RUSTENBURG PLATINUM MINES LIMITED

MOTOTOLO MINE COMPLEX

2025 Annual Environmental Compliance Audit:

Der Brochen-Mototolo Mine Complex Amended EMPr (May 2021) and Integrated Environmental Authorisation (March 2022)

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

COMPILED FOR

Valterra PLATINUM



COMPILED BY

Report #: MOTDB04-MOTC-EMPR05

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

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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 acquired 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, RPM 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, RPM 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***).

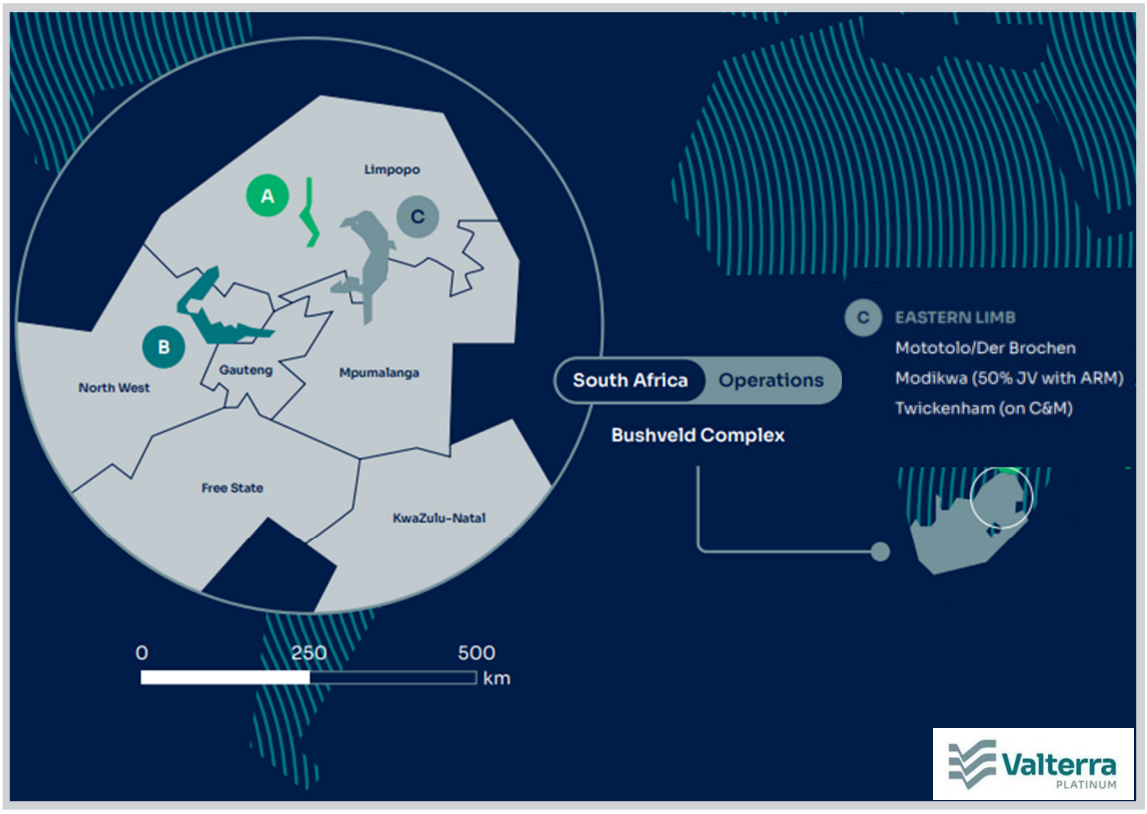


Figure 1: Location of the Mototolo Mine Complex

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*).

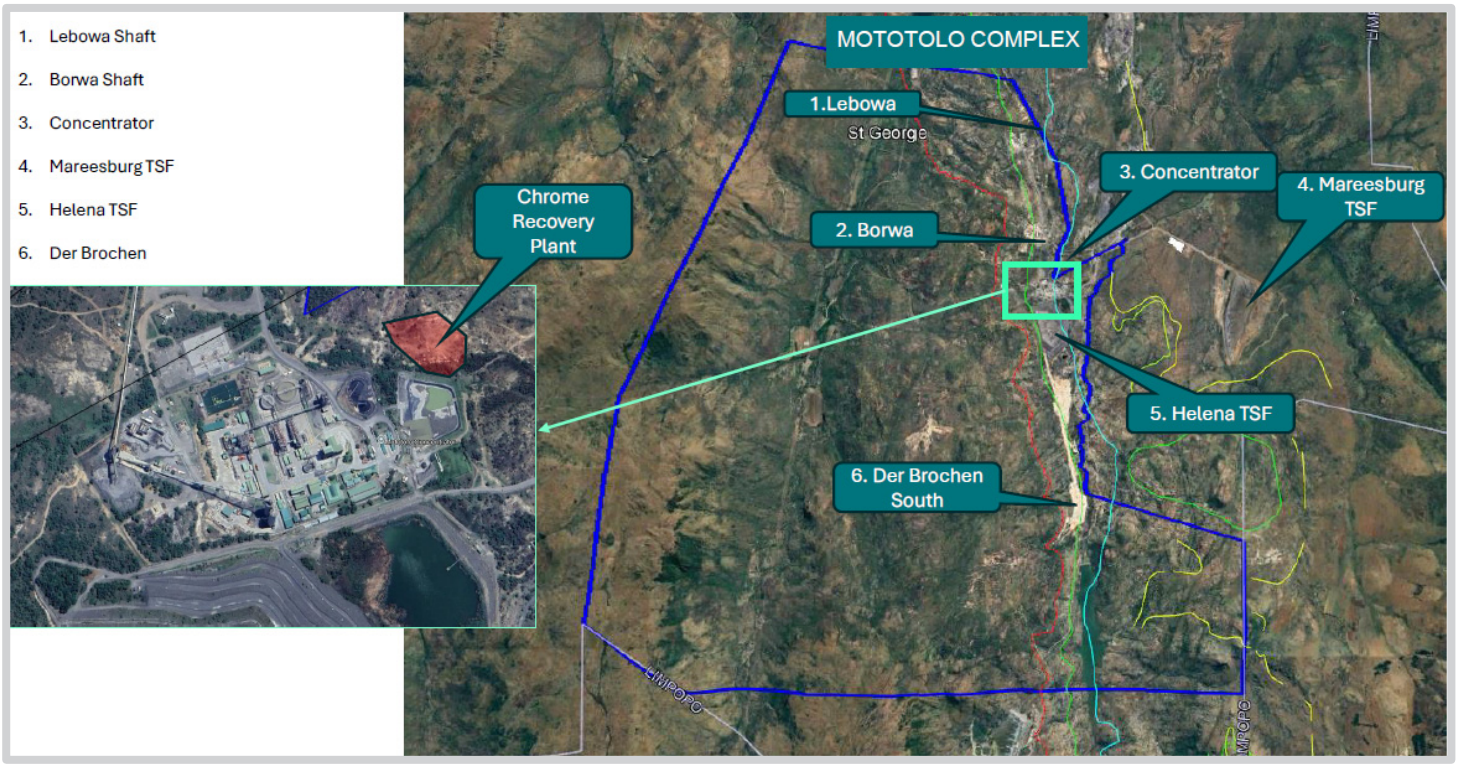


Figure 2: Mototolo Mine Complex operational areas

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.

RPM lodged a Section 102 Application to the DMPR on 2 November 2018, through the DMPR SAMRAD System (Ref: LP-00066-MR/102), in accordance with the MPRDA, to amend the Der Brochen Mining Right Area (MRA) to include the farms and relevant farm portions associated with Mototolo Mine. In addition to the Section 102 Application, RPM also submitted an application to the DMPR to amend the existing Environmental Authorisation (EA) for the Der Brochen Project in accordance with Regulation 31 of the Environmental Impact Assessment (EIA) Regulations, promulgated under the National Environmental Management Act, Act 107 of 1998 (NEMA), to include the approved activities and farm portions applicable to the Mototolo Mine. The Der Brochen Amendment Project EIAR and EMPr was submitted to the DMPR in November 2019 and approved on 26 November 2021, and included the construction of a buttress wall at the existing Helena TSF, the additional filter press plant at the existing Mototolo Concentrator, and the additional mining related infrastructure such as the South decline shaft and associated infrastructure (*this EMPr and IEA are audited in a separate 2025 external compliance audit*).

Further development of the Mototolo Mine Complex Plan required an additional amendment, which served as an amendment of both the authorised Mototolo Mine EMPr and the 2015 Der Brochen EMPr, with the main purpose and benefits of combining the two approved EMPrs into a single document, being

- it will provide RPM with a more effective environmental management tool to manage their current and latest acquired operations
- describe the existing approved infrastructure and activities associated with the Mototolo Mine and Der Brochen Mine in one document
- holistically describe the environment within which RPM will now operate
- update the status of environmental impacts and associated management measures based on the current activities associated with each of the operations
- allow for a greater level of alignment between the different EMPrs in terms of management measures and monitoring reporting requirements
- bring the authorised activities in line with what is taking at place at each of the operations
- rationalise repeated information and management measures contained within the approved EMPrs.

The Der Brochen-Mototolo Mine Complex Amended EMPr was submitted in May 2021 and approved by the DMPR in the Integrated Environmental Authorisation (IEA) dated 18/03/2022.

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 May 2021 Der Brochen-Mototolo Mine Complex Amended EMPr and its associated 2022 IEA.

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 4***)

(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 Mototolo Mine Complex's *then* (*2021*) current and authorised activities and infrastructure, as described in the 2021 EMPr, are summarised below and depicted in ***Figure 3***:

- existing infrastructure and activities:
  - underground mining at the Lebowa and Borwa decline shafts
  - taking water from underground and using it for mining purposes
  - operating conveyor systems
  - processing of platinum and chrome bearing ore at the Mototolo Concentrator Plant
  - deposition of tailings material onto the Helena TSF and operating the two associated Return Water Dams (RWDs)
  - deposition of tailings material onto the Mareesburg TSF and operating the four associated RWDs
  - utilisation of the offices and access roads
  - construction and utilisation of contractors' laydown area
  - undertaking prospecting activities comprising of site preparation, drilling of prospecting boreholes, site rehabilitation and monitoring within the MRA
  - abstraction of water from existing lawful use boreholes
  - abstraction of water from the Der Brochen Dam
  - waste management activities

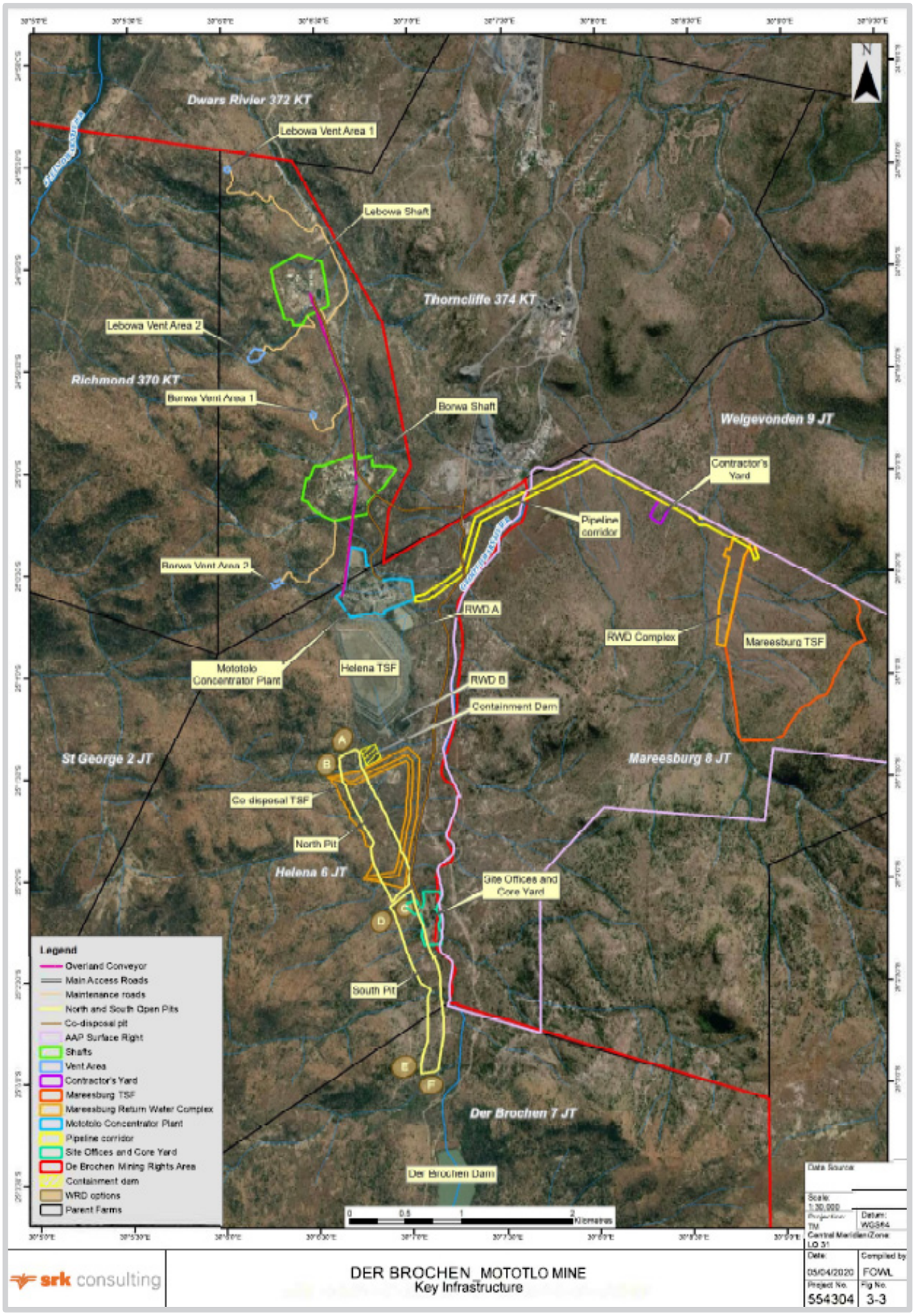


Figure 3: Der Brochen-Mototolo Mine Complex current and authorised activities and infrastructure

- authorised and completed activities:
  - raising of the Helena TSF
  - trial mining area on the Richmond farm (*activity is completed, and the soil stockpile and waste rock dump are well vegetated*)
  - Helena and Richmond shafts and associated Waste Rock Dumps (WRDs) (*one adit on Richmond opened and bulk sample taken - thereafter the project was closed and WRDs rehabilitated*)
- authorised activities which have not commenced:
  - the Helena and Richmond wellfields (only two of the authorised boreholes per well field currently in use)
  - two Open Pits (Northern and Southern Pits) and associated WRDs and PCD
  - re-routing of a 132 kV powerline
  - fish raceways
  - a Co-Disposal Facility (*tailings disposal with a rock embankment in the north pit*).

The 2021 EMPr also lists the Listed Activities that were previously authorised under the NEMA EIA Regulations, 2010 for both the Mototolo Mine and Der Brochen Project, as well as the listed waste management activities authorised under NEMWA, namely the Waste Management Licences (WMLs) for both the Lebowa and Borwa salvage yards. The 2021 EMPr furthermore clearly states that the report was compiled in support of a NEMA EIA Regulation 31 amendment, and that the process did not provide for any new/additional infrastructure or activities to be authorised.

This audit assessed the following applicable sections of the 2021 Der Brochen-Mototolo Mine Complex Amended EMPr, as well as the 2022 IEA in its entirety:

- ***Table 2*** of this report:
  - Table 9-4: Management measures in respect of the development of the co-disposal facility:
    - the 2019 Der Brochen EMPr states that '*the original Der Brochen Project included a 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*.'
    - this section was thus audited in line with the construction activities associated with the development of the WRD embankment and infrastructure and activities related to the northern footprint of the current construction of the Der Brochen Mine, on the footprint previously approved for the co-disposal facility, as:
      - 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 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
  - Table 9-5: Management measures in respect of the construction of Mareesburg TSF
  - Table 9-6: Management measures in respect of the construction of pipeline system associated with the Mareesburg TSF
  - Table 9-7: Management measures in respect of the relocation of the 132kV powerline - *these conditions have all been rated as Noted, as the relocation of the powerline has been delayed until Nov 2025*
  - Table 9-8: Management measures relation to social aspects to be implemented during construction phase

- ***Table 3*** of this report:
  - Table 9-10: Management measures in respect of the operation of the co-disposal facility (*current operational activities on the WRD embankment/Der Brochen (DB) North footprint, related to the WRD embankment and stockpiling, crushing and screening of material excavated from the Der Brochen South Shaft terrace, have been audited in this section*)
  - Table 9-11: Management measures in respect of the operation of the Mareesburg TSF and associated infrastructure and pipeline system
  - Table 9-12: Management measures in respect of operating the Helena TSF
  - Table 9-13: Management measures in respect of operating the Mototolo Concentrator and Chrome Recovery Plant
  - Table 9-14: Management measures in respect of utilising access roads
  - Table 9-16: Management measures in respect of the operation of the Borwa and Lebowa shafts and associated ventilation shafts
  - Table 9-17: Social management measures to be implemented during operations.

The following sections from the 2021 EMPr have been excluded from this audit:

- both Table 9-3 (*Management measures in respect of the development of the North and South Pits*) and Table 9-9 (*Management measures in respect of the operation of the North and South Pits*) have been excluded:
  - no activities have commenced in the authorised north pit footprint; and
  - as stated in the 2024 external EMPr Compliance Audit, during the time in which this 2021 EMPr Consolidation was reviewed by the Competent Authority, the Licence Holder submitted an amendment for the Der Brochen Project, changing the southern opencast pit to an underground decline shaft - the Der Brochen EMPr, dated November 2019 and approved on 26 November 2021, is audited in a separate external EMPr compliance audit report, which includes the Der Brochen South Shaft.
- Table 9-15: Management measures in respect of utilising the Helena and Richmond Wellfields and ongoing prospecting activities, is not applicable at present, as boreholes have been drilled, but the wellfields have not been developed;
- no decommissioning nor closure activities have commenced at the Mototolo Mine Complex, and the following sections of the 2021 EMPr were also excluded from this audit:
  - Table 9-18: Management measures in respect of the decommissioning and closure of the Mareesburg, Helena and Co-Disposal TSFs;
  - Table 9-19: Management measures in respect of the decommissioning and closure of the Der Brochen Project and associated infrastructure;
  - Table 9-20: Management measures in respect of the decommissioning and closure of the Borwa and Lebowa shafts and associated infrastructure;
  - Table 9-21: Social management measures to be implemented during decommissioning and closure phase.

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*) South African Council for Natural Scientific Professions (SACNASP), 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 RPM 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 RPM'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 May 2021 Amended EMPr and its associated 2022 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 2021 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 Mototolo Concentrator, TSFs and Mine Team. The RPM Environmental Specialist presented a description of the Mototolo Mine Complex areas to be audited (***Figure 2***). The Mototolo Concentrator was described as:

- processing ore supplied from Borwa Shaft, Lebowa Shaft and recently the Der Brochen South Shaft;
- infrastructure includes: Concentrator plant, ore stockpile, TSFs (*Mareesburg is operational and Helena is dormant*), RWDs, PCD, workshops, change house, sewage plant and filter press plant which was used to filter tailings for the Mareesburg TSF construction);
- the Chrome plant within the Concentrator footprint was added into the scope in late 2024 after RPM took over from Glencore;
- processing procedures involved generate tailings waste material;
- tailings from the Concentrator is transported through a pipeline for disposal into the Mareesburg TSF.

The Mototolo Mine was then described as including the Borwa (South) Shaft and Lebowa (North) Shaft, which were developed on the western boundary of the farm Thorncliffe to mine the UG2 layer for its high platinum content. The activities at the shafts are very similar, with ore from underground conveyed to the authorised ore stockpiles and then conveyed to the Mototolo Concentrator for processing.

Infrastructure at the shafts include ore stockpiles, PCDs, settler dams, engineering workshops, bulk diesel storage, salvage yards, change houses, sewage treat plants and other supporting facilities.
RPM also presented the Complex environmental authorisations, audit agenda and planned site visits.
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 Mototolo Mine Complex footprint authorised in the 2021 EMPr, was undertaken, as follows:

- Mototolo Mine: 24 June 2025;
- Mototolo Concentrator: 25 June 2025;
- Helena TSF: 25 June 2025;
- Mareesburg TSF: 26 June 2025.

The audit was undertaken 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);
- Selemela Mathekga - Environmental Officer (Mototolo Concentrator);
- Lifa Mangane - Environmental Officer (Mototolo Mine).

Various members of the RPM Management Team accompanied the auditors at the different Complex areas, as well as the contractors, such as SRK Consulting at the Mareesburg TSF and Fraser Alexander (FA) at the Helena TSF.

Table 1: Audit Compliance Rating Methodology

2024 RATING	2025 RATING		DEFINITION
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.
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.
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.
Other (Corrected Finding, Observation)			

The Post site 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 final report was updated to include all the RPM environmental team and legal review comments and submitted electronically to the RPM Environmental Manager.

5. AUDIT FINDINGS

Table 2 details the audit findings of the Mototolo Mine Complex footprint, as audited on 24-26 June 2025, specifically for the following construction activities as per the 2021 EMPr:

- Table 9-4: Management measures in respect of the development of the co-disposal facility [*current construction of the Der Brochen (DB) North footprint*]
- Table 9.5: Management measures in respect of the construction of Mareesburg TSF
- Table 9.6: Management measures in respect of the construction of pipeline system associated with the Mareesburg TSF
- Table 9.7: Management measures in respect of the relocation of the 132kV powerline - *these conditions have all been rated as Noted, as the relocation of the powerline has been delayed until Nov 2025*
- Table 9-8: Management measures relation to social aspects to be implemented during construction phase.

Table 3 describes the compliance levels of the operational activities on site against the conditions in the 2021 EMPr:

- Table 9-10: Management measures in respect of the operation of the co-disposal facility (*current operational activities on the WRD embankment/DB North footprint, related to the WRD embankment and stockpiling, crushing and screening of material excavated from the Der Brochen South Shaft terrace, have been audited in this section*)
- Table 9-11: Management measures in respect of the operation of the Mareesburg TSF and associated infrastructure and pipeline system
- Table 9-12: Management measures in respect of operating the Helena TSF
- Table 9-13: Management measures in respect of operating the Mototolo Concentrator and Chrome Recovery Plant
- Table 9-14: Management measures in respect of utilising access roads
- Table 9-16: Management measures in respect of the operation of the Borwa and Lebowa shafts and associated ventilation shafts
- Table 9-17: Social management measures to be implemented during operations

Table 4 lastly assesses the Mototolo Mine Complex's compliance against the IEA issued for the 2021 EMPr on 18/03/2022.

Annex 1 contains the Photolog of Evidence with photo numbering referenced in the tables below, as proof of the findings and clarification of the audit ratings.

Table 2: Der Brochen-Mototolo Mine Complex Amended EMPr (May, 2021) Compliance Audit Results - Construction Activities

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-4: Management measures in respect of the development of the co-disposal facility					
Soils, Land Capability and Land Use					
Loss of soil resources					
1	**C20 (refer to C1)**	• Soils will be stripped and stockpiled for use during rehabilitation. The following conservation principles will apply: o Stripped soil will be stored with as little compaction as possible; o Ensure the conservation of the seed bank; o Single handing will be practiced where possible; o Stockpiles that are likely to remain undisturbed for 12 months or more will be revegetated; o Land to which soil has been applied will be revegetated.	• The Topsoil Method Statement includes the construction sequence and method for soil stripping and stockpiling in the designated area. • Soils were stripped from the WRD embankment/DB North footprint (*previously authorised for the co-disposal facility)* and stockpiled, prior to construction commencing in Apr 2022. • The stockpiles are continuously being developed and used in concurrent rehabilitation, as the Mine is under construction, and are consequently not being vegetated.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21) • Post site audit clarifications	☑
Contamination of soil resources					
2	**C21 (refer to C2)**	• Conduct daily equipment inspections to detect leaks which may lead to hydrocarbon spills.	• Drivers check equipment for leaks on a daily basis and conduct inspections as per the Original Equipment Manufacturer (OEM) requirements.	• Post site audit clarifications	☑
3		• Regular maintenance of vehicles.	• Repairs are implemented as required at the temporary WBHO workshop.	• Post site audit clarifications	☑
4		• Placement of drip trays under vehicles when parked and during fuel transfer.	• The 2025 RPM internal inspection report of the DB North footprint depicts equipment parked with a drip tray underneath.	• Der Brochen Environmental Inspection Report, RPM (Jun 2025) • Photo 1 - DB North: parked equipment with drip tray underneath	☑
5		• Undertake on-site bioremediation or remove contaminated soils and dispose of at a licensed hazardous waste storage facility.	• The Hydrocarbon Management Procedure states that waste skips/drums are to be available in the workshop area should contaminated soil 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 ZW2L facility*.'	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Biodiversity					
Removal and loss of vegetation communities with a High / Medium-High Significance including wetland/ephemeral systems					
6	**C22 (refer to C3)**	• The Open Pit footprint areas will be clearly marked to contain activities within the designated area.	• 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 (*the WRD embankment/DB North footprint covers part of the previously authorised north open pit*). • The Topsoil Method Statement states that: '*The area where topsoil is to be stripped must be demarcated such that the disturbed area is minimised as far as is practical*'.	• Post site audit clarifications • Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	☑
7		• Prior to construction, the areas surrounding each footprint area will be marked to prevent further destruction of the surrounding vegetation communities, specifically near the riparian areas Protect surrounding sensitive areas.			☑
8		• Consideration will be given to the harvesting of vegetation (trees and medicinal plants) by stakeholders prior to final stripping of vegetation. Such a programme will be developed in consultation with stakeholders and access to the mine area will be controlled by RPM.	• Threatened or Protected Species (TOPS) were rescued by specialists Agreenco Environmental Projects (Pty) Ltd (Agreenco) from WRD embankment/DB North footprint, but stakeholders were not given access to harvest vegetation.	• Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020) • Post site audit clarifications	☒
9		• Create biodiversity awareness with construction crew and Environmental Control Officer (ECO) on site through training sessions and the preparation of a Biodiversity Awareness Programme.	• The site Environmental Induction for all contractors and employees, includes a discussion on biodiversity, environmental authorisations and permits for relocating or destroying sensitive flora. • Biodiversity awareness forms part of the monthly Mototolo Mine Complex Environmental Talk Topics.	• Review of slides from the Mototolo Complex SHEQ Induction • Mototolo Complex: Environment: The importance of wetlands, Feb 2025	☑
10		• Appoint a biodiversity specialist to identify CI species within the Open Pits footprint for potential relocation or to be grown in the onsite nursery for use during rehabilitation.	• The Conservation Manager and specialists Agreenco, are responsible for relocation of all floral 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 Master Plan includes the WRD embankment/DB North footprint as part of the planned TOPS rescue areas.	• Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020) • Photo 2 - Mareesburg Nursery	☑
11		• All CI species identified within the footprint of the Open Pits that can successfully grow *ex situ* will be translocated and the necessary permits applied for.	• Agreenco's project handover reports (2022) show the WRD embankment/DB North footprint where TOPS were rescued and relocated from. • No proof could be provided of permits for the farm Helena 6 JT.	• Project Handover Report, Agreenco (22/02/22) • Project Handover Report, Agreenco (23/02/22) • Photo 3 - DB North: TOPS relocation area	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
12	C22 (refer to C3)	• Establish an onsite nursery for the growing and storing of plants for use in rehabilitation, including *Vitex* species.	• The Mareesburg Nursery is run by the Mototolo Mine Complex Conservation Manager and specialists Agreenco, with the purpose of rescuing and cultivating floral TOPS for rehabilitation purposes. • There are *Vitex sp* grown in the nursery.	• Photo 2 - Mareesburg Nursery visited on 26/06/25 • It has been established through ongoing research that *Vitex obovata subsp. wilmsii* is only one of the preferred species for *D. sylvia - it is recommended that this condition in the EMPr be aligned to the latest Cicada research.*	☑
13		• The Cicada population will be monitored during the mining phases. The mine is participating in ongoing studies of the invertebrate fauna.	• Scientific Aquatic Services (SAS) undertook the annual Cicada assessment in Dec 2024, to determine the status and distribution within the Groot-Dwars River Valley and comparing that data to previous studies. • RPM is also consulting with Northam Platinum, who are conducting Cicada research at their adjacent Booysendal Mine.	• Annual *Dyticopycna sylvia* (*Pycna sylvia*) Assessment, SAS, Jan 2025	☑
Increase in Alien invasive species					
14	C23 (refer to C4)	• Ensure excavation equipment entering the site is cleaned and free of any seed propagules (this includes soil imports into the area- certificates required from source).	• No evidence was provided of inspections of excavation equipment entering the site.	• No certificates provided.	☒
15		• An Alien Invasive Management Plan is required for all current and future operations.	• The Invasive and Alien Vegetation Procedure describes the identification of Invasive and Alien Plants (IAP) through surveys, the principles of the clearing plan and implementation of the identified methods. • The WRD embankment/DB North footprint is however not currently included in Agreenco's scope of work for IAP eradication, but will be added in future.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009)	☒
16		• Educate the Construction crew on the identification and eradication of the top 10 alien species found within the area. Create an induction programme at commencement of the project.	• All contractors and employees attend the Mototolo Mine Complex SHEQ Induction prior to commencing work on site. • Monthly Environmental Topics (*displayed on site and included in Toolbox Talks*), have included information on alien species.	• Review of slides from the Mototolo Complex SHEQ Induction	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Wetlands					
Increase in erosion and sediment loads					
17	**C24 (refer to C5)**	• Clearly demarcate areas to be cleared and ensure that vegetation clearing only occurs within the demarcated areas.	• 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. • The Topsoil Method Statement states that: '*The area where topsoil is to be stripped must be demarcated such that the disturbed area is minimised as far as is practical*'.	• Post site audit clarifications • Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	☑
18		• Ensure that erosion management and sediment controls are strictly implemented from the beginning of site clearing activities.	• The 2025 RPM internal inspection report of the DB North footprint reported various areas of erosion, such as on the berms along the access road to the site, with management measures still being implemented post clearing of the footprint.	• Der Brochen Environmental Inspection Report, RPM (Jun 2025)	☒
Impact on riparian zone					
19	**C25 (refer to C6)**	• Provide adequate contractor laydown areas.	• Specific areas for contractor laydown areas have been established within the area demarcated for construction. • Laydowns areas are also indicated on the construction layout drawing.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • Der Brochen General and Site Development overall infrastructure Site Plan Layout, DRA (05/03/2024)	☑
20		• Contractor laydown areas will not encroach into drainage line / riparian areas or their respective buffer zones.	• Floodlines and the EIA approved boundaries are demarcated on the construction drawing and the perimeter was furthermore pegged prior to clearing - all construction activities are within the approved footprint.	• Der Brochen General and Site Development overall infrastructure Site Plan Layout, DRA (05/03/2024)	☑
21		• Vehicles will remain on demarcated roads and not encroach into drainage line / riparian areas or their respective buffer zones.	• All vehicles are restricted to the main access and haul roads.	• Site audit observations and interviews (26/06/25)	☑
Loss of habitat and increased erosion during construction of the starter wall					
22	**C26**	• Wherever possible, infrastructure will be placed outside of drainage line areas to reduce loss of habitats.	• The WRD embankment/DB North infrastructure and activities are located within the approved WRD embankment facility footprint, which is located outside of the 1:100 year floodline.	• Post site audit clarifications • Review of the aerial photo and site layout plans	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
23	C26	• Topsoil stockpiles will not be placed directly adjacent to drainage lines or riparian features and measures such as berms and hessian curtains will be implemented to prevent erosion and sedimentation.	• The WBHO Temporary SWMP addresses various berms to be placed at the stockpiles, around infrastructure areas and haul roads to prevent flooding, where applicable. • The stockpiles are continuously being developed and used in concurrent rehabilitation, as the Mine is under construction, and are consequently not being vegetated.	• WBHO: Der Brochen South Shaft 240 kt Project - Temporary Storm Water Management Plan (28/03/23)	☑
Surface Water					
Increase in erosion from areas of exposed soils during site clearing and grubbing					
24	C27 (refer to C8)	• Flood protection berms will be constructed where the Southern pit footprint falls within the 1:100 year floodline.	• This section applies to the WRD embankment/DB North footprint (*co-disposal facility*) and not the southern open pit (*which was changed to an underground mining operation - authorised in the 2019 EMPr and 2021 IEA*)	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov 2019)	N/A
25		• Erosion control measures in the form of temporary erosion prevention berms will be implemented during construction.	• A berm was constructed around the topsoil stockpile, but no evidence was provided on the construction of any other temporary erosion prevention measures. • The 2025 RPM internal inspection report of the DB North footprint, recorded various areas of erosion.	• Der Brochen Environmental Inspection Report, RPM (Jun 2025)	☒
26		• Clean water diversion bunds will be constructed upstream of a construction site prior to clearing areas for new infrastructure.	• No evidence was provided on the construction of clean water diversion bunds prior to clearing.	• Site audit information review	☒
27		• Paddocks will be constructed downstream of the working activities to minimise uncontrolled runoff from the site.	• No evidence was provided on the construction of downstream paddocks. • The 2024 external audit also noted that paddocks had not been constructed.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☒
28		• Areas disturbed by construction activities will be rehabilitated immediately on completion of construction at each area.	• No rehabilitation has been conducted in the WRD embankment/DB North footprint, but this will be addressed in future.	• Conservation Manager interviews and post site audit clarifications	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Increased potential for damming and flooding and subsequent damage to property and infrastructure due to hardstanding areas					
29	**C28 (refer to C9)**	• Stormwater measures will be appropriately designed to allow for free flow of water.	• No information was provided to the auditor on the design of stormwater measures in the WRD embankment/DB North footprint.	• Site audit information review	☒
30		• Areas will be appropriately graded to prevent ponding.	• The Topsoil Method Statement states that: '*A Grader will be used to grade the haul roads*' and '*Rollers will be used to compact the haul roads*' and '*The topsoil stockpile should be generally free draining. This should prevent water from pooling and stagnating on the toe of the stockpiled topsoil or on large portions of the topsoil stockpile footprint*'.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	☑
Deterioration in surface water quality due to spillages and accidental discharges					
31	**C29 (refer to C10)**	• Clean water diversions will be constructed prior to clearing areas for new infrastructure.	• No evidence was provided on the construction of clean water diversion bunds prior to clearing.	• Site audit information review	☒
32		• Hazardous substances and potentially polluting materials will be stored in appropriately bunded areas located outside of the riparian zone. Bunds will be designed for a capacity of 110% of the stored material.	• No hazardous substances are stored at the WRD embankment/DB North footprint. Hydrocarbons are stored in bunded areas at the central workshop.	• Post site audit clarifications	☑
33		• Servicing and maintenance of vehicles and equipment will be done outside the riparian zone in appropriate facilities designed for this purpose.	• Servicing and maintenance of vehicles and equipment is conducted at the central workshop, which is located outside of the 1:100 year floodline.	• Post site audit clarifications	☑
34		• Contractors will 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.	• The 2024 external audit states that: '*Personnel who work with hazardous waste at Der Brochen were trained to deal with potential hazardous situations through toolbox talks conducted. Training material and attendance registers were provided for verification.*'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
35		• Contractors will be made aware of the WUL conditions that apply during construction and will be held liable for environmental damages caused by spillages.	• The EMPr and WUL authorisations and conditions were/are shared with all the Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
36	C29 (refer to C10)	• Emergency action plans will 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)	☑
37		• Contaminated runoff (excluding that contaminated by hydrocarbons) will be contained and reused as necessary e.g. for dust suppression.	• Runoff is diverted around the WRD embankment/DB North footprint via a concrete trench which reports to the operational northern ore stockpile PCD.	• Post site audit clarifications	☑
38		• Chemical toilets will be provided at construction sites.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Site audit observations (24-26/06/25)	☑
Alteration of catchment hydrology causing change in watercourse functionality and increased risk of flooding and scouring					
39	C30	• Runoff from the catchment will be diverted away from the Co-Disposal Facility by cut-off channels and diversion berms designed to handle the 1:50 year storm event.	• Runoff is diverted around the WRD embankment/DB North footprint via a concrete trench which reports to the operational northern ore stockpile PCD. A berm was furthermore constructed around the topsoil stockpile area.	• Post site audit clarifications	☑
40		• Energy dissipaters will be constructed in areas of concentrated flows.	• Energy dissipation measures have not yet been implemented.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☒
41		• Routine inspections and maintenance will be conducted to keep the diversions free of debris (silt build up, vegetation etc.) and areas suitably graded.	• No evidence was provided on the inspection and maintenance of stormwater management infrastructure.	• Site audit information review	☒
Deterioration of surface water quality due to use of waste rock in construction					
42	C31	• Dirty water that is generated will be contained on site for reuse.	• Runoff is diverted via a concrete trench to the northern ore stockpile PCD and generated dirty water is pumped to the same PCD for reuse.	• Post site audit clarifications • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
43	C31	• Provide chemical toilets at construction sites.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Site audit observations (24-26/06/25)	✓
Air Quality					
Increase in nuisance dust					
44	C32 (refer to C12)	• Undertake dust suppression where feasible on stockpiles and materials handling activities.	• The Topsoil Method Statement states that: o '*A watercart will be used to control dust at the work area*'.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	✓
45		• Undertake dust suppression or chemical stabilization of unpaved roads.	• The Topsoil Method Statement states that: o '*Construction haul roads will be created around the topsoil stockpile work area and haul roads that lead to the designated stockpile area; this haul road will be kept moist to avoid dust*'. o '*A water cart will spray the haul roads*'.		✓
46		• Haul trucks to be restricted to specified haul roads.	• The Topsoil Method Statement states: '*Haul road leading to the topsoil stockpile will be equipped with sufficient signage and or flag persons to direct haul traffic accordingly*'.		✓
47		• Speed limit on unpaved roads not to exceed 40 km/hr.	• The Mototolo Mine Complex Traffic Management Procedure states: 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 Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	✓
Noise					
Increase in ambient noise levels					
48	C33	• Construction vehicles will be serviced at regular intervals to minimise noise generation.	• Vehicles and equipment are serviced at the temporary central workshop, in line with the OEM schedule.	• Post site audit clarifications	✓
49		• The contractors/RPM will respond to public complaints about noise.	• A grievance register is kept for the Mototolo Mine Complex. • 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.	• Mototolo Complex Grievance Register, 2025	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Cultural Heritage					
Impact on cultural heritage sites					
50	**C34 (refer to C14)**	• Graves and cemeteries in the footprint areas are to be exhumed and relocated in accordance with mandated procedure by a qualified Archaeologist.	• Two grave sites were recorded in the footprint authorised for the co-disposal facility in the 2021 EMPr, namely: AA44b and AA124. Both sites are however located west of the services corridor in areas not yet cleared and not currently part of the construction activities being undertaken on the WRD embankment/DB North footprint. Grave removal will be required if these site are to be affected in future.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: Integrated Report, Archaeological Resources Management (Apr 2012) • Photo 4 - DB North: cultural heritage sites west of the WRD embankment facility footprint	N/A
51		• Heritage sites within the footprint areas rated low to high significance, require a permit from SAHRA for the demolition thereof.	• The only heritage site within the current WRD embankment/DB North footprint was DBAP 14. PGS Heritage (PGS)'s 2019 Heritage Impact Assessment (HIA) rated the site as low significance, due to it being poorly preserved without any associated cultural material present, with no mitigation required.	• Heritage Impact Assessment: Proposed Der Brochen Amendment Project, PGS (08/09/19)	N/A
52		• The necessary permits for grave relocation will be obtained from the South African Heritage Resources Agency (SAHRA).	• No graves are currently affected on the WRD embankment/DB North footprint (refer to Condition 50 above).	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: Integrated Report, Archaeological Resources Management (Apr 2012)	N/A
53		• The identified ruins (AA110) will be mapped by a qualified Archaeologist and permits should be obtained prior to demolishment.	• Site AA110 was described in the 2012 HIA as a hotel (with water tank and rooms) that burned down before it could be opened for business, and was rated as being of medium significance, with the recommended mitigation stated as mapping. • The 2019 PGS HIA rated the same complex as being of medium significance. • The complex is recorded in the RPM Cultural Heritage (CH) inventory and mitigation will be implemented if the site is to be affected by future mining activities.	• Der Brochen Project and Mototolo Complex: Integrated Report, Archaeological Resources Management (Apr 2012) • Heritage Impact Assessment: Proposed Der Brochen Amendment Project, PGS (08/09/19) • Photo 4 - cultural heritage sites west of the WRD embankment facility footprint	N/A
54		• Undertake a Phase 2 Heritage Impact Assessment to further assess heritage sites identified during the impact assessment.	• The only heritage site within the current WRD embankment/DB North footprint was DBAP 14. PGS Heritage (PGS)'s 2019 HIA rated the site as low significance, due to it being poorly preserved without any associated cultural material present, with no mitigation required.	• Heritage Impact Assessment: Proposed Der Brochen Amendment Project, PGS (08/09/19)	N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Visual					
Decrease in visual aesthetics of the area					
55	**C35**	• Minimise vegetation clearing to the demarcated footprint area of the Co-Disposal Facility.	• 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. • The Topsoil Method Statement states that: '*The area where topsoil is to be stripped must be demarcated such that the disturbed area is minimised as far as is practical*'.	• Post site audit clarifications • Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	☑
Traffic and transportation					
Increased generation of traffic on existing road networks during construction					
56	**C36 (refer to C16)**	• Traffic conditions to be monitored annually, should traffic congestion increase, appropriate mitigation measures will be explored and implemented.	• The various Traffic Management Plans (TMPs) do not refer to the monitoring of traffic conditions, or mitigation measures.	• No evidence was provided of traffic assessments.	☒
Impact on pedestrians and cyclists					
57	**C37 (refer to C17)**	• Control access by cyclists and pedestrians to the site.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services.	• Site audit observations and interviews (24-26/06/25)	☑
Impact on road safety conditions					
58	**C38 (refer to C18)**	• Drivers of heavy construction vehicles should attend a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road.	• Equipment drivers obtain the applicable permits, licences and training to safely operate specific construction vehicles.	• Site interviews (26/06/25)	☑
Decreased condition of the road network					
59	**C39 (refer to C19)**	• Develop a standard operating procedure for mine drivers to identify and report on potholes and road edge breaks to the operations manager who in turn will report it to the relevant authorities.	• The 2024 external audit states that: '*A Road Safety Disciplinary Procedure has been developed and is currently in draft format. This has however not as yet been implemented as it is in draft format.*'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • No evidence was provided of this or another procedure regarding road conditions.	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-5: Management measures in respect of the construction of the Mareesburg TSF					
Soils, Land Capability and Land Use					
Loss of soil resources at sites where Tailings Dam starter walls will be located					
60	**C40**	• Topsoil of the Tailings Dam is to be removed to build the starter walls, where feasible, part of the topsoil will be left to form a clay floor layer. Wet tailings are to be deposited into the dam.	• The 2024 external audit refers to the findings in the 2022 external audit, prior to construction of the Mareesburg TSF (MTSF) in Nov 2018, as follows: o *"A soil stripping plan was developed for construction activities at Mareesburg TSF. From a review of the plan: 'Mareesburg TSF - Soil Management Plan, dated October 2017' and prepared by SRK Consulting, the following soil stripping requirement is included: "The "Utilisable" soil will be stripped to a depth of 750 mm or until hard rock/calcretes and/or ferricrete is encountered. These soils will be stockpiled together with any remaining vegetation cover present. The total stripped depth should be 750 mm, wherever possible."*	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • Photo 5 - topsoil stockpiles	☑
61		• A soil stripping plan will be developed to ensure that, as far as is practical, sufficient soil can be obtained at each site to provide for the rehabilitation requirements at that site.			☑
62		• Soil which has been stripped will be stockpiled for use in rehabilitation.			☑
63		• Soil will be cleared only from those areas to be affected by immediate construction.	• The MTSF is being constructed in phases (Phase 4 is currently underway) and clearing is done as required for construction to progress.	• Site audit and interviews (26/06/25)	☑
64		• Where the contractors are required to spoil material, spoil sites will be identified which are environmentally acceptable and approved by the ECO.	• This condition is noted by the Mototolo Mine Complex. • No spoil sites have been identified.	• Site audit and interviews (26/06/25)	ⓘ
65		• Following construction, all remaining denuded areas such as dam walls will be ripped if necessary, graded to an even surface and covered with available topsoil to a depth of approximately 150 mm prior to re-vegetation.	• Agreenco's Technical Note on the completed hydroseeding of the MTSF, that commenced on 25/02/2019, states that the embankment was scarified prior to seeding, with the grader's ripping blades set at 500 mm. • The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and all denuded areas will be ripped and graded during concurrent and final rehabilitation prior to revegetation.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19)	ⓘ
66		• Soil not used for rehabilitation on completion of the Construction Phase will be retained for use in rehabilitation of parts of the site during operations and following closure.	• This condition is noted by the Mototolo Mine Complex.	• Site audit and interviews (26/06/25)	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
67	C40	• Energy dissipaters will be constructed at points where there are concentrated discharges of water to the environment (such as at culverts and outflows of water from diversion canals) which can cause significant erosion. The effectiveness of these energy dissipaters will be checked periodically.	• SRK's Phase 4 design report describes the existing rock lens dissipator structures that were designed and constructed during the Phase 1 construction works, to dissipate the concentrated stormwater flows reporting to the northern and southern stormwater outlets. • Site assessments of extensive erosion along the exposed excavated slopes of the stormwater channel and exposed areas of Phase 1 of the MTSF, led to a redesign in 2021 and the reconstruction of larger stormwater channel rock lens dissipators. • The 2019 as-built drawing depicts the energy dissipaters.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22) • Mareesburg Tailings Dam Phase 1 - General Arrangement, SRK (08/11/19)	☑
68		• Stormwater berms will be provided downslope of areas recently stripped of vegetation to ensure that silt-laden stormwater does not flow directly into the Groot-Dwars River or the Der Brochen dam.	• SRK's Phase 4 design report includes a clean water separation berm along the Phase 4 Starter wall, to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks. The paddocks have been created by putting cross walls between the starter wall and stormwater berm. Cross walls have been placed downstream of the reinforced concrete chambers.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
69		• Monitoring of the contractors' activities to identify areas of erosion.	• SRK's Phase 4 design report states that the new gabion type rock lenses, to be placed at regular intervals within the corridor bunded area perpendicular to the flow direction, will act as temporary detention structures and would control the runoff more efficiently; have a reduced impact to the surrounding environment and are easily accessible for maintenance and monitoring. • SRK's annual TSF inspection report furthermore describes findings of erosion. • The RPM Environmental Officer conducts monthly inspections, which includes the identification of areas of erosion. • RPM lastly also conducts quarterly inspections with the TSF Engineer, SHE team, Concentrator Engineer and Concentrator manager.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024) • Site audit and interviews (26/06/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
70	C40	• Eroded areas will be repaired where necessary.	• As stated above, the eroded areas identified in Phase 1 of the MTSF, were repaired. • However, during this audit period, erosion was evident along the disturbed steep slopes adjacent to the northern stormwater channel, as well as smaller gullies forming along the road to the northern stormwater channel. • Erosion was also noted along the main access road, where a natural spring keeps filling up and seeping and flowing downgradient. Temporary measures were implemented to allow the spring to flow freely, and cross the road, but this is causing erosion and affecting the integrity of the road and potentially contaminating the spring water.	• All eroded areas on site require repair, rehabilitation and revegetation. • Photo 6 - erosion along the northern stormwater channel • Photo 7 - erosion along the main access road due to a natural spring • Photo 8 - temporary measures to allow the natural spring to cross the access road • Photo 9 - erosion due to insufficient measures where the spring enters the natural environment	☒
71		• Construction of water management infrastructure will commence prior to the construction of Tailings Storage Facility to prevent soil erosion.	• The SRK Civil design report states that the Phase 1 pre-deposition works included the: o *'Excavation and construction of all temporary and permanent stormwater control channels and trenches.'*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
Loss of land of arable/grazing potential					
72	C41	• The area of land to be disturbed and isolated for the purpose of construction, mining and processing activities will be limited, as far as is practical, to the minimum required for safe and efficient operation.	• 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. • The SRK Civil design report furthermore states that clearing and grubbing activities were restricted above the stormwater cut-off for Phase 1, to limit potential erosion and sheet wash.	• Site audit and interviews (26/06/25) • Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
73		• Preparation of a detailed land management plan as part of the feasibility work for the possible conservancy. This plan will determine the use and management of natural areas.	• A Biodiversity Action Plan (BAP) was developed for Der Brochen, covering the full Mototolo Mine Complex MRA, and includes land management recommendations for the four Management Units described for the footprint. • No conservancy has been developed within the Mototolo MRA.	• Der Brochen Biodiversity Action Plan, SAS (Jan 2023)	☑
74		• The footprint extent of the project has been designed to where possible, only impact on the Tailings Storage Facility and associated infrastructure.	• The Environmental Officer monitors site creep outside the authorised footprint.	• Site audit and interviews (26/06/25)	☑

