

Response to Corruption Watch “Mining Royalties Research Report 2018”



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1. Purpose of this Response

Anglo American Platinum (AAP) and Rustenburg Platinum Mines (a subsidiary of AAP) take note of the “Mining Royalties Research Report 2018” (the CW Report) published by Corruption Watch in March 2019. This response document provides AAP’s response to references made to AAP’s mining operations, particularly Bokoni Mine (AAP’s joint-venture with Atlatsa Resources) and Twickenham Mine. The response provides AAP’s position pertaining to community engagement, transparency and accountability, mining rights, land management (particularly in terms of royalties and leases), community benefits, aspects of environmental impact management and our response to recommendations made in the Corruption Watch Report.

2. Introduction and Background

Anglo American Platinum (AAP) is guided by the purpose of our parent company, Anglo American Plc, of “re-imagining mining to improve people’s lives”. We strive to create shared value and significant benefits for all stakeholders by implementing a strategy built on a foundation of collaboration, innovation, safety, care and respect, integrity and accountability. In recent years, we have taken difficult decisions in reshaping our portfolio and have made progress improving the resilience and earnings potential of our business. We continue to invest for the future, ensuring we influence our destiny by facilitating market development for Platinum Group Metals (PGMs) and completing project studies that increase optionality, synergies and cash flow. We are also modernising our business through innovation, ensuring we have an engaged workforce and supportive stakeholders. Our differentiated value proposition incorporates long term sustainability by investing in people and our communities; the core of our business.

The Anglo American Sustainable Mining Plan, which was launched in March 2018, outlines a series of stretch goals across three major areas of sustainability – the environment, community development, and driving greater trust and transparency across the mining industry – to be delivered between now and 2030. The Sustainable Mining Plan is focused on three global sustainability pillars – Healthy Environment, Thriving Communities, and Trusted Corporate Leader – each encompassing three global stretch goals. As part of our aspiration to be a Trusted Corporate Leader we aim to transform the relationship between mines and communities, and wider society by enhancing the effectiveness of local, national and international stakeholder engagement forums.

AAP’s social strategy plays an integral role in supporting the company strategy, by ensuring that strategic priorities are delivered in a values-driven and socially responsible way. The social strategy aims to assist the business to deliver shared value i.e. by creating value to societal stakeholders, whilst generating business value. It encompasses three value levers: socio-economic development, communication and stakeholder engagement, as well as sustainable development., each aiming to deliver positive social impacts and enhance social capital.

We acknowledge that we are still in the process of refining and developing an effective stakeholder engagement framework in the context of the South African mining history: an area we have requested all stakeholders to assist us with. We believe that stakeholder engagement is a crucial element to business sustainability and overall success. Our priority is to engage continuously and effectively with all our stakeholders: host communities, communities in labour-sending areas, unions, employees, investors, the media, government, non-governmental organisations (NGOs), members of our supply chain and our joint venture (JV) partners. Our experience has shown that stakeholder engagement is most productive when it is a multi-stakeholder dialogue underpinned by joint responsibility, transparency and accountability.

On 26 March 2019 Corruption Watch launched a report entitled, “Mining Royalties Research Report 2018”. According to the CW Report, Corruption Watch initiated the research study into the effects of the mining royalties system in communities in the North West and Limpopo provinces. It was stated that

the aim of the research study was to facilitate and improve transparency and accountability in the mining royalties system. The CW Report contains some valuable insights into the dynamics between traditional authorities and mining-affected communities, socio-economic challenges experienced by communities in mining areas and community perceptions on development trusts. However, we believe that in a number of key areas, the Report contains some misrepresentations that require a response. It is unfortunate, that we were not provided with the opportunity to provide input into the CW Report before it was released.

We will be responding to the CW Report by providing in-depth responses on five broad issues, namely: Engagement, Transparency and Accountability, Mining Rights, Land Management (Royalties and Leases), Community Benefits and Environmental Impact Management. Our response will involve responding to specific issues related to our mining operations and responding to recommendations made in the CW Report. This response includes feedback from discussions held with Corruption Watch on 17 May 2019 in the Appendix section.

3. Engagement, Transparency and Accountability

3.1 Ineffective Community Engagement

The CW Report states that: *“The community engagements in the Limpopo area were marked by a deep level of tension and threatening action and behaviour among the community members. Many were frightened to go on record to speak about what they consider collusion between traditional authorities and mining companies. There was a general reluctance to take part in the research and a degree of hostility directed at researchers. Community members said they were frustrated and tired of taking part in forums and engagements with little benefit to them or little prospect of changing their current situation.”*

AAP acknowledges that the issues pertaining to community relations with the traditional authority are often complex. Communities are not homogenous entities and thus, the process of engagement is often complicated particularly when segments of the community do not recognise established societal structures. Oftentimes, representatives within the same communities tend to create conflicting forums which reflect individual interests as opposed to the broader community objectives that advance the community’s development. However, the company strives to continually improve the effectiveness of its community engagement, guided by the principles of inclusivity and fairness.

In addition, to ensure adequate consultation with communities, our channels of engagement are directly with communities through various structures that exist in communities. The engagement is not exclusively through the respective traditional authorities/councils. Other stakeholder forums, such as community engagement forums which are elected by community members in the respective villages, serve as representative forums which are engaged to ensure direct dialogue and consensus building with the broadest range of stakeholders. Some of these forums are outlined in section 3.3 below. As part of the Anglo American Sustainable Mining Plan, the focus of 2019 and 2020 will be to enhance the impact of these forums by assessing their effectiveness and jointly addressing any gaps identified with the communities themselves.

3.2 Breakdown of trust between Communities and Mining Operations

The CW Report states that: *“There appears to be a breakdown of trust between communities and the mining companies that operate on their land. It means that they keep on circling around the same issues without much changing.”*

AAP strives to build greater trust and transparency with all its stakeholders. Stakeholder inclusivity underpins our approach to trust building and is integral to securing our social licence to operate. While some progress is being achieved, demonstrated by less community unrest around our operations in 2018, we acknowledge that more needs to be done to manage and build relationships if we are to build trust and acceptance of our stakeholders. The factors that exacerbate distrust are; community

expectations for job creation, lack of municipal service delivery and infrastructure development and the expectations from mining companies to fill this gap and the perception that mining companies are not delivering economic value in the face of socio-economic challenges in the country. In reality, direct economic value disbursed directly by AAP in 2018 was R29 billion (see Table 1, below) (2017: R21 billion) through employment, paying taxes to governments and through procurement from host communities. Through the multiplier effect, the positive economic contribution of our operations extends significantly further.

