

**Valterra Platinum Limited.: Twickenham
Platinum Mine – Final**

**Environmental Audit Report contemplated in Regulation 34 of
the EIA Regulations, 2014 published in terms of the NEMA**

Report date: 9 October 2025

Reference No.: LP 30/5/1/2/3/2/1/89 EM



Stewards



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*Influencing decisions since 2000 through identification, quantification and
mitigation of environmental, safety, health and compliance risks*

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1. Introduction

Twickenham Platinum Mine ("TPM") is operated on the Eastern Limb of the Bushveld Complex, approximately 35 km north-west of Burgersfort in the Sekhukhune District of the Limpopo Province on the farms Twickenham 114 KT, Hackney 116 KT, Mecklenburg 112 KT, Waterkop 113 KT, Surbiton 115 KT and Forest Hill 117 KT. TPM is expected to produce 160,000 ounces of refined platinum and 176,000 ounces of refined palladium at a steady-state production.

On the 6th of May 2013, the Department of Mineral and Petroleum Resources ("DMPR"), previously known as Department of Mineral Resources and Energy ("DMRE") issued a Directive to TPM requesting the approved Environmental Management Programmes ("EMPr") be consolidated into a single Consolidated EMPr in line with the Mineral and Petroleum Resources Development Act, 2002, (Act 28 of 2002) ("MPRDA"). The EMPrs that were consolidated are as follows:

- *Twickenham Platinum Mine: EMPr Vol. 1-3* (Report No. 287678/EMP-T, August 2002: Approved in January 2003);
- *Twickenham Platinum Mine: EMPr for Gravel, Sand, Soil and Clay Quarries* (Report dated September 2002: Approved January 2003);
- *Twickenham Platinum Mine: Amendment to the EMPr Vol. 1 - 2* (Report No. 313658/1, March 2003: Approved April 2003);
- *Twickenham Platinum Mine: EMPr Addendum for Borrow pits, Crusher and Concrete batch plants* (Report - Dated May 2003: Approved August 2003);
- *Twickenham Platinum Mine Addendum to the EMPr to include the Winze shafts:* (Report No. 313658/winze, May 2003: Approved October 2005);
- *Twickenham Platinum Mine: EMPr for the ongoing prospecting at TPM* (Report No. 0067699, July 2007); and
- *Rustenburg Platinum Mines Limited – Twickenham Platinum Mine: Environmental Impact Assessment Report and Environmental Management Programme in Support of the Application for a Mining Right* (Report No. ENV-EMP01-TPM, June 2010).

The Twickenham Platinum Mine: Consolidated Environmental Management Programme ("EMP") – Final Report, (DMR reference number: LP30/5/1/2/3/2/1 (89) EM) was approved by the DMR on 13 July 2017.

In September 2013, an amendment to the TPM EMPr that aligned with the MPRDA Regulations was submitted to the DMR, which included the mining of Pashaskraal and De Kamp farms. This EMPr was approved in December 2013 and did not form part of the EMPr consolidation.

From early January 2016, TPM went into care and maintenance. No mining is taking place, with the activities on site limited to surface infrastructure maintenance, administration, groundwater pumping and underground electrical repair.



On the 8th of May Anglo American Platinum Limited informed the DMPR that the Anglo American plc shareholders voted in favour of the company's demerger of its majority interested in Anglo American Platinum at its AGM on 30th April 2025. Therefore, the name change is as follows - Rustenburg Platinum Mines Limited ("RPM") which is the wholly owned subsidiary of Valterra Platinum, owns and operates Twickenham Platinum Mine.

The EMPr still refers to Anglo American Platinum Limited because of the recent demerger, Therefore, necessary amendments will be made.

2. Regulatory Requirements for Auditing and Reporting

In terms of section 24N of the National Environmental Management Act 107 of 1998 ("NEMA") the holder of an environmental authorisation "*must manage all environmental impacts in accordance with his or her approved environmental management programme*" and "*monitor and audit compliance with the requirements of the environmental management programme*".

Regulation 34 of the Environmental Impact Assessment ("EIA") Regulations (GN R982 of 4 December 2014 as amended) provides as follows "*Auditing of compliance with environmental authorisation, environmental management programme and closure plan*:"

- 34 (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 and 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 sub regulation (1) must-*
- (a) *be prepared by an independent person with the relevant environmental auditing expertise;*
 - (b) *provide verifiable findings, in a structured and systematic manner, on-*
 - (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; and*
 - (d) *be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation.*
- (3) *The environmental audit report contemplated in sub regulation (1) must determine-*
- (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; and*
- (b) *the level of compliance with the provisions of environmental authorisation, EMPr or closure plan.*
- (4) *Where the findings of the environmental audit report contemplated in sub regulation (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 or EMPr or closure plan;*
- the holder must, when submitting the environmental audit report to the competent authority in terms of sub regulation (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 recommendation in terms of sub regulation (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.”*

3. Objectives of the environmental audit

The objectives of this Regulation 34 audit are to determine TPM's compliance with the EMPr approval letters to:

- (a) report on-
- (i) the level of compliance with the commitments and conditions of the EMPr approval letter; and
- (ii) the extent to which the avoidance, management and mitigation measures provided for in the EMPrs, achieve the objectives and outcomes of the EMPrs.
- (b) identify and assess any new impacts and risks as a result of undertaking the activity;
- (c) evaluate the effectiveness of the EMPrs;
- (d) identify shortcomings in the EMPrs; and
- (e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPrs.



