

GRI REPORT

Disclosure number	Disclosure title	Company response	Report and page reference
GRI 102 – GENERAL			
Organisational profile			
GRI 102-1	Name of the organisation	Impala Platinum Holdings (Implats)	
GRI 102-2	Activities, brands, products, and services	Mining, refining and marketing of platinum Group metals (PGMs), as well as nickel, copper and cobalt. An overview is provided in the section on our business at a glance, in the Implats 2019 Sustainable Development Report (SDR). An overview of our business is provided on our website www.implats.co.za .	SDR 4,5
GRI 102-3	Location of headquarters	Johannesburg, South Africa	
GRI 102-4	Location of operations	South Africa and Zimbabwe	
GRI 102-5	Ownership and legal form	See section on our business at a glance . Additional detail is provided on our website: http://www.implats.co.za . Implats is a publicly-traded company listed on the Johannesburg Stock Exchange (JSE).	SDR 4,5
GRI 102-6	Markets served	See section on our business at a glance . Additional detail is provided on our website: http://www.implats.co.za	SDR 4,5
GRI 102-7	Scale of the organisation	Data is provided in the SDR review of our business at a glance and performance data table. Further details are provided in the sustainability section of the Implats website and in the IAR operational reviews .	SDR 4,5,103 IAR 94-133
GRI 102-8	Information on employees and other workers	Our workforce figures are presented in the performance data table in the SDR. Additional details are provided in the performance data tables in the sustainability section of the Implats website. An assessment of our progress in ensuring greater diversity in gender is reported in our 2019 performance on diversity and performance data tables. The majority of our workforce are full time employees, or supervised employees of contractors. We do not have any significant variations in employment numbers as we do not operate a seasonal business.	SDR 53-57, 103-108
GRI 102-9	Supply chain	Implats has a supplier base of more than 2 200 suppliers that spans the entire value chain from exploration to final production of precious metals in the refining process. Supply chain management is reviewed in the SDR. Our approach to procurement is to source all goods and services within the country of operation, and great emphasis is placed on local suppliers especially in close proximity to the operations in South Africa. In Zimbabwe, local suppliers are those that are within the country of operation. Local procurement is advanced through our enterprise development initiatives as described in the SDR section on procurement, enterprise and supplier development .	SDR 17, 76-79
GRI 102-10	Significant changes to the organisation and its supply chain	No major changes to report. Any changes to the quantitative reporting parameters are identified in the relevant sections of the SDR and IAR.	
GRI 102-11	Precautionary principle or approach	The principles that underlie the precautionary approach inform many of our activities, notably in terms of our management of occupational safety and health, and our impacts on the environment. We seek to have a net positive impact on society through our responsible environmental management practices, and through the nature of our resulting investments in social and human capital. Our activities in implementing these principles are described throughout our SDR. Specific examples are provided in the section on conserving natural resources and mitigating impacts .	SDR 84-99

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GRI 102-12	External initiatives	Our SDR has been developed in line with the recommendations of the GRI Sustainability Reporting Standards, and with consideration to the United Nations Global Compact (UNGC). We review how we are responding to the Mining Charter in the sustainability section of our website. We participate annually in the CDP climate change and water disclosure projects.	
GRI 102-13	Membership of associations	Implats has the following memberships: International Platinum Association (IPA), the Minerals Council South Africa, and National Business Initiative. Implats is a signatory of the UNGC.	
Strategy			
GRI 102-14	Statement from senior decision-maker	This is addressed in the CEO statement in the SDR.	SDR 11-13
GRI 102-15	Key impacts, risks, and opportunities	A broad overview is provided in the SDR section on material sustainability issues . More details are provided in the respective sections of the SDR.	SDR 22-29
Ethics and integrity			
GRI 102-16	Values, principles, standards, and norms of behaviour	Our vision, mission and values are outlined in the SDR. The code of ethics can be found on our website.	SDR 3
GRI 102-17	Mechanisms for advice and concerns about ethics	Implats has a code of ethics and fraud policy in place to guide ethical behaviour. A toll-free helpline is in place to facilitate the confidential reporting (whistleblowing) of alleged incidents that are reported to the chief audit executive and the Board chairman.	SDR 19
Governance			
GRI 102-18	Governance structure	An overview is provided in the corporate governance review in our IAR. Detailed information on our governance structure, including the nature of the composition of the Board of directors and the various Board committees is provided on our website and in the corporate governance report within our Notice to Shareholders Report (NSR) for the year ended June 2019, available on our website.	IAR 9-20 NSR 7-8
GRI 102-19	Delegating authority	Information is provided in the SDR section on sustainability governance and in the IAR section on corporate governance .	SDR 16-18 IAR 9-20
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	At an executive level, sustainable development falls under the responsibility of the executive committee (exco), which is responsible for reviewing performance in terms of the Group's non-financial indicators. Exco lends support to the Board's HSER, STR, SET and audit committees. Our chief executive officer (CEO) assumes overall responsibility for sustainability related issues and reports directly to the Board.	SDR 16-18 IAR 9-20
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	Implats has structured and prioritised strategic stakeholder engagement and communication actions and projects across the Group, based on internal stakeholder mapping and risk assessment intelligence. Further information is provided in the section on engaging our stakeholders .	SDR 24-29
GRI 102-22	Composition of the highest governance body and its committees	Full details of the governance bodies can be found in our corporate governance reporting sections.	IAR 10-11 NSR 7-8
GRI 102-23	Chair of the highest governance body	Mandla Gantscho is an independent non-executive director and chairman of the Board.	
GRI 102-24	Nominating and selecting the highest governance body	Our approach is outlined in the Board appointment process. Our Board charter ensures that the diversity of South Africa is considered when appointing board members. Shareholders are involved in the election of board members.	NSR 3

