

RESPONSE TO THE MINING CHARTER

Achieved in FY2005	Targets for FY2006	Targets for FY2009										
Human resource development												
Has every employee been offered the opportunity to be functionally literate and numerate by 2005 and are employees being trained?												
<p>6,484 employees have attended ABET courses since 2000.</p> <p>Impala Platinum: Full and part time classes available: 21.7% of employees estimated to be functionally literate and numerate. 772 employees participated in ABET (FY2004: 571) at a cost of R6.4 million</p> <p>Marula Platinum: 77.6% of employees estimated to be functionally literate and numerate. No ABET training in FY2005 as operations were managed by a contractor</p>	<p>800 employees targeted for ABET. This will bring proportion of workforce that is functionally literate and numerate to 22% at a cost of R6.4 million.</p> <p>60 employees targeted for ABET training at a cost of R600,000</p>	<p>800 employees targeted for ABET per annum. This will bring proportion of workforce that is functionally literate and numerate to 26%.</p> <p>240 employees to be trained.</p>										
Have career paths and skills development plans been implemented for HDSA employees?												
<p>An integrated workplace skills development plan has been submitted to the MQA for both Impala Platinum and Marula Platinum. Impala has been accredited by the MQA as a training provider.</p> <p>Expenditure on skills development training amounted to R144 million or 5% of payroll (FY2004: R130 million)</p> <p>Generic career paths for all major disciplines are available to assist employees to follow specific careers. Succession planning and individual development plans are available for all HDSA employees identified in talent pools. 90 HDSA employees are presently busy with accelerated programmes.</p> <p>Impala Platinum and Marula Platinum provided the following full time bursaries in core disciplines:</p> <table border="1"> <tr> <td>HDSA</td> <td>37</td> </tr> <tr> <td>Non-designated</td> <td>16</td> </tr> <tr> <td>Total</td> <td>53</td> </tr> </table> <p>Scholarships to the following:</p> <table border="1"> <tr> <td>Employee children</td> <td>75</td> </tr> <tr> <td>School enrichment scholarship HDSA</td> <td>75</td> </tr> </table> <p>Da Vinci Women in mining project: Seven women are presently completing MSc degrees in innovation and technology. Once they have completed their degrees, they will be placed on the accelerated development programme.</p>	HDSA	37	Non-designated	16	Total	53	Employee children	75	School enrichment scholarship HDSA	75	<p>Similar levels of expenditure are targeted (5% of payroll)</p> <p>Implats to continue to offer accelerated training and development programmes within all major disciplines.</p> <p>Will continue to provide: 53 bursaries. 75 children of employees 75 school enrichment scholarships</p> <p>Impala will continue to support accelerated training of women in mining.</p>	<p>Implats will continue to submit comprehensive workplace skills plans in terms of the charter, social and labour plan and company needs</p> <p>Expenditure of 5% of payroll per annum planned for skills training of payroll and development</p> <p>All HDSA employees on succession plan and talent pool will have individual development plans. To continue to train and develop HDSA talent as per work place skills plan for FY2007 to FY2009.</p> <p>Will continue to provide: 53 bursaries. 75 children of employees 75 school enrichment scholarships</p> <p>Impala will continue to support accelerated training of women in mining.</p>
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Non-designated	16											
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Employee children	75											
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Has the company developed systems to mentor empowerment groups?												
<p>Mentorship programmes have been developed and implemented</p> <ul style="list-style-type: none"> – 41 mentors appointed and trained – 75 protégés appointed and trained <p>4 candidates from the Royal Bafokeng Nation are placed on internal experiential training/mentoring programmes.</p> <p>On a corporate level, mentoring is provided to NGOs, co-operatives and SMMEs.</p>	<p>75 protégés to be mentored</p> <p>Impala will continue to give preference to candidates from the Royal Bafokeng Nation. 40 NGOs to be mentored 20 co-operatives to be mentored 15 SMMEs to be mentored</p>	<p>All employees on succession plan and HDSA talent pools to be mentored.</p> <p>Impala Platinum will continue to give preference to candidates from the Royal Bafokeng Nation. 60 NGOs to be mentored 30 Co-operatives to be mentored 30 SMMEs to be mentored</p>										