4. Scope and purpose of the environmental audit

The purpose of the audit is to determine the level of compliance with the provisions of the EMPr approval letters. TPM is operating in accordance with the following EMPrs:

- *Twickenham Platinum Mine: Consolidated Environmental Management Programme (EMP) – Final Report*, dated August 2014 (DMR reference number: LP30/5/1/2/3/2/1 (89) EM); and
- *Twickenham Platinum Mine: Consolidated Environmental Management Programme (“EMP”) – Final Report*, (DMR reference number: LP30/5/1/2/3/2/1 (89) EM) *Approval Letter*
- *Pashaskraal and De Kamp Environmental Management Programme – Approval Letter* (DMR reference number: LP30/5/1/2/2/89 (MR)).

An audit has been undertaken in respect of the above-mentioned EMPr approval letters as required in terms of the legislative framework referred to above. A separate audit has been undertaken to assess compliance to the commitments in the EMPrs. This audit report accordingly serves the purpose of fulfilling the requirements of NEMA and the EMPr approval letters.

The audit review period for this Regulation 34 audit is June 2024 to May 2025.

5. Methodology adopted for the environmental audit

The audit was conducted by reviewing and abstracting the commitments (management and mitigation measures) and conditions from the EMPr approval letter and including it in the commitment tables as contained in Chapter 6 of this audit report.

In addition to assessing the compliance to commitments and conditions, the adequacy of the information was also assessed through evaluating site activities and verifying such against the descriptions and risk assessment provided in the EMPrs, and whether location specific risks and the necessary specialist assessments had been considered.

5.1. Audit team

Team Member	Responsibilities
Lesley van Graan	Desktop documentation review, and compilation of report and site verification.
Nirvasha Rajdeo	Site verification.
Jan Nel	Technical and quality reviewer.

Lesley van Graan

Lesley is a Senior environmental consultant at Shangoni that holds a M.Sc. in Environmental Science with Aquatic Ecosystem Health from the North-West University and has 4 years' experience in the Environmental Consulting field. During this time, she gains a vast understanding of the National Environmental Management Act, National Water Act, and associated legislations. Lesley has gained



experience in report writing that includes Environmental Impact Assessments, Basic Assessments, Environmental Management Programmes reports and Amendment thereof and Integrated Water Use Licence Applications for projects related to Renewable Energy, Non- mining as well as Mining.

Lesley also has also gained 4 years of experience in conducting Environmental Audits, such as Water Use Licence Audits, Environmental Authorisation audits, Environmental Management Programme Performance Assessment audit and Atmospheric Emissions Licence audits. To date she has completed more than 50 audit reports. She also has 2 years' experience in Water Quality Assessment.

Nirvasha Rajdeo

Nirvasha is a qualified Environmental Scientist (BSc. Hons) with 7 years' experience in the environmental field. She is currently employed as an Environmental Consultant within the Environmental Authorisation Department at Shangoni. Her key focus is on strategic environmental assessment and advice; management and co-ordination of environmental projects, which includes integration of environmental studies and environmental processes into larger engineering and mining-based projects and ensuring compliance to legislation and guidelines; the identification of environmental management solutions and mitigation/risk minimising measures; Water Use License processes and compliance auditing and in heading IWWMP and Water balance updates. Extensive industry experience was gained during her employment as an Environmental Consultant and Environmental Control Officer during 2019-2023. Her capabilities to date have permitted for the growth and understanding regarding the fundamentals around the National Environmental Management Act and the National Water Act. These overarching legislations have also allowed for the experience in reporting and auditing management which includes Renewable Energy (EMPr/EA/WUL) Audits, Scoping Reports, Environmental Impact Assessments (EIA), Basic Assessment Reports, Water Use Licence Applications (WULA), Technical Reports and Environmental Management Programme Reports (EMPr).

Jan Nel

Jan is the Operations Director at Shangoni and holds a Master's Degree in Environmental Management. He has been actively involved in environmental management for the past 30 years focussing on the mining industry in providing assistance with EMP Compliance, Environmental Impact Assessments (EIA), Financial Provision Calculations, Closure Plans, Rehabilitation Plans, Environmental Management Programme Reports (EMP) and EMP compliance Assessments. He is furthermore experienced in environmental management through third party certification audits as well as Environmental Management System (EMS) implementation and has more than 10,000 audit hours. Jan is also involved in TC 207 local in South Africa and the International ISO TC207 committee as well as the Strategic leadership Group of ISO TC207 focussing on international trends in environmental management. Jan represents Shangoni on the board of Shangoni Laboratory services.



5.2. Audit execution

This audit comprised of:

- A site visit undertaken, 21 May 2025, for site observation purposes.
- Interviews conducted with relevant mine personnel and where relevant contract personnel for the purpose of assessing documented evidence of compliance with the auditing criteria.
- Compilation of a photographic record of the areas visited during the site audit, which reflected the state of the environment and operations at the time of the site visit.