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GRI 102-25	Conflicts of interest	Implats' code of ethics underpins the business practice to which all employees and suppliers are expected to adhere. Our fraud, corruption and whistleblowing policy outlines conflicts of interest and the disciplinary action (including dismissal or prosecution) that will be taken in the event of any contravention. Further information is provided in the SDR section on upholding business ethics and integrity .	SDR 19
GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	A brief review of the two key board committees involved in sustainability governance issues – the social, transformation and remuneration committee (STR), and the health, safety, environment and risk (HSER) committee – is provided in the review of our sustainability governance . A more detailed review of the composition and activities of these Board committees is provided in the IAR and NSR corporate governance sections.	SDR 16 IAR 17-18 NSR 1-15
GRI 102-27	Collective knowledge of highest governance body	The STR committee and the HSER committee address ESG-related issues at the Board level.	
GRI 102-28	Evaluating the highest governance body's performance	The Board and the sub-committees undergo an evaluation process every two years to assess their effectiveness. Further information is provided in the NSR.	IAR 14 NSR 3
GRI 102-29	Identifying and managing economic, environmental, and social impacts	An outline of the process Implats follows can be found in the section reviewing our material sustainability issues .	SDR 22-29
GRI 102-30	Effectiveness of risk management processes	The Group risk profile is presented to the Board quarterly for review. See our risk management and priorities review in the section on our material sustainability issues .	SDR 22-23
GRI 102-31	Review of economic, environmental, and social topics	The STR committee and the HSER committee address ESG-related issues at the Board level. The risks and opportunities are presented to the Board every quarter.	
GRI 102-32	Highest governance body's role in sustainability reporting	At the Board level, sustainability issues are addressed through the STR committee and the HSER committee.	
GRI 102-33	Communicating critical concerns	Critical concerns are reported to the Board by the STR and HSER committees.	
GRI 102-34	Nature and total number of critical concerns	The most material issues are communicated throughout the SDR, as are the responses to these issues.	
GRI 102-35	Remuneration policies	Details are provided in the IAR section on managing performance through remuneration. review of remuneration linked to stakeholders and strategy. Further details are provided in the remuneration report in our NSR.	IAR 21-29 NSR 16-45
GRI 102-36	Process for determining remuneration	Details are provided in the IAR section on managing performance through remuneration . Review of remuneration linked to stakeholders and strategy. Further details are provided in the remuneration report in our NSR.	IAR 21-29 NSR 16-45
GRI 102-37	Stakeholders' involvement in remuneration	Details are provided in the IAR section on managing performance through remuneration . Review of remuneration linked to stakeholders and strategy. Further details are provided in the remuneration report in our NSR.	IAR 21-29 NSR 16-45

