

F0. Introduction

F0.1

**(F0.1) Give a general description of and introduction to your organization.**

Impala Platinum Holdings Limited (Implats) is a global leading platinum group metals (PGMs) mining and refining company. Implats is has its corporate headquarters in Johannesburg, South Africa, with key operations located in the Bushveld Complex in South Africa, the Great Dyke in Zimbabwe and the palladium-dominant Lac des Iles Intrusive Complex in Canada. The Bushveld Complex and Great Dyke layered intrusions are unique in terms of size and geological continuity.

At Implats, we operate several mines in both South Africa, Zimbabwe and Canada. In South Africa, the company has the Rustenburg, Marula, and Two Rivers mines (with a 46% share in the latter, although it is not managed directly). In Zimbabwe, we have the Zimplats and Mimosa mines (with a 50% share in the latter, which is also not managed directly). Implats produced a total of 3.09 million oz of refined 6E production in this past reporting year, most of which was Platinum (1.43Moz), Palladium (1.07Moz), Rhodium (0.18Moz) and Nickel (16.5kt). Implats also operates a refinery located in Springs, Gauteng, South Africa, which plays a crucial role in processing the ore concentrate and matte generated from different operations. Additionally, the Refinery processes materials purchased by Impala Refining Services (IRS) from external companies, and it serves the purpose of utilising Implats' excess smelting and refining capacity effectively. Impala Canada, previously "North American Palladium", is a wholly owned subsidiary of Implats after being acquired in late 2019. The single operating asset of Impala Canada is the Lac des Iles Mine (LDI), situated in the Canadian province of Ontario, to the north of the City of Thunder Bay. The mining operation at LDI includes both underground and surface mining activities, as well as a concentrator. The underground operations at LDI use long-hole open stope and sub-level shrinkage mining methods.

Implats is listed on the Johannesburg Stock Exchange Limited (JSE) and has a secondary listing on A2X Markets in South Africa and is also a level 1 American Depositary Receipt programme in the United States of America. Implats establishes stakeholder relationships at each of its individual operations to most accurately and delicately manage the various economic, social and environmental issues that may arise. Implats' focus on sustainability and wholistic corporate governance, which is governed by the company's corporate governance strategy, is in line with the King IV Code Principles and the JSE Listing Requirements.

In this past reporting year, Implats' workforce consisted of 57 997 employees (including contractors) across all operations. Implats' operations are ISO 14 001:2015 certified, with the exception of the Implats Canada operations. Implats prioritises the health and safety of employees and the protection of surrounding environments. Implats promotes a culture ingrained with a focus on safety, well-being, and environmental responsibility, which serves as a platform to encourage positive behaviours across all levels. Implats has implemented compliance standards and conducts regular training sessions on health, safety, and environmental practices at all operations and has participated in the CDP for the past 15 years (since 2007). This is however the first CDP Forest Disclosure by Implats.

Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem. We ascertain the biodiversity impacts of our mining operations through environmental authorisation processes and manage these according to site-specific biodiversity management plans and standards.

F0.2

**(F0.2) State the start and end date of the year for which you are reporting data.**

	Start Date	End Date
Reporting year	July 1 2021	June 30 2022

F0.3

**(F0.3) Select the currency used for all financial information disclosed throughout your response.**

ZAR

F-MM0.9/F-CO0.9

**(F-MM0.9/F-CO0.9) Select the option that best describes the reporting boundary for which biodiversity-related issues are being reported?**

Companies, entities or groups over which financial control is exercised

F-MM0.10/F-CO0.10

**(F-MM0.10/F-CO0.10) Within your reporting boundary, are there any geographical areas, business units or mining projects excluded from your disclosure?**

No

F-MM9.1/F-CO9.1

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(F-MM9.1/F-CO9.1) Provide details on the mining projects covered by this disclosure, by specifying your project(s) type, location and mining method(s) used.

**Mining project ID**

Project 1

**Name**

Impala Rustenburg

**Share (%)**

96

**Country/Area**

South Africa

**Latitude**

-25.541437

**Longitude**

27.184399

**Project stage**

Production

**Mining method**

Underground

**Raw material(s)**

Copper

Gold

Platinum group metals

Nickel

Cobalt

Other non-ferrous metal, please specify (Chrome)

**Year extraction started/is planned to start**

1969

**Year of closure**

2039

**Description of project**

Impala Rustenburg has operations situated on the western limb of the world renowned Bushveld Complex near Rustenburg in South Africa. This operation comprises a multi-shaft mining complex and concentrating and smelting plants.

Impala holds contiguous mining and prospecting rights over a total area of 29 773 hectares. The Merensky and UG2 reefs are mined concurrently, and the mining method is predominantly conventional breast mining. Mining currently extends to a depth of around 1 6000 metres. The stopping width for Merensky Reef is typically about 1.3 metres, whilst that for UG2 is about 1.1 metres. Panel lengths vary from 15 to 30 metres for both Merensky and UG2 reefs.

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**Mining project ID**

Project 2

**Name**

Marula

**Share (%)**

73

**Country/Area**

South Africa

**Latitude**

-24.502626

**Longitude**

30.07072

**Project stage**

Production

**Mining method**

Underground

**Raw material(s)**

Copper

Gold

Platinum group metals

Nickel

Cobalt

Other non-ferrous metal, please specify (Chrome)

**Year extraction started/is planned to start**

2002

**Year of closure**

2036

**Description of project**

Marula is 73% owned by Implats and is one of the first operations to have been developed on the relatively under-exploited eastern limb of the Bushveld Complex in South Africa. It is in the Limpopo Province, some 35 kilometres north-west of Burgersfort. The operation comprises two decline shaft systems and a concentrator plant. Current mining activities target the UG2 reef only, which is accessed via two decline shaft systems. Driekop Shaft uses a hybrid mining method, while at Clapham Shaft, both hybrid and conventional mining methods are used. In the hybrid sections, all main development is done on reef, and stopping is carried out through conventional single-sided breast mining from a centre gully. Panel face lengths are approximately 16 to 24 metres, and the stopping width averages 1.25 metres. For the conventional operation, the footwall drives are developed on strike approximately 25 metres below the reef horizon with crosscut breakaways about 220 metres apart. Development is undertaken with drill rigs and dump trucks. Stope face drilling is done with hand-held pneumatic rock drills with air legs.

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**Mining project ID**

Project 3

**Name**

Impala Refineries

**Share (%)**

100

**Country/Area**

South Africa

**Latitude**

-26.22203

**Longitude**

28.437994

**Project stage**

Production

**Mining method**

Other, please specify (Refineries)

**Raw material(s)**

Copper

Gold

Platinum group metals

Nickel

Cobalt

**Year extraction started/is planned to start**

1968

**Year of closure****Description of project**

Impala Refineries is in Springs, to the east of Johannesburg, South Africa, and comprises both base and precious metals refineries.

The area around Impala Refineries is primarily used for gold mining and industrial activities, while the immediate surroundings consist mostly of urban areas. The refinery site was formerly occupied by East Geduld mines. Impala Refineries processes materials from Impala Rustenburg, including processed materials from Impala mines, Marula, Two Rivers, Zimplats, and other small mining contracts, refining them to produce copper, nickel, cobalt, gold, and platinum group metals

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**Mining project ID**

Project 4

**Name**

Zimplats

**Share (%)**

87

**Country/Area**

Zimbabwe

**Latitude**

-18.664994

**Longitude**

30.356575

**Project stage**

Production

**Mining method**

Open-cut and underground

**Raw material(s)**

Copper

Platinum group metals

Nickel

Cobalt

**Year extraction started/is planned to start**

2001

**Year of closure**

2062

**Description of project**

Zimplats is 87% owned by Implats. Its Ngezi operation is located on the Hartley Geological Complex on the Zimbabwean Great Dyke approximately 150 kilometres south-west of Harare. The Hartley Geological complex is the largest of the PGM-bearing complexes containing 80% of the known PGM resources in Zimbabwe. Zimplats operates four shallow mechanised underground mines, one open-pit and two concentrators at Ngezi. The Selous Metallurgical Complex (SMC), located some 77 kilometres north of the underground operations, comprises a concentrator and a smelter.

**Mining project ID**

Project 5

**Name**

Impala Canada

**Share (%)**

100

**Country/Area**

Canada

**Latitude**

49.169513

**Longitude**

89.594222

**Project stage**

Production

**Mining method**

Open-cut and underground

**Raw material(s)**

Copper

Gold

Platinum group metals

Nickel

Cobalt

**Year extraction started/is planned to start**

1993

**Year of closure**

2033

**Description of project**

Impala Canada, previously known as North American Palladium, is 100% owned by Implats following its acquisition in late 2019. The Lac des Iles mine (LDI), Impala Canada's single operating asset, is in the Canadian province of Ontario, north of the city of Thunder Bay. LDI comprises of underground and surface mining operations and a concentrator.

**F-MM9.2/F-CO9.2**

**(F-MM9.2/F-CO9.2) Can you disclose the mining project area and the area of land disturbed for each of your mining projects?**

	Disclosing mining project area and area of land disturbed?	Comment
Row 1	Yes	A mine has social and environmental impacts long after the end of its operational phase. Through integrated closure planning and concurrent rehabilitation, we strive for our mines to leave a positive, healthy and sustainable legacy.  Implats owns a total area of 138 468 hectares. At the end of 2022, the total amount of land disturbed and rehabilitated at our mining sites were 290.2 hectares. The total area of land disturbed to date is 7 453.

**F-MM9.2a/F-CO9.2a**

**(F-MM9.2a/F-CO9.2a) Provide details on the mining project area and the area of land disturbed for each of your mining projects.**

**Mining project ID**

Project 1

**Total area of owned land/lease/concession (hectares)**

29773

**Total area disturbed to date (hectares)**

2197

**Area disturbed in the reporting year (hectares)**

2.5

**Type(s) of habitat disturbed in the reporting year**

Natural habitat

**Comment**

Mining operations are conducted in terms of contiguous mining and prospecting rights over a total area of 29 773 hectares. These were converted into new order rights in 2008 and awarded for a 30-year period.

A 2.5ha of land was disturbed during the reporting period for the extension of a car park at one of the shaft complexes.

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**Mining project ID**

Project 2

**Total area of owned land/lease/concession (hectares)**

5494

**Total area disturbed to date (hectares)**

405

**Area disturbed in the reporting year (hectares)**

0

**Type(s) of habitat disturbed in the reporting year**

Natural habitat

**Comment**

Marula holds two contiguous mining rights and a prospecting right covering 5 494 hectares across the farms Winaarshoek and Clapham, and portions of the farms Driekop, Forest Hill and Hackney. Marula also has a royalty agreement with Modikwa which allows limited mining on an area adjacent to the Driekop shaft.

No new land was disturbed at Marula during the reporting period.

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**Mining project ID**

Project 3

**Total area of owned land/lease/concession (hectares)**

245

**Total area disturbed to date (hectares)**

122

**Area disturbed in the reporting year (hectares)**

0

**Type(s) of habitat disturbed in the reporting year**

Modified habitat

**Comment**

Impala Refineries processes material received from Impala Rustenburg which includes processed material from Impala mines, Marula, Two Rivers, Zimplats and other small mining contracts. These materials are refined to produce copper, nickel, cobalt, gold and platinum group metals.

The existing Refineries site was previously occupied by East Geduld mines.

No new land was disturbed at Refineries during the reporting period.

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**Mining project ID**

Project 4

**Total area of owned land/lease/concession (hectares)**

24632

**Total area disturbed to date (hectares)**

3729

**Area disturbed in the reporting year (hectares)**

115

**Type(s) of habitat disturbed in the reporting year**

Natural habitat

**Comment**

Zimplats operates four shallow mechanised underground mines, one open-pit and two concentrators at Ngezi. The Selous Metallurgical Complex (SMC), located some 77 kilometres north of the underground operations, comprises a concentrator and a smelter. Mining infrastructure consists of five portals (decline shafts). The deepest operating depth is currently approximately 310 metres at Bimha Mine.

A total of 115ha was disturbed/cleared at Zimplats for the construction of a new solar farm.