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75	C41	• Minimise the area that can be potentially impacted on (eroded, compacted, sterilised or de-nutrified).	• The site perimeter was pegged prior to construction and site creep is monitored.	• Site audit and interviews (26/06/25)	☑
Biodiversity					
Loss of natural habitat					
76	C42	• The area of land disturbed and isolated for the purpose of construction, mining and processing activities will be limited, as far as is practical, to the minimum required for safe and efficient operation.	• 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.	• Site audit and interviews (26/06/25)	☑
77		• No unnecessary destruction of vegetation will be allowed and, in particular, construction workers will not be allowed to harvest any trees for use as firewood or any other purpose.	• The site Environmental Inductions specify that the collection of firewood and plant species are prohibited.	• Site audit and interviews (26/06/25)	☑
78		• The ECO will undertake periodic audits of the effectiveness of the EMP on site.	• The RPM Environmental Officer conducts monthly EMPr compliance inspections.	• Environmental Inspection Reports	☑
79		• The following principles will apply to bush and tree clearing: o any bush or tree clearing outside of prescribed areas will require the approval of the ECO; o bush and tree clearing will be kept to the absolute minimum within the prescribed areas; o where temporary structures are to be erected, it will be done so as to maximise the protection of trees and other natural features; o the ECO will inspect all areas, in consultation with a specialist, prior to bush and tree clearing, and mark the species to stay intact or to be transplanted; o all timber derived from bush or tree clearing will be made available, free of charge, to local inhabitants (where applicable). Contractors will not be allowed to sell any wood.	• Environment Research Consulting (ERC) and Agreenco conducted the first site visit at the MTSF from 25-26/01/17 to assess the diversity of trees and other plant species that should be included in a project to relocate (rescue) them; a follow-up visit was conducted from 11-12/07/17 during which specimens were identified, marked for removal and extracted from the MTSF footprint. • Agreenco compiled an update note confirming the relocation of various protected tree species from the expansion footprint of the MTSF, either directly to a relocation area or to the Mareesburg Nursery, completed by 19/12/2019. • The Conservation Manager and specialists Agreenco, are responsible for relocation of all floral TOPS to the Mareesburg Nursery, based on the 2020 Master Plan. • The 2020 Master Plan describes the assessment of the MTSF Phase 1-4 footprints, as well as the rescue of trees and harvesting of root cuttings. • Cleared wood from TSF Phase 1 and 2 were made available to the community for collection.	• Findings and Recommendations regarding the relocation of plant species from Mareesburg Farm, Der Brochen after a site visit at the start of the plant removal process, ERC (19/07/17) • Progress Note MBTSF_200324: Update on the current state of the Der Brochen Protected Tree Nursery, Agreenco (24/03/20) • Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020) (*will be updated in Q4 2025 to include all activities to date and planned future rescue areas*) • Post site audit clarifications	☑

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80	C42	• The mine will investigate the need to establish a medicinal plant nursery that will be under supervision of the ECO.	• The Mareesburg Nursery is run by the Mototolo Mine Complex Conservation Manager and specialists Agreenco, with the purpose of rescuing and cultivating floral TOPS for rehabilitation purposes.	• Photo 2 - Mareesburg Nursery visited on 26/06/25	☑
81		• Priority, rare and endangered species will be identified and removed.	• ERC and Agreenco conducted the first site visit at the MTSF from 25-26/01/17 to assess the diversity of trees and other plant species that should be included in a project to relocate (rescue) them; a follow-up visit was conducted from 11-12/07/17 during which specimens were identified, marked for removal and extracted from the MTSF footprint. • The Conservation Manager and specialists Agreenco, are responsible for relocation of all floral TOPS to the Mareesburg Nursery, based on the 2020 Master Plan. • The 2020 Agreenco Progress Note details the: o translocation of TOPS species, endemic species and medicinal plants from the MTSF Phase 1 footprint in 2017 o TOPS species from the Phase 2 and 3 TSF footprints in 2019, including the propagation of root cuttings of plants that could not be re-located (*predominantly due to terrain-enforced access restrictions*) o the Phase 4 area was already assessed as part of the Phase 2 and 3 projects with many of the trees already removed or root cuttings harvested in 2019; some plants, located in drainage lines in the northern sections of the Phase 4 area, could not be relocated in 2019 due to unsafe access conditions, and the report recommended the propagation of plants to replace these TOPS plants.	• Findings and Recommendations regarding the relocation of plant species from Mareesburg Farm, Der Brochen after a site visit at the start of the plant removal process, ERC (19/07/17) • Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020) • Progress Note MBTSF_200324: Update on the current state of the Der Brochen Protected Tree Nursery, Agreenco (24/03/20)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
82	C42	• On completion of the Construction Phase, disturbed areas will be graded and topsoiled. The topsoiled areas will then be re-vegetated using indigenous pasture species.	• The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and all denuded areas will be ripped, graded, topsoiled and revegetated once handed over by the construction team. • Agreenco's 2019 Technical Note describes their assessment of the hydroseeding of the MTSF's embankment, which commenced on 25/02/2019.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment	
83		• Prior to revegetating the disturbed areas, soil samples will be collected and analysed. If necessary, the soil will be fertilised in accordance with the findings of the soil analysis.	• The Agreenco Technical Note on the hydroseeding on the Phase 1 TSF embankment, recommended: "*soil samples be analysed during the follow-up assessment and an additional fertiliser application be conducted based on the soil chemical analysis*", but no proof of this sampling was provided. • SAS conducted a soil and land contamination assessment, including soil sampling, at the MTSF in Feb 2025, but the purpose was to assess the possible changes in soil chemical characteristics surrounding the TSF.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Soil Contamination Assessment of the impacts of the historic & current storage of hazardous waste materials on soil chemical parameters at the Mototolo & Mareesburg TSFs, Limpopo Province, SAS (Apr 2025)	
84		• Following re-vegetation, the site will be monitored and maintained until a sound cover that will prevent erosion has been achieved.	• The Conservation Manager, Environmental Officer and specialists Agreenco, monitor all rehabilitated areas, with maintenance including the application of booster fertilizer 6 weeks post germination, as well as the eradication of IAP.	• Site audit and interviews (26/06/25)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
85	C42	• The biodiversity specialists will be required to survey the marked out surface infrastructure area in detail prior to clearing to identify plants (number and location) ahead of clearing for purposes of the permit applications.	• ERC and Agreenco conducted the first site visit at the MTSF from 25-26/01/17 to assess the diversity of trees and other plant species that should be included in a project to relocate (rescue) them; a follow-up visit was conducted from 11-12/07/17 during which specimens were identified, marked for removal and extracted from the MTSF footprint. • The 2020 Agreenco Progress Note details the: o translocation of TOPS species, endemic species and medicinal plants from the MTSF Phase 1 footprint in 2017 o TOPS species from the Phase 2 and 3 TSF footprints in 2019, including the propagation of root cuttings of plants that could not be re-located (*predominantly due to terrain-enforced access restrictions*) o the Phase 4 area was already assessed as part of the Phase 2 and 3 projects with many of the trees already removed or root cuttings harvested in 2019; some plants, located in drainage lines in the northern sections of the Phase 4 area, could not be relocated in 2019 due to unsafe access conditions, and the report recommended the propagation of plants to replace these TOPS plants.	• Findings and Recommendations regarding the relocation of plant species from Mareesburg Farm, Der Brochen after a site visit at the start of the plant removal process, ERC (19/07/17) • Progress Note MBTSF_200324: Update on the current state of the Der Brochen Protected Tree Nursery, Agreenco (24/03/20)	☑
86		• The necessary permits will be obtained before any clearing of the site takes place.	• Permits for TOPS are obtained following the specialist site surveys, prior to clearing commencing.	• Licence LP - SDM - 0025 - 2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 13 May 2024 - 13 May 2025, DFFE (13/05/24)	☑
87		• Plants that are to be translocated for conservation purposes will be removed under the guidance of a recognized taxonomist/ecologist and planted in a conservation area of similar habitat.	• The Agreenco 2020 Master Plan states that: "*Prior to construction activities, floral TOPS species that will be directly impacted upon need to be marked and removed to a suitable similar habitat or nursery as part of a rescue and relocation plan*;" • The report also refers to the work being conducted by Environmental Specialists.	• Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020)	☑

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88	**C42**	• Plants that are to be removed for rehabilitation purposes will be removed and replanted in a nursery under the guidance of a recognized landscaper. The mine will be responsible for the operation of the nursery until such time as rehabilitation has been completed.	• The Conservation Manager and specialists Agreenco, are responsible for relocation of all floral TOPS to the Mareesburg Nursery, based on the 2020 Master Plan. • The Agreenco 2020 Master Plan also states that: "*Use of 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. This will assist in areas were regrowth is not to acceptable standard.*"	• Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020)	☑
Disturbance/loss of vegetation species and communities of conservation importance, loss of biodiversity and the risk of losing unknown biodiversity due to clearing of vegetation					
89		• The necessary permits for removal of CI plants will be obtained before any clearing of the site takes place.	• Permits for TOPS were obtained following the specialist site surveys, prior to clearing commencing.	• Licence LP - SDM - 0025 - 2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 13 May 2024 - 13 May 2025, DFFE (13/05/24)	☑
90	**C43**	• A qualified horticulturist will supervise mitigation measures for Priority Plant Species (Conservation Important Species) activities.	• The Agreenco specialists, responsible for the identification, rescue and relocation of TOPS, consist of a team of restoration ecologists, who are registered Professional Natural Scientists (*PrSciNat*) with the South African Council for Natural Scientific Professions (SACNASP), and surveys are done in consultation with a qualified horticulturist. • Agreenco is supervised by the RPM Conservation Manager who is also a *PrSciNat*. • The various EMPr Floral Specialist Assessments were furthermore undertaken by ecological specialists.	• www.agreenco.co.za • Post site audit clarifications	☑
91		• The horticulturist will search the transportation corridor area for more individuals of the priority species, especially of *Cyphostemma wilmsii* (which will not be translocated unless unavoidable).	• Agreenco's 2022 Technical Note confirms that: '*no protected plant surveys were conducted before the construction of the pipeline*'.	• Technical Note: Assessment of post-construction vegetation establishment in rehabilitated areas along the Mareesburg TSF Pipeline, Agreenco (25/02/22)	☒

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92	C43	• Any decisions regarding the fate of populations of these priority species will only be made after consultation with the vegetation specialists.	• This condition is noted by the Mototolo Mine Complex, if the species is discovered in any surveys. • Agreenco confirmed that *Cyphostemma wilmsii* was not observed during their 2022 post-construction survey of the pipeline corridor, nor during their 2017 pre-construction survey of the MTSF, when only *Cyphostemma segmentatum* was found, but is not of conservation concern.	• Post site audit clarifications • Technical Note: Assessment of post-construction vegetation establishment in rehabilitated areas along the Mareesburg TSF Pipeline, Agreenco (25/02/22)	ℹ
93		• Vegetation specialists will be employed to identify individual specimens or populations for possible relocation. Specialists will be involved in establishing a relocation procedure that will include timing and selecting new locations for the plants.	• The Technical Note describes that Agreenco were appointed to conduct site visits between June and October 2017, to identify and relocate Red-listed, endemic and medicinal trees and shrubs from the footprint of the MTSF. • The Technical Note also includes an assessment of the plants in the Mareesburg Nursery on 05/03/2019, as well as recommendations regarding further plant relocation and collection of plant material for propagation, in consultation with a qualified horticulturist.	• Technical Note: Mareesburg TSF: Nursery Assessment, Agreenco (11/03/19)	✓
94		• The mine will investigate the need to establish a medicinal plant nursery that will be under supervision of the ECO.	• The Mareesburg Nursery is run by the Mototolo Mine Complex Conservation Manager and specialists Agreenco, with the purpose of rescuing and cultivating floral TOPS for rehabilitation purposes.	• Photo 2 - Mareesburg Nursery visited on 26/06/25	✓
95		• Any natural building materials will also be made available to neighbouring rural dwellers following their application to the ECO. The access to the area for harvesting of such materials will be controlled and supervised by the ECO.	• Cleared wood from the MTSF Phase 1 and 2 were made available to the community for collection.	• Post site audit clarifications	✓
96		• Specialist interest groups such as Operation Wildflower could be invited to participate in plant rescues prior to the commencement of activities.	• Agreenco managed the rescue of TOPS, with the involvement of the DFFE and LEDET.	• Post site audit clarifications	✓
Displacement or disturbance of animal life (and their migration paths) as a result of construction activities					
97	C44	• The Mareesburg TSF footprint area will be clearly demarcated to contain construction activities within the designated area.	• 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.	• Site audit and interviews (26/06/25)	✓
98		• The area of habitat disturbed and isolated for the purpose of mining and processing activities will be limited, as far as is practical, to the minimum required for safe and efficient operation.		• Site audit and interviews (26/06/25)	✓

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99	C44	• Staff will be instructed that no hunting or unnecessary disturbance of wildlife will be allowed on mine property and that transgressors will be severely dealt with. Strict anti-poaching measures will be enforced and the mine will promptly investigate and respond to complaints of poaching. Measures include: o Access control; o Specific travel routes; o Area to be fenced; o The area will be patrolled; o Disciplining and prosecution of offenders; and o Separate rules may emanate from the possible conservancy.	• The Environmental Inductions state that harming of faunal species are prohibited. • The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services. • 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.	• Environmental Officer interview (26/06/25) • Fence Zone Map	☑
100		• Noise disturbance to wildlife will be limited by using only pre-determined access routes and restricting noise.	• The site construction team are advised by the environmental department that no disturbances outside the Mine footprint is allowed, with construction vehicles restricted to the main access and haul roads.	• Site audit observations and interviews (26/06/25)	☑
101		• Biodiversity awareness will be created with the construction crew and Environmental Officer on site.	• The site Environmental Induction for all contractors and employees, includes a discussion on biodiversity, environmental authorisations and permits for relocating or destroying sensitive flora. • Biodiversity awareness forms part of the monthly Mototolo Mine Complex Environmental Talk Topics.	• Review of slides from the Mototolo Complex SHEQ Induction • Mototolo Complex: Environment: The importance of wetlands, Feb 2025	☑
Disturbance/loss of insect species/communities of conservation value due to loss of habitat and habitat fragmentation					
102	C45	• Following construction, all disturbed areas will be rehabilitated.	• The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and all denuded areas will be ripped, graded, topsoiled and revegetated once handed over by the construction team. • Agreenco's 2019 Technical Note describes their assessment of the hydroseeding of the MTSF's embankment, which commenced on 25/02/2019.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment	ⓘ

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103	C45	• The Cicada population will be monitored during the mining phases. The mine is participating in ongoing studies of the invertebrate fauna.	• SAS undertook the annual Cicada assessment in Dec 2024, to determine the status and distribution within the Groot-Dwars River Valley and comparing that data to previous studies. • RPM is also consulting with Northam Platinum, who are conducting Cicada research at their adjacent Booysendal Mine.	• Annual *Dyticopycna sylvia* (*Pycna sylvia*) Assessment, SAS, Jan 2025	☑
104		• If possible, Vitex species identified within the footprint of the Mareesburg TSF will be translocated.	• The Mareesburg Nursery is run by the Mototolo Mine Complex Conservation Manager and specialists Agreenco, with the purpose of rescuing and cultivating floral TOPS for rehabilitation purposes. • There are *Vitex sp* grown in the nursery.	• Photo 2 - Mareesburg Nursery visited on 26/06/25 • It has been established through ongoing research that *Vitex obovata subsp. wilmsii* is only one of the preferred species for *D. sylvia – it is recommended that this condition in the EMPr be aligned to the latest Cicada research.*	☑
Loss of communities that have a National, Provincial and Local significance and Conservation Importance species					
105	C46	• Consider implementation of biodiversity offsets which will require a detailed investigation to find similar habitat to conserve.	• 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)	☒
106		• Appoint a biodiversity specialist to identify CI species that can successfully grow *ex situ*. These species must be translocated and the necessary permits from DEFF and LEDET must be applied for.	• Agreenco was appointed to identify and relocate TOPS species within the MTSF footprint. • The 2020 Agreenco Progress Note details the translocation of TOPS species, including the propagation of root cuttings of plants that could not be re-located (predominantly due to terrain-enforced access restrictions). • Agreenco was furthermore given consent to apply for the required tree relocation permits on Mareesburg Farm. • Agreenco and RPM obtained the necessary protected plant and tree permits prior to clearing of each phase of the MTSF's development.	• Progress Note MBTSF_200324: Update on the current state of the Der Brochen Protected Tree Nursery, Agreenco (24/03/20) • RPM Letter of Consent to DFFE for Agreenco to submit protected tree relocation permit applications on behalf of RPM at Der Brochen and Mareesburg Farms, Mototolo Complex (13/10/22) • Licence LP - SDM - 0025 - 2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 13 May 2024 - 13 May 2025, DFFE (13/05/24)	☑
107		• Obtain the necessary regulatory authorisation for crossing any of the streams / drainage lines or wetlands.	• The 2017 Der Brochen Water Use Licence (WUL) and 2023 Amendment authorise the water uses associated with the MTSF, including the pipeline, road and powerline crossing the Groot Dwars River and tributaries of the Mareesburg Stream.	• Rustenburg Platinum Mines Limited: Der Brochen: Licence in terms of Chapter 4 of the National Water Act, 1998 (Act No. 36 of 1998): Licence No. 06/B41G/ABCFGIJ/5329 (10/05/17) • Amendment of Licence in terms of Section 158 of the National Water Act, 1998 (Act No. 36 of 1998): Rustenburg Platinum Mines Limited: Der Brochen (31/03/23)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
108	C46	• Where the road/Pipeline traverses a wetland, measures will be implemented to ensure that the road has minimal effect on the flow of water through the wetland, e.g. by using box culverts rather than pipes.	• A natural spring was noted during the audit alongside the MTSF access road. The spring keeps filling up and flowing downgradient. Temporary measures were implemented to allow the spring to flow freely, and cross the road, but this may potentially cause contamination to the spring water. No culverts have been installed.	• Permanent measures are required to protect the spring and allow water to flow freely without the risk of contamination. • Photo 7 - erosion along the main access road due to a natural spring • Photo 8 - temporary measures to allow the natural spring to cross the access road • Photo 9 - erosion due to insufficient measures where the spring enters the natural environment	✗
Increase in Alien invasive species					
109	C47 (refer to C4)	• Ensure excavation equipment entering the site is cleaned and free of any seed propagules (this includes soil imports into the area- certificates required from source).	• No evidence was provided of inspections of excavation equipment entering the site.	• No certificates provided.	✗
110		• An Alien Invasive Management Plan is required for all current and future operations.	• The Invasive and Alien Vegetation Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • The Agreenco Service Acceptance Letter (SAL) describes the IAP eradications at the MTSF.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Service Acceptance Letter: YEAR 2: 2nd Eradication - selective Alien and Invasive Plant Eradication: Anglo American Platinum: Mareesburg TSF, pipeline and Mototolo Concentrator, Agreenco (30/08/24)	✓
111		• Educate the Construction crew on the identification and eradication of the top 10 alien species found within the area. Create an induction programme at commencement of the project.	• All contractors and employees attend the Mototolo Mine Complex SHEQ Induction prior to commencing work on site. • Monthly Environmental Topics (*displayed on site and included in Toolbox Talks*), have included information on alien species.	• Review of slides from the Mototolo Complex SHEQ Induction	✓
Wetlands					
Increase in erosion and sediment loads resulting in the loss of wetland habitats and ecoservices					
112	C48	• Clearly demarcate areas to be cleared and ensure that vegetation clearing only occurs within the demarcated areas.	• 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.	• Post site audit clarifications	✓
113		• Ensure that erosion management and sediment controls are strictly implemented from the beginning of site clearing activities. Minimise the footprint and control edge effects.	• The SRK Civil design report states that the Phase 1 pre-deposition works included the: o '*Excavation and construction of all temporary and permanent stormwater control channels and trenches*.'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
114	C48	• Restrict preparation of the construction site to drier months to decrease the potential for erosion caused by rainfall.	• The 2024 EMPr Compliance Audit Report states that construction of the MTSF was initiated in July 2017. • This matches the date reported by Agreenco, as the start of the relocation of protected trees and plants from the footprint, prior to clearing of Phase 1 of the MTSF. • Construction however continued throughout the years until first deposition in Nov 2018, and has continued as the MTSF phases 1-4 have been developed and the dam commissioned.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • Technical Note: Mareesburg TSF: Nursery Assessment, Agreenco (11/03/19) • *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*	☑
			Impact on riparian zone		
115	C49 (refer to C6)	• Provide adequate contractor laydown areas.	• Contractor laydown areas were observed at the MTSF's Stefanutti Stocks (SS) contractor's yard and at the MTSF construction site.	• Photo 11 - laydown area at the contractors' yard • Photo 12 - contractors' laydown area at the Mareesburg TSF	☑
116		• Contractor laydown areas will not encroach into drainage line / riparian areas or their respective buffer zones.	• All laydown areas are outside the 1:100 year floodline and the 100 m regulated zone.	• Mareesburg Tailings Dam Phase 1 - General Arrangement, SRK (08/11/19) • Mareesburg Ph4 Tailings Dam Phase 4 Development General Site Layout, SRK (12/01/23)	☑
117		• Vehicles will remain on demarcated roads and not encroach into drainage line / riparian areas or their respective buffer zones.	• All vehicles are restricted to the main access and haul roads.	• Site audit observations and interviews (26/06/25)	☑
			Impact on drainage line habitat		
118	C50 (refer to C7)	• Where possible, infrastructure will be placed outside of drainage line areas to reduce loss of habitats.	• The MTSF is located outside of the Groot Dwars River and Mareesburg Stream, but the TSF is located on some non-perennial tributaries of the Mareesburg Stream and the pipeline, road and powerline corridor crosses both the Groot Dwars River and the Mareesburg Stream, as well as both their tributaries. • The 2017 Der Brochen Water Use Licence (WUL) and 2023 Amendment authorise the water uses associated with the MTSF.	• Rustenburg Platinum Mines Limited: Der Brochen: Licence in terms of Chapter 4 of the National Water Act, 1998 (Act No. 36 of 1998): Licence No. 06/B41G/ABCFGIJ/5329 (10/05/17) • Amendment of Licence in terms of Section 158 of the National Water Act, 1998 (Act No. 36 of 1998): Rustenburg Platinum Mines Limited: Der Brochen (31/03/23)	☑
119		• Topsoil stockpiles will not be placed directly adjacent to drainage line or riparian features and measures such as provision of berms and hessian curtains will be implemented to prevent erosion and sedimentation.	• The topsoil stockpiles are not located directly adjacent to drainage lines and berms are in place surrounding the area.	• Site audit observations and interviews (26/06/25) • Photo 5 - Topsoil Stockpiles	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
120	C50 (refer to C7)	• Clear separation of clean and dirty water will take place and diversion of clean water around operational areas must ensure minimisation of the loss of catchment yield.	• Northern and Southern clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility. The channels flow into the northern and southern concrete stepped channels, with the discharge flowing through energy dissipaters before discharging into the Mareesburg Stream. • The clean water separation infrastructure also include intermediate stormwater bunds. • A clean water separation berm was also included along the Phase 4 starter wall to ensure that dirty runoff stormwater, generated from the MTSF walls, will be contained in paddocks. • The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (*RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced*).	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
Surface Water					
Deterioration of surface water quality due to increased sediment loads as a result of erosion					
121	C51	• A stormwater management plan, including watercourse diversions, will be implemented at the onset of construction.	• Stormwater management measures were detailed in the initial 2020 TSF Phase 2 civil design report, as well as additional measures to manage clean and dirty water in the updated 2022 Phase 4 detailed design report.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
122		• Construction of water management infrastructure will commence prior to the TSF.	• The SRK Civil design report states that the Phase 1 pre-deposition works included the: o '*Excavation and construction of all temporary and permanent stormwater control channels and trenches*.'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
Deterioration of surface water quality due to contamination of runoff by oil and fuel spills and leaks, and other construction activities					
123	C52	• Construction areas and construction campsites will be provided with earth berms which will divert clean stormwater runoff and prevent this water from entering such working areas.	• SRK's Phase 4 detailed design report states that a clean water separation berm was included along the Phase 4 starter wall to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
124	C52	• Re-vegetation of all denuded area.	• The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and all denuded areas will be ripped, graded, topsoiled and revegetated once handed over by the construction team.	• Site audit observations of the Phase 1 TSF embankment already rehabilitated (26/06/25)	ℹ
125		• A leak/spill detection plan will be devised and implemented for all possible areas of leak/spillage within the construction site.	• The Hydrocarbon Management Procedure details the actions required for the prevention and management of spills and leaks.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	☑
Deterioration of surface water quality due to erosion, spillages and accidental discharges at the Pipeline crossings					
126	C53	• Clean stormwater cut-off drains with diversion berms will be positioned to divert stormwater from the sites. The drains will be designed to accommodate a 1:50 year storm and diversion berms will assist to divert a 1:100 year storm. Stormwater diverted by these drains and berms will be redirected towards the natural watercourses in the area.	• The SRK Civil design report states that: o *'the services corridor has been designed to cross streams and rivers above the 1:100 year (24-hour) storm event floodlines'* o *'the river and stream crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure'* o *'the stormwater diversion berms will be built and sized for the PMF-storm event at closure; this will exceed the Regulation 704 requirement that stipulates that the diversion berm be sized for a 1:50 year storm event.*' • All stormwater management infrastructure were designed to divert clean stormwater back into the natural watercourses.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
127		• All storage areas will be bunded and will have a peripheral collection drain, with oil interceptors (if required).	• All hazardous substances at the SS contractor's yard were stored in bunded areas with impermeable floors, oil separators and peripheral drains.	• Photos 13-14 - diesel storage in bunded area, with collection drain and oil separator	☑
128		• Daily checks will be conducted by the contractors on the dispensing mechanism of above-ground storage tanks to ensure the timeous identification of faults.	• The SS SHE Rep/Safety Officer conduct daily site checks, which include leak and spill detection.	• Site audit observations and interviews (26/06/25)	☑
129		• Collection containers (e.g. drip trays) will be placed under all dispensing mechanisms of hydrocarbon or hazardous liquid substances to ensure contamination from leaks and dispensing is contained.	• The diesel refuelling station is bunded and concrete lined, as well as the storage area for the diesel bowser. • Drip trays were observed under all parked equipment.	• Photos 15-16 - bunded, concreted refuelling areas and drip trays under parked equipment	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
130	C53	• The dispensing mechanism of diesel will be stored in a container when not in use.	• The dispensing mechanisms are fixed to the diesel pumps and bowser, respectively, and are both located on impermeable surfaces, within a bunded area, with peripheral drains and oil separators.	• Site audit observations (26/06/25)	N/A
131		• Liquid wastes will not be disposed of in stormwater drains. Details regarding proposed methods for treatment of pollutants will be submitted by contractors to the ECO for acceptance prior to treatment.	• Hazardous waste is managed in line with the Mototolo Mine Complex Waste Management Procedure: o '*…hazardous waste will be disposed into black wheelie bins and impermeable skips with lids before transported to salvage yard/sorting area for further sorting* o *hazardous waste skips will be fitted with a bund wall which is designed to contain any spillage*.' • The Hazardous waste is transported separately off-site by an external contractor trained in handling these materials.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 17 - hazardous waste skip at the SS contractor's yard, on a concrete surface with bund wall	☑
132		• Any spillage, irrespective of its size, will be contained and cleaned up immediately.	• The Mine and contractors (SRK and SS) are aware of this condition. • No spills on bare ground were observed at either the contractor's yard, or at the MTSF construction site. • Spill kits were observed at the contractor's yard. • The Hydrocarbon Management Procedure describes the clean-up of chemical spills and hydrocarbon spills, as well as the remediation of all polluted sites.	• Photo 18 - spill kits • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	ⓘ
133		• Contractors will ensure that adequate measures (e.g. attenuation/settlement dams or oil absorbent products) are in place to prevent pollution. A method statement will be required from the contractors to this effect.	• Spill kits were observed at the contractor's yard.	• Photo 18 - spill kits	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
134	**C53**	• Stormwater culverts at watercourse crossings will be designed and constructed to accommodate the 1:50 year storm event.	• The SRK Civil design report states that: o *'the services corridor has been designed to cross streams and rivers above the 1:100 year (24-hour) storm event floodlines'* o *'the river and stream crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure'* o *'the stormwater diversion berms will be built and sized for the PMF-storm event at closure; this will exceed the Regulation 704 requirement that stipulates that the diversion berm be sized for a 1:50 year storm event.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
135		• Areas disturbed by linear construction activities will be rehabilitated immediately on completion of construction of each area.	• Erosion was evident during this 2025 audit along the disturbed steep slopes adjacent to the northern stormwater channel, as well as smaller gullies forming along the road to the northern stormwater channel. • Erosion was also noted along the main access road, where a natural spring keeps filling up and seeping and flowing downgradient. Temporary measures were implemented to allow the spring to flow freely, and cross the road, but this is causing erosion and affecting the integrity of the road and potentially contaminating the spring water.	• All eroded areas on site require repair, rehabilitation and revegetation. • Photo 6 - erosion along the northern stormwater channel • Photo 7 - erosion along the main access road due to a natural spring	☒
136		• Erosion protection and energy dissipaters will be constructed at the crossings as applicable.	• Culverts and gabions were observed at the pipeline crossings over drainage lines. • The SRK Civil design report states that: o '*the river and stream crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure.*'	• Site audit observations (26/06/25) • Photo 19 - erosion protection where the pipeline crosses a drainage line • Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
137		• Contractors will 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 Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Site interviews (26/06/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
138	C53	• 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)	☑
139		• Chemical toilets will be provided at construction sites.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Photo 20 - chemical toilets at the TSF construction site	☑
Increase in erosion from areas of exposed soils during site clearing and grubbing					
140	C54 (refer to C8)	• Flood protection berms will be constructed where the Southern pit footprint falls within the 1:100 year floodline.	• This applies to the previously authorised Der Brochen Open Pit, which was replaced by the Der Brochen South Shaft, which is assessed in a separate Annual Compliance Audit Report of the 2019 EMPr.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov 2019)	N/A
141		• Erosion control measures in the form of temporary erosion prevention berms will be implemented during construction.	• SRK's Phase 4 detailed design report states that a clean water separation berm was included along the Phase 4 starter wall to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
142		• Clean water diversion bunds will be constructed upstream of a construction site prior to clearing areas for new infrastructure.	• The SRK Civil design report states that the Phase 1 pre-deposition works included the: o '*Excavation and construction of all temporary and permanent stormwater control channels and trenches*.'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
143		• Paddocks will be constructed downstream of the working activities to minimise uncontrolled runoff from the site.	• SRK's Phase 4 detailed design report states that a clean water separation berm was included along the Phase 4 starter wall to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
144	C54 (refer to C8)	• Areas disturbed by construction activities will be rehabilitated immediately on completion of construction at each area.	• Only the Phase 1 embankment was rehabilitated, including hydroseeding. • Several areas of erosion were noted at the MTSF during the audit, where construction has been completed, and have not been rehabilitated.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment • Photo 6 - erosion along the northern stormwater channel • Photo 7 - erosion along the main access road due to a natural spring	☒
Increased potential for damming and flooding and subsequent damage to property and infrastructure due to hardstanding areas					
145	C55 (refer to C9)	• Stormwater measures will be appropriately designed to allow for free flow of water.	• The SRK Civil design report states that: "*The top surface will be reshaped to be free draining via an engineered spillway*."	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
146		• Areas will be appropriately graded to prevent ponding.	• The SRK Civil design report states that: *"Regrading of the top surface will be undertaken if required, to ensure that the surface is free draining and drains towards the closure spillway."* • SRK's Phase 4 detailed design report furthermore states that: *"A V-drain has been provided parallel to, and along the full length the service road. The drain is to ensure that no ponding occurs on, or adjacent to, the service road. The V-drain has been placed on the upstream side of the service road to avoid crossflow over the road surface."*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
Deterioration in surface water quality due to spillages and accidental discharges					
147	C56 (refer to C10)	• Clean water diversions will be constructed prior to clearing areas for new infrastructure.	• The SRK Civil design report states that the Phase 1 pre-deposition works included the: o '*Excavation and construction of all temporary and permanent stormwater control channels and trenches*.'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
148		• Hazardous substances and potentially polluting materials will be stored in appropriately bunded areas located outside of the riparian zone. Bunds will be designed for a capacity of 110% of the stored material.	• All hazardous substances at the SS contractor's yard were stored in bunded areas with impermeable floors, oil separators and peripheral drains. • The hazardous waste skip is also bunded on a concrete surface.	• Photos 13-14 - diesel storage in bunded area, with collection drain and oil separator • Photo 17 - hazardous waste skip at the SS contractor's yard, on a concrete surface with bund wall • Photo 21 - flammable substances cage • Photo 22 - hazardous substances cage	☑
149		• Servicing and maintenance of vehicles and equipment will be done outside the riparian zone in appropriate facilities designed for this purpose.	• Servicing of vehicles and equipment is done at the SS workshop at the contactor's yard, located outside the riparian zone.	• Photo 23 - SS workshop	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
150	C56 (refer to C10)	• Contractors will 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.	• Mototolo Mine Complex has appointed a Hazardous Materials Coordinator, responsible for the purchase, storage, issue and accounting for any hazardous substances used at Mototolo Mine Complex which (if not properly supervised) could result in death/injury/ illness to any employee, contractor or the public, or in product contamination. • Evidence was also provided of up-to-date training of the Concentrator and MTSF responsible person for the management of hazardous chemicals.	• Hazardous Materials Coordinator, SHE/2025/312, Mototolo Complex (10/04/25) • Certificate of Competence: Hazardous Chemical Handling, CPME (14/06/25)	☑
151		• Contractors will be made aware of the WUL conditions that apply during construction and will be held liable for environmental damages caused by spillages.	• The EMPr and WUL authorisations and conditions were/are shared with all the Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑
152		• Emergency action plans will 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)	☑
153		• Contaminated runoff (excluding that contaminated by hydrocarbons) will be contained and reused as necessary e.g. for dust suppression.	• SRK's Phase 4 design report states that runoff stormwater, generated from the MTSF walls, will be contained in paddocks. • The report also states that temporary diversions channels are placed upgradient of developing RWD Ponds 3 and 4, to divert any excess stormwater runoff between the clean stormwater diversion and the tailings deposition area back to the environment, thereby limiting the need for dirty water storage at the RWD complex. • No evidence was provided of dust suppression on site, or reuse of runoff water.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
154	C56	• Chemical toilets will be provided at construction sites.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Photo 20 - chemical toilets at the TSF construction site	☑
Air Quality					
Increased dust levels during construction of infrastructure and roads					
155	C57	• The contractors and the mine will control dust on the site and access roads to acceptable levels, with water, chemical soil stabilisers or temporary surfacing.	• A significant dust plume was observed on the MTSF during the audit. • The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression on the MTSF. • This condition is rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Photo 24 - Mareesburg TSF dust plume • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	ⓘ
156		• The mine will undertake monthly dust monitoring at various locations along the main access road and shaft access roads until these are tarred.	• Monthly dust fallout (DFO) monitoring is undertaken by GCS Water and Environment (Pty) Ltd (GCS) at various sampling locations (single dust buckets) surrounding the MTSF. • The latest 2025 reports show decreased dust fallout at the closest residents (a local homestead and contractor's camp), to the northwest and southwest of the TSF (compared to residential standards), as well as a decrease at the non-residential buckets to the east and west of the MTSF. • A significant increase in DFO was recorded at dust bucket S5 (at the most northern end of the MTSF adjacent to the main access road), in Mar and Apr 2025, compared to the seasonal averages, as well as dust bucket S9 south of the MTSF (Mar 2025) and S12 (west of the TSF) in Apr 2025; all dust buckets surrounding the TSF were however compliant with the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) National Dust Control Regulations No. R. 827 promulgated as of 1 May 2013 (NEMA Reg No. 827, 2013).	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Photo 26 - MTSF DFO monitoring locations	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
157	C57	• Fines (cement spills and dried sludge) will be collected at regular intervals so as not to contribute to excessively dusty conditions.	• No evidence was provided on the collection of fines. • A significant dust plume was observed on the MTSF during the audit.	• Photo 24 - Mareesburg TSF dust plume	
158		• Dust control measures (which may also include spraying of water) will be sufficient to ensure that dust will not have significant impacts in terms of the biophysical and social environments. These impacts include visual pollution, decreased safety due to reduced visibility, health aspects and ecological impacts due to dust particle accumulation in the watercourses and on vegetation.	• A significant dust plume was observed on the MTSF during the audit. • The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression on the MTSF. • This condition is rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Photo 24 - Mareesburg TSF dust plume • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	
159		• Vehicle speeds on any gravel or earth roads will be limited to 40 kph.	• The TMPs for the MTSF shows a 20 km/h speed limit for load and hauling during bench construction. • The SS TMP specifies the following speed limits: o Haul roads: 40 km/h o Down ramps (20 km/h) o Workshop/hard parks (10 km/h) o Corridor (40 km/h) o Site office area (20 km/h).	• Mareesburg TSF TMP (Load and Hauling), Fraser Alexander (03/12/24) • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	
160		• Movement of vehicles on site will be restricted.	• The SS TMP describes the allowable vehicles and access roads on site, as well as security access gates.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	
161		• Dust suppression will be undertaken of the service roads and TSF where required.	• A significant dust plume was observed on the TSF during the audit. • The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression on the MTSF. • This condition is rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Photo 24 - Mareesburg TSF dust plume • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	
162		• Only the immediate footprint of the area will be cleared of vegetation.	• Only the demarcated footprint was cleared.	• Site audit observations and interviews (26/06/25) • Technical Note: Mareesburg TSF: Nursery Assessment, Agreenco (11/03/19)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Increase in nuisance dust		
163	**C58 (refer to C12)**	• Undertake dust suppression where feasible on stockpiles and materials handling activities.	• A significant dust plume was observed on the TSF during the audit. • The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression on the MTSF or soil stockpiles. • These conditions are rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Photo 24 - Mareesburg TSF dust plume • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	
164		• Undertake dust suppression or chemical stabilization of unpaved roads.			
165		• Haul trucks to be restricted to specified haul roads.	• The TMP map depicts the specific access roads for loading and hauling.	• Mareesburg TSF TMP (Load and Hauling), Fraser Alexander (03/12/24) • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	
166		• Speed limit on unpaved roads not to exceed 40 km/hr.	• The TMPs for the MTSF shows a 20 km/h speed limit for load and hauling during bench construction. • The SS TMP specifies the following speed limits: o Haul roads: 40 km/h o Down ramps (20 km/h) o Workshop/hard parks (10 km/h) o Corridor (40 km/h) o Site office area (20 km/h).	• Mareesburg TSF TMP (Load and Hauling), Fraser Alexander (03/12/24) • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	
			Noise		
			Increase in ambient noise levels to surrounding communities (Leshaba family) as a result of construction activities		
167	**C59**	• Machinery and vehicle silencer units will be maintained in good working order. Non-compliant machinery and/or vehicles will be removed from service until repaired.	• Vehicles and equipment are maintained at the SS workshop at the contactor's yard, in line with the OEM schedule.	• Photo 23 - SS workshop	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
168	C59	• Should community complaints be received with regard to noise generation, mine management will, at the discretion of the ECO, investigate this, model the noise against the baseline information obtained during the specialist survey and implement appropriate measures. Possible best practice management measures regarding noise mitigation include: o Construction activities will be confined to daylight hours. o A noise monitoring programme will be implemented prior to construction. o Construction vehicles will be serviced at regular intervals to minimise noise generation.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates. • Construction hours are during daytime only: o Mon-Fri: 07:00 -17:00 o Sat: 07:00 - 12:00 • The latest annual noise monitoring report recorded daytime noise measurements at the TSF boundary (DN-TSF-1) of 50.4 dBA during the Sep 2024 survey (below the SANS 10103:2008 industrial limit of 70 dBA); and 39.4 dBA during the day and 33.5 dBA at night, at the closest noise sensitive receptor (DN-NSR-1) 150 m south of the TSF (both below the respective SANS 10103:2008 residential limits of 55 dBA and 45 dBA). • Vehicles and equipment are serviced in line with the OEM schedule.	• Mototolo Complex Grievance Register, 2025 • Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24) • Photo 27 - Mareesburg TSF noise monitoring locations	☑
Cultural Heritage					
Disturbance or destruction of historical and cultural sites					
169	C60	• Cemeteries near infrastructure will be fenced to ensure their protection.	• The 2021 EMPr shows the following cemetery, located northwest of the MTSF footprint, with the 2012 specialist Heritage Report by Archaeological Resources Management (ARM) stating: o *'AA89: Cemetery with 5 graves, three with headstones. High Social Importance. Recommended Mitigation: Grave Removal.'* • The RPM Cultural Heritage Specialist confirmed that site AA89 is captured in the Mototolo Cultural Heritage Management Plan (CHMP) and online GIS-viewer, which informs all planning and designs, and includes a 100 m stand-off; the site is not currently within any development footprints, but will be monitored.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012) • Der Brochen-Mototolo EMPr Audit Cultural Heritage Findings, Johan Nel (17/11/25)	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
170	C60	• Heritage sites within the footprint area rated low to high significance, require a permit from SAHRA for the demolition thereof.	• The EMPr shows seven heritage sites within the MTSF and services corridor footprints, two of which were rated as high and medium significance, with the 2012 HIA stating: o *'Site AA92, well-preserved household of African tenants with terrace lines, house remains, grindstones and midden. Leolo pottery underneath. High importance. Recommended Mitigation: Test excavation.'* o *'Site AA95, scatter of small slag pieces in road upslope of Site AA94. Medium importance.'* • The RPM Cultural Heritage Specialist confirmed that test excavation of Site AA92 was undertaken under 2018 SAHRA permit 2756 (De Jager, 2022). • The Huffman & Schoeman, 2002 HIA states that better representative Iron Age sites were identified nearby Site AA95, which was of no significance; no mitigation was recommended in either the 2002 or 2012 HIAs.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012) • Der Brochen-Mototolo EMPr Audit Cultural Heritage Findings, Johan Nel (17/11/25)	☑
171		• Graves identified within the footprint area will be exhumed and relocated, following the mandated procedure by a qualified Archaeologist.	• The 2021 EMPr shows the following graves identified by ARM in 2012 on the footprint of the MTSF: o '*AA18: Cemetery with three graves - within footprint. High social importance. Recommended Mitigation: Grave Removal*.' Listed as relocated in the 2021 EMPr. • The Stakeholder Engagement Plan (SEP) furthermore describes the involvement of the Moletsi Next of Kins (NOKs) Development Trust, consisting of the Mankge, Mosehla and Magahle families, whose 5 family graves were relocated in 2018 to make way for the construction of the MTSF.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Mototolo Complex Stakeholder Engagement Plan 2024/2025 (MOTC-ALL-SER-PLAN-0008)	☑
172		• The necessary permits for grave relocation will be obtained from SAHRA.			☑
173		• Undertake a Phase 2 Heritage Impact Assessment to further assess heritage sites identified during the impact assessment.	• The 2021 EMPr shows that various archaeological sites were identified on and around the MTSF footprint, by ARM in 2012. • The RPM Cultural Heritage Specialist confirmed that test excavation of Site AA92 was undertaken under 2018 SAHRA permit 2756 (De Jager, 2022).	• Post site audit clarifications • Der Brochen-Mototolo EMPr Audit Cultural Heritage Findings, Johan Nel (17/11/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Visual					
Decrease in visual aesthetics of the area					
174	C61	• Minimise vegetation clearing to the demarcated footprint area of the Mareesburg TSF.	• 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.	• Post site audit clarifications	✓
175		• The Tailings Dam has been placed in a position against a hill where it will not stand out from the surrounding topography and be less noticeable than other potential sites. The starter wall will be covered with a soil layer and will be re-vegetated early in the Operational Phase.	• Phase 1 embankment of the MTSF was rehabilitated, including hydroseeding.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment	✓
Traffic and Transportation					
Increased generation of traffic on existing road networks during construction					
176	C62 (refer to C16)	• Traffic conditions to be monitored annually, should traffic congestion increase, appropriate mitigation measures will be explored and implemented.	• The various TMPs do not refer to the monitoring of traffic conditions, or mitigation measures.	• No evidence was provided of traffic assessments.	✗
Impact on pedestrians and cyclists					
177	C63 (refer to C17)	• Control access by cyclists and pedestrians to the site.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services. • The SS TMP describes the allowable vehicles and access roads on site, as well as security access gates.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	✓
Impact on road safety conditions					
178	C64 (refer to C18)	• Drivers of heavy construction vehicles should attend a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road.	• Equipment drivers obtain the applicable permits, licences and training to safely operate specific construction vehicles.	• Site interviews (26/06/25)	✓
Decreased condition of the road network					
179	C65 (refer to C19)	• Develop a standard operating procedure for mine drivers to identify and report on potholes and road edge breaks to the operations manager who in turn will report it to the relevant authorities.	• The 2024 external audit states that: '*A Road Safety Disciplinary Procedure has been developed and is currently in draft format. This has however not as yet been implemented as it is in draft format.*'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • No evidence was provided of this or another procedure regarding road conditions.	✗