Table 1: Value-added Statement for 2014 - 2018

Description Value (R millions)	2018	2017	2016	2015	2014
Taxation (total taxes)	4, 876	4, 344	3, 594	3, 545	3, 736
Salaries, wages and other benefits (Excl. PAYE and Skills development)	9,732	10, 118	13, 465	15, 539	12, 377
Skills development	104	81	112		
Dividends declared to shareholders	3,034	941	-	-	-
Minority shareholders as dividends	198	272	44		
Providers of capital	922	1, 229	1, 421	1, 390	1, 159
Total Social Investment¹	609	436	354		
Development programme²	35	-			
Environmental investment	68	89	97		
Total value distributed to society	19,578	17, 509	19, 086	20, 474	17, 272
Reinvested in the group	10,436	5, 137	5, 102	(5, 860)	5, 047
Value Distributed	29,063	20, 785	24, 186	14, 614	22, 319
Losses from investments net of interest received	(951)	(1, 861)	(2, 197)	(7, 080)	(135)
Procurement					
South Africa - Total spend	21, 060	18, 261	17, 034	20, 539	19, 682
South Africa - Local spend	3, 607	3, 403	3, 987	5, 026	4, 586
Zimbabwe - Total spend	1, 345	975	1, 264	1, 579	1, 698
Zimbabwe - Local spend	933	857	913	1, 245	1, 323
Royalties	778, 976	569, 785	546, 808	427, 556	154, 028
Alchemy dividends	28	9	-	-	-

AAP delivers shared value to society through: the payment of taxes and royalties to governments in the jurisdictions in which the company operates, the socio-economic development host communities through CSI and SLP projects, payment salaries and other benefits to employees and providing procurement opportunities to local businesses.

3.3 Engagement at Mogalakwena

Our community engagement model is built on the premise of inclusivity and our aim is to create platforms for ongoing dialogue and building trust. To build trust, at Mogalakwena Complex the following structures for engagement in place:

- **Community Engagement Forums** - Community engagement forums which are elected by their respective villages to represent them on issues around development are used to ensure direct dialogue with the broadest range of stakeholders. All our operations have community engagement forums that meet at least quarterly.
- **A Ministerial Task Team** - The Task Team was established with the former Minister of Mineral Resources (Advocate Ramathlodi). One of the main projects delivered by the Task Team is the

¹ Total social investment includes social and labour plans, corporate social investment expenditure, payments into community trusts and operations community expenses and the dividends to communities and Unki CSI.

² Development programme comprising supplier, enterprise and youth development as well as loans disbursements to suppliers and entrepreneurs.

Mapela Water Project that will see over 70,000 people of Mapela obtaining access to potable water. The project is also intended to provide employment opportunities for the youth from the area.

- **The Field Workers Program** - AAP has employed over 200 youth from host communities as field workers. These individuals are trained to engage with individual families on key site/mine-related topics, mainly through home-based visits and provide feedback directly to the operations on community concerns or requests.
- **Local publications and media** - Communities are also provided with feedback through our local publications aimed at the Mogalakwena, Amandelbult, Rustenburg and Twickenham complexes' host communities. These inform communities on local activities and news of interest to the particular community.
- **Faith-based Initiative** - AAP is amongst the first in the industry to roll out the Faith-based programme that brought over 160 leaders around Mapela to engage with churches on issues relating to the communities. This is part of the Courageous Conversation initiative led by Archbishop Thabo Makgoba. Programmes that are being implemented with the Faith Leaders include Moral Regeneration and Leadership Development in schools where over 8000 participants are involved and engage on moral issues in the society. Learners from early childhood development centres around our operations participate in this programme.
- **Complaints and Grievance Mechanism** - Each operation has a complaints and grievance mechanism which is publicised to all its community stakeholders. The system enables stakeholders to submit grievances and receive feedback from the mine after an investigation process has been undertaken. Each complaint or grievance is acknowledged, captured in a register, investigated and feedback is given to the complainant.
- **Community Perception Surveys** - AAP runs monthly Community Perception Surveys in its host communities to assess the community members' views of levels of trust, support, water, noise, biodiversity, dust, responsiveness, education, job creation, as well as health and wellbeing. The perception surveys and grievance mechanisms allow the operations to identify key issues in the community.
- **Community Relations on Mining sites** - AAP has teams employed to engage with communities on all matters. These teams make efforts to establish effective relationships with assigned communities and are tasked with having day to day interactions with villages. In addition to sharing information on mining related opportunities with various host and doorstep communities, the teams also ensure accurate recording, reporting and addressing of complaints, grievances and incidents.

3.4 Community and Traditional Council Tensions at Twickenham Mine

The CW Report highlights the following observations related to Twickenham Mine:

- *"The distrust in this community runs so deep that those who attended the Corruption Watch meeting refused to sign the attendance register. They felt that as they had attended numerous meetings before without resolution they were not prepared to sign."*
- *The traditional council here is made up of 11 members who are all men; most are pensioners and only three are literate. Those who were present are part of a faction that does not support the current traditional leader, the queen mother.*
- *There is deep distrust and division within this community with the traditional council split into two factions, trading accusations of misappropriation of funds, irregularities in lease payments from mining companies, and solicitation of bribes.*
- *The acting senior traditional leader of the Magadimane-Ntweng traditional council, Diphala Asnath Ntwampe, was implicated in a Chromex Mining Company report as asking the company to buy her a house and car. They settled on paying for the Ntwampe children's school fees.*

- *There are also on-going legal challenges and routine violent protests over the rightful successor to the head of the traditional council, despite a provincial government intervention declaring Ntwampe the recognised leader of the council."*

AAP acknowledges that the dynamics between the communities and traditional council in the area where the Twickenham Mine is located are disquieting. These concerns have been raised with the regional government. The leadership disputes within the traditional council, allegations of corruption, legal challenges and incidents of violence are disconcerting and make it extremely difficult to make real progress in the area. There are often various factions at play within communities; this impedes the progress of our projects, as communities are not homogeneous, and this adds several layers of complexity. AAP upholds the rule of law and the principles of impartiality and autonomy. While we cannot appoint representative bodies and leaders on behalf of communities, we strive to ensure that adequate consultative processes are embarked on with communities directly and with the representatives of their choice in an inclusive manner. Within the Twickenham area, we have sought to build consensus and enable development.

4. Mining Rights

4.1 Anglo American Platinum's Acquisition of Mining Rights in Limpopo

The CW Report indicates that: *"Legal challenges through the 1990s and early 2000s concluded with AAP relinquishing their previous Lebowa Minerals Trust (LMT) rights to the DMR, in exchange for security of tenure on existing mines, and a selected number of high potential deposits."*

The total full and final settlement amount in the agreement entered into with the Ditshaba Kopano Trust (DKT) to resolve this dispute, was approximately R 20 million. The payments were made in two phases, whereby the first payment was made in 2007 and the last payment was made in 2016 into the trust.

However, the assertion that AAP relinquished their previous LMT rights in exchange for security of tenure on existing mines is inaccurate. The promulgation of the MPRDA required RPM to convert its mining rights issued by the LMT (old order rights) into new order mining rights issued by the Minister of Mineral Resources, in terms of the MPRDA. This was done as part of legislative transformation and not "in exchange" for any gratuitous arrangements.

5. Land management: Royalties and Leases

5.1 General Findings on Royalty Payments

According to the CW Report: *"Some mining companies have over the years withheld payments of monies or have put these into holding accounts meant to reserve the funds until communities are able to settle their differences. Although open to abuse and legally questionable, CW understands withholding funds in instances where the supposed custodians of these funds are illegitimate and where the community is driven by division, and where there is a strong likelihood that the funds will be misappropriated. However the perpetual withholding of these funds is completely untenable and opaque."*

"This unequal distribution of benefits, and restricted access to accounts and funds has resulted in factions forming, tensions brewing, and disputes leading in some cases, to violence and death in communities."