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Employment equity																																		
<p>Has the employment equity plan been published and has annual progress in meeting this plan been reported?</p> <p>Yes, Implats has submitted its employment equity plan annually to the Department of Labour since 2003. The employment equity plan is on display on all notice boards at Impala Platinum. A new plan was completed in June 2005.</p> <p>To accelerate employment equity, transformation steering committees have been set up at all operations. These committees were established in consultation with employee representatives and are responsible for ensuring employment equity progress.</p>	<p>The new employment equity plan is to be implemented across the South Africa operations and will be displayed on notice boards at all operations.</p>	<p>The employment equity plan will be continually revised and updated to ensure it is in line with existing legislation</p>																																
<p>Has a plan been established to achieve HDSA participation in Management of 40% within five years and is the plan being implemented?</p> <p>Yes, a plan has been developed to achieve this target by 2007.</p> <p>Current breakdown of management:</p> <table border="0"> <tr> <td>Non-white (male and female)</td> <td>19%</td> </tr> <tr> <td>Male (non-white)</td> <td>16%</td> </tr> <tr> <td>Female (all)</td> <td>15%</td> </tr> <tr> <td>Females (white)</td> <td>12%</td> </tr> <tr> <td>Total HDSA (including white females)</td> <td>31%</td> </tr> </table> <p>This can be broken down as follows (including white women):</p> <table border="0"> <tr> <td>28% Rustenburg</td> </tr> <tr> <td>13% Marula Platinum</td> </tr> <tr> <td>45% Refineries</td> </tr> <tr> <td>45% Corporate office</td> </tr> </table>	Non-white (male and female)	19%	Male (non-white)	16%	Female (all)	15%	Females (white)	12%	Total HDSA (including white females)	31%	28% Rustenburg	13% Marula Platinum	45% Refineries	45% Corporate office	<p>Achieve 30% HDSA management in next year (42%, including white women)</p> <p>Broken down as follows:</p> <table border="0"> <tr> <td>40% Rustenburg</td> </tr> <tr> <td>30% Marula Platinum</td> </tr> <tr> <td>48% Refineries</td> </tr> <tr> <td>55% Corporate office</td> </tr> </table>	40% Rustenburg	30% Marula Platinum	48% Refineries	55% Corporate office	<p>Management targets:</p> <table border="0"> <tr> <td>Non-white (male and female)</td> <td>40%</td> </tr> <tr> <td>Male (non-white)</td> <td>34%</td> </tr> <tr> <td>Female (all)</td> <td>18%</td> </tr> <tr> <td>Females (white)</td> <td>12%</td> </tr> <tr> <td>Total HDSA (incl white women)</td> <td>52%</td> </tr> </table> <p>Broken down as follows:</p> <table border="0"> <tr> <td>52% Rustenburg</td> </tr> <tr> <td>43% Marula Platinum</td> </tr> <tr> <td>50% Refineries</td> </tr> <tr> <td>62% Corporate office</td> </tr> </table>	Non-white (male and female)	40%	Male (non-white)	34%	Female (all)	18%	Females (white)	12%	Total HDSA (incl white women)	52%	52% Rustenburg	43% Marula Platinum	50% Refineries	62% Corporate office
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<p>Has the company identified a pool of talent and is this being fast-tracked?</p> <p>Impala Platinum has a succession and talent pool system in place which includes HDSA employees. The following HDSA employees are presently on accelerated training programmes:</p> <table border="0"> <tr> <td>Learner official mining</td> <td>27</td> </tr> <tr> <td>Learner official metallurgy</td> <td>3</td> </tr> <tr> <td>Mine overseer development</td> <td>11</td> </tr> <tr> <td>Junior engineer</td> <td>5</td> </tr> <tr> <td>Blasting certificates</td> <td>44</td> </tr> </table>	Learner official mining	27	Learner official metallurgy	3	Mine overseer development	11	Junior engineer	5	Blasting certificates	44	<p>Impala Platinum will continue with accelerated training programmes for 90 HDSA employees in mining, metallurgy, mine overseer, junior engineer and blasting certificate training and development. A development plan is being implemented.</p>	<p>Impala and Marula Platinum will continue with accelerated training programmes for HDSA in mining, metallurgy, mine overseer, junior engineer and blasting certificate training and development. The need will be determined from production, succession planning and talent pool requirements.</p>																						
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<p>Has a plan been devised to achieve participation by women of 10% by 2009 and is this plan being implemented?</p> <p>Currently 3.5% of employees are women and 15% of managers are women.</p>	<p>A plan has been developed to achieve this target by 2007.</p>	<p>A plan has been developed to achieve this target by 2007.</p> <p>Management targets:</p> <table border="0"> <tr> <td>Non-white (male and female)</td> <td>40%</td> </tr> <tr> <td>Male (non-white)</td> <td>35%</td> </tr> <tr> <td>Female (all)</td> <td>19%</td> </tr> <tr> <td>Females (white)</td> <td>10%</td> </tr> <tr> <td>Total HDSA (incl white women)</td> <td>46%</td> </tr> </table>	Non-white (male and female)	40%	Male (non-white)	35%	Female (all)	19%	Females (white)	10%	Total HDSA (incl white women)	46%																						
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RESPONSE TO THE MINING CHARTER (cont.)