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GRI 102-38	Annual total compensation ratio	The focus in recent years on pay differentiation has resulted in a concerted effort to close the wage gap by showing restraint in executive pay while addressing the issue of minimum wages and income differentials to improve the lives of our employees. Details are provided in the IAR review of managing performance through remuneration . Further details are provided in the remuneration report in our NSR.	SDR 46 IAR 21-29 NSR 16-45
GRI 102-39	Percentage increase in annual total compensation ratio	The remuneration packages for the company's top executive are reviewed in the remuneration report in the NRS. The Implats minimum wage for permanent full-time employees remains significantly higher than the prescribed national minimum wage in South Africa. Further details are available on request.	NSR 18-24
Stakeholder engagement			
GRI 102-40	List of stakeholder groups	See the table in the section on engaging our stakeholders .	SDR 24-29
GRI 102-41	Collective bargaining agreements	Currently 83% of permanent employees in South Africa, and 18% of employees in Zimbabwe are covered by collective bargaining agreements (excluding management).	
GRI 102-42	Identifying and selecting stakeholders	See SDR section on engaging our stakeholders and review of stakeholder material matters in the IAR.	SDR 24-29 IAR 57-63
GRI 102-43	Approach to stakeholder engagement	See SDR section on engaging our stakeholders and review of stakeholder material matters in the IAR.	SDR 24-29 IAR 57-63
GRI 102-44	Key topics and concerns raised	See the table in the section on engaging our stakeholders .	SDR 24-29
Reporting practice			
GRI 102-45	Entities included in the consolidated financial statements	The boundary scope and target audience are described in our approach to reporting . Implats reports on all operations for which it has direct management control.	SDR 2
GRI 102-46	Defining report content and topic boundaries	Implats has followed the process for defining the report content as outlined in GRI Standard 101: Foundation. The report content is informed primarily by the expectations of our stakeholders and internal risk management processes, which in turn have informed the identification of our most material issues. Other considerations are the requirements of the King IV Governance Standard – the expectations of which we have progressively aligned with – and the recommendations of the GRI Sustainability Reporting Standards. Material aspects have been chosen with the aim of demonstrating our impacts, risks and opportunities and how we create, preserve and erode value over time. In terms of this GRI Standard table, we have reported against the GRI Standards that are material and for which, we have data. Where applicable, an explanation for not reporting is provided.	
GRI 102-47	List of material topics	An overview of our material matters is presented in our review on our material sustainability issues . In terms of the GRI aspects, those that are not seen to be material are identified in this table, and the reasons for this assessment are provided in the response to each relevant aspect below.	SDR 22-29
GRI 102-48	Restatements of information	All restatements are indicated and explained in our summary performance data and performance data tables.	
GRI 102-49	Changes in reporting	There have been no significant changes since our last report published for the 2018 financial year.	
GRI 102-50	Reporting period	1 July 2018 to 30 June 2019.	
GRI 102-51	Date of most recent report	2018	
GRI 102-52	Reporting cycle	Annual with quarterly production reports issued.	

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GRI 102-53	Contact point for questions regarding the report	Email: investor@implats.co.za Tel: +27 11 731 9000	
GRI 102-54	Claims of reporting in accordance with the GRI Standards	See section our approach to reporting and independent assurance report . This report has been prepared in accordance with the GRI Standards: Core option.	SDR 2, 117
GRI 102-55	GRI content index	See section on our approach to reporting and the independent assurance report . We are reporting in accordance with the GRI Standards: Core option. This document (full content index table) is available on the Implats website (www.implats.co.za).	SDR 2, 117
GRI 102-56	External assurance	Selected performance information has been independently assured through a third-party assurance provider partnership between PricewaterhouseCoopers (PwC) and Nexia SAB&T. See the independent assurance report . The audit committee approves each year: the scope of non-financial data auditing, the appointment of the service provider for assurance, and receives a detailed account of the audit findings and actions from management.	SDR 117
GRI 103: MANAGEMENT APPROACH			
GRI 103-1	Explanation of the material topic and its boundary	Our performance review for each of the topics covers all of our operations over which we have direct control and for which we set and implement policy and standards and for the material aspects identified, unless otherwise indicated in the text. The focus of our report is on those activities directly within our control. The issues of material interest to our stakeholders are listed in the table in the section on engaging our stakeholders – although this does not make explicit reference to the GRI topics, these can be inferred from the table. Material topics have been chosen with the aim of demonstrating our impacts, risks and opportunities and how we create, preserve and erode value over time. This GRI Standard table provides a review of our current process and where Implats needs to make further progress or changes.	SDR 24-29
GRI 103-2	The management approach and its components	Implats manages material topics using similar methodologies. We have a suite of policies, which govern behaviour across ethics, safety, health and environment (SHE), human resources, labour relations, human rights and more. Commitments, goals and targets are approached uniquely within each topic. For health and safety we have a zero harm approach. Where appropriate we participate in collective action to solve systemic issues beyond our factory fence line. Initiatives tackling specific topics can be found throughout the SDR and IAR. Grievance mechanisms are in place for stakeholders to register issues, using the Implats whistleblowers hotline.	
GRI 103-3	Evaluation of the management approach	We report annually on our progress in addressing material topics and impacts in the SDR and the IAR. The STR committee, supported by the SET and HSER committees, address ESG-related issues at the Board level. The risks and opportunities are presented to the Board every quarter. Where the response to a topic is deemed unsatisfactory, we work to redesign our approach with key stakeholders to improve our performance.	
SPECIFIC STANDARD DISCLOSURES			
Economic			
GRI 201-1	Direct economic value generated and distributed	A summary of value-added information is provided in the review of our economic and social value added . A detailed breakdown of the economic value added throughout 2019 is provided on our website.	SDR 61