“Furthermore, the payment of royalties and dividends through community trusts and Section 21 companies has not been effective, largely because of mismanagement and because they have been open to abuse and fraudulent practices.”

As a general observation, royalties and community development trusts seem to be used interchangeably in the Report. As a rule, mining royalties are paid to the State in terms of the Mineral and Petroleum Resources Royalty Act 28 of 2008 (as underpinned by the Mineral and Petroleum Resources Act of 2002). The only instance, where mining companies are obliged to pay royalties to communities, is where such communities hold the mining right. There are other mechanisms through which AAP adds value to communities i.e. surface lease payments entered into with the State on behalf of respective traditional authorities, community development trusts, Corporate Social Investment (CSI) and Social and Labour Plan (SLP) projects.

The Report also implies that the community development trusts and Section 21 companies are the mechanism through which royalties are currently paid to the communities. This is inaccurate. In the past, the Lebowa Minerals Trust (LMT) under the Lebowa Government, was the holder of mineral leases and the community was, and still remains, the holder of surface rights. Therefore, RPM contracted with the LMT to access minerals and the respective communities to access land or surface rights. As a result, RPM paid royalties to the LMT and lease payments to the communities. However, the payment of mining royalties by RPM to the LMT under the former Lebowa government ceased to exist when the Mineral and Petroleum Resources Act (MPRDA) of 2002 came into force. All mineral rights which were held by the then Lebowa government reverted back to the State, i.e. the Department of Mineral Resources (DMR) as the sole custodian of all mineral rights.

In the Twickenham area, land is held in trust by the state on behalf of communities. As a result, the payment of surface lease rentals (i.e. not royalties) to communities still applies today. We have met our obligations and have paid all our registered leases due to communities to date, at an amount which is estimated at R 10 million.

Table 2: Royalties paid to the State

Royalties	2014	2015	2016	2017	2018
Royalties paid to the State (R'm)	R 154, 028	R 427, 556	R 546, 808	R 569, 785	R 778, 976

In terms of royalties paid to the State, AAP has paid a total of R 2,477,153m over 5 years as shown in Table 2.

5.2 Royalty Payments to Traditional Authority related to Twickenham Mine Communities

The CW Report states the following regarding Twickenham Mine; *“The various communities’ royalty agreements with the three major mines allow for withdrawals of up to R10 000 to the trust; an annual payment of R1.2-million and a R50 000 per month payment. Ntwampe has oversight over all three payment agreements.”*

Mining royalties are paid to the State in terms of the Mineral and Petroleum Resources Royalty Act 28 of 2008 (refer to section 5.1, General Findings on Royalty Payments, above). Thus, the claim that the acting Senior Traditional leader of the Magadimane-Ntweng traditional council, Diphala Asnath Ntwampe, benefits from royalty payments paid by Twickenham Mine, is inaccurate. The payments that are currently made to Magadimane-Ntweng Traditional Authority are in respect of the surface lease agreements entered into between AAP and the community, over the farms Waterkop 113 KT, Mecklenburg 112 KT and Surbiton 115 KT, which are held in trust by the State on behalf of Magadimane-Ntweng Traditional Authority.

6. Community Benefits

6.1 Establishment of Community Trusts and Section 21 Companies

The CW Report notes that: *“The communities here (i.e. Limpopo) have established community trusts and Section 21 companies, through which their royalty pay-outs are supposed to be made and can be managed by community consensus. They complain that these are poorly structured and that benefits do not filter down to them. There is centralised governance of the trusts and this, the community says, means that some communities simply fall through the administrative cracks.”*

As a point of clarification, Section 21 companies were established in the past in order to enable communities to enter into legal contracts pertaining to surface leases (i.e. not royalties) with AAP as representative structures for the respective villages. However, it is our understanding these Section 21 companies are no longer in existence and have been replaced by development trusts. AAP acknowledges that some community trusts are not having the developmental impacts intended. We have taken steps to assist communities to improve governance of these structures through legal mechanisms such as insistence on adequate representation and the use of democratic processes to appoint trustees, where trustees are elected by communities.

AAP agrees that some community structures are governed ineffectively and not trusted within the communities. In the spirit of inclusivity and solution finding, AAP has invited communities, civil organisations and schools of excellence to recommend community benefit structures that are effective and accepted by all.

6.2 Socio-Economic Development and Social and Labour Plans

According to the CW Report: *“SLPs are poorly implemented and communities complained that there were few procurement opportunities for local entrepreneurs, biased recruitment and little being done to build up a local skills base.”*

AAP recognises the socio-economic challenges faced by our communities, particularly in the Limpopo province which is characterised by generally low literacy and skills levels, high rates of unemployment and high levels of poverty. We continue to be committed to the principle of shared benefits and value creation for all our stakeholders. In 2018, the total social investment spend was R609 million, which included corporate social investment (CSI) spend in South Africa, of R254.21 million (2017: R295 million) in excess of the stipulated 1% of NOPAT, and in Zimbabwe of R9.95 million (2017: R5.7 million). AAP facilitated the establishment of community trusts which collectively have R 82 million in funds, for the previously relocated communities of Ga-Pila, Ga-Puka and Ga-Sekhaolelo near Mogalakwena. The trusts are run by the communities to effect community development.

Table 3: Community development programmes undertaken between 2014 – 2018

Community development programmes	2018	2017	2016	2015	2014
Health	8	(15)	12	99	11
Mogalakwena Trucking of Water & Hallcore	59	55	36		
Education and skills development	56	46	35	54	25
Infrastructure	67	85	136	169	62
Enterprise development	41	12	30	65	10
Community trusts	82				
Community dividends	142	108			
Other (Alchemy, Chairman's Fund, interfaith programme and other donations)	145	137	57	63	128
Unki CSI	10	6			

The process of identification of Social and Labour Plan (SLP) projects is an inclusive one requiring engagement with relevant municipalities, community structures and the DMR. Since 2010, we have initiated 114 projects related to our SLPs. By the end of 2018, we had completed 111, most of which have been handed over to the relevant beneficiaries. A key feature of our SLPs is a commitment to infrastructure development and job creation, a critical need in our host communities. We aim to ensure our operations' infrastructure projects complement the integrated development plans (IDPs) and priorities of local municipalities. In Mogalakwena, our focus on infrastructure development and job creation is further validated by the assessment of the needs analysis and public participation sessions conducted in the Mogalakwena IDP 2018/2019 which highlights "top needs"³ which include;

- Lack of community facilities in settlements, i.e. Community Halls, Libraries, and Sports Facilities
- Need for additional classroom blocks
- Shortage of decent sanitation facilities
- Lack of high mast lights
- Need for low cost houses
- Lack of dumping sites/refuse removal
- Need for skills development training

While a number of the needs identified pertain to Municipal deliverables, the SLP projects identified by communities, municipalities and the DMR aim to address broader community development needs contained in the IDP. Summaries of the 2010 and 2016 SLPs are presented in Figures 1 and 2 respectively.

