



Independent statement of assurance

To the board and stakeholders of Implats:

Implats commissioned Trialogue Assurance Services (TAS) to provide independent assurance over the content of this 2007 Corporate Responsibility Report, hereafter, the 'Report'. The Report presents Implats' sustainability performance over the period 1 July 2006 to 30 June 2007, including, where available, sustainability trend data for previous years.

Trialogue was not responsible for the preparation of the Report and this statement represents the assurance provider's independent opinion. Trialogue's responsibility in performing its assurance activities is to the management of Implats alone and in accordance with the terms of reference agreed with them.

Independence

Trialogue was not responsible for the preparation of any part of this Report and has not undertaken any commissions for Implats in the reporting period concerning reporting or data collection. The assurance team comprised individuals with experience in environmental and social performance measurement. The team has collectively undertaken over 35 assurance engagements in various African countries over the past eight years.

Assurance objective

The objectives of the assurance process were to:

- provide stakeholders of Implats with an independent, 'Limited Assurance' opinion on the consistency, completeness and accuracy of the sustainability performance information presented in the Report. This was confirmed through a review of the claims made and the underlying systems, processes and competencies that support the Report; and
- determine the degree to which the Report is consistent with the reporting requirements of the Global Reporting Initiative's (GRI) G3 Guidelines (hereafter, GRI G3 Guidelines).

Scope of work performed

Sustainability performance indicators

The environmental, health, safety and social performance indicators selected for assurance were determined jointly with Implats, following a review of Implats' key sustainability risks, the identification of indicators considered relevant to stakeholders and management, as well as our experience of the risks associated with reporting sustainability performance and the systems and processes in place to mitigate those risks.

The indicators subject to review were:

Energy consumption; water consumption; direct carbon dioxide (CO₂) emissions; indirect CO₂ emissions; sulphur dioxide (SO₂) emissions; number of new cases of noise-induced hearing loss (NIHL); lost-time injury frequency rate (LTIFR); fatality injury frequency rate (FIFR); number of fatalities; number of employees on anti-retroviral treatment (ART); employee voluntary counselling and testing (VCT) uptake; historically disadvantaged South African (HDSA) persons employed at a management level; number of women in mining; HDSA procurement as a percentage of total procurement; and socio-economic development (SED) spend.

2007

ANNUAL REPORT

GRI G3 compliance

The Report was reviewed to determine the degree to which it was consistent with the GRI G3 guidelines.

Assurance methodology

Sustainability performance indicators

The process used in arriving at this assurance statement is based on the GRI's G3 guidance and other best practice in sustainability reporting assurance. Our approach to assurance included the following:

- a review of Implats' measurement and reporting procedures, background documentation and data collection procedures;
- a review of the Report for any significant anomalies;
- a series of interviews with key personnel responsible for collating and writing various parts of the Report in order to ensure selected claims were discussed and substantiated; and
- the examination of the aggregation and/or derivation of, and underlying evidence for, the indicators under review and statements made in the Report.

GRI compliance

In determining the application level of the Report, we performed the following exercises:

- a review of the process used to define the content of the Report by looking at materiality of issues included in the Report, stakeholder engagement response to stakeholder issues identified, determination of sustainability context and coverage of material issues;
- a review of the approach of management to addressing topics discussed in the Report; and
- a confirmation that the requisite number of performance indicators had been covered in the Report.

Findings

Sustainability performance indicators

In general, the company's environmental and social reporting processes are adequate. However, it was found that:

- corporate reporting definitions and criteria were not clearly defined or communicated to sites, resulting in inconsistent approaches to data management which required rectification prior to reporting;
- no formal periodic, internal verification processes were in place to allow for the identification and resolution of data errors or anomalies; and
- unclear reporting lines, with respect to sustainability performance data management, resulted in uncertainty about the individuals ultimately responsible for information reported by Implats.

GRI compliance

Based on our review of the Report, as well as the processes employed to collect and collate information reported herein, it is our assertion that this Report meets the GRI G3's requirements for Application Level C+. However, it was found that:

- some stakeholder engagement occurs in the active sense, particularly on those issues identified as 'most material', yet many stakeholders are only engaged more in a passive sense through newsletters and media statements; and
- the reporting of performance against some GRI G3 indicators continues to require either data quality improvements, or further detail in disclosure.



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Opinion

Sustainability performance indicators

For most indicators, errors identified during our assessment were addressed by Implats prior to finalising the data reviewed. As a result, we believe that the environmental, health, safety and social data in the Report gives a fair representation of Implats' environmental and safety performance.

GRI compliance

Although the quality or quantity of data of some GRI G3 indicators can be improved, this Report appears to meet the GRI G3's requirements for Application Level C+.

Recommendations

Sustainability performance indicators

- ensure that, prior to the next reporting cycle, operations are providing data for external reporting according to guidance provided by the Corporate Office;
- establish formal procedures for gathering, collating and reporting all quantitative data that appears in the Report, including an internal control process;
- expand the scope of assurance to include appropriate stakeholder engagement; and
- report on issues of materiality, completeness and responsiveness, as guided by AA 1000AS.

GRI compliance

Having addressed the requirements of GRI G3 Application Level C+, it is our principal recommendation that Implats review the process followed in compiling the Report and, while making further improvements on the quality and quantity of data required for Application Level C+, begin addressing the requirements of Application Level B.

Conclusions

Based on the information reviewed, Triologue is confident that this report provides a comprehensive and balanced account of environmental, health, safety and social performance during the period under review. The data presented is based on a systematic process and we are satisfied that the reported performance data accurately represents the current environmental, health, safety and social performance of Implats.

Triologue Assurance Services

6 August 2007