



Driefontein Gold Plant International Cyanide Management Code Certification Audit

Summary Audit Report

Sibanye Stillwater Limited

Driefontein One Plant, Gold Operations
1 Main Offices,
Driefontein,
Carletonville.

Prepared by:

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Basis of Report

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Acronym / abbreviation	Description
CIL	Carbon-in-Leach
CIP	Carbon-in-Pulp
DMRE	Department of Mineral Resources and Energy
DWS	Department of Water and Sanitation
ERT	Emergency Response Team
HCN	Hydrogen Cyanide
HDPE	High Density Polyethylene
HMS	Hazard Management System
ICMC	International Cyanide Management Code
ICMI	International Cyanide Management Institute
PMS	Planned Maintenance System
PPE	Personal Protective Equipment
ppm	Parts Per Million
PTO	Planned Task Observation
RWDs	Return Water Dam
Sasol	Sasol South Africa (Pty) Ltd.
SCADA	Supervisory Control and Data Acquisition
SDS	Safety Data Sheets
Sibanye	Sibanye Stillwater Limited
SLR	SLR Consulting (South Africa) (Pty) Ltd
SPG	Standard Procedure Guideline
SSMS	Stefanutti Stocks Mining Services
The Code	The International Cyanide Management Code for the Manufacture, Transport, And Use of Cyanide in the Production of Gold and Silver
The Plan	<i>MET2.3C-ERP Emergency Response Plan - Sodium Cyanide</i>
The Plant	Driefontein Gold Plant
The Protocol	The Mining Operations Verification Protocol
TSF	Tailings Storage Facility
WAD	Weak Acid Dissociable



1.0 Summary Audit Report for Gold Mining Operations

Name of Cyanide User Facility: Driefontein Gold Plant

Name of Cyanide User Facility Owner: Sibanye Stillwater Limited

Name of Cyanide User Facility Operator: Sibanye Stillwater Limited

Name of Responsible Manager: Jackson Hopane, Plant Superintendent

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2.0 Location and description of operation

Globally, Sibanye-Stillwater is the third largest producers of platinum and palladium, and features among the world's top gold producing companies. Domiciled in South Africa, Sibanye-Stillwater owns and operates a portfolio of high-quality operations and projects, which are located and managed in two regions: the Southern African (SA) region and the United States (US) region. Since its establishment in 2013, the company has transformed itself geographically and by metal produced. From being a South African gold mining company, Sibanye-Stillwater is now an internationally competitive, diversified precious metals miner producing gold and platinum group metals. With the formal acquisition of Stillwater in May 2017, Sibanye Gold was rebranded as Sibanye-Stillwater. The company has its primary listing on the Johannesburg Stock Exchange, South Africa and is also listed on the New York Stock Exchange.

The Gold Plant was commissioned in 1972. The Plant was initially designed and installed to treat 100 000 tonnes of ore per month but this has been gradually increased to a monthly throughput of 240 000 tonnes.

The mineral processing technology in the plant is based on a semi-autonomous grinding (SAG) milling circuit, followed by cyanide leaching. The initial filtration and zinc precipitation process was replaced by carbon in pulp (CIP) process). A centralized elution and smelting facility capable of processing 18 tonnes of carbon (2 x 9 tonnes Zadra elution batches) was

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installed. The retrofitted SAG mill installation was commissioned in September 2003, replacing the conventional crushing and milling circuits.

Milling Section

A number of shafts in Driefontein have closed due to declining production volumes, and in order to fill the plant production capacity to reduce unit costs and maximise revenue and profit, low grade Surface Rock Dumps (SRD) were introduced. Run-of-mine (ROM) ore is now received from 1, 2, 4, 5 and 8 shafts respectively. All of the conveyed ore is discharged into one of three stock silos with a total surge capacity of 10 500 tonnes. Two feeders feed the ore from the silos onto parallel conveyor belts, both feeding their respective mill feed conveyors.

The reef and SRD split has gradually moved towards a 50/50 split with reduced ROM from the shafts over the years. There is a facility to add SRD directly onto the mill feed conveyors with a front-end loader to allow maintenance on the silo feed conveyors, but also to create capacity in the silos only for reef ore so that gold ore is not washed away by rain. Each mill feed belt is fitted with a go-belt sample cutter, online moisture analyser and meter for mass and gold measurements.

The milling circuit consists of two 250 tonne per hour refurbished SAG mills. Each milling circuit is closed with a cyclone cluster comprising 6 inclined cyclones (3 operational, 3 standby). The ore is ground to a final product size of 80% finer than 75 microns and the pulp overflows to the thickeners section through a linear screen (to remove woodchips or any debris).

Leach Section

Thickening takes place in three Supaflo high rate thickeners. The thickener underflow pulp is pumped to the leaching circuit passing through a linear screen with 1000 µm cloth aperture for the removal of any trash/woodchips. The thickener overflow is returned to the milling circuit as mill dilution water.

The leach circuit consists of sixteen 1100 m³ air agitated leach tank with 60° conical bottoms. The leach pulp is pre-aerated for a period of 3-4 hours in one of the leach tanks prior to cyanide addition for gold dissolution under protective alkaline conditions.

The Driefontein Gold Plant uses liquid cyanide that is purchased cyanide from Sasol South Africa (Pty) Ltd (Sasol) that is manufactured at Sasolburg in South Africa. This is a facility that is certified as being in compliance with the Code. Driefontein has only used liquid cyanide from Sasol since it started operations. The liquid cyanide is offloaded into storage tanks from the tanker from where it is sent to the dosing points.

The cyanide control system comprises of a feed forward ratio control using the feed dry mass from the thickener underflow mass flow system and feedback control from the TAC 1000 on-line free cyanide analyser controlling cyanide dosing rates to Leach Tank No 1. The Plant uses a two point dosing system with the cyanide dosage to stream 2 controlled only by reading from the TAC 1000 sample from the tank.

Gold dissolution is achieved during a 32 – 48 hour retention period, influenced by volume of ore processed or number of leach tanks online, allowing for maintenance time. The leached slurry gravitates to a pump cell circuit, which consists of eight 125 m³ mechanical agitated

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pump cell tanks filled with carbon at a concentration of 60 – 75 grams per litre. The carbon adsorbs gold from the leach gold solution.

The carbon is removed from the pump cell circuit on a batch basis. The carbon is then treated with a dilute hydrochloric acid solution to remove calcium and organics build-up inside the carbon pores. Gold is then stripped from the carbon in an elution process and precipitated from the elution solution in a continuous electro-winning cell. After the elution process the carbon is re-activated in electrical heated kiln at 7 and returned to the adsorption circuit.

Residue and Backfill

The residue slurry from the CIP pump cell circuit can be thickened and pumped underground as backfill, or it can be pumped directly to the tailings storage facility (TSF) at a concentration of less than 50 mg/l weak acid dissociable (WAD) cyanide. Water recovered from the TSF drains to the return water dams prior to being pumped back to the Plant, where it is re-used as process water. The concentration of WAD cyanide in the Return Water Dams (RWDs) is less than 0.5 mg/l and therefore these are not classed as being cyanide facilities.

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SUMMARY AUDIT REPORT

Auditors Findings

in full compliance with

**The International
Cyanide Management
Code**

Driefontein Gold Plant is: in substantial compliance with

not in compliance with

Audit Company: SLR Consulting (Africa) (Pty) Ltd
Audit Team Leader: Ed Perry, Lead Auditor
Email: eperry@slrconsulting.com
Mine Technical Auditor Dawie Viljoen, Afritech (ICMI pre-certified Mine Technical Specialist).

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Signature of Mine Technical Auditor

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DATES OF AUDIT

The Certification Audit was undertaken between 4 December 2023 to 7 December 2023.