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-6: Management measures in respect of the construction of the pipeline system associated with the Mareesburg TSF [Construction of the Mareesburg Pipelines (tailings delivery and return water)]					
Soils, Land Capability and Land Use					
Loss of soil resources as a result of sterilisation from Pipeline and road					
180	**C66**	• Place Pipelines on plinths to avoid compaction of soils.	• The SRK Civil design report states that: '*The pipelines will be supported on concrete support plinths along the services corridor*.' • The pipeline has been constructed on plinths.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Site audit observations (26/06/25) • Photo 28 - MTSF pipeline on plinths	☑
Contamination of soil resource					
181	**C67 (refer to C2)**	• Conduct daily equipment inspections to detect leaks which may lead to hydrocarbon spills.	• The SS SHE Rep/Safety Officer conduct daily site checks, which include leak and spill detection, whilst the drivers' daily checklist includes equipment leak detection.	• Site audit observations and interviews (26/06/25)	☑
182		• Regular maintenance of vehicles.	• Servicing of vehicles and equipment is done at the SS workshop at the contactor's yard, in line with the OEM schedule.	• Photo 23 - SS workshop	☑
183		• Placement of drip trays under vehicles when parked and during fuel transfer.	• Drip trays were observed under all parked equipment.	• Photos 15-16 - bunded, concreted refuelling areas and drip trays under parked equipment	☑
184	**C67 (refer to C2)**	• Undertake on-site bioremediation or remove contaminated soils and dispose of at a licensed hazardous waste storage facility.	• The Hydrocarbon Management Procedure states that waste skips/drums are to be available in the workshop area should contaminated soil 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 ZW2L facility*.'	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Biodiversity					
Removal and loss of vegetation communities with a High / Medium- High Significance including wetland/ephemeral systems					
185	**C68 (refer to C3)**	• The Open Pit footprint areas will be clearly marked to contain activities within the designated area.	• No evidence was provided on demarcation of the pipeline corridor prior to clearing.	• Site audit information review	☒
186		• Prior to construction, the areas surrounding each footprint area will be marked to prevent further destruction of the surrounding vegetation communities, specifically near the riparian areas. Protect surrounding sensitive areas.			☒
187		• Consideration will be given to the harvesting of vegetation (trees and medicinal plants) by stakeholders prior to final stripping of vegetation. Such a programme will be developed in consultation with stakeholders and access to the mine area will be controlled by RPM.	• No evidence is available that stakeholders were given access to harvest vegetation.	• Post site audit clarifications	☒
188		• Create biodiversity awareness with construction crew and Environmental Control Officer (ECO) on site through training sessions and the preparation of a Biodiversity Awareness Programme.	• The site Environmental Induction for all contractors and employees, includes a discussion on biodiversity, environmental authorisations and permits for relocating or destroying sensitive flora. • Biodiversity awareness forms part of the monthly Mototolo Mine Complex Environmental Talk Topics.	• Review of slides from the Mototolo Complex SHEQ Induction • Mototolo Complex: Environment: The importance of wetlands, Feb 2025	☑
189	**C68 (refer to C3)**	• Appoint a biodiversity specialist to identify CI species within the Open Pits footprint for potential relocation or to be grown in the onsite nursery for use during rehabilitation.	• Agreenco's 2022 Technical Note confirms that: '*no protected plant surveys were conducted before the construction of the pipeline*'. • Agreenco conducted a post-construction monitoring survey from 25-27 Jan 2022 along the MTSF pipeline corridor, and identified several specimens of four nationally and/or provincially protected plant species, concluding that it can be expected that individuals of these protected plant species were likely destroyed during the construction of the pipeline. They recommended that an off-set number of individuals be propagated in the Mareesburg Nursery, that can then be replanted in the rehabilitated areas - no evidence was provided on whether this action was implemented.	• Technical Note: Assessment of post-construction vegetation establishment in rehabilitated areas along the Mareesburg TSF Pipeline, Agreenco (25/02/22)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
190	C68 (refer to C3)	• All CI species identified within the footprint of the Open Pits that can successfully grow *ex situ* will be translocated and the necessary permits applied for.	• Agreenco's 2022 Technical Note confirms that: '*no protected plant surveys were conducted before the construction of the pipeline*'.	• Technical Note: Assessment of post-construction vegetation establishment in rehabilitated areas along the Mareesburg TSF Pipeline, Agreenco (25/02/22)	✗
191		• Establish an onsite nursery for the growing and storing of plants for use in rehabilitation, including *Vitex* species.	• The Mareesburg Nursery is run by the Mototolo Mine Complex Conservation Manager and specialists Agreenco, with the purpose of rescuing and cultivating floral TOPS for rehabilitation purposes. • There are *Vitex sp* grown in the nursery.	• Photo 2 - Mareesburg Nursery visited on 26/06/25 • It has been established through ongoing research that *Vitex obovata subsp. wilmsii* is only one of the preferred species for *D. sylvia – it is recommended that this condition in the EMPr be aligned to the latest Cicada research.*	✓
192		• The Cicada population will be monitored during the mining phases. The mine is participating in ongoing studies of the invertebrate fauna	• SAS undertook the annual Cicada assessment in Dec 2024, to determine the status and distribution within the Groot-Dwars River Valley and comparing that data to previous studies. • RPM is also consulting with Northam Platinum, who are conducting Cicada research at their adjacent Booysendal Mine.	• Annual *Dyticopycna sylvia* (*Pycna sylvia*) Assessment, SAS, Jan 2025	✓
		Increase in Alien invasive species			
193	C69 (refer to C4)	• Ensure excavation equipment entering the site is cleaned and free of any seed propagules (this includes soil imports into the area- certificates required from source).	• No evidence was provided of inspections of excavation equipment entering the site.	• No certificates provided.	✗
194		• An Alien Invasive Management Plan is required for all current and future operations.	• The Invasive and Alien Vegetation Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • The Agreenco SAL describes the IAP eradications at the MTSF, including the pipeline corridor.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Service Acceptance Letter: YEAR 2: 2nd Eradication - selective Alien and Invasive Plant Eradication: Anglo American Platinum: Mareesburg TSF, pipeline and Mototolo Concentrator, Agreenco (30/08/24)	✓
195		• Educate the Construction crew on the identification and eradication of the top 10 alien species found within the area. Create an induction programme at commencement of the project.	• All contractors and employees attend the Mototolo Mine Complex SHEQ Induction prior to commencing work on site. • Monthly Environmental Topics (*displayed on site and included in Toolbox Talks*), have included information on alien species.	• Review of slides from the Mototolo Complex SHEQ Induction	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Wetlands					
Impact on drainage line features and riparian areas on the Pipeline route					
196	**C70**	• Support structures for the Pipelines will, if possible, be placed outside of drainage line or riparian habitat.	• The pipeline corridor was designed to cross streams and rivers above the 1:100 year (24-hour) storm event floodlines. • The plinths and anchor blocks viewed during the audit, at the river/stream crossings, are placed outside of the drainage lines.	• Site audit observations (26/06/25) • Photo 19 - erosion protection where the pipeline crosses a drainage line • Photo 28 - MTSF pipeline on plinths	☑
197		• The crossing designs of any bridges will ensure that the creation of turbulent flow in the system is minimised in order to prevent downstream erosion.	• The SRK Civil design report states that: o *'Bridges and culverts have been designed where the access roads cross rivers or stormwater drainage lines.'* o *'Limited impedance of flow is anticipated at these crossings.'* o *'The crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure.'*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
198		• No support pillars will be constructed within the active channels.	• The pipeline corridor was designed to cross streams and rivers above the 1:100 year (24-hour) storm event floodlines. • The plinths and anchor blocks viewed during the audit, at the river/stream crossings, are placed outside of the drainage lines.	• Site audit observations (26/06/25) • Photo 19 - erosion protection where the pipeline crosses a drainage line • Photo 28 - MTSF pipeline on plinths	☑
199		• The Pipelines will be constructed as close as possible to existing or planned roads in order to minimise the need for maintenance personnel to access the Pipeline.	• The pipeline corridor includes the access road, which generally runs parallel to the duty and standby tailings delivery pipelines, the return water pipeline and the overhead electrical supply powerline.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface Water					
Deterioration of surface water quality due to erosion, spillages and accidental discharges at the Pipeline crossings					
200	**C71**	• Stormwater culverts at watercourse crossings will be designed and constructed to accommodate the 1:50 year storm event.	• The SRK Civil design report states that: o *'the services corridor has been designed to cross streams and rivers above the 1:100 year (24-hour) storm event floodlines'* o *'the river and stream crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure'* o *'the stormwater diversion berms will be built and sized for the PMF-storm event at closure; this will exceed the Regulation 704 requirement that stipulates that the diversion berm be sized for a 1:50 year storm event.'*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
201		• Areas disturbed by construction activities will be rehabilitated immediately on completion of construction of each area.	• Previously disturbed areas alongside the pipeline corridor were observed to be revegetated. • Agreenco's 2022 Technical Note states that a moderately good establishment and cover of grass species was observed in the rehabilitated areas indicating some level of success, but recommended fertilisation and reseeding in areas with bare patches and high erosion, including the various berms.	• Site audit observations (26/06/25) • Technical Note: Assessment of post-construction vegetation establishment in rehabilitated areas along the Mareesburg TSF Pipeline, Agreenco (25/02/22)	☑
202		• Erosion protection and energy dissipaters will be constructed at the crossings as applicable.	• Culverts and gabions were observed at the pipeline crossings over drainage lines. • The SRK Civil design report states that: o '*the river and stream crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure.*'	• Site audit observations (26/06/25) • Photo 19 - erosion protection where the pipeline crosses a drainage line • Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
203		• Contractors will 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 Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
204	C71	• Emergency action plans will 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)	☑
205		• Chemical toilets will be provided at construction sites.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Photo 20 - chemical toilets at the TSF construction site	☑
Air Quality					
Increase in nuisance dust					
206	C72 (refer to C12)	• Undertake dust suppression where feasible on stockpiles and materials handling activities.	• The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression along the services corridor or soil stockpiles. • These conditions are rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	ℹ
207		• Undertake dust suppression or chemical stabilization of unpaved roads.			ℹ
208		• Haul trucks to be restricted to specified haul roads.	• The TMP map depicts the specific access roads for loading and hauling.	• Mareesburg TSF TMP (Load and Hauling), Fraser Alexander (03/12/24) • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
209	C72	• Speed limit on unpaved roads not to exceed 40 km/hr.	• The TMPs for the MTSF shows a 20 km/h speed limit for load and hauling during bench construction. • The SS TMP specifies the following speed limits: o Haul roads: 40 km/h o Down ramps (20 km/h) o Workshop/hard parks (10 km/h) o Corridor (40 km/h) o Site office area (20 km/h).	• Mareesburg TSF TMP (Load and Hauling), Fraser Alexander (03/12/24) • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	☑
Noise					
Increase in ambient noise levels					
210	C73 (refer to C13)	• Construction activities will be confined to daylight hours.	• Construction hours are during daytime only: o Mon-Fri: 07:00 -17:00 o Sat: 07:00 - 12:00.	• Site audit and interviews (26/06/25)	☑
211		• Construction vehicles will be serviced at regular intervals to minimise noise generation.	• Vehicles and equipment are serviced in line with the OEM schedule.	• Site audit and interviews (26/06/25)	☑
212		• The contractors/RPM will respond to public complaints about noise.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• Mototolo Complex Grievance Register, 2025	☑
Cultural Heritage					
Impact on cultural heritage sites					
213	C74 (refer to C60)	• Cemeteries near infrastructure will be fenced to ensure their protection.	• As explained in condition C60, a cemetery (AA89) with 5 graves, three with headstones, of high social importance, was identified by ARM in 2012, west of the MTSF and southwest of the services corridor. • The RPM Cultural Heritage Specialist confirmed that site AA89 is captured in the Mototolo Cultural Heritage Management Plan (CHMP) and online GIS-viewer, which informs all planning and designs, and includes a 100 m stand-off; the site is not currently within any development footprints, but will be monitored.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012) • Der Brochen-Mototolo EMPr Audit Cultural Heritage Findings, Johan Nel (17/11/25)	ⓘ
214		• Heritage sites within the footprint area rated low to high significance, require a permit from SAHRA for the demolition thereof.	• Archaeological sites of low-medium importance were identified along the services corridor by ARM in 2012, but the specialist Heritage Report did not recommend any mitigation for these sites, due to their lack of importance.	• Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012)	N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
215	C74 (refer to C60)	• Graves identified within the footprint area will be exhumed and relocated, following the mandated procedure by a qualified Archaeologist.	• No graves with identified within the footprint of the services corridor.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012)	N/A
216		• The necessary permits for grave relocation will be obtained from SAHRA.			N/A
217		• Undertake a Phase 2 Heritage Impact Assessment to further assess heritage sites identified during the impact assessment.	• Archaeological sites of low-medium importance were identified along the services corridor by ARM in 2012, but the specialist Heritage Report did not recommend any mitigation for these sites, due to their lack of importance.	• Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012)	N/A
Traffic and Transportation					
Increased generation of traffic on existing road networks during construction					
218	C75 (refer to C16)	• Traffic conditions to be monitored annually, should traffic congestion increase, appropriate mitigation measures will be explored and implemented.	• The various TMPs do not refer to the monitoring of traffic conditions, or mitigation measures.	• No evidence was provided of traffic assessments.	✗
Impact on pedestrians and cyclists					
219	C76 (refer to C17)	• Control access by cyclists and pedestrians to the site.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services. • The SS TMP describes the allowable vehicles and access roads on site, as well as security access gates.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	✓
Impact on road safety conditions					
220	C77 (refer to C18)	• Drivers of heavy construction vehicles should attend a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road.	• Equipment drivers obtain the applicable permits, licences and training to safely operate specific construction vehicles.	• Site interviews (26/06/25)	✓
Decreased condition of the road network					
221	C78 (refer to C19)	• Develop a standard operating procedure for mine drivers to identify and report on potholes and road edge breaks to the operations manager who in turn will report it to the relevant authorities.	• The 2024 external audit states that: '*A Road Safety Disciplinary Procedure has been developed and is currently in draft format. This has however not as yet been implemented as it is in draft format.*'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • No evidence was provided of this or another procedure regarding road conditions.	✗

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-7: Management measures Management measures in respect of the relocation of the 132kV powerline (Removal of existing 132kV Powerline Route and Construction of the Powerline on the proposed new route)					
Soils, Land Capability and Land Use					
Impact on soil resources					
222	**C79**	• Topsoil will be stockpiled separately and spread around the foundation at completion of construction to facilitate natural revegetation processes.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
223		• Backfilled material will be compacted to limit the possibility of erosion.			
Biodiversity					
Loss of vegetation along the re-routed Powerline route					
224	**C80**	• Ensure erecting of poles remains out of any wetland/ riparian areas.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
225		• Limit access to pole positions through existing road networks.			
226		• Remove and replant any CI species within the direct footprint of the pole.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
Increase in Alien invasive species					
227	**C81 (refer to C4)**	• Ensure excavation equipment entering the site is cleaned and free of any seed propagules (this includes soil imports into the area- certificates required from source).	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
228		• An Alien Invasive Management Plan is required for all current and future operations.			
229		• Educate the Construction crew on the identification and eradication of the top 10 alien species found within the area. Create an induction programme at commencement of the project.			

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Wetlands					
Impact on riparian habitats due to demolition and construction activities					
230	**C82**	• All waste resulting from the demolition of the existing Powerline will be removed from site and disposed of at a Licensed Waste Disposal Facility.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
231		• Inspect all adjacent drainage lines/ riparian habitats on both the former and new routes for sedimentation on a regular basis.			
232		• Ensure that support structures for the new Powerline poles are not placed within drainage line areas and their associated buffers.			
233		• Re-profile topsoil and revegetate disturbed areas once demolition is complete.			
Surface Water					
Increase in erosion from areas of exposed soils exacerbated by increased runoff volume and velocity from soil compacted areas					
234	**C83**	• Areas disturbed by demolition and construction activities will be rehabilitated immediately on completion in each area.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
235		• Areas disturbed by linear infrastructure will be rehabilitated progressively as construction progresses.			
Air Quality					
Increase in nuisance dust					
236	**C84 (refer to C12)**	• Undertake dust suppression where feasible on stockpiles and materials handling activities.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
237		• Undertake dust suppression or chemical stabilization of unpaved roads.			
238		• Haul trucks to be restricted to specified haul roads.			
239		• Speed limit on unpaved roads not to exceed 40 km/hr.			

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Noise					
Increase in ambient noise levels					
240	**C85 (refer to C13)**	• Construction activities will be confined to daylight hours.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
241		• Construction vehicles will be serviced at regular intervals to minimise noise generation.			
242		• The contractors/RPM will respond to public complaints about noise.			
Cultural Heritage					
Disturbance or destruction of historical and cultural sites					
243	**C86**	• Graveyards near infrastructure will be fenced to ensure their protection.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
244		• Poles will not be spaced closer than 30 m from graves to ensure that they are not disturbed. Graves beneath or within 30 m of powerlines will be fenced to ensure their protection.			
245		• The necessary permits for grave relocation will be obtained from the South African Heritage Resources Agency (SAHRA) should grave relocation be required.			
246		• Heritage sites that were rated low to high require a permit from SAHRA for the demolition thereof, if required.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	
247		• Undertake a Phase 2 Heritage Impact Assessment to further assess heritage sites identified during the impact assessment.			
Visual					
Impact on the visual aesthetics of the area					
248	**C87**	• Ensure that the servitude area is maintained and kept neat by clearing the area on a regular basis.	• Installation of the powerline has been delayed until Nov 2025.	• Post site audit clarifications	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-8: Management measures in relation to social aspects to be implemented during construction phase (Socio-economic impacts envisaged during construction in general)					
Socio-economic					
Contribution to the local and regional economy					
249	**C88**	• The mine has developed a SLP which will guide the operation on social issues. This is updated every five years.	• The SEP states that implementation of the current SLP 3 (2021-2025) was planned for conclusion at the end of 2025. As a result of the business's current cost reduction initiatives, some SLP 3 projects will be deferred until 2027. SLP 4 (2026-2030) engagements with external stakeholders are underway.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008) • Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited	☑
250		• The mine will inject investment into the local and regional economy through the employment of labour, use of local support services and the use of local infrastructure. The mine will strive to direct a much as possible to the local economy. Since it is unlikely that suppliers from within the study area (local level) will be suitable, goods should be preferentially procured in the immediate focus area and, if unsuccessful, only then in the broader focus area.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to Local Economic Development (LED), showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
251		• AAP will inform businesses through appropriate business fora about available opportunities and how business may access these. For example, the Steelpoort Business Forum will be used to engage with businesses in the local and regional areas.	• The SEP describes the process of consolidating recruitment forums into clusters, by the Social Performance (SP) team, with clustered forums from both Fetakgomo Tubatse and Thaba Chweu Local Municipalities (FTLM and TCLM), being engaged.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
252		• The revised SLP should reflect the targets for procuring goods locally and regionally, and to develop local suppliers. Contractors will be required to submit annual reports on how they are attaining these targets as part of AAP's SLP reporting to Government.	• The revised SLP 4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	ⓘ
253		• AAP will identify potential service providers for longer term procurement. Anglo Zimele can assist Broad Based Black Economic Empowerment (BBBEE) businesses (who meet their requirements) with funding and these businesses will be provided with ongoing support.	• The 2025 SLP Implementation tracker lists Zimele as responsible for supplier development (including company assessments and training of local suppliers), enterprise development and youth development. • Another spreadsheet tracks procurement figures, including BBBEE companies, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
254	**C88**	• Develop a social strategy, once mining has commenced, in line with the life of mine plan to assist in leaving a positive legacy. These strategies will be reviewed and monitored for implementation.	• The SEP describes the Local Accountability Strategy (LAS) in support of this SEP, which is aimed at capturing all Accountability Mechanisms that will be used to engage and inform external stakeholders. It furthermore describes the implementation, monitoring and evaluation of all engagement activities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
Contribution to national economic growth					
255	**C89**	• The mine will inject investment into the local and regional economy through the employment of labour, use of local support services and the use of local infrastructure. The mine will strive to direct as much as possible to the local economy. Since it is unlikely that suppliers from within the study area (local level) will be suitable, goods should be preferentially procured in the immediate focus area and, if unsuccessful, only then in the broader focus area.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
256		• AAP will inform businesses through appropriate business fora about available opportunities and how business may access these. For example, the Steelpoort Business Forum can be used to engage with businesses in the local and regional areas.	• The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
257		• The revised SLP should reflect the targets for procuring goods locally and regionally, and to develop local suppliers. Contractors will be required to submit annual reports on how they are attaining these targets as part of AAP's SLP reporting to Government.	• The revised SLP 4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	ⓘ
258		• AAP will identify potential service providers for longer term procurement. Anglo Zimele can assist BBBEE businesses (who meet their requirements) with funding and these businesses will be provided with ongoing support.	• The 2025 SLP Implementation tracker lists Zimele as responsible for supplier development (including company assessments and training of local suppliers), enterprise development and youth development. • Another spreadsheet tracks procurement figures, including BBBEE companies, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
259	**C89**	• Develop a social strategy, once mining has commenced, in line with the life of mine plan to assist in leaving a positive legacy. These strategies will be reviewed and monitored for implementation.	• The SEP describes the LAS in support of this SEP, which is aimed at capturing all Accountability Mechanisms that will be used to engage and inform external stakeholders. It furthermore describes the implementation, monitoring and evaluation of all engagement activities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
			Social disruption		
260	**C90**	• The mine will implement management commitments with respect to noise, dust, safety, blasting and vibrations and other activities.	• Mototolo Mine Complex conducts the following monitoring: o air quality: monthly dust fallout monitoring o biomonitoring: bi-annual (summer and winter) aquatic and toxicological assessments of the Groot Dwars River and Mareesburg Stream o noise: annual noise monitoring on site and at the closest sensitive receptors o safety: annual Dam Safety Inspection (DSI) Report for HTSF and MTSF o water quality: monthly surface water and groundwater quality sampling, monthly static groundwater level determinations and monthly weir flow determinations.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Mar 2025) • Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Oct 2024) • Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24) • 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024) • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25)	☑
261		• The mine should consult with CPAs and tribal authorities to discuss possibilities of the influx of people into the area.	• The SEP describes stakeholder communications with the Communal Property Associations (CPAs) of the directly and indirectly affected communities, as well as the various traditional authorities (TAs) in the FTLM and Makhuduthamaga Local Municipality (MLM)	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
262		• Implementation of an HIV/AIDS awareness campaign targeting construction workers, employees and surrounding communities.	• 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.	• Platinum Health pamphlet: Adjusting to Life with HIV • Platinum Health pamphlet: How to navigate your relationship	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
263	C90	• Contractors will be required to find their own accommodation. The mine will provide appropriate policies and procedures with regards to employee accommodation and related transport assistance. Construction contractors will not be housed on site.	• The SLP 3 describes their commitment for their Housing and living conditions to meet the requirements of Regulation 46c (i) of the revised Housing and Living Conditions Standard for the Minerals Industry (published in the Government Gazette on 11 Dec 2019), providing either a Living out allowances (LOA) or Single accommodation villages. • There is no contractor accommodation on site.	• Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited	☑
264		• If incidences of squatting as result of mine development are encountered, the mine will report this to the relevant authorities. Since no permanent housing will be provided on site, the option for some non-locals may simply be to make their own arrangements as close as possible to the workplace.	• No incidences of squatting were observed during the audit. • The Mototolo Mine Complex SP Team is aware of this condition.	• Site audit and interviews (24-26/06/25)	☑
265		• All construction sites will be fenced where necessary to prevent public access and access by game. No loitering by employees outside the designated working hours will be allowed in the vicinity of the mining areas and mine entrance. No employment at the gate will be allowed.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services. • All recruitment and employment are managed by the SP Team.	• Site audit and interviews (24-26/06/25)	☑
266		• No traversing or access to neighbouring properties by contractors' staff will be permitted.	• In addition to the perimeter fencing and main access control, there are various site specific (concentrator, TSFs, shafts) access roads with security gates, ensuring contractors are restricted to only the allowable areas the work in.	• Site audit and interviews (24-26/06/25)	☑
267		• Complaints from neighbours and the public with regard to interference from contractors' or mine staff will be promptly addressed and due process followed.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• Mototolo Complex Grievance Register, 2025	☑
268		• A community forum will be established whereby the mine, its contractors and local residents communicate on a regular basis to ensure that the mine is in a position to attend to valid concerns of the local community in an appropriate manner.	• The SEP states the Community Engagement Forum (CEF) is planned, but not yet formally established nor functioning. • This condition is however rated as noted, as the SP Team attends various community forums, and implements a clear communication strategy as part of its LAS.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
269	C90	• No informal settlement on mine property will be permitted and illegal structures and their inhabitants will be removed in accordance with the law.	• No informal settlements were observed during the audit. • The Mototolo Mine Complex SP Team is aware of this condition.	• Site audit and interviews (24-26/06/25)	☑
270		• The site project management staff contractors will be required to comply with all security procedures as determined from time to time on the project. All employees will be issued with a security card and the contractor will be responsible for ensuring these cards are carried by employees at all times whilst on site and that employees are kept fully aware of the applicable security procedures.	• All contractors undergo the required inductions and access cards are issued for the relevant areas they are employed at.	• Site audit and interviews (24-26/06/25)	☑
271		• There will be no accommodation on site.	• There is no contractor accommodation on site.	• Site audit and interviews (24-26/06/25)	☑
Disturbance of the local community, social infrastructure and services					
272	C91	• Local communities will be prioritised for local employment to avoid increased pressure on local and subregional services and facilities, provided the skills and qualifications are available.	• The 2025 SLP Implementation tracker has a spreadsheet tracking procurement figures against the SLP 3 targets, including procurement from the host community and local suppliers. • The SLP 3 furthermore states that implementation of the SLP Projects will focus on the creation of local employment and contracting opportunities.	• Mototolo Mine Complex SLP Implementation Plan 2025 • Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited	☑
Generation of jobs					
273	C92	• It is expected that contractors will bring in their own workers with the required core skills. Contractors must submit annual reports on how they are attaining these targets as part of AAP's. Where it is not possible to meet targets for employing people from the immediately affected areas, contractors will be required to source personnel in the immediate focus area, and then only in the broader focus area. Potential workers in the local area will be assessed for their suitability for contract work at Der Brochen. Dover tests can be conducted to screen potential local contract workers.	• 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.	• RPM Mototolo Mine Contractor Recruitment Process	☑
274		• AAP will investigate the potential and applicability assisting with training of local contract workers on theoretical and safety aspects of pit mining.	• There is no open pit mining currently conducted at the Mototolo Mine Complex.	• Site audit and interviews (24-26/06/25)	N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
275	C92	• Should the mine be able to assist with training a database of trained potential local workers will be generated and provided to contractors to consider for employment. Local contract workers will be registered on the AAP database so that they may have access to other employment options in AAP and other companies AAP shares its database with.	• The 2025 SLP Implementation tracker details and tracks supplier development, which includes: o local supplier gap analysis o courses for local suppliers o supplier development partners o training of local suppliers o beneficiaries graduating from the bespoke support programme. • RPM maintains a supplier/vendor database.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
276		• AAP also provides learnerships and bursaries in engineering and hospitality and will implement this programme in the local communities. Upskilling particularly of contract workers from the local area will be undertaken by AAP during the operations phase of Der Brochen.	• The 2025 SLP Implementation tracker shows the number of learnerships and bursaries for employees, as well as the learnerships, cadet ships and bursaries for the local communities during 2021-2025. • Contractor upskilling will be tracked once the Der Brochen Mine is operational.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
277		• Procedures for employing locals will be discussed and agreed with the Community Engagement Forum (CEF). Existing fora will be used to implement AAP's local recruitment process, to communicate the recruitment process and to identify and recruit suitable candidates.	• The RPM Mototolo Mine Contractor Recruitment Process outlines their local recruitment process. • The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• RPM Mototolo Mine Contractor Recruitment Process • Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
278		• AAP will meet the SLP requirements and commitments for downscaling and retrenchments, including the establishment, implementation and monitoring of a Future Forum.	• The 2025 SLP Implementation tracker states that: '*Future Forum has been established with the Constitution signed. With the P950 we have held session with labour representatives. Any decision for downscaling will be announced by Corporate and lead with assistance of the Corporate ER team. Operation will only facilitate operation task teams as each business has its own operation design. Budget and allocated funding are dependent on the scale of downscaling. Budget for portable skills will be dependent on agreement with labour representatives*.'	• Mototolo Mine Complex SLP Implementation Plan 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Procurement of goods and services		
279	**C93**	• The mine will inject investment into the local and regional economy through the employment of labour, use of local support services and the use of local infrastructure. The mine will strive to direct as much as possible to the local economy. Since it is unlikely that suppliers from within the study area (local level) will be suitable, goods should be preferentially procured in the immediate focus area and, if unsuccessful, only then in the broader focus area.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	
280		• AAP will inform businesses through appropriate business fora about available opportunities and how business may access these. For example the Steelpoort Business Forum and Tubatse Business Forum will be used to engage with businesses in the local and regional areas.	• The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	
281		• The revised SLP should reflect the targets for procuring goods locally and regionally, and to develop local suppliers. Contractors will be required to submit annual reports on how they are attaining these targets as part of AAP's SLP.	• The revised SLP4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	
282		• AAP will identify potential service providers for longer term procurement Anglo Zimele can assist BEE businesses (who meet their requirements) with funding and these businesses will be provided with ongoing support.	• The 2025 SLP Implementation tracker lists Zimele as responsible for supplier development (including company assessments and training of local suppliers), enterprise development and youth development. • Another spreadsheet tracks procurement figures, including BBBEE companies, against the SLP targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	
283		• Develop a social strategy, once mining has commenced, in line with the life of mine plan to assist in leaving a positive legacy This strategies will be reviewed and monitored for implementation.	• The SEP describes the LAS in support of this SEP, which is aimed at capturing all Accountability Mechanisms that will be used to engage and inform external stakeholders. It furthermore describes the implementation, monitoring and evaluation of all engagement activities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Influx of job seekers		
284	**C94**	• Enhance employment of people and procurement of service providers in the study area and the region.	• 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.	• RPM Mototolo Mine Contractor Recruitment Process	☑
285		• Accommodation should preferably be provided in towns in close proximity to the project area and workers bussed in.	• The SLP 3 describes their commitment for their Housing and living conditions to meet the requirements of Regulation 46c (i) of the revised Housing and Living Conditions Standard for the Minerals Industry (published in the Government Gazette on 11 December 2019), providing either a LOA or Single accommodation villages. • There is no contractor accommodation on site.	• Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited	☑
286		• Should accommodation be required in close proximity to the operation: o RPM should require the contractors to promote HIV/AIDS prevention amongst employees. o RPM and the contractors should work with the health authorities to provide HIV/AIDS prevention and treatment interventions in a culturally appropriate manner. AAP will confirm if this is possible. o Sub-contractors should adhere to the contract with the contractor. o A strategy and protocol for camp management should be developed and implemented, should an existing worker accommodation facility be used.	• All contractors are responsible for arranging their own accommodation.	• Site audit observations and interviews (24-26/06/25)	N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Impacts on medicinal plants during land clearing activities during the Construction Phase					
287	**C95**	• A land access protocol for visiting graves is currently in place and AAP Land Use management will explore the possibility of extending this protocol for enabling the collection of medicinal plants on the property where areas are to be disturbed.	• Medicinal plants were rescued from the MTSF Phase 1 footprint in 2017 and relocated to the Mareesburg Nursery. • No evidence has however been provided of community access to medicinal plants prior to clearing of the current construction areas, namely the DB North footprint and the MTSF Phase 4 footprints.	• Findings and Recommendations regarding the relocation of plant species from Mareesburg Farm, Der Brochen after a site visit at the start of the plant removal process, ERC (19/07/17)	
288		• A complaints register will be kept and issues raised will be investigated, and a grievance procedure will be developed and implemented.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• Mototolo Complex Grievance Register, 2025	

Table 3: Der Brochen-Mototolo Mine Complex Amended EMPr (May, 2021) Compliance Audit Results - Operational Activities

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-10: Management measures in respect of operation of the Co-Disposal Facility					
Topography					
Permanent alteration of topography due to the Co-Disposal Facility					
289	**O23**	• On closure, the Co-Disposal Facility will be shaped to be free draining. Erosion protection will be provided. o The Co-Disposal Facility will be revegetated to blend into the natural environment.	• The 2019 Der Brochen EMPr lists closure actions of the WRD embankment facility (*previously authorised for the co-disposal facility*), including backfilling and vegetation establishment. • The latest 2024 Closure Plan states: o '*Rip and shape all other footprint area to be free-draining*' o '*Ameliorate soils based on dedicated soil fertility sampling and establish vegetation by applying suitable seed mix*'.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov 2019) • Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
Soils, Land Capability and Land Use					
No additional impacts are envisaged during the Operational Phase, when tailings will be deposited as topsoil would have been removed and stockpiled in the Construction Phase. Management measures for stockpiling should take place.					
290	**O24 (refer to O3)**	• Soil for the purpose of rehabilitation that has been stripped from cleared areas during the Construction Phase will be stockpiled. The following conservation principles will apply: o Stripped soil will be stored with as little compaction as possible; o Stockpile areas will have their soil stripped to conserve the seed bank; o Single handing will be practiced where possible; o Stockpiles that are likely to remain undisturbed for 12 months or more will be revegetated; and o Usable soil will be respread with as little compaction as possible.	• The Topsoil Method Statement includes the construction sequence and method for soil stripping and stockpiling in the designated area. • Soils were stripped from the WRD embankment/DB North footprint (*previously authorised for the co-disposal facility)* and stockpiled, prior to construction commencing in Apr 2022. • The stockpiles are continuously being developed and used in concurrent rehabilitation, as the Mine is under construction, and are consequently not being vegetated.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21) • Post site audit clarifications	
291		• Land to which soil has been applied will be revegetated.	• Areas handed over by the construction team will be rehabilitated and revegetated as soon as construction ceases.	• Post site audit clarifications	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Biodiversity					
No additional impacts are envisaged during the Operational Phase, when tailings will be deposited as vegetation would have been cleared during the Construction Phase. However, the surrounding natural area should not be further impacted upon. Management measures for the surrounding natural area should be implemented.					
292	**O25 (refer to O4)**	• Continuous education of staff - both permanent, and contractors is required on the importance of biodiversity in the region and why it will be conserved.	• The site Environmental Induction for all contractors and employees, includes a discussion on biodiversity, environmental authorisations and permits for relocating or destroying sensitive flora. • Biodiversity awareness forms part of the monthly Mototolo Mine Complex Environmental Talk Topics.	• Review of slides from the Mototolo Complex SHEQ Induction • Mototolo Complex: Environment: The importance of wetlands, Feb 2025	☑
293		• Dust suppression on the roads will be undertaken when required.	• The Topsoil Method Statement states that: o '*Construction haul roads will be created around the topsoil stockpile work area and haul roads that lead to the designated stockpile area; this haul road will be kept moist to avoid dust*'. o '*A water cart will spray the haul roads*'.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	☑
294		• No off road driving permitted.	• The Topsoil Method Statement states: '*Haul road leading to the topsoil stockpile will be equipped with sufficient signage and or flag persons to direct haul traffic accordingly*'.		☑
295		• Long term monitoring of the Groot-Dwars River is required both in terms of habitat/community structural changes as well as bio-monitoring of the system.	• SAS undertakes bi-annual (summer and winter) aquatic and toxicological assessments of the Groot Dwars River and Mareesburg Stream, which includes: o water quality in the Groot Dwars River and Mareesburg Stream o habitat integrity of the biomonitoring sites o habitat suitability for micro-invertebrates o integrity of the aquatic macro-invertebrate community o taxological testing of the process water system and receiving environment.	• Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Mar 2025) • Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Oct 2024)	☑
296		• Ensure the Alien and Invasive Management Plan and Biodiversity Action Plan is continuously updated.	• The Invasive and Alien Vegetation Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • The WRD embankment/DB North footprint is however not currently included in Agreenco's scope of work for IAP eradication, but will be added in future.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Wetlands					
No additional impacts expected after the Construction Phase. However, the surrounding natural area should not be further impacted upon. Management measures for the surrounding natural area should be implemented.					
297	**O26**	• Clear separation of clean and dirty water will take place and diversion of clean water around the operational areas will ensure minimisation of the loss of catchment yield.	• A berm was constructed around the stockpile area, with runoff diverted via a concrete trench to the northern ore stockpile PCD and generated dirty water is pumped to the same PCD for reuse.	• Post site audit clarifications • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
Surface Water					
Deterioration in water quality in the Dwars River due to inadvertent release of tailings, return water or leachate to the natural environment.					
298	**O27**	• Routine inspections and maintenance will be conducted on all TSF infrastructure including Pipeline routes and crossings.	• This section refers to the WRD embankment/DB North footprint (*previously authorised for the co-disposal facility*) and not the TSF and pipelines.	• EMPr error to be corrected	N/A
299		• Surface water quality, and quantity, monitoring systems will be established for the open pit and Co-Disposal Facility.	• GCS conducts monthly surface water sampling at: o 4 monitoring localities on the Groot Dwars River o these sampling points are location northeast of the WRD embankment/DB North footprint.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25)	☑
300		• Emergency action plans will 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)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Groundwater					
Contaminant plume migration (deterioration of groundwater and surface water quality)					
301	**O28**	• Install a lining system of either composite clay or HDPE as stipulated in the WUL.	• The 2019 EMPr and 2021 WUL both authorise the WRD embankment facility with HDPE lined containment dams for the storage of water. • The WRD embankment has been created along the northern boundary from imported waste rock, and the footprint is being used for stockpiling, crushing and screening of material excavated from the Der Brochen South Shaft terrace. • No containment dams have been constructed and thus no liners installed - liners will remain a legal requirements once dams are constructed. • The adjacent North Ore Stockpile PCD was lined with HDPE.	• Document review	
302		• Seepage collection drains will be installed to collect seepage.	• No seepage collection drains have been installed around the WRD embankment/DB North footprint.	• No evidence provided on water management infrastructure designs in the northern Der Brochen footprint	
303		• Rehabilitation and capping of the facility to reduce seepages after closure.	• These measures applied to the co-disposal facility; different decommissioning and closure measure are included in the 2019 EMPr for the WRD embankment/DB North footprint.	• Der Brochen Amendment Project EIAR and EMPr, SRK (Nov 2019)	
Air Quality					
Increase in nuisance dust during operations					
304	**O29 (refer to O11)**	• Regular water sprays preferably combined with chemicals on unpaved haul roads.	• The Topsoil Method Statement states that: o '*Construction haul roads will be created around the topsoil stockpile work area and haul roads that lead to the designated stockpile area; this haul road will be kept moist to avoid dust*'. o '*A water cart will spray the haul roads*'.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21)	
305		• Speed limit on haul roads not to exceed 40 km/hr.	• The Mototolo Mine Complex Traffic Management Procedure states: 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 Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	
Noise					
Increase in ambient noise levels					
306	**O30**	• No mitigation measures required due to the insignificant noise from the Co-Disposal Facility.	-	-	-

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Cultural Heritage					
No additional impacts are envisaged during the Operational Phase, however there are cultural heritage sites identified around the Open Pits area. Management measures should apply to these heritage sites.					
307	**O31**	• Fence heritage sites near infrastructure with a significance rating of low to high.	• No graves are currently affected on the WRD embankment/DB North footprint.	• Noted if the area west of the services corridor is developed in future	
308		• Where applicable, provide access to cemeteries and graves to families of the deceased.			
Visual					
Decrease in visual aesthetics of the area					
309	**O32**	• Vegetate Co-Disposal Facility walls to blend into the natural environment at closure.	• This condition is noted by the Mototolo Mine Complex.	• Post site audit clarifications	
Traffic and transportation					
Increased generation of traffic on existing road networks during operations					
310	**O33 (refer to O15)**	• Traffic conditions to be monitored annually, should traffic congestion increase, appropriate mitigation measures will need to be explored and implemented.	• The various TMPs do not refer to the monitoring of traffic conditions, or mitigation measures.	• No evidence was provided of traffic assessments	
Impact on pedestrians and cyclists					
311	**O34 (refer to O16)**	• Control access by cyclists and pedestrians to the site.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services.	• Site audit observations and interviews (24-26/06/25)	
Impact on road safety conditions					
312	**O35 (refer to O17)**	• Drivers of heavy Operation mining vehicles will attend a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road.	• Equipment drivers obtain the applicable permits, licences and training to safely operate specific construction vehicles.	• Site interviews (26/06/25)	
Decreased condition of the road network					
313	**O36 (refer to O18)**	• A standard operating procedure is developed for all mine drivers to identify and report potholes and edge breaks to the operations manager who in turn will report it to the relevant authorities.	• The 2024 external audit states that: '*A Road Safety Disciplinary Procedure has been developed and is currently in draft format. This has however not as yet been implemented as it is in draft format.*'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • No evidence was provided of this or another procedure regarding road conditions.	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-11: Management measures in respect of the Operation of the Mareesburg TSF and associated infrastructure and pipeline system					
Topography					
Changes in topography as a result of the Tailings Dam					
314	**O37**	• Rehabilitation and vegetation of tailings walls: o The outer slope of the Tailings Dam wall will be covered with soil and will be grassed. o On closure, the top surface of the Tailings Dam will be covered and grassed.	• The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and the MTSF walls will be ripped, graded, topsoiled and revegetated once handed over by the construction team. • Agreenco's 2019 Technical Note describes their assessment of the hydroseeding of the MTSF's embankment, which commenced on 25/02/2019. • Only the starter wall of the MTSF has been rehabilitated to date.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment	
Soils, Land Capability and Land Use					
Loss of soil resources in the area to be covered by the Tailings Dam					
315	**O38**	• A soil stripping, stockpiling and utilisation plan will be developed. Soil can be stripped sequentially ahead of areas being flooded such that the whole basin does not have to be stripped at the outset.	• The 2024 external audit refers to the findings in the 2022 external audit, prior to construction of the MTSF in Nov 2018, as follows: o *'A soil stripping plan was developed for construction activities at Mareesburg TSF. From a review of the plan: 'Mareesburg TSF - Soil Management Plan, dated October 2017' and prepared by SRK Consulting, the following soil stripping requirement is included: "The "Utilisable" soil will be stripped to a depth of 750 mm or until hard rock/calcretes and/or ferricrete is encountered. These soils will be stockpiled together with any remaining vegetation cover present. The total stripped depth should be 750 mm, wherever possible.'*	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • Photo 5 - topsoil stockpiles	
316		• Soil stripped will either be used immediately for rehabilitation of the outer slope of the wall or will be stockpiled for later use.	• Agreenco's 2019 Technical Note describes their assessment of the hydroseeding of the MTSF's embankment, which commenced on 25/02/2019.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment	
317		• Soil placed in stockpiles will not be compacted. It is anticipated that natural re-vegetation will provide an adequate cover to protect these stockpiles against erosion. In the event that this does not occur the areas will be seeded.	• The topsoil stockpiles did not appear to be compacted, with equipment driving only on a designated ramp up and down the stockpile area.	• Photo 5 - topsoil stockpiles	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
318	O38	• Soil stockpiles will be maintained in a weed free condition (i.e. no 'broadleafed' plants regarded as weeds or those plants regarded as a 'general nuisance' in the area, will be allowed to grow on the stockpiles). The ECO will provide guidance as to which plants are weeds and require removal.	• The Invasive and Alien Vegetation Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • The Agreenco SAL describes the IAP eradications at the MTSF.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Service Acceptance Letter: YEAR 2: 2nd Eradication - selective Alien and Invasive Plant Eradication: Anglo American Platinum: Mareesburg TSF, pipeline and Mototolo Concentrator, Agreenco (30/08/24)	
319		• During the Operational Phase, the outer slope of the Tailings Dam will be covered with a layer of soil concurrently with construction.	• Only the Phase 1 embankment of the MTSF was covered with topsoil and seeded; none of the other slopes have been rehabilitated.	• Site audit observations (26/06/25) • Photo 10 - revegetated Mareesburg TSF embankment	
320		• On closure, the top surface of the Tailings Dam will be covered with a layer of soil.	• This condition is noted by the Mototolo Mine Complex.	• Site audit and interviews (26/06/25)	
321		• Stripped soil not used for the starter wall and rehabilitation of the outer slope of the wall will be stockpiled for later use.	• Excess topsoil from stripping of the various phases of the MTSF's developed, was stockpiled for use in ongoing rehabilitation..	• Photo 5 - topsoil stockpiles	
Loss of soil resources due to erosion					
322	O39	• Erosion control measures will be implemented throughout the site for the entire life of the mine.	• The SRK Civil design reports states that erosion control measures were implemented during Phase 1 of the MTSF's development: o River crossings: '*sufficient erosion and scour protection measures'* o Drains: '*a thicker layer of drainage medium to cater for erosion and specifically the geofabric layer to protect the placed drainage materials from contamination erosion'.* o Northern and southern stormwater outlets: '*rock lens dissipator structures were designed and constructed during the Phase 1 construction works. They were installed to dissipate the concentrated stormwater flows*' and '*a spillway along the crest of the storm water channel to reduce flow velocities'.*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
	O39		• The Phase 4 design report however reported extensive erosion along the exposed excavated slopes of the stormwater channel and exposed areas within and around the MTSF, stating that '*it is envisaged that the erosion will significantly reduce once the hydroseeding programme, to the exposed surfaces, has been concluded and the vegetation established.'* It was decided to reconstruct larger rock lens walls. • Only the Phase 1 embankment was rehabilitated, including hydroseeding, with the remainder of the MTSF walls and surrounding disturbed areas remaining bare. • Several areas of erosion were noted at the MTSF during the audit, where construction has been completed, and have not been rehabilitated.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22) • Photo 10 - revegetated Mareesburg TSF embankment • Photo 6 - erosion along the northern stormwater channel • Photo 7 - erosion along the main access road due to a natural spring	
323		• Drainage facilities will be designed to minimise the potential for soil erosion.	• Various drainage facilities (underdrainage, solution drainage, stormwater drainage, over- and basal drainage) have been designed at the MTSF, including energy dissipators. • As stated above, SRK's Phase 4 design report includes the construction of larger rock lens walls as the current Northern and Southern Clean Stormwater Channel Rock Lens Dissipators were not sufficiently preventing erosion.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
324		• Energy dissipaters will be provided in areas where concentrated discharges could cause significant erosion, such as the Tailings Dam, return water dam and the access/service roads.	• The SRK Design Reports refer to the following energy dissipators: o RWD Pond 1: '*the emergency overflow spillway to Pond 1 spills into the environment via an energy dissipator structure*.' o Northern and Southern stormwater channels: '*rock lens dissipator structures to dissipate the concentrated stormwater flows reporting to the northern and southern stormwater outlets.'*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
325	**O39**	• All drainage facilities will be checked at approximately three monthly intervals during the rainy season and any undue erosion or siltation, especially at discharge points, will be noted and repaired. The operation will identify the cause of such undue erosion or siltation and suitable remedial measures will be implemented.	• The 2020 SRK design report recommends: '*Routine daily inspections by the operator to identify any erosion (especially following high rainfall), followed by approved repairs*.' and *'In general terms, routine visual site inspections would be a daily required surveillance activity and would involve documenting any adverse conditions developing on the facility, (such as seepage on slope faces, physical damage to infrastructure caused by erosion or other events).*' • The 2022 Phase 4 Designs report states: '*Maintenance and inspections of the extent of sedimentation to be conducted by the MTSF operational team to be conducted regularly*.'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
Soil contamination due to leaching of contaminants and seepage					
326	**O40**	• Water pollution management measures are designed to contain all polluted water, thereby minimising the potential for soil contamination from this source.	• SRK's Phase 4 design report states that runoff stormwater, generated from the TSF walls, will be contained in paddocks. • The report also states that temporary diversions channels are placed upgradient of developing RWD Ponds 3 and 4, to divert any excess stormwater runoff between the clean stormwater diversion and the tailings deposition area back to the environment, thereby limiting the need for dirty water storage at the RWD complex. • The supernatant and dirty stormwater are drained from the TSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
327		• Any spillage will be cleaned up and remediated.	• The Hydrocarbon Management Procedure details the actions required for the prevention and management of spills and leaks.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
328	O40	• Monitoring will be implemented downstream of all Pipeline watercourse crossings to detect any impacts.	• The 2020 SRK design report recommends: '*Routine daily inspections by the operator to identify any erosion (especially following high rainfall), followed by approved repairs*.' and *'In general terms, routine visual site inspections would be a daily required surveillance activity and would involve documenting any adverse conditions developing on the facility, (such as seepage on slope faces, physical damage to infrastructure caused by erosion or other events).*' • The 2022 Phase 4 Designs report states: '*Maintenance and inspections of the extent of sedimentation to be conducted by the MTSF operational team to be conducted regularly*.'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	✓
329		• A leak/spill detection plan will be devised and implemented for possible areas of leaks/spillage.	• The Hydrocarbon Management Procedure details the actions required for the prevention and management of spills and leaks.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	✓
330		• An inspection and maintenance plan will be implemented to ensure that the Tailings Storage Facility and Pipelines always operate within specifications.	• The 2024 Inspection Report includes a Conformance Table for the MTSF against the Pipeline Design and Material Specifications, comparing operational values against the design. • The report summarises the findings of the: o quarterly site and drone inspections of the TSF and RWDs o monthly inspections of the Vibrating Wire Piezometers (VWP) networks at MTSF to identify maintenance requirements o weekly assessment of the slope angles of the TSF by Fraser Alexander (FA).	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	✓
331		• Storm water containment will be implemented for the TSF as per the Stormwater Management Plan.	• SRK's Phase 4 design report includes a clean water separation berm along the Phase 4 Starter wall, to ensure that runoff stormwater, generated from the TSF walls, will be contained in paddocks.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	✓
332		• Continuous rehabilitation on tailings walls during operation.	• Only the Phase 1 embankment was rehabilitated, including hydroseeding. • Several areas of erosion were noted at the MTSF during the audit, where construction has been completed, and have not been rehabilitated.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment • Photo 6 - erosion along the northern stormwater channel • Photo 7 - erosion along the main access road due to a natural spring	✗