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GRI 201-2	Financial implications and other risks and opportunities due to climate change	A detailed assessment of the risks and opportunities of climate change, including (where feasible) an assessment of the financial implications, is provided in our most recent CDP submission, available at www.cdproject.net .	
GRI 201-3	Defined benefit plan obligations and other retirement plans	This is disclosed as part of the annual financial statements (AFS), available on our website.	AFS
GRI 201-4	Financial assistance received from government	No significant financial assistance from government towards our socio-economic partnership projects was received in the year reviewed.	
Market presence			
GRI 202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Implats is committed to providing competitive and fair wages and pays according to industry and market benchmarks. Implats minimum wage is significantly higher than the national level in South Africa. There are no local minimum wages that are stipulated. The compensation overview is provided in the remuneration report in the NSR.	SDR 46 NSR 16-44
GRI 202-2	Proportion of senior management hired from the local community	Our procedures focus on drawing skills from surrounding communities within our areas of operation. Within the context of the South African operations, challenges include the low educational levels particularly of youth. Our local hire distribution (represented by historically disadvantaged South Africans (HDSA) is reported in the people performance data in the sustainability section of our website. Local hire is defined as within country of operation, and has been designated according to the proximity to the operation. Employee distribution is based on place of origin and is provided based on province and country. Statistics on the proportion of senior management hired from the local community are available for specific regions on request.	
Indirect economic impacts			
GRI 203-1	Infrastructure investments and services supported	The amount spent on infrastructure developments, and examples of beneficiaries and impacts achieved, are reviewed in the section on investing in community development . Further information is available on request.	SDR 64-72
GRI 203-2	Significant indirect economic impacts	Examples of economic impacts can be found throughout the SDR. For example, we contribute to the provision of public goods and services through taxes paid; we provide sustainable full-time employment (directly and indirectly) and invest in the long-term development of people through training and skills development; and we stimulate economic activity through our enterprise development and procurement activities. Regarding the economic impact on jobs supported in the supply chain, the procure to pay department encourages suppliers to employ people from the local communities; the measurement and management thereof is controlled and reported by the human resources (HR) department.	SDR 48-49, 61, 76-79
Procurement practices			
GRI 204-1	Proportion of spending on local suppliers	The review of our enterprise development and procurement activities demonstrates that we are black economic empowerment (BEE) compliant and promote local procurement in Zimbabwe. Further information is available on request.	SDR 76-79
Anti-corruption			
GRI 205-1	Operations assessed for risks related to corruption	All business units are consistently monitored for fraudulent activity and corruption, including suppliers. Information is provided in the review of our approach to upholding business ethics and integrity .	SDR 19-20