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**Mining project ID**

Project 5

**Total area of owned land/lease/concession (hectares)**

78324

**Total area disturbed to date (hectares)**

1000

**Area disturbed in the reporting year (hectares)**

0

**Type(s) of habitat disturbed in the reporting year**

Natural habitat

**Comment**

Lac des iles comprises an underground mine, surface mining activities, and a concentrator plant and benefits from year-round road access and reliable power from the provincial grid. The underground Ldi operations employ long-hole, open-stope and sub-level shrinkage mining methods. The processing mill has a capacity of 13 500 tonnes

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per day (tpd). Ldi is currently ramping up its underground performance to 12 000 tpd to become one of Canada's largest underground mines and further position itself as a low-cost, long-term, sustainable palladium producer that continues to generate and increase stakeholder value. Platinum, gold, nickel and copper are the primary by-products at Lac des Iles.

No new land was disturbed at Impala Canada during the reporting period.

## F-MM9.3/F-CO9.3

### (F-MM9.3/F-CO9.3) Are any of your mining projects located in or near legally protected and internationally recognized areas?

	Are any of your projects in or near?	Comment
Legally protected area(s)	Yes	The Zimplats operation mine lease area includes a 276ha section of land within the Ngezi Recreational Park's boundary. Our rehabilitation and mine closure activities comply with the conditions outlined by the Ministry of Environment in the lease agreement regarding the protection and restoration of biodiversity in the lease area.
UNESCO World Heritage sites	No	Impala Platinum commits to neither exploring nor developing new mines in World Heritage sites.
UNESCO Biosphere Reserves	Yes	Impala Rustenburg is approximately 50km from a Biosphere Reserve and Ramsar site - Kgaswane Nature Reserve. Our operations do not have any direct impact on the site, and continues to partner in environmental education and conservation initiatives in the area.
Ramsar sites	Yes	Impala Springs operations are near (approximately 50km) the Blesbokspruit, a designated Ramsar Convention Wetlands of International Importance. Impala Rustenburg is approximately 50km from a Ramsar site at Kgaswane Nature Reserve and Pilanesberg National Park. Both operations do not have any direct impact on the sites, and continues to partner in environmental education and conservation initiatives in the area.  Impala Rustenburg supports regional and national conservation programmes and, since 2016, has been a proud sponsor of a 5 300ha nature reserve on the northern slopes of the Magaliesberg, working in collaboration with the North West Parks and Tourism Board. The reserve is home to a wide range of species of flora, mammals and birdlife and is designated as a protected UNESCO Ramsar site.
Key Biodiversity Area(s)	No	Impala Platinum does not operate in any areas considered as sites contributing significantly to the global persistence of biodiversity.

## F-MM9.3a/F-CO9.3a

### (F-MM9.3a/F-CO9.3a) Provide details on mining projects that are in or near legally protected and internationally recognized areas.

#### Mining project ID

Project 1

#### Type of legally protected/ internationally recognized area

Legally protected area

#### Protected area category (IUCN classification)

Not applicable

#### Name of area

Pilanesberg National Park

#### Proximity

Up to 50 km

#### Area of overlap (hectares)

<Not Applicable>

#### Please explain

Impala Rustenburg is approximately 30km south of the Pilanesberg National Park.

#### Mining project ID

Project 1

#### Type of legally protected/ internationally recognized area

UNESCO Biosphere Reserves

#### Protected area category (IUCN classification)

<Not Applicable>

#### Name of area

Kgaswane Nature Reserve

#### Proximity

Up to 50 km

#### Area of overlap (hectares)

<Not Applicable>

#### Please explain

Impala Rustenburg is approximately 30km north of the Biosphere UNESCO Biosphere Reserve site - Kgaswane Nature Reserve.

Impala Rustenburg supports regional and national conservation programmes and, since 2016, has been a proud sponsor of a 5 300 ha nature reserve on the northern slopes of the Magaliesberg, working in collaboration with the North West Parks and Tourism Board. The reserve is home to a wide range of species of flora, mammals and

birdlife and is designated as a protected UNESCO Biosphere Reserve

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**Mining project ID**

Project 1

**Type of legally protected/ internationally recognized area**

Ramsar site

**Protected area category (IUCN classification)**

<Not Applicable>

**Name of area**

Kgaswane Nature Reserve

**Proximity**

Up to 50 km

**Area of overlap (hectares)**

<Not Applicable>

**Please explain**

Impala Rustenburg is approximately 30km north of the Ramsar site - Kgaswane Nature Reserve.

Impala Rustenburg supports regional and national conservation programmes and, since 2016, has been a proud sponsor of a 5 300 ha nature reserve on the northern slopes of the Magaliesberg, working in collaboration with the North West Parks and Tourism Board. The reserve is home to a wide range of species of flora, mammals and birdlife and is designated as a protected Ramsar site.

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**Mining project ID**

Project 3

**Type of legally protected/ internationally recognized area**

Ramsar site

**Protected area category (IUCN classification)**

<Not Applicable>

**Name of area**

Blesbokspruit Wetland Reserve

**Proximity**

Up to 10 km

**Area of overlap (hectares)**

<Not Applicable>

**Please explain**

Impala Springs operations are near the Blesbokspruit, a designated Ramsar Convention Wetlands of International Importance. Although our operation does not have any direct impact on the wetlands, it continues to partner in environmental education and conservation initiatives in the area.

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**Mining project ID**

Project 4

**Type of legally protected/ internationally recognized area**

Legally protected area

**Protected area category (IUCN classification)**

Category IV- VI

**Name of area**

Ngezi Recreational Park

**Proximity**

Overlap

**Area of overlap (hectares)**

276

**Please explain**

The Zimplats operation mine lease area includes a 276ha section of land within the Ngezi Recreational Park's boundary. Our rehabilitation and mine closure activities comply with the conditions outlined by the Ministry of Environment in the lease agreement regarding the protection and restoration of biodiversity in the lease area.

The Ngezi River squeezes through the Great Dyke in a narrow gorge and forms a good natural site for a dam, To the west of the wooded rolling hills of the Great Dyke crowd the horizon, along the lake are marshes and rolling plains of Highveld msasa

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**F-MM9.4/F-CO9.4**

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**(F-MM9.4/F-CO9.4) Are there artisanal and small-scale mining (ASM) operations active in your mining concessions or in their area of influence?**

Yes

**F-MM9.4a/F-CO9.4a**

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**(F-MM9.4a/F-CO9.4a) Provide details on artisanal and small-scale mining operations active in your mining project areas or in their area of influence. Indicate the associated challenges, if there are any.**

**Mining project ID**

Project 2

**Where does artisanal/small-scale mining operations occur?**

Inside mining concession/lease

**Legal status of artisanal and small-scale mining activity**

Illegal / informal

**Type of challenges**

No challenge identified

**Please explain**

There are community members staying within the mining lease area that are collecting chrome ore lumps outside of the operational areas.

**Mining project ID**

Project 3

**Where does artisanal/small-scale mining operations occur?**

In the area of influence of mining project

**Legal status of artisanal and small-scale mining activity**

Illegal / informal

**Type of challenges**

Pollution

**Please explain**

Artisanal mining activities are taking place within the footprint of the tailings storage facility (TSF) owned by a neighbouring mine. To address this issue, the South African Police Service and Impala's internal security forces collaborate on organized raids to deter artisanal mining activities on site. However, artisanal and small-scale mining (ASM) remains a national concern, and the Illegal Mining Forum is actively monitoring and addressing this activity.

**F-MM9.5/F-CO9.5**

**(F-MM9.5/F-CO9.5) Have biodiversity-related issues led to detrimental impact(s) on your business in the reporting year?**

	Biodiversity-related issues led to detrimental impacts on the business?	Comment
Row 1	No	Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem. We ascertain the biodiversity impacts of our mining operations through environmental authorisation processes and manage these according to site-specific biodiversity management plans and standards. During the reporting year, Implats was exposed to the following two biodiversity-related issues, although none of these resulted in detrimental impacts on our business: 1. Excessive veld fires during the winter months in Rustenburg, which impacted the overall biodiversity within the larger regional setting 2. Communal overgrazing is still affecting the regional biodiversity at our Rustenburg operation.

**F-MM9.6/F-CO9.6**

**(F-MM9.6/F-CO9.6) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for violation of biodiversity-related regulation?**

	Any penalties for violation of biodiversity-related regulation?	Comment
Row 1	No	This year we recorded four limited impact (level 3) incidents, a 43% reduction on the seven incidents recorded in 2021, all relating to water effluent at our managed operations. Each incident was investigated, and remedial action taken. These reported incidents are assigned based on internal ISO classifications and no fines, enforcement orders or penalties related to biodiversity regulations were issued to Impala Platinum.

**F10 Procedures**

**F-MM10.1/F-CO10.1**



**(F-MM10.1/F-CO10.1) Have biodiversity impacts and risks of your mining projects been assessed before the project development stage?**

	Biodiversity impacts and risks assessed before the project development stage?	Please explain
Row 1	Yes, in all cases	<p>The Implats Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management.</p> <p>Prior to obtaining environmental authorization at any of our sites, it is a regulatory requirement for us to conduct comprehensive biodiversity impact assessments. These assessments ensure that the biodiversity impacts and risks associated with our mining projects are thoroughly evaluated before project development proceeds.</p> <p>Our overall commitments are:</p> <ul style="list-style-type: none"> <li>• Implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems</li> <li>• Neither explore nor develop new mines in World Heritage sites</li> <li>• Respect legally designated protected areas</li> <li>• Design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated</li> </ul>

**F-MM10.1a/F-CO10.1a**

**(F-MM10.1a/F-CO10.1a) Select the options that best describe your procedures for identifying and assessing biodiversity-related impacts and risks.**

**Mining project ID**

Project 1

**Type of assessment**

Full-scale environmental and social impact assessment

**Impacts considered**

Direct impacts  
 Indirect impacts  
 Cumulative impacts

**Scope defined by**

Governmental agency requirements  
 Company own standards and/or policies

**Methods and tools**

Desk-based research  
 Field surveys  
 Expert consultation  
 Stakeholder consultation/analysis  
 IBAT for Business  
 National specific tools and databases

**Aspects considered**

Locational alternatives  
 Threatened species  
 Migratory species  
 Endemic species  
 Protected areas  
 Critical habitats  
 Natural habitats  
 Ecosystem services

**Baseline biodiversity data available?**

Yes

**Is the Environmental Impact Statement publicly available?**

Yes

**Please explain**

Implats is a PGE-focused mining company which undertakes its activities in a PGE manner that strives to maximise the positive impacts PGEs have on the environment and minimise or eliminate any negative environmental impacts.

The Company is committed to responsible stewardship of natural resources and the ecological environment in a sustainable manner.

Implats is committed to:

- Continually improving environmental performance and reducing any adverse environmental impacts.
- The integration of environmental management into management practices throughout the Company.
- Minimising the use of consumptive resources and promoting the reduction and recycling of waste products.
- Rehabilitating disturbed land and protecting environmental biodiversity.
- Exercising prudence with ecological resources.
- Managing environmental risk in the workplace and surrounding areas.
- Complying with the applicable environmental obligations to which the Company subscribes.

**Mining project ID**

Project 2

**Type of assessment**

Full-scale environmental and social impact assessment

**Impacts considered**

Direct impacts  
 Indirect impacts

Cumulative impacts

**Scope defined by**

Governmental agency requirements  
Company own standards and/or policies

**Methods and tools**

Desk-based research  
Field surveys  
Landscape-scale field surveys  
Expert consultation  
Stakeholder consultation/analysis  
IBAT for Business  
National specific tools and databases

**Aspects considered**

Locational alternatives  
Threatened species  
Migratory species  
Endemic species  
Protected areas  
Critical habitats  
Natural habitats  
Ecosystem services

**Baseline biodiversity data available?**

Yes

**Is the Environmental Impact Statement publicly available?**

Yes

**Please explain**

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- Minimising the use of consumptive resources and promoting the reduction and recycling of waste products.
- Rehabilitating disturbed land and protecting environmental biodiversity.
- Exercising prudence with ecological resources.
- Managing environmental risk in the workplace and surrounding areas.
- Complying with the applicable environmental obligations to which the Company subscribes

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**Mining project ID**

Project 3

**Type of assessment**

Full-scale environmental and social impact assessment

**Impacts considered**

Direct impacts  
Indirect impacts  
Cumulative impacts

**Scope defined by**

Governmental agency requirements  
Company own standards and/or policies

**Methods and tools**

Desk-based research  
Field surveys  
Landscape-scale field surveys  
Expert consultation  
Stakeholder consultation/analysis  
IBAT for Business  
National specific tools and databases

**Aspects considered**

Locational alternatives  
Threatened species  
Migratory species  
Endemic species  
Protected areas  
Critical habitats  
Natural habitats  
Ecosystem services

**Baseline biodiversity data available?**

No

**Is the Environmental Impact Statement publicly available?**

Yes

**Please explain**

Implats is a PGE-focused mining company which undertakes its activities in a manner that strives to maximise the positive impacts PGEs have on the environment and minimise or eliminate any negative environmental impacts.