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Biodiversity					
Changes in community structure and population dynamics of floral species					
333	**O41**	• Continuous education of staff – both permanent staff, and contractors, is required to advise on the importance of biodiversity in the region and why it should be conserved.	• The site Environmental Induction for all contractors and employees, includes a discussion on biodiversity, environmental authorisations and permits for relocating or destroying sensitive flora. • Biodiversity awareness forms part of the monthly Mototolo Mine Complex Environmental Talk Topics.	• Review of slides from the Mototolo Complex SHEQ Induction • Mototolo Complex: Environment: The importance of wetlands, Feb 2025	☑
334		• Dust suppression on gravel roads and TSF will be undertaken when required.	• The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression along the services corridor or soil stockpiles. • This condition is rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	ⓘ
335		• No off road driving will be permitted.	• The TMP map depicts the specific access roads for loading and hauling.	• Mareesburg TSF TMP (Load and Hauling), Fraser Alexander (03/12/24) • Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25)	☑
336		• Long term monitoring of the Groot-Dwars River is required both in terms of habitat/community structural changes as well as bio-monitoring of the system.	• SAS undertakes bi-annual (summer and winter) aquatic and toxicological assessments of the Groot Dwars River and Mareesburg Stream, which includes: o water quality in the Groot Dwars River and Mareesburg Stream o habitat integrity of the biomonitoring sites o habitat suitability for micro-invertebrates o integrity of the aquatic macro-invertebrate community o taxological testing of the process water system and receiving environment.	• Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Mar 2025) • Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Oct 2024)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
337	O41	• Ensure the Alien and Invasive Management Plan and Biodiversity Action Plan is continuously updated and implemented.	• The Invasive and Alien Vegetation Procedure includes a section on the '*History of Changes*' showing the procedure is updated as required, as well as sections on who is responsible for review and implementation of the procedure. • The Agreenco SAL describes the IAP eradications at the MTSF. • The 2023 Der Brochen BAP, states it is an update of the 2021 BAP and existing biodiversity baseline and monitoring data.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (MOTC-SHE-ENV-PRO-0009) • Service Acceptance Letter: YEAR 2: 2nd Eradication - selective Alien and Invasive Plant Eradication: Anglo American Platinum: Mareesburg TSF, pipeline and Mototolo Concentrator, Agreenco (30/08/24) • Der Brochen Biodiversity Action Plan, SAS (Jan 2023)	
338		• Revegetate areas on the TSF as soon as possible. Rehabilitation will include indigenous species of the area. Collection of seed and storage of plants would have occurred prior to vegetation clearing in the Construction Phase.	• Only the Phase 1 embankment of the MTSF was rehabilitated, including hydroseeding. • Several areas of erosion were noted at the MTSF during the audit, where construction has been completed, and have not been rehabilitated. • ERC and Agreenco rescued various protected plant and tree species trees, as well as harvested root cuttings from the TSF footprint since 2017; relocations were either directly to a relocation area or to the Mareesburg Nursery.	• Mareesburg TSF: Assessment of Hydroseeding, Agreenco (08/03/19) • Photo 10 - revegetated Mareesburg TSF embankment • Photo 2 - Mareesburg Nursery visited on 26/06/25 • Site audit observations (26/06/25)	
Displacement or disturbance of animal life (and their migration paths) as a result of operation activities					
339	O42	• The delineated footprint of the Mareesburg TSF will not be exceeded.	• 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.	• Post site audit clarifications	
340		• Dust suppression on the gravel roads and TSF will be implemented to minimise dust fallout on vegetation surrounding the TSF.	• The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression along the services corridor or soil stockpiles. • This condition is rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	
341		• The area of habitat disturbed and isolated for the purpose of mining and processing activities will be limited, as far as is practical, to the minimum required for safe and efficient operation.	• The site perimeter was pegged prior to construction and the Environmental Officer advised the construction team that no disturbances outside the pegs were allowed.	• Post site audit clarifications	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
342	**O42**	• Noise disturbance to wildlife will be limited by using only pre-determined access routes and restricting noise to operational sites.	• The site construction team are advised by the environmental department that no disturbances outside the Mine footprint is allowed, with construction vehicles restricted to the main access and haul roads.	• Site audit observations and interviews (26/06/25)	☑
Cumulative impacts on biota					
343	**O43**	• To manage the area as a game farm / natural area, the carrying capacity of the total fenced area will be determined by evaluating the veld condition and available water.	• The 2023 BAP identified four management units within the Mototolo Mine Complex MRA, based on conservation status (*size of vegetation type, species and habitat diversity and condition of the area*) and functional status (*recreation use, ecological service and aesthetic value*). Water availability was not assessed. • No evidence of implementation of the 2023 BAP's action plans and activities, or monitoring of these, were provided, nor if/how the three natural management units (*Management unit 1: Sekhukhune Mountain Bushveld Habitat; Management unit 2: Montane Grasslands Habitat and Management unit 3: Freshwater Habitat*) are being managed.	• Der Brochen Biodiversity Action Plan, SAS (Jan 2023)	☒
344		• Fencing requirements will be determined by the Der Brochen's game management plan.	• The Mototolo Mine Complex perimeter is fenced and divided into fence zones, but this is based on the MRA and not on a game management plan.	• No evidence of a game management plan was provided.	☒
345		• The animal populations in the area will be monitored and managed (excess stock sold / culled / harvested).	• Periodic animal population counts are undertaken, with numbers monitored and managed.	• Site interviews (26/06/25)	☑
Disturbance/loss of aquatic animal species due to deterioration in surface water quality due to contamination from various forms of pollution from operational activities, increased sediment loads, oil and fuel spills and leaks					
346	**O44**	• All effort will be made to maintain this "good" biotic status and continuous seasonal biological monitoring will be performed when mining operation commences. Such future monitoring together with the already gathered baseline information will then be used for early detection of possible future biotic degradation to enable mitigation measures.	• SAS undertakes bi-annual (summer and winter) aquatic and toxicological assessments of the Groot Dwars River and Mareesburg Stream. • The monitoring results of the assessments are depicted as temporal and spatial comparisons of percentage change in values, showing significant deterioration or improvement in parameters.	• Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Mar 2025)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
347	O44	• A long term monitoring programme will be implemented to monitor physicochemical and biological components of the aquatic ecosystems within and below the mining area. The monitoring programme will commence as soon as mining operations start. This would enable the timely identification of required mitigation/environmental management procedures to maintain the high quality of this ecologically important aquatic ecosystem.	• The SAS monitoring includes: o water quality in the Groot Dwars River and Mareesburg Stream o habitat integrity of the biomonitoring sites o habitat suitability for micro-invertebrates o integrity of the aquatic macro-invertebrate community o taxological testing of the process water system and receiving environment. • The bi-annual reports also include recommendations for monitoring, prevention and mitigation.	• Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Oct 2024)	☑
348		• An appropriate biological index based on fish (such as the Fish Assemblage Integrity Index, Kleynhans, 1997 or Sensitivity-weighted Index of Biotic Integrity will also be included in order to quantify and classify the longer-term changes in biotic integrity.	• The general habitat integrity of the biomonitoring sites are assessed through application of the Index of Habitat Integrity (IHI), based on the protocol of Kleynhans et. al. (2008).		☑
349		• Erosion control measures in the form of temporary erosion prevention berms will be implemented during construction.	• SRK's Phase 4 detailed design report states that a clean water separation berm was included along the Phase 4 starter wall to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
350		• Clean water diversion bunds will be constructed upstream of the construction site prior to clearing areas for new infrastructure.	• The SRK Civil design report states that the Phase 1 pre-deposition works included the: o *'Excavation and construction of all temporary and permanent stormwater control channels and trenches.'*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
351	O44	• Emergency action plans will 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)	☑
352		• Chemical toilets will be provided at operations sites.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Photo 20 - chemical toilets at the TSF construction site	☑
Wetlands					
No additional impacts expected after the Construction Phase. However, the surrounding natural area should not be further impact upon. Management measures for the surrounding natural area should be implemented					
353	O45	• Clear separation of clean and dirty water will take place and diversion of clean water around the operational areas will ensure minimisation of the loss of catchment yield.	• Northern and Southern clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility. The channels flow into the northern and southern concrete stepped channels, with the discharge flowing through energy dissipaters before discharging into the Mareesburg Stream. • The clean water separation infrastructure also include intermediate stormwater bunds. • A clean water separation berm was also included along the Phase 4 starter wall to ensure that dirty runoff stormwater, generated from the MTSF walls, will be contained in paddocks. • The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface Water					
Alteration of drainage patterns caused by mining activities					
354	**O46**	• Contaminated runoff from the Tailings Dam will be collected on the dam and recycled to the process water circuit via the penstock and return water dam.	• The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
355		• Clear separation of clean and dirty water will take place and diversion of clean water around the operational areas will ensure minimisation of the loss of catchment yield.	• Northern and Southern clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility. The channels flow into the northern and southern concrete stepped channels, with the discharge flowing through energy dissipaters before discharging into the Mareesburg Stream. • The clean water separation infrastructure also include intermediate stormwater bunds. • A clean water separation berm was also included along the Phase 4 starter wall to ensure that dirty runoff stormwater, generated from the MTSF walls, will be contained in paddocks. • The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
356		• Clean stormwater diversions will assist in directing water to natural river courses. River diversions will be implemented, where necessary.	• Northern and Southern clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility. The channels flow into the northern and southern concrete stepped channels, with the discharge flowing through energy dissipaters before discharging into the Mareesburg Stream.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
357		• All rainfall runoff originating on top of the Tailings Dam will be discharged via a penstock to the return water dam. This water, together with all rain falling on the return water dam, will therefore be removed from the catchment. The water will, however, be utilised in the mine's process water circuit thus reducing demand on the mine's primary raw water source.	• The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
358	O46	• The slope faces will be topsoiled and revegetated.	• Only the Phase 1 embankment of the MTSF was rehabilitated, including hydroseeding. • Several areas of erosion were noted at the MTSF during the audit, where construction has been completed, and have not been rehabilitated.	• Photo 10 - revegetated Mareesburg TSF embankment	☒
359		• Water management and erosion control measures will be inspected regularly, and appropriate remedial measures will be implemented where necessary.	• The 2020 SRK design report recommends: '*Routine daily inspections by the operator to identify any erosion (especially following high rainfall), followed by approved repairs.' and 'In general terms, routine visual site inspections would be a daily required surveillance activity and would involve documenting any adverse conditions developing on the facility, (such as seepage on slope faces, physical damage to infrastructure caused by erosion or other events).*' • The 2022 Phase 4 Designs report states: '*Maintenance and inspections of the extent of sedimentation to be conducted by the MTSF operational team to be conducted regularly.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
Deterioration in surface water quality due to increased sediment load					
360	O47	• Clear separation of clean and dirty water will take place and diversion of clean water around the operational areas will ensure minimisation of the loss of catchment yield.	• Northern and Southern clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility. The channels flow into the northern and southern concrete stepped channels, with the discharge flowing through energy dissipaters before discharging into the Mareesburg Stream. • The clean water separation infrastructure also include intermediate stormwater bunds. • A clean water separation berm was also included along the Phase 4 starter wall to ensure that dirty runoff stormwater, generated from the MTSF walls, will be contained in paddocks. • The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
361		• Re-vegetation of all denuded areas.	• The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and all denuded areas will be ripped, graded, topsoiled and revegetated once handed over by the construction team.	• Site audit observations of the Phase 1 TSF embankment already rehabilitated (26/06/25)	
362	O47	• Water management and erosion control measures will be inspected regularly, and appropriate remedial measures will be implemented where necessary.	• The 2020 SRK design report recommends: '*Routine daily inspections by the operator to identify any erosion (especially following high rainfall), followed by approved repairs.' and 'In general terms, routine visual site inspections would be a daily required surveillance activity and would involve documenting any adverse conditions developing on the facility, (such as seepage on slope faces, physical damage to infrastructure caused by erosion or other events).*' • The 2022 Phase 4 Designs report states: '*Maintenance and inspections of the extent of sedimentation to be conducted by the MTSF operational team to be conducted regularly.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	
Contamination of surface water bodies due to diffuse pollution					
363		• Stormwater runoff from the small catchment area above the dam, rainfall on the Tailings Dam and supernatant water will be decanted through penstocks and an underdrain into a lined return water dam, from where it will be recycled back into the process. An emergency spillway will be provided to deal with extreme storm events.	• The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex (RWD1 and 2 are operational, RWD3 is currently being lined and excavations of RWD4 have commenced).	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	
364	O48	• Runoff from the side slopes of the dam will be caught on the step-in areas where solids will be trapped and the water evaporated. The step-in areas are designed to contain the 1:50 year storm.	• The 2020 SRK design report states that the selected alternative for water management on slopes was: o '*retaining direct rainfall on the step-ins for evaporation, as opposed to discharging the water down the slopes, limits the risks associated with the failure of these structures. However, as the berms are unlikely to have the capacity to retain flood events, engineered structures down slopes will be required for flood events greater than the berms capacity to retain the rainfall event.*' o '*…contain the expected run-off from a 1:50 year storm event.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
365	O48	• The Tailings Dam will be provided with underdrains and a solution trench along the full length of the toe of the starter wall. Seepage water collected in this trench will be discharged to the return water dam.	• The 2020 SRK design report refers to the seepage and underdrain infrastructure applicable to the MTSF: o '*Construction and placement of the toe drain and piping between the starter and deposition walls and tie-in to the outfall piping reporting to the solution trench.*' o '*Supernatant and stormwater decanted from the MTSF top surface will report to the two silt traps that will drain/spill into an open lined trapezoidal solution trench with a horizontal invert, thereby allowing water to be directed to either of the ponds by individual sluice gates.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	
366		• Revegetation of the Tailings Dam both during the Operational Phase and following closure will greatly reduce groundwater recharge as the resultant evapotranspiration.	• Only the Phase 1 embankment of the MTSF was rehabilitated, including hydroseeding. • The Mine and rehabilitation specialists, Agreenco, are aware of this commitment and all denuded areas will be ripped and graded during concurrent and final rehabilitation prior to revegetation.	• Photo 10 - revegetated Mareesburg TSF embankment	
367		• Monitoring will be implemented downstream of all Pipeline watercourse crossings to detect any impacts.	• The 2020 SRK design report recommends: '*Routine daily inspections by the operator to identify any erosion (especially following high rainfall), followed by approved repairs.' and 'In general terms, routine visual site inspections would be a daily required surveillance activity and would involve documenting any adverse conditions developing on the facility, (such as seepage on slope faces, physical damage to infrastructure caused by erosion or other events).*' • The 2022 Phase 4 Designs report states: '*Maintenance and inspections of the extent of sedimentation to be conducted by the MTSF operational team to be conducted regularly.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
368	**O48**	• Monitoring boreholes will be located below the return water dam solution trenches to detect any possible seepage beyond this point. Should seepage be detected, interceptor boreholes will be installed and the water pumped back to the return water dam.	• The 2020 SRK design report describes the proposed interception mitigation scenarios as: o Horizontal drainage interceptor boreholes or a combination of interception trenches and horizontal boreholes - the positions of these trenches and boreholes were modelled. o '*The under drainage below the base of the RWD ponds, as included in the current design, is at least 5 m below the existing ground levels. Groundwater intercepted by these drains should be monitored and responses used in conjunction with monitoring borehole observations to establish the need and optimal position of proposed cut-off drains and horizontal interceptor wells if/when required*.' • GCS's 2024 annual and Jul 2025 Water Quality Monitoring Reports for the MTSF: o '*Most boreholes indicated possible salt loading from the TSF site which is an indicator of decant via diffuse seepage into the aquifer. Nitrate concentrations in borehole MB-BH2, MB-BH4 and MB-BH5 exceeded the SAWQG Target Values*.' o '*The water quality at boreholes MB-BH3 and MB-BH4 is likely as a result of seepage from mining activities associated with lining of the TSF and indicate deteriorating water quality*.' • The 2024/2025 groundwater model update by Delta-H Water Systems Modelling PTY (Ltd) (Delta-H) states: '*a phased implementation approach as mitigation control for the groundwater plume emanating from the Mareesburg TSF and RWDs, whereby additional monitoring/scavenger boreholes will provide higher confidence levels in the current simulated plume extent as well as provide the potential to pump for hydraulic plume containment*.' • The water quality monitoring detected seepage in 2024 and 2025 from the MTSF, but no evidence has been provided on any interception mitigation measures, such and trenches or boreholes.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Progress Report for Mototolo Concentrator and Mareesburg TSF Water Quality Monitoring, GCS (Jul 2025) • Update of the Mareesburg Groundwater Model (2024/2025), Delta-H (April 2025)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
369	**O48**	• A leak/spill detection plan will be devised and implemented for all possible areas of leak/spillage.	• The Hydrocarbon Management Procedure details the actions required for the prevention and management of spills and leaks.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	✓
370		• An inspection and maintenance plan will be implemented to ensure that the Tailings Storage Facility and Pipelines always operate within specifications.	• The 2024 Inspection Report includes a Conformance Table for the MTSF against the Pipeline Design and Material Specifications, comparing operational values against the design. • The report summarises the findings of the: o quarterly site and drone inspections of the TSF and RWDs o monthly inspections of the VWP networks at MTSF to identify maintenance requirements o weekly assessment of the slope angles of the TSF by FA.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	✓
371		• Storm water containment is planned for the TSF as per the Stormwater Management Plan.	• SRK's Phase 4 design report includes a clean water separation berm along the Phase 4 Starter wall, to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks.	• Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	✓
372		• Implementation of good housekeeping practices at operational sites.	• Good housekeeping practices were observed at the MTSF and associated infrastructure.	• Site audit observations (26/06/25)	✓
Contamination of surface water quality at Mareesburg stream					
373	**O49**	• Regular inspections of the Pipeline route will be undertaken in order to detect leaks/ spillages timeously. Greater detail of the monitoring system are dealt with in Chapter 4.	• The 2020 SRK design report recommends: 'Routine daily inspections by the operator to identify any erosion (especially following high rainfall), followed by approved repairs.' and 'In general terms, routine visual site inspections would be a daily required surveillance activity and would involve documenting any adverse *conditions developing on the facility, (such as seepage on slope faces, physical damage to infrastructure caused by erosion or other events).'* • The 2022 Phase 4 Design report states: *'Maintenance and inspections of the extent of sedimentation to be conducted by the MTSF operational team to be conducted regularly.'*	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
374	O49	• Monitoring will be implemented downstream of all Pipeline watercourse crossings to detect any impacts.	• GCS conducts monthly surface water sampling at: o 2 monitoring localities on the Klein Dwars River o 4 monitoring localities on the Groot Dwars River o 8 monitoring localities along the Mareesburg tributary (M1, M2, M3, Mareesburg Underdrain, Return Water Dam 1 and Return Water Dam 2).	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Photo 29 - MTSF Water Monitoring Locations	☑
375		• A leak/spill detection plan will be devised and implemented for all possible areas of leak/spillage.	• The Hydrocarbon Management Procedure details the actions required for the prevention and management of spills and leaks.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	☑
376		• An inspection and maintenance plan will be implemented to ensure that the Tailings Storage Facility and Pipelines always operate within specifications.	• The 2024 Inspection Report includes a Conformance Table for the MTSF against the Pipeline Design and Material Specifications, comparing operational values against the design. • The report summarises the findings of the: o quarterly site and drone inspections of the MTSF and RWDs o monthly inspections of the VWP networks at MTSF to identify maintenance requirements o weekly assessment of the slope angles of the MTSF by FA.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Groundwater					
Deterioration of groundwater quality at the Tailings Dam					
377	**O50**	• The Tailings Dam design will take into consideration the shallow depths to groundwater and close proximity to the Mareesburg river and associated primary aquifer. The available runoff and downward/lateral infiltration available to recharge the aquifers and surface flow will be reduced to a minimum through proper Tailings Dam design.	• The 2020 SRK design report states that the selected alternative for water management on slopes was: o '*retaining direct rainfall on the step-ins for evaporation, as opposed to discharging the water down the slopes, limits the risks associated with the failure of these structures. However, as the berms are unlikely to have the capacity to retain flood events, engineered structures down slopes will be required for flood events greater than the berms capacity to retain the rainfall event*.' • SRK's Phase 4 design report includes a clean water separation berm along the Phase 4 Starter wall, to ensure that runoff stormwater, generated from the MTSF walls, will be contained in paddocks. • The supernatant and dirty stormwater are drained from the MTSF via a penstock system, with the dirty water discharging into the RWD complex.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
378		• Due to the shallow depth of the groundwater aquifer, if the detailed geotechnical work proves the soil permeability to be a problem (<10^{-6} cm/s), the following management measures will be implemented to reduce seepage: o The topsoil will be removed; o Any clayey subsoil will be removed.	• The 2020 SRK design report included hydraulic conductivity tests to calculate the permeability of the shallow upper soil zone; with result as an arithmetic mean of 3.8 x 10^{-6} m/s and a geometric mean of 2.2 x 10^{-6} m/s. • Pre-deposition activities included topsoil removal.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
379		• Implementation of a groundwater monitoring programme to monitor the boreholes at the Tailings Dam.	• GCS conducts: o monthly groundwater quality sampling at 12 boreholes at the MTSF o monthly static groundwater level determinations at 12 boreholes at MTSF.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Photo 29 - MTSF Water Monitoring Locations	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
380	O50	• The water management plan for the tailings will be a closed circuit system with no discharge to the environment.	• The 2020 SRK design report states: o '*MTSF closed tailings dam circuit water balance, were developed for the site during 2016*.' o MTSF Fundamental Civil Design Criteria: '*EDF – Environmental Design Flood (for operating facilities) – "no spill" or "zero discharge" climatic event requirements "no spill" or "zero discharge" climatic event requirements*.' • SRK's Phase 4 design report describes the updated designs to prevent discharge potentially contaminated runoff into the environment along the bunded corridor 57 new gabion type rock lenses. All dirty water discharge reports to the RWD complex, with only diverted clean stormwater being discharged back into the Mareesburg Stream.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
381		• The return water from the Tailings Dam will be pumped in a closed circuit to the Concentrator process water tank.	• The 2020 SRK design report states: o '*Supernatant and stormwater are removed from the tailings dam by gravity decant through penstock systems, via silt trap facilities before entering the RWD pond/s from where it is recycled back to the Mototolo Concentrator*.' • According to the 2025 Water Conservation/Water Demand Management (WC/WDM) Plan, extraneous water from the MTSF, which is collected via a penstock in the RWDs, is returned back to the Mototolo Concentrator for re-use.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mototolo Der Brochen Mining Complex 2024 WC/WDM Plan, Irene Lea Environmental and Hydrogeology, Feb 2025	☑
382		• Monitoring of water levels in monitoring boreholes as per the groundwater monitoring programme. Should the groundwater monitoring programme indicate that groundwater resources have been affected by dewatering, an alternative supply of water will be made available.	• GCS conducts: o monthly groundwater quality sampling at 12 boreholes at the MTSF o monthly static groundwater level determinations at 12 boreholes at MTSF. • The 2024 annual GCS report shows slightly increasing water level trends in groundwater levels at the MTSF. • The latest May 2025 GCS reports states that: '*Groundwater levels indicated a decrease of 0.2 m at most sites during the May 2025 event at Mareesburg TSF*.' • Monthly monitoring will continue.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Photo 29 - MTSF Water Monitoring Locations	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Contaminant plume migration (deterioration of groundwater and surface water quality)					
383	**O51**	• Installation of a lining system, either composite clay or HDPE, as per the requirements of the relevant legislation.	• The 2020 SRK design report states: o *'The MTSF and associated RWD liner/barrier system design was based on Regulation No 632, promulgated on 24 Jul 2015 enforced at the time of the Phase 1 detail design considering the Mototolo tailings classified as a "Type 3" waste.'* o *'The detailed engineering design requirements for the liner/barrier system are provided in Regulation 636 of the National Norms and Standards of Disposal of Waste to landfill, dated 23 Aug 2013. The Phase 1 design was based on these requirements but optimised to align with both the legislation and site constraints, in order to provide the most cost-effective, fit for purpose design solution that is equivalent to minimum requirements.'* o *'DWS, under cover of a letter dated 2016/07/04 and referenced KR Legge/B Seake/ C Fricker, in response to SRK application for the Mareesburg (Mototolo) Tailings Storage Facility and Return Water Dam Complex accepted the design submitted as being equivalent to the prescribed Class C lining system.'* • SRK's Phase 4 detailed design report furthermore refers to the liner/barrier system of the MTSF, bunds and RWDs.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑
384		• Seepage collection drains will be constructed to collect seepage emanating from the TSF. Seepage will be pumped to the Pollution Control Dam to be contained.	• The 2020 SRK design report describes the MTSF's seepage/solution collection system, as buried HDPE piping and/or open lined solution trench. • SRK's Phase 4 detailed design report furthermore describes the 2D seepage analysis and 3D seepage modelling, which was based on as-built drainage layouts, and the resultant drainage elements based on the outcomes.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
385	**O51**	• Hydraulic containment system will be implemented during Operational and Closure Phases.	• The 2020 SRK design report describes the groundwater modelling conducted by Delta-H in 2015, which indicated that a hydraulic containment system (i.e. cut-off drains and horizontal scavenger wells) would be able to limit the simulated plume from reaching the Mareesburg Stream. • The interception system is included as a mitigated closure scenario, and as phase 4 of the TSF is still under construction, this condition is noted and will be audited once implemented. • The 2024/2025 groundwater model update states: '*a phased implementation approach as mitigation control for the groundwater plume emanating from the Mareesburg TSF and RWDs, whereby additional monitoring/scavenger boreholes will provide higher confidence levels in the current simulated plume extent as well as provide the potential to pump for hydraulic plume containment.*'	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Update of the Mareesburg Groundwater Model (2024/2025), Delta-H (Apr 2025)	
Air Quality					
Increased dust levels due to mining operations					
386	**O52**	• During this operation the top of the crest wall will either be similarly treated or provided with some other suitable form of cover such as a waste rock.	• No evidence was provided nor observed of any treatment of the top of the MTSF. • A significant dust plume was furthermore observed on the MTSF during the audit.	• Photo 24 - Mareesburg TSF dust plume	
387		• As areas dry out on the top of the Tailings Dam, a light crust will form. Provided the side walls and the tops of the crest walls are adequately protected, this crust is expected to remain largely intact for several weeks to months, depending on the prevailing weather conditions. This should therefore provide adequate protection against excessive dust generation.	• Only the Phase 1 embankment of the MTSF was rehabilitated and is protected against wind erosion. • Based on the dust plume observed on the MTSF during the audit and the many unrehabilitated areas, these conditions are rated as non-compliant.		
388		• Vegetation of the sides of the Tailings Dam wall will be undertaken to reduce surface erosion.			
389		• A dust monitoring programme is in place and will be continued.	• Monthly DFO monitoring is undertaken by GCS at various sampling locations (single dust buckets) surrounding the MTSF.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
390	**O52**	• Dust suppression will be undertaken of the service roads and Tailings Facility when required.	• The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • No evidence was however provided of dust suppression along the services corridor or soil stockpiles. • This condition is rated as Noted, as the SS contractors were on R&R during the time of the audit, which is why it was stated that active dust suppression was not underway.	• Traffic Management Plan Mareesburg TSF Phase 4, SS (23/06/25) • Photo 25 - SS Water Bowser	
Noise					
Increase in ambient noise					
	O53	• No mitigation measures required due to the insignificant noise impact of the Mareesburg TSF during operations.	-	-	-
Visual					
Decrease in visual aesthetics of the area					
391	**O54**	• Vegetate tailings walls to blend into the natural environment.	• Only the Phase 1 embankment of the MTSF was rehabilitated, including hydroseeding. • The remainder of the MTSF walls and other disturbed areas have not been revegetated.	• Photo 10 - revegetated Mareesburg TSF embankment	
Cultural Heritage					
Although no additional impacts are envisaged during the Operational Phase, there are cultural heritage sites located around the Mareesburg TSF area that must be protected.					
392	**O55**	• Fence heritage sites near infrastructure with a significance rating of low to high.	• As explained in condition C60, a cemetery (AA89) with 5 graves, three with headstones, of high social importance, was identified by ARM in 2012, west of the MTSF and southwest of the services corridor. • The RPM Cultural Heritage Specialist confirmed that site AA89 is captured in the Mototolo Cultural Heritage Management Plan (CHMP) and online GIS-viewer, which informs all planning and designs, and includes a 100 m stand-off; the site is not currently within any development footprints, but will be monitored.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Der Brochen Project and Mototolo Complex: An integrated Report, Archaeological Resources Management (Apr 2012) • Der Brochen-Mototolo EMPr Audit Cultural Heritage Findings, Johan Nel (17/11/25)	
393		• Provide access to cemeteries and graves to families of the deceased through agreed mechanism.	• The SEP describes the involvement of the Moletsi NOKs Development Trust, consisting of the Mankge, Mosehla and Magahle families, whose 5 family graves were relocated in 2018 to make way for the construction of the MTSF. • The families have access to the relocated graves.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Mototolo Complex Stakeholder Engagement Plan 2024/2025 (MOTC-ALL-SER-PLAN-0008)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-12: Management measures in respect of operating the Helena TSF					
Topography					
Permanent alteration of topography due to the raising of the TSF					
394	**O56**	• On closure, the TSF will be shaped to be free draining. Erosion protection will be provided. o The TSF will be re-vegetated to blend into the natural environment.	• The Helena TSF (HTSF) reached its design life in Dec 2020 when deposition onto the HTSF ceased and it is therefore now being monitored and maintained. • Decommissioning and closure designs are currently underway, and will include shaping and erosion protection, including revegetation. • The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Soil samples were collected from the HTSF and detailed chemical analysis done to determine the HTSF's ability to support vegetation. A soil amelioration programme has been developed. Hydromulch (Pty) Ltd (Hydromulch) will undertake four different revegetation trials on the TSF during Q4 2025-Q1 2026 to determine the best rehabilitation methodology and seed mix for the side slopes of the HTSF.	• Site audit observations and interviews (25/06/25) • Photo 30 - grassed beach platform of HTSF • Photo 31 - grassed and bare side slopes • Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023	
Soils, Land Capability and Land Use					
Loss of soil resources					
395	**O57**	• Soils will be stripped and stockpiled for use during rehabilitation.	• The Mototolo Mine Complex Section Manager: Environmental, confirmed that soil was stripped and stockpiled and used in rehabilitation of the slopes of the HTSF.	• Post site audit clarifications	
396		• Shaped TSF to be covered in topsoil from stockpiles.	• There is no topsoil available to cover the HTSF. • Due to the absence of topsoil, a soil amelioration programme has been developed by Hydromulch, which is currently being tested as part of the revegetation trials on the side slopes.	• Site audit and interviews (25/06/25) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023	
397		• Re-vegetate topsoiled TSF.	• The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 30 - grassed beach platform of HTSF • Photo 31 - grassed and bare side slopes	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Contamination of soil resource		
398	**O58**	• Soils will be stripped and stockpiled for use during rehabilitation.	• No evidence was observed or provided of any soil stripping prior to establishment of the HTSF. • This condition was included in the original April 2005 EMPr for the HTSF and all subsequent consolidation and amendments. • The 2024 external audit also confirms that no topsoil stripping was undertake for the HTSF.	• Site audit and interviews (25/06/25) • Der Brochen Mine Addendum to the approved EMPR as part of the Feasibility Studies for possible mining on adjacent properties Environmental Impact Assessment Report and Environmental Management Programme, ERM (Apr 2005) • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☒
399		• Conduct weekly site inspections along the Pipeline to detect any spills or leakages.	• The RPM Environmental Officer conducts monthly inspections, which includes the identification of spills or leaks.	• Site audit and interviews (25/06/25) • Site audit information review	☒
400		• Immediate remediation of tailings spillages along Pipeline routes.	• Tailings deposition ceased at HTSF in Dec 2020. • Only water is currently being pumped between the RWDs, PCD and sump.	• Site audit information review	N/A
401		• An inspection and maintenance plan will be implemented to ensure that the TSF and Pipelines operate within specifications.	• The 2024 Inspection Report includes a Conformance Table for the TSF against the Pipeline Design and Material Specifications, comparing operational values against the design. • The report summarises the findings of the: o quarterly site and drone inspections of the TSF and RWDs o monthly inspections of the VWP networks at MTSF to identify maintenance requirements o weekly assessment of the slope angles of the TSF by FA.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	☑
			Biodiversity		
			Loss of insect species / communities of conservation value due to direct impacts such as loss of habitat or habitat fragmentation and indirect impacts such as dust and noise		
402	**O59**	• Regular monitoring of the Cicada population, as per the Biodiversity Action Plan.	• SAS undertook the annual Cicada assessment in Dec 2024, to determine the status and distribution within the Groot-Dwars River Valley and comparing that data to previous studies. • RPM is also consulting with Northam Platinum, who are conducting Cicada research at their adjacent Booysendal Mine.	• Annual *Dyticopycna sylvia* (*Pycna sylvia*) Assessment, SAS, Jan 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
403	O59	• Implementation of measures to reduce dust and noise impacts, including grassing and vegetation of the Tailings Dam and regular maintenance of operational vehicles and equipment.	• Monthly DFO monitoring is undertaken by GCS at various sampling locations (single dust buckets) surrounding the HTSF. • Annual noise monitoring is undertaken at the Mototolo Mine Complex boundary, at various locations within the Complex (including around the HTSF) and at the closest sensitive receptors. • The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF. • Servicing and maintenance of vehicles and equipment are done in line with the OEM schedule and as required.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Photo 32 - HTSF DFO monitoring locations • Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24)	☑
404		• Areas of disturbance will be limited to the footprints and vehicular movement outside of these demarcated areas will be restricted.	• Vehicles are restricted to the footprint of the HTSF and associated access roads. • The HTSF TMP depicts access gates, permitted access roads and traffic flow directions, as well as speed limits.	• Site audit and interviews (25/06/25) • Helena TMP Revised, Fraser Alexander (17/09/24)	☑
405		• Method statements will be supplied to the ECO before commencement of any disturbing/ destructive construction/operational activities such as removal/disturbance of trees or important species, vegetation, disturbance of streams, dry watercourses, drainage lines or riparian areas.	• No new construction, operational or any other disturbing activities are planned at the HTSF, with only monitoring, maintenance and revegetation activities currently underway.	• Site audit and interviews (25/06/25)	N/A
406		• Sufficient conservation areas, including all Cicada habitat, will remain intact, as part of an integrated conservation management plan for the area.	• Only the footprint of the HTSF and associated infrastructure was disturbed, with all surrounding natural areas remaining intact. • No new areas will be disturbed at the HTSF.	• Site audit information review	N/A
407		• The top of the Tailings Dam will be vegetated during closure and the side slopes fully vegetated to ensure a wilderness land capability.	• The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23)	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
408	O59	• Land to which soil has been applied will be rehabilitated under instruction and supervision of the ECO, through revegetation with indigenous species removed to nurseries and/or a combination of hydroseeding or other appropriate methods. Rehabilitation will be progressive throughout the life of the mine, and vegetation will be established as soon as a disturbing activity has ceased, to stabilize soils and reestablish habitats. Following revegetation, the site will be monitored and maintained until an acceptable vegetation cover has been achieved.	• Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023	
409		• All equipment and vehicles will be maintained in good operating condition. Any worn or faulty exhaust- and/or intake silencers will be replaced immediately.	• Servicing and maintenance of vehicles and equipment are done in line with the OEM schedule and as required.	• Site audit and interviews (25/06/25)	
410		• Noise emission levels will be checked regularly during construction and operation, and whenever a change in noise emission characteristics of any equipment is detected, it will be withdrawn for a maintenance check.	• Annual noise monitoring is undertaken at the Mototolo Mine Complex boundary, at various locations within the Complex (including around the HTSF) and at the closest sensitive receptors. • Readings at the closest sampling points north and south of the HTSF were all below the SANS 10103:2008 limit of 70 dBA. • No construction, operational or any other new activities are planned at the HTSF, with only monitoring, maintenance and revegetation activities currently underway.	• Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24)	
Loss of biodiversity					
411	O60	• Plants that are to be removed for rehabilitation purposes will be replanted in a nursery under the guidance of a recognized landscaper. The mine will be responsible for the operation of the Nursery during the operational and closure phases.	• No plants were relocated from the HTSF footprint prior to its construction. • The Mareesburg Nursery was established post-construction of the HTSF.	• Site audit information review	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface Water					
Deterioration of stormwater and surface water quality due to operations of the Tailings Dam and related activities					
412	**O61**	• Engineering designs include: o Cut-off trenches and walls above the Tailings Dam to separate clean water from the Tailings Dam. o Decanting of stormwater runoff from the small catchment area above the dam, rainfall on the Tailings Dam and supernatant water through penstocks and an underdrain into return water dams from where it will be recycled back into the process. o An emergency spillway to deal with extreme storm events. o Collection of runoff from the side slopes of the dam on step-in areas where solids will be trapped and collection of seepage from beneath the Tailings Dam in drains down slope of the dam to be returned into the process. o Location of the proposed fenced boundary of the site 100 m beyond the estimated 1:100 year flood line of the valley tributary thereby ensuring the upper catchment runoff is not affected.	• The 2012 SRK Mototolo Stormwater Master Plan (MSWMP) and specifically Figure 4.6 of the report, depicts the northern and southern cut-off trenches, trench next to the road, the penstock, spillways at RWD A and B and seepage collection dam. • The MSWMP also confirms that: '*Dirty water from the tailings dam is collected in a toe drain system and deposited via a pipe system through the base of the dam wall in two return water dams. Seepage is collected in two separate sumps from where the dirty seepage water is pumped back to the return water dams. Water from the tailings return water dams is pumped back to the concentrator Raw Water Dam for re-use in the concentrator plant*.' and that '*the concentrator and tailings facility are not within the 1:100 year floodline and also not within 100 m of the Groot Dwars River*.'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
413		• Good housekeeping practices will be maintained, including but not limited to separation of clean and dirty water, limiting exposed dirty surfaces and maximizing opportunities for re-use of water.	• Good housekeeping was observed in terms of ongoing separation of clean and dirty water, trials to determine the best revegetation options for the remaining unrehabilitated slopes of the HTSF, and continued pumping of water between the RWDs, PCD and sump. • Two areas of poor housekeeping were observed during the audit, requiring clean-up, with scrap metal, redundant equipment and scrap wood dumped at an old shed and old pipes dumped adjacent to the HTSF.	• Site audit information review • Photo 33 - HTSF poor housekeeping	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
414	O61	• Linear infrastructure such as roads and Pipelines will be inspected at least monthly to check that the associated water management infrastructure is effective in controlling erosion.	• FA conducts the following inspections at the HTSF, in line with the Operations, Maintenance, and Surveillance (OMS) Manual: o weekly inspections of the drain flows at the main drain outlet and at the outlets to the two RWDs o monthly monitoring of seepage areas at the southern side of the TSF along the access road at the RWD A pump and at the RWD A drain. • The RPM Environmental Officer furthermore conducts monthly inspections, which includes the identification of areas of erosion. • Quarterly drone surveys are also to assess freeboard, vegetation growth and possible erosion.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	☑
415		• All surface water management infrastructure constructed from soil (berms, canals and bunds) will be inspected at least monthly, with more frequent inspections during periods of high rainfall and after major rainfall events.	• FA conducts weekly and monthly inspections of different areas, including routine maintenance of the benches and slopes and ramps, both from an access point of view as well as the storm water management point of view. • The RPM Environmental Officer conducts monthly inspections, which includes the identification of areas of erosion	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	☑
416		• Energy dissipaters will be constructed at points where there are concentrated discharges of water that can cause significant erosion, such as in the clean water diversions around the Tailings Dam or along roads and Pipelines. The effectiveness of these dissipaters will be checked on a monthly basis.	• The MSWMP and layout plan do not refer to, nor depict, any energy dissipaters. • The 2020 design report by Rehabilitation Design & Construction Services (Pty) Ltd (Redco) was based on the requirement to upgrade the south and north trench around the HTSF to limit the further erosion of the trench and accommodate the sediment run-off which currently ends up in the wetland. The report recommends: o '*Construct stilling basin to dissipate energy to prevent excessive agitation of settled sediment.*' o '*Effective energy dissipation will improve settling effectiveness of sediment trap.*' • The Mototolo Mine Complex Section Manager: Environmental states that they are awaiting environmental permits to implement the Redco designs.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • Diversion drain west of the Helena TSF: Design Report, Redco (Sep 2020)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
417	O61	• If any of the inspections detailed above identify eroded areas, these should be repaired where necessary as soon as practicable.	• The FA responsibilities, in line with the HTSF OMS Manual include weekly and monthly inspections of different areas, including routine maintenance of the benches and slopes and ramps. • The 2020 Redco design report however describes significant erosion along the northern and southern diversion trenches, with both channels requiring lining, as '*only 60 m of the northern channel (480 m) and only 260 m of the southern channel (760 m) was found to be resistant to erosion under the 100-year flood event*.' • The Mototolo Mine Complex Section Manager: Environmental states that they are awaiting environmental permits to implement the Redco designs.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	
418		• Clean water diversions and dirty water collection facilities will be established before land clearing and construction commences, to prevent clean rainfall runoff becoming contaminated by construction activities.	• The MSWMP and layout plan describe and depict the northern and southern clean water diversion infrastructure as: o North: Diversion A (Pipes) and Diversion B (Gabion Canal) o South: Cut Off Trench. • Dirty water from the tailings dam is collected in a toe drain system and deposited via a pipe system through the base of the dam wall in two RWDs. • It is uncertain if the water management infrastructure were implemented prior to construction commencing, but the 2024 external audit rated this condition as compliant.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
419	O61	• Seepage will be monitored through annual sampling of soils around the Tailings Dam.	• The 2024 dam safety report states that there are five seepage areas which are monitored at the HTSF Complex: o The two areas previously noted as concerns are the seepage along the starter wall of HTSF above RWD B and the seepage near RWD A that was entering the plant area at the Mill Silo Area. o Other areas where seepage has/is being recorded and monitored are: on the southern side of the TSF along the access road, at the RWD A pump and at the RWD A drain. • SAS conducted a soil and land contamination assessment, including soil sampling, at the HTSF in Feb 2025, to determine changes in soil chemical characteristics which may have occurred as a result of possible seepage from the TSF.	• 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024) • Soil Contamination Assessment of the impacts of the historic & current storage of hazardous waste materials on soil chemical parameters at the Mototolo & Mareesburg TSFs, Limpopo Province, SAS (Apr 2025)	
420		• Any tailings spillage will immediately be cleaned up and the area remediated.	• Tailings deposition on the HTSF ceased in Dec 2020.	• Site audit information review	N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
421	O61	• Suitable engineering designs such as lining of the return water dams and perimeter drainage trenches will be implemented.	• Neither the RWDs, nor the drainage trenches were lined, which was a condition in all of the EMPrs, since the original 2005 EMPr. • The 2020 Redco design report refers to various required lining interventions to address the increasing instability, on-going erosion and sediment transport to the receiving environment: o Construct concrete lined side drain next to service road (at toe of TSF), to prevent erosion along steep sections at toe of TSF o Rectangular concrete lined channel to divert flow from the existing diversion channel to the stilling basin o Construct concrete lined stilling basin to dissipate energy to prevent excessive agitation of settled sediment. • The Mototolo Mine Complex Section Manager: Environmental states that they are awaiting environmental permits to implement the Redco designs. • The 2024 dam safety report states that Redco is conducting a design for the Helena TSF RWD A and RWD B Barrier System.	• Der Brochen Mine Addendum to the approved EMPR as part of the Feasibility Studies for possible mining on adjacent properties Environmental Impact Assessment Report and Environmental Management Programme, ERM (Apr 2005) • Diversion drain west of the Helena TSF: Design Report, Redco (Sepr 2020) • 2024 Annual Dam Safety Inspection (DSI) Report for Helena TSF and Mareesburg TSF, SRK (Nov 2024)	
422		• The outer slope of the rockfill starter wall will be topsoiled and vegetated. The outer side slopes of the Tailings Dam will continuously be vegetated.	• Some revegetation of the starter wall and side walls were undertaken, but no topsoiling, as none were stripped from the HTSF footprint. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 31 - grassed and bare side slopes	
423		• The top of the Tailings Dam will be vegetated during closure and the side slopes fully vegetated to ensure a wilderness land capability.	• The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.		