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GRI 205-2	Communication and training about anti-corruption policies and procedures	This issue is addressed in the section on upholding business ethics and integrity . Anti-corruption training continues to be conducted for all procurement personnel, which covers how to identify fraud and corruption and anonymous means of reporting it.	SDR 19-20
GRI 205-3	Confirmed incidents of corruption and actions taken	Information is provided in the table reviewing fraud/ethics-related cases reported Group-wide in the 2019 financial year. During the year, no services of suppliers were terminated.	SDR 20
Anti-competitive behaviour			
GRI 206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	There were no incidences in the current year.	
Materials			
GRI 301-1	Materials used by weight or volume	Provided in our environment performance data tables . Additional details are provided in the sustainability section of our website.	SDR 113-116
GRI 301-2	Recycled input materials used	Apart from recycled water, there is no recycled input identified as being material. Recycled water percentages are provided in our environment performance data tables .	SDR 114
GRI 301-3	Reclaimed products and their packaging materials	Due to the nature and application of our main products, this is not seen to be a material issue. PMG metals are inert and are used in various forms, including in catalytic converters and other applications aimed at "greening" economic activity. An overview of anticipated market developments in this area is provided in review of our operating context in our IAR.	IAR 35-44
Energy			
GRI 302-1	Energy consumption within the organisation	We report our total energy consumption and main types of energy consumption in our environment performance data tables relating to Group material consumption and energy. The section on our energy management and climate change performance includes a review of our efforts aimed at facilitating a switch to greater usage of renewable fuel sources. Operational level energy consumption data is available in the sustainability section of our website.	SDR 88-90, 113
GRI 302-2	Energy consumption outside of the organisation	We do not believe this to be a sufficiently material issue for our internal reporting purposes.	
GRI 302-3	Energy intensity	Implats reports an energy usage intensity measure that takes account of the amount of gigajoules consumed per tonne milled or ounce of platinum produced; this can be deduced from the energy and production data provided in our environment performance data table . Our energy intensity was 0.87 GJ/tonne milled for this reporting cycle.	SDR 90, 113
GRI 302-4	Reduction of energy consumption	Information on our initiatives and targeted reductions is provided in the review of our energy management and climate change performance. Further information can be found in our response to the CDP Climate Programme, available at www.cdproject.net .	SDR 88-90
GRI 302-5	Reductions in energy requirements of products and services	See section on energy management and climate change performance. Through our annual submission to the CDP, we have been reporting the greenhouse gas (GHG) emissions associated with our sold products. Implats does not currently track the reductions of energy requirements of sold products.	SDR 88-90
Water			
GRI 303-1	Water withdrawal by source	Water withdrawals are identified by source in the review of our 2019 water stewardship performance.	SDR 86-87

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GRI 303-2	Water sources significantly affected by withdrawal of water	See the reviews of our water stewardship and management of mine closure, rehabilitation and biodiversity. Further information can be found in our latest response to the CDP's Water Programme (www.cdproject.net)	SDR 86-87, 98-99
GRI 303-3	Water recycled and reused	A total of 16 747 megalitres of water was recycled, which equates to 42% of all the water consumed, against a Group target of 40%. Operational level information on the amount of water consumed that was recycled is disclosed in the sustainability section of our website.	
Biodiversity			
GRI 304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	The name, location and size of operations near such areas is provided in the SDR section on biodiversity . Details of land leased is provided in the environment performance data tables in the sustainability section of our website.	SDR 99, 116
GRI 304-2	Significant impacts of activities, products, and services on biodiversity	The potential impacts are immaterial or negligible, as identified in the SDR section on biodiversity . Impacts are not deemed significant and therefore none are reported.	SDR 9
GRI 304-3	Habitats protected or restored	This is addressed in the section reviewing our rehabilitation and biodiversity performance, and our land management data is available in the performance data table, with further details provided in the sustainability section of our website.	SDR 99, 115
GRI 304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	Our biodiversity studies have revealed our red data species and have highlighted the alien species within our areas of operation. We will seek to report more fully on this information once our GRI Standards process is embedded.	
Emissions			
GRI 305-1	Direct (Scope 1) GHG emissions	We report our total direct CO ₂ emissions in our section on energy management and climate change . GHG emissions have been calculated and reported in accordance with the Defra Voluntary Reporting Guidelines. Operational level information is available in the sustainability section of our website and further details can be found in our CDP report, available on our website and at www.cdproject.net .	SDR 88-90
GRI 305-2	Energy indirect (Scope 2) GHG emissions	We report our total indirect CO ₂ emissions in our section on energy management and climate change . Data by operation is provided in the sustainability section of our website. Additional information can be found in our CDP report, available on our website and at www.cdproject.net .	SDR 88-90
GRI 305-3	Other indirect (Scope 3) GHG emissions	We report our total indirect CO ₂ emissions by operation in our environment performance data tables in the sustainability section of our website. Additional information can be found in our CDP report, available on our website and at www.cdproject.net . Scope 3 emissions reported in CDP reporting has a 12 months' lag. We continue to improve the quality of our measuring of Scope 3 emissions.	
GRI 305-4	GHG emissions intensity	Our emissions intensity (total tonnes of CO ₂ per tonne of ore milled) was 0.20 (based on scope 1 and 2 emissions and a total production of 19 469 kilotonnes milled).	