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- The integration of environmental management into management practices throughout the Company.
- Minimising the use of consumptive resources and promoting the reduction and recycling of waste products.
- Rehabilitating disturbed land and protecting environmental biodiversity.
- Exercising prudence with ecological resources.
- Managing environmental risk in the workplace and surrounding areas.
- Complying with the applicable environmental obligations to which the Company subscribes.

The baseline biodiversity data for this site is not available as Refinerries is established in an area which was previously used by another mining company and had been altered.

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#### **Mining project ID**

Project 4

#### **Type of assessment**

Full-scale environmental and social impact assessment

#### **Impacts considered**

Direct impacts  
Indirect impacts  
Cumulative impacts

#### **Scope defined by**

Governmental agency requirements  
Company own standards and/or policies

#### **Methods and tools**

Desk-based research  
Field surveys  
Landscape-scale field surveys  
Expert consultation  
Stakeholder consultation/analysis  
IBAT for Business  
National specific tools and databases

#### **Aspects considered**

Locational alternatives  
Threatened species  
Migratory species  
Endemic species  
Protected areas  
Critical habitats  
Natural habitats  
Ecosystem services

#### **Baseline biodiversity data available?**

Yes

#### **Is the Environmental Impact Statement publicly available?**

Yes

#### **Please explain**

Implats is a PGE-focused mining company which undertakes its activities in a manner that strives to maximise the positive impacts PGEs have on the environment and minimise or eliminate any negative environmental impacts.

The Company is committed to responsible stewardship of natural resources and the ecological environment in a sustainable manner.

Implats is committed to:

- Continually improving environmental performance and reducing any adverse environmental impacts.
- The integration of environmental management into management practices throughout the Company.
- Minimising the use of consumptive resources and promoting the reduction and recycling of waste products.
- Rehabilitating disturbed land and protecting environmental biodiversity.
- Exercising prudence with ecological resources.
- Managing environmental risk in the workplace and surrounding areas.
- Complying with the applicable environmental obligations to which the Company subscribes.

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#### **Mining project ID**

Project 5

#### **Type of assessment**

Full-scale environmental and social impact assessment

#### **Impacts considered**

Direct impacts  
Indirect impacts  
Cumulative impacts

#### **Scope defined by**

Governmental agency requirements  
Company own standards and/or policies

**Methods and tools**

Desk-based research  
 Field surveys  
 Landscape-scale field surveys  
 Expert consultation  
 Stakeholder consultation/analysis  
 IBAT for Business  
 National specific tools and databases

**Aspects considered**

Locational alternatives  
 Threatened species  
 Migratory species  
 Endemic species  
 Protected areas  
 Critical habitats  
 Natural habitats  
 Ecosystem services

**Baseline biodiversity data available?**

Yes

**Is the Environmental Impact Statement publicly available?**

Yes

**Please explain**

Implats is a PGE-focused mining company which undertakes its activities in a manner that strives to maximise the positive impacts PGEs have on the environment and minimise or eliminate any negative environmental impacts.

The Company is committed to responsible stewardship of natural resources and the ecological environment in a sustainable manner.

Implats is committed to:

- Continually improving environmental performance and reducing any adverse environmental impacts.
- The integration of environmental management into management practices throughout the Company.
- Minimising the use of consumptive resources and promoting the reduction and recycling of waste products.
- Rehabilitating disturbed land and protecting environmental biodiversity.
- Exercising prudence with ecological resources.
- Managing environmental risk in the workplace and surrounding areas.
- Complying with the applicable environmental obligations to which the Company subscribes

## F-MM10.2/F-CO10.2

**(F-MM10.2/F-CO10.2) Does your organization undertake a corporate-level procedure to assess biodiversity-related risks to your business?**

	Is there a procedure to assess biodiversity-related risks?	Comment
Row 1	Yes	Our efforts to reduce the disturbance and loss of biodiversity, habitats and ecosystems are underpinned by ongoing rehabilitation and concurrent revegetation of open pit and TSF facilities. Implats is also committed to preventing deforestation and includes specific clauses in its timber supply contracts to ensure responsible sourcing.

## F-MM10.2a/F-CO10.2a

**(F-MM10.2a/F-CO10.2a) Select the options that best describe your procedure for identifying and assessing biodiversity-related risks.****Row 1****Risk assessment procedure**

Assessed as part of an established enterprise risk management framework

**Frequency of assessment**

Annually

**How far into the future are risks considered?**

3 to 6 years

**Tools and methods used to identify and assess risks**

Internal company methods  
 External consultants  
 IBAT for Business  
 National specific tools and databases

**Please explain**

In South Africa, we monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits.

By 2025 we plan to have updated all site-specific biodiversity action and management plans and implement biodiversity monitoring programmes.

At Implats, biodiversity management plans derived from the EIAs continue to form the basis of its actions to mitigate any negative impacts on biodiversity.

Comprehensive environmental monitoring is carried out by Impala Canada in accordance with federal and provincial regulatory requirements and with its relevant permits.

(F-MM10.2b/F-CO10.2b) Which of the following issues are considered in your organization's biodiversity-related risk assessment(s)?

	Relevance & inclusion	Please explain
Deforestation	Relevant, always included	<p>Our efforts to reduce the disturbance and loss of biodiversity, habitats and ecosystems are underpinned by ongoing rehabilitation and concurrent revegetation of open pit and TSF facilities. Implats is committed to preventing deforestation and includes specific clauses in its timber supply contracts to ensure responsible sourcing.</p> <p>In South Africa, we monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits.</p> <p>Zimplats' main control measure against deforestation is the land and vegetation clearance permitting system administered by the Ministry of Environment rehabilitation procedure. Vegetation loss is compensated for through offset initiatives where trees must be replaced on a 1:1 basis as a minimum. Measures and practices in place to mitigate deforestation include collecting seeds of important plant species ahead of planned projects, revegetation initiatives, conducting awareness training sessions for employees and contractors and participating in and supporting national tree-planting programmes.</p> <p>In line with our 2030 goal and interim targets, a Group rehabilitation, mine closure and biodiversity policy statement was approved. Each operation will develop and implement an integrated biodiversity, mine closure and rehabilitation plan to achieve our shorter-term targets and commitments.</p>
Legally protected areas	Relevant, always included	<p>Our commitment to biodiversity management is set out in the Biodiversity, Rehabilitation and Closure Policy Statement, Implats is committed respecting legally designated protected areas which include Natural and World Heritage Sites.</p> <p>A critical element in being able to determine our progress on reducing our environmental footprint is our ability to monitor and manage our compliance both continuously and consistently, and to seek improvements to ensure we meet our 2030 goals</p>
Internationally recognized areas	Relevant, always included	<p>Our commitment to biodiversity management is set out in the Biodiversity, Rehabilitation and Closure Policy Statement, Implats is committed to neither exploring nor developing new mines in World Heritage sites.</p>
Threatened, migratory and endemic species	Relevant, always included	<p>Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem. We ascertain the biodiversity impacts of our mining operations through environmental authorisation processes and manage these according to site-specific biodiversity management and monitoring plans and standards.</p> <p>In South Africa, we monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits.</p> <p>Impala Rustenburg continues to carry out summer and winter bird surveys, which record an abundance of species across the mining footprint. The Rockwall Dam and the pool on top of the TSF provide important habitats for common aquatic species, as well as for those of regional conservation importance, and play an important role in conserving various species of wildlife.</p> <p>To date, several habitats for species of conservation concern (including special concern and provincially or regionally rare species) have been identified at Impala Canada, which will be considered in the planning and construction of the greenfield project.</p> <p>In line with our 2030 goal and interim targets, a Group rehabilitation, mine closure and biodiversity policy statement was approved. Each operation will develop and implement an integrated biodiversity, mine closure and rehabilitation plan to achieve our shorter-term targets and commitments.</p>
Ecosystem services	Relevant, always included	<p>Our efforts to reduce the disturbance and loss of biodiversity, habitats and ecosystems are underpinned by ongoing rehabilitation and concurrent revegetation of open pit and TSF facilities.</p> <p>Our commitment to biodiversity management is set out in the Biodiversity, Rehabilitation and Closure Policy Statement, Implats is committed to implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems.</p> <p>In South Africa, we monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits.</p> <p>In line with our 2030 goal and interim targets, a Group rehabilitation, mine closure and biodiversity policy statement was approved. Each operation will develop and implement an integrated biodiversity, mine closure and rehabilitation plan to achieve our shorter-term targets and commitments.</p>
Regulation	Relevant, always included	<p>A critical element in being able to determine our progress on reducing our environmental footprint is our ability to monitor and manage our compliance both continuously and consistently, and to seek improvements to ensure we meet our 2030 goals.</p> <p>We continuously monitor regulatory changes to ensure compliance through action plans and rigorously track progress against both internal and external audit findings. Compliance reports, alongside internal audit reports, are shared with the relevant board sub-committees every quarter. We report any deviations from regulatory conditions to the relevant authorities and engage transparently with the relevant stakeholders to address any compliance matters that should arise. We actively participate in regional industry associations to support policy development and promotion of best practices.</p> <p>Our Impala Springs, Impala Rustenburg, Marula and Zimplats operations retained ISO 14001:2015 certification. Impala Canada remains on track to achieving certification by 2025 in line with our 2030 goal of having all our operations certified. Impala Springs retained its Responsible Care® certification, the global chemical industry's comprehensive safety, health, environment and security performance improvement initiative.</p>
Indigenous peoples	Relevant, always included	<p>The Group's ongoing contribution to the social, economic and institutional development of our communities is led by meaningful engagement with our community stakeholders and is based on the needs identified in this two-way process.</p> <p>In Canada, we adhere to all federal and provincial requirements for engagement with indigenous people, which includes, but is not limited to, fulfilling all foundational requirements for duty to consult (federal), as well as specific engagement and consultation requirements for exploration, environmental stewardship and monitoring and permitting (provincial level).</p>
Local communities	Relevant, always included	<p>Implats is committed to respecting the human rights and the dignity of all people as demonstrated by the integration of human rights risk management into our business processes. We have included human rights' commitments in our code of ethics, engage with our employees, our communities and other stakeholders as applicable on our human rights impacts, and report on our performance. Implats abides by and appreciates that the United Nations Guiding Principles on Business and Human Rights (UNGPs) remains a vanguard for organisations across the world for ensuring the protection of human rights. We remain committed to the United Nations Global Compact, and our security contractors follow the Voluntary Principle on Security and Human Rights (VPSHR).</p> <p>Our approach is aligned with the UNGPs, and we subscribe to the principles and abide by the laws and strong human rights-related regulations in our operating jurisdictions. We uphold the basic human rights enshrined in the International Labour Organisation in our workplace.</p> <p>The long-term viability of our business is linked to the wellbeing of our local communities. We go beyond compliance to deliver a lasting positive contribution to all those affected by our operations.</p> <p>The Group's ongoing contribution to the social, economic and institutional development of our communities is led by meaningful engagement with our community stakeholders and is based on the needs identified in this two-way process.</p>
Other, please specify	Please select	

(F-MM10.2c/F-CO10.2c) Which of the following stakeholders are considered in your organization’s biodiversity-related risk assessments?