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424	O61	• Spillages of oil, grease and hydraulic fluids will be reported, cleaned up by removing the soil and disposing such soil in a waste receptacle or at a licensed site, or through biological treatment.	• The Hydrocarbon Management Procedure 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 ZW2L facility*.'	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	☑
425		• Contractors, staff and drivers will be trained on how to deal with spillage of tails, hydrocarbons and other potential contaminants.	• All contractors and employees attend the Mototolo Mine Complex SHEQ Induction prior to commencing work on site. • The Environmental Officer also advises the contractors about the various applicable procedures on site.	• Review of slides from the Mototolo Complex SHEQ Induction	☑
426		• A fenced boundary has been constructed for the Tailings Dam site which is located 100 m beyond the 1:100 year floodline of the valley tributary, ensuring the upper catchment runoff is not affected.	• The MSWMP states that: '*the concentrator and tailings facility are not within the 1:100 year floodline and also not within 100 m of the Groot Dwars River*.'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
427		• Stormwater runoff from the small catchment area above the dam, rainfall on the Tailings Dam and supernatant water is decanted through penstocks and an underdrain into return water dams from where it is recycled back into the process.	• The MSWMP confirms that: '*Dirty water from the tailings dam is collected in a toe drain system and deposited via a pipe system through the base of the dam wall in two return water dams. Seepage is collected in two separate sumps from where the dirty seepage water is pumped back to the return water dams. Water from the tailings return water dams is pumped back to the concentrator Raw Water Dam for re-use in the concentrator plant*.'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
428		• An emergency spillway is provided to deal with extreme storm events. Runoff from the side slopes of the dam is collected on the step-in areas where solids are trapped.	• The 2012 SRK MSWMP and specifically Figure 4.6 of the report, depicts the northern and southern cut-off trenches, trench next to the road, the penstock, spillways at RWD A and B and seepage collection dam.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Decrease of surface water quality		
429	**O62**	• Re-align cut-off trench to divert clean stormwater around the TSF.	• The 2020 Redco design report states that Redco designed stabilisation measures for the clean storm water diversion channel to the west of the HTSF in 2018. This was updated in the 2020 design report, stating that: o There is very limited space available west of the TSF towards the mountainside to accommodate the storm water diversion, new Der Brochen haul road and TSF reshaping and the upgrading of the storm water diversion will have to be done in combination. o Only 60 m of the northern channel (480 m) and only 260 m of the southern channel (760 m) was found to be resistant to erosion under the 100-year flood event. o The upgrading of the diversion channel and improved sediment management cannot wait for the finalisation of the other projects due to the on-going erosion and sediment transport to the receiving environment. • The Mototolo Mine Complex Section Manager: Environmental states that they are awaiting environmental permits to implement the Redco designs.	• Diversion drain west of the Helena TSF: Design Report, Redco (Sep 2020)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
430	**O62**	• Manage separation of clean and dirty water as per the Stormwater Management Plan.	• The 2020 Redco design report furthermore states that: o The channel (*clean storm water diversion channel to the west of the Helena TSF*) did not comply with the basic requirements of GNR704, viz. separation of clean and dirty water. o The clean and dirty water separation and dirty water containment system towards RWD B is not effective and present some risks based on the following findings: clean runoff is diverted and conveyed by the existing clean storm water diversion channel which is not stable; dirty runoff (red) from the TSF can discharge on the south-western side into the service road and will flow back into the clean storm water diversion channel near the southern corner of the TSF and just upstream of the wetland area; mixed clean and dirty water runoff is discharged into the wetland area by the storm water diversion channel due to the shortcomings indicated above. • The Mototolo Mine Complex Section Manager: Environmental states that they are awaiting environmental permits to implement the Redco designs. • SRK's Jun 2025 review of the stormwater management system as designed by Der Brochen (*diversion channel upstream of the HTSF*) recommends: o '*an energy dissipater below the discharge point should be constructed for both the south and north discharge areas, and* o *the interaction of the dirty water discharge to the natural environment should be reassessed in terms of erosion and capacity*.'	• Diversion drain west of the Helena TSF: Design Report, Redco (Sep 2020) • 374505/2025/13: S03974_Der Brochen - Haul Road / HTSF Stormwater Management (Clean Water), SRK 11/06/2025	☒
431		• Update water balance on an annual basis.	• The Water Balance and Salt Balance for the Mototolo Mine Complex are updated annually. • The latest IWWMP lists the actions for the HTSF based on the updated water balance.	• Mototolo and Der Brochen Mine 2024 Water Balance Update Report, Jones and Wagener, Jul 2025 • Mototolo Complex, Der Brochen and Mareesburg TSF Integrated Water and Waste Management Plan Update 2024, EnviroGistics (Jun 2025)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Groundwater					
Discharge and development of seepage zones along the banks of the Groot-Dwars River channel					
432	**O63**	• Cut-off trenches and walls above the Tailings Dam divert clean water from the Tailings Dam, decanting runoff and supernatant water through penstocks and an underdrain into return water dams from where it is recycled back into the process.	• The MSWMP and specifically Figure 4.6 of the report, depicts the northern and southern cut-off trenches, trench next to the road, the penstock, spillways at RWD A and B and seepage collection dam. • The report confirms that: '*Dirty water from the tailings dam is collected in a toe drain system and deposited via a pipe system through the base of the dam wall in two return water dams. Seepage is collected in two separate sumps from where the dirty seepage water is pumped back to the return water dams. Water from the tailings return water dams is pumped back to the concentrator Raw Water Dam for re-use in the concentrator plant.*'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
433		• An emergency spillway to deal with extreme storm events and collection of seepage from beneath the Tailings Dam in drains down slope of the dam to be returned into the process.	• The 2012 SRK MSWMP and specifically Figure 4.6 of the report, depicts the northern and southern cut-off trenches, trench next to the road, the penstock, spillways at RWD A and B and seepage collection dam.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
434		• Paddocks and solution trenches have been constructed between the foot of the Tailings Dam and the Mareesburg stream channel to intercept migrating slurry water along the soil profile/bedrock contact zone.	• This condition applies to the MTSF and not the HTSF.	• Site audit information review	N/A
435		• Regular monitoring through monitoring boreholes to ensure working of the tailings Pipelines through flow metres and visual inspections. Should seepage be detected, the repair of any damage will be undertaken.	• The 2024 annual Water Quality Monitoring Report (WQMR) states: o Groundwater samples and static groundwater levels are taken quarterly at various boreholes surrounding the HTSF. • Tailings deposition ceased at HTSF in Dec 2020 and only water is currently being pumped between the RWDs, PCD and sump. • Seepage has been detected and scavenger wells installed in 2018 to reduce the plume.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: First Quarter, Mar 2025, GCS (25/04/25)	☑
436		• Regular sampling of soils around the Tailings Dam to detect seepage and immediate clean-up and remediation of tailings spillage.	• SAS conducted a soil and land contamination assessment, including soil sampling, at the HTSF in Feb 2025, to determine changes in soil chemical characteristics which may have occurred as a result of possible seepage from the TSF.	• Soil Contamination Assessment of the impacts of the historic & current storage of hazardous waste materials on soil chemical parameters at the Mototolo & Mareesburg TSFs, Limpopo Province, SAS (Apr 2025)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
437	O63	• Continuous vegetation of Tailings Dam walls.	• Some revegetation of the starter wall and side walls were undertaken. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 31 - grassed and bare side slopes	☑
Contaminate plume migration (deterioration of groundwater and surface water quality)					
438	O64	• Cut-off trenches and walls above the Tailings Dam divert clean water from the Tailings Dam, decanting runoff and supernatant water through penstocks and an underdrain into return water dams from where it is recycled back into the process.	• The MSWMP and specifically Figure 4.6 of the report, depicts the northern and southern cut-off trenches, trench next to the road, the penstock, spillways at RWD A and B and seepage collection dam. • The report confirms that: '*Dirty water from the tailings dam is collected in a toe drain system and deposited via a pipe system through the base of the dam wall in two return water dams. Seepage is collected in two separate sumps from where the dirty seepage water is pumped back to the return water dams. Water from the tailings return water dams is pumped back to the concentrator Raw Water Dam for re-use in the concentrator plant*.'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
439		• An emergency spillway to deal with extreme storm events and collection of seepage from beneath the Tailings Dam in drains down slope of the dam to be returned into the process.	• The 2012 SRK MSWMP and specifically Figure 4.6 of the report, depicts the northern and southern cut-off trenches, trench next to the road, the penstock, spillways at RWD A and B and seepage collection dam.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	☑
440		• Paddocks and solution trenches have been constructed between the foot of the Tailings Dam and the Mareesburg stream channel to intercept migrating slurry water along the soil profile/bedrock contact zone.	• This condition applies to the MTSF and not the HTSF.	• Site audit information review	N/A
441		• Regular monitoring through monitoring boreholes to ensure working of the tailings Pipelines through flow metres and visual inspections. Should seepage be detected, the repair of any damage will be undertaken.	• The 2024 annual WQMR states: o Groundwater samples and static groundwater levels are taken quarterly at various boreholes surrounding the HTSF. • Tailings deposition ceased at HTSF in Dec 2020 and only water is currently being pumped between the RWDs, PCD and sump. • Seepage has been detected and scavenger wells installed in 2018 to reduce the plume.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: January to December 2024 Annual Report, GCS (11/02/25) • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: First Quarter, March 2025, GCS (25/04/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
442	O64	• Regular sampling of soils around the Tailings Dam to detect seepage and immediate clean-up and remediation of tailings spillage.	• SAS conducted a soil and land contamination assessment, including soil sampling, at the HTSF in Feb 2025, to determine changes in soil chemical characteristics which may have occurred as a result of possible seepage from the TSF.	• Soil Contamination Assessment of the impacts of the historic & current storage of hazardous waste materials on soil chemical parameters at the Mototolo & Mareesburg TSFs, Limpopo Province, SAS (Apr 2025)	☑
443		• Continuous vegetation of Tailings Dam walls.	• Some revegetation of the starter wall and side walls were undertaken. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 31 - grassed and bare side slopes	☑
Impact on groundwater quality					
444	O65	• Continue with groundwater monitoring on a quarterly basis to detect groundwater contamination. Should groundwater be contaminated, it will be pumped to the TSF for recirculation.	• Groundwater samples and static groundwater levels are taken quarterly at various boreholes surrounding the HTSF.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: First Quarter, Mar 2025, GCS (25/04/25)	☑
445		• Assessment and facilitation of nitrate degradation or retardation within the TSF or shallow aquifer.	• The 2024 annual WQMR showed that, on average, the HTSF contributed 46% of the site's nitrate load to the local aquifer whilst the remaining areas contributed <25%, with borehole MBH11 (located south-west to the HTSF) indicating the highest average nitrate concentrations at Mototolo Concentrator during the year. The report concluded that remediation measures should be prioritized at this point. • The 2025 (first quarter) GCS water monitoring report again states that mitigation or remediation measures should be prioritized at borehole MBH11. • The latest 2025 Delta-H report describes the scavenger system at the HTSF, aimed at reducing the contamination plume. Nitrate levels were below the WUL limit of 6 mg/l at the wells and associated boreholes from Jan-Dec 2024, while sulphate exceeded the WUL limit of 70 mg/l at the wells and boreholes in 2024.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • 2024 Annual Report (January to December) Scavenger Well (Hydraulic containment system) for the Helena TSF (Phase 3 - Monitoring Programme), Delta-H (23/01/25) • Photo 34 - HTSF boreholes and scavenger wells • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: First Quarter, Mar 2025, GCS (25/04/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
446	**O65**	• Hydraulic plume containment or reactive barriers to arrest emanating plume.	• Delta-H reports on the effectiveness of the scavenger system to address the contamination plume at the HTSF, consisting of two horizontal wells, in operation since 26/06/18, monitored via vertical boreholes. • All boreholes sampled showed a slight reduction in sulphate concentrations compared to the 2023 results. • The 2022/2023 updated model results (Delta-H, 2023) as well as the recent 2024 monitoring results show that pumping from the existing horizontal wells alone is insufficient for complete plume containment. The model was updated to account for an optimised pumping regime based on abstractions from existing as well as newly proposed scavenger wells. Results indicate that the existing and new strategically placed scavenger wells will be required to arrest the migrating plume towards receptors, i.e., tributaries and the Groot-Dwars River.	• 2024 Annual Report (January to December) Scavenger Well (Hydraulic containment system) for the Helena TSF (Phase 3 - Monitoring Programme), Delta-H (23/01/25)	
Air Quality					
Decreased ambient air quality due to wind-blown respirable particulates (increased PM_{10} concentrations) affecting Cicada habitats					
447	**O66**	• The outer side slopes of the Tailings Dam will continuously be vegetated.	• Some revegetation of the starter wall and side walls were undertaken. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 31 - grassed and bare side slopes	
448		• The top of the Tailings Dam will be vegetated during closure and the side slopes fully vegetated to ensure a wilderness land capability.	• The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.		
449		• Use of dust suppression and watering on TSF area to reduce dust.	• The latest 2025 reports show that all single dust buckets were legally compliant, with only single exceedances at two sites north of the HTSF. • This is mainly due to the vegetation project which was implemented by the operation. • This condition is noted by the Mototolo Mine Complex.	• Post site audit clarifications	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
450	**O66**	• If dust is noted on the access roads, applicable measures such as a watercart or chemical dust suppression will be implemented.	• No evidence of dust suppression was observed nor provided. • The latest 2025 reports show that all single dust buckets were legally compliant, with only single exceedances at two sites north of the HTSF. • This condition is noted by the Mototolo Mine Complex	• Site audit observations (26/06/25)	
451		• Frequent monitoring of dust buckets downwind of the Tailings Dam, as well as between the Tailings Dam and Cicada habitat to monitor dust fallout. Should dust monitoring determine that dust fallout levels exceed the limits, dust suppression measures will be put in place.	• Monthly DFO monitoring is undertaken by GCS at various sampling locations (single dust buckets) surrounding the HTSF. • The latest 2025 reports show that all single dust buckets were below the Non-Residential standard (<1 200 mg/m^2/day), except MOTO 11 and MOTO 12, both located to the north of HTSF, near the stockpile and ROM silo. Both locations are still legally compliant as these were single exceedances in the last 12 month period.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Photo 32 - HTSF DFO monitoring locations	
Decreased ambient air quality due to increased windblown dust fallout					
	O67	• No condition to assess.	-	-	-
Increase in nuisance dust					
452	**O68**	• Continue with dust fallout monitoring programme.	• Monthly DFO monitoring is undertaken by GCS at various sampling locations (single dust buckets) surrounding the HTSF.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Photo 32 - HTSF DFO monitoring locations	
453		• Use of dust suppression and watering on TSF area to reduce dust.	• The latest 2025 reports show that all single dust buckets were legally compliant, with only single exceedances at two sites north of the HTSF. • This is mainly due to the vegetation project which was implemented by the operation. • This condition is noted by the Mototolo Mine Complex.	• Post site audit clarifications	
454		• Vegetate side slopes of TSF continuously during operations.	• Some revegetation of the starter wall and side walls were undertaken. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 31 - grassed and bare side slopes	
Noise					
Increase in ambient noise					
	O69	• No mitigation measures required.	-	-	-

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Visual					
Reduced integrity of scenic views from roads in the surrounding area					
455	**O70**	• Progressive rehabilitation and dust control will be undertaken regularly.	• Some revegetation of the starter wall and side walls were undertaken. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Photo 31 - grassed and bare side slopes	✓
456		• Vegetate tailings walls to blend into the natural environment.			✓
457	**O71**	• The outer side slopes of the Tailings Dam will continuously be vegetated.			✓
458		• The top of the Tailings Dam will be vegetated during closure and the side slopes fully vegetated to ensure a wilderness land capability.	• The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23)	ⓘ
459		• If dust is noted on the access roads, applicable measures such as a watercart or chemical dust suppression will be implemented.	• No evidence of dust suppression was observed nor provided. • The latest 2025 reports show that all single dust buckets were legally compliant, with only single exceedances at two sites north of the HTSF. • This condition is noted by the Mototolo Mine Complex	• Site audit observations (26/06/25)	ⓘ
460		• Land to which soil has been applied will be rehabilitated under instruction and supervision of the ECO, through revegetation with indigenous species removed to nurseries and/or a combination of hydroseeding or other appropriate methods. Rehabilitation will be progressive throughout the life of the mine, and vegetation will be established as soon as a disturbing activity has ceased, to stabilize soils and reestablish habitats. Following revegetation, the site will be monitored and maintained until an acceptable vegetation cover has been achieved.	• The consolidated beach platform of the HTSF was revegetated by Agreenco from Jun-Aug 2023. • Revegetation trials are currently underway by Hydromulch to determine the best soil amelioration and rehabilitation methodologies, as well as seed mix for the side slopes of the HTSF.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023	ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
461	**O71**	• Areas of disturbance will be limited to the footprints given on the final layout drawings and vehicular movement	• Vehicles are restricted to the footprint of the HTSF and associated access roads. • The HTSF TMP depicts access gates, permitted access roads and traffic flow directions, as well as speed limits.	• Site audit and interviews (25/06/25) • Helena TMP Revised, Fraser Alexander (17/09/24)	☑
Table 9-13: Management measures in respect of operating the Mototolo Concentrator and Chrome Recovery Plant					
Topography					
Increased visibility and change in topography due to placement of the Mototolo Concentrator and Chrome Plant infrastructure					
462	**O72**	• All infrastructure will be demolished on closure of the Mototolo Concentrator and Chrome Plant and all disturbed areas will be reinstated and rehabilitated to a known past state or to an approximation of the natural condition. o Land to which soils have been applied will be rehabilitated under instruction and supervision of the ECO, through revegetation with indigenous species removed to nurseries and/or a combination of hydroseeding or other appropriate methods. Following revegetation, the site will be monitored and maintained until an acceptable vegetation cover has been achieved.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Demolishing of all infrastructure…* o *Demolish inert concrete…* o *Conduct a soil contamination investigation upon completion of demolition activities…* o *Backfill all resultant demolition excavations with suitable demolition waste material and covered with growth medium* o *Cover and growth medium placement will be undertaken to promote proper runoff drainage and prevent the formation of low points where water may pond*.' • Closure costs have been included for the Chrome Plant.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	ⓘ
Soils, Land Capability and Land Use					
Loss of soil resources due to erosion					
463	**O73**	• Special erosion control measures will have to be implemented should erosion be detected.	• Erosion control measures were observed at the Mototolo concentrator in the form of gabions and Löffelstein retaining walls. • The 2024 river crossing inspection report was also provided to the auditor as proof of erosion inspections at road crossings and culverts surrounding the concentrator.	• Photo 35 - erosion control measures at the concentrator • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024)	☑
464		• Drainage facilities will be designed to minimise the potential for soil erosion.	• The concentrator and associated infrastructure required the diversion of non-perennial drainage lines away from the working areas and a non-perennial tributary of the Groot Dwars River. Concrete culverts and gabions have been constructed to minimise erosion.	• Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
465	O73	• Energy dissipaters will be provided in areas where concentrated discharges could cause significant erosion, such as the plant.	• The discharge point at the concrete lined cut-off trench that diverts clean water around the concentrator, is lined with gabions, that assist with the dissipation of energy. • Concrete culverts were also installed at the concentrator tarred access road crossing with gabions at the culvert outlet.	• Photo 36 - gabions at the concentrator clean water diversion culvert	☑
466		• All drainage facilities will be checked at approximately three monthly intervals during the rainy season and any undue erosion or siltation, especially at discharge points, will be noted and repaired. The operation will identify the cause of such undue erosion or siltation and suitable remedial measures will be implemented.	• The Environmental Officer undertakes weekly inspection of different areas of the concentrator, which are compiled into a monthly report/ presentation, and includes the drainage facilities within the plant footprint. • Annual inspections are furthermore undertaken of all drainage facilities surrounding the plant. • Various areas of siltation were however observed within the concentrator footprint and surrounds: o concentrator dirty water channels: significantly silted o diesel refuelling area: the outlet valve and sump are silted o PCD: siltation due to overflows at the PCD entrance and silt drying beds.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025) • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Photo 37 - silted dirty water channels • Photo 38 - siltation at the PCD • Photo 39 - silted outlet valve and sump at the diesel refuelling area	☒
467		• No random driving across the terrain (outside of authorised routes) will be allowed – this will destroy the soil structure, cause unsightly tracks and lead to unnecessary soil erosion.	• Implementation of the Mototolo concentrator TMP and road signs restrict all vehicles and Trackless Mobile Machinery (TMM) to designated roads.	• Mototolo Complex Concentrator: Surface Traffic Management Plan, AAP (13/05/2025)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Disturbance/Loss of soil resources due to accelerated/ human induced soil erosion, or due to contamination of soils from spillages of fuels, oils, chemicals or waste					
468	**O74**	• The clean and dirty water management and separation at the Mototolo Concentrator and Chrome Plant will form part of the overall Mototolo Concentrator water management system.	• SRK compiled the MSWMP for the Mototolo concentrator in 2012 to meet Regulation 704 requirements, which includes clean and dirty water management. • Some areas of non-compliance were observed on site: o Concentrator PCD: the silt drying bed next to the PCD and roadway between the two areas are outside of the dirty water catchment, therefore runoff from this area is not contained; silt has also washed down from the area eastward, towards the Groot Dwars River tributary, as the retaining wall is too small. o Mechanical workshop: the drain around the mechanical workshop is shallow, with overflows visible. o Filter Plant: there are no dirty water trenches within the filter plant area. o ROM Stockpile: there are no dirty water trenches at the ROM Stockpile.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • Photo 40 - overflows at the silt drying beds • Photo 41 - mechanical workshop dirty water drain • Photo 42 - filter plant • Photo 43 - ROM stockpile	✗
469		• Maintenance of vehicles to ensure vehicles are in good running order.	• Servicing and maintenance of vehicles and equipment are done at the mechanical workshop, in line with the OEM schedule and as required.	• Site audit observations and interviews (25/06/25) • Photo 41 - mechanical workshop	✓
470		• Disturbance will be restricted to footprint areas depicted with no random driving across the terrain allowed.	• No disturbances outside of the concentrator footprint were observed. • Implementation of the Mototolo concentrator TMP and road signs restrict all vehicles and TMM to designated roads.	• Site audit observations (25/06/25) • Mototolo Complex Concentrator: Traffic Management Plan, AAP	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
471	**O74**	• All infrastructure will be demolished on closure of the Mototolo Concentrator and Chrome Plant and all disturbed areas will be reinstated and rehabilitated to a known past state or to an approximation of the natural condition.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Demolishing of all infrastructure…* o *Demolish inert concrete…* o *Conduct a soil contamination investigation upon completion of demolition activities…* o *Backfill all resultant demolition excavations with suitable demolition waste material and covered with growth medium* o *Cover and growth medium placement will be undertaken to promote proper runoff drainage and prevent the formation of low points where water may pond*.' • Closure costs have been included for the Chrome Plant. • The Closure Plan states that the Post-Closure Land Use (PCLU) for all infrastructure areas are Natural pasture/Conservation.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
472		• During reinstatement, surfaces will be ripped and stockpiled soil will be graded over previously disturbed/stripped areas with as little compaction as possible, with vehicles avoiding running over stockpiles by spreading from one side only.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Rip with agricultural equipment the footprint areas from where infrastructure has been removed as well as general disturbed areas to a minimum depth of 300 mm to alleviate compaction* o *Establish vegetation on prepared areas, implementing additional soil amelioration and fertiliser in instances where vegetation is established directly onto mine residue*.' • No evidence was provided nor viewed on site of topsoil stockpiles, and the Closure Plan also states: '*Identify and generate growth medium given the local topsoil deficit*.' • Thus, either soil/a growth medium will have to be developed/imported on closure or mine residues/substrates will need to be analysed, bio-remediated/restored, ameliorated and fertilised prior to vegetation establishment.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
473	O74	• Land to which soils have been applied will be rehabilitated under instruction and supervision of the ECO, through revegetation with indigenous species removed to nurseries and/or a combination of hydroseeding or other appropriate methods. Following revegetation, the site will be monitored and maintained until an acceptable vegetation cover has been achieved.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Rehabilitate resultant footprint areas as part of general surface rehabilitation*' o '*Rehabilitate disturbed areas, ensuring land stability, proper recontouring, revegetation with indigenous species, and erosion control.*' o *'…incorporate clear performance parameters to monitor and track progress toward land capability targets'* o *'Monitor vegetation establishment success over time.*'		
474		• Separate clean and dirty water systems will be constructed and will be maintained throughout the life of the Mototolo Concentrator and Chrome Plant.	• RPM have updated the original 2012 stormwater master plan drawing (*now called the Mototolo/Der Brochen IWWMP Master Map*), but no update of the SWMP document for the Complex was provided to the auditor. • As listed in Condition 468 above, various non-compliances were observed during the audit at the concentrator PCD, mechanical workshop, filter plant and ROM stockpile. • The dirty water system at the Chrome Plant was also observed to be inadequate to contain spills, with significant overflows observed during the audit, and an incident reported by the plant on 1 July 2025, where the sump overflow could not be contained in the bund wall and spilled into the stormwater infrastructure.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • Photo 44 - overflows at the Chrome Plant • Mototolo Concentrator Environmental Spill Level 1, RPM (01/07/2025)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
475	O74	• Drainage, stormwater and erosion control measures/structures will be checked at three monthly intervals and after significant rainfall events for siltation and effectiveness in preventing erosion. Silted, damaged or ineffective structures will be cleaned, repaired or replaced regularly.	• The Environmental Officer undertakes weekly inspection of different areas of the concentrator, which are compiled into a monthly report/ presentation, and includes the drainage facilities within the plant footprint. • Annual inspections are furthermore undertaken of all drainage facilities surrounding the plant. • Various areas of siltation were however observed within the concentrator footprint and surrounds: o concentrator dirty water channels: significantly silted o diesel refuelling area: the outlet valve and sump are silted o PCD: siltation due to overflows at the PCD entrance and silt drying beds.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025) • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Photo 37 - silted dirty water channels • Photo 38 - siltation at the PCD • Photo 39 - silted outlet valve and sump at the diesel refuelling area	☒
476		• Energy dissipaters will be constructed at sites of concentrated stormwater discharge.	• The discharge point at the concrete lined cut-off trench that diverts clean water around the concentrator, is lined with gabions, that assist with the dissipation of energy. • Concrete culverts were also installed at the concentrator tarred access road crossing with gabions at the culvert outlet.	• Photo 36 - gabions at the concentrator clean water diversion culvert	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
477	O74	• Silt and oil traps, and drip trays will be inspected frequently for effectiveness and cleaned/repaired /replaced regularly. Impermeable hazardous waste containers will be disposed of as required to prevent spillage. All water pumps will be maintained to prevent spills/leaks and placed in impermeable sumps to contain possible leakage.	• The Environmental Officer undertakes weekly inspections of different areas of the concentrator. • The silt drying beds next to the concentrator PCD is outside of the dirty water catchment, therefore any runoff from this area is not contained. It was also observed to be insufficiently sized for the amount of silt being deposited, with silt washed down from the area eastward, in the direction of the Groot Dwars River tributary and also covering most of the area between the PCD and drying beds. • The outlet valve in the bund wall, as well as the sump at the concentrator's diesel refuelling area, were observed to be completely silted. • There has furthermore been ongoing overflows of the Chrome Plant sump due to power dips causing additional water in the tailings, leading to the inability of the pumps to handle the volumes that the sump was receiving. Significant amounts of silt were observed outside the bund wall and containment infrastructure. Severe wear and damage was reported by the concentrator team on the sump and pump. • Hazardous waste containers are disposed of in line with the Mototolo Hydrocarbon Management and Waste Management Procedures, with hazardous waste bins and skips observed within the concentrator footprint during the audit.	• Site audit observations (25/06/25) • Photo 40 - insufficient containment at the concentrator PCD silt drying beds • Photo 39 - silted outlet valve and sump at diesel refuelling area • Mototolo Concentrator Environmental Spill Level 1, RPM (01/07/25) • Photo 44 - overflows at the Chrome Plant • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002) • Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 45 - hazardous waste bin and skip at the concentrator	
478		• Vehicles will be inspected regularly and kept in good running order, and leaks repaired immediately.	• Servicing and maintenance of vehicles and equipment are done at the mechanical workshop, in line with the OEM schedule and as required.	• Site audit observations and interviews (25/06/25) • Photo 41 - mechanical workshop	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Biodiversity					
Effects of fugitive dust on vegetation					
479	**O75**	• Dust monitoring to be undertaken as per the Dust Monitoring Plan.	• Monthly DFO monitoring is undertaken by GCS at various sampling locations (single dust buckets) surrounding the concentrator. • The latest 2025 reports show that all single dust buckets were below the Non-Residential standard (<1 200 mg/m^2/day), except MOTO 11 and MOTO 12, both located to the north of HTSF, near the stockpile and ROM silo. Both locations are still legally compliant as these were single exceedances in the last 12 month period.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Photo 46 - MOTC DFO monitoring locations	☑
480		• Dust suppression to be undertaken on gravel roads.	• Evidence of dust suppression was observed during the audit on the main access road.	• Site audit observations (25/06/25) • Photo 49 - wet suppression on the main concentrator access road	☑
481		• Water sprayers or dust plants, or other suitable methods, will be used to minimise dust at sources.	• The 2024 external audit states that: '*Water sprayers are used at various areas across the Concentrator Plant area to minimise dust at source*.'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
482		• The effect will be monitored and adjusted accordingly. The conveyor will be fitted with doghouse sheeting.	• Monthly DFO monitoring is undertaken by GCS at various sampling locations (single dust buckets) surrounding the concentrator. • The conveyors were observed to be covered with doghouse sheeting.	• Air Quality Monitoring for Mototolo/Der Brochen Complex, GCS (Mar 2025 and Apr 2025) • Photo 46 - MOTC DFO monitoring locations • Photo 47 - MOTC conveyors with doghouse sheeting	☑
Surface Water					
Disturbance/loss of aquatic animal species due to a deterioration in surface water quality due to contamination from various forms of pollution from operational activities, increased sediment loads, oil and fuel spills and leaks					
483	**O76**	• Regular inspections will be undertaken in order to detect spillages timeously.	• The Environmental Officer undertakes weekly inspection of different areas of the concentrator, which are compiled into a monthly report/ presentation, and includes the drainage facilities within the plant footprint.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
484	**O76**	• Monitoring of Groot-Dwars River will be implemented upstream and downstream of the Mototolo Concentrator and Chrome Plant to detect deterioration.	• There are surface water monitoring locations named 'Dwars upstream' and 'Dwars downstream', which are sampled monthly by GCS (locations depicted on Photo 48), with a further 4 more locations on the Groot Dwars River. • The 2024 annual monitoring report showed higher salt-bearing cations (calcium and sodium) downstream (G_Drs4 and G_Drs5) in comparison to upstream(G_Drs2 and G_Drs3), with elevated calcium along the River, and also an overall increase in nitrate levels (dominant mine indicator parameter) observed since June 2024. • The report furthermore concluded: '*The impact from Mototolo Concentrator on the Groot Dwars River appears to be limited. The difference between U/S Dwars River and D/S Dwars River in terms of EC (2.2 mS/m) and nitrate (0.33 mg/l) is negligible*.'	• Photo 48 - surface water monitoring locations surrounding the Mototolo Concentrator • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: January to December 2024 Annual Report, GCS (11/02/25)	☑
485		• A spill detection plan will be devised and implemented for all possible areas of spillage.	• The Hydrocarbon Management Procedure details the actions required for the prevention and management of spills and leaks.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	☑
486		• An inspection and maintenance plan will be implemented to ensure that the Mototolo Concentrator and Chrome Plant are operated within specifications.	• No proof of an inspection and maintenance plan was provided to the auditor. • The 2024 external compliance audit report also states: '*an Inspection and Maintenance Plan has not been developed*.'	• Document review • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☒
487		• All effort will be made to maintain this "good" biotic status and continuous seasonal biological monitoring will be performed when mining operation commences. Such future monitoring together with the already gathered baseline information will then be used for early detection of possible future biotic degradation to enable mitigation measures.	• SAS undertakes bi-annual (summer and winter) aquatic and toxicological assessments of the Groot Dwars River and Mareesburg Stream. • The monitoring results of the assessments are depicted as temporal and spatial comparisons of percentage change in values, showing significant deterioration or improvement in parameters.	• Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Mar 2025)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
488	O76	• A long term monitoring programme will be implemented to monitor physicochemical and biological components of the aquatic ecosystems within and below the mining area. The monitoring programme will commence as soon as mining operations start. This would enable the timely identification of required mitigation/ environmental management procedures to maintain the high quality of this ecologically important aquatic ecosystem.	• The SAS monitoring includes: o water quality in the Groot Dwars River and Mareesburg Stream o habitat integrity of the biomonitoring sites o habitat suitability for micro-invertebrates o integrity of the aquatic macro-invertebrate community o taxological testing of the process water system and receiving environment. • The bi-annual reports also include recommendations for monitoring, prevention and mitigation.	• Aquatic Biomonitoring and toxicological analysis of the aquatic resources in the vicinity of the Anglo Platinum Mototolo Concentrator, SAS (Oct 2024)	☑
489		• An appropriate biological index based on fish (such as the Fish Assemblage Integrity Index, Kleynhans, 1997 or Sensitivity-weighted Index of Biotic Integrity will also be included in order to quantify and classify the longer-term changes in biotic integrity.	• The general habitat integrity of the biomonitoring sites are assessed through application of the IHI, based on the protocol of Kleynhans et. al. (2008).		☑
Deterioration of stormwater and surface water quality due to operational activities at the Chrome Plant					
490	O77	• The area around the Mototolo Concentrator, within which the Chrome Plant is positioned, is within a controlled stormwater area. All process water will be recycled and re-used within the Mototolo Concentrator and Chrome Plant, with a zero discharge policy being maintained.	• There have been several overflows of the Chrome Plant sump due to power dips causing additional water in the tailings, leading to the inability of the pumps to handle the volumes that the sump was receiving. Significant amounts of silt were observed outside the bund wall and containment infrastructure. Severe wear and damage was reported by the concentrator team on the sump and pump. • An incident was reported by the plant on 1 July 2025, where the sump overflow could not be contained in the bund wall and spilled into the stormwater infrastructure.	• Mototolo Concentrator Environmental Spill Level 1, RPM (01/07/25) • Photo 44 - overflows at the Chrome Plant	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
491	**O77**	• Measure and monitor surface water quality in the Groot-Dwarsrivier, within and below the Mototolo Concentrator and Chrome Plant area.	• There are surface water monitoring locations named 'Dwars upstream' and 'Dwars downstream', which are sampled monthly by GCS (locations depicted on Photo 48), with a further 4 more locations on the Groot Dwars River. There are also 17 monitoring localities at the Mototolo Concentrator. • The 2024 annual monitoring report showed higher salt-bearing cations (calcium and sodium) downstream (G_Drs4 and G_Drs5) in comparison to upstream(G_Drs2 and G_Drs3), with elevated calcium along the River, and also an overall increase in nitrate levels (dominant mine indicator parameter) observed since June 2024. • The report furthermore concluded: '*The impact from Mototolo Concentrator on the Groot Dwars River appears to be limited. The difference between U/S Dwars River and D/S Dwars River in terms of EC (2.2 mS/m) and nitrate (0.33 mg/l) is negligible*.'	• Photo 48 - water monitoring locations surrounding the Mototolo Concentrator • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: January to December 2024 Annual Report, GCS (11/02/25)	☑
492		• Groundwater quality and quantity will be measured and monitored as per the monitoring protocol.	• GCS takes groundwater samples and records static groundwater levels on a quarterly basis at 19 boreholes surrounding the Mototolo concentrator, with MBH6 and MBH7R being located closest to the concentrator, and both monitored since 2011.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: January to December 2024 Annual Report, GCS (11/02/25) • Photo 48 - water monitoring locations	☑
493		• The dispersion of wastewater will be limited by using soak-away drains in the wash bay and domestic wash water discharge areas. Wastewater will be returned to the process.	• There are no wash bays at either the concentrator or Chrome Plant.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
494	O77	• Separate clean and dirty water systems will be constructed and will be maintained throughout the life of the Mototolo Concentrator and Chrome Plant.	• RPM have updated the original 2012 stormwater master plan drawing (*now called the Mototolo/Der Brochen IWWMP Master Map*), but no update of the SWMP document for the Complex was provided to the auditor. • As listed in Condition 468 above, various non-compliances were observed during the audit at the concentrator PCD, mechanical workshop, filter plant and ROM stockpile. • The dirty water system at the Chrome Plant was also observed to be inadequate to contain spills, with significant overflows observed during the audit, and an incident reported by the plant on 1 Jul 2025, where the sump overflow could not be contained in the bund wall and spilled into the stormwater infrastructure.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • Photo 44 - overflows at the Chrome Plant • Mototolo Concentrator Environmental Spill Level 1, RPM (01/07/2025)	☒
495		• Drainage, stormwater and erosion control measures/structures will be checked at 3 monthly intervals and after significant rainfall events for siltation and effectiveness in preventing erosion. Silted, damaged or ineffective structures will be cleaned, repaired or replaced regularly.	• The Environmental Officer undertakes weekly inspection of different areas of the concentrator, which are compiled into a monthly report/ presentation, and includes the drainage facilities within the plant footprint. • Annual inspections are furthermore undertaken of all drainage facilities surrounding the plant. • Various areas of siltation were however observed within the concentrator footprint and surrounds: o concentrator dirty water channels: significantly silted o diesel refuelling area: the outlet valve and sump are silted o PCD: siltation due to overflows at the PCD entrance and silt drying beds.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025) • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Photo 37 - silted dirty water channels • Photo 38 - siltation at the PCD • Photo 39 - silted outlet valve and sump at the diesel refuelling area	☒
496		• Energy dissipaters will be constructed at sites of concentrated stormwater discharge.	• The discharge point at the concrete lined cut-off trench that diverts clean water around the concentrator, is lined with gabions, that assist with the dissipation of energy. • Concrete culverts were also installed at the concentrator tarred access road crossing with gabions at the culvert outlet.	• Photo 36 - gabions at the concentrator clean water diversion culvert	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
497	O77	• Silt and oil traps, and drip trays will be inspected frequently for effectiveness and cleaned/repaired /replaced regularly. Impermeable hazardous waste containers will be disposed of as required to prevent spillage. All water pumps will be maintained to prevent spills/leaks and placed in impermeable sumps to contain possible leakage.	• The Environmental Officer undertakes weekly inspections of different areas of the concentrator. • The silt drying beds next to the concentrator PCD is outside of the dirty water catchment, therefore any runoff from this area is not contained. It was also observed to be insufficiently sized for the amount of silt being deposited, with silt washed down from the area eastward, in the direction of the Groot Dwars River tributary and also covering most of the area between the PCD and drying beds. • The outlet valve in the bund wall, as well as the sump at the concentrator's diesel refuelling area, were observed to be completely silted. • There has furthermore been ongoing overflows of the Chrome Plant sump due to power dips causing additional water in the tailings, leading to the inability of the pumps to handle the volumes that the sump was receiving. Significant amounts of silt were observed outside the bund wall and containment infrastructure. Severe wear and damage was reported by the concentrator team on the sump and pump. • Hazardous waste containers are disposed of in line with the Mototolo Hydrocarbon Management and Waste Management Procedures, with hazardous waste bins and skips observed within the concentrator footprint during the audit.	• Site audit observations (25/06/25) • Photo 40 - insufficient containment at the concentrator PCD silt drying beds • Photo 39 - silted outlet valve and sump at diesel refuelling area • Mototolo Concentrator Environmental Spill Level 1, RPM (01/07/25) • Photo 44 - overflows at the Chrome Plant • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002) • Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 45 - hazardous waste bin and skip at the concentrator	
498		• Vehicles will be inspected regularly and kept in good running order, and leaks repaired immediately.	• Servicing and maintenance of vehicles and equipment are done at the mechanical workshop, in line with the OEM schedule and as required.	• Site audit observations and interviews (25/06/25) • Photo 41 - mechanical workshop	
499		• Any spillage will be reported, cleaned up and soils remediated immediately. Any pollution or spills will be reported to the DWS regional director within 24 hours of the occurrence.	• As detailed in Condition 497 above, there have been overflows at the Chrome Plant, with silt spillages outside of the bund wall. The spills were all contained within the stormwater infrastructure leading to the PCD, and as there was no loss of containment nor spills into the environment, the incident did not required reporting. The Action Plan included the cleaning of the silt material by 11 Jul 2025.	• Mototolo Concentrator Environmental Spill Level 1, RPM (01/07/25)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
500	**O77**	• Drivers will be trained on how to deal with spillage of ore, hydrocarbons and other potential contaminants.	• All contractors and employees attend the Mototolo Mine Complex SHEQ Induction prior to commencing work on site. • The Environmental Officer also advises the contractors about the various applicable procedures on site.	• Review of slides from the Mototolo Complex SHEQ Induction	☑
Contamination of surface water bodies due to diffuse pollution					
501	**O78**	• Implement good housekeeping at operational sites. The final dirty water stream fed from the spiral plant reports to the Mototolo Concentrator process water tank.	• Good housekeeping practices were observed for most of the concentrator footprint. • The various areas of siltation and overflows, specifically at the PCD and Chrome Plant, appear to however have been an issue for some time and requires significant clean-up. The dirty water channels were also observed to be silted during the audit.	• Site audit observations (25/06/25)	☒
502		• Monitor pollution control infrastructure and the surrounding borehole.	• The Environmental Officer undertakes weekly inspection of different areas of the concentrator, which are compiled into a monthly report/ presentation, and includes the drainage facilities within the plant footprint. • Annual inspections are furthermore undertaken of all drainage facilities surrounding the plant. • GCS takes groundwater samples and records static groundwater levels on a quarterly basis at 19 boreholes surrounding the Mototolo concentrator, with MBH6 and MBH7R being located closest to the concentrator, and both monitored since 2011.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025) • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Photo 48 - water monitoring locations • Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25)	☑
503		• Much of the terrace areas will be paved with concrete and tar. Remaining areas will be planted to lawns and gardens.	• Natural vegetation, grassed areas and gardens were observed surrounding the hardstand footprint of the concentrator.	• Site audit observations (25/06/25) • Photo 49 - concentrator hardstand, surrounded by natural vegetation, grass and gardens	☑
504		• Individual components such as stores, sub-stations, stockpiles, workshops and the Concentrator will be individually bunded to contain spills. Bunded areas will be designed to contain at least 110% of the volume of the maximum potential spillage. Spilled material will be recovered and either returned to the process or will be disposed of to an appropriate site.	• Various individual bunded areas were observed, including: new and used oils are stored separately within bunded areas, the boilermaker paint store cages are in bunds, the diesel tank is stored within a bund and the hazardous waste skip is bunded. • Bund capacities were clearly displayed for all bunds, complying with legal requirements. • Spill kits, as well as hazardous waste bins and skips were available on site.	• Site audit observations (25/06/25) • Photo 50 - bunded oil storage • Photo 51 - bunded boilermaker paint store • Photo 52 - bunded diesel tank • Photo 45 - hazardous waste bin and bunded skip at the concentrator	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
505	O78	• A drain will be provided upslope of the plant terrace to divert clean stormwater runoff away from the terrace. This drain will be designed to cater for the 1:50 year return period flood. The discharge point will be designed to allow for the safe discharge of water without causing any erosion.	• The 2012 SRK SWMP states that: o '…*clean water is diverted from the plant and tailings dam via a cut off trench to the West that diverts the clean water around the concentrator plant and tailings dam to small tributaries of the Groot Dwars River.*' • The report concluded that the north and south cut off trenches complied with the required 1:50 year storm runoff, as did clean water diversion B (downslope of the plant). The capacity of clean water diversion A (upslope of the plant) was however not able to contain a 1:50 years runoff event. • No evidence was provided to confirm if the capacity of this diversion was increased. • The discharge point at the concrete lined cut-off trench that diverts clean water around the concentrator, is lined with gabions, that assist with the dissipation of energy.	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • Photo 53 - stormwater management infrastructure at the Mototolo concentrator	☒
506		• A drain designed to cater for the 1:50 year return period flood event will be constructed downslope of the terrace to direct contaminated water discharges from this area to the settlers.			☑
507		• Water from the immediate plant area will drain to a lined sump designed to retain wash down water and water from small rainfall events.	• Various lined sumps are located within the concentrator footprint and at the concentrator PCD.	• Document review	☑
508		• All runoff from terraces not catered for by the sumps will flow to lined settlers. This settler system will be designed to provide sufficient capacity to allow for the settlement and containment of the 1:50 year return period flood event. A spillway sized for the 1:50 year event will be provided. Settled water will be recycled for use in the process water circuit.	• Dirty water from the concentrator area is collected through a series of open concrete canals and deposited via a silt trap to the lined PCD. • The PCD has been designed to manage a 1:50-year flood event with a freeboard of 0.5 m (*GN704 exemption applied for, for the 0.8 m requirement*). • The PCD was designed to be operated dry; therefore water should be continuously pumped to the concentrator RWD. This is however not currently the case and the PCD provides an integral storage component in the Water Balance.	• Mototolo Complex, Der Brochen and Mareesburg TSF Integrated Water and Waste Management Plan Update 2024, EnviroGistics (Jun 2025)	☒
509		• The sumps and settlers will be checked regularly. Silt will be removed and disposed of on the Tailings Dam, as required, in order to retain sufficient capacity in these ponds.	• Collected silt in the silt trap is pumped back to the tailings tank at the concentrator. • Excessive silt build-up was noticed at the PCD and silt drying beds during the audit and was reported previously: o 2012 SRK SWMP o 2023 IWWMP o 2024 external audit.	• Mototolo Complex, Der Brochen and Mareesburg TSF Integrated Water and Waste Management Plan Update 2024, EnviroGistics (Jun 2025) • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
510	**O78**	• The quality of the water in the settlers will be monitored.	• Water quality is monitored by GCS at the PCD, PCD Drainage Line 1 and 2. • The Dwars River is furthermore sampled at Dwars River PCD after confluence (Dwars PCD AC) and Dwars River PCD before confluence (Dwars PCD BC) - before and after the confluence with the PCD drainage line 2.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25)	☑
Groundwater					
Deterioration of groundwater quality					
511	**O79**	• Continue with groundwater monitoring on a quarterly basis to detect groundwater contamination. Should groundwater be contaminated, it will be pumped to the Helena TSF for recirculation.	• GCS takes groundwater samples and records static groundwater levels on a quarterly basis at 19 boreholes surrounding the Mototolo concentrator, with MBH6 and MBH7R being located closest to the concentrator, and both monitored since 2011. • The 2024 Annual Water Quality Report states: o '*It is recommended that an investigation be conducted to determine the source of contamination downgradient from the PCD at borehole MBH6*.' • Scavenger wells were installed below the HTSF, but no evidence has been provided of pumping of contaminated groundwater surrounding the concentrator.	• Water Quality Monitoring Report for the Der Brochen Project, Mototolo Concentrator & Mareesburg TSF: Jan to Dec 2024 Annual Report, GCS (11/02/25) • Photo 48 - water monitoring locations	☒
Air Quality					
Decreased ambient air quality due to the operation of the Chrome Plant					
512	**O80**	• Dust generated on access roads will be managed through appropriate measures such as a watercart or chemical dust suppression.	• Evidence of dust suppression was observed during the audit on the main access road.	• Site audit observations (25/06/25) • Photo 49 - wet suppression on the main concentrator access road	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
513	**O80**	• Reinstatement and rehabilitation of all disturbed areas at closure.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Demolishing of all infrastructure…* o *Demolish inert concrete…* o *Conduct a soil contamination investigation upon completion of demolition activities…* o *Backfill all resultant demolition excavations with suitable demolition waste material and covered with growth medium* o *Cover and growth medium placement will be undertaken to promote proper runoff drainage and prevent the formation of low points where water may pond*.' • Closure costs have been included for the Chrome Plant. • The Closure Plan states that the PCLU for all infrastructure areas are Natural pasture/Conservation.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
514		• Dust will be controlled on site with water carts or dust suppressants.	• Evidence of dust suppression was observed during the audit on the main access road. • The 2024 external audit states that: '*Water sprayers are used at various areas across the Concentrator Plant area to minimise dust at source*.'	• Site audit observations (25/06/25) • Photo 49 - wet suppression on the main concentrator access road • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	
515		• A speed of 40 kmph will be strictly enforced on all mine access roads.	• The concentrator TMP indicates a speed limit of 20 km/h on internal plant roads. • This is in line with the Mototolo Mine Complex Traffic Management Procedure, which states: o '*40 km/h where sign posted* o *20 km/h in all Mototolo Complex Surface Operational areas* o *16 km/h for all underground operations*.'	• Mototolo Complex Concentrator: Surface Traffic Management Plan, AAP (13/05/2025) • Mototolo Complex Traffic Management Procedure (MOTC-TEC-TMM-PRO-0030)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
516	**O80**	• All infrastructure will be demolished on closure of the Mototolo Concentrator and Chrome Plant and all disturbed areas will be reinstated and rehabilitated to a known past state or to an approximation of the natural condition.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Demolishing of all infrastructure…* o *Demolish inert concrete…* o *Conduct a soil contamination investigation upon completion of demolition activities…* o *Backfill all resultant demolition excavations with suitable demolition waste material and covered with growth medium* o *Cover and growth medium placement will be undertaken to promote proper runoff drainage and prevent the formation of low points where water may pond*.' • Closure costs have been included for the Chrome Plant. • The Closure Plan states that the PCLU for all infrastructure areas are Natural pasture/Conservation.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
517		• Land to which soils have been applied will be rehabilitated under instruction and supervision of the ECO, through revegetation with indigenous species removed to nurseries and/or a combination of hydroseeding or other appropriate methods.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Rip with agricultural equipment the footprint areas from where infrastructure has been removed as well as general disturbed areas to a minimum depth of 300 mm to alleviate compaction* o *Establish vegetation on prepared areas, implementing additional soil amelioration and fertiliser in instances where vegetation is established directly onto mine residue*.' • No evidence was provided nor viewed on site of topsoil stockpiles, and the Closure Plan also states: '*Identify and generate growth medium given the local topsoil deficit*.' • Thus, either soil/a growth medium will have to be developed/imported on closure or mine residues/substrates will need to be analysed, bio-remediated/restored, ameliorated and fertilised prior to vegetation establishment.		