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute (ICMI) and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

The "International Cyanide Management Code for The Manufacture, Transport, And Use of Cyanide In The Production Of Gold and Silver" (the Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

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The Code is a voluntary industry programme for gold and silver mining companies, and companies involved with the production and transport of cyanide to gold and silver mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide or use cyanide to recover gold and silver, audited by an independent third party to determine the status of the Code's implementation. Those operations that meet the Code's requirements can be certified and are able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in gold and silver mining and assist in the protection of human health and the reduction of environmental impacts (refer to www.cyanidecode.org). The Code is managed by the ICMI.

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Principle 1 – Production and Purchase

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally Protective Manner.

Standard of practice 1.1: Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 1.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 1.1; to purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

Driefontein Gold Plant (Driefontein) purchases liquid cyanide from Sasol South Africa (Pty) Ltd (Sasol) that is manufactured at Sasolburg in South Africa and delivered by road tanker. This is a facility that is certified as being in compliance with the International Cyanide Management Code (the Code). Driefontein has only used liquid cyanide from Sasol since it started operations. Sasol is the only supplier of liquid cyanide in Africa and Driefontein does not have the ability to use solid cyanide.

Sasol Operation is currently certified as fully ICMI. Sasol was first certified on 8 March 2007 and most recently recertified on 7 March 2022.

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Principle 2 – Transportation

Protect Communities and the Environment During Cyanide Transport.

Standard of practice 2.1: Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 2.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 2.1 requiring that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

The operation has chain of custody records or other documentation identifying all transporters responsible for transporting cyanide from the producer to the operation.

Driefontein orders and receives liquid Sodium Cyanide from the Sasol Cyanide Production Facility in Sasolburg, South Africa. The liquid cyanide is transported by tanker operated by Tanker Services Food and Chemicals / Imperial Logistics (Tanker Services) to Driefontein on the same day. An order is placed with Sasol for the whole month and deliveries take place as required.

All identified transporters are individually certified in compliance under the Code or included in certified supply chain.

Tanker Services is the only transporter carrying liquid cyanide by tanker from the Sasol production facility to the gold mines in South Africa.

Tanker services was initially certified as fully compliant with the ICMC as a cyanide transporter on 13 December 2011 and was most recently recertified on 1 April 2022.

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Principle 3 – Handling and Storage

Protect Workers and the Environment During Handling and Storage.

Standard of practice 3.1: Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 3.1; design and construct unloading, storage and mixing facilities consistent with sound accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

The facilities for unloading, and storing liquid cyanide been designed and constructed in accordance with Sasol, the cyanide producers' guidelines, applicable jurisdictional rules and/or other sound and accepted engineering practices for these facilities.

A Sasol technical inspection of the unloading and storage facilities is conducted annually. The latest report was undertaken on 17 May 2023 by Mosala Mokoena. The audit score was 99% with the deficiencies being faded signage and the pressure for the eye wash was too high. It was confirmed during the site inspection that these issues had been corrected.

The liquid cyanide is unloaded on a concrete surface that can minimise seepage to the subsurface and the unloading area is designed and constructed to contain, recover or allow remediation of any leakage from the tanker truck. It was verified during the site inspection that unloading takes place on a concrete pad, sloped, and draining into bund area via a valve. The concrete pad was observed to be in a good condition. Any spillage in the cyanide storage bund is pumped to the leach feed.

There are systems in place to prevent the overfilling of cyanide storage tanks, and are the systems are tested and maintained on a routine basis.

Procedure *MET.2.3C-SPG2 Offload Sodium Cyanide into Bulk Storage Facility*, dated 1 April 2021 states that the chemical handler closes the air valve to prevent overfilling of tanks. The offloading air solenoid valve is interlocked with the high-level setting of 90% on the tanks automatically closing the air closing the air, and the high level alarm will sound. There is a

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level indicator display at storage area and on the Supervisory Control and Data Acquisition (SCADA) system.

The cyanide level measurement system is inspected on a monthly basis as part of the PRAGMA planned maintenance system.

It was verified by the auditors during the site inspection that the cyanide storage tanks are conically designed tanks installed on steel uprights such that any leaks can be visibly observed. The tanks are located inside a concrete bund to prevent seepage to the subsurface.

All cyanide delivered to site is in the form of liquid cyanide and stored in tanks in a secure open air compound with restricted access inside the Plant which also has restricted access. The offloading and storage facility is located away from people and surface water.

The tanks' overflow pipes are equipped with hydrogen cyanide (HCN) gas traps and ventilation pipes are fitted to top of tanks. No incompatible materials are stored close by, and area is equipped with bund walls which prevents the inflow of any rainwater or other materials.

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Standard of practice 3.2: Operate unloading, storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 3.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 3.2; operate unloading storage and mixing facilities using inspections, preventative maintenance, and contingency plans to prevent or contain releases and control and respond to worker exposures.

The Plant only uses liquid sodium cyanide delivered in bulk tankers from the Sasol production facility in South Africa. No solid cyanide is used.

Procedure *MET.2.3C-SPG2 Offload Sodium Cyanide into Bulk Storage Facility*, includes the steps to be undertaken for rinsing the offloading hoses before it returns to the Tanker Services depot. The rinse water then enters the Cyanide Storage Tank bund and is subsequently pumped back to the leach feed.

The operation has developed and implemented plans or procedures to prevent exposures and releases during cyanide unloading and mixing activities including the following.

a) Procedure *MET.2.3C-SPG2 Offload Sodium Cyanide into Bulk Storage Facility*, dated 1 April 2021 includes operation of valve and couplings in Section 4 Steps / Sequence of events including connection and disconnection of cyanide offloading hoses. In addition, the Cyanide Offloading Checklist is used for each offloading event to ensure that the operation is undertaken in the correct manner, including the operation of all hoses, valves and couplings. The following examples of the checklist were observed; 04 April 2023, 13 April 2023, 08 March 2023, 18 March 2023, 4 May 2023, 09 May 2023. Procedure *MET.2.3C-SPG Inspect Plant Areas*, dated 15 Feb 2023. All pipes and valves are inspected and recorded in the Shiftily Log Sheet, the entry for 23 March 2023 was observed. The checklist covers the Cyanide Storage Facility including the maintenance of; cyanide delivery hoses, valves and couplings. The maintenance of the liquid cyanide tanker including associated hoses, valves and couplings connect to the tanker are the responsibility of the cyanide transporter.

b). The liquid cyanide is delivered by road tanker and therefore a procedure is not required to prevent rupturing or puncturing.

c). The liquid cyanide is delivered by road tanker and therefore a procedure is not required to limit the height of stacking of cyanide containers.

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- d) Timely cleanup of any spills of cyanide during mixing and transfer of liquid cyanide from tanker trucks is detailed in *MET.2.3C-SPG16 Clean Up Spillage - Reagent Strength Sodium Cyanide*
- e) Procedure *MET.2.3C-SPG2 Offload Sodium Cyanide into Bulk Storage Facility*, includes Section 4.3 Inspect and dress up in appropriate compulsory PPE. Procedure *MET.2.3D-SPG21 Perform buddy duties and responsibilities*; dated October 2019, describes the role and responsibilities of the second individual observing from a safe distance (i.e. the Buddy).
- f) The auditors observed during the site inspection that the colour of the liquid cyanide at the dosing 1 point is red due to the incorporation of the dye by Sasol during the manufacturing process.

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Principle 4 – Operations

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment.

Standard of practice 4.1: Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.1; to implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

The operation has developed written management and operating plans or procedures for cyanide facilities including unloading, and storage facilities, process plants, and tailings impoundments.

The Driefontein Plant has 34 procedures for the management and operation of cyanide related processes including offloading and inspections.

Stefanutti Stocks Mining Services (SSMS) has a list of 14 procedures for the operation of the TSF.