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GRI 305-5	Reduction of GHG emissions	Each year we conduct a GHG emissions assessment to identify areas for mitigation and efficiencies. We use a GHG handbook that provides a systematic approach to calculating our footprint across the Group and assists in meeting our carbon management and reporting requirements. Our scope 1 and scope 2 emissions are audited. Group-wide reporting of scope 3 emissions remains a challenge; renewed focus will be placed on developing a system to verify and audit scope 3 related data from all operations. Partial information can be found in our CDP report, available on our website and at www.cdproject.net .	
GRI 305-6	Emissions of ozone-depleting substances (ODS)	None of our operations use ozone-depleting substances.	
GRI 305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Information regarding our SO ₂ , NO _x , and PM emissions can be found in our review of air quality management . Our NO _x and SO ₂ emissions are also presented in the environment performance data table. Further details on the SO ₂ and NO _x emissions at each of our operations over the past five years are provided in the sustainability section of our website. All other emissions are deemed not material due to the nature of our activities.	SDR 91-92, 114
Effluents and waste			
GRI 306-1	Water discharge by quality and destination	Currently discharges are not consistently recorded across the Group; this will be included in the future Group approach and to a level deemed of material interest to the target audience of this report. Water quality monitoring and management is undertaken at all operations in line with the relevant requirements.	
GRI 306-2	Waste by type and disposal method	We report partially on this indicator, in our waste management data table. Weight of waste is reported by disposal method and classification.	SDR 115
GRI 306-3	Significant spills	During the year under review there were no significant spills at any of our operations.	
GRI 306-4	Transport of hazardous waste	See section on non-mineral waste . Zimplats is reviewing its practices in line with new hazardous substances management legislation with the aim of ensuring compliance through self-audits next year. All legal requirements in terms of the Basel Convention are being assessed.	SDR 81
GRI 306-5	Water bodies affected by water discharges and/or runoff	Zimplats and Impala Springs both operate close to biodiversity-rich areas. Impala Springs is near the Cowles dam that feeds into the Blesbokspruit, a designated Ramsar Convention wetland of international importance that is deemed under threat. Although Impala Springs is not seen to have any direct impact on this ecosystem, it continues to partner in environmental education and conservation initiatives in the area.	
Environmental compliance			
GRI 307-1	Non-compliance with environmental laws and regulations	There were no non-compliance notices, fines or penalties issued to any of our operations during the review period. No "critical" environmental incidents were reported.	
Supplier environmental assessment			
GRI 308-1	New suppliers that were screened using environmental criteria	Due to the nature of our supplier base and their activities, we do not deem this to be a material issue. This may be reviewed in the future. Our approach to promoting environmental stewardship is reviewed in the section on supply chain management .	SDR 17
GRI 308-2	Negative environmental impacts in the supply chain and actions taken	See above comment. We conduct ad hoc supplier audits against our standards on various criteria including environmental practices. In the year under review, there were no incidents of supplier non-compliance recorded.	

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Employment			
GRI 401-1	New employee hires and employee turnover	See section on workforce movement . Overall level of employee turnover by operation and women turnover, and terminations per age group, are reported in our people performance data tables . Further details are provided in the sustainability section of our website.	SDR 49, 106, 108
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Full-time employees are afforded annual leave, medical aid, accommodation assistance and provident fund benefits. At Zimplats, employees are offered a housing allowance, company accommodation or housing loans for home ownership scheme at Ngezi, a transport allowance or transport provision, Group life cover (100% employer contribution), medical aid cover (100% employer contribution), funeral cover contributory at 50%, long-service awards leave and payments, production and safety bonuses for meeting set targets, education assistance for C3 – C4 graded employees, Mining Industry Pension Fund (MIPF) contributory at 7.5%, technical allowance, service pay. Benefits to employees in South Africa are detailed in the Implats Employee Value Proposition.	
GRI 401-3	Parental leave	Zimplats has no parental leave entitlement. Legally all female employees are entitled to 98 days on full salary for maternity leave. In FY19 all women who went on maternity leave were paid their salaries in full. In South Africa, Implats does not entitle parental leave; we have maternity leave for females and family responsibility leave, as per the Basic Conditions of Employment Act (BCEA) for deaths, illness and births. We do not distinguish between the reasons why this leave is taken.	
Labour/management relations			
GRI 402-1	Minimum notice periods regarding operational changes	In South Africa, a minimum of 30 days' notice period is required for any process and structural changes. Collective bargaining agreements cover notice periods regarding any significant organisational changes. Zimplats: legally in Zimbabwe, contracts of employment are subject to satisfactory completion of three months' probationary period, during which time two weeks' notice of termination of employment by either party is required. Notice to terminate employment by both parties afterwards is three months, served in writing by either party, effective from the date of presentation. However, dismissals have no notice of termination.	
Occupational health and safety			
GRI 403-1	Workers representation in formal joint management/ worker health and safety committees	Employee representative bodies form part of the HSER committees, which function at the individual mine and operational level. These cover all employees working at our operations.	
GRI 403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Provided in the review of our employee and contractor safety and safety data sections .	SDR 32-28, 110-111
GRI 403-3	Workers with high incidence or high risk of diseases related to their occupation	High-risk occupational diseases are identified in our review of employee health and wellbeing .	SDR 39-42