5.3. Rating of findings

Compliance category	
Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.	 Compliant
A statement made on a subjective basis (based on isolated instances noted) where deviation to the compliance requirements were noted. These instances do not pose a material risk to the organisations ability to demonstrate compliance. Such findings require action to ensure full compliance. Observation findings are further raised in instances where compliance cannot be assessed as the condition, commitment and/or mitigation measure is incomplete. In such instances, further consultation with the Competent Authority is required.	 Observation
The failure to comply with, or fulfil the requirements of an applicable condition, commitment and/or mitigation measure.	 Non-Compliant
The condition, commitment and/or mitigation measure is not applicable. A "Not applicable" finding is also noted in event where: • The condition, commitment and/or mitigation measure is not yet relevant but may still be relevant for future activities; or • The condition, commitment and/or mitigation measure relates to an activity / action / requirement that falls outside of the period applicable to this audit.	 Not Applicable
The condition, commitment and/or mitigation measure that does not require any specific action.	 Noted

5.4. Assumptions, uncertainties and gaps in knowledge

Although all reasonable attempts were made to verify comments made during interviews held through further record/documentation assessments, it is assumed that such comments provided are a true and accurate reflection, unless otherwise indicated in the report. In an event where insufficient information



was provided to support compliance, the auditors' general approach was to indicate that such commitment could not be verified. Such detail is provided in Chapter 6 of this report.

Observations made represent the *status quo*, although where applicable and supported through records and interviews, commitments for further actions planned by the mine have been considered.

6. Environmental audit

The content of this Chapter aims to indicate the mitigations measures and conditions that were provided for within the approved EMPr approval letters to minimise the significance of the impacts identified, and to indicate the progress made by the operation regarding the implementation of- and compliance to- the mitigation measures and conditions. Objective evidence as requested and reviewed, in conjunction with observations made during the site audit, were used to determine the operation's implementation of- and compliance to- the mitigation measures and conditions.



6.1. Twickenham Platinum Mine: Consolidated Environmental Management Programme (“EMP”), (DMR reference number: LP30/5/1/2/3/2/1 (89) EM) Approval Letter

Nr	Authorisation Condition	Compliance review and rating
1 Scope of Approval		
1.1	The holder of the approval shall be responsible for ensuring compliance with the conditions contained in the approval. 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 approval letter.	TPM acknowledges and takes note of the requirements of this condition. 
1.2	Any changes to, or deviation from the project description set out in this approval letter must be approved in writing by this Department before such changes or deviation may be affected. 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 approval to apply for further authorisation in terms of the EIA Regulations.	TPM is currently in care and maintenance. Consultation with the then Department of Mineral Resources and Energy (“DMR”) was conducted on 01 March 2016 to determine the correct procedure to follow regarding placing TPM in care and maintenance. As per the report <i>Rustenburg Platinum Mine Limited, Twickenham Platinum Mine: 2024 Annual Update of the Care and Maintenance Plan</i>, dated 10 October 2024 compiled by J9 Environmental CC, the outcomes from the meeting with the DMR were: • “the DMR stated that no formal Directive would be issued to TPM to compile a Care and Maintenance Plan (CMP) • an independent environmental site inspection and impact assessment was required: and • TPM was required to submit a letter to the DMR that confirms the status of: ○ All environmental impacts during C&M related to the current approved activities (as per the approved EMPRs), as well as the mitigation and management measures proposed for these impacts; ○ all environmental impacts during C&M related to the Research and Development (R&D) project activities, including an indication if the R&D activities trigger any listed activities; and ○ a commitment to proceed with the annual financial provision and annual environmental performance assessments; J9 CC t/a J9Enviro® conducted a site inspection on 25-26 April 2016 and compiled the original CMP, as per the above commitments to the DMR. The 2016 CMP was submitted to the DMR in June 2016. Follow-up independent environmental site audit and impact assessments were conducted annually since 2017, including this latest 2024 update. The updated CMP was submitted to DMR on 4 December 2024. 
1.3	The activities, which are authorised, may only be carried out at the property (ies) indicated on the approved EMPr.	A review of the approved EMPr as well as the site observations confirmed that all activities associated with TPM are occurring on the properties as provided for within the approved EMPr. 
1.4	Where any of the holder of the approval contact details change including name of the responsible person, physical or postal address/ or telephonic details, the holder of the approval must notify the Department as soon as the new details become known to the holder of the approval letter.	A review of the Letter to DMPR with heading reading “Notification of name change from Anglo American Platinum to Valterra Platinum Limited: Twickenham Platinum Mine Paschaskraal Environmental Management Programme Approval and No. 6/2/2/609” indicated that the DMPR was notified of the name change from Anglo American Platinum to Valterra Platinum Limited. 