In addition to the SSMS procedures there is; the Sibanye Stillwater: Driefontein Division: Mandatory Code of Practice for Mine Residue Deposits, dated 24 August 2022, by Knight Piesold, and

The Driefontein TSF - Tailings Operations, Maintenance and Surveillance Manual July 2022, Ver 1.0 dated 28 September 2022.

The operation's plans and procedures identify and account for the assumptions and parameters on which the facility's design was based and any applicable regulatory requirements as necessary to prevent or control cyanide releases and exposures consistent with applicable requirements.

Procedure *MET2.3 C- SPG8 Response to High WAD Samples* dated September 2023 specifies WAD cyanide operating levels in Section 3.1 specifying action when WAD cyanide levels exceed 50 ppm in the tailings.

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The Plant Metallurgist enters any changes in the setpoint of the free cyanide concentrations in a logbook, the entry for 22 November 2023 changing the set point from 280 ppm to 290 ppm was observed by the auditors. At the time of the audit the settings at doing point 1 was 290 ppm free cyanide and at dosing point 2 was 150 ppm free cyanide.

The auditors observed pH level alarms on the SCADA set at 10.6 for the first low level alarm with the TAC 1000 being interlocked at pH 10.3.

The auditors observed the Sibanye Gold Operations Driefontein TSF 1 & TSF 2 – Quarterly Monitoring Report, Q1 2023 by Knight Piesold dated 20 May 2023 section 4.6.2 states that the freeboard for the TSF is 800 mm above the combined elevation of the operating water level plus a 1:50 year storm pond level which is 1.26 m for TSF 1 and 1.24 m for TSF 2. The report noted that the freeboard was adequate.

RWDs and Plant Catchment Dam (PCD) water levels and subsequently the available freeboards are measured using level indicators, which are displayed on the SCADA system. The RWDs are kept empty to ensure they are able to cope with a storm event, their inspection is included in the daily and weekly inspection of the TSF.

The TSF conducts daily, weekly and quarterly inspections and reviews, which detail the freeboard that is available, ensuring that it is within the legally prescribed limits.

SER.2.4A SPG Reporting, Investigation and Administration of Accidents and Injuries, dated May 2023. This includes a process overview, occurrence of reporting, role of safety department, role of operational staff, role of health services. Annex 3 includes checklists for the responsibilities of the various departments.

An example of an investigation report for an accident on the 30 April 2023 resulting from a truck colliding with a tree due to the failure of the truck's brakes.

The report includes details of the accident, personal details of the injured, training details, investigation team members, locality plan, observations during the inspection, sequence of events, findings, recommendation to prevent similar accidents, The investigation was signed off by the relevant Departmental Managers and the attendance register for the investigation meeting 05 May 2023.

The operation has plans and procedures that describe the standard practices necessary for the safe and environmentally sound operation of the facility including the specific measures needed for compliance with the Code, such as water management, inspections and preventive maintenance activities.

Procedure *MET.2.3C-SPG39 Inspect Plant Areas* details the inspections that need to be undertaken of the Plant on a shiftly basis. All faults identified are recorded by raising a work order as part of the PRAGMA planned maintenance system, which is submitted to Engineering for repairs. Cyanide Offloading checklist inspects the offloading area including the first aid room that is adjacent to the offloading area, prior to any offloading event.

SER.EE.2.4 SPG-32 Fire Extinguisher Standard Procedural Guideline, dated August 2020 details the checklist for monthly inspections, and requires a monthly inspection sticker as well as annual inspection sticker placed on the unit. Emergency Safety Showers are tested as part of the Offloading Inspection. The Emergency Safety Showers are also inspected on a monthly basis as part of the planned maintenance system.

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The PRAGMA planned maintenance system includes all critical elements of the Plant with inspections on a weekly, monthly, 6 monthly or annual basis. This includes tank thickness testing and structural inspections.

The Sibanye Gold Operations Driefontein TSF 1 & TSF 2 – Quarterly Monitoring Report, Q1 2023 by Knight Piesold dated 30 May 2023 includes tailings deposition, pool management, freeboard, rate of rise, TSF profile, piezometer records, underdrain flows, climate records, return water and stormwater dams, environmental, findings, action list, conclusions and recommendations. This report included the following.

- Freeboard: the graph of freeboard showing compliance.
- Rainfall: includes graphs of maximum 24 hr storm per month as well as monthly rainfall trend.
- Conclusion: the TSFs are considered well managed and stable.

Sibanye Gold Operations Driefontein TSF 1 & TSF 2 – Quarterly Monitoring Report, Q2 2022 by Knight Piesold dated 20 September 2023.

- The TSFs are considered well managed and stable.

SSMS conducts daily TSF inspections. This included wildlife mortality, slurry pipeline and valves, and personal gas monitor readings.

Freeboard is measured using surveyed poles and entered on the Excel spreadsheet on the monthly inspections. The monthly inspection checklists include piezometer readings, drain flow, rainfall, tonnages and densities, freeboard, and tower alignment.

The operation implements procedures to review proposed changes to production processes, operating practices, or cyanide facilities to determine if they may increase the potential for cyanide releases and worker exposures, and incorporate any measures necessary to protect worker health and safety and the environment.

Safety 2.4A SPG Change Management, dated September 2019 includes; process overview, identifying need for change, planning for change, and change implementation. Annexure A includes the forms for the documentation of the change management process. Section 2.8 of the procedure states that the changes requested must be reviewed by the relevant Head of Department and subject matter expert i.e. if the change gives rise to any environmental or health and safety issues the Head of that Department is required to review the form and sign as evidence of this.

The operation has cyanide management contingency procedures for non-standard operating situations that may present a potential for cyanide exposures and releases, such as those detailed below.

The Sibanye Gold Operations Driefontein TSF 1 & TSF 2 – Quarterly Monitoring Report, Q1 2023 by Knight Piesold dated 20 May 2023 section 4.6.2 states that the freeboard for the TSF is 800 mm above the combined elevation of the operating water level plus a 1:50 year storm pond level which is 1.26 m for TSF 1 and 1.24 m for TSF 2. The report noted that the freeboard was adequate. The freeboard is measured on a monthly basis.

RWDs and PCD water levels and subsequently the available freeboards are measured using level indicators, which are displayed on the SCADA system. If there is a storm event the

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Plant will stop operating in order to reduce the amount of water on the TSF. The RWDs are kept empty to ensure they are able to cope with a storm event.

Any problems identified by facility monitoring or inspections will instigate a work order being raised to rectify the problem as part of the maintenance process.

Standard stopping and starting procedures for the various sections of the Plant are used during planned shutdowns. A National Strike/ Stay Away Contingency Plan, dated March 2023 was observed that details the processes for a shutdown longer than that undertaken as part of the normal maintenance programme. This was implemented in response to a national strike in March 2023. The procedures include *MET.2.3D KP2 Start-up Metallurgical Processes*, dated December 2018, which details the process for starting up the Plant following a partial or total planned or unplanned shutdown. *Temporary Closure of a Cyanide Facility*, October 2023. Includes the steps to undertake in the event of an abnormal event. This includes closure due to pandemics, strike action, social unrest, TSF failure, major breakdowns, update in the water balance, lack of ore, regulatory actions, or lack of essential materials to operate the Plant.

The operation's contingency procedures as detailed above account for how cyanide would be safely managed during short-term and long-term shutdowns or cessations in operation. This includes the management of any cyanide on site, including liquid cyanide (which would remain in the dedicated storage area), and cyanide solution within tanks, vessels, pipelines, ponds and impoundments.

The operation uses liquid cyanide delivered by road tanker and therefore does not have a mixing facility as the liquid is offloaded directly into the cyanide storage tanks. The operation inspects the following at unloading, storage, and process areas.

The planned maintenance system includes the inspection of the cyanide solution storage tanks and leach tanks thickness testing is conducted annually by Quest Technical Services using a B-Scan which showed the maximum and minimum thickness for the tanks. This testing included a visual inspection for signs of corrosion and leakage and stated that the tanks had adequate thickness.