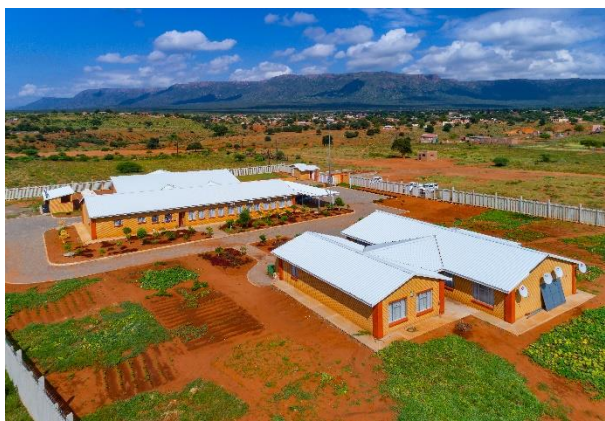
Progress summary of 2010 SLP		
Number of projects	114	
Projects completed	113	
Ongoing projects	1	
Overall SLP Commitment	ZAR 679.5m	
Spend to date	ZAR 1 400m	
No. of jobs created	2353	Maseven Clinic

Figure 1: Summary of SLP 1 projects

³ <http://www.mogalakwena.gov.za/mogalakwena-admin/pages/sites/mogalakwena/documents/idp/2018-2019%20Final%20IDP1.pdf>


Progress summary of 2016 SLP		
Number of projects	74	
Projects completed	35	
Ongoing projects	31	
Projects not started	9	
Overall SLP Commitment	ZAR 365 m	
2018 Spend to date	ZAR 226 m	
No. of jobs created	410	Ditwebeleng Solar Street Lights

Figure 2: Summary of SLP 2 projects

Anglo American has developed an inclusive group procurement strategy that will assist all South African operations to achieve their empowerment and transformation goals. Our inclusive procurement approach aims at integrating and increasing spend among our host-community suppliers, targeting black-owned exempted micro-enterprises (EMEs) and qualifying small enterprises (QSEs). We aim to make our procurement more inclusive, diversified and transparent for our host communities. In addition, in 2018, Anglo American Zimele, an Enterprise and Supplier Development vehicle provided funding to 55 enterprises to the value of R44,723,427 and created 866 jobs (500 new and 366 jobs sustained).

We are committed to contributing to local skills development through our programs such as Institutional capacity building. We focus on facilitating productive employment, strengthening skills, competencies and the abilities of our employees and community members to promote robust, self-sufficient local economies long after the life-of-mine. While there is great need for skills development in South Africa, in 2018 we achieved the following milestones:

- We invested R4 million (2016: R9 million) in institutional capacity development.
- We engaged the Development Bank of South Africa to develop and deliver leadership and governance training for 540 members of traditional councils on 29 sites where we operate, investing R20 million.
- We continue to support the work of the Premier's Employment and Growth Advisory Council (PEGAC) in Limpopo in conjunction with our partners, through detailed needs analysis and, where necessary, resource support. For instance, at the Greater Tubatse Municipality, based on the needs identified, there are three resources available to support the municipality: an engineer, a financial resource and an administrator.

Table 4: Procurement spend on host and local communities

Procurement spend	2014	2015	2016	2017	2018
Host communities* (Door Step) (R millions)	-	144	421	1 183	1 642
Local communities** (Zone of Influence) (R millions)	3 049	4 126	3 976	3 388	3 600

*Host communities are communities that are door step suppliers that have direct contracts with AAP.

**Local communities are located within a zone of influence around AAP operations.

There has been a relatively new source of conflict among communities, namely Business Forums. There has been verbal dissatisfaction and discontent regarding supply chain opportunities from the Twickenham Local Business Forum.

AAP remains committed to socio-economic development of our host communities. Even during years of trying economic conditions, AAP paid its SLP and CSI commitments, which extended well beyond legislative requirements. Procurement continues to be a key focus area, in delivering shared value to host communities.

6.3 Engagement on SLPs regarding Twickenham Mine communities

The CW Report asserts the following related to Twickenham Mine; *"They say the mines do not consult or communicate with them and they believe they are flouting their SLP and other environmental regulations."*

At Twickenham Mine, one of the primary structures for inclusive engagement is the Community Engagement Forum (CEF). The CEF, which includes elected representatives from all the host communities, appointed representatives of nine (9) Traditional Authorities as well as Ward Councillors under the jurisdiction of the Fetakgomo Tubatse Local Municipality. The CEF structure has been endorsed by the DMR, Local Municipality and Traditional Authorities. The CEF represents all key community stakeholders within the host communities. There are many factions at play within communities with different claims to be legitimised. The Magobadeng Resettled community is divided and currently comprises of two factions. Both factions are currently attempting to converse with each other.

Twickenham has a total of 32 projects as part of the SLP1 and 2 which are being implemented from 2011 to 2021. To date, 18 of the projects have been completed and handed over to communities. Flagship projects include the electrification of 990 households in Ga-Mampa and Phasha Makgalanoto villages which was completed at the end of April 2019. There have been delays in the completion of the household electrification at Mampa and Phasha Makgalanoto communities, which was caused by impropriety and corruption by two contactors. Both contactors were dismissed and the project was held up, while a new contactor was appointed.

6.4 Access to the Community Trust Account related to Bokoni Platinum Mine

The Report states the following excerpts concerning the Bokoni Platinum Mine Communities:

- *"The community welcomed engagement and the opportunity to address the issues that the community trust faces.*
- *A trust was established to undertake, fund and maintain community development activities for the benefit of the communities. However, the trust deed has not been made available to the community, making it difficult to confirm details of the provisions of the trust.*
- *Community members claim that their community trust account is worth R 24-million in contributions from Bokoni Platinum Mine and is controlled by traditional leaders who, they say, fight among themselves. Corruption Watch requested that financial statements and other information relating to deals signed by the traditional leaders be made available but the traditional leaders have not been forthcoming."*

Initially, when the leases were concluded between RPM and communities, RPM facilitated the establishment of a community trust by the name of Dishaba Kopano (IT 4362/2005) (Dishaba Kopano Trust) in terms of clause 15.1 of the lease agreement for the benefit of various communities. The

Dishaba Kopano Trust was registered with the Master of the High Court in Polokwane. An amount of R20 million was donated by RPM and paid to the trustees of the Dishaba Kopano Trust solely for community development and community-based projects. In 2006 RPM, in terms of clause 15.1 of the lease agreements (which are similar for all the affected communities) donated a further R20 million for the benefit of eight communities. After consultation between RPM, the Department of Rural Development and Land Reform (DRDLR) and the affected communities, a resolution was taken not to deposit the donation monies into the Dishaba Kopano Trust, but into Norton Rose Fulbright Attorney's trust account, our legal representative. The Dishaba Kopano Trust included communities which resided next to Bokoni Mine, which has a Joint Venture agreement with RPM. The Twickenham communities did not want their donation monies to be mixed with the Trust and instead opted for the donation of monies to be paid into their Traditional Trust accounts or other bank accounts notified in writing by the communities to RPM. The monies which were committed for the DKT Trust (R20 million) have been paid in full to the affected traditional authorities. Records of proof of payments are available upon request.