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
518	**O80**	• Following revegetation, the site will be monitored and maintained until an acceptable vegetation cover has been achieved.	• The latest 2024 Closure Plan includes the following closure commitments for the concentrator: o '*Rehabilitate resultant footprint areas as part of general surface rehabilitation*' o '*Rehabilitate disturbed areas, ensuring land stability, proper recontouring, revegetation with indigenous species, and erosion control.*' o *'…incorporate clear performance parameters to monitor and track progress toward land capability targets'* o 'Monitor vegetation establishment success over time.' • Closure costs have been included for the Chrome Plant.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
Noise					
Increase in ambient noise levels due to operation of the Chrome Plant					
519	**O81**	• Keeping vehicles silencer units in good working order and restricting activities to the dedicated mining areas.	• Servicing and maintenance of vehicles and equipment are done at the mechanical workshop, in line with the OEM schedule and as required.	• Site audit observations and interviews (25/06/25) • Photo 41 - mechanical workshop	
520		• Should community complaints be received with regard to noise generation, mine management will investigate these and implement appropriate management measures.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• Mototolo Complex Grievance Register, 2025 • Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24)	
Visual					
Decrease in visual aesthetics of the area					
521	**O82**	• Refer to O28 for applicable management measures.	• O28 refers to groundwater management measures and is not applicable to management of the visual impacts.	-	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Table 9-14: Management measures in respect of utilising access roads					
Soils, Land Capability and Land Use					
Loss of soil resources due to erosion					
522		• Erosion control measures will have to be implemented throughout the site for the entire life of the mine.	• Erosion control measures were observed along the various access roads at the Complex.	• Photo 54 - aggregate used as erosion control along the HTSF access road • Photo 55 - gabions at one of the MOTC main access road river crossings	☑
523	**O83**	• Drainage facilities will be designed to minimise the potential for soil erosion.	• The concentrator and associated infrastructure required the diversion of non-perennial drainage lines away from the working areas and a non-perennial tributary of the Groot Dwars River. Concrete culverts and gabions have been constructed to minimise erosion. • Erosion control measures were also implemented along the roads and where the roads cross rivers/streams. • The SRK Civil design report states that: o '*Bridges and culverts have been designed where the access roads cross rivers or stormwater drainage lines.'* o *'The crossings have been designed to handle the 1:100 year flood event and have sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone and/or infrastructure.'*	• Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑
524		• Energy dissipaters will be provided in areas where concentrated discharges could cause significant erosion, such as access/service roads.	• The discharge point at the concrete lined cut-off trench that diverts clean water around the concentrator, is lined with gabions, that assist with the dissipation of energy. • Concrete culverts were also installed at the concentrator tarred access road crossing with gabions at the culvert outlet.	• Photo 56 - culvert at the access road river crossing	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
525	**O83**	• All drainage facilities will be checked at approximately three monthly intervals during the rainy season and any undue erosion or siltation, especially at discharge points, will be noted and repaired. The mine will identify the cause of such undue erosion or siltation and suitable remedial measures will be implemented. o Unused roads will be rehabilitated after exploration, while high traffic roads will be surfaced. Other roads still used will be maintained and any new roads will have proper engineered designs to prevent erosion. No random driving across the terrain (outside of authorised routes) will be allowed – this will destroy the soil structure, cause unsightly tracks and lead to unnecessary soil erosion.	• The Environmental Officer undertakes weekly inspection of different areas of the concentrator, which are compiled into a monthly report/ presentation, and includes the drainage facilities. • Annual inspections are furthermore undertaken of all drainage facilities surrounding the plant. • Various areas of siltation were however observed within the concentrator footprint and surrounds. • Erosion was also observed along the MTSF access road, northern stormwater channel around the MTSF, as well as erosion and siltation reported by Redco at the HTSF clean storm water diversion channel to the west of the facility.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025) • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Diversion drain west of the Helena TSF: Design Report, Redco (Sep 2020)	☒
Soil contamination due to spillage of fuel, oil and chemicals					
526	**O84**	• Water pollution management measures are designed to contain all polluted water, thereby minimising the potential for soil contamination from this source. Any spillage will be cleaned up and remediated.	• The 2012 SRK SWMP states that: o '*All (road) crossings have sufficient capacity for the stormwater runoff of a 1:50 year storm event.*' • The Hydrocarbon Management Procedure 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 ZW2L facility.*'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012) • Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV- PRO-0002)	☑
527		• Any spills will be cleaned up. More serious spills will be reported and treated.	• The Hydrocarbon Management Procedure describes the clean-up of chemical spills and hydrocarbon spills, as well as the remediation of all polluted sites. • The 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.*'	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
528	O84	• An inspection and maintenance plan will be implemented to ensure that the ore transportation operates within specifications.	• No proof of an inspection and maintenance plan was provided to the auditor. • The 2024 external compliance audit report also states: '*an Inspection and Maintenance Plan has not been developed*.'	• Document review • 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	✗
529		• Regular servicing of vehicles in well-constructed, bunded areas.	• Servicing of vehicles and equipment is done at the various workshops and at the contractor's yards on site, in line with the OEM schedule.	• Photo 23 - SS workshop • Photo 41 - concentrator mechanical workshop	✓
530		• Regular cleaning and maintenance of drains and stormwater control facilities.	• As stated in Condition 528, no Inspection and Maintenance Plan has been developed. • Furthermore, based on the siltation observed at various areas at the Mototolo Mine Complex (*siltation at the HTSF clean storm water diversion channel, siltation at the concentrator PCD and Chrome Plant, dirty water channels and diesel refuelling bund outlet valve and sump*), more frequent cleaning and maintenance is required.	• Site audit observations (25/06/25)	✗
531		• Containment and management of spillage.	• The Hydrocarbon Management Procedure describes the various spillage containment mechanisms, designed to prevent substances from escaping to the environment, as well as the management of spills.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	✓
532		• Spill kits will be provided on site for ad hoc spill clearing.	• Spill kits were observed at various locations at the Mototolo Mine Complex.	• Photo 18 - spill kits	✓
Surface Water					
Deterioration of surface water quality due to erosion, spillages and accidental discharges on roads					
533	O85	• Stormwater culverts at watercourse crossings will be designed and constructed to accommodate the 1:50 year storm event.	• The 2012 SRK SWMP states that: o '*All (road) crossings have sufficient capacity for the stormwater runoff of a 1:50 year storm event*.'	• Stormwater Master Plan for the Mototolo Joint Venture, SRK (Jun 2012)	✓
534		• Erosion protection and energy dissipaters will be constructed at the crossings as applicable.	• The discharge point at the concrete lined cut-off trench that diverts clean water around the concentrator, is lined with gabions, that assist with the dissipation of energy. • Concrete culverts were also installed at the concentrator tarred access road crossing with gabions at the culvert outlet.	• Photo 56 - culvert at the access road river crossing	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
535	**O85**	• Emergency action plans will 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)	☑
Noise					
Increase in ambient noise levels on the surrounding communities as a result of mining activities					
536	**O86**	• Regular servicing and maintenance of vehicles.	• Servicing of vehicles and equipment is done at the various workshops and at the contractor's yards on site, in line with the OEM schedule.	• Photo 23 - SS workshop • Photo 41 - concentrator mechanical workshop	☑
Traffic and Transportation					
Increased generation of traffic on existing road networks during operation					
537	**O87 (refer to O15)**	• Traffic conditions to be monitored annually, should traffic congestion increase, appropriate mitigation measures will need to be explored and implemented.	• The various TMPs do not refer to the monitoring of traffic conditions, or mitigation measures.	• No evidence was provided of traffic assessments	☒
Impact on pedestrian and cyclists					
538	**O88 (refer to O16)**	• Control access by cyclists and pedestrians to the site.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services.	• Site audit observations and interviews (24-26/06/25)	☑
Impact on road safety conditions					
539	**O89 (refer to O17)**	• Drivers of heavy Operation mining vehicles will attend a road safety and driving course to sensitise them to the impact they have on driving conditions for other drivers on the road.	• Equipment drivers obtain the applicable permits, licences and training to safely operate specific construction vehicles.	• Site interviews (26/06/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Decreased condition of the road network		
540	**O90 (refer to O18)**	• A standard operating procedure is developed for all mine drivers to identify and report potholes and edge breaks to the operations manager who in turn will report it to the relevant authorities.	• The 2024 external audit states that: '*A Road Safety Disciplinary Procedure has been developed and is currently in draft format. This has however not as yet been implemented as it is in draft format.*'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • No evidence was provided of this or another procedure regarding road conditions.	☒
			Table 9-17: Social management measures to be implemented during operations		
			Socio-economic		
			Prolonged employment opportunities		
541	**O101**	• Enhance local employment and procurement opportunities where possible.	• The RPMMototolo 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	• RPM Mototolo Mine Contractor Recruitment Process	☑
			Contribution to the local and regional economy		
542	**O102**	• Participation in Local Economic Development Programmes.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • The SLP 3 furthermore shows the different LED programmes that the company participates in.	• Mototolo Mine Complex SLP Implementation Plan 2025 • Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited	☑
543		• The operation will inject investment into the local and regional economy through the employment of labour, use of local support services and the use of local infrastructure. The operation will ensure that as much of this as possible is directed to the local economy. Since it is unlikely that suppliers from within the study area (local level) will be suitable, goods should be preferentially procured in the immediate focus area and, if unsuccessful, only then in the broader focus area.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
544	O102	• AAP will inform businesses, where appropriate, through appropriate business fora about available opportunities and how business may access these. For example, the Steelpoort Business Forum can be used to engage with businesses in the local and regional areas.	• The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
545		• The revised SLP should reflect the targets for procuring goods locally and regionally, and to develop local suppliers. Contractors will be required to submit annual reports on how they are attaining these targets as part of AAP's SLP reporting to Government.	• The revised SLP 4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	ⓘ
546		• AAP will identify potential service providers for longer term procurement. o Develop a social strategy, once mining has commenced, in line with the life of mine plan to assist in leaving a positive legacy. These strategies will be reviewed and monitored for implementation.	• The 2025 SLP Implementation tracker lists Zimele as responsible for supplier development (including company assessments and training of local suppliers), enterprise development and youth development. • The SEP describes the LAS in support of this SEP, which is aimed at capturing all Accountability Mechanisms that will be used to engage and inform external stakeholders. It furthermore describes the implementation, monitoring and evaluation of all engagement activities.	• Mototolo Mine Complex SLP Implementation Plan 2025 • Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
Contribution to national economic growth					
547	O103	• The operation will inject investment into the local and regional economy through the employment of labour, use of local support services and the use of local infrastructure. The operation will ensure that as much of this as possible is directed to the local economy. Since it is unlikely that suppliers from within the study area (local level) will be suitable, goods should be preferentially procured in the immediate focus area and, if unsuccessful, only then in the broader focus area.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
548		• AAP will inform businesses, where appropriate, through appropriate business fora about available opportunities and how business may access these. For example the Steelpoort Business Forum could be used to engage with businesses in the local and regional areas.	• The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
549	O103	• The revised SLP should reflect the targets for procuring goods locally and regionally, and to develop local suppliers. Contractors will be required to submit annual reports on how they are attaining these targets as part of AAP's SLP reporting to Government.	• The revised SLP 4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	
550		• AAP will identify potential service providers for longer term procurement.	• The 2025 SLP Implementation tracker lists Zimele as responsible for supplier development (including company assessments and training of local suppliers), enterprise development and youth development.	• Mototolo Mine Complex SLP Implementation Plan 2025	
551		• Develop a social strategy, once mining has commenced, in line with the life of mine plan to assist in leaving a positive legacy. These strategies will be reviewed and monitored for implementation.	• The SEP describes the LAS in support of this SEP, which is aimed at capturing all Accountability Mechanisms that will be used to engage and inform external stakeholders. It furthermore describes the implementation, monitoring and evaluation of all engagement activities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	
			Social disruption		
552	O104	• If managed correctly, the proposed development could contribute towards improved social and physical mobility in the medium to long term, as well as a general improvement in safety and security measures. This includes policing services and patrolling by mine security personnel, as well as improved health, education and related social services, and the provision of public transport and telecommunications.	• The 2025 SLP Implementation tracker depicts the different focus areas of the LED projects, aimed at improving the social and physical *status quo*, including: o energy (solar street lights) o water and sanitation (water infrastructure) o education and skills (early childhood, learner and school development) o connectivity (internet for low income schools) o health and wellbeing (health facilities and improved health in schools).	• Mototolo Mine Complex SLP Implementation Plan 2025	
553		• Implement the Social and Labour Plan (SLP).	• Implementation of the SLP 3 is tracked via the an SLP Implementation tracker, with spreadsheets for each element of the SLP.	• Mototolo Mine Complex SLP Implementation Plan 2025	
554		• Implement Local economic development plans, which will include infrastructure and poverty eradication projects in line with the area's Integrated Development Plan.	• The SLP 3 addresses infrastructure and poverty eradication projects that the mine will undertake in line with the IDP. • The 2025 SLP Implementation tracker also track implementation of these LED projects, which includes infrastructure and local upliftment.	• Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited • Mototolo Mine Complex SLP Implementation Plan 2025	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Generation of jobs		
555	**O105**	• It is expected that contractors will bring in their own workers with the required core skills. The revised SLP will reflect the levels of local employment that will be required. Contractors must submit annual reports on how they are attaining these targets as part of AAP's reporting to Government. Where it is not possible to meet targets for employing people from the immediately affected areas, contractors will be required to source personnel in the immediate focus area, and then only in the broader focus area. Potential workers in the local area will be assessed for their suitability for contract work at Der Brochen. Dover tests can be conducted to screen potential local contract workers.	• The revised SLP 4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	
556		• AAP will investigate the potential and applicability of training local contract workers on theoretical and safety aspects of pit mining at its facility in Mogalakwena. The Mogalakwena pit is much larger than the proposed pit at Der Brochen, and different methods and machinery may be employed at the two mines. At this point, it is unclear what machine-specific skills will be required by contractors working at Der Brochen.	• No open pit mining is undertaken at the Mototolo Mine Complex. • Conditions related to Der Brochen are audited separately in the 2019 external EMPr audit.	• Site audit observations (24-26/06/25)	N/A
557		• A database of trained potential local workers will be generated and provided to contractors to consider for employment. Local contract workers will be registered on the AAP database so that they may have access to other employment options in AAP and other companies AAP shares its database with.	• The 2025 SLP Implementation tracker details and tracks supplier development, which includes: o local supplier gap analysis o courses for local suppliers o supplier development partners o training of local suppliers o beneficiaries graduating from the bespoke support programme. • RPM maintains a supplier/vendor database.	• Mototolo Mine Complex SLP Implementation Plan 2025	
558		• AAP also provides learnerships and bursaries in engineering and hospitality and will implement this programme in the operation's local communities. Upskilling particularly of contract workers from the local area will be undertaken by AAP during the Operational Phase of operation.	• The 2025 SLP Implementation tracker shows the number of learnerships and bursaries for employees, as well as the learnerships, cadet ships and bursaries for the local communities during 2021-2025. • Contractor upskilling will be tracked once the Der Brochen Mine is operational.	• Mototolo Mine Complex SLP Implementation Plan 2025	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
559	O105	• Procedures for employing locals will be discussed and agreed with the Community Engagement Forum (CEF). Existing fora will be used to implement AAP's local recruitment process, to communicate the recruitment process and to identify and recruit suitable candidates.	• The RPM Mototolo Mine Contractor Recruitment Process outlines their local recruitment process. • The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• RPM Mototolo Mine Contractor Recruitment Process • Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	
560		• AAP will meet the SLP requirements and commitments for downscaling and retrenchments, including the establishment, implementation and monitoring of a Future Forum.	• The 2025 SLP Implementation tracker states that: '*Future Forum has been established with the Constitution signed. With the P950 we have held session with labour representatives. Any decision for downscaling will be announced by Corporate and lead with assistance of the Corporate ER team. Operation will only facilitate operation task teams as each business has its own operation design. Budget and allocated funding are dependent on the scale of downscaling. Budget for portable skills will be dependent on agreement with labour representatives*.'	• Mototolo Mine Complex SLP Implementation Plan 2025	
Procurement of goods and services					
561	O106	• The operation will inject investment into the local and regional economy through the employment of labour, use of local support services and the use of local infrastructure. The operation will ensure that as much of this as possible is directed to the local economy. Since it is unlikely that suppliers from within the study area (local level) will be suitable, goods should be preferentially procured in the immediate focus area and, if unsuccessful, only then in the broader focus area.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	
562		• AAP will inform businesses through appropriate business fora about available opportunities and how business may access these. The Steelpoort Business Forum will be used to engage with businesses in the local and regional areas.	• The SEP describes the process of consolidating recruitment forums into clusters, by the SP team, with clustered forums from both FTLM and TCLM, being engaged.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	
563		• The revised SLP should reflect the targets for procuring goods locally and regionally, and to develop local suppliers. Contractors will be required to submit annual reports on how they are attaining these targets as part of AAP's SLP reporting to Government.	• The revised SLP 4 has not been finalised, but this condition is noted. • The 2025 SLP Implementation tracker includes 2025 Local Procurement Targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
564	O106	• AAP will identify potential service providers for longer term procurement. AAP will advise and support these companies using Zimele Hub and other AAP institutions so that they can be incorporated as long term suppliers.	• The 2025 SLP Implementation tracker lists Zimele as responsible for supplier development (including company assessments and training of local suppliers), enterprise development and youth development.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
565		• According to the Anglo Social Way, all AAP mines are now required to develop long term strategies so that when the mine closes, the mine leaves a positive legacy where mine communities continue to be economically and socially sustainable. These strategies will be reviewed and monitored for implementation.	• The SEP describes the LAS in support of this SEP, which is aimed at capturing all Accountability Mechanisms that will be used to engage and inform external stakeholders. It furthermore describes the implementation, monitoring and evaluation of all engagement activities.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
			Influx of employees		
566	O107	• Enhance employment of people and procurement of service providers in the study area and the region.	• 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.	• RPM Mototolo Mine Contractor Recruitment Process	☑
567		• Accommodation should preferably be provided in towns in close proximity to the project area and workers bussed in.	• The SLP 3 describes their commitment for their Housing and living conditions to meet the requirements of Regulation 46c (i) of the revised Housing and Living Conditions Standard for the Minerals Industry (published in the Government Gazette on 11 December 2019), providing either a LOA or Single accommodation villages. • There is no contractor accommodation on site.	• Mototolo Der Brochen Mine Complex Social and Labour Plan 2021-2025, Anglo American Platinum Limited	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
568	O107	• Should accommodation be required in close proximity to Der Brochen: o RPM should require the contractors to promote HIV/AIDS prevention amongst employees. o RPM and the contractors should work with the health authorities to provide HIV/AIDS prevention and treatment interventions in a culturally appropriate manner. AAP will confirm if this is possible. o Sub-contractors should adhere to the contract with the contractor.	• All contractors are responsible for arranging their own accommodation.	• Site audit observations and interviews (24-26/06/25)	N/A
569		• A strategy and protocol for camp management should be developed and implemented, should an existing worker accommodation facility be used.	• There are no contractor's camps at the Mototolo Mine Complex.	• Site audit observations and interviews (24-26/06/25)	N/A
Collection of medicinal plants during the Operational Phase					
570	O108	• A land access protocol for visiting graves is currently in place and AAP Land Use Management will explore the possibility of extending this protocol for enabling the collection of medicinal plants on the property.	• Medicinal plants were rescued by Agreenco from several of the Mototolo Mine Complex development footprints and relocated to the Mareesburg Nursery. • No evidence has however been provided of community access to medicinal plants prior to clearing of the current construction areas, namely the DB North footprint and the MTSF Phase 4 footprints.	• Document review	✗
Table 9-16: Management measures in respect of the operation of the Borwa and Lebowa shafts and associated ventilation shafts					
Geology					
Loss of a natural resource					
571	O109	• The mine is continuing to mine in accordance with its extraction plan by leaving in situ pillars o If any infrastructure is to be considered it will be ensured that it is not located where future mineral resources will be sterilized.	• RPM employs the bord-and-pillar mining method at both the existing Lebowa and Borwa decline shafts. • No new infrastructure is current planned at either shaft, but this condition is noted by the Mototolo Mine Complex.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021)	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Topography					
Alteration of the natural topography and drainage					
572		• Ensure the ventilation shafts constructed as per design.	• The ventilation shafts were constructed as part of the Xstrata Thorncliffe mine, prior to the Mototolo JV, and it is thus assumed designs would have been signed off by an engineer and issued for construction. • The 2024 external EMPr Compliance Audit also states that: '*Ventilation Shafts were constructed as per the designs*.'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • Photo 57 - Lebowa shaft ventilation shaft	
573	**O110**	• Mine management will ensure that rehabilitation does occur according to the mining plan, concurrent with the mining operations.	• The latest 2024 Closure Plan states that: o '*Lebowa Shaft may close by 2027 unless studies confirm safe mining through St. George's Fault.* o *Borwa Shaft will operate until 2046, allowing phased rehabilitation.*' • The following opportunities for concurrent rehabilitation are identified in the Closure Plan: o '*Lebowa Shaft: Options include repurposing surface infrastructure or using the shaft as an emergency escape route. Related ventilation shafts may be added to the concurrent rehabilitation plan. Decommission and rehabilitate after 2027, with progressive rehabilitation of non-essential infrastructure as operations scale down.* o *Borwa Shaft will operate until 2046, allowing phased rehabilitation. Decommission and rehabilitate after 2046. Implement progressive backfilling and contouring*.'	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
574		• An annual audit will also be performed to monitor the progress of rehabilitation to ensure that large voids and stockpiles are not created unnecessarily.	• The Closure Plan and the Rehabilitation Strategy and Implementation Plan (RSIP) are updated on an annual basis. • Annual external EMPr compliance audits are furthermore undertaken, which include the assessment of rehabilitation conditions.	• Borwa and Lebowa Shafts Rehabilitation Strategy and Implementation Plan Update for 2024, EnviroGistics (Apr 2025)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Soils					
Degradation (chemical, biological & physical properties) due to removal and stockpiling					
575	**O111**	• Visually inspect the terrain for signs of erosion and stability of surface run-off control structures (Note to be monitored during scheduled inspections and/or after every severe storm event).	• The Environmental Officer conducts monthly inspection, which include signs of erosion and the status of the surface water management infrastructure. • Areas of non-compliance are: o Borwa Shaft: rehabilitation of the borrow pit (*SIB project commenced*), lining of the dirty water channel, erosion repair along the access road, repair of the wash bay bund wall, implementation of the stormwater management infrastructure upgrades o Lebowa shaft: erosion along the stormwater outlet, implementation of the stormwater management infrastructure upgrades.	• Photo 58 - erosion at the Lebowa shaft stormwater outlet	
576		• Usable soil for the purposes of rehabilitation will be stripped from areas to be cleared for construction and operation and stored in designated soil stockpiles.	• No topsoil stockpiles were observed on site. • The 2024 external audit confirms: '*No topsoil stockpiles are present on site*.'	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	
577		• Stripped soil will be stockpiled and stored using the following conservation principles: o soil will be stockpiled by means of end-tipping to avoid compaction; o stockpile areas will have their soils stripped to conserve the seed bank; o single handling will be practiced; o stockpiles that are likely to remain unused for more than 12 months will be revegetated to manage dust and erosion and to maintain the soil's viability (further principles regarding rehabilitation will be contained in the soil utilisation plan; o usable soils will be re-spread with a minimum of compaction; o land to which soil has been reapplied will be revegetated.	• The Scope of Work for the upgrade of the Lebowa Shaft northern sump, includes: o '*Clear vegetation and trees for the re-alignment of Berm C4. Do not remove protected or other indicated trees or vegetation;* o *Remove all vegetation and topsoil on the channel alignment and temporarily stockpile on a designated area near the construction site. Use the material after backfilling and replace topsoil and establish vegetation next to the channel*.' • EMPr conditions are required to be implemented. • Any clearing for implementation of the additional Lebowa and Borwa shaft stormwater management measures, are also required to comply with the EMPr conditions.	• Mototolo Complex: Lebowa Mine - Update of the Storm Water Management Plan Northern Sump Scope of Work, RPM (Jul 2025)	
578		• Stockpiles and newly spread soil will be kept clear of invasive vegetation.			

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
579	O111	• Minimise the area to be cleared that is safe for construction and operation activities, thereby minimising the disturbed footprint and its vulnerability to erosion, pollution of storm water and dust generation.	• The areas to be cleared for the upgrade of the Lebowa Shaft northern sump, and the upgrade of the stormwater management measures at both the Lebowa and Borwa shafts, should be pegged prior to clearing to comply with this condition.		
580		• Areas to be disturbed will be cleared as close to the start of construction as possible so that bare areas are not left exposed for long periods of time.	• This should be coordinated between the Environmental Officer and Redco.		
581		• Rehabilitation will be progressive throughout the life of mine and will commence as soon as the disturbing activity has ceased.	• Post site audit clarifications confirmed that no rehabilitation took place during the audit period. • The 2024 Closure Plan also only schedules concurrent rehabilitation opportunities at Lebowa shaft in 2027 and Borwa shaft post 2046. • The 2025 IWWMP states that: '*The decommissioned ventilation shafts near the Borwa Shaft area should be rehabilitated*.'	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024) • Mototolo Mine: Borwa and Lebowa Shafts Integrated Water and Waste Management Plan Update, 2024, EnviroGistics (Jun 2025)	
582		• Roads to be constructed as part of the mine will be designed and built to minimise erosion.	• The roads accessed during the audit did not show signs of significant erosion, though not all roads were visited.	• Site audit observation (24/06/25)	
583		• Prevent contamination of soils due to leaching of contaminants from the mine residue deposits and plant area during operation and decommissioning.	• There are no WRDs nor plants associated with either the Lebowa or Borwa shafts.	• Site audit observation (24/06/25)	
584		• Exposed soil shall be rehabilitated with a mixture of local grasses.	• No areas of exposed soil was observed during the audit and there are currently no topsoil stockpiles at either of the shafts. • As stated previously, if area are cleared for implementation of the any of the Lebowa and Borwa shaft stormwater management measures, the soil management conditions will require implementation and compliance.	• Site audit observation (24/06/25) • Mototolo Complex: Lebowa Mine - Update of the Storm Water Management Plan Northern Sump Scope of Work, RPM (Jul 2025)	
585		• The soil must be used for rehabilitation as soon as practicable.			
586		• Soil shall only be used for rehabilitation purposes and not for other uses for example construction of roads.			
587		• Contour structures should be made on slopes > 14º and slope length of more than 5 m.			

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
588	**O111**	• The storm water management infrastructure will be inspected on a monthly basis as well as after storms. Any debris blocking drainage canals will be removed and any damaged sections repaired.	• The Environmental Officers undertake monthly inspections at the shafts, which include the stormwater management infrastructure. • The 2025 IWWMP however still includes the outstanding action: '*Develop a planned maintenance programme for all stormwater infrastructure*.' • Non-compliances were also observed, as reported in previous internal and external compliance audits, with the channels and drains at both shafts' workshops are very shallow, damaged and filled with silt and litter, with overflows observed.	• Site audit observation (24/06/25) • Mototolo Mine: Borwa and Lebowa Shafts Integrated Water and Waste Management Plan Update, 2024, EnviroGistics (Jun 2025) • Photo 59-60 - Borwa shaft damaged and sited workshop drains and sump at the diesel storage area • Photo 61-62 - Lebowa shaft damaged and silted channels and drains, with debris and overflows	✗
589		• Stockpiles shall be kept wet to prevent fine particles from being removed by wind to the surrounding area.	• There are currently no topsoil stockpiles at either of the shafts. • No evidence of wet suppression was observed at the ROM stockpiles, however no dust issues were observed either. • The latest 2025 DFO monitoring reports for the Mototolo Mine showed that monitoring results were compliant with the Non-Residential standard in all single dust buckets surrounding the Mine.	• Site audit observation (24/06/25) • Air Quality Monitoring for Mototolo Mine: April 2025 (GCS, 28/05/25) • Photo 63 - Mototolo Mine DFO monitoring locations	✓
Pollution of soil by chromite particles, oils, diesel and other wastes or cleaning materials					
590	**O112**	• The mine's waste management procedure shall be reviewed annually to include recent changes. Specific reference shall be made to disposal of domestic waste, and hazardous waste and management of contractors.	• The Mototolo Waste Management Procedure states that: o '*It is the responsibility of the Review Committee to ensure that this procedure is reviewed as per the review schedule or in the event that any non-conformance or incident may contribute to the improvement of the processes set out in this procedure*.' • The version received by the auditor is dated 14/06/2024, with the history of changes showing the document reviewed on 11/09/2023 27/01/2023 and 08/02/2022, thus more than annually. • The Procedure describes the storage, separation, sorting and transportation of all waste types off site, and refers to contractors on site, as well as the waste management contractor responsibilities.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 64 - Borwa shaft waste management • Photo 65 - Lebowa shaft waste management • Waste Recon: Mototolo - Lebowa, Waste Legends, 2025	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
591	O112	• Oil, petrol and other chemicals will be disposed of hazardous waste and not with domestic waste.	• The Procedure describes oils and redundant chemicals as '*Other wastes*', with '*Hydrocarbon contaminated material*' and '*Hazardous Waste*' listed separately. The Domestic Waste definition states '*Waste excluding hazardous waste*'. • The Sorting section of the Procedure states: '*All waste will be disposed into colour coded wheelie bins and hazardous waste will be disposed into black wheelie bins and impermeable skips with lids before transported to salvage yard/ sorting area for further sorting.*' • Bins and skips were observed at both shafts. • Proof of separate disposal of oil, hazardous and domestic waste was provided to the auditor.		☑
592		• Oil traps will be installed and maintained in the workshop areas. Particular attention will be given to training of staff and contractors in the handling of oils, diesel and other hazardous substances on site i.e. spills are to be avoided.	• Oils traps have been installed at the shafts, and a Work Order was viewed for servicing of the oil skimmer, but maintenance seems to not be done frequently, with the following non-compliances requiring addressing: o redesign of the inefficient water management systems are currently planned at both shafts, to ensure that clean and dirty water are separated and the infrastructure is compliant with Regulation 704 of the NWA o an excessive amount of water reports to the Borwa sump, causing it to overflow and be ineffective o at Lebowa, the July internal audit reported a significant oil spill at the oil separator, with the bund containing the initial volume, but it having to then be diverted via the diversion structures o a Scope of Work was also issued and designs completed by Redco, to improve water management at Lebowa shaft and reduce the current risk of overloading the oil separator and the downstream system including the northern sump. • Extensive hydrocarbon spills were observed at the TMM workshop areas at both shafts, specifically at the refuelling areas, which has also been reported in various internal and external audits during 2024-2025.	• Photo 66 - Borwa shaft hydrocarbon spills • Photo 67 - Lebowa shaft hydrocarbon spills • Environmental compliance inspection, Lebowa Shaft, Sharron Mkhabela (17/07/25) • Mototolo Complex: Lebowa Mine - Update of the Storm Water Management Plan Northern Sump Scope of Work, RPM (Jul 2025)	☒
593		• Surface water draining off contaminated areas containing oil and petrol should be channelled towards a sump to separate hydrocarbons and water. The sumps must be cleaned out regularly to ensure its proper functioning.			☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
594	O112	• Construction vehicles and machines must be maintained properly to ensure that oil spillages are kept at a minimum. Oil residue shall be treated with oil absorbent such as Drizit, and removed to an approved waste site. Spill kits must be easily accessible. Old oil to be stored in dedicated area to prevent pollution and recycled via oil recycling companies.	• None of the parked vehicles had drip trays underneath at either of the shafts and leaks were observed. • Leaking vehicles have also been reported in previous internal and external compliance audits during 2024-2025. • Spill kits were observed at the workshops, though the Borwa shaft spill kits are not labelled. • Though oil was mostly stored in the designate oil bays, significant oil spills were observed at the shafts, with no evidence of clean-up using oil absorbents.	• Photo 59 - Borwa shaft: equipment at workshop with no drip tray and spill underneath • Photo 67 - Lebowa shaft: equipment parked with no drip trays and visible leaks • Photo 68 - unlabelled spill kits at Borwa shaft workshop	
Land Capability					
Loss of agricultural land					
595	O113	• Disturbed land will be rehabilitated as soon as the activities have ceased.	• Post site audit clarifications confirmed that no rehabilitation took place during the audit period. • The 2025 IWWMP identified various areas available for rehabilitation at the shafts: o Borwa shaft borrow pit (*SIB project commenced*) o Borwa shaft decommissioned ventilation shafts o prospecting roads and disturbed footprints at both shafts o ventilation shafts at Lebowa shaft, based on the imminent closure of the shaft.	• Mototolo Mine: Borwa and Lebowa Shafts Integrated Water and Waste Management Plan Update, 2024, EnviroGistics (Jun 2025)	
596		• The rehabilitation plan will be updated by the mine to reflect changes and closure objectives.	• The Closure Plan and the Rehabilitation Strategy and Implementation Plan (RSIP) are updated on an annual basis.	• Borwa and Lebowa Shafts Rehabilitation Strategy and Implementation Plan Update for 2024, EnviroGistics (Apr 2025)	
Flora					
Loss of conservation important plant taxa					
597	O114	• Disturbed areas will be rehabilitated as soon as possible in accordance with the rehabilitation principles of the mine.	• Post site audit clarifications confirmed that no rehabilitation took place during the audit period.	• Post site audit clarifications	
598		• Red data or protected species (All protocols and Acts) must be removed where possible and where not possible must a permit be obtained from the competent authority to remove/destroy it.	• The document review indicates that new areas will be cleared for the upgrade of the Lebowa Shaft northern sump, and the upgrade of the stormwater management measures at both the Lebowa and Borwa shafts.	• Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020) - *to be updated to include the new shaft areas to be cleared*	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
599	O114	• Ensure the natural vegetation cover between the sections receives the highest level of protection to ensure proper plant material remains.	• As per the current protocols at the Mototolo Mine Complex (2020 Master Plan), the required areas should be pegged, surveyed by a specialist, permits acquired for any SCI, and the protected plants and trees and/or cuttings and seeds thereof, relocated to the Mareesburg nursery or a suitable habitat. • A permit was obtained for the transplant of *Sclerocarya birrea subsp. caffra* (Marula) for the construction of a parking area at Thorncliffe 374 KT Farm.	• Licence LP-SDM-0207-2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 3 Mar 2025 to 3 Mar 2026, DFFE (03/03/25)	
600		• An invasive and alien control programme must be drafted and implemented by the SHEQ department. All illegal exotic or invader plants and weeds shall be eradicated as required in terms of Regulation 15 & 16 of the Act on Conservation of Agricultural Resources, 1983 (Act no. 43 of 1983) which list these plants.	• The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • The Environmental Specialist confirmed that AIP removal took place in Feb 2025 at both shafts. • AIP eradication is done twice a year at the shafts in Feb and Nov.	• Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (27/05/2022) • Post site audit clarifications	
601		• Awareness program to all staff must include alien and exotic species identification (species expected on this site only) and eradication measures.	• Every monthly environmental talk topic discusses a different environmental issue, which has included AIP.	• Mototolo mine Environmental Talk Topic: Jan 2025, Feb 2025, Mar 2025 and Jun 2025	
602		• Raise awareness amongst employees by the compilation and onsite posters indicating the names and photos of red data species found on site.	• Signage of Red Data Species are displayed at both shafts.	• Post site audit clarifications • Photo 89 - Reda Data Species signage at both shafts	
603		• The re-vegetation of the disturbed areas will become an integral part of activities during the operational phase.	• No rehabilitation has been undertaken during the audit period, with an SIB project underway to rehabilitate the Borwa borrow pit.	• Post site audit clarifications	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
604	**O114**	• The areas where the buildings and plant area are situated will only be revegetated once the buildings have been removed during the decommissioning phase.	• The latest 2024 Closure Plan confirms that: o '*Lebowa Shaft: Options include repurposing surface infrastructure or using the shaft as an emergency escape route. Related ventilation shafts may be added to the concurrent rehabilitation plan. Decommission and rehabilitate after 2027, with progressive rehabilitation of non-essential infrastructure as operations scale down.* o *Borwa Shaft will operate until 2046, allowing phased rehabilitation. Decommission and rehabilitate after 2046. Implement progressive backfilling and contouring*.'	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024)	
605		• Existing invasive plants will be removed and the mine property will be surveyed at least once a year to check for the return of any new alien invaders. The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) hold landowners legally responsible for the control of invasive alien plants on their properties.	• The Environmental Specialist confirmed that AIP removal took place in Feb 2025 at both shafts. • AIP eradication is done twice a year at the shafts in Feb and Nov.	• Post site audit clarifications	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Fauna					
Loss of habitat and fauna displacement					
606	**O115**	• Closure objectives and targets of the Biodiversity Management Plan shall be adhered to.	• The 2025 Closure Plan states that: o '*Anglo American is committed to achieving Net Positive Impact (NPI) on biodiversity across its operations by 2030. At the Mototolo Complex, this involves minimising the operational footprint while enhancing ecological resilience and creating nature-positive outcomes for host communities and stakeholders. Integrating biodiversity considerations into mine closure planning is essential to ensuring long-term environmental sustainability and community well-being*.' • The 2023 BAP was developed for Der Brochen, covering the full Mototolo Mine Complex MRA, including the two shafts, but no evidence of implementation of the BAP's action plans and activities, or monitoring of these, were provided, nor if/how the three natural management units (*Management unit 1: Sekhukhune Mountain Bushveld Habitat; Management unit 2: Montane Grasslands Habitat and Management unit 3: Freshwater Habitat*) are being managed.	• Der Brochen Biodiversity Action Plan, SAS (Jan 23)	
607		• Re-establish proper specie diverse vegetation cover as soon as possible on rehabilitated areas and bare patches as preventative measurement against erosion, invader specie control and where soil stability is required.	• No rehabilitation has been undertaken during the audit period, with an SIB project currently underway to rehabilitate the Borwa borrow pit. As no plant rescues were undertaken from the shafts' footprints, it is uncertain which species will be included in the revegetation portion of the rehabilitation. No evidence of plant surveys on the shaft footprints are available. • The specialist studies attached to the 2021 EMPr were all completed in 2014 and did not cover the shafts, as they were still owned by Glencore (*who obtained the Xstrata Thorncliffe Mine in 2013*).	• Post site audit clarifications	
608		• Where breeding areas of protected and red data bird and bat species are found, the necessary warning signs must be erected.	• No signage of red data faunal species' breeding areas were observed on site.	• Site audit observations	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
609	O115	• Killings etc. must be reported in the incident register.	• The Mototolo Incident Register for 2024-2025 was provided to the auditor and includes water-related incidents related to both shafts. • The Mototolo Mine Complex is aware of this condition to report and faunal killings.	• Mototolo Complex Environmental Incident Register, 2024-2025	☑
610		• Game catching, hunting, traps, snares, poaching and any other unnecessary disturbance of animals inside the boundaries of the operation must be a disciplinary offence.	• The Environmental Inductions state that harming of faunal species are prohibited.	• Post site audit clarifications	☑
611		• Machine operators and drivers to undergo appropriate level of environmental impact training to ensure they understand their impact on the environment.	• Equipment operators and machine drivers obtain the applicable permits, licences and training to safely operate specific construction vehicles. • All contractors and employees attend the Mototolo Mine Complex SHEQ Induction prior to commencing work on site. • The Environmental Officer also advises the contractors about the various applicable procedures on site.	• Site interviews (24/06/25) • Review of slides from the Mototolo Complex SHEQ Induction	☑
612		• Implement Environmental Awareness program.	• Every monthly environmental talk topic discusses a different environmental issue, as part of the Environmental Awareness Programme on site.	• Mototolo mine Environmental Talk Topic: Jan 2025, Feb 2025, Mar 2025 and Jun 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Surface water					
Water quality deterioration due to site clearance and uncontrolled release of storm water					
Water quality deterioration due to vehicle maintenance, hydrocarbons, fuel, oil and lubricants					
613	**O116 and O117**	• In principle the mine will not discharge any water into drainage courses, except where the 1:50 year flood event has been exceeded.	• Incidents of overflows were reported during the audit period, at both of the shafts' PCDs, all related to flood events due to excessive rainfall: o Borwa shaft (20/12/24 and 07/01/25): reported to DWS on 20/12/25: '*Upon routine inspection and visual monitoring of dam levels, it was observed that the Borwa Shaft stormwater dam (referenced as the Mototolo South Shaft stormwater dam in Water Use Licence 06/B41G/IACGJ/8944, Issued in 2019), had elevated levels. Despite immediate mitigation measures implemented as outlined below, the dam started to discharge on the morning of the 20th Dec 2024.*' o The DWS Incident Notification of 20/12/24 states that the initial root causes were: - '*1:100 year flood event occurred at the Mototolo Complex on the 10th November 2024, where 112 mm of rainfall was received within a 4.5 hour period.* - *The site has since struggled to keep dam levels within operating levels.* - *Further rainfall events occurred, with the most recent event occurring on the evening of the 19th December 2024 measuring 60 mm.*' o Lebowa shaft (09/01/25): reported to DWS on 20/12/24 as: '*…currently experiencing significantly high dam levels and the site is actively trying to mitigate the risk of overflows: Lebowa Shaft stormwater dam.*' and on 10/01/25 as follows: '*Lebowa Shaft stormwater dam (referenced as the Mototolo South Shaft stormwater dam in Water Use Licence 06/B41G/IACGJ/8944, issued in 2019) has been experiencing significantly high dam levels and the site was actively trying various measures to mitigate the risk of overflows. As a results of continuous rainfall, the PCD started overflowing in the morning of 9 Jan 2025.*'	• SHE/2024/985, RE: Incident Notification, AAP (20/12/24)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
614	O116 and O117	• Rainfall on site shall be recorded and archived storm water design should be according to the Redco Report - Mototolo Mine Surface Water Planning.	• Rainfall is recorded at the Mototolo Mine Complex with the Annual Mine Water Balances Updates for both shafts showing Site Rainfall and the GCS Water Monitoring Reports indicating monthly rainfall on the analysis graphs. • Redco has compiled new Stormwater Management Infrastructure designs for both shafts.	• Mine Water Balance: Borwa Shaft, Jones & Wagener (31/12/24) • Mine Water Balance: Lebowa Shaft, Jones & Wagener (31/12/24) • Water Quality Monitoring Report for Mototolo Mine: April 2025, GCS (28/05/25) • Lebowa Mine SWMP Update: Clean and Dirty Water Infrastructure and Existing & Proposed Infrastructure, Redco (04/07/25) • Borwa Mine SWMP Update: Clean and Dirty Water Infrastructure and Existing & Proposed Infrastructure, Redco (04/07/25)	☑
615		• The stormwater design report should be updated regularly to ensure it stays current and that the impacts to surface water resources are mitigated.	• Stormwater designs have been updated by Redco for both shafts. • Updated designs have also been completed by Redco for the stormwater system affecting the northern sump at Lebowa Shaft, and were provided to the auditor.	• Lebowa Mine SWMP Update: Clean and Dirty Water Infrastructure and Existing & Proposed Infrastructure, Redco (04/07/25) • Borwa Mine SWMP Update: Clean and Dirty Water Infrastructure and Existing & Proposed Infrastructure, Redco (04/07/25) • Mototolo Complex: Lebowa Mine - Update of the Storm Water Management Plan Northern Sump Scope of Work, RPM (Jul 2025)	☑
616		• It will be necessary to construct an additional small storm water dam to the north east of the terrain, because the terrain is situated on a local watershed and a portion of the disturbed area drain north to a different watercourse than for the main SWD.	• No additional stormwater dams have been constructed. • The 2019 WUL also only authorises one stormwater dam at each shaft. • Additional process water tanks were authorised in the 2022 WUL Amendment	• Mototolo Mine Licence No: 06/B41G/IACGJ/8944, DWS (26/04/19) • Mototolo Platinum Mine Licence No: 06/B41G/IACGJ/8944, DWS (02/08/22) • Mototolo Platinum Mine Amendment Licence No: 06/B41G/ACGI/13267, DWS (28/07/23)	☒
617		• Flow meters to be installed as indicated in the water balance diagram. Measurements shall be taken on a regular basis, archived and used to update the mine water balance. Losses through the system should be investigated.	• Flow meter readings are recorded daily, with spreadsheets of data provided to the auditor. Readings are fed into the water balance for each shaft.	• 2024 and 2025 Water Balance Borwa - Flow Meter Readings • 2024 and 2025 Water Balance Lebowa - Flow Meter Readings	☑
Contaminated storm water runoff and overtopping of containment dams - operational phase					
Stream diversions, stockpiling					
618	O118 and O119	• Effluent quality from the sewage works (north and south) shall comply with the General Standard specified by DWS.	• The June report for Lebowa shows that the ammonia nitrogen (NH_4) measured 17.4 mg/l, which is above the DWS General Standard Limit of < 6 mg/l.	• Lebowa Sewerage Treatment Works, Monthly Operations Report, Fraser Alexander (June 2025) • Fraser Alexander (Pty) Ltd: Lebowa Sewage Treatment Plant: Certificate of Analysis, A.L. Abbott & Associates (Pty) Ltd (13/06/25)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
619	**O118 and O119**	• Operational and Maintenance plan and schedule for management of sewage facilities should be compiled. An emergency plan should be compiled to deal with system failures and should also include a down-stream notification procedure.	• Monthly Operations Reports are sent to RPM, detailing the monitoring of the Lebowa and Borwa Wastewater Treatment Plants (WWTPs), detailing: o any outstanding maintenance issues o any plant maintenance conducted during the month o operational matters o the raw samples and effluent quality analysis results o recommendations regarding plant maintenance.	• Lebowa Sewerage Treatment Works, Monthly Operations Report, Fraser Alexander (Jun 2025)	☑
620		• The sewerage plants shall be operated by a competent person who received the necessary training.	• The sewage treatment plants are owned and operated by Fraser Alexander, who specialise in effluent treatment solutions.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov 2024) • Photo 69 - Borwa STP • Photo 70 - Lebowa STP	☑
621		• Routine checks should be done on all mechanical instruments for problems such as leaks, overheating, vibration, noise or any other abnormalities. All equipment should be free of obstruction, be properly aligned and be moving at normal speed. Mechanical maintenance must be according to the manufacturer's instructions.	• The June Monthly Operations Report lists the scope of work (daily monitoring) as: o '*Daily removal of screenings from screens.* o *The plant is being monitored and checked to ensure that the treatment process is effective.* o *The Compressed air is being monitored to ensure effective biological treatment.* o *Activated sludge recycling is being monitored to ensure effective treatment.* o *Chlorine is dosed and monitored for residual chlorine for disinfection.* o *Recording onsite data and reporting any defects.* o *Sampling is done monthly on effluent*.'	• Lebowa Sewerage Treatment Works, Monthly Operations Report, Fraser Alexander (Jun 2025)	☑
622		• Pumps should be checked for excessive noise, vibration, overheating and leaks.			☑
623		• Surface water analysis will be reported in the annual report to DWS.	• GCS conducts monthly surface water monitoring at the Mototolo Mine. • Proof of submission of the six-monthly and annual water monitoring reports were provided to the auditor.	• Water Quality Monitoring Report for Mototolo Mine: December 2024 Annual Report/Fourth Quarter, GCS (11/02/25) • Photo 71 - Mototolo Mine water monitoring locations • SHE/2024/648: RE: Submission of six-monthly monitoring report for Mototolo Mine, AAP (22/08/24)	☑
624		• Any spillages on site will be reported in the quarterly report to DWS detailing corrective actions taken.	• Incidents of overflows were reported during the audit period, at both of the shafts' PCDs, all related to flood events due to excessive rainfall. • The incidents were reported via email and formal letters to DWS listing the corrective actions.	• SHE/2024/985, RE: Incident Notification, AAP (20/12/24)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Groundwater					
Deterioration of groundwater quality due to blasting explosive residue					
625	**O120**	• Groundwater inflows from both shafts shall be monitored - flow meters to be installed as detailed in the water balance diagram, data archived and used to update the water balance on a monthly basis.	• Flow meter readings are recorded daily, with spreadsheets of data provided to the auditor. Readings are fed into the water balance for each shaft.	• 2024 and 2025 Water Balance Borwa - Flow Meter Readings • 2024 and 2025 Water Balance Lebowa - Flow Meter Readings	☑
Deterioration of groundwater quality due to infiltration of contaminated runoff and seepage from residue area					
626		• A monitoring protocol should be compiled and implemented.	• Static groundwater level measurements are taken at each monitoring borehole monthly at both Borwa and Lebowa Shafts. • Groundwater quality samples are taken monthly at some boreholes and quarterly at others, based on GCS's scope of work.	• Water Quality Monitoring Report for Mototolo Mine: December 2024 Annual Report/Fourth Quarter, GCS (11/02/25) • Photo 71 - Mototolo Mine water monitoring locations	☑
627	**O121**	• If an incident occurs where water has been contaminated to levels exceeding the maximum acceptable levels agreed to by DWS, RPM will immediately notify the Regional director of DWS. The source of the contamination will be identified and measures will be implemented to prevent further contamination.	• The 2024 Annual GCS Report states that: o '*Borwa Shaft: Boreholes BHMS2, BHMS3, BHMS4, BHMS5, BHMS6, BHMS7 and BHMS8 indicated non-compliant water quality when compared to WUL Requirements, consistently throughout 2024.* o *Lebowa Shaft: Boreholes BHMN4, BHMN5, BHMN6 and BHMN7 indicated non-compliant water quality consistently throughout 2024 when compared to the WUL Requirements.* o *Options for mitigation or remediation measures should be prioritized at BHMS3, BHMS7 and BHMS8 at Borwa Shaft as well as BHMN4 and BHMN5 at Lebowa Shaft, which will reduce the majority of Mototolo Mine's collective impact.* o *All contaminated water generated should be contained within the Mining Right Area in appropriately lined waste storage facilities*.' • The Apr 2025 GCS Report indicated non-compliances at Borwa (BHMS3) and Lebowa (BHMN4), when compared to the WUL Requirements, with typically high nitrate concentrations evident . • No evidence was provided of reporting of any incidents related to groundwater contamination at the shafts, nor of the implementation of management measures.	• Water Quality Monitoring Report for Mototolo Mine: December 2024 Annual Report/Fourth Quarter, GCS (11/02/25) • Water Quality Monitoring Report for Mototolo Mine: April 2025, GCS (28/05/25)	☒