The PRAGMA planned maintenance system includes all critical elements of the Plant with inspections on a weekly, monthly, 6 monthly or annual basis. This includes tank thickness testing of cyanide solution storage tanks and leach tanks. Structural inspections are also undertaken of all tanks including CIP, elution tanks and tailings tanks.

Procedure *MET.2.3C-SPG Inspection Plant Areas* details the inspections that need to be undertaken of the Plant on a shiftly basis, which includes secondary containments provided for tanks and pipelines for physical integrity, the presence of fluids and available capacity. At the end of the shift any deficiencies are recorded in the Shift Supervisors Inspection Book. There are no drains that are required to be locked to prevent accidental releases to the environment. The tailings pipeline is inspected daily, and the condition recorded as part of the Tailings Dam Daily Log Sheet.

There are no leak detection systems at any of the ponds, and there is no heap leach facility on site.

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In addition to pipelines, pumps and valves being inspected as part of the shiftly Plant inspection, they are also included on the planned maintenance system.

Ponds and impoundments are inspected for the parameters identified in their design documents as critical to their containment of cyanide and solutions and maintenance of the water balance, such as available freeboard. Surface water diversions are not required for the TSFs as they are a land raise. Surface water diversions for the RWDs and Plant, which includes the Catchment Dam, are included in the daily and weekly inspection of the TSF and Plant respectively.

Freeboard of the TSF is measured using surveyed poles and entered on the checklists on a monthly basis. This also included piezometer readings, drain flow, rainfall, tonnages and densities, freeboard, and tower alignment.

The operation inspects the cyanide facilities on an established frequency sufficient to ensure and document that they are functioning within design parameters.

Procedure *MET.2.3C-SPG39 Inspection Plant Areas* details the inspections that need to be undertaken of the Plant on a shiftly basis. Cyanide Offloading checklist inspects the offloading area including the first aid room that is adjacent to the offloading area, prior to any offloading event.

SER.EE.2.4 SPG-32 Fire Extinguisher Standard Procedural Guideline, dated details the checklist for monthly inspections. The PRAGMA planned maintenance system includes all critical elements of the Plant with inspections on a weekly, monthly, 6 monthly or annual basis.

The TSF is inspected on a quarterly basis by Knight Piesold. Wildlife mortalities are inspected on a daily basis by the TSF staff.

The inspections are documented either through various checklists or reports as detailed above or through the planned maintenance system, PRAGMA. The inspections are documented with the documentation identifying specific items to be observed and include the date of the inspection, the name of the inspector, and any observed deficiencies. The nature and date of the corrective actions are detailed on the work orders raised through the PRAGMA system.

PRAGMA the preventative maintenance system has been in place since 2008, the system covers critical cyanide equipment as part of an asset register. The Asset Register confirmed to include; thickener pumps, spillage pumps, cyanide pumps, tank instrumentation, elution, treatment pump, elution spillage pump, barren pumps, cyanide storage area, slurry transfer pumps, leach tanks, fixed HCN gas monitors, cyanide pumps, cyanide tanks, cyanide instrumentation, cyanide man down alarms, and safety showers.

The operation has the necessary processes to prevent unintentional releases and exposures in the event that its primary source of power is interrupted. Driefontein Gold Plant is linked to 3 power supply sources on a ring main system, reducing the risk of a major power failure over an extended period of time.

The Plant has been designed with bunds and sumps to contain all slurries and solutions before it is pumped back into the process, therefore no spillage will occur during power

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failures. Should any sumps or bunds overtop, the Catchment Dam is designed to contain any spillage from the Plant.

The pumping systems are designed with interlocks and safe systems to prevent spillages during power failures. If there is a storm event the Plant will stop operating in order to reduce the amount of water on the TSF. The RWDs are kept empty to ensure they are able to cope with a storm event.

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Standard of practice 4.2: Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.2; introducing management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation is in full compliance with Standard of Practice 4.2; introducing management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

The operation implements a program to evaluate cyanide use in the mill and adjust the addition rate to minimize its use.

Bottle roll tests are done on different ore sources monthly including underground and rock dump material. The SRD are tested before fed to the Plant for reagent consumption and recovery to assist with feed mix planning.

The cyanide control system comprises of a feed forward ratio control using the feed dry mass from the thickener underflow mass flow system and feedback control from the TAC 1000 on-line free cyanide analyser controlling cyanide dosing rates to Leach Tank No 1. The Plant uses a two point dosing system with the cyanide dosage to stream 2 controlled only by reading from the TAC 1000 sample from the tank. The control system principles were confirmed by the Instrumentation Technician and the Plant Manager. Cyanide level parameters are determined from results of the optimisation tests and is authorised and instructed by the Plant Superintendent via an instruction in the Log Book.

The Plant Metallurgist enters any changes in setpoint of the free cyanide concentrations in a logbook, the entry for 22 November 2023 changing the set point from 280 ppm to 290 ppm was observed by the auditors. At the time of the audit the settings at dosing point 1 was 290 ppm free cyanide and at dosing point 2 was 150 ppm free cyanide.

Manual samples and titrations are used as back up and check the TAC 1000 is working correctly.

A WAD 1000 on-line WAD cyanide analyser is installed on the CIP tails line and is monitored to ensure the WAD cyanide does not exceed 50 mg/l.

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Standard of practice 4.3: Implement a comprehensive water management program to protect against unintentional releases.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.3**
 not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.3; implement a comprehensive water management programme to protect against unintentional releases

The operation has developed a comprehensive, probabilistic water balance using commercially available software.

The software shows the dam levels in the event of a 1 in 50 year 24 hr storm event, a 1 in 100 year 24 hr storm event, and the maximum 24 hr storm.

The water balance considers the following in a reasonable manner and as appropriate for the facilities and the environment. The auditors observed the input data sheets for the model.

- a) The rates at which tailings are deposited into the tailings storage facility is included in the model.
- b) A design storm duration and storm return interval that provides a sufficient degree of probability that overtopping of the pond or impoundment can be prevented during the operational life of the facility. The water balance assesses the effect on the TSF of a 1 in 50 year 24 hour storm event (120 mm) and a 1 in 100 year 24 hour storm event (142 mm). The TSF and the RWDs can contain a 1 in 50 year storm without overtopping if the RWDs are kept to be less than 15%. A 1 in 100 year storm event can be contained if they are less than 7% full. The Plant's target for the RWDs is to keep them at <10% full. The Plant Catchment Dam needs to be below 25% to contain a 1 in 50 year storm event and below 16% to contain a 1 in 100 year storm event.
- c) The quality of existing precipitation and evaporation data in representing actual site conditions? The precipitation data is measured on site and updated on an annual basis. The storm events are based on 50 years of data from the closest weather station. The evaporation data is calculated for the site based on Engineer of Record data.
- d) There are stormwater diversion trenches for the Plant, and RWDs. The TSF's are a landraise so there is no run-on. Therefore, the amount of surface run-on is not applicable.
- e) Effects of potential freezing and thawing conditions on the accumulation of precipitation within the facility and the up gradient watershed is not applicable to the site due to the climate of the area.
- f) Solution losses in addition to evaporation, such as the capacity of decant, drainage and recycling systems, allowable seepage to the subsurface, and allowable discharges to

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surface water. Seepage to subsurface is included based on the Engineer of Record data for the Kloof 2 TSF which uses similar TSF Engineering to the Driefontein TSF. There are no discharges to surface water.

- g) The effects of potential power outages or pump and other equipment failures on the emergency removal of water from a facility. Driefontein Gold Plant is linked to 3 power supply sources on a ring main system, reducing the risk of a major power failure over an extended period of time. Water can drain from the TSF to the RWDs by gravity, therefore power is not required for the emergency removal of water from the facility.
- h) The capacity and on-line availability of necessary cyanide treatment, destruction or regeneration systems is not applicable as there is no treatment system on site and no discharge to surface water.
- i) The assumed phreatic surface in the tailings storage facility is included in the model at an assumed level of 50%.