Nr	Authorisation Condition	Compliance review and rating
		 VALTERRA PLATINUM Rustenburg Platinum Mines Limited TWICKENHAM PLATINUM MINE R37 Greater Tlatsie 1029 South Africa SECURITY CLASSIFICATION Department of Minerals and Petroleum Resources Regional Manager 101 Dorp Street Polokwane 1120 Per email: azwihangwisi.mulaudzi@dmre.gov.za Dear Azwihangwisi, <u>Notification of name change from Anglo American Platinum to Valterra Platinum Limited: Twickenham Platinum Mine Paschaskraal Environmental Management Programme Approval and No. 6/2/2/609</u> I hope this message finds you well. With reference to the appended letter dated 8th May 2025, submitted to the Regional Manager of Department of Mineral and Petroleum Resources, Valterra Platinum has been trading under the new name as from 28th May 2025. Letter to DMPP of the name change from Anglo America Platinum to Valterra Platinum
1.5	This approval 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)	TPM is aware of and understands this condition. 
1.6	The holder of approval must ensure that all areas where the authorised activities occur have controlled access to ensure safety of people and animals.	Site observation confirmed that all areas of TPM are fenced, and access controlled to prevent unauthorised access.   Access controlled and fenced areas. 
2 Commencement of the Activity (ies)		



Nr	Authorisation Condition	Compliance review and rating
2.1	In order to ensure safety, all employees must be given the necessary personnel protective equipment	Personnel protective equipment ("PPE") is provided to all employees at TPM. Signage is also present across the site to indicate what the correct PPE is to be worn within the respective areas.  <i>Signs indicating the relevant PPE that needs to be worn.</i> 
2.2	This approval must be provided to the site operator and the requirements thereof must be made fully known to him or her.	It is unknown as to whom is being referred to as the "site operator". This approval letter is available at the Environmental Team located at the TPM offices and is also available as an electronic copy on the shared drive, to which all employees have access. The relevant heads of the different departments are aware of the EMPr approval. Where applicable, employees and contractors are provided with a copy of this approval letter. 
2.3	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.	
2.4	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.	Site observation and conversations with mine personnel indicated that there are currently no construction activities taking place at Hackney or Twickenham shaft. 
2.5	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.	No additional vegetation clearance took place in the review period. 
2.6	Vegetation clearance must be limited on areas where the individual activities will occur, and mitigation measures must be implemented to reduce the risk of erosion and alien species invasion.	
2.7	The holder of approval 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 07 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.	Conversations with mine personnel and a review of the environmental incident register indicated that no endangered species have been cut or damaged during the audit review period. As mentioned TPM is currently in care and maintenance and should any removal of indigenous or protected species be needed, TPM will apply for the necessary permits. 
2.8	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.	As mentioned, site observation and TPM personnel confirmed that no construction activities are taking place on site. Therefore, no vegetation clearance took place and no concerns within a drainage line were noted. 
2.9	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	A <i>Hazardous Waste Management Procedure</i> and a <i>Hazardous Materials Management Procedure</i> have been developed. These procedures include actions to be implemented to prevent pollution resulting from spillages and actions to be implemented during a leak/spill (emergency management plan). 



Nr	Authorisation Condition	Compliance review and rating
	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 following is included in the <i>Hazardous Waste Management Procedure</i> under section 9.16: <i>“9.16.3 Where Hazardous Materials are to be disposed of in a controlled manner outside of the Mine’s lease area, such disposal will be managed by the Environmental Department under the specified contractual agreement.</i> <i>9.16.4 The site Waste Management System for the re-use, recycling or disposal of products shall be adhered to and applied, for example, storage, labelling, transport, disposal location, quantity and records.</i> <i>9.16.5 Records of disposal (safe disposal certificates) of Hazardous Materials shall be retained by the Environmental Department.”</i> As indicated above no signs of soil contamination was observed during the site visit.
2.10	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,	A <i>Waste Management Strategy</i> is implemented at TPM and includes measures for waste minimisation, reduction, recycling and disposal. No building rubble is currently generated at TPM, therefore, no backfilling is undertaken.  Recycling station at the office block. - Hackney Shaft  Recycling taking place at the salvage yard. 
2.11	The holder of the approval must note that 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 approval reads through and understand the legislative requirements pertaining to the project. It is the holder of approval 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	TPM understands the duty or care principles and requirements. With regards to training, all employees and contractors of TPM are required to undertake a mandatory induction on an annual basis as well as after returning to work from a leave of absence (records available for review). Further, training dependent on the employees’ responsibilities, is conducted as per the <i>Competence, Training and Awareness Procedure (TWI-EPR-OHS-PRO-0032)</i>. Records of training and induction are available for review. 