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
			Dewatering of the aquifer		
628	**O122**	• Any losses detected shall be investigated.	• The 2024 Annual GCS Report states that: o *'Borwa Shaft: Most boreholes showed no significant change in water levels during the monitoring period (<2 m) except for BHMS4 which indicated possible intermittent influence from localised abstraction near the borehole.* o *Lebowa Shaft: Boreholes in this area indicated a decrease in water levels (<1.2 m), however, a slight increase was observed in November 2024.* o *It is proposed that a numerical groundwater flow and transport model be developed/updated to simulate the groundwater flow field, verify dewatering impacts and NO_3 plume movement towards receivers in the various areas. The modelling tool can further be used to investigate mitigation measures with the aim to decrease the salt load and NO_3 load from the operations.*' • The Apr 2025 GCS Reports concluded: o *'Borwa Shaft: Predominantly all boreholes indicated a decrease in water levels during the Apr 2025 event.* o *Lebowa Shaft: All boreholes indicated a decrease in water level during the Apr 2025 measurement event.*' • The latest 2025 Delta-H report states that: '*groundwater levels at the shafts suggest steady state conditions with seasonal, with clear higher levels observed during the summer months of 2023 and 2024…with lowering of water levels following these events.*'	• Water Quality Monitoring Report for Mototolo Mine: December 2024 Annual Report/Fourth Quarter, GCS (11/02/25) • Water Quality Monitoring Report for Mototolo Mine: April 2025, GCS (28/05/25) • Update of the 2024 Mototolo Mine Groundwater Model, Delta-H (Mar 2025)	☑
629		• Water from underground shall be re-used and not discharged.	• The Mototolo Mine operates a closed water circuit.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
			Air Quality		
			Impact of mining operations on ambient air quality		
630	**O123**	• Unpaved roads will be maintained and dust suppressant used where necessary.	• Roads were observed to be in good condition. • The shafts' Water Balances also show water used for dust suppression.	• Site audit observations (24/06/25)	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
631	O123	• Daily inspections of plant and equipment.	• No evidence of daily inspections was received. • Servicing and maintenance of vehicles and equipment are done, in line with the OEM schedule.	• Site audit observations (24/06/25)	✗
632		• Records of dust suppression interventions.	• The shafts' Water Balances show water used for dust suppression.	• Document review	✓
633		• A dust fall out monitoring network shall be implemented.	• GCS conducts monthly DFO monitoring at 9 single dust buckets surrounding the Mototolo Mine. • The latest 2025 DFO monitoring reports for the Mototolo Mine showed that monitoring results were compliant with the Non-Residential standard in all single dust buckets surrounding the Mine.	• Air Quality Monitoring for Mototolo Mine: April 2025 (GCS, 28/05/25) • Photo 63 - Mototolo Mine DFO monitoring locations	✓
634		• Fugitive dust from roads is suppressed with water.	• Roads were observed to be in good condition. • The shafts' Water Balances also show water used for dust suppression.	• Site audit observations (24/06/25)	✓
635		• All employees working in dusty environments shall wear protective equipment.	• Signs indicating compulsory PPE (specifically dust masks) were observed on site.	• Site audit observations (24/06/25) • Photo 72 - Lebowa Shaft compulsory PPE sign	✓
636		• Employees working with dust and fumes shall receive annual health checks.	• All employees at the Mototolo Mine Complex undergo annual medicals, as part of their onboarding.	• Site audit observations (24/06/25)	✓
Noise					
Ambient noise levels to increase due to operation of vent shafts, conveyors, shafts, etc.					
637	O124	• Should construction noises become a problem, will noise generating activities for example braking of concrete, compaction, steel works and heavy vehicle transport along the access road take place during daylight hours when the ambient noise level is higher.	• The latest 2024 annual noise monitoring report recorded noise measurements at both shafts as below the SANS 10103:2008 industrial limit of 70 dBA: o Lebowa shaft: DN-L-1 (Day: 65 dBA and Night: 62 dBA) and DN-L-2 (Day: 55.1 dBA and Night: 54.8 dBA) o Borwa shaft: DN-B-1 (Day: 54.9 dBA and Night: 57.2 dBA) and DN-B-2 (Day: 56.1 dBA and Night: 54.1 dBA) • Readings at the closest sensitive receptors east and west of the shafts, were all below the residential SANS 10103:2008 limits during the day (<55 dBA) and night (< 45 dBA).	• Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24)	✓

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
	O124		• The noise report recommended that sensitive receptors DN-NSR-2 and DN-NSR-3, situated 2.5 km and 3.2 km northeast of the Lebowa shaft, be omitted from future campaigns due to conclusive evidence (site observations) that noise impacts are not linked to RPM and are due to other adjacent and nearby mining. • No construction activities are currently underway, but it is noted that the proposed stormwater management upgrades at the shafts will be conducted during daytime.		
638		• Construction equipment will be maintained in good working order. Non-compliance machinery will be removed from service until repaired.	• Vehicles and equipment are maintained at the shaft TMM workshops, in line with the OEM schedule.	• Site audit observations (24/06/25)	☑
639		• All vehicle exhaust units will be maintained in good working order. Non-compliant vehicles will be removed from service until repaired.			☑
640		• A complaints register should be in place.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• Mototolo Complex Grievance Register, 2025	☑
641		• All complaints, solutions and agreements between the mine and complaining parties will be kept in a specific file in the Community Officers office.			☑
642		• Noise level readings will be performed on a continual basis at the plant, underground and on mobile machinery. Note is made of any employees not using the hearing protection (earplugs) provided by the mine. Any unacceptable noise levels are assessed by the safety manager and rectified.	• The latest 2024 annual noise monitoring report recorded noise measurements at both shafts and the surrounding sensitive receptors, with all readings being below the SANS 10103:2008 industrial and residential limits. • Compulsory PPE signs, specifically for hearing protection is displayed on site, as required.	• Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24) • Photo 72 - Lebowa Shaft compulsory PPE sign	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Cultural Heritage					
Destruction of archaeological sites and graves					
643	**O125**	Heritage resources occur within the proposed project areas and the following recommendations are made based on general observations: • The remains of a Historical Period homestead (EXIGO-TH374-HP01) and a large Historical Period settlement area (EXIGO-TH374-HP02, EXIGO-TH374- HP03) are generally of medium-low significance due to poor preservation of the sites. The sites are situated in close proximity of the proposed Borwa South Ventilation shaft access road alignment and it is recommended that the alignment of the proposed road be rerouted as to avoid impact on these sites and that any activities pertaining to the access road construction in the area be closely monitored by an ECO or heritage specialist in order to avoid any possible impact sites of significance in the area, especially previously undetected burials around homesteads. In addition, a conservation buffer zone of at least 20m should be maintained around the sites. However, should the structures be directly impacted by development activities, the sites should be documented by means of a limited Phase 2 investigation. A destruction permit from the relevant heritage resources authority (SAHRA) should be obtained subsequent to the documentation of each of the Historical period structures at the impacted sites.	• The 2021 EMPr states that: '*A Heritage Study by Mr Neels Kruger from Exigo in 2014 indicated that the area around the Borwa South shaft contains some heritage remains*.' • The two Historical Period settlement areas (HP01 and HP02) and associated upper and lower grindstones (HP03) were rated as being of medium-low significance due to poor preservation of the sites. • The coordinates in the 2021 EMPr were plotted on Google Earth and are located within the following distances from the access road to the existing Borwa Ventilation shaft: o EXIGO-TH374-HP01: 11.5 m o EXIGO-TH374-HP02: 26 m o EXIGO-TH374-HP03: 2 m • The conservation zone of 20 m around the sites, was thus not maintained for Sites HP01 and HP03.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Photo 73 - 2014 Exigo Cultural Heritage Map	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
644	O125	• Two unmarked graves (EXIGO-TH374-BP01) and a small cemetery (EXIGOTH374-BP02) carry high heritage significance at all levels for their spiritual, social and cultural values. The sites are situated in close proximity of the proposed Borwa South Ventilation shaft access road alignment and it is primarily recommended that the alignment of the road be rerouted as to avoid impact on the graves. In addition, a conservation buffer zone of at least 30m around the graves, as well as the fencing off of all cemeteries and graves are recommended. However, should the graves or the proposed 30m buffer zone inevitably be impacted in any way by the planned activities, full grave relocations are recommended for these burial grounds. This measure should be undertaken by a qualified archaeologist, and in accordance with relevant legislation and subject to any local and regional provisions and laws and by-laws pertaining to human remains. A full social consultation process should occur in conjunction with the mitigation of cemeteries and burials.	• The 2021 EMPr states that: '*As a result of the study (2014 Exigo HIA), the operation has taken reasonable measures to safely demarcate and fence off the particular areas with heritage remains to prevent unauthorised access and any possible damage/disturbance to these areas. This gives effect to the preservation and protection of the graves.*' • The graves and cemetery were plotted on Google Earth and are located within the following distances from the access road to the existing Borwa Ventilation shaft: o EXIGO-TH374-BP01: 11.5 m o EXIGO-TH374-BP02: 65 m • Site BP01 is within less than the 30 m buffer zone from the constructed access road.	• Der Brochen-Mototolo Complex Amended EMPr, SRK (May 2021) • Photo 73 - 2014 Exigo Cultural Heritage Map	
645		• It is essential that cognisance be taken of the larger archaeological landscape of the area in order to avoid the destruction of previously undetected heritage sites. Should any subsurface paleontological / archaeological / historical material and / or graves/human remains be uncovered, all activities should be suspended and the archaeological specialist should be alerted immediately.	• The Mototolo Complex has a Cultural Heritage Chance Find Procedure. • Employees and contractors also complete the Mototolo Mine Complex Cultural Heritage Employee and Contactor Induction.	• Mototolo Complex Cultural Heritage Chance Find Procedure (MOTC-ALL-SER-PRO-0004) • Mototolo Complex Cultural Heritage Employee and Contactor Induction.	
646		• It should be noted that mitigation measures are valid for the duration of the development process, and mitigation measures might have to be implemented on additional features of heritage importance not detected during this Phase 1 assessment (e.g. uncovered during the construction process).	• This condition is noted by the Mototolo Mine Complex.	• Site interviews (24/06/25)	
647		• In the event of accidental findings, all excavation shall be stopped, SAHRA and archaeologist notified.	• The construction team were advised of this condition during the Cultural Heritage Induction.	• Site interviews (24/06/25)	

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
Socio-Economic, Infrastructure					
Employment opportunities					
648	**O126**	• Ensure the complaints register is implemented and treated at the highest level.	• Mototolo Mine Complex maintains a Grievance Register. • Details of grievances and issues are captured, rated and actions tracked, including sign-off dates.	• Mototolo Complex Grievance Register, 2025	☑
649		• Ensure the SLP is implemented.	• The SLP Implementation tracker records the implementation of the SLP.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
650		• Make sure the community forums are implemented and functional.	• The SEP states the CEF is planned, but not yet formally established nor functioning. • This condition is however rated as noted, as the SP Team attends various community forums, and implements a clear communication strategy as part of its LAS.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	ⓘ
651		• Ensure all the commitment made during the consultation process are implemented or adhered to.	• The SEP describes all stakeholder communications. • Implementation of the commitment made during the consultation is tracked by the Mototolo Mine Complex SP team.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
652		• The mine will have a dedicated community liaison officer to co-ordinate communications with the surrounding interested and affected parties. The community liaison officer will: a) be sensitive to socio-economic issues; b) be experienced in community liaison; c) have good communication skills; d) have conflict management and facilitation skills, e) is fluent in the local languages.			☑
653		• The mine will participate in relevant local forums and bodies which may be established from time to time.	• The SEP states the Community Engagement Forum (CEF) is planned, but not yet formally established nor functioning. • The SP Team attends various community forums, and implements a clear communication strategy as part of its LAS.	• Mototolo Complex Stakeholder Engagement Plan 2024/2025, AAP (MOTC-ALL-SER-PLAN-0008)	☑
654		• The mine will operate in accordance with the agreed commitments in its SLP.	• The SLP Implementation Plan consists of various spreadsheets tracking the Mototolo Mine Complex's compliance with and implementation of the various SLP commitments.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
655	O126	• Local contractors are used where possible for any maintenance or services required.	• 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.	• RPM Mototolo Mine Contractor Recruitment Process	☑
656		• The mine will attempt to continue to enhance its beneficial socio-economic input into the region, especially to the local community from where the bulk of the labour force is drawn.	• The 2025 SLP Implementation tracker has a spreadsheet dedicated to LED, showing projects in different focus areas such as education and skills, employment through infrastructure, energy, water and sanitation, etc. • Another spreadsheet tracks procurement figures, including from the host community and local suppliers, against the SLP 3 targets.	• Mototolo Mine Complex SLP Implementation Plan 2025	☑
657		• The mine will continue to support the surrounding towns of the region where supplies and services are obtained.			☑
Maintenance					
Incorrect replacement leading to operational problems					
658	O127	• The only activity involved is to remove the empty plastic vessels and replace it with steel tanks.	• These conditions refer to the correct installation of new steel tanks, which replaced the old tanks. • The 2024 external audit states that the installation process of these tanks were completed.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	N/A
659		• This will be done by parking the oil truck on the existing solid refuel platform and to lift all the existing plastic containers out of the bunded area on the truck.			N/A
660		• The next step is to lift the prefabricated steel oil tanks from another vehicle which brought them from the oil supplier and to place them inside the bunded area.			N/A
661		• The next step is to couple the existing piping system onto the new tanks.			N/A

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
662	O127	• As there is no construction phase, the only activity is to test and ensure all coupling are good and that no leakages occur.	• These conditions refer to the correct installation of new steel tanks, which replaced the old tanks. • The 2024 external audit states that the installation process of these tanks were completed.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	N/A
			Spillage and lack of oil for required uses		
663	O128	• Re-order oil when a minimum level is reached and to ensure the transfer of new oil into the tank is done properly.	• Oils are re-ordered as required and delivered to site.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	✓
664		• Any accidental spillages at the refill point will be washed down to the oil skimmer where the oil is removed and the wash water recycled.	• Significant hydrocarbon spills were noted at both shafts and had not been washed down.	• Site audit observations (24/06/25)	✗
665		• Once the tanks reach as specific limit the oil supplier brings new oil by bowser and fill the tanks up.	• Oils are re-ordered as required and delivered to site.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	✓
666		• The lifting of storage vessels must be done in a safe way and any spill must be washed down to the oil skimmer unit and the wash water recycled.	• These conditions refer to the correct installation of new steel tanks, which replaced the old tanks. • The 2024 external audit states that the installation process of these tanks were completed.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	N/A
667		• Care must be taken that the bund wall and any other structure is not damaged during the refit.			N/A
668		• Proper lifting equipment and the services of a qualified rigger must be obtained to ensure the work is done with the minimum damage to any structure.			N/A
669		• Ensure the integrity of all civil structures is intact and ensure any residual oil spillages are washed down to the oil skimmer.			N/A
670	O129	• Should the mine decide to decommission these tanks will they be emptied by either using all the oil or by pumping the remaining oil into a special oil removal company.	• This condition is noted by the Mototolo Mine Complex.		ⓘ
671		• The tanks will then be decoupled from the piping system, the tanks will then be lifted out of the containment area onto trucks and will be transported to either a new site or to the workshops of the oil supplier.	• This condition is noted by the Mototolo Mine Complex.		ⓘ

#	EMPr Ref	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
672	O129	• The bunded area will be cleaned with a suitable chemical solution which is pumped to the existing oil separation facilities.	• This condition is noted by the Mototolo Mine Complex.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	
673		• The concrete structures will then be removed and the area levelled a, ameliorated and re-vegetated.	• This condition is noted by the Mototolo Mine Complex.		
674	O130	• The replacement process must be supervised by a qualified rigger and an environmental person must be present to ensure any unforeseen incident is management according to the existing emergency procedures.	• These conditions refer to the correct installation of new steel tanks, which replaced the old tanks. • The 2024 external audit states that the installation process of these tanks were completed.		N/A
675		• The success of the process must be internally audited and will be audited during the annual external audit.			N/A
676	O131	• The monthly operational statistics will report the usage of oil and this should correlate with the amount of oil purchased.	• Monthly hydrocarbon volumes received and consumed are monitored.		
677	O132	• The contractor who does the refitment needs to undergo an induction program and environmental awareness is part of this program.	• These conditions refer to the correct installation of new steel tanks, which replaced the old tanks. • The 2024 external audit states that the installation process of these tanks were completed.		N/A
678		• The COP for the handling and management of oil facilities also deals with environmental issues, emergencies and monitoring procedures.	• The Hydrocarbon Management Procedure addresses the management of oil storage facilities. • The Hydrocarbon Management Procedure also 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 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.	• 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)	

Table 4: Der Brochen-Mototolo Mine Complex IEA (Mar, 2022) Compliance Audit Results

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
IEA SITE SPECIFIC CONDITIONS					
679	**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).	• Permits were obtained for protected trees and plants on the farms Mareesburg 8 JT and Thorncliffe 374 KT. • No proof could be provided of permits for the farm Helena 6 JT.	• Licence LP - SDM - 0025 - 2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 13 May 2024 - 13 May 2025, DFFE (13/05/24) • Licence LP-SDM-0207-2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 3 Mar 2025 to 3 Mar 2026, DFFE (03/03/25)	☒
680	**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.	• Floodlines and the EIA approved boundaries are demarcated on the construction drawings and the perimeter was furthermore pegged prior to clearing - all construction activities are within the approved footprint. • Where infrastructure and activities are within the 1:100-year floodline or 100 m of ephemeral tributaries (drainage lines) of the Groot Dwars River, authorisation and/or exemption was obtained in the WULs for the Mototolo Mine Complex, including the: Concentrator PCD, Helena TSF and RWDs. • The existing Borwa Ventilation shaft access road has been constructed within less than the EMPr recommended 30 m buffer zone around graves (site BP01) and within less than the EMPr recommended buffer zone of 20 m from CH sites HP01 and HP03.	• Mareesburg Tailings Dam Phase 1 - General Arrangement, SRK (08/11/19) • Mareesburg Ph4 Tailings Dam Phase 4 Development General Site Layout, SRK (12/01/23) • Photo 73 - 2014 Exigo Cultural Heritage Map	☒
681	**3**	• Terms and conditions of the Integrated Water Use License (IWUL) obtained from the Department of Water and Sanitation (DWS) must be adhered to.	• The EMPr and WUL authorisations and conditions were/are shared with all the Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑
682	**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.	• Activities within riparian zones have been limited to those authorised in the WULs for the concentrator and related activities.	• 2025 Annual Compliance Audit: Mototolo Concentrator 2011 Water Use Licence - Licence Number: 24072959, J9 (03/10/25)	☑

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
683	5	• Rehabilitation of the environment affected by any activities undertaken must be committed on the approved EMPR.	• The consolidated beach platform of the HTSF was revegetated and some of the starter wall and side walls. Revegetation trials are currently underway for the side slopes of the HTSF. • Only the Phase 1 embankment of the MTSF was covered with topsoil and seeded; none of the other slopes have been rehabilitated. • No rehabilitation has been undertaken during the audit period at the Lebowa and Borwa shaft areas, nor at the Der Brochen North footprint. An SIB project is currently underway to rehabilitate the Borwa borrow pit.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Site audit observations (24-26/06/25) • Post site audit clarifications	
Annexure 2					
Departmental Standard Conditions					
1. Scope of Authorisation					
684	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.	• The RPM Environmental Officers conduct weekly internal inspections of different areas of the Mototolo Mine Complex, which are compiled into a monthly reports/presentations. • Independent external consultants are furthermore appointed to conduct annual compliance audits.	• Environmental compliance inspection, Lebowa Shaft, Sharron Mkhabela (17/07/25) • Der Brochen Environmental Inspection Report, RPM (Jun 2025) • Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025)	
685	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 deviation 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 June 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 the 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 (02/06/2025) • *It is recommended that when the EMPr is reviewed and the 2019 and 2021 EMPrs are consolidated and updated, that the references to the co-disposal facility (and any other infrastructure and activities no longer part of the mine plan) be removed and updated to reflect the construction of the WRD embankment, and the current and planned activities on the Der Brochen North footprint namely the stockpiling, crushing and screening of material excavated from the Der Brochen South Shaft terrace and the current and planned Der Brochen North infrastructure and activities.*	
686	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 Mototolo Mine Complex activities are restricted to the authorised farms.	• Site audit observations (24-26/06/25)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
687	**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 Anglo American Platinum to Valterra Platinum on 8 May 2025. • An EMPr alignment meeting was furthermore held with the DMPR in June 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 (02/06/2025)	☑
688	**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 Mototolo Mine Complex is aware of this condition and obtained WULs for the Mototolo Mine Complex to authorise the required water uses, permits from DAFF and LEDET to disturb protected plants and trees, and WMLs for the two salvage yards. • There are however some compliance gaps that are being/will be rectified: o the Borwa shaft borrow pit, where material was collected in the incorrect locations - *an SIB project is currently underway to rehabilitate the area* o the Borwa and Lebowa shaft stormwater management infrastructure which are not compliant to GN704 - *Redco have completed designs for the upgrades and these will be implemented starting Q4 2025* o outstanding GN704 exemptions required for the Mototolo concentrator, HTSF and MTSF.	• Document review	☒
689	**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.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services.	• Site audit observations and interviews (24-26/06/25)	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
2. Appeal of Authorisation					
	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:			
690	**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.	• The 2024 external EMPr Compliance audit states that the 2022 external EMPr Compliance audit confirmed that the consultant appointed by the Mine notified all registered I&APs of the EA, issued on 18 Mar 2022, by 1 April 2022.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
691	**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.			☑
692	**2.4**	• Draw the attention of all registered I&APs to the manner in which they may access the decision.			☑
693	**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 - Mototolo Mine complex) 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			☑
3. Commencement of the Activity (ies)					
694	**3.1**	• In order to ensure safety, all employees must be given the necessary personnel protective equipment (PPE).	• The required PPE is issues to all employees, contractors and visitors. • Signs indicating compulsory PPE were observed on site.	• Site audit observations and interviews (24-26/06/25) • Photo 72 - Lebowa Shaft compulsory PPE sign	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
695	**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 (7 May 2025)	☑
696	**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.	• Implementation of the various TMPs on site and road signs restrict all vehicles and TMM to designated roads. • The site construction team are advised by the environmental department that no disturbances outside the Mine footprint is allowed, with construction vehicles restricted to the main access and haul roads.	• Site audit observations and interviews (26/06/25)	☑
697	**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 notifications signs were observed at the MTSF's SS contractor's yard and at the MTSF construction site.	• Photo 74 - MTSF - SS contractor's yard: notification signage • Photo 75 - MTSF RWD warning sign	☑
698	**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 concentrator and associated infrastructure required the diversion of non-perennial drainage lines away from the working areas and a non-perennial tributary of the Groot Dwars River. Concrete culverts and gabions have been constructed to minimise erosion. • Bridges and culverts were designed where the access roads cross rivers or stormwater drainage lines, with sufficient erosion and scour protection measures in place to minimise impacts on the riparian zone. • Clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility, with bridges and culverts designed where the access roads cross rivers or stormwater drainage lines to cause limited impedance of flow at these crossings.	• Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
699	**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 site perimeter is pegged prior to construction and the Environmental Officer advises the construction team that no disturbances outside the pegs are allowed. • Erosion measures have been implemented at the Mototolo Mine Complex, but various areas of erosion were however observed during the audit, requiring mitigation, such as along the MTSF northern stormwater channel, Borwa shaft access road and borrow pit (*underway*), Lebowa shaft stormwater outlet, HTSF clean storm water diversion channel and the DB North footprint. • The IAP Procedure describes the identification of IAP through surveys, the principles of the clearing plan and implementation of the identified methods. • AIP eradication is done at the concentrator, MTSF and HTSF, as well as at both shafts. • The WRD embankment/DB North footprint is however not currently included in Agreenco's scope of work for IAP eradication, but will be added in future.	• Der Brochen Environmental Inspection Report, RPM (Jun 2025) • Mototolo Complex Procedure for the removal of Invasive and Alien Vegetation (27/05/2022) • Service Acceptance Letter: YEAR 2: 2nd Eradication - selective Alien and Invasive Plant Eradication: Anglo American Platinum: Mareesburg TSF, pipeline and Mototolo Concentrator, Agreenco (30/08/24)	☒
700	**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.	• Permits were obtained for protected trees and plants on the farms Mareesburg 8 JT and Thorncliffe 374 KT. • No proof could be provided of permits for the farm Helena 6 JT.	• Licence LP - SDM - 0025 - 2024-25 to authorise actions and activities affecting protected trees: cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 13 May 2024 - 13 May 2025, DFFE (13/05/24) • Licence LP-SDM-0207-2024-25 to authorise actions and activities affecting protected trees, cut, disturb, damage, and destroy protected trees in terms of [Section 15(1)] of the National Forests Act, 1998, as amended] - 3 Mar 2025 to 3 Mar 2026, DFFE (03/03/25)	☒
701	**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 topsoil stockpiles at the MTSF and WRD embankment/DB North footprint are not located directly adjacent to drainage lines and berms are in place surrounding the area.	• Method Statement: Topsoil Stockpile Management, WBHO (14/01/21) • Post site audit clarifications	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
702	**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 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 ZW2L facility*.'	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002)	
703	**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.	• Waste is management at Mototolo Mine Complex in line with the Waste Management Procedure, of which the aim are to: o '*The aim of this procedure is to establish, implement and maintain an effective waste management system.* o *To give effect to conditions of the Waste Management Licenses as issued to Mototolo: Lebowa Shaft and Borwa Shaft as issued by the DEA and Zero waste to landfill strategy.* o *To outline systematic approach on all waste including; elimination, reduction, re-use, recycle and safe management of waste*.' • Various domestic waste separation bins and impermeable skips, as well as hazardous waste skips were observed in use on site, with waste transported 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 17 - hazardous waste skip at the SS contractor's yard, on a concrete surface with bund wall • Photo 45 - hazardous waste bin and bunded skip at the concentrator • Photo 64 - Borwa shaft waste management • Photo 65 - Lebowa shaft waste management • Waste Recon: Mototolo - Lebowa, Waste Legends, 2025 • Photos 78-79 - concentrator domestic bins and skips	
704	**3.11**	• In terms of sections 28 and 30 of NEMA, and sections 19 and 20 of the National Water Act, 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 Mototolo Mine Complex is aware of this condition. • The EMPr and WUL authorisations and conditions were/are shared with all the Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (7 May 2025)	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
705	**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 of vehicles and equipment is done at the various workshops and at the contractor's yards on site, in line with the OEM schedule. • Drip trays were observed under all parked equipment at the Mareesburg TSF SS contractor's yard. • The 2025 RPM internal inspection report of the DB North footprint depicts equipment parked with a drip tray underneath. • None of the parked vehicles at either of the shafts, however had drip trays underneath and leaks were observed. Leaking vehicles have also been reported at the shafts, in previous internal and external compliance audits during 2024-2025. • Waste is management at Mototolo Mine Complex in line with the Waste Management Procedure, of which the aim are to: o '*The aim of this procedure is to establish, implement and maintain an effective waste management system.* o *To give effect to conditions of the Waste Management Licenses as issued to Mototolo: Lebowa Shaft and Borwa Shaft as issued by the DEA and Zero waste to landfill strategy.* o *To outline systematic approach on all waste including; elimination, reduction, re-use, recycle and safe management of waste*.'	• Der Brochen Environmental Inspection Report, RPM (Jun 2025) • Photo 1 - parked equipment with drip tray underneath • Photos 15-16 - bunded, concreted refuelling areas and drip trays under parked equipment • Photo 59 - Borwa shaft: equipment at workshop with no drip tray and spill underneath • Photo 67 - Lebowa shaft: equipment parked with no drip trays and visible leaks • Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012)	
706	**3.14**	• Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	• The Mototolo Mine Complex is aware of this condition. • Annual noise monitoring is undertaken at the Mototolo Mine Complex boundary, at various locations within the Complex and at the closest sensitive receptors. • Readings at the closest sensitive receptors surrounding the Mine, were all below the residential SANS 10103:2008 limits during the day (<55 dBA) and night (< 45 dBA). • Readings at the shafts, concentrator and TSFs were all below the SANS 10103:2008 industrial limit of 70 dBA, at the Mine boundary for both day and night-time periods .	• Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24)	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
707	**3.15**	• Dust suppression measures must be implemented on all exposed surface to minimise and control airborne dust.	• The SS TMP mentions the watering of roads with bowsers and a water bowser was observed at the SS contractor's yard. • Single exceedances of the DFO limit were recorded north, south and west of the MTSF and a significant dust plume was observed on the dam during the audit, with no evidence provided on the collection of fines. • Evidence of dust suppression was observed during the audit on the concentrator main access road. • The shafts' Water Balances also show water used for dust suppression. • The latest 2025 reports show that all single dust buckets were legally compliant, with only single exceedances at two sites north of the HTSF. • This is mainly due to the vegetation project which was implemented by the operation. • This condition is noted by the Mototolo Mine Complex.	• Site audit observations (24-26/06/2025) • Photo 25 - SS Water Bowser • Photo 49 - wet suppression on the main concentrator access road	
708	**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. • The 2025 RPM internal inspection report of the DB North footprint shows wet and dry cement disposed of on bare ground.	• Site audit observations (24-26/06/2025) • Der Brochen Environmental Inspection Report, RPM (Jun 2025) • Photo 76 - DB North: cement mixing and spilling on bare ground • Photo 77 - DB North: disposal of cement waste on bare ground	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
709	**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 Chance Finds, 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)	☑
710	**3.18**	• Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons.	• The topsoil stockpiles at the MTSF Phase 4 construction site were observed to be free of hydrocarbon contamination. • Excavated material (currently being crushed and screened) and topsoil stockpiled at the DB North footprint, was not reported as contaminated by any hydrocarbons in the latest RPM internal audit report.	• Photo 5 - topsoil stockpiles • Der Brochen Environmental Inspection Report, RPM (Jun 2025)	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
711	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.	• All chemicals required for construction of the MTSF Phase 4, are stored at the SS contractor's yard in bunded chemical cages, separating flammable chemicals from non-flammable hazardous substances. • Spill kits are available at the SS contactor's yard and no spills were observed on any concrete surfaces or on any bare ground. • The Environmental Officer also confirmed that no hazardous substances are stored at the WRD embankment/DB North footprint, with hydrocarbons required for construction, stored in bunded areas at the central DB workshop.	• Photo 21 - MTSF SS contractor's yard: bunded flammable substances cage • Photo 22 - MTSF SS contractor's yard: bunded hazardous substances cage • Photo 18 - MTSF SS contractor's yard: Spill Kits • Der Brochen Environmental Inspection Report, RPM (Jun 2025)	
712	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.	• Chemical toilets are provided site-wide and are managed by an external contractor.	• Photo 20 - chemical toilets at the TSF construction site	
713	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).	• Water uses at the Mototolo Mine Complex are authorised in the following WULs: o Concentrator and HTSF: 2011, 2016 and 2017 o MTSF: 2017 and 2023 o Lebowa and Borwa shafts: 2019 and 2022 o DB North: 2021	• Mototolo Concentrator 2011 Water Use Licence Number: 24072959 • Mototolo Concentrator 2016 Water Use Licence Number: 04/B41G/CI/4141 • Mototolo Concentrator 2017 Water Use Licence Number: 06/B41G/ABCFGIJ/5329 • Mototolo Mine 2019 Water Use Licence Number: 06/B41G/IACGJ/8944 and 2022 Amendment of Licence No: 06/B41G/ACGI/13267 • Der Brochen Mine 2021 Water Use Licence Number: 06/B41G/ABCGIJ/10965 • MTSF and RWDs 2023 Water Use Licence Number: 06/B41G/CGI/12990	
714	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 Mototolo Mne Complex is aware of this condition.	• Site audit and interviews (24-26/06/2025)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
715	**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.	• The consolidated beach platform of the HTSF was revegetated and some of the starter wall and side walls. Revegetation trials are currently underway for the side slopes of the HTSF. • Only the Phase 1 embankment of the MTSF was covered with topsoil and seeded; none of the other slopes have been rehabilitated. • No rehabilitation has been undertaken during the audit period at the Lebowa and Borwa shaft areas, nor at the Der Brochen North footprint. An SIB project is currently underway to rehabilitate the Borwa borrow pit.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Site audit observations (24-26/06/25) • Post site audit clarifications	
716	**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 Mototolo Mine Complex is aware of this condition.	• Site audit and interviews (24-26/06/2025)	
717	**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.	• This 2022 IEM states the following with regards to NEM:WA Listed Activities: o '*With regards to the Der Brochen Project, none of the waste management activities undertaken on site required authorisation under NEM:WA as the waste management activity either did not exceed the waste volumes/thresholds stipulated in the Listed Waste Management Activities or the relevant NEM:WA Regulations (GNR 921, as amended) were not yet published and promulgated.* o *In terms of the Lebowa and Borwa shafts, both operations received separate Waste Management Licences (WMLs) from the Department of Environmental Affairs in March 2010 for the storage of general and hazardous waste on site*.' • The Environmental Officer confirmed that the various residue stockpiles outside of the shafts' demarcated areas, as reported in the 2024 external compliance audit, were removed.	• IEM, DMPR (18/03/22) • Post site audit clarifications	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
718	**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.	• This 2022 IEM states the following with regards to NEM:WA Listed Activities: o '*With regards to the Der Brochen Project, none of the waste management activities undertaken on site required authorisation under NEM:WA as the waste management activity either did not exceed the waste volumes/thresholds stipulated in the Listed Waste Management Activities or the relevant NEM:WA Regulations (GNR 921, as amended) were not yet published and promulgated.* o *In terms of the Lebowa and Borwa shafts, both operations received separate Waste Management Licences (WMLs) from the Department of Environmental Affairs in March 2010 for the storage of general and hazardous waste on site*.'	• IEM, DMPR (18/03/22) • H:H (General and Hazardous Waste Temporary Storage Facility) - Mototolo South Salvage Yard - Licence Number: 12/9/11/L224/5, Department of Environmental Affairs (Licence dated 19/03/10, DEA letter dated 23/03/10) • H:H (General and Hazardous Waste Temporary Storage Facility) - Mototolo North Salvage Yard - Licence Number: 12/9/11/L225/5, Department of Environmental Affairs (Licence dated 23/03/10, DEA letter dated 29/03/10)	
719	**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 Mototolo Mine Complex is aware of this condition.	• Site audit and interviews (24-26/06/2025)	
720	**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 Mototolo Mine Complex is aware of this condition.	• Site audit and interviews (24-26/06/2025)	
721	**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 Mototolo Mine Complex is aware of this condition.	• Site audit and interviews (24-26/06/2025)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
722	**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.	• Various domestic waste separation bins and impermeable skips, as well as hazardous waste skips were observed in use on site, with waste transported to the salvage yards/sorting areas, from where it is removed off-site to recycling facilities or registered landfills. • The salvage yards both have cast concrete slabs. The bunded areas have not been treated with a chemical resistant nor impermeable paint or material. Hazardous waste skips are equipped with lids to prevent direct sunlight and contact with rain water. Roofing over these areas is not practical due to lifting equipment access required when removing the waste skips. • It was recommended in the 2019, 2021 and 2023 external WML audits, that all waste skips are provided with lids; alternatively roofing must be supplied or an amendment to this condition should be applied for. It was also recommended that the bunded areas be lined with a waterproof and chemical resistant paint or material.	• Mototolo Complex Waste Management Procedure (MOTC-SHE-ENV-PRO-0012) • Photo 17 - hazardous waste skip at the SS contractor's yard, on a concrete surface with bund wall • Photo 45 - hazardous waste bin and bunded skip at the concentrator • Photo 64 - Borwa shaft waste management • Photo 65 - Lebowa shaft waste management • Waste Recon: Mototolo - Lebowa, Waste Legends, 2025 • Photos 78-79 - concentrator domestic bins and skips • Photo 80 - Borwa Salvage Yard: hazardous waste skips with lids	

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
723	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. • All hazardous substances at the SS contractor's yard were stored in bunded areas with impermeable floors, oil separators and peripheral drains. • Individual bunded areas were observed at the Mototolo concentrator including: new and used oils are stored separately within bunded areas, the boilermaker paint store cages are in bunds, the diesel tank is stored within a bund and the hazardous waste skip is bunded. Bund capacities were clearly displayed for all bunds, complying with legal requirements. • Various non-compliances were observed at the Borwa and Lebowa shafts: o The channels and drains at both shafts' workshops are very shallow, damaged and filled with silt and litter, with overflows observed. o None of the parked vehicles had drip trays underneath at either of the shafts and leaks were observed. o Though oil was mostly stored in the designated oil bays, significant oil spills were observed at the shafts, with no evidence of clean-up using oil absorbents. • Clean and dirty water are currently mixing at the Borwa shaft. Redco has compiled new Stormwater Management Infrastructure designs for both shafts, to ensure separation of clean and dirty water and compliance with the NWA and GN704.	• Mototolo Complex Hydrocarbon Management, Spillage and Clean up Procedure (MOTC-SHE-ENV-PRO-0002) • Photos 13-14 - diesel storage in bunded area, with collection drain and oil separator • Photo 50 - Mototolo concentrator bunded oil storage • Photo 45 - hazardous waste bin and bunded skip at the concentrator • Photo 52 - Mototolo concentrator bunded diesel tank • Photo 59-60 - Borwa shaft damaged and sited workshop drains and sump at the diesel storage area and equipment at workshop with no drip tray and spills underneath • Photo 81 - Borwa shaft diesel and oil storage area with significant spills/leaks • Photo 61-62 - Lebowa shaft damaged and silted channels and drains, with debris and overflows • Photo 67 - Lebowa shaft: equipment parked with no drip trays and visible leaks • Rainfall is recorded at the Mototolo Complex with the Annual Mine Water Balances Updates for both shafts showing Site Rainfall and the GCS Water Monitoring Reports indicating monthly rainfall on the analysis graphs. • Lebowa Mine SWMP Update: Clean and Dirty Water Infrastructure and Existing & Proposed Infrastructure, Redco (04/07/25) • Borwa Mine SWMP Update: Clean and Dirty Water Infrastructure and Existing & Proposed Infrastructure, Redco (04/07/25)	
724	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.	• Most of the activities included in this IEA have commenced. • The Mototolo Mine Complex is aware of this condition.	• Site audit and interviews (24-26/06/2025)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
725	**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.	• Most of the activities included in this IEA have been commissioned and are undertaken within the phases and timeframes detailed in the EMPr. • The HTSF reached its design life in Dec 2020 when deposition onto the HTSF ceased, but it is still being monitored and maintained, with water still currently being pumped between the RWDs, PCD and sump. • No activities have been decommissioned to date.	• Site audit observations (24-26/06/25) and interviews	☑
726	**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 April 2003: Mining Right Reference Number: LP30/5/1/2/2/182 MR.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
727	**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.	• I&APs were notified of the approval of the 2021 Der Brochen-Mototolo Mine Complex Amended EMPr, (IEA dated 18/03/22) on 1 April 2022. • Note that all the listed activities in the IEA were approved in previous EAs, as this 2022 IEA refers to the consolidation of the previously approved EMPrs.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024)	☑
728	**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 Mototolo Mine Complex is aware of this condition and has not raised any conflicting conditions.	• Site interviews (24-26/06/2025)	ⓘ
4. Management of Activity (ies)					
729	**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 Officers confirmed that electronic copies of the environmental authorisations are shared with the contractors and kept on the RPM database.	• Site interview (24-26/06/2025)	☑
730	**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 Mototolo Mine Complex Contractors at the Weekly Safety Meetings.	• Weekly Safety Meeting Attendance Register (07/05/25)	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
731	**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 Environmental Officers undertake weekly inspection of different areas of the Mototolo Mine Complex, which are compiled into monthly reports /presentations, and includes the drainage facilities. • Annual inspections are furthermore undertaken of all drainage facilities surrounding the plant. • Various areas of insufficient maintenance and damage were however observed during the audit requiring cleaning and repair: o Borwa and Lebowa shafts: workshops, where Redco have completed designs to upgrade the clean and dirty water infrastructure which are not separated, damaged, silted, insufficiently sized and not sloped correctly; the harstands were also observed to be cracked and damaged. o Concentrator: cracks in the hardstand of the laydown area, the dirty water channels significantly silted, the outlet valve and sump at the diesel refuelling area is silted and the PCD requires maintenance as the area is very silted due to overflows at the PCD entrance and silt drying beds. o Chrome plant: more frequent maintenance as there has been several overflows of the Chrome Plant sump and significant amounts of silt were observed outside the bund wall and containment infrastructure.	• Environmental Inspection, Mototolo Concentrator May 2025, Week 1 - 4, Selemela Mathekga (May 2025) • Mototolo Concentrator Plant & Helena TSF River crossing inspection Year 2024, AAP (28/10/2024) • Photo 59-60 - Borwa shaft damaged and sited workshop drains and sump • Photo 61-62 - Lebowa shaft damaged and silted channels and drains, with debris and overflows • Photo 82 - cracks in the concentrator laydown area's hardstand	
732	**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 existing Borwa Ventilation shaft access road has been constructed within less than the EMPr recommended 30 m buffer zone around graves (site BP01) and within less than the EMPr recommended buffer zone of 20 m from CH sites HP01 and HP03.	• Photo 73 - 2014 Exigo Cultural Heritage Map	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
733	**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 Mototolo Mine Complex conducts the following environmental monitoring: o air quality: monthly DFO monitoring is undertaken by GCS various sampling locations (single dust buckets) surrounding the Mine o biomonitoring: bi-annual (summer and winter) aquatic and toxicological assessments of the Groot Dwars River and Mareesburg Stream o noise: annual noise monitoring on site and at the closest sensitive receptors o safety: annual Dam Safety Inspection (DSI) Report for HTSF and MTSF o water quality: monthly surface water and groundwater quality sampling, monthly static groundwater level determinations and monthly weir flow determinations. • Proof of Platinum Health HIV/AIDS brochures and talk topics were provided to the auditor, which include contact numbers of councillors and Mental Health Services.	• Anglo American Der Brochen and Mototolo Mine Complex Annual Noise Monitoring Report 2024, SLR (07/10/24) • 2024-2025 Water Monitoring Reports (GCS) • Platinum Health: Adjusting to Life with HIV • Platinum Health: How to navigate your relationship	☑
734	**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, 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)	☑
735	**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.	• No liquid waste is being discharged to any sewers at the Mototolo Mine Complex. • Chemical toilets are provided site-wide and are managed by an external contractor.	• Site audit and interviews (26/06/2025)	N/A
736	**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 Mototolo Mine Complex is aware of this condition and has not raised any conflicting conditions.	• Site interviews (24-26/06/2025)	ⓘ
737	**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 Mototolo Mine Complex is aware of this condition and has not raised any conflicting conditions.	• Site interviews (24-26/06/2025)	ⓘ