The ponds and impoundments are designed and operated with adequate freeboard above the maximum design storage capacity determined to be necessary from the water balance calculations. The water balance shows the capacity level below which a pond or impoundment needs to be maintained in order to accommodate a 1 in 50 year 24 hour storm event.

The Plant Catchment Dam (PCD) is kept empty in order to accommodate a storm event. If the PCD were to overflow the water would eventually flow to the Wonderfontein spruit. The cyanide concentration of water in the PCD was observed to be less than 0.5 mg/l and therefore the PCD is not a cyanide facility. The PCD has not exceeded its capacity to date.

The operation's operating procedures incorporate inspection and monitoring activities as necessary to implement the water balance and prevent overtopping of ponds and impoundments and unplanned discharge of cyanide solutions to the environment.

RWDs and PCD water levels and subsequently the available freeboards are measured using level indicators, which are displayed on the SCADA system. The RWDs are kept empty to ensure they are able to cope with a storm event, their inspection is included in the daily and weekly inspection of the TSF.

The TSF conducts daily, weekly and quarterly inspections and reviews, which detail the freeboard that is available, ensuring that it is within the legally prescribed limits. The TSF quarterly inspections summarise the data and the reports for 2023 were observed by the auditors stating that the freeboard is within the required limits.

SER.2.4A SPG Reporting, Investigation and Administration of Accidents and Injuries, dated May 2023. This includes a process overview, occurrence of reporting, role of safety department, role of operational staff, role of health services. Annex 3 includes checklists for the responsibilities of the various departments.

An example of an investigation report for an accident on the 30 April 2023 resulting from a truck colliding with a tree due to the failure of the truck's brakes.

The report includes details of the accident, personal details of the injured, training details, investigation team members, locality plan, observations during the inspection, sequence of events, findings, recommendation to prevent similar accidents, The investigation was signed

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off by the relevant Departmental Managers and the attendance register for the investigation meeting 05 May 2023.

The operation measures precipitation, compares the results to design assumptions and revises operating practices as necessary. The precipitation is measured on site and input into the water balance on an annual basis.

The Sibanye Gold Operations Driefontein TSF 1 & TSF 2 – Quarterly Monitoring Report, Q1 2023 by Knight Piesold dated 30 May 2023 includes the following.

The freeboard legal requirements have been recalculated and updated to maintain a minimum freeboard of 1.26 m for TSF 1 and 1.24 m for TSF 2.

- Freeboard: the graph of freeboard showing compliance.
- Rainfall: includes graphs of maximum 24 hr storm per month as well as monthly rainfall trend.
- Conclusion: the TSFs are considered well managed and stable.

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Standard of practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.4**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.4; implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

It has not been necessary for the operation to implement measures (e.g., fencing, filling in collection ditches with gravel, and covering or netting solution in ponds and impoundments) to restrict access by wildlife and livestock to all open waters where WAD cyanide exceeds 50 mg/l as there are no open waters on site where WAD cyanide exceeds 50 mg/l.

The operation can demonstrate that the cyanide concentration in open water in the TSF and solution ponds does not exceed 50 mg/l WAD cyanide.

The PCD WAD cyanide values were observed to be less than 0.5 mg/l WAD cyanide and therefore the PCD is not classified as a cyanide facility.

The RWDs were observed to have a WAD cyanide concentration of less than 0.5 mg/l and therefore they are not classified as a cyanide facility.

The sampling point is the on-line WAD analyser in the Plant. The online WAD 1000 analyser takes samples every 15 minutes and the values are recorded in the SCADA system. The Plant calculates the daily average WAD cyanide and records this data in a spreadsheet. The data for 2023 was observed by the auditors and there were eight exceedances i.e. above 50 ppm WAD cyanide, with the highest being 53.00 mg/l on the 31 October 2023.

The on-line WAD analyser is linked to the SCADA system with an alarm sounding if the concentration of WAD cyanide goes above 45 mg/l. Any exceedance of 50 mg/l will trigger the cyanide dosing pump to stop operating. The Plant then adds ferrous sulphate to the residue prior to the WAD Analyser in order for the WAD cyanide levels to be reduced and the cyanide dosing restarting.

Any exceedance of the 50 mg/l WAD cyanide limit be investigated and documented.

The exceedances were minor as measured by the on-line WAD analyser in the Plant. Additional detoxification of the cyanide is likely to occur before it reaches the TSF reducing the level of WAD cyanide further.

Maintaining a WAD cyanide concentration of 50 mg/l or less in open water is effective in preventing significant wildlife mortalities.

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The TSF and Plant are inspected for wildlife mortalities on a daily basis. No wildlife mortalities were recorded in 2023.

There is no heap leach on site.

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Standard of practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.5**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard 4.5 to implement measure to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The operation does not have a direct discharge to surface water.

In the event of an extreme rainfall event the RWDs can overflow to the Wonderfonteinspruit. If this happens it is treated as an emergency and investigated. This has not happened to date.

The results for the measurement of WAD in the RWDs and PCD for 2023 were observed by the auditors. The results were below 0.5 mg/l WAD cyanide.


The operation has no direct or indirect discharge to surface water.

The surface water is monitored upstream and downstream of the Plant and TSF on a monthly basis. The auditors observed a map of the monitoring locations.

The auditors observed the results of the monitoring for 2023 to date and all of the results were below 0.022 mg/l free cyanide.

No indirect discharge from the operation has caused cyanide concentrations in surface water to rise above levels protective of beneficial use.

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Standard of practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.6**
 not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.6 to implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

The operation implements specific water management and other measures to manage seepage to protect the beneficial use of ground water beneath and / or immediately down gradient of the operation. This includes the following:

The TSF is equipped with underdrains and catchment paddocks to contain any runoff from sides of dam as well as reducing seepage.

The monthly water monitoring results for the RWDs for 2023 are all below 0.5 mg/l WAD cyanide thus the RWDs are not classified as a cyanide facility.

The operation monitors for cyanide in groundwater downgradient of the site and can demonstrate that concentrations of WAD cyanide (or other species of cyanide for which there is a numerical standard established by the applicable jurisdiction) in groundwater at compliance points below or downgradient of the facility are at or below levels that are protective of identified beneficial uses of the groundwater.

The groundwater limit for total cyanide in South Africa is 0.5 mg/l. The results observed since September 2020 for the monitoring of boreholes downgradient of the Plant and the TSF all show that the results are below 0.5 mg/l total cyanide. The monitoring is undertaken on a quarterly basis.

The beneficial uses downgradient of the site are limited to use by the surrounding mines.

The residue slurry from the CIP pump cell circuit can be thickened by the operation and pumped underground as backfill.

The Plant samples every batch in the transfer tanks and titrates for free cyanide. An on-line WAD1000 is used to analyse WAD cyanide in the Stock Tank. The batch is transferred to the mining operation where again the batch is tested for physical parameters. Ferrous sulphate is added to the entire feed stream for the backfill, to ensure that titratable cyanide must be less than 20 ppm WAD cyanide.

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The auditors observed the final Mintek report Mintek REP GF S-Deep BF080817: final, dated 17 August 2008 that concluded based on the available results there was very little risk of HCN gas being present. Mintek is South Africa's national mineral research organisation.

The auditors observed a peer review of the Mintek report dated 19 October 2011. This concluded they are in full support of the conclusions of the Mintek report: stating, that the discharge values of 20 - 30 ppm WAD cyanide are typical and reflective of normal practice.

The backfill test report results from 2019 to date show the WAD cyanide values vary between 24 and 28 mg/l WAD cyanide.

There is no evidence that seepage from the operation has caused cyanide concentrations of groundwater to rise above levels protective of beneficial use. All groundwater monitoring results were below 0.5 mg/l total cyanide, the legal limit for groundwater.