Nr	Authorisation Condition	Compliance review and rating
2.12	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.	As TPM is in care and maintenance, no construction activities or vehicles are on site at this stage. No concerns regarding soil contamination were observed during the site visit. 
2.13	Residents (if any) on the property (ies) and surrounding areas must be informed if any unusually noisy activities are planned.	TPM is in care and maintenance and no unusually noisy activities are undertaken that would require TPM to notify surrounding residents and communities. 
2.14	Dust suppression measures must be implemented on all exposed surface to minimize and control airborne dust	Dust suppression is only undertaken when required. As described above, TPM is in care and maintenance with limited transport (of equipment) and movement on gravel access roads. 
2.15	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 evidence was present that the mixing of cement, concrete, paints, solvent, sealants and adhesive had been conducted on bare soil. 
2.16	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)	All employees and contractors of TPM are required to undertake a mandatory induction on an annual basis as well as after returning to work from a leave of absence. Further, training is conducted as per the <i>Competence, Training and Awareness Procedure (TWI-EPR-OHS-PRO-0032)</i> . Cultural and heritage aspects are included in the training. 
2.17	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.	Should any heritage or cultural remains be uncovered, all activities surrounding the uncovered site will immediately cease and the environmental department will be notified of the finding. The Environmental Coordinator will then contact a certified heritage specialist and determine the appropriate actions to be taken. 
2.18	Care must be taken to ensure that the material and excavated soil required for backfilling are free of contamination from hydrocarbons	This condition is deemed not applicable, as no backfilling is undertaken at TPM. 
2.19	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 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.	Chemicals, solvents and hydrocarbons are stored within a concrete lined and bunded area. TPM has developed and implemented a <i>Hazardous Waste Management Procedure</i> and a <i>Hazardous Materials Management Procedure</i> . These procedures include measures to be implemented during the storage of hazardous substances (i.e. bunding). Chemicals and hazardous substances are stored in accordance with these procedures. The <i>Hazardous Materials Management Procedure</i> also includes actions to be implemented to prevent pollution resulting from spillages and actions to be implemented during a leak/spill (emergency management plan). Site observations did not identify concerns regarding the handling and storage of chemicals or any spills resulting therefrom. 



Nr	Authorisation Condition	Compliance review and rating
		 <i>Bunded storage area of used hydrocarbons.</i>
2.20	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	Mine personnel confirmed that all chemical toilets that were underground have been removed due to the mine currently being in care and maintenance. It was confirmed that there are a sufficient number of toilets on site. The chemical toilets are serviced by an external contractor (Letsogaphulong (Pty) Ltd) with safe disposal certificates issued to the mine. TPM has two operational sewage treatment plants, namely Central Sewage Treatment Plant and Mopetsi Sewage Treatment Plant. A third sewage treatment plant, Serafa Sewage Treatment Plant, is currently not operational. Treated effluent from the Central Sewage Treatment Plant is disposed into the evaporation dam whereas treated effluent at Mopetsi Sewage Treatment Plant is stored in an evaporation dam and used for irrigation if required. 
2.21	The holder of approval 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)	TPM has been issued with a water use licence ("IWUL") Licence No. 27/2/2/B571/5/1) on the 31st of March 2021 for the water use activities undertaken at the operations. No new activities are taking place that will possibly trigger a listed activity under section 21 of the National water Act. 
2.22	This approval does not purport to absolve the holder of approval from its common law obligations towards the owner of the surface of land affected.	TPM is aware of and understands this condition. 
2.23	The holder of approval must ensure that rehabilitation of the disturbed areas caused by operation at all times comply with the approved EMPr.	This condition refers to decommissioning and closure activities, therefore deemed not applicable. As mentioned TPM is in care and maintenance since 2016. 
2.24	This approval 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.	TPM is aware of and understands this condition. 
2.25	The holder of approval 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	Two waste rock dumps are located at TPM, one at Hackney Shaft and one at Twickenham Shaft. Both waste rock dumps are situated within the footprint of the approved EMPr. The footprint area of both WRDs is currently being reduced due to the crushing of WRD for a local community project. No tailings facility has been constructed at TPM. 

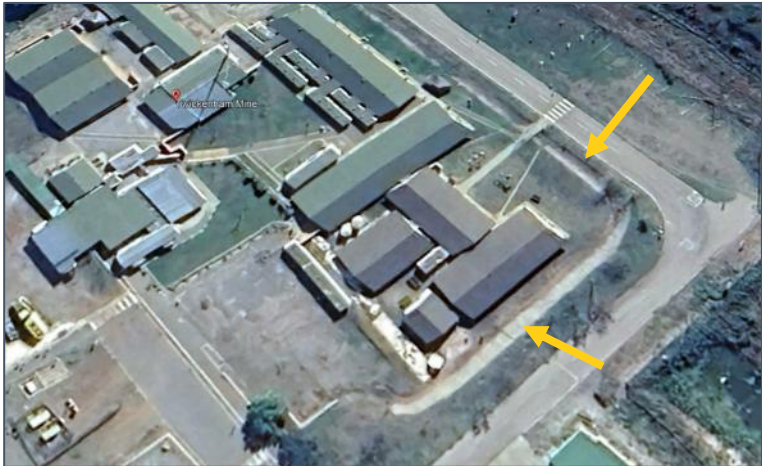


Nr	Authorisation Condition	Compliance review and rating	
			<i>Waste rock dump at Hackney shaft</i> <i>Waste rock dump at Twickenham shaft</i>
2.26	The holder of approval must note that in terms Section 20 of the National Environmental Management: Waste Act, 2008 (Act No.59 of 2008), no person may commence, 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.	TPM is aware of and understands this condition.	
2.27	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.	TPM is aware of and understands this condition.	