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GRI 403-4	Health and safety topics covered in formal agreements with trade unions	A revised health and safety agreement with all of the employee representative groups was signed in November 2013. All health and safety structures have been put in place in accordance with the requirement of Chapter 3 of the Mine Health and Safety Act. All existing programmes to prevent fatalities and health threatening situations are unchanged and are driven by these safety structures.	
Training and education			
GRI 404-1	Average hours of training per year per employee	The Group average number of hours of training per employee was 68; each contractor received an average of 10.6.5 hours of training. Details of hours of training by gender and employee category are provided in the sustainability section of our website.	
GRI 404-2	Programmes for upgrading employee skills and transition assistance programmes	Implats promotes life-long learning and has programmes in place to help improve the basic literacy and numeracy of employees who were unable to obtain a school leaving certificate. Funds are also allocated for the retraining of employees in the event of redundancies. Many core business training programmes promote employability within and external to the mining industry, including: learnerships, servicemen, mobile and lifting machine licences and MQA skills programmes and qualifications within mining occupation. Soft skills training provided will assist with entrepreneurial possibilities. Educational assistance is offered to employees to study at tertiary institutions to obtain anything from matric, N-certificates to diplomas and degrees in any mining discipline. Zimplats provides a wide range of training and skills enhancing programmes to all level of employees. These programmes can be widely divided into three categories: SHEQ, technical and supervisory. Specialised courses are provided through external service providers. Being a Siemens-approved training centre a full range of instrumentation courses are provided. Trainees include graduate learners across all departments, cadets that study at the Zimbabwe School of Mines, and apprentices in the electrical, boiler making, instrumentation and fitting trades. Basic counselling is offered on site by the Mining Industry Pension Fund to all persons nearing retirement.	
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	We focus our development plans on employees who are either in management roles or who have management potential. All employees in the C5 (C3 at Zimplats) to E level categories received their annual assessments in the year under review. See section on our performance management process . We aim to report more fully on this indicator once our GRI Standards processes are embedded.	SDR 47
Diversity and equal opportunity			
GRI 405-1	Diversity of governance bodies and employees	HDSA representation in our South African workforce is provided in the section on promoting diversity and transformation and workforce diversity profile in the SDR appendix. A detailed review of our workforce by occupational level, gender and race is provided in our performance data – people tables on staff representation, available in the sustainability section of our website. The composition of the Board structure and Exco is detailed in the NSR.	SDR 55-56, 102-104 NSR 6-16
GRI 405-2	Ratio of basic salary and remuneration of women to men	The female to male pay ratio is provided in the people performance data table , with additional details available in the sustainability section of our website.	SDR 109
Non-discrimination			
GRI 406-1	Incidents of discrimination and corrective actions taken	There were no incidents of discrimination reported during the year under review. All operations’ grievance cases are reviewed through the human resources department and the necessary action taken in accordance with the organisation’s disciplinary procedures.	