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Standard of practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.7**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.7; Provide spill prevention or containment measures for process tanks and pipelines.

Spill prevention or containment measures are provided for all unloading, storage, and process solution tanks.

The cyanide storage tanks, leach tanks and tailings tanks are conically designed tanks installed on steel uprights such that any leaks can be visibly observed. The tanks are located inside a concrete bund to prevent seepage to the subsurface.

The CIP tanks are flat bottom tanks, elevated and installed on concrete rings on concrete legs inside a concrete bund to prevent seepage to the subsurface.

The elution tanks are placed on steel beams such that any leaks can be visibly observed. The tanks are located inside a concrete bund to prevent seepage to the subsurface.

Secondary containments for cyanide unloading, storage, mixing and process tanks are sized to hold a volume greater than that of the largest tank within the containment and any piping draining back to the tank, and with additional capacity for the design storm event as detailed below.

- Leach 1 bund volume 1 550 m³, largest tank 1 200 m³.
- Leach 2 bund volume 1 578 m³ largest tank 1 200 m³.
- Cyanide storage bund volume 85.31 m³ largest tank 77.6 m³.
- CIP bund volume 138 m³ largest tank 125 m³.
- Backfill and residue bund volume 241.1 m³ largest tank 219.2 m³.
- The elution bund volume is 25.3 m³ and the tank volume 23 m³.

Any overflow from the bunds will report to the concrete lined channels that flow by gravity to the PCD. The results for the measurement of WAD in the PCD for 2023 were observed by the auditors. The results were below 0.5 mg/l WAD cyanide. If WAD measurements in the PCD were to exceed 0.5 mg/l it would be treated as a spill and remediated as detailed in spill clean-up procedures.

Procedures are in place and being implemented to prevent discharge to the environment of any cyanide solution or cyanide contaminated water that is collected in a secondary containment area.

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All of the bunds are equipped with sump pumps returning spillages and water back to the process tanks. The sump pump for the cyanide solution tanks' bund pumps to the leach tanks only, the sump is equipped with a level detector connected to the SCADA system, but the pump needs to be started manually.

Procedure MET.2.3C-SPG Inspect Plant Areas, dated 15 Feb 2023 includes the monitoring of all bund levels which are recorded in the Shiftly Extraction Log Sheet,

The PCD is used for the collection of stormwater and the containment of spillages in an emergency. There are no cyanide process tanks without secondary containment.

Spill prevention or containment measures are provided for all process solution pipelines to collect leaks and prevent releases to the environment. All reagent strength pipelines run across concrete areas connected to bunds acting as secondary containment with flange covers fitted to all flanges.

Reagent strength cyanide lines are included in the PRAGMA planned maintenance system.

Procedure MET.2.3C-SPG Inspect Plant Areas, dated 15 Feb 2023 includes a shiftly inspection for all pipeline leakages, crystallisation, and observation of the general condition.

The TSF line from the Plant to the TSF is composed of steel pipes with High Density Polyethylene (HDPE) lining, placed inside earth containment berms. The ring main pipelines at the TSF are placed adjacent to the slimes dam solution trenches catchment area. All pipes, valves and pumps are part of the PRAGMA planned maintenance system.

TSF Pipe inspections are conducted daily. Any incident is reported on the WhatsApp group. Pipe thickness tests are conducted annually. There are no areas where cyanide pipelines present a risk to surface water.

Cyanide tanks and pipelines are constructed of materials that are compatible with cyanide and high pH conditions. The site inspection verified that all cyanide tanks are constructed of mild steel. The cyanide reagent strength pipelines are made of mild steel as per the Sibanye standard for cyanide reagent strength pipelines. The pipelines within the Plant containing lower strength process solution are constructed either of mild steel or HDPE.

The tailings pipelines are made of mild steel with an internal sleeve of HDPE.

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Standard of Practice 4.8: Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.8**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.8; to implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

Quality assurance and quality control programs were implemented during the construction and substantial modification of all cyanide facilities, however due to the age of the Plant and the transfer of ownership the records are not available.

There is no available quality control and quality assurance documentation or as-built certification for cyanide facility construction, therefore the operation has appointed an appropriately qualified person to inspect those facilities and issued the relevant reports concluding that their continued operation within established parameters will protect against cyanide exposures and releases as detailed below.

The Plant Boiler Makers are trained in the Structural Inspection Maintenance Management System (SIMMS) for Plant Structures. The auditors observed the training material. The training is provided at the Sibanye Academy. Following the successful completion of the training the individuals are certified to undertake structural inspections. The auditors observed the certificate for Kagiso Mashita dated 2 February 2023 - Certificate No. SSA/ENG/3944822.

The certified Boiler Makers undertake an annual inspection of the Plant's structures. The completed inspection for the Cyanide Cage was observed. If any significant deficiency is observed this is communicated to the Sibanye Structural Engineer for further inspection. A report on the recommendation by the Structural Engineer following an inspection of thickener 1 that identified corrosion on the central spindle was observed by the auditors for the Kloof 2 Plant. The recommendation was for repairs, which were undertaken and signed off by the Sibanye Structural Engineer, also observed by the auditors.

The annual structural inspection is included as part of the PRAGMA planned maintenance system and recorded electronically on the system.

A quarterly assessment of the and report on the status of the TSF used by Driefontein Gold Plant i.e. the Leeudoorn Upper and Lower TSF are undertaken by the Engineer of Record, Knight Piesold e.g. Leeudoorn Upper and Lower TSF Quarterly Monitoring Report - R1301-00726/41-A - 20 June 2023. The report included the following; physical integrity, stability

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tailings deposition, rate of rise, freeboard, pool management and penstock, phreatic level trends, underdrain flows, return water dams and seepage, rainfall, environmental, incidents, site visit findings, and action list. - no significant issues were reported.

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Standard of Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 4.9**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 4.9; to implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

The operation has developed the following written standard procedures for monitoring activities. the *Sibanye Cyanide Sampling Procedure* dated August 2023. This is a Group procedure applicable to all Sibanye Plants.

The sampling and analytical protocols have been developed by an appropriately qualified person.

The sampling protocol has been developed using MINTEK (South Africa's national mineral research organisation) procedures by HPJ Pretorius a scientist with an MSc in Environmental Management specialising in water quality. The auditors observed the professional registration card no. 400447/04. The co- Author is Alfonso Le Roux an Environmental Practitioner - the original procedure was reviewed and made Group specific by Sylvester Nkwe, Acting Unit Manager (Environmental).

The Environmental Monitoring Plan includes procedures specifying how and where samples should be taken, sample preservation techniques, chain of custody procedures, shipping instructions, cyanide species to be analysed and quality assurance and quality control requirements for cyanide analyse.

Sampling conditions (e.g. weather, livestock,/wildlife activity, anthropogenic influences, etc.) and procedures are documented in writing. DD Science undertakes the sampling and records field conditions on the sampling record including a column covering weather, field observations, etc.

Monitoring is conducted at frequencies adequate to characterise the medium being monitored and to identify changes in a timely manner. The surface water monitoring is undertaken on a monthly basis. The groundwater samples are undertaken on a quarterly basis. The wildlife monitoring is undertaken on a daily basis.

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Principle 5 – Decommissioning

Protect Communities and the Environment from Cyanide Through Development and Implementation of Decommissioning Plans for Cyanide Facilities.

Standard of practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 5.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 5.1; to plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The operation has developed written procedures to effectively decommission cyanide facilities at the cessation of operations.

The auditors observed *CN-ENV-04 Procedure for Decommissioning of Cyanide Facilities*, dated October 2023. This Procedure adequately addresses decommissioning, which is that aspect of closure that addresses the cyanide remaining on site upon cessation of production activities and prepares the site for its closure and post closure period.

