



PGM INDUSTRY RESPONSIBLE MINING AUDIT STATUS

January 2024

Since 2023, the IPA is collecting yearly updates on the status of different auditing and verification schemes of its mining member companies in the context of responsible mining, including but not limited to IRMA – the Initiative for Responsible Mining Assurance, one of the most comprehensive auditing schemes for mining companies.

Responsible mining is commonly defined as mining that involves and respects all stakeholders, minimizes, and takes account of its environmental impact, and prioritizes a fair division of economic and financial benefits.

The purpose of the industry approach is to:

- increase investor and other stakeholders' confidence in the PGM supply chain,
- demonstrate and assess continuous improvement of sustainability and business performance,
- establish and ensure an effective risk management,
- ensure regulatory compliance,
- share proof points and best practices on members' corporate responsibility actions.

Within the Sustainability Committee, IPA members are gathering in an IRMA Working Group to engage with the Initiative, explore synergies and collaboration regarding common challenges, and to enhance impact, efficiency, and business benefit around responsible mining and sustainability.



1. Anglo American Platinum (<https://www.angloamerican.com>)

Anglo is finalising the public release of site reports in South Africa (Amandelbult and Mototolo) and Zimbabwe (Unki surveillance audit). The Mogalakwena audit report release has not been determined yet. Surveillance audits are conducted 12 to 18 months after initial audit or recertification audit report release. Recertification audits take place three years after initial audit report release.

The company has now completed stage 2 audits at all of its own managed operations and the schedule is as per below.

IRMA audit and report timelines

Site – Stage 2 Audit Complete	Report release	Surveillance Audit	Recertification Audit
Amandelbult, South Africa	March 2024	March- Sep 2025	Around February 2027
Mototolo, South Africa	March 2024	March- Sep 2025	Around February 2027
Unki Surveillance, Zimbabwe	February 2024	February - Aug 2025	Around January 2027
Mogalakwena Mine, South Africa	TBC	Depends on report release	Depends on report release

2. Sibanye-Stillwater (<https://www.sibanyestillwater.com>)

- Sibanye-Stillwater’s US and SA PGM Rustenburg operations completed IRMA self-assessments during 2022.
- During 2023, stage 1 for two sites (US and Rustenburg in SA) were completed.
- The next site, Marikana operations, will commence with a self-assessment during 2024.
- In 2020, the Marikana operations in South Africa have undergone an eTfS (Together for Sustainability) assessment.
- Sibanye-Stillwater also subscribes to the United Nations Global Compact, World Gold Council and the International Council on Mining and Metals.

3. Northam Platinum (<https://www.northam.co.za>)

- Northam committed to the Initiative for Responsible Mining Assurance (IRMA), which specifies a set of objectives and leading performance criteria for environmentally and socially responsible mining practices.
- During FY2023, Northam initiated a high-level gap assessment to get a better understanding of the various IRMA requirements.
- In FY2024, we will finalise the development of group alignment requirements and action plans for prioritised IRMA elements and thereafter the remaining elements to sufficiently complete the self-assessment process in 2026, and ultimately a third-party assessment in 2028.

4. Impala Platinum (<https://www.implats.co.za>)

- Implats was planning to engage IRMA auditors in calendar year (CY) 2024 and to complete an IRMA audit before June 2025. This plan had to be deferred as part of the company's cost cutting exercise.
- Implats plans to engage auditors at the earliest in the second half of CY2025, and to potentially complete an audit by mid CY2026.
- Should (PGM) prices recover, then we will communicate an update to our plans.
- Implats remains committed to participate in the IPA workshops and will continue to conduct internal gap analyses against IRMA, and where resources allow, address potential gaps.

5. Nornickel (<https://nornickel.com>)

- Nornickel is committed to complete full audit of its mines according to IRMA requirements, if and when allowed by IRMA. Currently, certification for Russian companies is put on hold.
- Overall information: Formal audit certification has been suspended at IRMA's request due to the geopolitical situation. Self-assessment of 8 operating mines, including 6 mines of Norilsk Division (including South Cluster project) and 2 mines of Kola Division, was completed in 2022. An independent review of the self-assessment as well as preparedness for audit for IRMA certification has been completed by ENSOR (ex-ERM Moscow team).
- Audit status: Audit is pending IRMA's permission. An independent review of self-assessment and compliance with IRMA Mining Standards for Norilsk and Kola Divisions (8 mines combined) was completed in 2022 (May-December 2022).
- Nornickel received final reports with independent review from ENSOR in Q1 2023. The company has amended its ICMM compliance roadmap to include compliance gaps identified against IRMA requirements. The joint roadmap is now in execution.



- Short-term target: To implement corrective actions listed in Nornickel's joint IRMA and ICMM compliance roadmap.
- In addition, in 2024, Nornickel is planning to contribute to IRMA working groups' discussion of the draft Standard for Responsible Mining and Mineral Processing 2.0.
- In 2021, Nornickel completed TfS audit of its Norilsk (Polar) Division and three independent PGM refineries, which processed Nornickel feed.
- All respective corrective actions were completed by Nornickel and its PGM refineries in 2022. Completion has been confirmed by TFs auditors.
- In 2021, the Company held consultations with ICMM Experts Panel. Since then, the application to ICMM has been suspended at ICMM's request. Nornickel confirms its ambition to apply to ICMM, once allowed. A roadmap, aiming to meet ICMM critical requirements, has been developed and is currently implemented. This roadmap has been also amended to include initiatives aiming at closing IRMA compliance gaps following completion of IRMA self-assessment and review.

6. Impala Bafokeng (former Royal Bafokeng Platinum)

After the acquisition of Royal Bafokeng Platinum by Implats, Impala Bafokeng is an integral part of Implats' business and will therefore also be integrated into the group's IRMA certification plans.