Achieved in FY2005	Targets for FY2006	Targets for FY2009
<h3>Migrant and foreign labour</h3>		
<p>Has the company subscribed to government and industry agreements to ensure non-discrimination against foreign migrant labour</p> <p>Yes, the company subscribes to such agreements. It also subscribes to the ILO conventions which accord foreign and migrant workers equality before the law. Implats' policy is to reduce the number of migrant workers by focussing on local recruitment, ie employees living within a radius of 60 kilometres of operations.</p>	<p>Group policy is not to discriminate against foreign/migrant labour but to recruit locally where possible.</p>	<p>Increase proportion of local labour making up workforce.</p>
<h3>Mine community and development</h3>		
<p>Has the company co-operated in the formulation of integrated development plans (IDPs) and is it co-operating with government in implementing these plans in communities where mining takes place and in labour-sending areas</p> <p>Both Impala Platinum and Marula Platinum work in close co-operation with public and private sector stakeholders. Since 2003, all major projects implemented by these operations have been incorporated in local government IDPs. Close co-operation is maintained with the relevant authorities in implementing development plans.</p> <p>Impala Platinum has identified projects in the Taung and Eastern Cape areas, and Marula Platinum in the Burgersfort/Steelpoort area. Approximately R10 million was expended in FY2005 on poverty alleviation, education and healthcare projects.</p> <p>Enterprise development: In April 2005, Implats introduced a system of rating suppliers according to both Mining Charter requirements as well as those proposed by the DTI's new Code of Good Practice.</p> <p>Community structures were formed in the vicinity of all Impala Platinum's operations Rustenburg, Refineries and Marula Platinum during FY2005 to facilitate stakeholder involvement. Efforts were made to engage with local communities in labour-sending areas as well.</p>	<p>First projects to be implemented once stakeholder participation process has been completed.</p> <p>Education: Amount allocated to education projects to increase to R7.2 million in FY2006.</p> <p>Healthcare: R2,6 million has been budgeted for healthcare projects planned for FY2006</p> <p>Enterprise development: A baseline will be determined during FY2006 and targets will be revised for FY2009.</p> <p>To continue process of engaging selected stakeholders and learning from each other, R1.2 million has been allocated to develop, maintain and improve stakeholder engagement.</p>	<p>Education: A budget of R8.5 million</p> <p>Healthcare: The target is to develop the capacity of these programmes to conduct 60,000 home-based care visits annually by FY2009</p> <p>Enterprise development: Targets to be revised</p> <p>R2 million has to be allocated in FY2009 to maintain the stakeholder engagement level agreed.</p>
<p>Has the company engaged with local mining communities and those in labour-sending areas?</p> <p>Community structures to facilitate stakeholder involvement were formed in the vicinity of all the South African operations during FY2005. Effort was made to engage with local communities in labour-sending areas as well.</p>	<p>To continue process of engaging selected stakeholders and learning from each other, R1.2 million has been allocated to develop, maintain and improve stakeholder engagement in FY2006.</p>	

Achieved in FY2005	Targets for FY2006	Targets for FY2009								
<p>Housing and living conditions</p> <p>For company provided housing, has the mine in consultation with stakeholders established measures for improving housing, including the upgrading of hostels, conversion of hostels to family units and promotion of home ownership options for mine employees?</p> <p>An accommodation policy has been implemented and a draft accommodation strategy has been submitted to line management for comment.</p> <p>Impala Platinum has two housing schemes:</p> <ul style="list-style-type: none"> • A subsidised scheme which will run for five years only. • A collateral scheme in terms of which 1,510 people have become home-owners. <p>Capital expenditure of R15 million budgeted for FY2004 – FY2006 for housing upgrades, R7.5 million spent to date a upgrade of 97 houses.</p> <p>Currently, three hostels are in use. The number of hostels residents has declined from 9,941 to 9,600. There has been a decline in room density.</p>	<p>A new home ownership scheme is being investigated which is affordable to both the company and the employees.</p> <p>Another 103 houses to be upgraded. The number of hostel residents is to be reduced to 9,000. Hostel residents will be encouraged to stay with their families and will be assisted with the housing option.</p> <p>Discussions with the Housing Forum on hostel matters will continue. Once all stakeholders have reached agreement in terms of hostel conversion, plans will be submitted to management.</p>	<p>The aim is to increase the number of home owners by 10%.</p> <p>200 homes in total will be upgraded. Application for upgrading of company houses approved and upgrading to continue. Hostel residents to be reduced to 7,953.</p> <p>Plans to be implemented, a hostel conversion, (i.e. lower room density, family units or using vacant hostels) for the benefit of the community.</p>								
<p>Have measures been established to improve the nutrition of mine employees? What has been done to improve nutrition? Show plan to progress this overtime and demonstrate that plan is being implemented.</p> <p>At Impala Platinum, the nutritional value of the meals served to hostel residents was evaluated and a more nutritious, balanced menu implemented in September 2004. A new menu which increased the kilojoules provided daily from 14,500 to 17,500 was implemented on 1 December 2004. The cost of this increase is R4 million annually.</p>	<p>A dietician has been appointed to monitor the nutritional quality of meals served and to undertake annual evaluations of the menu. The dietician's report and recommendations will be discussed with hostel structures.</p>	<p>Ongoing annual reports from dietician to be submitted with recommendations.</p>								
<p>Procurement</p>										
<p>Have current levels of procurement from HDSA companies in terms of capital goods, consumables and services been identified.</p> <p>Implats has developed a procurement policy to identify and develop accredited HDSA suppliers and to facilitate the company's spend with such suppliers. Of total spend of R3.9 billion at the South African operations in FY2005, R1,159 billion was spent with HDSA suppliers (FY2004: R500 million).</p> <p>Current estimates are:</p> <table border="0"> <tr> <td>Capital goods</td> <td>9.3%</td> </tr> <tr> <td>Consumables</td> <td>14.4%</td> </tr> <tr> <td>Services</td> <td>5.7%</td> </tr> <tr> <td></td> <td>29.4%</td> </tr> </table>	Capital goods	9.3%	Consumables	14.4%	Services	5.7%		29.4%	<p>A baseline will be determined during FY2006 and targets will be revised by FY2009 according to the criteria required by the draft Code of Good Practice.</p>	<p>A target of 30% of total procurement through HDSA companies has been set for FY2009 according to the criteria set out in the Mining Charter.</p>
Capital goods	9.3%									
Consumables	14.4%									
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	29.4%									
<p>Has commitment been made to a progression of procurement from HDSA companies over a three-five year time frame in terms of capital goods, consumables and services, and to what extent has this been implemented.</p> <p>Yes, such commitment has been made. In April 2005, Implats introduced a system of rating suppliers according to both Mining Charter requirements as well as those proposed by the Department of Trade and Industry's (DTI) Code of Good Practice.</p>										