The Procedure includes an implementation schedule detailing the activities to be undertaken for the decommissioning and how long each activity will take starting from Day 1 of the decommissioning process.

The operation reviews its decommissioning procedures for cyanide facilities and revise them as needed every two years.

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Standard of practice 5.2: Establish a financial assurance mechanism capable of fully funding cyanide related decommissioning activities.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 5.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 5.2; to establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

The operation has developed an estimate of the cost to fully fund third party implementation of the cyanide related decommissioning measures identified in the site decommissioning plan.

The auditors observed the closure cost detailed estimate including a line item for cyanide decommissioning undertaken by WSP.

Determination of the 2022 closure costs for the Driefontein Operations dated January 2023 included the Total Plant Demolition estimate and Driefontein Plant cyanide decommissioning line item. The cost estimates are reviewed annually.

The operation has established a financial mechanism approved by the applicable jurisdiction to cover the estimated costs for cyanide related decommissioning activities as identified in the decommissioning plan. It is a legal requirement that financial estimate for decommissioning must be fully funded by the mine.

It was confirmed that the Driefontein Trust Fund, which is part of the Sibanye Trust Fund, has sufficient funds to cover the decommissioning costs. The Trust Fund documentation is signed off by external accountants. The auditors observed the submission letter to the Department of Mineral Resources and Energy (DMRE) detailing the financial provision provided in accordance with the legal requirements.

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Principle 6 – Worker Safety

Protect Workers' Health and Safety from Exposure to Cyanide.

Standard of practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 6.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.1 to identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

The operation has developed procedures describing how cyanide-related tasks such as unloading, mixing plant, operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure including the following.

MET.2.3C-SPG Offload Sodium Cyanide into Bulk Storage Facility, dated 1 April 2021 includes PPE Section 4.3 Inspect and dress up in appropriate compulsory PPE.

MET.2.3D-SPG Perform Buddy Duties and Responsibilities dated October 2019. The procedure describes the role and responsibilities of the Buddy.

MET-2.3D SPG22 Decontaminate Equipment and Components For Reagent And Process Strength Cyanide And Slime, dated August 2020.

MET-2.3C SPG19 Maintenance on Sodium Cyanide Pipelines, dated September 2020.

MET2.3D SPG8 Procedure for Entering and Working In Confined Spaces, dated November 2019. Use is made of permit books including confined space work permit, special work permit, and hot work permit.

MET.2.3D SPG7 Standard Procedure Obtain Permit to Work, dated January 2020.

The procedures require, where necessary, the use of personal protective equipment and address pre-work inspections. The relevant PPE and pre-task inspections are included in each individual procedure. In addition; a mini pre-task risk assessment system is used before any work is undertaken.

The operation solicits and actively considers worker input in developing and evaluating health and safety procedures including the following:

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Daily safety toolbox meetings are undertaken for each shift. Weekly Wednesday Safety and Communication Meetings are undertaken with the auditors observing attendance records. The Life Saving Commitment booklets are issued to all employees. This includes critical health and safety behaviours and forms part of the meeting agenda, taking a different topic each week. Health and Safety Representative meetings are held monthly.

New or revised procedures are discussed and agreed to at all of these meetings.

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Standard of practice 6.2: Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 6.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.2 to operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the

The operation has determined the appropriate pH for limiting the evolution of HCN gas during mixing and production activities.

The pH levels on the SCADA are set at 10.6 at the TAC 1000 with a low level alarm at pH 10.3. It was confirmed that there are Interlocks with cyanide pumps in place stopping the cyanide dosing pumps if the low level alarm at pH 10.3 is activated.

The operation has identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust in excess of 10 parts per million (ppm) (11 mg/m³) on an instantaneous basis and 4.7 parts per million (ppm) (5 mg/m³) continuously over an 8-hour period, as cyanide and require use of appropriate personal protective equipment in these areas or when performing these activities.

The areas that have been identified are at the Cyanide Storage Tanks, the top of the Leach Tanks at the two cyanide dosing points, and at the Elution. There are fixed cyanide monitors at each of these locations. In addition, personal monitors are used by workers on the TSF. A hotspot survey was prepared by the Occupational Hygiene Department dated 25 October 2023. These surveys are undertaken on a quarterly basis. No HCN gas was recorded.

The facility uses monitoring devices in process areas and for activities involving the management of cyanide to confirm that workers are not exposed to hydrogen cyanide gas or cyanide dust exceeding 10 parts per million (ppm) on an instantaneous basis and 4.7 parts per million (ppm) continuously over an 8-hour period, as cyanide.

Driefontein Gold Plant is equipped with seven Draeger Polytron fixed cyanide monitor units: 3 at the Cyanide Storage Tanks, 2 on top of the Leach Tanks (one at each dosing point), 1 at the CIP cells, and 1 at the Final Residue Tank. The fixed monitor first alarm settings at the SCADA is at 3.5 ppm where the supervisor is informed. and the second alarm is at 4.0 ppm where operations cease. Four Drager personal monitors are used with the first alarm again set at 3.5 ppm and the second alarm set at 4.0 ppm.

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Hydrogen cyanide monitoring equipment is maintained, tested and calibrated as directed by the manufacturer, and records are retained. The fixed and personal monitors are calibrated every 6 months. The calibration certificates for 2023 have been retained.

Warning signs have been placed where cyanide is used advising workers that cyanide is present, of any necessary personal protective equipment that must be worn, and that smoking, open flames and eating and drinking are not allowed. The relevant signs are placed at the CIL, the Elution Area/ CIP / Residue Area, the Cyanide Storage Area, and the TSF.

It was confirmed during the site inspection that the Sasol SDS displayed at the liquid cyanide storage area included: "colour: light to dark red due to the incorporation of a dye". The auditors observed during the site inspection that the colour of the liquid cyanide at the dosing 1 point is red due to the incorporation of the dye.

Emergency showers with eye wash fountains and dry powder fire extinguishers are installed at strategic locations on the Plant. Eye wash sprays are designed to diffuse water streams. They are maintained, inspected and tested on a regular basis.

SER.EE.2.4 SPG-32 Fire Extinguisher Standard Procedural Guideline, dated August 2020 was observed detailing checklist, and requiring a monthly inspection sticker as well as annual inspection sticker placed on the unit. The auditors observed the checklists for 2023. The annual service is undertaken by VDS Fire and Safety Appliances. The auditors observed the Fire Register/ Certificate for 2023 dated 28 November 2023.

Emergency Safety Showers are tested and inspected as part of the shiftly plant inspection. There is also a monthly maintenance inspection as part of the planned maintenance system.

Unloading, storage, and process tanks and piping containing cyanide are identified to alert workers of their contents, and the direction of cyanide flow in pipes is shown. Reagent strength cyanide HDPE pipes are labelled indicating their contents and direction of flow. Cyanide dosing points are labelled. Cyanide storage tanks and process solution pipelines are clearly marked and colour coded. The Plant uses a colour coding standard for tanks and pipelines and employees are trained in the standard.

The tailings pipeline is labelled with contents and direction of flow. The return water to the Plant has a WAD cyanide concentration of less than 0.5 mg/l and therefore does not require labelling.

Safety Data Sheets, first aid procedures and other informational materials on cyanide safety is in the language of the workforce and available in areas where cyanide is managed. The official language for the mine is English with all notices and procedures being in English.

The Sasol SDS boards and cyanide first aid procedure are displayed at the cyanide unloading area, the top of the CIL and in the first aid room. The first aid procedure is also included in the emergency response plans.

Procedures are in place and being implemented to investigate and evaluate cyanide exposure incidents to determine if the operation's programs and procedures to protect worker health and safety, and to respond to cyanide exposures, are adequate or need of revising.

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SER.2.4A SPG Reporting, Investigation and Administration of Accidents and Injuries, dated May 2023 includes a process overview, occurrence of reporting, role of safety department, role of operational staff, role of health services. Annex 3 includes checklists for the responsibilities of the various departments.