Nr	Authorisation Condition	Compliance review and rating		
2.28	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	As per site observations, skips are located at various areas throughout the mine and are kept on concrete lined areas. The skips have been fitted with lids, to prevent rain and sun from getting in contact with the waste.		Waste bins and skips located at the Hackney Shaft workshop area – Concrete lined 
		TPM has been placed under care and maintenance, with limited additional budget. Therefore, the skips have been fitted with lids, to prevent rain and sun from getting in contact with the waste. Due to the size of the salvage yard TPM has implemented the duty of care requirement, that doesn't require the salvage yard of this size to be roofed. Although the construction has commenced to line section of the salvage yard, the roof hasn't been constructed yet. Although the duty of care requirements is followed, this condition requires that the Salvage yard be roofed. Therefore, the requirement as per this EA commitment have not been fully met, and an "Observation" finding is recorded.		Waste storage area at Hackney Shaft Salvage Yard 
2.29	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 into contact with the waste and must be diverted away from the storage site	As described above, TPM has developed and implemented a <i>Hazardous Waste Management Procedure</i> and a <i>Hazardous Materials Management Procedure</i> . These procedures include measures to be implemented during the storage of hazardous substances (i.e. bunding). Chemicals and hazardous substances are stored in accordance with these procedures. No concerns were noted regarding bund walls and the capacity thereof during the site observations.		
2.30	Should there be any conflicting conditions between this EA and other approval granted by other authorities, it is upon the holder of EA to bring it to the attention of the Department for resolution	TPM is aware of and understands this condition.		
3. Management of Operation				



Nr	Authorisation Condition	Compliance review and rating
3.1	A copy of the approval letter and EMPr must be kept at the property or on-site office where the activity (ies) will be undertaken. The approval letter 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 EA who works or undertakes work at the property (ies)	The EMPr and the EA approval letter are kept at the Environmental Team's offices in hardcopy and electronic formats are also kept on the TPM shared drive, to which all employees have access to. These documents are available to an official upon request. 
3.2	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.	Where applicable, dependent of the task to be undertaken, specific EMPr requirements pertaining thereto, is made available to contractors and employees as part of the contractors' pack or induction and training. TPM takes note of the submission of any updates or amendment to the Department. 
3.3	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.	TPM has implemented several storm water management measures as observed during the site audit and as per <i>The Twickenham Platinum Mine Surface Water Specialist Report</i> , dated November 2017 and prepared by SRK Consulting. No concerns regarding the stormwater channels were observed during the site visit.  <i>Stormwater trench at Hackney Shaft google earth view</i> 
3.4	A buffer zone of 100 metres between the activity (ies) and the residential areas, cemeteries or burial grounds must be clearly demarcated and maintained.	All activities at TPM are situated more than 100 m from residential areas. From a review of the Consolidated EMPr, no graves are situated within the TPM infrastructure footprint: <i>"Formal graves were identified close to homesteads, however, this is outside the extent of TPM infrastructure footprint"</i> . 
3.5	The holder of the approval must prevent nuisance conditions or health hazards, or the potential creation of nuisance conditions or health hazards	TPM is aware of and understands this condition. 
3.6	The holder of the approval must ensure that all non-recyclable waste is disposed of at waste management facilities licensed to handle such wastes and all recyclable waste are collected by licensed waste management facilities for recycling, reuse or treatment.	All general waste generated at TPM is collected by a contractor (Bauba Maruma) and disposed of at the Burgersfort landfill site (disposal certificates available). Waste separation is being practiced by TPM (conducted at the salvage yard) and waste is recycled by the contractor. Hazardous waste is collected and disposed of by the appointed contractor, EnviroServe (safe disposal certificates are available). All medical waste is collected and disposed of by - thermal Retort technologies (Pty) Ltd, safe disposal certificates was presented during the audit reviewed period. 
3.7	The holder of the approval 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 effluent that may cause pollution is being diverted to the sewer. This condition is not applicable to the current operations at TPM. 
3.8	Non-compliance with any condition of this approval or EMPr may result in the issuing of a directive in terms of section 28 and or a compliance notice in terms of section 31 L of NEMA	TPM is aware of and understands this condition. 