6.5 Lack of Development for Bokoni Mine Communities

The Report makes the following assertion regarding Community Development in Bokoni Platinum Mine Communities: *"It is clear that little development has taken place in this community. The roads are in a bad condition, there are challenges in accessing drinking water, there is lack of skills development and little food production. It raises questions about where and how the monies from royalties have been spent."*

The socio-economic development challenges within the communities around Bokoni mine are visible and have been raised with the local government who are responsible and accountable in ensuring that there are adequate levels of service delivery. However, Bokoni mine has undertaken several projects to enhance development in local communities around Bokoni Mine even while the Mine is in Care and Maintenance. Some key initiatives are outlined below in Table 2:

Table 5: Socio-Economic Development Initiatives at Bokoni Platinum Mine

Project / Initiative	Description	Value	Impacts / Beneficiaries
Improved road infrastructure (Access Roads development)	Bokoni has undertaken the compacting and re-gravelling of local access roads at Monametsi, Selepe, Maruping and Manotoane villages.	R3,9m	Monametsi, Selepe, Mokgotho, Maruping and Manotoane villages
Improved education infrastructure (Mokgotho and Shole Creches)	The construction of two Early Childhood Development (ECD) centres, have been completed at Shole and Mokgotho villages. An administration Block has been constructed at Mahudu Primary School.	R 2,2 m	160 ECD learners from Mokgotho and 120 ECD Learners from Shole community. 8 educators employed in both. 50 locals employed during construction
Mahudu Primary school	Construction of an administration block	R2,15m	200 Learners benefitting from the school 8 Educators benefitting 30 locals employed during construction 2 Local contractors supported

Project / Initiative	Description	Value	Impacts / Beneficiaries
Komanchas Small-scale slate crusher	AAP has established a small-scale slate crusher operation to produce stone tiles. This Non-profit Organisation (NPO) is in production.	R 3,7m	600 jobs created
Mosotsi bridge	Construction of community low level access bridge at Mosotsi village	R5,7m	In excess of 1,000 community members from Mosotsi to Motsatsana benefit. 40 local labours employed during construction
Monametsi Skills Development	Socio economic development is being enhanced through the creation of skills development infrastructure. This initiative will support Small, Medium and Micro-enterprises (SMME's) with training and upskilling. This will also include a fence manufacturing project.	R200,000	Monametsi Community
Mosotsi Organic vegetable farm	An organic vegetable farm has been set up at Mosotsi village. R 0.5 million was spent on erecting fencing, an irrigation system and on farming equipment.	R500,000	Mosotsi Community
Sefateng Bulk Water Project	AAP is in the process of completing a reservoir to support borehole infrastructure in the local communities of Sefateng, Bogalatladi, Makgolaneng and Machakaneng. We are working in collaboration with the municipality to build a pipeline and a concrete reservoir. Refurbishment of borehole water infrastructure in the villages is in progress.	R3,6m	Boreholes installed are benefitting villages at Sefateng, Bogalatladi, Makgolaneng and, Machakaneng.
Chicken Crop Farming	Two chicken broiler projects have been undertaken, one project at Mosotsi village for egg layers and another chicken project which is currently in development. Chicken crop farming for the broiler chicken production, is being developed at Seekoiee Farm.	R9,2m	Manotoane Community, Selepe Community and Nkoana Community

6.6 Housing concerns of Bokoni Mine Community

The Report asserts: *"The Monametsi community agreed to relocate to allow for the expansion of the Bokoni Platinum Mine in exchange for compensation and alternative housing. They say their new houses began to crack almost immediately from when they took occupation. Their case has been taken up by Richard Spoor Attorneys."*

Following the concerns raised by the Monametsi community regarding their houses, AAP has embarked on a programme to refurbish all affected houses, which started in January 2018. The project is currently ongoing, however has been interrupted by community disruptions. 44 houses are affected - 20 of these

houses are being refurbished and 24 undergoing complete reconstruction. At this stage, 4 houses are being finalised. After completion of houses, a completion certificate is issued with a snag list which details final rectifications.

6.7 Governance of Community Development Trusts

The Report states: *“There is widespread lack of accountability and effective community consultation. There are accusations from the communities of fraud, corruption and misappropriation of funds and community assets by the leaders of traditional authorities and trustees.”*

AAP has supported communities in organising themselves for development. The following juristic structures have been facilitated depending on the preference of the community; community development trusts, household cash donations, For-Profit companies, Non-profit companies, or Cooperatives.

In our experience, the benefit of development trusts lies in the transfer of ownership and control of the trust assets from the donor to one or more trustees who hold the trust assets not in their personal capacities, but for the benefit of the communities which are the intended beneficiaries. Another advantage is that development trusts allow sound governance practices to be implemented. Furthermore, where applicable, the receipts and accruals of any Traditional Community (or Traditional Council) established or recognised or deemed to have been established or recognised in terms of the Traditional Leadership and Governance Framework Act, 2003 are exempt from normal tax.

In addition, AAP has taken steps to improve governance structures during trust establishment, ensuring increased direct community representation and greater transparency. Community trusts that AAP has helped to establish, have included AAP-nominated trustees and independent trustees together with auditing firms to safeguard communities against the risks of corruption or mismanagement.

The Alchemy Trusts

Alchemy is a R3.5 billion (2.3% ordinary shares of AAP) initiative designed to promote the economic participation of “historically disadvantaged South Africans (HDSA)” in communities neighbouring four AAP operations and to contribute towards development in Labour Sending Areas. The transaction was publicly announced in the last quarter of 2011. Through the Development Trusts, Alchemy seeks to unlock resources flowing from AAP share ownership and to use these to facilitate and sustain development. In the Eastern Limb, around AAP’s Twickenham mine, the Bohwa Bja Rena Community Development Trust was established in 2015 to benefit communities residing 15km around the mine. Prior to the Community Development Trust (CDT) establishment, a series of engagements were held with community representatives to co-design the respective Trust Deeds. This locally based committee was called the Working Group (WG). The WG played a pivotal role in assisting to understand the community dynamics, challenges and opportunities and provide input that helped shape the Trust Deed. The Working Group was dissolved once the CDTs were established. Five Trustees constitute the management of the CDT in the Foundation phase, three Independent and two Founder Trustees.

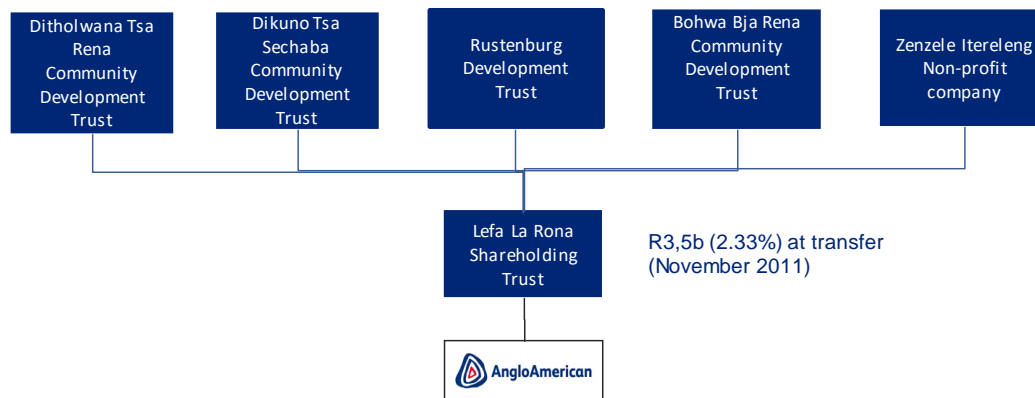


Figure 3: Alchemy Trusts Structure

The Trusts have three funding streams, dividend, Corporate Social Investment together with Safety KPI. To date, Bohwa Bja Rena has spent approximately R6 million on development projects and 81% of the total Trust funds have been allocated to Education, Digitalization enablement, Healthcare, Agriculture, Capacity building programs and infrastructure initiatives. Projects that have been completed include; school water and sports program, capacity building of community healthcare workers and family strengthening programs. Projects in progress include: a community wide Wi-Fi development enablement platform, school administration block construction, early childhood development capacity building, amongst others. The Trust is currently planning for the community trustee selection process to elect community representatives who will form part of the Trust management structure.