	Relevance & inclusion	Please explain
Customers	Relevant, sometimes included	<p>Implats has an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>There is a growing demand from customers for assurance that the minerals and metals that they buy are sourced ethically and produced responsibly. Customers are engaged directly, through surveys and industry forums. The group conducted its two-yearly comprehensive customer satisfaction survey. The survey once again demonstrated Implats’ strong brand image. Implats has committed to conduct an audit against the Initiative for Responsible Mining Assurance (IRMA) standard at one of its operations by 2025.</p>
Employees	Relevant, always included	<p>Implats has an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Employees are engaged through extensive communications, reinforced awareness, messaging, training campaigns as well as management, employee and contactors forums.</p> <p>At operational level, stakeholder engagement has a direct reporting line to each operation’s chief executive. A module on stakeholder engagement is included in our leadership development programmes to enhance management capability.</p>
Investors	Relevant, always included	<p>Implats has an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Investors or shareholders are engaged through written submissions on various platforms, during interim and year-end presentations, roadshows, through participation in investor conferences and directly.</p> <p>Key commitments from the Implats Biodiversity, Rehabilitation and Closure Policy Statement, related to stakeholder engagements include: Implats’ committed to engaging external stakeholders to develop tools and guidance to integrate biodiversity management with land use planning; concurrently rehabilitating all impacted land, aiming to restore land to a beneficial state developed in consultation with all relevant stakeholders; developing closure outcomes in consultation with all relevant stakeholders that minimize adverse impacts and maximize post-closure stakeholder value; and finally implementing measures at closure to afford economic opportunities for stakeholders and address closure-related environmental and social.</p>
Local communities	Relevant, always included	<p>Implats has an effective stakeholder engagement function. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Our mine closure and rehabilitation commitments are to develop closure outcomes in consultation with all relevant stakeholders that minimise adverse impacts and maximise post-closure value and to implement measures at closure to afford economic opportunities for stakeholders and address closure-related environmental and social aspects. Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Although we have a statutory obligation to restore land to grazing as a minimum, we are constantly reviewing and aligning our post-closure land use in consultation with stakeholders.</p> <p>We engage with local communities through a range of formal ongoing processes. This includes active participation in recognised community business forums and the use of notice boards and company communication channels to ensure effective communication. The company also maintains regular and meaningful engagement with community leaders and structures, conducting trustees meetings both online and in-person. Additionally, we maintain continuous two-way communication channels with indigenous partners and follows the duty-to-consult process, which includes providing information and seeking responses. Furthermore, the company actively participates in the Mine Community Leadership Engagement Forum (MCLEF), an established structure for addressing community-related issues. Implats also conducts community awareness campaigns in Turf Town, the residential area associated with the mining operation, using loud hailers to effectively reach and engage with the community.</p>
Indigenous peoples	Relevant, always included	<p>We have an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Our mine closure and rehabilitation commitments are to develop closure outcomes in consultation with all relevant stakeholders that minimise adverse impacts and maximise post-closure value and to implement measures at closure to afford economic opportunities for stakeholders and address closure-related environmental and social aspects. Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Although we have a statutory obligation to restore land to grazing as a minimum, we are constantly reviewing and aligning our post-closure land use in consultation with stakeholders.</p> <p>Impala Canada is our only operation exposed to indigenous peoples and we engage with them through a range of formal and ongoing processes. We maintain continuous two-way communication channels with indigenous partners and follows the duty-to-consult process, which includes providing information and seeking responses.</p> <p>During the reporting year, Impala Canada engaged with local indigenous communities regarding the cultural importance of the land within the operation’s tailings project footprint. Consultations with stakeholders are ongoing and are expected to be completed by early 2023.</p>
NGOs	Relevant, sometimes included	<p>Implats has an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Our mine closure and rehabilitation commitments are to develop closure outcomes in consultation with all relevant stakeholders that minimise adverse impacts and maximise post-closure value and to implement measures at closure to afford economic opportunities for stakeholders and address closure-related environmental and social aspects. Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities, and rehabilitating the land around our operations when operations cease. Although we have a statutory obligation to restore land to grazing as a minimum, we are constantly reviewing and aligning our post-closure land use in consultation with stakeholders.</p>

	Relevance & inclusion	Please explain
Regulators	Relevant, always included	<p>Implats has an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy takes into account King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Our mine closure and rehabilitation commitments are to develop closure outcomes in consultation with all relevant stakeholders that minimise adverse impacts and maximise post-closure value and to implement measures at closure to afford economic opportunities for stakeholders and address closure-related environmental and social aspects. Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Although we have a statutory obligation to restore land to grazing as a minimum, we are constantly reviewing and aligning our post-closure land use in consultation with stakeholders.</p> <p>Implats engages with regulators and government bodies in a wide range of interactions and collaborations as part of its normal business operations. Throughout the year, the company has actively engaged with various regulatory entities and government departments. These engagements have included interactions with the Department of Labour, Department of Health, Department of Education, Department of Mineral Resources and Energy, Limpopo Department of Economic Development, Environment and Tourism, the Zimbabwe Chamber of Mines, the Business Council for Sustainable Development, Ontario Ministry of Environment, Conservation and Parks, and policy advisors in the Canadian government. These engagements ensure compliance with regulatory requirements, foster meaningful dialogue, and contribute to the development of sustainable practices in the industry.</p>
Suppliers	Relevant, always included	<p>Implats has an effective stakeholder engagement function, aimed at building and sustaining value-enhancing relations with all key stakeholders. Stakeholders are defined as those individuals or groups that have interests that are, or could be, affected by our activities and decisions. Our stakeholder engagement philosophy considers King IVTM and the overarching AA1000 Assurance Standard principles of materiality, inclusiveness and responsiveness. We have an overarching stakeholder-centric system to assist our operations with monitoring and managing their stakeholder engagement activities. This is overseen by the Group executive: stakeholder relations.</p> <p>Creating a sustainable supply chain drives value creation and success for businesses and for society. The principles of good corporate governance and sustainability play a leading role in the longevity of companies. At Implats, we are committed to responsible business practices to our supply chain partners too.</p> <p>In seeking to create a better future, our relationships are underpinned by the Implats values to respect, care and deliver, including those with our suppliers and contractors. In turn, we expect our suppliers and contractors to adhere to the Implats Group's policies on governance, compliance, ethics, fraud, transparency, and risk.</p> <p>The Implats Supplier and Contractors Code of Conduct emphasizes the importance of responsible environmental stewardship and sets expectations for suppliers to align with these principles. It requires suppliers and contractors to adopt effective environmental policies, comply with relevant legislation and regulations, provide training on environmental principles and ethical practices to employees, and implement environmental management programs and systems, including ISO 14001 standards, to ensure compliance and accountability</p>
Other stakeholders, please specify	Please select	

## F-MM10.3/F-CO10.3

### (F-MM10.3/F-CO10.3) Do you adopt biodiversity action plans to manage your impacts on biodiversity?

Yes

## F-MM10.3a/F-CO10.3a

### (F-MM10.3a/F-CO10.3a) Describe your criteria for defining which sites are required to produce biodiversity action plans.

The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Implats is further committed to preparing site-specific biodiversity action plans in line with regulatory, legal, and other requirements.

We continuously monitor regulatory changes to ensure compliance through action plans and rigorously track progress against both internal and external audit findings. Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem. We ascertain the biodiversity impacts of our mining operations through environmental authorisation processes and manage these according to site-specific biodiversity management plans and standards.

Our efforts to reduce the disturbance and loss of biodiversity, habitats and ecosystems are underpinned by ongoing rehabilitation and concurrent revegetation of open pit and TSF facilities. Implats is also committed to preventing deforestation and includes specific clauses in its timber supply contracts to ensure responsible sourcing.

Over the next five years we plan to spend R45 million on initiatives to align to our 2030 biodiversity goals.

In South Africa, we monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits. We continuously undertake dedicated projects to improve biodiversity and compliance with legislation.

At Zimplats, biodiversity management plans derived from the EIAs continue to form the basis of its actions to mitigate any negative impacts on biodiversity. Our rehabilitation and mine closure activities comply with the conditions outlined by the Ministry of Environment in the lease agreement regarding the protection and restoration of biodiversity in the lease area.

Comprehensive environmental monitoring is carried out by Impala Canada in accordance with federal and provincial regulatory requirements and with its relevant permits. This includes, but is not limited to, surface water and groundwater quality, sediment quality, benthic invertebrate community monitoring, fish population studies and air quality monitoring. In addition, the operation has been conducting extensive baseline environmental studies in the area of the proposed new greenfield TSF at Lac des Iles. These include archaeological and cultural, hydrology and hydrogeology, terrestrial (wetlands, habitats and species at risk surveys), fish and fish habitat, and surface water, sediment and benthos quality surveys.

## F11 Impacts, risks and opportunities

F-MM11.1/F-CO11.1

**(F-MM11.1/F-CO11.1) Have any of your projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity?**

	Any projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity?	Comment
Row 1	No	<p>Although mining in general has the potential to cause significant adverse impacts, considering the type of mining Implats is involved in (PGM), and the general locations of our mining operations, our impacts do not align with the stated definition for significant adverse impacts to biodiversity.</p> <p>Biodiversity is intricately connected to the provision of vital ecosystem services, which are important for mining, exploration, and refining operations if not managed with utmost responsibility and effectiveness. These activities can give rise to various adverse outcomes, such as reductions in water quality and quantity, loss of endangered and protected species, and the fragmentation of habitats. The ramifications of these risks extend beyond ecological concerns, as they can undermine our social license to operate and have detrimental effects on our stakeholder reputation.</p> <p>Consequently, it is imperative that Implats prioritise comprehensive biodiversity management strategies to mitigate and minimise adverse impacts, to ensure the long-term sustainability of both our operations and surrounding ecosystems.</p>

F-MM11.2/F-CO11.2

**(F-MM11.2/F-CO11.2) Have you identified any biodiversity risks with the potential to have a substantive financial or strategic impact on your business?**

No

F-MM11.3/F-CO11.3

**(F-MM11.3/F-CO11.3) Have you identified any biodiversity-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

F-MM11.3a/F-CO11.3a

**(F-MM11.3a/F-CO11.3a) For your disclosed mining projects, provide details of the identified opportunities with the potential to have a substantive financial or strategic impact on your business.**

**Type of opportunity**

Resilience

**Primary biodiversity-related opportunity**

Improved climate change adaptation

**Where does the opportunity occur?**

Selected mines, business units or geographies only

**Mining project ID**

Project 4

**Estimated timeframe for realization**

4-6 years

**Company specific description & strategy to realize opportunity**

The Implats operation mine lease area includes a 276ha section of land within the Ngezi Recreational Park's boundary. Our rehabilitation and mine closure activities comply with the conditions outlined by the Ministry of Environment in the lease agreement regarding the protection and restoration of biodiversity in the lease area.

The operation's main control measure against deforestation is the land and vegetation clearance permitting system administered by the Ministry of Environment rehabilitation procedure. Vegetation loss is compensated for through offset initiatives where trees must be replaced on a 1:1 basis as a minimum. Measures and practices in place to mitigate deforestation include collecting seeds of important plant species ahead of planned projects, revegetation initiatives, conducting awareness training sessions for employees and contractors and participating in and supporting national tree-planting programmes.

**Type of opportunity**

Reputational and markets

**Primary biodiversity-related opportunity**

Maintaining a social licence to operate

**Where does the opportunity occur?**

Selected mines, business units or geographies only

**Mining project ID**

Project 1

**Estimated timeframe for realization**

4-6 years

**Company specific description & strategy to realize opportunity**

Impala Rustenburg supports regional and national conservation programmes and, since 2016, has been a proud sponsor of a 5 300ha nature reserve on the northern slopes of the Magaliesberg, working in collaboration with the North West Parks and Tourism Board. The reserve is home to a wide range of species of flora, mammals and



birdlife and is designated as a protected UNESCO Ramsar site.

Impala Rustenburg continues to carry out summer and winter bird surveys, which record an abundance of species across the mining footprint. The Rockwall Dam and the pool on top of the TSF provide important habitats for common aquatic species, as well as for those of regional conservation importance, and play an important role in conserving various species of wildlife.

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**Type of opportunity**

Reputational and markets

**Primary biodiversity-related opportunity**

Maintaining a social licence to operate

**Where does the opportunity occur?**

Selected mines, business units or geographies only

**Mining project ID**

Project 3

**Estimated timeframe for realization**

4-6 years

**Company specific description & strategy to realize opportunity**

Impala Springs operations are near the Blesbokspruit, a designated Ramsar Convention Wetlands of International Importance. Although our operation does not have any direct impact on the wetlands, it continues to partner in environmental education and conservation initiatives in the area.

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**Type of opportunity**

Reputational and markets

**Primary biodiversity-related opportunity**

Maintaining a social licence to operate

**Where does the opportunity occur?**

Selected mines, business units or geographies only

**Mining project ID**

Project 4

**Estimated timeframe for realization**

4-6 years

**Company specific description & strategy to realize opportunity**

Zimplats continues to explore ecotourism as an alternative rehabilitation model for the mine's open pit areas.