RESPONSE TO THE MINING CHARTER (cont.)

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<h3>Ownership and joint ventures</h3>								
<p>What is being done to ensure the company achieves 15% HDSA participation in terms of ownership of equity or attributable units of production by 2009 and 26% by 2014.</p> <p>By Implats' own calculation – which is subject to verification and interpretation by the DME – the group's current HDSA holding is in the region of 9%. This is made up as follows:</p> <table> <tr> <td>RBN</td> <td>1.5%</td> </tr> <tr> <td>Credits from sale of Lonplats</td> <td>7.5%</td> </tr> <tr> <td>Marula Platinum</td> <td>20% set aside for BEE stake</td> </tr> </table>	RBN	1.5%	Credits from sale of Lonplats	7.5%	Marula Platinum	20% set aside for BEE stake		<p>Implats is committed to achieving 15% HDSA ownership by 2009 and 26% by 2014.</p>
RBN	1.5%							
Credits from sale of Lonplats	7.5%							
Marula Platinum	20% set aside for BEE stake							
<h3>Beneficiation</h3>								
<p>Has the current level of beneficiation been identified?</p> <p>Platinum is supplied/exported largely in the form of bars to jewellery manufacturers and as a powder to automotive manufacturers, a significant proportion of which is supplied locally to one of the largest manufacturers of autocatalysts.</p> <p>In 2004, the first platinum jewellery beneficiation project, Silplat (Pty) Ltd, in the country was set up. In addition to its equity interest of 17.5% in Silplats, Implats also participates by way of a platinum loan.</p> <p>In excess of US\$100 million of nickel has been sent to local fabricators for beneficiation to stainless steel alloys and castings.</p> <p>As the Beneficiation Act has not yet been promulgated, Implats has appointed a representative to assist the DME to determine the criteria to qualify for an offset.</p>	<p>Targets for growth are entirely dependent on the maintenance of the MIDP scheme.</p> <p>Target beneficiation for 2006 is 400 kilograms.</p> <p>Growth from this sector can only be achieved through additional processing of tolled material.</p>	<p>Together beneficiation growth for the period up to 2009 is as follows:</p> <p>2007 – 500 kilograms 2008 – 600 kilograms 2009 – 700 kilograms</p> <p>US\$150 million</p>						
<p>Has the baseline level of beneficiation been identified and has the company noted the extent by which this will have to increase to qualify for an off-set?</p> <p>As the Beneficiation Act has not yet been promulgated, Implats has appointed a representative to assist the Department of Minerals and Energy to determine the criteria to qualify for an off-set.</p>								
<h3>Reporting</h3>								
<p>Does the company report annually on progress made in meeting its commitments?</p> <p>Yes it does. Since reporting on it for the first time in 2003, Implats has reported annually, both in its annual report and its corporate responsibility report, on progress made in terms of the guidelines set out by the Mining Charter Scorecard.</p>								