Nr	Authorisation Condition	Compliance review and rating
3.9	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.	No concerns with activities taking place outside the approved TPM footprint were observed during the site visit. 
3.10	Erosion and soil loss must be prevented by minimizing the construction site exposed to surface water runoff. Where necessary erosion stabilizing action such as gabions or re-vegetation must be implemented to prevent further habitat deterioration.	Site observation confirmed that there are no erosion or soil loss occurring due to construction activities taking place at TPM. 
3.11	The holder of the approval must ensure that all personnel who work with hazardous waste are trained to deal with these potential hazardous situations so as to minimize the risk involved. Records of training and verification of competence must be kept by the holder approval.	All employees and contractors of TPM are required to undertake a mandatory induction on an annual basis as well as after returning to work from a leave of absence (records available for review). Further, training dependent on the employees' responsibilities, is conducted as per the <i>Competence, Training and Awareness Procedure (TWI-EPR-OHS-PRO-0032)</i> . Records training and induction were made available for review. 
3.12	In order to prevent nuisance conditions, the holder of the approval must ensure that all storage skips and bins are not overfilled	Full waste skips and bins are taken to the salvage yard for further separation. TPM has appointed a hazardous waste contractor, EnviroServ, who has placed a permanent employee at the salvage yard to ensure all waste are separated accordingly and to manage the waste removal on stie. 
4 Reporting to the Department		
4.1 The holder of approval must:		
4.1.1	Submit and 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 being adhered to;	This environmental Regulation 34 audit report serves the purpose of fulfilling compliance to this condition. All requirements as contained in these conditions are included in this audit report. 
4.1.2	Identify and assess any new impacts and risks as a result of undertaking the activity/ies, if applicable;	
4.1.3	Identify shortcomings in the EMPr/closure plan, if applicable;	
4.1.4	Identify the need, if any, for any changes to the management, avoidance and mitigation measures provided for in the EMPr/closure plan;	
4.1.5	If applicable, specify that the corrective action/s taken for the previous audit's non-conformities, was adequate;	
4.1.6	Specify the name of the auditor; and	
4.1.7	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.	TPM personnel indicated that no complaints were received during the audit review period. 
4.2	The holder of the approval 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.	TPM's liability assessment was performed in the <i>Anglo American Platinum 2024 Closure Liability Assessments – Twickenham Mine</i> compiled by WSP Group Africa (Pty) Ltd. The assessment included master rates obtained from industry. 
4.3	The holder of the approval must notify 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.	Spills at the sewage treatment plants are reported and managed according to the <i>Issues and Incidents Management Procedure, (MS-CA-CTY-PRO-0002)</i> and logged on Enablon. 



Nr	Authorisation Condition	Compliance review and rating
4.4	The holder of the approval 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:	Incidents are also assigned to a person for corrective action as per the <i>Incident Non-conformity and Corrective Action Procedure (reference number TWI-MIN-SHE-PRO- 0013)</i> last reviewed 16/06/2021. No incidents that require reporting occurred during the audit assessment period.
4.4.1	Correct the impact resulting from the incident	
4.4.2	Prevent the incident from causing any further impact; and	
4.4.3	Prevent a recurrence of a similar incident	
5 Site Security and Access Control		
5.1	The holder of the approval 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	Fencing and access control have been implemented around the shaft areas (Twickenham and Hackney shafts). Access to the general community is strictly prohibited. No concerns in this regard were identified.  Access control at Hackney Shaft
6 Commissioning and Decommissioning		
6.1	The commissioning and decommissioning of individual activity within the overall listed Prospecting activity must take place within the phases and timeframes as set out in EMP or EMPr	This condition is deemed not applicable, as no prospecting activities are currently being undertaken at TPM.
7 Site Closure		
7.1	The holder of approval 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	TPM is aware of and understands this condition. TPM is currently in care and maintenance.
7.2	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	TPM is aware of and understands this condition.



Nr	Authorisation Condition	Compliance review and rating
7.3	No exotic plants may be used for rehabilitation purposes only indigenous plant can be utilized for rehabilitation purposes	This condition refers to site closure, and rehabilitation. No rehabilitation activities have commenced, as TPM is in care and maintenance and is awaiting the outcome of the feasibility study. 
7.4	The holder of approval remains responsible for any environmental liability, pollution or ecological degradation, the pumping and treatment of extraneous water, compliance with the conditions of EA 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	TPM is aware of and understands this condition. 

6.2. Pashaskraal and De Kamp Environmental Management Programme Approval Letter (DMR Reference Number LP 30/5/1/2/2/89 (MR))

Nr	Authorisation Condition	Compliance review and rating
1	The approval does not purport to absolve Anglo American Platinum Limited from its common law obligations towards the holder of the surface rights	TPM is aware of- and understands this conditions. 
2	This approval 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 whatsoever	
3	The environmental management shall conform to the Environmental Management Programme as approved	The Pashaskraal and De Kamp projects have not yet commenced. Compliance to the commitments of this EMPr could not be assessed. 
4	Mining activities shall conform to all relevant legislations, especially the National Water Act, 1998, as well as the Mine Health and Safety Act, 1996 and such other conditions as may be imposed by the Chief Director or any other officer of this office, duly authorized thereto;	
5	Rehabilitation of the disturbed surface caused by mining activities shall comply with the provisions of this programme;	
6	A financial provision provided in terms of regulation 54(2) of the Act must annually be adjusted to conform to the above-mentioned mining activities	
7	A performance assessment, monitoring, and evaluation report must be submitted annually to this office or as determined by the Regional Manager, or at any other time that an officer of this office, duly authorized thereto requests	A Regulation 34 audit was undertaken by Shangoni Management Services (Pty) Ltd. on 21 May 2024. Proof was provided to confirm that this Regulation 34 audit report was submitted to the Regional Manager on the 04 December 2024. This audit report will also form part of this year's (2025-2026) annual performance assessment as required in the condition. 
8	Any alteration or deviation from this programme shall be submitted to the Chief Director for approval;	TPM is aware of- and understands this conditions. 