7. Environmental Impact Management

7.1 Mining impacts on communities

The CW Report states: *“Some community members also raised their concerns about blasting on the mines taking place without proper notice. It is potentially life-threatening and has left damage to their homes, yet they have no recourse to claim or complain. They also say they have to deal with pollution of water sources and air pollution that has led to the death of livestock and loss of grazing and arable land.”*

Blasting

The Mogalakwena Complex has in the past received complaints over damage to houses owing to blasting activities, through its Social Issues and Grievance Management System. The system enables stakeholders to submit grievances and receive feedback from the mine after an investigation process has been undertaken. Those complaints were individually investigated by Mogalakwena Complex personnel and independent consultants. The investigations revealed that the damage to the properties were attributable to several factors including inadequate foundations, poor structural design, substandard construction standards and techniques, and natural aging. Mogalakwena Complex has, notwithstanding limited direct impact of blasting on housing, employed a drill and blast specialist to design blasts to improve on the minimising of potential impacts.

For the Skimming and Leruleng villages located around the Mogalakwena Complex, there is a joint agreement with the community, that blasting notifications will be sent to the community leaders and the School Management Committee, before blasting takes place. There is also an agreement that the school will be evacuated during blasting times. There are agreed upon times during which blasting occurs.

At Twickenham, there is no visible blasting as all blasting was undertaken underground. A sound buffer wall was built at Hackeney shaft to mitigate the shaft vent noise and the conveyor belt noise. This wall was constructed by Small, Medium and Micro Enterprises (SMME's) from the affected communities.

Water pollution

There is an extensive network of surface and groundwater monitoring points across the Twickenham Platinum Mine (TPM) and Bokoni Platinum Mine (BPM) lease areas, to develop a clear understanding of the risks to this resource. Water quality targets are outlined in the mine's Water Use License by the Department of Water and Sanitation (DWS). Monthly and quarterly water samples are taken and sent for analysis by an accredited laboratory as per the requirements of these operations' Water Use Licenses. All water monitoring results are compiled into reports by an independent consultant, which are submitted to DWS on a quarterly basis for the BPM results and on a monthly basis for the TPM results as per the requirements of these operations' Water Use Licenses. Although exceedances of the water quality targets occurs from time to time, it is reported to DWS and the operations assess the results on a continuous basis to ensure causes of pollution are identified and addressed.

In order to improve the mine's understanding of the regional water quality, TPM has completed an extensive groundwater study in and around its doorstep communities to understand the availability of water and various potential pollution sources, which will be shared with the DWS and the Department of Mineral Resources (DMR). BPM conducts quarterly groundwater monitoring which serves as an indicator on how the operation might impact on groundwater quality.

Both operations are acutely aware of the problems that communities face in obtaining clean potable water and recognises its responsibility to help wherever possible. Both operations are working in close collaboration with the local municipalities, to evaluate ways of improving this situation. Both operations have complaints registers and any complaints regarding potential or actual water pollution thought to be due to mining activities, are investigated and reported on.

The Limpopo Province is known to be a water scarce region, currently experiencing water challenges which have led to major constraints on the ability of Government, and in turn that of the Municipality, to provide water for businesses such as mines and communities. AAP together with the Mapela Task Team as a community stakeholder identified an opportunity for the company to support the community in the provision of water and this has subsequently been endorsed by the Mogalakwena Municipality.

AAP is funding a long-term solution to provide water to over 70,000 people living in 42 villages around Mogalakwena Complex. The contractor, Hall Core Water Mapela, is responsible for increasing water-supply capacity by drilling, equipping and maintaining boreholes for 10 years, while AAP is funding potable water supplied. The project, which was successfully piloted at Skimming village in July 2018, is being rolled out across the villages and will deliver a total of 3.5Mℓ per day. At least 88 people will be permanently employed for the next 10 years.

AAP has been instrumental in setting up partnerships to advance bulk-water resource development in Limpopo:

- Lebalale Water Users Association (LWUA) was established in 2002 to develop and operate the supply system from Hovercroft to Steelpoort Valley, providing raw water to 15 mining operations. AAP is the majority shareholder and chairperson of the entity. LWUA was appointed to project manage raising the Flag Boshielo dam wall with DWS and is engaging with the department on potentially assisting with the Olifants River Water Resource Development Project (ORWRDP).
- Olifants River Water Resource Development Project: The mining industry's engagement with DWS on this project is coordinated through the joint water forum. AAP chairs the forum's executive committee and has been instrumental in engaging with the department on bulk-water distribution in Limpopo.
- Premier Employment Growth Advisory Council (PEGAC): Established in the early 2000s, PEGAC is a forum for public and private sectors to coordinate efforts to develop infrastructure in Limpopo primarily aimed at water infrastructure for local communities. AAP co-chairs the

integrated infrastructure working group and has seconded a specialist to assist the premier's office with project management and coordination since 2017.

Air Quality

Our environmental monitoring programmes at our Mines have recently been augmented by continuous, real-time monitoring apparatus surrounding the mine pits through which dust, noise, blast gasses and vibrations are monitored. Dust fallout data has been monitored at Mogalakwena Complex since inception and the Mine currently monitors 18 dust buckets surrounding the mine and 14 within the perimeter of the mine. The dust buckets are serviced by an independent consultant and analysed by a SANAS accredited laboratory. According to our records, there have been no dust exceedances against the National Dust Control regulations for residential and non-residential limits, since 2011.

Monthly dust fallout monitoring has been taking place at TPM since inception by an independent and accredited laboratory. Monitoring is conducted at fifteen monitoring locations in and around the operational area, of which eight locations are placed at sensitive receptors. These eight locations are not directly affected by operational activities. TPM has been engaging with the local communities on water and air quality monitoring since 2017, where a formal joint monitoring programme has been established with one of the Community Engagement Forum representatives included as a member, which takes place on a quarterly basis.

Monthly dust fallout monitoring has been taking place at BPM since inception by an independent and accredited laboratory. Approximately thirty points are sampled, dependent on whether vandalism has taken place. There have been several complaints regarding dust emanating from the operation's tailings facilities, which is currently being addressed with the upgrade of the existing dust suppression systems with the aim of eliminating dust exceedances from these structures.