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**Type of opportunity**

Reputational and markets

**Primary biodiversity-related opportunity**

Improved community relations

**Where does the opportunity occur?**

Selected mines, business units or geographies only

**Mining project ID**

Project 1

**Estimated timeframe for realization**

>6 years

**Company specific description & strategy to realize opportunity**

Impala Rustenburg runs community environmental education projects on a continual basis, with a different theme quarterly. The most recent of these focused on water usage and on Arbor Week, which South Africa celebrates annually during the first week of September, calling on South Africans to plant indigenous trees as a practical and symbolic gesture of sustainable environmental management. In support of this, Impala Rustenburg celebrated the whole of September as Arbor Month and introduced various tree planting projects and initiatives across our operations and host communities. Most noteworthy was the processing team that planted approximately 500 indigenous trees along the main access roads leading into the Rustenburg operation. The Stakeholder Engagement Department also identified various schools in our local communities to whom Impala Rustenburg donated fruit trees and created awareness through the distribution of posters and engagements with the scholars.

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**Type of opportunity**

Reputational and markets

**Primary biodiversity-related opportunity**

Improved community relations

**Where does the opportunity occur?**

Company-wide

**Mining project ID**

<Not Applicable>

**Estimated timeframe for realization**

4-6 years

**Company specific description & strategy to realize opportunity**

We prioritize continuous engagement with landowners and land users to ensure that the final land use aligns with their expectations. This alignment is achieved through various engagement channels and forums, and the outcomes are documented as opportunities in our annual closure assessment and liability update. In line with the new Financial Provision Regulations under the National Environmental Management Act (NEMA), we proactively assess the social aspects of mine closure and incorporate them into our closure plans, demonstrating our commitment to responsible and inclusive practices throughout the mining lifecycle

**Type of opportunity**

Resilience

**Primary biodiversity-related opportunity**

Improved climate change adaptation

**Where does the opportunity occur?**

Selected mines, business units or geographies only

**Mining project ID**

Project 2

**Estimated timeframe for realization**

&gt;6 years

**Company specific description & strategy to realize opportunity**

The establishment of ecological offsets and the implementation of greening projects that include planting of indigenous trees along the roads, rehabilitated areas and within the host communities will improve regional climate adaptation.

## F12 Governance

## F-MM12.1/F-CO12.1

**(F-MM12.1/F-CO12.1) Is there board-level oversight of biodiversity-related issues within your organization?**

Yes

## F-MM12.1a/F-CO12.1a

**(F-MM12.1a/F-CO12.1a) Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for biodiversity-related issues.**

Position of individual	Please explain
Board-level committee	Implats' Board distributes duties and mandates to subcommittees, to ensure adequate governance and expertise on all key issues. The health, safety and environment Committee (HSECom) is responsible for governance, monitoring and strategic planning of health, safety, environmental and other risks faced by Implats (including biodiversity-related issues), to ensure harmless operations. Implats Canada aligned with the Group HSE reporting protocols and management methods. Implats identified biodiversity as a concern impacting all spheres of HSE portfolio and therefore integrated their approach to include biodiversity within the Committee. Implats recently appointed a Group Executive: Sustainability, who oversees biodiversity-related actions. The HSECom monitors and reviews the risk profile and effectiveness of management activities. The Executive Management Team (Exco) supports the board's HSECom, STRCom and audit and risk committee and the HSECom develops strategic business and capital allocation decisions with information from quarterly Exco meetings, and other operational and financial meetings. The HSECom assesses strategic implementation, internal policies, standards and risk management procedures for adequacy and appropriateness, and revises risk management strategies, ensuring all HSE-related impacts can be accounted for and managed accordingly. The Committee is also responsible for monitoring (quarterly) Implats' strategy implementation and risk management and investigates and reviews all major incidents for trouble-shooting and improved management methods. In 2022 the HSECom approved the Group's Biodiversity, Rehabilitation and Closure Policy Statement, which includes commitments and targets for the protection of the environment, including biodiversity, land management and responsible post-closure management.
Chief Executive Officer (CEO)	The CEO is responsible for leading the executive team in delivering against our corporate strategy, including against goals of mitigating biodiversity impacts, building resilience and ensuring biodiversity-related disclosures are made. The CEO also signs-off the related CDP submissions.
Chief Sustainability Officer (CSO)	Also referred to as the Sustainable Development Executive, who develops biodiversity-related frameworks, strategies and monitors implementation. Accountable for Group's overall sustainability strategy, including functional strategies such as the environmental strategy and its material thematic elements, including biodiversity.
Other, please specify (Executive Committee)	Roles include biodiversity-related risk management. Supports the CEO's biodiversity-related risk management efforts and the strategic integration of biodiversity-related programmes into various business line functions.
Other, please specify (Group Head: Environment)	Responsible for the execution of the environmental strategy. Reports to Group Executive: Sustainable Development and is responsible for driving strategic initiatives to ensure compliance to environmental regulations, facilitates the development and implementation of Group environmental strategy and integration of biodiversity-related mitigation actions into the overall environmental portfolio, including water, biodiversity and integrated asset closure planning.
Other, please specify (Business Unit Executives)	Responsible for developing and implementing operational plans. Business unit executives are responsible for the implementation of policies relating to biodiversity under the guidance of the corporate team. These executives are supported at operations through the environmental specialists, to implement plans and monitor performance.

## F-MM12.1b/F-CO12.1b

(F-MM12.1b/F-CO12.1b) Provide further details on the board's oversight of biodiversity-related issues.

	Frequency that biodiversity-related issues are a scheduled agenda item	Governance mechanisms into which biodiversity-related issues are integrated	Please explain
Row 1	Scheduled - all meetings	Monitoring implementation and performance Reviewing and guiding annual budgets Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy Reviewing and guiding major plans of action Reviewing and guiding strategy Setting performance objectives	<p>Implats' board delegated some of its authority to sub-committees. Each committee oversees and monitor key strategic matters and reports back to the board on their activities quarterly. Committee terms of reference are reviewed and approved annually, to ensure they are up to date. The board moved oversight of the group risk management framework to the audit and risk (ARCom) committee. At executive level, sustainable development is the responsibility of the executive management team (Exco). A dedicated Group executive is responsible for developing ESG strategies and reviewing performance of the Group's non-financial indicators. The Exco supports the board's Health, Safety and Environment committee (HSECom), the Social, Transformation and Remuneration (STRCom) committee and the ARCom. The ARCom is responsible for reviewing material issues reported to stakeholders, and considers appointment, scope and conclusion of independent assurance providers for those reports. The ARCom reviewed material matters for inclusion in the ESG report, which is jointly recommended to the board by the HSECom and STRCom.</p> <p>Strategies and the board are guided by the King IV Code principles on Corporate Governance (King IV), the Companies Act, the JSE Listings Requirements and applicable laws, standards and codes. The board reviews biodiversity and closure targets and considerations and is responsible for Implats' risk identification and management. The HSECom is responsible for monitoring implementation of the HSE strategy to deliver safe production without causing harm to stakeholders or the environment. The ARCom oversees implementation of the Group's risk management framework, which is used to identify its top strategic risks, (including biodiversity risks), to ensure harmless operations. Groupwide monitoring and reporting of risks and risk mitigation action plans are derived quarterly. Risks and opportunities regarding biodiversity are reviewed by the HSECom, where material risks that are identified are reported to the board. Furthermore, the Strategy and Investment Committee (SIC) approves capital allocation to address biodiversity and closure concern in line with business strategy. Over the next five years we plan to spend R45 million on initiatives to align to our 2030 biodiversity goals.</p>

F-MM12.2/F-CO12.2

**(F-MM12.2/F-CO12.2) Provide the highest management-level position(s) or committee(s) with responsibility for biodiversity-related issues (do not include the names of individuals)**

**Name of the position(s) and/or committee(s)**

Chief Executive Officer (CEO)

**Responsibility**

Both assessing and managing biodiversity-related risks and opportunities

**Frequency of reporting to the board on biodiversity-related issues**

Quarterly

**Please explain**

The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management.

The CEO is responsible for leading the executive team in delivering against our corporate strategy, including against goals of mitigating biodiversity impacts, building resilience and ensuring biodiversity-related disclosures are made. The CEO also signs-off the related CDP submissions.

Biodiversity-related risks and opportunities are reviewed quarterly using quarterly reports.

**Name of the position(s) and/or committee(s)**

Other, please specify (Executive Committee)

**Responsibility**

Both assessing and managing biodiversity-related risks and opportunities

**Frequency of reporting to the board on biodiversity-related issues**

Quarterly

**Please explain**

Roles include biodiversity-related risk management. Supports the CEO's biodiversity-related risk management efforts and the strategic integration of biodiversity-related programmes into various business line functions.

**Name of the position(s) and/or committee(s)**

Environmental, health and safety manager

**Responsibility**

Both assessing and managing biodiversity-related risks and opportunities

**Frequency of reporting to the board on biodiversity-related issues**

Quarterly

**Please explain**

Also known as the Group head of Environment. Responsible for the execution of the environmental strategy. Reports to Group Executive: Sustainable Development and is responsible for driving strategic initiatives to ensure compliance to environmental regulations, facilitates the development and implementation of Group environmental strategy and integration of biodiversity-related mitigation actions into the overall environmental portfolio, including water, biodiversity and integrated asset closure planning.

**Name of the position(s) and/or committee(s)**

Other, please specify (Business Units Executive)

**Responsibility**

Both assessing and managing biodiversity-related risks and opportunities

**Frequency of reporting to the board on biodiversity-related issues**

Quarterly

**Please explain**

Responsible for developing and implementing operational plans. Business unit executives are responsible for the implementation of policies relating to biodiversity under the guidance of the corporate team. These executives are supported at operations through the environmental specialists, to implement plans and monitor performance

**F-MM12.3/F-CO12.3**

**(F-MM12.3/F-CO12.3) Do you provide incentives to C-suite employees or board members for the management of biodiversity-related issues?**

	Are there incentives to C-suite employees or board members?	Comment
Row 1	Yes	<p>There has been a general shift towards including environmental, social and governance (ESG) measures into variable pay structures. The Implats Remuneration Committee understands the importance of incorporating these measures but believes this needs to be properly researched and understood to ensure that these measures are robust and drive the correct behaviour. As a first step, the committee has approved the inclusion of Implats performance on the Dow Jones Sustainability Index (DJSI) as an STI parameter. The inclusion of the DJSI is an acknowledgement of the importance of sustainability to the Group strategy.</p> <p>The DJSI provides benchmarks for investors who recognise that sustainable business practices are critical to generating long-term value. The indices track the performance of companies in terms of economic, environmental, governance and social criteria across 61 different industries. We believe that our participation in the DJSI will lead to a significant improvement in our corporate sustainability practices. Rather than focusing on one specific ESG outcome, the DJSI will allow us to assess how we perform against multiple criteria, which include corporate governance; risk and crisis management; climate strategy; biodiversity, mineral waste management; social impacts on communities and code of business conduct. This assessment will also allow us to refine our ESG strategy to ensure alignment with the strategic direction of the Company.</p> <p>The newly introduced DJSI assessment also resulted in the achievement of stretch but only carries a 10% weighting so the impact on the overall score is limited.</p>

**(F-MM12.3a/F-CO12.3a) What incentives are provided to C-Suite employees or board members for the management of biodiversity-related issues (do not include the names of individuals)?**

	Role entitled to incentive	Indicator for incentivized performance	Please explain
Monetary reward	Board/Executive board Corporate executive team Chief Executive Officer (CEO) Other, please specify (Business Unit Executives and General Managers )	Other, please specify (Dow Jones Sustainability Index (DJSI) ESG Performance score)	As a first step, the committee has approved the inclusion of Implats performance on the Dow Jones Sustainability Index (DJSI) as an STI parameter. The inclusion of the DJSI is an acknowledgement of the importance of sustainability to the Group strategy. The DJSI provides benchmarks for investors who recognise that sustainable business practices are critical to generating long-term value. The indices track the performance of companies in terms of economic, environmental, governance and social criteria across 61 different industries. We believe that our participation in the DJSI will lead to a significant improvement in our corporate sustainability practices. Rather than focusing on one specific ESG outcome, the DJSI will allow us to assess how we perform against multiple criteria, which include corporate governance; risk and crisis management; climate strategy; biodiversity, mineral waste management; social impacts on communities and code of business conduct. This assessment will also allow us to refine our ESG strategy to ensure alignment with the strategic direction of the Company. The newly introduced DJSI assessment also resulted in the achievement of stretch but only carries a 10% weighting so the impact on the overall score is limited.
Non-monetary reward	Please select	Please select	