Nr	Authorisation Condition	Compliance review and rating
9	A copy of the Environmental Management Programme must always be available on site for inspection by duly authorized officers.	The EMPr and this approval letter are kept at the Environmental Team's offices in hardcopy and electronic formats. The EMPr and approval letter are also kept on the TPM shared drive, to which all employees have access to. The documents are available to an official upon request. 
10	The attached comments from the sub directorate: Mine Health & Safety; Department of Economic Development, Environment and Tourism; Department of Agriculture and the Department of Water Affairs form part of this approval and they should be adhered to.	No additional comments have been received from the aforesaid Departments. 
11	Ga- Phasha Platinum Mine (Pty) Ltd and Anglo American Platinum Limited shall complete the Transfer of Environmental Liability Form. The former shall simultaneously apply for a closure certificate in terms of section 43 of the said Act.	No evidence was provided to determine if Ga-Phasha Platinum Mine (Pty) Ltd. has applied for a closure certificate in terms of section 43 of the said Act, however, since this part of the condition does not apply to TPM specifically, a "Not Applicable" is recorded. 



7. Discussion of results

During the audit, a single observation was recorded, namely that the salvage yard at Hackney Shaft is not fitted with a roof. Discussions with TPM personnel confirmed that, due to the size of the salvage yard, TPM is applying the duty of care requirements rather than the norms and standards requirements prescribed in the EA. It is further recommended that this condition be discussed with the DMPR, to either be amended or granted exemption from being roofed while TPM is under care and maintenance.

In addition, TPM is currently under care and maintenance. Accordingly, the conditions relating to decommissioning and closure, as outlined in the EA, are not presently applicable to the site. Based on the evidence reviewed, TPM demonstrates a high level of compliance with the applicable conditions of the EA.

7.1. Compliance to the EMPr approval letters

7.1.1. Compliance to the Twickenham Platinum Mine: Consolidated Environmental Management Programme (“EMP”) – Final Report, (DMR reference number: LP30/5/1/2/3/2/1 (89) EM) Approval Letter.

Chapter 6.1 provides the Non-compliance and Observation findings on TPM’s compliance against the specific conditions in the Consolidated EMPr Approval Letter. A summary of the key concerns is provided below:

Observation finding

- Condition 2.28 - TPM has been placed under care and maintenance, with limited additional budget. Therefore, the skips have been fitted with lids, to prevent rain and sun from getting in contact with the waste. Due to the size of the salvage yard TPM has implemented the duty of care requirement, that doesn’t require the salvage yard of this size to be roofed. Although the construction has commenced to line section of the salvage yard, the roof hasn’t been constructed yet. Although the duty of care requirements is followed, this condition requires that the Salvage yard be roofed. Therefore, the requirement as per this EA commitment have not been fully met, and an “Observation” finding is recorded.

7.1.2. Pashaskraal and De Kamp Environmental Management Programme Approval Letter

Chapter 6.2 provides the findings on TPM’s compliance against the specific conditions in the Pashaskraal and De Kamp EMPr Approval Letter. Activities at Pashaskraal and De Kamp have not yet commenced, and no “Non-Compliance” findings were recorded.



8. Conclusion

This environmental audit report was compiled to comply with the relevant legislative requirements of both the NEMA and the MPRDA and their respective regulations thereunder. It is the main purpose of this document to report on both the compliance with the Environmental authorisations (EMPr approval letters) as applicable.

As Twickenham Mine is under care and maintenance, the conditions relating to decommissioning and closure listed in the EA that is not currently applicable to the site. As provided in this audit report, TPM demonstrates a high level of compliance against the conditions.

9. Disclaimer

This report has been produced by Shangoni Management Services (Pty) Ltd., ("Shangoni") with the skill and care ordinarily exercised by a reasonable Environmental Consultant at the time the services were performed. Further, and in particular, the Services were performed by Shangoni taking into account the limits of the scope of works required by the Client, the time scale involved and the resources, including financial and manpower resources. None of the work performed during this project shall constitute or be represented as a legal opinion of any kind or nature but shall be a representation of the findings.

No warranties or guarantees, expressed or implied, are included in or intended by the report, except that it has been prepared in accordance with the current generally accepted practices and standards consistent with the level of care and skill exercised under similar circumstances by professional consultants or firms that perform the same or similar services. Any reference to legislation in this report should not be perceived as a substitute for the provisions of such legislation. In the event of any inconsistency between this document and such legislation, the latter would prevail.

Whilst every endeavour has been made by the Shangoni to ensure that information provided is correct and relevant, this report is, of necessity, based on information that could reasonably have been sourced within the time period allocated to the assessment, and is, furthermore, of necessity, dependent on information provided by management and/or its representatives. It should, accordingly, not be assumed that all possible and applicable findings, observations and/or measures are included in this report as this report represents a sample of assessable parameters. As a subsequent event, should additional information become available, Shangoni reserves the right to amend its findings, observations, measures and executive summary.



10. Declaration of independence

Shangoni hereby declares that it is an independent auditor in that it has no business, financial, personal or other interest in this project in respect of which Shangoni is appointed. Furthermore, no circumstances exist that may compromise the objectivity of Shangoni, excluding fair remuneration for work performed in connection with this environmental audit.

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