#	IEA #	Condition	Audit Observation	Site Evidence/Motivation	2025 Compliance Rating
738	**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 2019 Der Brochen Amendment Project EIAR and EMPr and associated 2021 IEA. • An alignment meeting was held with the DMPR in June 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	
739	**4.11**	• Rehabilitation of the disturbed surface caused by operation at all times must comply with the approved EMPr.	• The consolidated beach platform of the HTSF was revegetated and some of the starter wall and side walls. Revegetation trials are currently underway for the side slopes of the HTSF. • Only the Phase 1 embankment of the MTSF was covered with topsoil and seeded; none of the other slopes have been rehabilitated. • No rehabilitation has been undertaken during the audit period at the Lebowa and Borwa shaft areas, nor at the Der Brochen North footprint. An SIB project is currently underway to rehabilitate the Borwa borrow pit.	• Service Acceptance Letter: Vegetation establishment: Grassing Helena TSF consolidated beach platform area, Agreenco (24/10/23) • Proposal for the implementation of vegetation establishment trials @ Mototolo TSF complex, Hydromulch, 2023 • Site audit observations (24-26/06/25) • Post site audit clarifications	
740	**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 external EMPr compliance audit states that: o '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 ECOs were submitted to the *DMPR* on 3 January 2023.'	• Letter to the DMPR, with date stamp of 3 January 2023.	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
741	**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 Mine Complex maintains an electronic Environmental Incident Register. • A grievance register is kept for the Mototolo Mine Complex. • 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 monthly internal environmental inspection reports (RPM Environmental Officer)) o annual external EMPr compliance audit reports o all environmental authorisations, licences, permits and correspondence with the Department.	• Mototolo Complex Environmental Incident Register, 2024-2025 • Mototolo Complex Grievance Register, 2025 • Review of various environmental monitoring reports supplied as evidence for the current audit period.	
742	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (26/06/2025)	
743	**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 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.	• Site audit and interviews (26/06/25) • Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20)	
744	**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.	• Northern and Southern clean water diversion channels were constructed upstream of the MTSF to divert clean stormwater around the facility. The channels flow into the northern and southern concrete stepped channels, with the discharge flowing through energy dissipaters before discharging into the Mareesburg Stream. • Culverts and gabions were observed at the MTSF pipeline crossings over drainage lines.	• Mareesburg Tailings Storage Facility and Return Water Dam Complex Detailed Design and Construction Project: Civil Detailed Design Report, SRK (23/10/20) • Mareesburg Tailings Storage Facility Phase 4 Detail Design Report, SRK (29/08/22)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
745	**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 Mine Complex has appointed a Hazardous Materials Coordinator, responsible for the purchase, storage, issue and accounting for any hazardous substances used at Mototolo Mine Complex which (if not properly supervised) could result in death/injury/ illness to any employee, contractor or the public, or in product contamination. • Evidence was also provided of up-to-date training of the Concentrator and MTSF responsible person for the management of hazardous chemicals.	• Hazardous Materials Coordinator, SHE/2025/312, Mototolo Complex (10/04/25) • Certificate of Competence: Hazardous Chemical Handling, CPME (14/06/25)	☑
746	**4.18**	• In order to prevent nuisance conditions, the holder of the IEA must ensure that all storage skips and bins are not overfilled.	• None of the bins and skips at the Mototolo Mine Complex were observed to be overfilled.	• Photo 17 - hazardous waste skip at the SS contractor's yard, on a concrete surface with bund wall • Photo 45 - hazardous waste bin and bunded skip at the concentrator • Photo 64 - Borwa shaft waste management • Photo 65 - Lebowa shaft waste management • Waste Recon: Mototolo - Lebowa, Waste Legends, 2025 • Photos 78-79 - concentrator domestic bins and skips • Photo 80 - Borwa Salvage Yard: hazardous waste skips with lids	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
5. Reporting to the Department					
747	**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 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 EA 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 November 2024 (EnviroGistics), and was submitted to the DMPR on 04/12/2024.	• 2024 EMPr Compliance Audit, EnviroGistics (Nov, 2024) • Mototolo Complex letter of submission of the audit report to the Regional Head: DMPR Polokwane, dated 25/11/24, stamped 04/12/24	
748	**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 2019 and 2021 EMPrs are consolidated and updated, that the references to the co-disposal facility (and any other infrastructure and activities no longer part of the mine plan) be removed and updated to reflect the construction of the WRD embankment, and the current and planned activities on the Der Brochen North footprint namely the stockpiling, crushing and screening of material excavated from the Der Brochen South Shaft terrace and the current and planned Der Brochen North infrastructure and activities.*	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
749	**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 Mine Complex. • 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.	• Mototolo Complex Grievance Register, 2025	☑
750	**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.	• The Mototolo Mine Complex assesses their Closure Liability on an annual basis, with the latest report dated Dec 2024. • Evidence of the submission of the proposed 2024 contributions, submitted to the DMPR, was issued to the auditor for review.	• Preliminary Rehabilitation, Decommissioning and Mine Closure Plan for Mototolo Complex, WSP (Dec 2024) • AAP Letter dated December 2024: Mototolo Environmental Rehabilitation Trust: Proposed contributions for the year ending December 2024 - Mototolo Complex LP/5/1/2/3/2/1 (0182) EM (DMPR Date Stamped 03/04/2025) • HSBS Bank plc Letter dated 17 March 2025: Performance Guarantee Reference: PEBJOH250194 (DMPR Date Stamped 03/04/2025)	☑

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
751	**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 Mototolo Incident Register for 2024-2025 was provided to the auditor and includes water-related incidents related to both shafts. • Incidents of overflows were reported during the audit period, at both of the shafts' PCDs and the MTSF RWD ponds, all related to flood events due to excessive rainfall. • The following incident notifications were submitted to the DWS during the audit period: o Borwa stormwater dam overflowed on 20/12/24 - DWS was informed via email on 20/12/24. o MTSF RWD Pond 1 overflowed on 20/12/24 - DWS was informed via email on 23/12/**24 more than 24 hours after** the incident occurred. o Borwa PCD overflowed on 07/01/25 - DWS was informed via email on 08/01/25. o Lebowa PCD overflows on 09/01/25 - DWS was informed via email on 10/01/25. o MTSF RWD Pond 1 overflowed on 07/01/25 - DWS were notified via email on 08/01/25. o MTSF RWD Pond 1 overflowed on 05/05/25 - DWS incident notification was sent 06/05/25. o The Mareesburg tailings spill from tailings delivery line B occurred on 14 March 2025 at around 16:01 pm the Competent Person for Mareesburg TSF. The notification was sent to the DWS on 17 March 2025, **more than 24 hours after** the incident occurred.	• SHE/2024/985, RE: Incident Notification, AAP (20/12/24) • Water related incident notification email, 8 January 2025 • Water related incident notification, 6 May 2025 • Level 2 Environmental Incident that occurred at Mototolo Concentrator, 17 March 2025	
752	**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.	• No proof of follow-up submissions of the shafts' SWDs and PCDs were provided to the auditor. • Three (3) follow up submissions for the MTSF RWD ponds incidents described above were submitted **more than 14 days** after the occurrence of the incidents: o 7 January 2025 overflow from Mareesburg Pond 1: The follow up submission was undertaken on 17 July 2025. o 14 March 2025 tailing pipeline spill: The follow up submission was undertaken on 3 April 2025. o 5 May 2025 overflow from Mareesburg Pond 1: The follow up submission was undertaken on 17 July 2025.	• Environmental water related Final incidents submission: 7 January 2025, stamped by the DWS on 17 July 2025 • Final Submission of incident on 14 March 2025, stamped by DWS on 3 April 2025 • Environmental water related Final incidents submission: 5 May 2025, stamped by the DWS on 17 July 2025	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
753	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	
6. Site Security and Access Control					
754	**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.	• The Mototolo Mine Complex is fenced and access is controlled by RPM Protection services.	• Site audit observations and interviews (24-26/06/25)	
755	**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.	• Notices were observed at various entrances at the Mototolo Mine Complex. • The signs were however mostly in English (*with only some translated into sePedi, isiZulu and Afrikaans*), and most were faded, damaged and missing relevant information such as contact details of the holder of the IEA and the person responsible for the operation of the site.	• Photos 69-70, 76 and 83-88 - notices at the Mototolo Complex	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
7. Emergency Preparedness Plan					
756	**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 Complex Emergency Response Management Plan states that: o '*The SHE Manager and the Review Committee is responsible for the review of this Plan. Such reviews will take place annually or as and when changes are required*.' • The History of changes shows that reviews were done on 24/01/25 and again on 28/05/25. • The Complex Emergency Response Management Plan addresses: o Fire Emergency o Spillages of Tailings from the Transfer System o Environmental Incidents (including spillage) o Natural Disasters Emergencies o Flooding o Labour Unrest Procedure o Emergency Telephone Numbers: General, Site Specific and Crisis Management Contact Details.	• Mototolo Complex Emergency Response Management Plan, Valterra Platinum (MOTC-SHE-EME-MAN-0001)	☑
757	**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.	-	☒
8. Investigations					
758	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	ⓘ
759	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	ⓘ

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
760	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	
761	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	
9. Commissioning and Decommissioning					
762	**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.	• Most of the activities included in this IEA have been commissioned and are undertaken within the phases and timeframes detailed in the EMPr. • The HTSF reached its design life in Dec 2020 when deposition onto the HTSF ceased, but it is still being monitored and maintained, with water still currently being pumped between the RWDs, PCD and sump. • No activities have been decommissioned to date.	• Site audit observations (24-26/06/25) and interviews	
10. Site Closure					
763	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	
764	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
765	**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 Mareesburg nursery prior to being used in rehabilitation. • The Agreenco 2020 Master Plan also states that: "*Use of 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. This will assist in areas were regrowth is not to acceptable standard*."	• Master Plan for the relocation of plants of Conservation Concern at the AAP, Der Brochen Project Sites, Agreenco (Jun 2020)	
766	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (24-26/06/2025)	

#	IEA #	CONDITION	AUDIT OBSERVATION	SITE EVIDENCE/MOTIVATION	2025 COMPLIANCE RATING
11. NEMA Principles					
767	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (26/06/2025)	
12. Disclaimer					
768	**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 Mototolo Mine Complex is aware of this condition.	• Site interviews (26/06/2025)	

6. AUDIT RESULTS AND WAY FORWARD

6.1 AUDIT RESULTS ANALYSIS

The audit results are summarised in ***Table 5*** and depicted graphically in ***Figure 4*** below. ***Figure 5*** presents the comparison of the 2024 audit results to the 2025 results.

Table 5: Audit Results Summary

2025 RATING		NO. OF CONDITIONS			% OF TOTAL CONDITIONS
		2021 EMPR	2022 IEA	TOTAL	
☑	**Compliant**	424	46	470	**61**
☒	**Non-Compliant**	104	18	122	**16%**
N/A	**N/A**	40	1	41	**5.5%**
ⓘ	**Noted**	110	25	135	**17.5%**
TOTAL CONDITIONS		**678**	**90**	**768**	**100%**

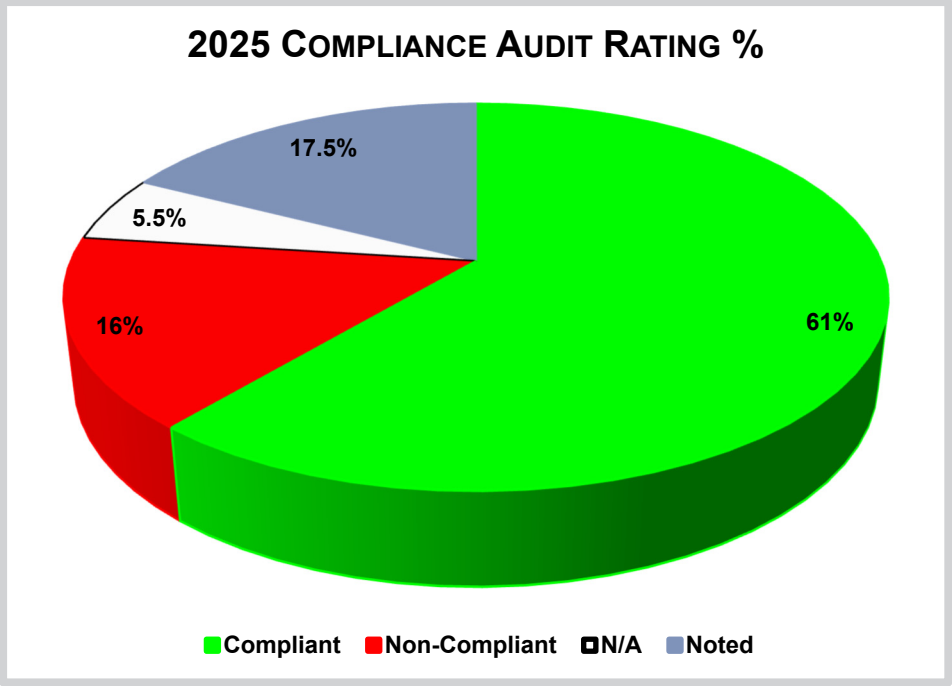


Figure 4: Results of the 2025 EMPr Compliance Audit

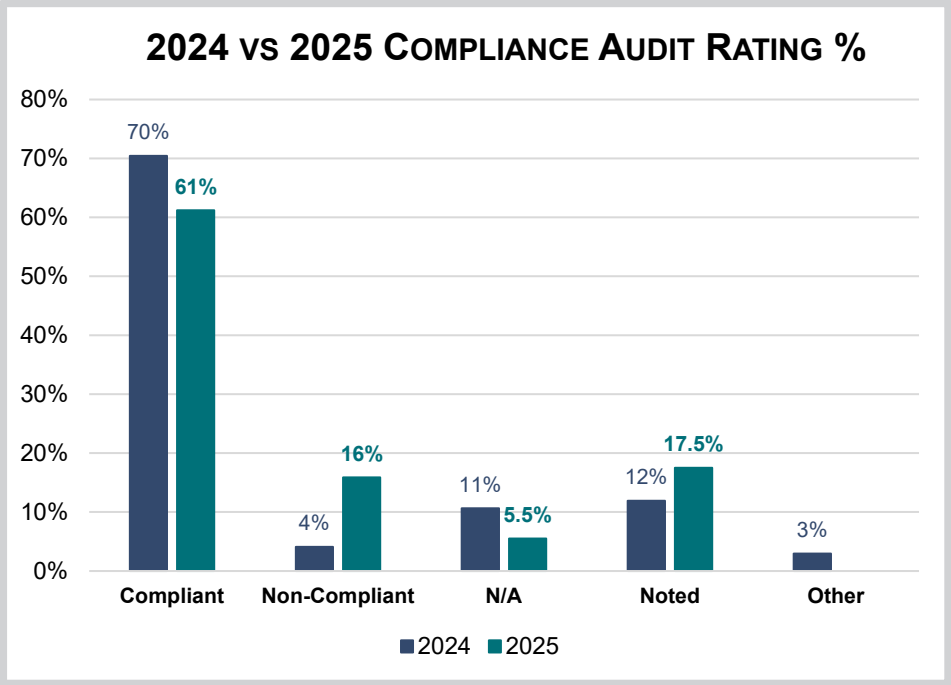


Figure 5: Comparison of the 2024 vs 2025 Audit Results

The Mototolo Mine Complex achieved an overall full compliance level of 61%, measured against the 768 conditions of the 2021 EMPr and associated 2022 IEA. 16% of the conditions were non-compliant, 5.5% not applicable and the remaining 17.5% noted.

There was an increase in the number of applicable conditions audited in 2025 vs 2024 from 698 to 727, with an associated 6% decrease in the number of not-applicable conditions from 83 to 41. This resulted in a decrease in the overall compliance level from 70% to 61%, with an increase in the non-compliant (4%-16%) and noted (12%-17.5%) conditions between from 2024 to 2025.

The 2025 audit's non-compliances to the conditions of the 2021 EMPr and associated 2022 IEA, per operational area, related to the following environmental aspects, risks and impacts:

- **Mototolo Mine Complex (General conditions):**
  - Biodiversity:
    - No evidence (certificates required) was provided of inspections of excavation equipment entering the site, to ensure they are cleaned and free of any seed propagules.
  - Emergency Register:
    - Mototolo Mine Complex has an Emergency Response Management Plan, but not the IEA required Emergency Register.
  - Incident reporting:
    - DWS notification of some of the water-related incidents (*overflows of dams due to excessive rainfall and flooding during the audit period*) were sent outside of the 24 hour initial reporting deadline, and/or outside of the follow-up action plan submission deadline of 14 days.
  - Maintenance:
    - Significant hydrocarbon spills were noted at both shafts and had not been washed down. The EMPr requires that: '*Any accidental spillages at the refill point will be washed down to the oil skimmer where the oil is removed and the wash water recycled*.'
  - Notices/signage:
    - The IEA requires: '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.' Notices were observed at various entrances at the Mototolo Mine Complex.

The signs were however mostly in English (*with only some translated into sePedi, isiZulu and Afrikaans*), and most were faded, damaged and missing relevant information such as contact details of the holder of the IEA and the person responsible for the operation of the site.

- ~ Social Aspects:
  - – No evidence has been provided of community access to medicinal plants prior to clearing of the various sites.
- ~ Soils, Land Capability and Land Use:
  - – Annual inspections are undertaken of all drainage facilities surrounding the plant, not at three monthly intervals, as recommended. Erosion was also observed along the MTSF access road.
  - – No designated lined or bunded concrete and cement mixing areas were observed on site.
- ~ Surface Water:
  - – Permanent Stormwater Management Plan/Procedure, including the details recommended in the 2019 and 2021 EMPrs, such as final layout drawings of all water management infrastructure, details of inspections and maintenance, erosion and sediment control, monitoring and reporting.
  - – No Inspection and Maintenance Plan has been developed.
- ~ Traffic and transportation:
  - – The various Traffic Management Plans (TMPs) do not refer to the monitoring of traffic conditions, or mitigation measures.
  - – The 2024 external audit states that: '*A Road Safety Disciplinary Procedure has been developed and is currently in draft format. This has however not been implemented as it is in draft format*.' No evidence was provided of this or another procedure regarding road conditions.

» **Helena TSF:**

- ~ Biodiversity:
  - – No protected plants nor trees were relocated from the HTSF footprint prior to its construction.
- ~ Groundwater:
  - – The 2022/2023 updated model results (Delta-H, 2023) as well as the recent 2024 monitoring results show that pumping from the existing horizontal wells alone is insufficient for complete plume containment. The model was updated to account for an optimised pumping regime based on abstractions from existing as well as newly proposed scavenger wells. Results indicate that the existing and new strategically placed scavenger wells will be required to arrest the migrating plume towards receptors, i.e., tributaries and the Groot-Dwars River.
- ~ Soils, Land Capability and Land Use:
  - – Due to the absence of topsoil, a soil amelioration programme has been developed by Hydromulch, which is currently being tested as part of the revegetation trials on the side slopes.
  - – No evidence of weekly inspections of the pipeline route for spills and leakages.
- ~ Surface Water:
  - – No evidence was provided on whether the 2020 Redco recommended designs to upgrade the south and north trench around the HTSF, including lining interventions, to limit the further erosion of the trench and accommodate the sediment run-off which currently ends up in the wetland, were implemented. The 2020 Redco report also referred to the 2018 recommended stabilisation measures for the clean storm water diversion channel to the west of the HTSF.

» **Mareesburg TSF:**

- ~ Air Quality:
  - – No evidence was provided on the collection of fines of the MTSF, nor of dust suppression on the dam.
- ~ Biodiversity:
  - – Agreenco's 2022 Technical Note confirms that: '*no protected plant surveys were conducted before the construction of the pipeline*'.



- No evidence provide that the recommended off-set number of protected plant species, as recommended by Agreenco based on their Jan 2022 survey along the MTSF pipeline corridor, were propagated in the Mareesburg Nursery, in order to be replanted in the rehabilitated areas.
- The 2023 Der Brochen BAP does not refer to an offset strategy.
- No evidence of implementation of the 2023 BAP's action plans and activities, or monitoring of these, were provided, nor if/how the three natural management units (*Management unit 1: Sekhukhune Mountain Bushveld Habitat; Management unit 2: Montane Grasslands Habitat and Management unit 3: Freshwater Habitat*) are being managed.
- No evidence of a game management plan was provided.
- No evidence of use of the rescued various protected plant and tree species, as well as harvested root cuttings from the TSF footprint since 2017, in any rehabilitation at the MTSF.
- A natural spring was noted during the audit alongside the MTSF access road. The spring keeps filling up and flowing downgradient. Temporary measures were implemented to allow the spring to flow freely, and cross the road, but this may potentially cause contamination to the spring water. No culverts have been installed.

~ Soils, Land Capability and Land Use:
- Erosion was evident along the disturbed steep slopes adjacent to the northern stormwater channel, as well as smaller gullies forming along the road to the northern stormwater channel. Erosion was also noted along the main access road.
- Only the Phase 1 embankment of the MTSF was covered with topsoil and seeded; none of the other slopes have been rehabilitated.

~ Surface Water:
- Erosion was evident along the disturbed steep slopes adjacent to the northern stormwater channel, as well as smaller gullies forming along the road to the northern stormwater channel. Erosion was also noted along the main access road.
- Only the Phase 1 embankment was rehabilitated, including hydroseeding. Several areas of erosion were noted at the MTSF during the audit, where construction has been completed, and have not been rehabilitated.
- No evidence was provided of the reuse of runoff water for ie dust suppression on site.
- The water quality monitoring detected seepage in 2024 and 2025 from the Mareesburg TSF, but no evidence has been provided on any interception mitigation measures, such and trenches or boreholes, based on the 2020 SRK design report and the 2024/2025 groundwater model update by Delta-H.
- The capacity of clean water diversion A (upslope of the plant) was however not able to contain a 1:50 years runoff event.
- The 2012 SRK SWMP states that: '*The capacity of clean water diversion A (upslope of the plant) was however not able to contain a 1:50 years runoff event*.' No evidence was provided to confirm if the capacity of this diversion was increased.

» **Mototolo Concentrator and Chrome Plant:**

~ Groundwater:
- The 2024 Annual Water Quality Report states: '*It is recommended that an investigation be conducted to determine the source of contamination downgradient from the PCD at borehole MBH6*.' Scavenger wells were installed below the HTSF, but no evidence has been provided of pumping of contaminated groundwater surrounding the concentrator.

~ Soils, Land Capability and Land Use:
- Various areas of siltation were however observed within the concentrator footprint and surrounds: concentrator dirty water channels: significantly silted; diesel refuelling area: the outlet valve and sump are silted and PCD: siltation due to overflows at the PCD entrance and silt drying beds.



- ~ Surface Water:
  - – Some areas of non-compliance were observed on site: Concentrator PCD: the silt drying bed next to the PCD and roadway between the two areas are outside of the dirty water catchment, therefore runoff from this area is not contained; silt has also washed down from the area eastward, towards the Groot Dwars River tributary, as the retaining wall is too small; Mechanical workshop: the drain around the mechanical workshop is shallow, with overflows visible; Filter Plant: there are no dirty water trenches within the filter plant area; and ROM Stockpile: there are no dirty water trenches at the ROM Stockpile.
  - – The dirty water system at the Chrome Plant was also observed to be inadequate to contain spills, with significant overflows observed during the audit, and an incident reported by the plant on 1 July 2025, where the sump overflow could not be contained in the bund wall and spilled into the stormwater infrastructure. Severe wear and damage was reported by the concentrator team on the sump and pump. More frequent maintenance is required as significant amounts of silt were observed outside the bund wall and containment infrastructure.
  - – The PCD was designed to be operated dry; therefore water should be continuously pumped to the concentrator RWD. This is however not currently the case and the PCD provides an integral storage component in the Water Balance.

» **Mototolo Mine Shafts (Borwa and Lebowa):**

- ~ Air Quality:
  - – No evidence of daily inspections, servicing and maintenance of vehicles and equipment was provided.
- ~ Cultural Heritage:
  - – The access road to the existing Borwa Ventilation shaft, was constructed within less than the EMPr minimum buffer zone of 20 m from archaeological sites HP01 and HP03.
  - – Site BP01 (two unmarked graves) is within less than the 30 m (*EMPr minimum buffer zone*) from the constructed access road.
- ~ Compliance with other statutory requirements:
  - – the Borwa shaft borrow pit, where material was collected in the incorrect locations - *an SIB project is currently underway to rehabilitate the area*
  - – the Borwa and Lebowa shaft stormwater management infrastructure which are not compliant to GN704 - Redco have completed designs for the upgrades and these will be implemented starting Q4 2025
- ~ Fauna:
  - – No signage of red data faunal species' breeding areas were observed on site.
- ~ Flora:
  - – As no plant rescues were undertaken from the shafts' footprints, it is uncertain which species will be included in the revegetation portion of the rehabilitation. No evidence of plant surveys on the shaft footprints are available.
- ~ Groundwater:
  - – The 2024 Annual and Apr 2025 GCS Reports indicated non-compliances at the Borwa (BHMS3) and Lebowa (BHMN4) shafts, when compared to the WUL Requirements, with typically high nitrate concentrations evident. No evidence was provided of reporting of any incidents related to groundwater contamination at the shafts, nor of the implementation of management measures.
- ~ Soils and Land Capability:
  - – Areas of erosion and issues with stability of surface run-off control structures noted:
    - Borwa Shaft: rehabilitation of the borrow pit (*SIB project commenced*), lining of the dirty water channel, erosion repair along the access road, repair of the wash bay bund wall, implementation of the stormwater management infrastructure upgrades.
    - Lebowa shaft: erosion along the stormwater outlet, implementation of the stormwater management infrastructure upgrades.
  - – No topsoil stockpiles are available for rehabilitation on site.



- No concurrent rehabilitation is undertaken at either shafts, with no rehabilitation during the audit period.
- The 2025 IWWMP identified various areas available for rehabilitation at the shafts:
  - Borwa shaft borrow pit (*SIB project commenced*)
  - Borwa shaft decommissioned ventilation shafts
  - prospecting roads and disturbed footprints at both shafts
  - ventilation shafts at Lebowa shaft, based on the imminent closure of the shaft.
- Extensive hydrocarbon spills were observed at the TMM workshop areas at both shafts, specifically at the refuelling areas, which has also been reported in various internal and external audits during 2024-2025.
- None of the parked vehicles had drip trays underneath at either of the shafts and leaks were observed.
- Leaking vehicles have also been reported in previous internal and external compliance audits during 2024-2025.
- Spill kits were observed at the workshops, though the Borwa shaft spill kits are not labelled.
- Though oil was mostly stored in the designate oil bays, significant oil spills were observed at the shafts, with no evidence of clean-up using oil absorbents.

~ Surface Water:
- Stormwater management infrastructure non-compliances:
  - The channels and drains at both shafts' workshops are very shallow, damaged and filled with silt and litter, insufficiently sized and not sloped correctly, with overflows observed; the hardstands were also observed to be cracked and damaged. *Redesign of the inefficient water management systems are currently planned at both shafts, to ensure that clean and dirty water are separated and the infrastructure is compliant with Regulation 704 of the NWA.*
  - Borwa: an excessive amount of water reports to the Borwa sump, causing it to overflow and be ineffective; clean and dirty water are currently mixing at the Borwa shaft.
  - Lebowa: the July internal audit reported a significant oil spill at the oil separator, with the bund containing the initial volume, but it having to then be diverted via the diversion structures; *a Scope of Work was also issued and designs completed by Redco, to improve water management at Lebowa shaft and reduce the current risk of overloading the oil separator and the downstream system including the northern sump*.

~ Waste Management:
- The concrete slabs and bunded areas at both salvage yards have not been treated with a chemical resistant nor impermeable paint or material.

» **WRD embankment/DB North footprint** (*previously authorised for the co-disposal facility*)**:**

~ Biodiversity:
- No proof could be provided of permits for the relocation of TOPS and protected trees for the farm Helena 6 JT.
- The WRD embankment/DB North footprint is not currently included in Agreenco's scope of work for IAP eradication.

~ Groundwater:
- No seepage collection drains have been installed around the WRD embankment/DB North footprint.

~ Surface Water:
- As stated above, the 2025 RPM internal inspection report of the DB North footprint, recorded various areas of erosion, with no evidence provided on the construction of clean water diversion bunds prior to clearing, neither of the construction of downstream paddocks.
- No rehabilitation has been conducted in the WRD embankment/DB North footprint to date.
- No information was provided to the auditor on the design of stormwater measures in the WRD embankment/DB North footprint.
- Energy dissipation measures have not yet been implemented.

- No evidence was provided on the inspection and maintenance of stormwater management infrastructure.

~ Wetlands:

- The 2025 RPM internal inspection report of the DB North footprint reported various areas of erosion, with management measures still being implemented post clearing of the footprint.

6.2 CONCLUSION AND WAY FORWARD

It is the opinion of the auditor and the peer reviewer/auditor, that the 2021 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 the EMPr is reviewed and the 2019 and 2021 EMPrs are consolidated and updated, that the references to the co-disposal facility (*and any other infrastructure and activities no longer part of the mine plan*) be removed and updated to reflect the construction of the WRD embankment, and the current and planned activities on the Der Brochen North footprint, namely the stockpiling, crushing and screening of material excavated from the Der Brochen South Shaft terrace and the current and planned Der Brochen North infrastructure and activities.

It is furthermore recommended, as detailed in ***Tables 2-4*** and ***Section 6.1*** above, that actions be considered/developed to correct the remaining non-compliances.

ANNEX 1: Photolog of Evidence



Photo 1: Der Brochen (DB) North - parked equipment with drip tray underneath



Photo 2: Mareesburg Nursery



Photo 3: DB North - TOPS relocation area

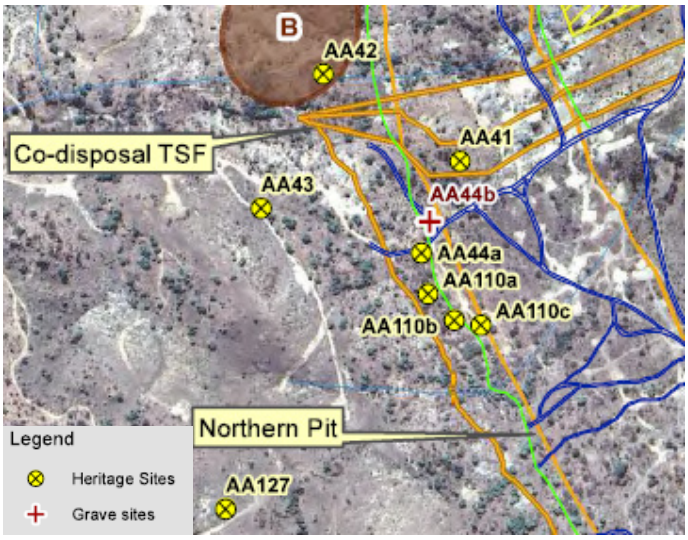


Photo 4: DB North - cultural heritage sites west of the footprint



Photo 5: MTSF - topsoil stockpiles



Photo 6: MTSF - erosion along the northern stormwater channel



Photo 7: MTSF - erosion along the access road due to a natural spring



Photo 8: MTSF - temporary measures to allow the natural spring to cross the access road



Photo 9: MTSF - erosion control where the spring enters the natural environment



Photo 10: MTSF - revegetated embankment



Photo 11: MTSF - SS contractor's yard: laydown area



Photo 12: MTSF - SS contractor's laydown area at the TSF construction site



Photo 13: MTSF - SS contractor's yard: diesel storage in bunded area



Photo 14: MTSF - SS contractor's yard: diesel spill collection drain and oil separator



Photo 15: MTSF - SS contractor's yard: bunded diesel refuelling station with drip trays



Photo 16: MTSF - SS contractor's yard: drip trays underneath parked equipment



Photo 17: MTSF - SS contractor's yard: bunded hazardous waste skip



Photo 18: MTSF - SS contractor's yard: Spill Kits



Photo 19: MTSF - erosion protection where the pipeline crosses drainage lines



Photo 20: MTSF - chemical toilets at the TSF construction site



Photo 21: MTSF - SS contractor's yard: bunded flammable substances cage



Photo 22: MTSF - SS contractor's yard: bunded hazardous substances cage



Photo 23: MTSF - SS contractor's yard: workshop



Photo 24: MTSF - dust plume



Photo 25: MTSF - SS contractor's yard: Water Bowser

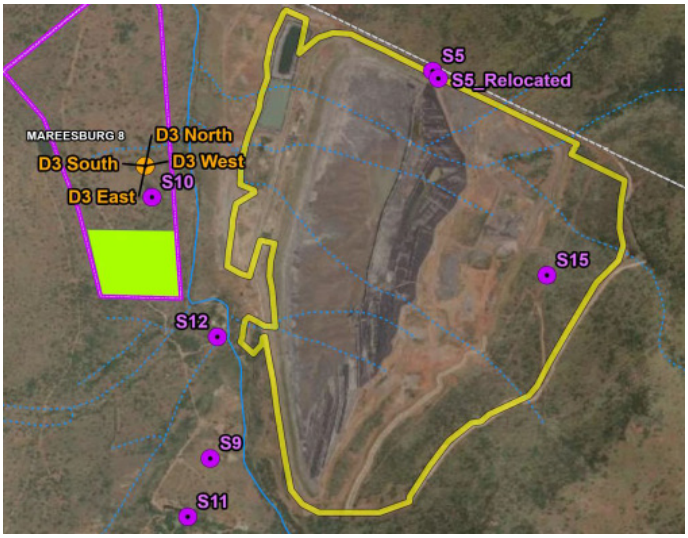


Photo 26: MTSF - DFO monitoring locations



Photo 27: MTSF - noise monitoring locations



Photo 28: MTSF - pipeline on plinths



Photo 29: MTSF - water monitoring locations



Photo 30: HTSF - grassed beach platform



Photo 31: HTSF - grassed and bare side slopes

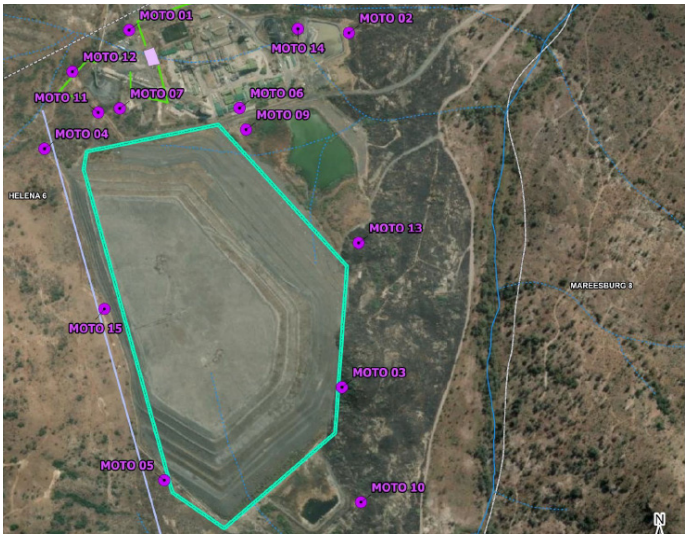


Photo 32: HTSF - DFO monitoring locations



Photo 33: HTSF - poor housekeeping

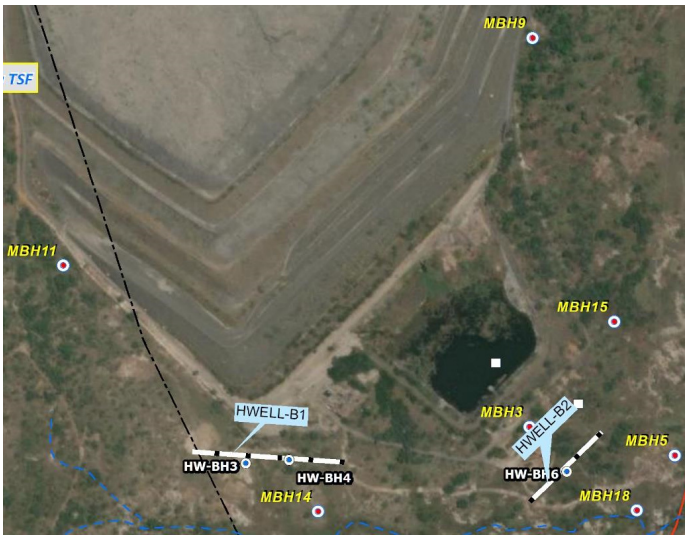


Photo 34: HTSF - boreholes and scavenger wells



Photo 35: MOTC - erosion control measures



Photo 36: MOTC - gabions at the clean water diversion culvert



Photo 37: MOTC - silted dirty water channels



Photo 38: MOTC - siltation at the PCD



Photo 39: MOTC - silted outlet valve and sump at the diesel refuelling area



Photo 40: MOTC - overflows at the silt drying beds



Photo 41: MOTC - mechanical workshop drain



Photo 42: MOTC - filter plant



Photo 43: MOTC - ROM stockpile



Photo 44: MOTC - Chrome Plant overflows





Photo 45: MOTC - hazardous waste bin and skip

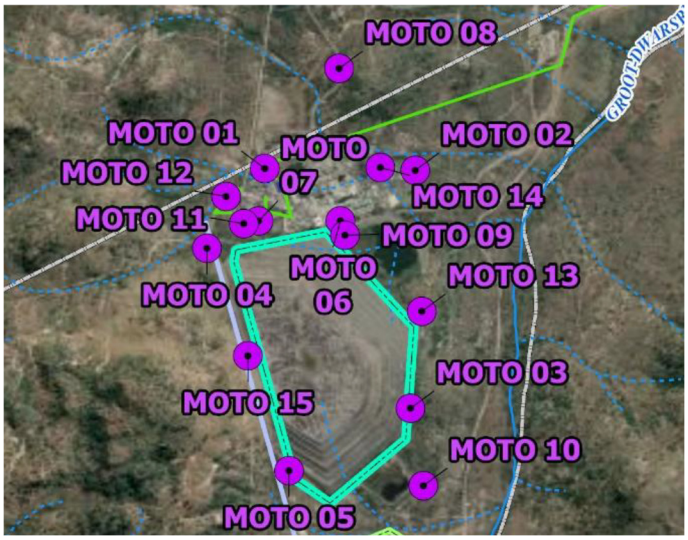


Photo 46: MOTC - DFO monitoring locations



Photo 47: MOTC - conveyors fitted with doghouse sheeting

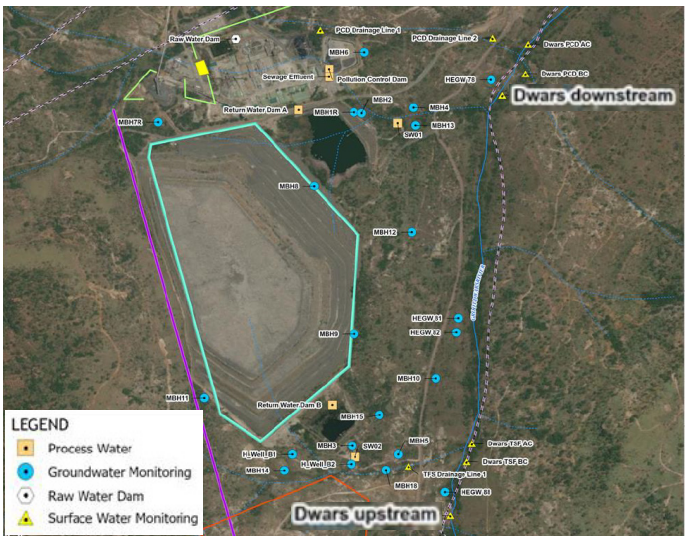


Photo 48: MOTC - water monitoring locations



Photo 49: MOTC - plant surrounded by vegetation + dust suppression on access road



Photo 50: MOTC - bunded oil storage



Photo 51: MOTC - bunded boilermaker paint store



Photo 52: MOTC - bunded diesel tank

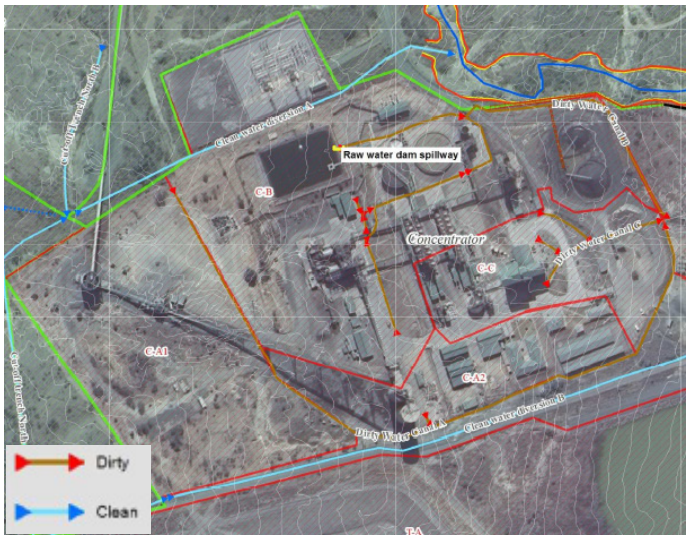


Photo 53: MOTC - stormwater management infrastructure



Photo 54: HTSF - aggregate used as erosion control along the access road



Photo 55: MOTC - gabions at one of the concentrator's main access road river crossings



Photo 56: MOTC - culvert at the concentrator access road river crossing



Photo 57: MOTM - Lebowa shaft - ventilation shaft



Photo 58: MOTM - Lebowa shaft - erosion at the stormwater outlet



Photo 59: MOTM - Borwa shaft workshop drains (overflows, shallow, damaged, silted, littered)



Photo 60: MOTM - Borwa shaft sump at diesel and oil storage area (overflows, damaged, silted)



Photo 61: MOTM - Lebowa shaft channels blocked with silt and debris



Photo 62: MOTM - Lebowa shaft diesel storage channel damaged, silted and overflowing

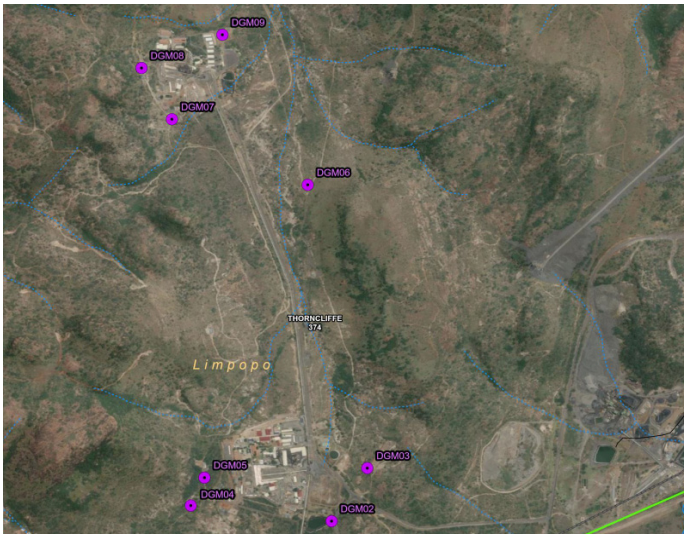


Photo 63: MOTM - DFO monitoring locations



Photo 64: MOTM - Borwa shaft waste management





Photo 65: MOTM - Lebowa shaft waste management



Photo 66: MOTM - Borwa shaft hydrocarbon spills



Photo 67: MOTM - Lebowa shaft hydrocarbon spills



Photo 68: MOTM - Borwa shaft: unlabelled spill kits



Photo 69: MOTM - Borwa shaft: Sewage Treatment Plant



Photo 70: MOTM - Lebowa shaft: Sewage Treatment Plant

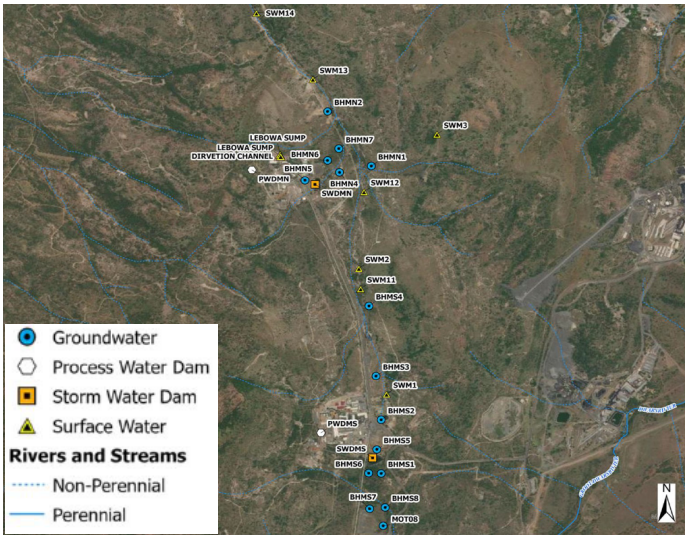


Photo 71 : MOTM - water monitoring locations



Photo 72: MOTM - Lebowa shaft: compulsory PPE sign

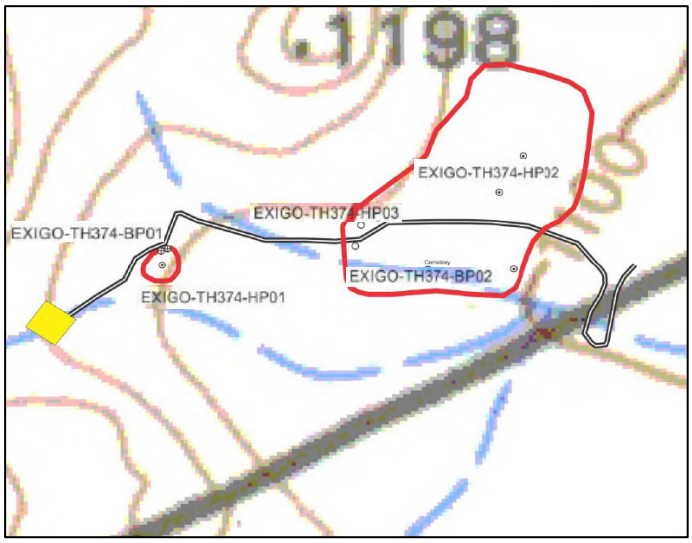


Photo 73: MOTM - Borwa Existing Vent Shaft: Heritage Sites Map (Exigo, 2014)



Photo 74: MTSF - SS contractor's yard: signs



Photo 75: MTSF - RWD hazard warning sign



Photo 76: DB North - cement mixing and spilling on bare ground



Photo 77: DB North - disposal of cement waste on bare ground



Photo 78: MOTC - domestic waste bins



Photo 79: MOTC - domestic waste skips



Photo 80: MOTM - Borwa Salvage Yard: hazardous waste skips with lids



Photo 81: MOTM - Borwa shaft: diesel and oil storage area with significant spills/leaks



Photo 82: MOTC - cracks in the laydown area's hardstand



Photo 83: MOTC - signs at the PCD entrance



Photo 84: HTSF - signs at the entrance



Photo 85: Lebowa shaft: signs at the water treatment plant entrance



Photo 86: Lebowa shaft: signs at the PCD entrance



Photo 87: Lebowa shaft: sign at the salvage yard entrance

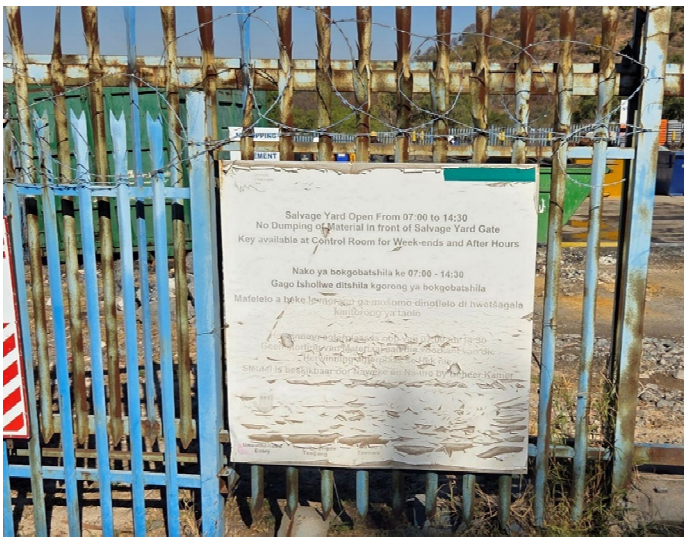


Photo 88: Lebowa shaft: sign on the salvage yard access gate



Photo 89: Red Data Species Signage at both shafts