7.2 Mining related impacts at Twickenham Mine

According to the Report, *"The community have concerns of mines operating too closely to their homes, causing damage and disruptions to their daily lives. There is air and noise pollution."*

A joint structure has been established with AAP, the Bench Marks Foundation, the Department of Water Affairs and Sanitation, the provincial Department of Agriculture, Sekhukhune Environmental Justice Network, Sekhukhune District Municipality and the Cattle Farmers Association to jointly assess and test the quality of water and to provide solutions to water-related issues. One of the resolutions taken was to train cattle farmers on livestock management, who have been trained at the Mogalakwena Incubator.

Twickenham mine has been placed under care and maintenance and is therefore not operational, therefore air quality and noise related impacts are limited.

8. Recommendations from Corruption Watch Report

On the basis of the findings described in the Report, a summary of Corruption Watch's recommendations includes the following:

- *"Develop and adopt a mining royalties best practice guide.*
- *Implement a monitoring and reporting system with penalties for transgressors.*
- *Train and support communities to engage from a stronger position.*
- *Collaborate and network better with civil society and NGOs to build capacity, raise awareness and educate communities.*
- *Build long-term relationships between all stakeholders to rebuild trust.*
- *Develop new communication and consultation strategies that ensure that people's voices are heard, processes are transparent, and dispute resolution mechanisms are in place.*
- *Develop mechanisms to compel traditional councils, community trusts and mining houses to present complete audited documents on a regular basis.*

- *Learn from mistakes and success stories – adapt for locally appropriate solutions.*
- *Change the governance and composition of traditional councils.*
- *Develop mechanisms to ensure easier public and researcher's access to scrutinise financial documents and other relevant information.*
- *Develop mechanisms to curb political interference.”*

While we note and acknowledge the intent of the recommendations related to mining royalties, we wish to reiterate that royalties are paid to the State directly and not to communities nor Traditional Authorities. AAP supports the principle of greater transparency with respect to the royalty payments, governance of community trusts and financial reporting of traditional councils. We would support a lobby to have a portion of royalties currently paid to the State, to be ring-fenced for local communities and managed through appropriate structures.

We remain committed to transparent financial disclosure in accordance with reporting frameworks such as the International Framework of the International Integrated Reporting Council, the South African Companies Act 71 2008 (Companies Act), JSE Listings Requirements and King Report on Corporate Governance for South Africa (King IV). In addition, development trusts are independently audited. AAP discloses in its Annual Supplementary Report, payments regarding SLP, CSI, leases and royalties. AAP's 2018 Supplementary Report can be accessed at:

<https://www.angloamericanplatinum.com/~media/Files/A/Anglo-American-Platinum/documents/annual-updates-2019/amplats-supplementary-report-8-march-1400.pdf>

9. Conclusion and Way Forward

Anglo American Platinum welcomes engagement with all stakeholders; private citizens, communities, non-governmental organisations, government and civil society organisations its economic, social and environmental performance. The Corruption Watch Report contains some valuable insights into the dynamics between traditional authorities and mining-affected communities, socio-economic challenges experienced by communities in mining areas and community perceptions on development trusts. However, it is clear that some of the conclusions reached in the Report are based on misinterpreted or incomplete information particularly on the payment of royalties through community development trusts and Section 21 companies. The Report paints a grim picture of socio-economic development challenges, tensions between communities and traditional authorities and conflict and distrust between mining companies and communities in the North West and Limpopo.

AAP recognises the socio-economic challenges faced by our communities, particularly in the Limpopo province which is characterised by generally low literacy and skills levels, high rates of unemployment and high levels of poverty. We continue to be committed to ensuring shared benefits and value creation for all our stakeholders, through socio-economic development initiatives, including delivery of SLP projects. We continue to make progress in demonstrating the impacts of our value disbursement realised through employment, paying taxes to governments and procuring from host communities. In addition, AAP has made great progress with regards to its community engagement initiatives, community spend, health and safety performance and environmental management. This has been achieved despite the difficult financial conditions in which the company has operated in recent years.(Refer to Figure 4 for AAP's value-creation to society.)

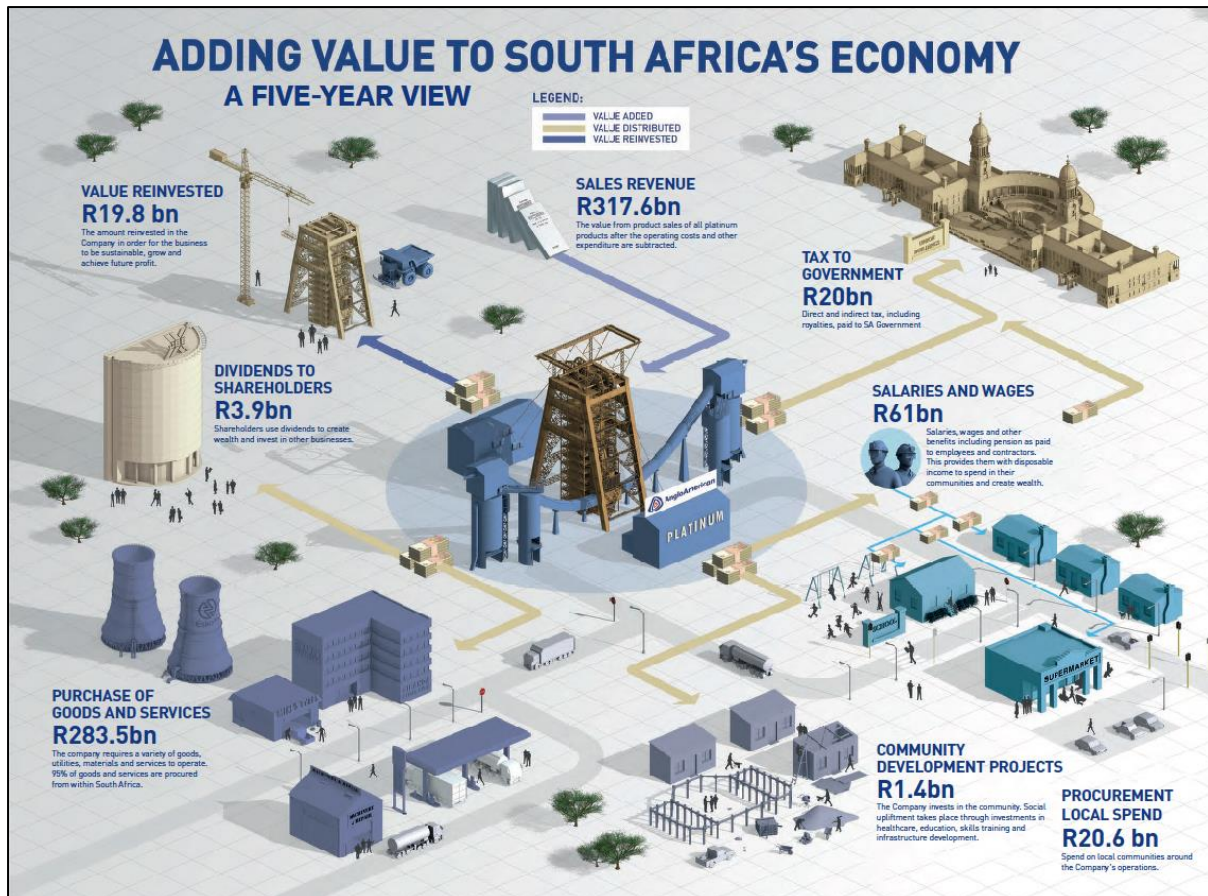


Figure 4: Anglo American Platinum's value add to society

While AAP is proud of its sustainability performance over the years, we are committed to continuous improvement in line with our vision of “re-imagining mining to improve people's lives”. In order to achieve our goal to be regarded as a trusted corporate leader and to transform the relationship between our mines and wider society, we will continue engaging with Corruption Watch beyond the issuing of this response.