F-MM12.4/F-CO12.4

**(F-MM12.4/F-CO12.4) Does your organization have a policy that includes biodiversity-related issues?**

Yes, we have a documented biodiversity policy that is publicly available

F-MM12.4a/F-CO12.4a

**(F-MM12.4a/F-CO12.4a) Select the options that best describe the scope and content of your policy.**

	Format	Content	Please explain
Row 1	Stand-alone biodiversity policy	Recognition of the overall importance of natural habitats Recognition of potential business impact on natural habitats Commitments beyond regulatory compliance Commitment to transparency Commitment to stakeholder awareness and capacity-building Commitment to protect rights and livelihoods of local communities	Implats is a leading producer of platinum group metals (PGMs). The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Implats is committed to: <ul style="list-style-type: none"> <li>• Implementing the mitigation hierarchy in managing risks and minimizing negative impacts to the biodiversity</li> <li>• Engaging external stakeholders to develop tools and guidance to integrate biodiversity management with land use planning</li> <li>• Neither exploring nor developing new mines in World Heritage sites</li> <li>• Respecting legally designated protected areas</li> <li>• Designing and operating any new operations or changes to existing operations to be compatible with the value for which such areas were designated</li> <li>• Working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets</li> <li>• Preparing site-specific biodiversity action plans in line with regulatory, legal, and other requirements</li> <li>• Raising awareness and promoting responsibility among employees, contractors and those entering our operations to the importance of biodiversity protection and management</li> <li>• Concurrently rehabilitating all impacted land, aiming to restore land to a beneficial state developed in consultation with all relevant stakeholders</li> <li>• Integrating closure objectives into the planning, design and operations of projects and mines</li> <li>• Developing closure outcomes in consultation with all relevant stakeholders that minimize adverse impacts and maximize post-closure stakeholder value</li> <li>• Implementing measures at closure to afford economic opportunities for stakeholders and address closure-related environmental and social aspects</li> <li>• Providing sufficient financial resources to enable agreed closure and post-closure commitments</li> <li>• Continuously identify, review and update risks, including climate-related, impacting on our biodiversity, rehabilitation, and post-closure management effort</li> <li>• Publicly disclosing progress regarding our biodiversity, rehabilitation, and closure management performance</li> </ul>

F-MM12.5/F-CO12.5

**(F-MM12.5/F-CO12.5) Has your organization made any public commitment(s) to reduce or avoid impacts on biodiversity?**

Yes

F-MM12.5a/F-CO12.5a

**(F-MM12.5a/F-CO12.5a) Provide details on your public commitment(s), including the description of specific criteria, coverage, and timeframe.**

**Commitment**

Adoption of the mitigation hierarchy approach

**Coverage**

Company-wide

**% of total production covered by commitment**

100%

**Commitment timeframe**

No specified timeframe

**Please explain**

Implats is a leading producer of platinum group metals (PGMs). The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem.

Our overall commitments are:

- Implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems
- Neither explore nor develop new mines in World Heritage sites
- Respect legally designated protected areas
- Design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated
- Working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets

These commitments are outlined in our Biodiversity, Rehabilitation and Closure Policy statement (published in February 2022).

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#### **Commitment**

Net Positive Impact

#### **Coverage**

Company-wide

#### **% of total production covered by commitment**

100%

#### **Commitment timeframe**

No specified timeframe

#### **Please explain**

Implats is a leading producer of platinum group metals (PGMs). The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem.

Our overall commitments are:

- Implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems
- Neither explore nor develop new mines in World Heritage sites
- Respect legally designated protected areas
- Design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated
- Working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets

These commitments are outlined in our Biodiversity, Rehabilitation and Closure Policy statement (published in February 2022).

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#### **Commitment**

Not to explore or develop mines in World Heritage sites

#### **Coverage**

Company-wide

#### **% of total production covered by commitment**

100%

#### **Commitment timeframe**

No specified timeframe

#### **Please explain**

Implats is a leading producer of platinum group metals (PGMs). The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem.

Our overall commitments are:

- Implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems
- Neither explore nor develop new mines in World Heritage sites
- Respect legally designated protected areas
- Design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated
- Working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets

These commitments are outlined in our Biodiversity, Rehabilitation and Closure Policy statement (published in February 2022).

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#### **Commitment**

Not to explore or develop mines in legally designated protected areas

#### **Coverage**

Company-wide

#### **% of total production covered by commitment**

100%

#### **Commitment timeframe**

No specified timeframe

#### **Please explain**

Implats is a leading producer of platinum group metals (PGMs). The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem.

Our overall commitments are:

- Implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems
- Neither explore nor develop new mines in World Heritage sites
- Respect legally designated protected areas
- Design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated
- Working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets

These commitments are outlined in our Biodiversity, Rehabilitation and Closure Policy statement (published in February 2022).

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#### **Commitment**

Respect legally designated protected areas

**Coverage**

Company-wide

**% of total production covered by commitment**

100%

**Commitment timeframe**

No specified timeframe

**Please explain**

Implats is a leading producer of platinum group metals (PGMs). The Group plans and executes its operations in a way that strives to maximise the positive impacts PGMs have on the environment and minimise or eliminate any negative impacts. Implats is committed to the protection of the environment, including biodiversity, land management and responsible post-closure management. Our operations implement initiatives to reduce the loss of biodiversity, habitats and ecosystem.

Our overall commitments are:

- Implement the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems
- Neither explore nor develop new mines in World Heritage sites
- Respect legally designated protected areas
- Design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated
- Working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets

These commitments are outlined in our Biodiversity, Rehabilitation and Closure Policy statement (published in February 2022).

**F13 Business strategy**

**F-MM13.1/F-CO13.1**

**(F-MM13.1/F-CO13.1) Are biodiversity issues integrated into any aspects of your long-term strategic business plan, and if so how?**

	Are biodiversity-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, biodiversity-related issues are integrated	5-10	Our operations continue to implement biodiversity monitoring programmes, and these are used to ensure our operations are aligned with long-term business objectives, strategies and targets. All site-specific biodiversity action and management plans are actioned to be updated by 2025.
Strategy for long-term objectives	Yes, biodiversity-related issues are integrated	5-10	<p>In South Africa, we monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits.</p> <p>Our biodiversity target for 2030 is to ensure 100% alignment against the Group biodiversity guideline as assessed by a third party. This will be achieved through aligning with our overall biodiversity commitments that include: implementing the mitigation hierarchy to manage risks and impacts to biodiversity and ecosystems; neither explore nor develop new mines in World Heritage sites; respect legally designated protected areas; and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated.</p> <p>Comprehensive environmental monitoring is carried out by Impala Canada in accordance with federal and provincial regulatory requirements and with its relevant permits. This includes, but is not limited to, surface water and groundwater quality, sediment quality, benthic invertebrate community monitoring, fish population studies and air quality monitoring. The operation oversees water sample collection over a 1 650km2 area and has 12 cameras monitoring wildlife around the mine as part of its comprehensive biodiversity study.</p>
Financial planning	Yes, biodiversity-related issues are integrated	5-10	Over the next five years we plan to spend R45 million on initiatives to align to our 2030 biodiversity goals. Impala Canada's proposed Greenfield TMF would impinge on a natural water body that contains small fish. The federal Fisheries Act prohibits the deposition of a deleterious substance in waters frequented by fish unless authorized by regulations. The Metal and Diamond Mining Effluent Regulations (MDMER) authorize deposits of mine waste into such water bodies, provided they are registered and set out in Schedule 2 of the MDMER. An amendment to the MDMER is therefore required to add waterbodies on Schedule 2, and this in turn requires Impala Canada to develop an Assessment of Alternatives (AA) report, a Fish Habitat Compensation Plan (FHCP), and participate in public and Indigenous consultations on the potential amendment to Schedule 2. Appropriate capital has been budgeted in the latest BP for the construction and implementation of the FHCP, and financial assurance, in the form of surety bonds, will be provided to the federal agencies to ensure the successful implementation of the plan.

**F14 Implementation**

**F-MM14.1/F-CO14.1**

**(F-MM14.1/F-CO14.1) Have you specified any measurable and time-bound targets related to your commitment(s) to reduce or avoid impacts on biodiversity?**

Yes

**F-MM14.1a/F-CO14.1a**

**(F-MM14.1a/F-CO14.1a) Provide details of your target(s) related to your commitment(s) to reduce or avoid impacts on biodiversity, and progress made.**

**Target reference number**

Target 1

**Target label**

Develop Group biodiversity guideline

**Base year**

2022

**Target year**

2023

**% of target achieved**

1-10%

**Please explain**

The development of our Group Biodiversity Guideline will be useful for Implats, as it will provide a unified approach to managing biodiversity across our operations and projects, ensuring consistency and accountability. The guideline will aim to achieve effective biodiversity conservation and management practices, minimise adverse impacts on biodiversity, and enhance positive contributions to biodiversity within our operations.

To achieve the target of developing the group biodiversity guideline, Implats will begin by assessing the commitments that have been made in the rehabilitation, mine closure and biodiversity policy. The main aspects of the guideline will focus on no exploration and development of mines in World Heritage sites or legally designated protected areas and the establishment of the mitigation hierarchy for the management of risks and impacts to biodiversity and ecosystems.

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**Target reference number**

Target 2

**Target label**

Update site-specific biodiversity action and management plan and implement a biodiversity monitoring programme

**Base year**

2022

**Target year**

2025

**% of target achieved**

21-30%

**Please explain**

We already monitor and measure performance against a formal biodiversity management plan, which is informed by the Mining and Biodiversity Guideline developed by the South African National Biodiversity Institute. The plan includes terrestrial and aquatic biodiversity monitoring programmes. Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (scientists registered with the South African Council for Natural Scientific Professionals). The programmes are not only designed to monitor and provide reactive commentary, but also to provide recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, which is performed annually at all rehabilitated opencast pits.

These plans are to be updated and implemented by 2025.

To achieve the target of updating site-specific biodiversity action and management plans and implementing a biodiversity monitoring program, Implats will begin by conducting comprehensive biodiversity assessments at each site to identify key conservation priorities and potential risks. Based on these assessments, we will develop tailored action plans that incorporate specific measures for biodiversity conservation and management. The implementation of a robust biodiversity monitoring program will allow Implats to track the effectiveness of their conservation efforts, identify emerging risks, and make informed decisions to continually improve their biodiversity performance.

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**Target reference number**

Please select

**Target label**

Ensure 100% alignment against the Group biodiversity guideline as assessed by a third party

**Base year**

2022

**Target year**

2030

**% of target achieved**

0%

**Please explain**

The target of ensuring 100% alignment against the Group biodiversity guideline by 2030 has been chosen to demonstrate Implats' strong commitment to biodiversity conservation and sustainable practices. It aligns with Implats' commitments to implement the mitigation hierarchy, avoid mining in World Heritage sites, respect protected areas, and operate in a manner compatible with the designated values of such areas.

