

Group Risk Management Policy

Implats risk management sets out to achieve an appropriate balance between reward and minimising the risks associated with any activity. Our approach to risk management is consistent with the definition of risk, as given in the new global risk management standard, ISO 31000:2009: “*effect of uncertainty on objectives*”. This creates a clear link with strategic objectives and therefore requires an objective based approach. Our aim is for risk management to be embedded in everything the company does and become part of the Implats culture and lifestyle. Success in this process will result in the following outcomes:

- The Board and senior managers can make informed decisions regarding the trade-off between risk and reward;
- Strategic growth opportunities can be pursued with greater speed, robustness and confidence for the benefit of Implats and its shareholders;
- Greater confidence in achieving the organisation's strategic objectives;
- Daily business decisions at the operating level can be made within the context of the company's capacity to bear risk and the types of risks it prefers; and
- The company can manage the risks associated with non-tangible assets such as customers, partners, intellectual and knowledge capital, brand, processes and systems, just as fully as physical and financial assets.

Our vision with regards to risk management is: *To provide a structured and consistent approach, that aligns strategy, processes, people, technology and knowledge, and to enhance our understanding of the uncertainties that Implats faces, in order to improve our confidence in creating shareholder value.* This vision will be achieved through an enterprise wide risk management framework made up of two cycles. The first is the well known process that is at the core of risk management; day to day risk identification and evaluation. Surrounding these tactical processes is the strategic envelope within which Implats drives and focuses risk management according to:

- Business and strategic objectives;
- Stakeholders' and shareholders' needs;
- The desired risk culture;
- Company structure;
- The plans for advancing risk management;
- The need for control assurance; and
- The Governance requirements of King II.

The approach encourages ownership by giving control of the pace of implementation to each component of Implats. The responsible individuals will then be held accountable for the achievement of their implementation plans. This also implies an approach that gives credit for, consolidates and builds upon, what has been done before.

This Policy is applicable to the entire Implats Group, including subsidiary companies and investments where Implats assumes management responsibility.

The Board will review this Policy at least once every two years.



Chief Executive Officer

15 August 2008