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Appendix 1 – Feedback from Corruption Watch Engagement

Minutes

Subject Meeting with Corruption Watch

Date 17/05/2019

Time 15h30 - 16h30

Location: **Corruption Watch Offices**

Present **Anglo American Platinum:**

Thabani Mlilo
Tebogo Makhubedu
Lindo Khuzwayo
Adithi Rooplall

Anglo American plc:

Hermien Botes

Corruption Watch:

Deborah Muthemwa-Tumbo
Zanele Mwale
Tara Davies

Apologies Mashudu Masutha (Corruption Watch)

1. Introduction and Background

On 26 March 2019 Corruption Watch launched a report entitled, "Mining Royalties Research Report 2018" (the CW Report). According to the CW Report, Corruption Watch initiated the research study into the effects of the mining royalties system in communities in the North West and Limpopo provinces. It was stated that the aim of the research study was to facilitate and improve transparency and accountability in the mining royalties system. The CW Report contains some valuable insights into the dynamics between traditional authorities and mining-affected communities, socio-economic challenges experienced by communities in mining areas and community perceptions on development trusts. However we believe that in a number of key areas, the Report contains some misrepresentations that require a response.

AAP and Anglo American plc requested a meeting with Corruption Watch to engage on the details of the Report and to strengthen the relationship with Corruption Watch. The meeting was held at Corruption Watch's offices, located in Braamfontein on 17 May 2019.

2. Proposed Course of Action

It was agreed that AAP would provide their official response to the Corruption Watch Report and a follow-up discussion could be thereafter scheduled.

3. General

- Corruption Watch provided the background and the genesis of the “Mining Royalties Research Report 2018”. The research on which the Corruption Watch Report was based, was initiated by a complaint received on the payment of royalties by mining companies. The research was funded by a civil society organisation, Open Society Foundation.
- The research comprised mainly of engagement with communities on key themes including royalty payments, traditional authorities, community development trusts and took approximately 2 years.
- Corruption Watch has a hotline and website through which queries can be lodged. These queries are routed to Corruption Watch’s Stakeholder and Campaign Unit.
- Since Corruption Watch’s inception, approximately 25 000 community complaints have been received. A Community Engagement Plan was devised and followed to facilitate engagement with communities during the research phase. Community leaders and traditional leaders were involved during the engagement process. Throughout this process, the often-less heard members of the community were provided with the opportunity to voice their opinions. During the first community engagement, 120 written submissions were received from community members. The written reports were submitted, even when community members did not speak about their concerns.
- A number of mining companies, the Department of Mineral Resources, Ministers and their special advisors were engaged consulted in the compilation of the report. However, AAP was not engaged as part of the information gathering process.
- AAP indicated that since the Report had some information that was inaccurate, providing AAP the opportunity to comment and provide input prior to publication would have addressed and clarified some of the points, in particular the mechanisms for payment of royalties. However, the official response deals with those points of clarification.
- Since the publication of the Corruption Watch Report, Government has acknowledged the importance of the work in highlighting the issues contained in the report.
- Corruption Watch has been providing feedback to the communities on the impact of the report and the engagements following its publication via radio.
- AAP expressed frustration at the lack of recognition by some quarters of civil society of the progressive and beneficial work/initiatives and contribution to SLPs and community development. In response, Corruption Watch acknowledged that government and traditional leaders also need to play their part instead of looking to mining companies to providing solutions.
- Corruption Watch indicated their intention of developing a Best Practise Guideline on payment of Royalties for mining companies.
- AAP indicated that such engagements were important, as it provided an opportunity to address concerns that have been raised in the report.
- An invitation was extended by AAP to Corruption Watch to participate in the company’s annual Materiality process, to which Corruption Watch agreed.

4. Next Meeting

The date for the next meeting will be determined after Corruption Watch receives the official response from AAP.

5. Conclusion

Both parties expressed their appreciation for having convened and were open to holding further discussions.



Signed as a correct record of the proceedings.


.....
Mr. Thabani Mlilo
Head of Sustainability
Corporate Affairs
Anglo American Platinum

Appendix 2 - Example of Community Engagement at Mogalakwena

MOGALAKWENA COMPLEX

BIGGER AND BETTER!



To reach its full potential, Mogalakwena Complex is looking to expand.

With a phenomenal resource to mine and the best people to mine and process it, the Mogalakwena Complex team is considering what would be the best way to expand. The expansion plan is aligned with the operation's existing mining license and will be developed on the existing surface lease area.

If the proposed expansion project is approved, it will create around 1,500 jobs during construction. Local community members will be first in line for temporary jobs during this phase. There will also be opportunities for local businesses to participate in construction.

"We still need to do a lot of public consultation and gain several government and legislative approvals to complete the project's environmental approvals, but we are pleased with the quality of the engagements we have had thus far and with the inputs on the proposed expansion that we have received from our stakeholders," says Anglo American Platinum principal project manager Jaco Pieters.

These engagements included several meetings at the 5-in-1 Sport Complex, which interested and affected parties were invited to attend as part of the environmental authorisation process. They were able to engage with people from Mogalakwena Complex, project teams, and SRK Consulting at the meetings. About 650 people attended the meetings over the five-day consultation period, taking advantage of the opportunity to raise questions and concerns.

Pieters added: "The project is also still subject to internal review processes. We have completed the pre-feasibility A study and the independent investment assurance review is being concluded. The pre-feasibility B study comes next, and then the feasibility study. These should be finished by early 2021. Only after the feasibility study has been approved can construction start."

READY TO GROW... Eager to help unlock Mogalakwena Complex's full potential are, back from left: SRK Consulting intern Munangwa Mamathoni; SRK Consulting principal environmental scientist Franciska Lake; SRK senior social scientist Adel Malebana; SRK Consulting environmental scientist Kavilan Naidoo and hub administrator Kholofelo Madiba. Front, from left: Mogalakwena Complex community relations officer Musa Mitileni; consultant Deon Luyanda Ntlanjeni; SRK Consulting director Vassie Maharaj; stakeholder engagement manager Peter Lentswane; SRK Consulting intern Karabo Maruapula; SRK Consulting environmental scientist Aphwe-Zona Dotwana; service provider Vivian Langa; SRK Consulting intern Onalena Tjale; and service provider Irene Nyamane.

THE PROPOSED EXPANSION PROJECT INCLUDES THE FOLLOWING:

- Constructing a third concentrator;
- Upgrading the South Concentrator;
- Expanding Blinkwater Tailings Storage Facility Compartment 2;
- Constructing a buffer water storage dam;
- Developing a new waste rock dump; and
- Expanding the existing mine fleet workshops and associated infrastructure.



LISTENING ATTENTIVELY... About 650 people attended the engagement meetings, which were held over five days.