To meet this target, Implats is planning to undertake several actions. Firstly, we will actively engage with the development and implementation of the group biodiversity guideline to ensure its effectiveness and relevance. We will establish clear criteria and indicators for assessing alignment and collaborate with a third-party assessment body to ensure an independent evaluation. Implats will also proactively monitor and track their progress, identifying areas where improvements can be made, and implementing corrective measures to achieve full alignment with the guideline by 2030. Through these efforts, Implats aims to demonstrate their leadership in biodiversity conservation and contribute to the long-term sustainability of their operations and the surrounding ecosystems

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**F-MM14.2/F-CO14.2**



**(F-MM14.2/F-CO14.2) Provide details on mining projects that are required to produce Biodiversity Action Plans.**

**Row 1**

**Number of mining projects required to produce a biodiversity action plan**

5

**% of mining projects required to produce a biodiversity action plan that have one in place**

100

**Format**

Part of general Environmental Management System

**Frequency biodiversity action plans are reviewed**

Regularly

**Please explain**

Our annual biodiversity monitoring programmes are undertaken by external biodiversity specialists (registered with the SA Council for Natural Scientific Professionals). The programmes are designed to monitor, provide reactive commentary and recommendations for remediating poor performing areas. This monitoring is done via landscape function analysis, at all rehabilitated opencast pits. Impala Rustenburg's flora and fauna has benefitted enormously from two consecutive years of above average rainfall. The fertile clay soils in the lease area have shown a substantial increase in overall vegetation cover. This has buffered these sensitive ecosystems against sustained heavy grazing pressure from domestic livestock. At Zimplats, biodiversity management plans derived from the EIAs continue to form the basis of its actions to mitigate any negative impacts on biodiversity. This financial year Zimplats cleared 32.87ha of AIS is committed to raising awareness among employees, contractors and the community on the importance of biodiversity protection and management. Impala Rustenburg continues to carry out summer and winter bird surveys, The Rockwall Dam and the pool on top of the TSF provide important habitats for common aquatic species, as well as for those of regional conservation importance, and play an important role in conserving various species of wildlife. All fieldwork at Rustenburg for the winter assessment was completed during the reporting period. Although the preliminary data seems to be fairly consistent with last year's exercise, the excessive veld fires during the winter months impacted the overall biodiversity within the larger regional setting. Education and awareness training is planned for communities in the coming year to encourage environmental conservation. The yellow-billed stork (endangered), the caspian tern (vulnerable), and the greater and lesser flamingo (near threatened), are seen within lease area, Impala Canada conducts monitoring in accordance with federal and provincial regulatory requirements. This includes, but is not limited to, surface water and groundwater quality, sediment quality, benthic invertebrate community monitoring, and fish population studies. The operation oversees water sample collection over a 1 650km2 area and has 12 cameras monitoring wildlife around the mine as part of its comprehensive biodiversity study.

**F-MM14.3/F-CO14.3**

**(F-MM14.3/F-CO14.3) Has your organization adopted avoidance and/or minimization as strategies to prevent or mitigate significant adverse impacts on biodiversity?**

Yes

**F-MM14.3a/F-CO14.3a**

**(F-MM14.3a/F-CO14.3a) Provide relevant company-specific examples of your implementation of avoidance and minimization actions to manage adverse impacts on biodiversity.**

**Mining project ID**

Project 1

**Approach**

Avoidance

**Type of measure**

Site selection

**Description**

Implats incorporates avoidance and minimization considerations within the Environmental Impact Assessment (EIA) process, which is conducted for all our respective sites. During the EIA process, biodiversity risks and impacts are evaluated thoroughly prior to project design and construction, aligning with legal requirements. While Implats plans to go beyond legislative requirements in the future, our current approach is grounded in adherence to existing regulations. The recently released Biodiversity, Rehabilitation, and Closure Policy Statement, unveiled in February 2022, underscores our commitment to achieving a net positive impact on biodiversity for new projects through a comprehensive strategy encompassing avoidance, mitigation, and offsets.

During the Environmental Impact Assessment (EIA) process for a new Tailings storage facility (TSF) at our Rustenburg operations, we identified that our planned footprint intersected with a bullfrog breeding area. Recognizing the importance of protecting this habitat, we proactively took action to relocate the TSF footprint, ensuring that it no longer posed any adverse impacts on the bullfrog breeding area. This demonstrates our commitment to responsible environmental management and our willingness to adjust our plans to mitigate potential impacts on biodiversity.

During the decommissioning of 8 Shaft at Impala Rustenburg, four Barn Owlets were found in the ore box. To ensure their safety and well-being, we partnered with the Owl Rescue Centre, a non-profit organization, who expertly retrieved the owlets and transferred them to their rehabilitation facility. As part of our commitment to biodiversity management, we installed 16 owl houses strategically throughout our operational area to provide alternative nesting spaces and discourage owls from nesting in mining infrastructure. This initiative showcases our dedication to both avoidance and minimisation measures in protecting and preserving biodiversity.

**Mining project ID**

Project 2

**Approach**

Avoidance

**Type of measure**

Site selection

**Description**

Implats incorporates avoidance and minimization considerations within the Environmental Impact Assessment (EIA) process, which is conducted for all our respective sites. During the EIA process, biodiversity risks and impacts are evaluated thoroughly prior to project design and construction, aligning with legal requirements. While Implats plans to go beyond legislative requirements in the future, our current approach is grounded in adherence to existing regulations. The recently released Biodiversity, Rehabilitation, and Closure Policy Statement, unveiled in February 2022, underscores our commitment to achieving a net positive impact on biodiversity for new projects through a comprehensive strategy encompassing avoidance, mitigation, and offsets.

During the Environmental Impact Assessment (EIA) process for the establishment of new infrastructure as well as the upgrading of existing support services and infrastructure at the Marula operations, seven alternative sites were considered for the construction of the Tailings Dam 2 site. Six of the seven sites were identified as not suitable. Some of the main reasons for the six sites were considered not suitable were that, during the field investigations, it was found that these areas contained several red data plant species and sites of archaeological significance. In addition, the sites covered a major tributary of the Moopetsi river and would have required extensive river diversion measures. These aspects combined led to the conclusion that these sites would not be suitable for the development of a tailings dam. This demonstrates our commitment to responsible environmental management and to both avoidance and minimisation measures in protecting and preserving biodiversity.

**Mining project ID**

Project 4

**Approach**

Avoidance

**Type of measure**

Site selection

**Description**

Implats incorporates avoidance and minimization considerations within the Environmental Impact Assessment (EIA) process, which is conducted for all our respective sites. During the EIA process, biodiversity risks and impacts are evaluated thoroughly prior to project design and construction, aligning with legal requirements. While Implats plans to go beyond legislative requirements in the future, our current approach is grounded in adherence to existing regulations. The recently released Biodiversity, Rehabilitation, and Closure Policy Statement, unveiled in February 2022, underscores our commitment to achieving a net positive impact on biodiversity for new projects through a comprehensive strategy encompassing avoidance, mitigation, and offsets.

A total of 36 snakes were captured and relocated from Zimplats working sites in FY2022

**Mining project ID**

Project 5

**Approach**

Avoidance

**Type of measure**

Site selection

**Description**

Implats incorporates avoidance and minimization considerations within the Environmental Impact Assessment (EIA) process, which is conducted for all our respective sites. During the EIA process, biodiversity risks and impacts are evaluated thoroughly prior to project design and construction, aligning with legal requirements. While Implats plans to go beyond legislative requirements in the future, our current approach is grounded in adherence to existing regulations. The recently released Biodiversity, Rehabilitation, and Closure Policy Statement, unveiled in February 2022, underscores our commitment to achieving a net positive impact on biodiversity for new projects through a comprehensive strategy encompassing avoidance, mitigation, and offsets.

Impala Canada conducted a thorough examination of various options to meet required tailings storage demands; Based primarily on environmental and construction suitability factors, Impala has selected the Greenfields TMF as the primary option; a number of key environmental and engineering studies have been completed as part of the new proposed TMF, including a sediment and benthic characterization, a fisheries assessment and a Species at Risk (SAR) study, all within the project area. Based on the information gathered, the location was chosen to minimize impacts to biodiversity and other natural resources, and the design was adjusted to physical constraints, including the avoidance of impingement on an adjacent watershed. The approach was based on careful examination of baseline conditions within the project area, and iterative approaches to the design of the new facility to minimize or avoid potential impacts.

**F-MM14.4/F-CO14.4**

**(F-MM14.4/F-CO14.4) Have significant impacts on biodiversity been mitigated through restoration?**

	Have significant impacts on biodiversity been mitigated through restoration?	Comment
Row 1	No	The potential impacts reported in our 2022 ESG Report (veld fires and overgrazing by community members on our license area) are immaterial or negligible. These impacts are not deemed significant and therefore none are reported in more detail.

**F-MM14.5/F-CO14.5**

**(F-MM14.5/F-CO14.5) Have significant residual impacts of your projects been compensated through biodiversity offsets?**

	Have residual impacts been compensated through biodiversity offsets?	Comment
Row 1	No	The Implats Biodiversity, Rehabilitation and Closure Policy Statement outlines a commitment to working towards a net positive impact on biodiversity for new projects, through avoidance, mitigation and offsets. No biodiversity offsets have been used as no new projects have been added to our portfolio.

**F-MM14.6/F-CO14.6**

(F-MM14.6/F-CO14.6) Is your organization implementing or supporting additional conservation actions?

	Implementing or supporting additional conservation actions?	Comment
Row 1	Yes	Impala Rustenburg and Impala Springs continue to partner in environmental education and conservation initiatives in their respective operational areas.

F-MM14.6a/F-CO14.6a

(F-MM14.6a/F-CO14.6a) Provide details on the main additional conservation actions you are implementing or supporting.

**Project title**

Project 1

**Project theme**

Protected areas

**Country/Area**

South Africa

**Location**

Outside area of influence of mining project

**Primary motivation**

Voluntary

**Timeframe**

Defined

**Start year**

2016

**End year**

2039

**Description of project**

As reported last year, Impala Rustenburg supports regional and national conservation programmes and, since 2016, has been a proud sponsor of a 5 300ha nature reserve on the northern slopes of the Magaliesberg, working in collaboration with the North West Parks and Tourism Board. The reserve is home to a wide range of species of flora, mammals and birdlife and is designated as a protected UNESCO Ramsar site.

**Description of outcome to date**

The investment into the nature reserve has increased the number of visitors to the Park. Improved amenities improve the experience and therefore attract more visitors.

**Project title**

Project 3

**Project theme**

Protected areas

**Country/Area**

South Africa

**Location**

Outside area of influence of mining project

**Primary motivation**

Voluntary

**Timeframe**

Undefined

**Start year**

2000

**End year**

<Not Applicable>

**Description of project**

Impala Springs operations are near the Blesbokspruit, a designated Ramsar Convention Wetlands of International Importance. Although our operation does not have any direct impact on the wetlands, it continues to partner in environmental education and conservation initiatives in the area.

**Description of outcome to date**

The Refineries donate money to the Grootvally Blesbokspruit Trust, and the Refineries Safety and Environmental Manager is the Trustee on behalf of Refineries. The Trust in collaboration with the Ekurhuleni Metro Environmental Department manages the environmental education programme and this involves the transport of primary school learners to the site and providing them with an interactive programme involving wetlands and environmental conservation

F-MM14.7/F-CO14.7

**(F-MM14.7/F-CO14.7) Do your mining projects have closure plans in place?**

	Are there closure plans in place?	Comment
Row 1	Yes	A mine has social and environmental impacts long after the end of its operational phase. Through integrated closure planning and concurrent rehabilitation, we strive for our mines to leave a positive, healthy and sustainable legacy. Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Conducting concurrent rehabilitation ensures that we reduce the end-of-life closure liability. In line with our 2030 goal and interim targets, a Group rehabilitation, mine closure and biodiversity policy statement was approved. Each operation will develop and implement an integrated biodiversity, mine closure and rehabilitation plan to achieve our shorter-term targets and commitments

**F-MM14.7a/F-CO14.7a****(F-MM14.7a/F-CO14.7a) Please provide details on mines with closure plans.****Row 1****Percentage of mines with closure plans**

100

**Percentage of closure plans that take biodiversity aspects into consideration**

100

**Is there a financial provision for mine closure expenditure?**

Yes, for all mines

**Frequency closure plans are reviewed**

Regularly (all projects)

**Please explain**

All our mining operations have closure plans in place, which are reviewed annually. All mining operations will be rehabilitated back to grazing or wilderness and therefore biodiversity plays a critical part in the closure plans. The closure liabilities and applicable financial provisions are updated accordingly and audited by a third party. Closure-liability assessments are based on identified closure risks at each operation and developing a mitigation plan over the remaining life of operation. Responsibility for financial provisioning lies with the Group CFO and our HSE committee oversees our approach and performance in managing these impacts.

In South Africa, our assessment protocols and methodology align with the country's regulations relating to the financial provision for prospecting, exploration, mining or production operations. The revised National Environmental Management Act (NEMA) financial provision regulations were extended to June 2022, with an update published ahead of that in May, further extending the regulations to September 2023.

Zimplats conducts annual closure liability assessments aligned with the Group's assessment methodology and protocols, and the operation's closure liability estimates were reviewed by independent closure planning experts and updated this year.

Impala Canada has initiated a new closure plan to include the new tailings expansion. The updated closure plan and the associated increase to financial assurance are currently under review by regulatory agencies.

Implats holds a number of prospecting rights across the South African mining operations. Applications to close many of these at Impala Rustenburg and Afplats were submitted in line with regulatory requirements.