GRI REPORT

Disclosure number	Disclosure title	Company response	Report and page reference
Freedom of association and collective bargaining			
GRI 407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	All employees in all our operations have the right to freedom of association and collective bargaining. Details on our approach are provided in the section on respecting human rights and investing in employee relations .	SDR 21, 50
Child labour			
GRI 408-1	Operations and suppliers at significant risk for incidents of child labour	We do not believe this to be a material issue. The use of child labour is neither a material risk in the two countries and business sectors in which we operate, nor is it seen to be a material risk in our supply chain. Our labour hire policies clearly stipulate the minimum age for employment, and this is vetted via the submission of the necessary documentation during the hiring process, to verify age. Our human rights policy clearly stipulates the prohibition of child labour. Suppliers are bound by our own policies and procedures.	
Forced or compulsory labour			
GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	We do not believe this to be a material issue. The use of forced or compulsory labour is neither a material risk in the two countries and business sectors in which we operate, nor is it seen to be a material risk in our supply chain.	
Security practices			
GRI 410-1	Security personnel trained in human rights policies or procedures	Information on our approach and progress is provided in the section respecting human rights .	SDR 21
Rights of indigenous peoples			
GRI 411-1	Incidents of violations involving rights of indigenous peoples	We do not believe this to be a material issue. Using the understanding of indigenous peoples as formulated for example by the International Labour Organisation and UN agencies, there are currently no such operations within Implats. However, for the sake of demonstrating diversity management, native Zimbabweans have been referred to as indigenous people in certain parts of our SDR.	
Human rights assessment			
GRI 412-1	Operations that have been subject to human rights reviews or impact assessments	Our human rights policy commits us to full compliance with applicable legislation in the regions in which we operate, as well as implementing the human rights principles in the UN Global Compact. Information on our approach to managing and monitoring contracted labour on human rights issues is provided in the section on respecting human rights .	SDR 21
GRI 412-2	Employee training on human rights policies or procedures	Our approach to training employees on disciplinary enquiry, conciliation and mediation and other human rights related issues is discussed in the sections on upholding business ethics and integrity , and respecting human rights . Total number of hours of training provided is not deemed material.	SDR 19-21
GRI 412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	No operations underwent human rights screening. All clauses included in contracts make reference to our labour policies and practices that contractors must abide by and relate to all human rights related issues.	

GRI REPORT

Disclosure number	Disclosure title	Company response	Report and page reference
Local communities			
GRI 413-1	Operations with local community engagement, impact assessments, and development programs	Information is provided in the sections on engaging our stakeholders, investing in community relations, and investing in community development.	SDR 26-27, 62-72
GRI 413-2	Operations with significant actual and potential negative impacts on local communities	The negative impacts resulting from our activities are primarily associated with natural capital. See the review of our approach and performance relating to conserving natural resources and mitigating impacts. Operational level performance details are provided in our environmental performance data in the sustainability section of our website.	SDR 84-99
Supplier social assessment			
GRI 414-1	New suppliers that were screened using social criteria	We have clear principles that guide the selection of reputable contractors with the right skills and value systems to do specific tasks that we are not able to do. Our approach is reviewed in the section on supply chain management. We endeavour to evaluate progress on transformation objectives and the impacts thereof when we negotiate annual increases. The same evaluation is applicable to new suppliers. There were, however, no assessments in the year under review.	SDR 17
GRI 414-2	Negative social impacts in the supply chain and actions taken	Our approach to monitoring and managing social impacts in the supply chain is reviewed in the section on supply chain management. Our approach to mitigating BEE fronting, which is a key risk, is reviewed in the section on fronting risks. Compliance to BEE legislation is not negotiable and fronting will not be tolerated. During FY2019, no suppliers were suspended as a result of fronting. There are 23 allegations of BEE fronting that are in the process of being investigated.	SDR 17, 78
Public policy			
GRI 415-1	Political contributions	Implats has a policy not to support or to make any donations to political parties.	
Customer health and safety			
GRI 416-1	Assessment of the health and safety impacts of product and service categories	Implats systematically addresses the safety, health and environmental issues relating to its products at all stages of the value chain with proper hazard identification processes as well as risk mitigation. These issues are addressed during conception, research and development, product certification, manufacturing and production. Implats also ensures that the marketing, promotion, storage, distribution, supply, disposal and use are undertaken in a responsible and safe manner, providing end-users with a certificate of analysis for all its products.	
GRI 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	There were no incidents of non-compliance with regulations and voluntary codes in the year under review.	
Marketing and labelling			
GRI 417-1	Requirements for product and service information and labelling	All products are accompanied by a detailed certificate of analysis. All products sold to customers are further beneficiated into end products over which Implats does not have an influence.	

GRI REPORT

Disclosure number	Disclosure title	Company response	Report and page reference
GRI 417-2	Incidents of non-compliance concerning product and service information and labelling	There were no incidences reported in the current year.	
GRI 417-3	Incidents of non-compliance concerning marketing communications	Implats does not partake in product marketing or advertising as product sales are managed through standard sale agreements with clients. However, Implats contributes to the Platinum Guild International which is responsible for the promotion and marketing of Platinum Jewellery.	
Customer privacy			
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	There were no incidences reported in the current year.	
Socio-economic compliance			
GRI 419-1	Non-compliance with laws and regulations in the social and economic area	There were no incidences reported in the current year.	