contaminated soil