Closure of the Lac des Iles Mine site at the end of operations will be carried out in accordance with Ontario Regulation (O. Reg.) 240/00 of the Mining Act, The most recent changes to the Closure Plan were approved by the Ontario Ministry of Mines (MOM) in December 2019. The plan is a stand-alone document and constitutes the complete Lac des Iles Mine Closure Plan. Based on an updated cost analysis. Estimates for closure as described in the 2019 Closure Plan Amendment. A new Closure Plan Amendment is in progress it is our intention to adjust the financial assurance, Progressive rehabilitation of disturbed areas will be implemented

**F-MM14.8/F-CO14.8****(F-MM14.8/F-CO14.8) Can you disclose the area rehabilitated (in total and in the reporting year) for each of your mining projects?**

	Disclosing area rehabilitated (in total and in the reporting year)?	Comment
Row 1	Yes	We continue to look for alternative post-closure land uses that are aligned with our host communities' expectations and support economic opportunities after mining ceases. Effective rehabilitation is also a key regulatory, financial and reputational issue for the Group. As the technical aspects of rehabilitation are becoming more critical, landscape function analysis, which is aimed at measuring functionality and sustainability, is currently used as a monitoring tool at the rehabilitated opencast sites at the Rustenburg operation as well as the rehabilitated tailings side slopes at Marula. This monitoring will continue throughout 2023. All TSFs at our southern African operations have concurrent integrated rehabilitation plans that include revegetation, dust management and water management. Implats has rehabilitated approximately 290ha in total while 46.4ha were rehabilitated during the reporting year.

**F-MM14.8a/F-CO14.8a****(F-MM14.8a/F-CO14.8a) Provide details on the area rehabilitated (total/reporting year) for each of your mining projects, including post-mining land use.****Mining project ID**

Project 1

**Total area rehabilitated (hectares)**

108

**Area rehabilitated in the reporting year (hectares)**

11

**Describe post-mining land use**

Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Conducting concurrent rehabilitation ensures that we reduce the end-of-life closure liability.

In South Africa, our assessment protocols and methodology align with the country's regulations relating to the financial provision for prospecting, exploration, mining or production operations. As stated in our 2021 ESG report, the revised National Environmental Management Act (NEMA) financial provision regulations were extended to June 2022, with an update published ahead of that in May, further extending the regulations to September 2023.

The post-mining land use at Rustenburg will be grazing on the surface rights area.

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#### **Mining project ID**

Project 2

#### **Total area rehabilitated (hectares)**

43.6

#### **Area rehabilitated in the reporting year (hectares)**

23.6

#### **Describe post-mining land use**

Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Conducting concurrent rehabilitation ensures that we reduce the end-of-life closure liability.

In South Africa, our assessment protocols and methodology align with the country's regulations relating to the financial provision for prospecting, exploration, mining or production operations. As stated in our 2021 ESG report, the revised National Environmental Management Act (NEMA) financial provision regulations were extended to June 2022, with an update published ahead of that in May, further extending the regulations to September 2023.

The post-mining land use at Marula will be grazing and subsistence farming on the surface rights area. Free range grazing will occur at most outlying areas which have no or minimal mining-related disturbances (e.g. general surface areas and footprint areas where infrastructure or waste rock dumps will be removed).

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#### **Mining project ID**

Project 3

#### **Total area rehabilitated (hectares)**

0

#### **Area rehabilitated in the reporting year (hectares)**

0

#### **Describe post-mining land use**

Refineries is an established industrial site which was previously developed and occupied by East Geduld mine and therefore doesn't have concurrent rehab programmes as can be seen at the mining operations.

Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Conducting concurrent rehabilitation ensures that we reduce the end-of-life closure liability.

In South Africa, our assessment protocols and methodology align with the country's regulations relating to the financial provision for prospecting, exploration, mining or production operations. As stated in our 2021 ESG report, the revised National Environmental Management Act (NEMA) financial provision regulations were extended to June 2022, with an update published ahead of that in May, further extending the regulations to September 2023.

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#### **Mining project ID**

Project 4

#### **Total area rehabilitated (hectares)**

137

#### **Area rehabilitated in the reporting year (hectares)**

11.6

#### **Describe post-mining land use**

Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Conducting concurrent rehabilitation ensures that we reduce the end-of-life closure liability.

Zimplats conducts annual closure liability assessments aligned with the Group's assessment methodology and protocols, and the operation's closure liability estimates were reviewed by independent closure planning experts and updated this year.

The post-mining land use for both the Ngezi Operations as well as the Selous Metallurgical Complex will be grazing and wilderness. The feasibility and sustainability of an ecotourism alternative rehabilitation and closure model for the old open pit areas is still under investigation.

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#### **Mining project ID**

Project 5

#### **Total area rehabilitated (hectares)**

0

#### **Area rehabilitated in the reporting year (hectares)**

0

#### **Describe post-mining land use**

Our efforts around mine closure and rehabilitation continue to focus on ensuring a sustainable post-mining legacy from the project planning phase onwards, working with our stakeholders to address social impacts, managing our financial liabilities and rehabilitating the land around our operations when operations cease. Conducting concurrent rehabilitation ensures that we reduce the end-of-life closure liability.

Impala Canada was acquired in December 2019 and to date there hasn't been any concurrent rehab opportunities. With the decommissioning of the old TSF, rehabilitation opportunities will be realized over the next 5 years. Impala Canada has initiated a new closure plan to include the new tailings expansion. The updated closure plan and the associated increase to financial assurance are currently under review by regulatory agencies.

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## F15 Engagement

### F-MM15.1/F-CO15.1

(F-MM15.1/F-CO15.1) Do you participate in or endorse any of the following global initiatives?

	Participate or endorse?	Comment
Extractive Industries Transparency Initiative	No	
UN Global Compact	Yes	Implats has been a signatory to the principles of the United Nations Global Compact (UNGC) since 2008 and our 2022 ESG Report serves as our advanced level UNGC communication on progress (CoP)
Natural Capital Coalition	No	
Business and Biodiversity Pledge	No	
New York Declaration on Forests	No	

### F-MM15.2/F-CO15.2

(F-MM15.2/F-CO15.2) Do you participate in or support industry-led and/or standards-setting initiatives and organizations promoting sustainability in the mining sector?

	Participating or supporting industry-led and/or standards-setting initiatives?	Comment
Row 1	Yes	At Implats we place a strong emphasis on responsible practices and adhere to internationally recognised guidelines such as the International Council on Mining and Metals (ICMM) Guidelines. We are committed to upholding the United Nations Guiding Principles on Business and Human Rights. Our dedication to sustainability is demonstrated through our active participation in the annual CDP Climate Change, Water and Forest disclosures. Furthermore, we prioritize the well-being and rights of individuals by incorporating the Voluntary Principles on Security and Human Rights (VPSHRs) into our security practices and procedures at our managed sites. Our initiatives align with the United Nations Sustainable Development Goals (SDGs), reflecting our commitment to making a positive impact. We fully endorse the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and support the disclosure guidance provided by the JSE Sustainability and Climate Change.

### F-MM15.2a/F-CO15.2a

(F-MM15.2a/F-CO15.2a) Indicate the initiatives and/or organizations you took part in or supported during the reporting year.

Activities	Initiatives	Comment
Industry-led mining sustainability initiative/organization	ICMM	We strive to follow the International Council on Mining and Metals (ICMM) guidelines. We continue to research industry and international benchmarking and best practices, and to benchmark our own risk management practices against the ICMM principles. Any opportunities identified during this process will be considered to improve our systems and practices. Goals for each of our environmental focus areas, as well as the overarching consideration of environmental management systems (EMS), were compiled and mapped to the relevant SDGs and ICMM Mining Principles.
Standard-setting initiative/organization	Initiative for Responsible Mining (IRMA) Other standard-setting initiative, please specify (Global Reporting Initiative, Task Force on Climate Related Financial Disclosures (TCFD), FTSE / Johannes Stock Exchange (JSE) Socially Responsible Investment, JSE Sustainability and Climate Change Disclosure, Carbon Disclosure Project, )	Implats has committed to conduct an audit against the Initiative for Responsible Mining Assurance (IRMA) standard at one of its operations by 2025.  Our Sustainability Reporting is informed by: The Global Reporting Initiative (GRI) Sustainability Reporting Standards; the FTSE/JSE Socially Responsible Investment (SRI) requirements; internally developed guidelines on reporting, which are available on request; and the JSE Sustainability and Climate Change Disclosure Guidance. Implats is a supporter of the TCFD, and we align our climate-related reporting with its recommendations. We've been supporting the CDP initiative since 2007 and use its guidelines to inform our climate, water and forestry disclosures. In 2022 we received an A rating for disclosures, awareness and water security risk management and a B rating for climate change action and disclosures.

### F-MM15.3/F-CO15.3

(F-MM15.3/F-CO15.3) Do you collaborate or engage in partnerships with non-governmental organizations to promote the implementation of your biodiversity-related goals and commitments?

	Collaborating or partnering with non-governmental organizations?	Comment
Row 1	Yes	Implats collaborates with one organisation to promote the implementation of our biodiversity-related goals and commitments. The collaboration with this organisation is crucial as it enables Implats to leverage expertise, resources, and collective efforts to effectively address biodiversity-related challenges and achieve meaningful outcomes.

## F-MM15.3a/F-CO15.3a

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**(F-MM15.3a/F-CO15.3a) Provide details on main collaborations and/or partnerships with non-governmental organizations that were active during the reporting year.**

**Organization**

Grootvally Blesboksspruit Trust

**Scope of collaboration**

Specific mining project(s)

**Mining project ID**

Project 3

**Areas of collaborations**

Protected areas

**Describe the nature of the collaboration**

Impala Refineries operations are near the Blesboksspruit, a designated Ramsar Convention Wetlands of International Importance. Although our operation does not have any direct impact on the wetlands, it continues to partner in environmental education and conservation initiatives in the area.

**Duration (until)**

No specified timeframe

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## F-MM15.4/F-CO15.4

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**(F-MM15.4/F-CO15.4) Do you engage with artisanal and small-scale miners operating within your concession(s) or their area of influence?**

No

## F-MM15.5/F-CO15.5

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**(F-MM15.5/F-CO15.5) Do you engage with other stakeholders to further the implementation of your policies concerning biodiversity?**

Yes

## F-MM15.5a/F-CO15.5a

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**(F-MM15.5a/F-CO15.5a) Provide relevant examples of other biodiversity-related engagement activities that happened during the reporting year.**

**Activities**

Engaging with local communities

**Mining project ID**

Project 1

**Please explain**

Impala Rustenburg runs community environmental education projects on a continual basis, with a different theme quarterly. The most recent of these focused on water usage and on Arbor Week, which South Africa celebrates annually during the first week of September, calling on South Africans to plant indigenous trees as a practical and symbolic gesture of sustainable environmental management. In support of this, Impala Rustenburg celebrated the whole of September as Arbor Month and introduced various tree planting projects and initiatives across our operations and host communities. Most noteworthy was the processing team that planted approximately 500 indigenous trees along the main access roads leading into the Rustenburg operation. The Stakeholder Engagement Department also identified various schools in our local communities to whom Impala Rustenburg donated fruit trees and created awareness through the distribution of posters and engagements with the scholars.

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**Activities**

Engaging with local communities

**Mining project ID**

Project 4

**Please explain**

At Zimplats, biodiversity management plans derived from the EIAs continue to form the basis of its actions to mitigate any negative impacts on biodiversity. This financial year Zimplats cleared 32.87ha (2021: 8.24ha) of AIS, in this case Lantana camara. The operation will continue with the AIS clearing programme and is committed to raising awareness among employees, contractors and the community on the importance of biodiversity protection and management.

Measures and practices in place to mitigate deforestation include collecting seeds of important plant species ahead of planned projects, revegetation initiatives, conducting awareness training sessions for employees and contractors and participating in and supporting national tree-planting programmes

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## F16 Verification

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## F-MM16.1/F-CO16.1

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**(F-MM16.1/F-CO16.1) Do you verify any biodiversity-related information reported in your CDP disclosure?**

No, we are waiting for more mature verification standards/processes

F17 Signoff

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F-FI

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**(F-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

No additional information to be shared

F17.1

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**(F17.1) Provide the following information for the person that has signed off (approved) your CDP forests response.**

	Job Title	Corresponding job category
Row 1	Chief Executive Officer	Chief Executive Officer (CEO)

Submit your response

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**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

**Please confirm below**

I have read and accept the applicable Terms