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Standard of practice 6.3: Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 6.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 6.3; develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

The operation has water, oxygen, a resuscitator, antidote kits, radios, telephones, and alarm systems readily available for use at cyanide unloading, and storage locations and elsewhere in the Plant.

The following was verified by the auditors during the site visit.

A medical station adjacent to the cyanide offloading and storage area is available on site with a section dedicated to cyanide emergency and first aid.

The medical station has the following available:

- 3 cyanide antidotes (TriPac) stored in a fridge, all within the use by date.
- 2 Personal Gas Monitors.
- Cyanide PPE including rubber gumboots, chemical suits, gloves, full facemasks, cyanide canisters, life oxygen packs, responder kits, and spill kits.

The room was in a good clean condition, the PPE are stored in sizes making doffing and donning in the correct sizes easy and quick.

A telephone is available in the emergency room for communication. Radios are used for emergency notification and cyanide emergency man down alarms are placed at strategic places on the Plant.

The medical station is the central facility for cyanide emergencies at the Plant.

A first aid station is available at the top of the leach including PPE and medical oxygen.

There are emergency showers and eye wash at the top of the CIL, the Cyanide Storage Area, and the Elution.

The operation inspects its first aid equipment regularly to ensure that it is available when needed, and materials such as cyanide antidotes are stored as directed by their manufacturer and replaced on a schedule to ensure that they will be effective when needed.

Chemicals 2.3C SPG2 - Offload Sodium Cyanide from Tanker into a Bulk Storage Facility dated April 2021 includes the Sodium Cyanide Offloading Checklist, which is undertaken

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prior to an offloading event. The checklist includes the emergency room checks for first aid equipment as well as the antidote for expiration date. The auditors observed completed checklists dated 20 November, 24 November, and 27 November 2023.

First aid equipment elsewhere in the Plant e.g. oxygen is included in the shiftly inspection undertaken in accordance with Procedure *MET.2.3C-SPG39 Inspect Plant Areas*. The completed checklists for the 01 - 03 December 2023 were observed by the auditors.

The auditors confirmed that the cyanide antidotes (TriPac) are stored in the fridge and are due to expire in June 2024.

The antidote kits are ordered by the Plant from Fountain Hospital. The kits are inspected daily for expiry and ordered a month before expiry to ensure they are delivered in time before expiry.

The Cyanide Offloading Checklist is used to inspect the offloading area including the first aid room that is adjacent to the offloading area, prior to any offloading event.

The operation has developed specific written emergency response plans or procedures to respond to cyanide exposures.

The auditors observed *MET2.3C-SPG50 Emergency Response Plan - Sodium Cyanide* - dated January 2021. Use of cyanide antidotes and the first aid measures required for cyanide exposure is described in the *Met-2.3C SPG14 Cyanide Protocols*, which details the necessary response to cyanide exposure through indigestion, inhalation, and absorption through the skin and eyes.

The operation has its own on-site capability to provide first aid or medical assistance to workers exposed to cyanide.

A fully equipped medical station is situated adjacent to the cyanide offloading area. This is used to stabilise patients until an ambulance arrives, at which time the paramedic can administer the cyanide antidote, as required. The members of the ERT are not authorised to administer the antidote.

A dedicated trained Emergency Response Team (ERT) is in place on every shift made up of 5 members and the Supervisor. Shift teams are trained in first aid cyanide treatment.

Netcare 911 is contracted by Sibanye for the provision of paramedic and ambulance services.

Primary response is from the Plant Emergency Response Team (ERT) with Netcare providing paramedic service and transport to the Fountain Hospital.

The operation has developed procedures to transport workers exposed to cyanide to locally available qualified off-site medical facilities.

Exposed workers will be transported from the site by Netcare 911 ambulance to the Fountain Hospital.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide, dated January 2021 states under Section 6.6. Duties of the Protection services states that the Plant security access gate is opened immediately for the direct vehicle entry of the emergency medical services (EMS) Paramedics, Ambulance Personnel and Surface Fire Fighting Teams.

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Netcare 911 will transport all cyanide patients to the nearest equipped facility based on a clinical assessment of the patient. Fountain Hospital is the closest hospital, with the necessary staff and equipment being only 17.2 km away.

The operation has informed local medical facilities of the potential need to treat patients for cyanide exposure, and the operation has assured itself that the medical facility has adequate, qualified staff, equipment and expertise to respond to cyanide exposures.

Fountain Hospital is fully equipped to handle cyanide patients. This was confirmed during a visit to the Hospital by the Mine Health Department Representative. The Hospital is equipped with; a washing bay, 3 showers., and cyanide antidotes (TriPac) in addition to the usual facilities at a fully equipped hospital that can treat accident and emergency patients.

It was confirmed that the hospital has its own standard procedure for treating cyanide patients - *Procedure AHC-SOP-FPH-ER-02 Management of Patients with Cyanide Poisoning*. The Hospital conducts their own cyanide training and is also equipped with their own cyanide related PPE.

The auditors observed a note to Sibanye gold operations employees stating that Netcare 911 has been appointed as a new service provider for EMS. The auditors observed the contract between Sibanye and Netcare 911 for the provision of emergency medical services dated 14 October 2022.

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Principle 7 – Emergency Response

Protect Communities and the Environment Through the Development of Emergency Response Strategies and Capabilities.

Standard of practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.1; prepare detailed emergency response plans for potential cyanide releases. The operation developed Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents. These include the following.

The operation has developed the following Emergency Response Plans to address potential accidental releases of cyanide and cyanide exposure incidents,

The auditors observed the following.

- *MET2.3C-ERP Emergency Response Plan - Sodium Cyanide*, dated January 2021.
- *SER.EE 2.4B COP Mandatory Code of Practice for Emergency Preparedness and Response*, November 2021.

The Plans consider the potential cyanide failure scenarios appropriate for its site-specific environmental and operating circumstances, including the following, as applicable.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide, dated January 2021 is in place, Section 10 details the Emergency Scenarios and references the relevant procedures as detailed below.

- Catastrophic release of hydrogen cyanide from storage or process or regeneration facilities.
 - *Met 2.3 C - SPG56 Respond to Catastrophic Release of HCN gas.*
- Transportation accidents occurring on site or in close proximity to the operation;
 - *Met 2.3 C - SPG57 Respond to Cyanide Tanker Incidents.*
- Cyanide releases during unloading and mixing;
 - *Met 2.3 C - SPG25 Cleanup Spillages - Reagent Strength Sodium Cyanide.*

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- d) Cyanide releases during fires and explosions;
- *Met 2.3 C - SPG58 Respond to release of cyanide during fire and/ or explosion.*
- e) Pipe, valve and tank ruptures;
- *Met 2.3 C - SPG25 Cleanup Spillages - Reagent Strength Sodium Cyanide.*
- *Met 2.3 C - SPG26 Cleanup Spillages - Slimes and Carbon Containing Process Strength Sodium Cyanide.*
- f) Overtopping of ponds and impoundments;
- *EP-ENV-02 Emergency Preparedness And Response Procedure For Environmental Incidents And Accidents*
- *MET2 3CSP59 Cyanide Water Sampling And Analyses.*
- g) Power outages and pump failures;
- *Met 2.3 D - SPG60 Respond to Power Outages and Pump Failures.*
- h) Uncontrolled seepage;
- *EP-ENV-02 Emergency Preparedness And Response Procedure For Environmental Incidents And Accidents.*
- *MET2 3CSP59 Cyanide Water Sampling And Analyses*
- i) Failure of cyanide treatment, destruction or recovery systems;
There are no cyanide treatment, recovery or destruction systems in place.
- j) Failure of tailings impoundments, heap leach facilities and other cyanide facilities.
- *EP-ENV-02 Emergency Preparedness And Response Procedure For Environmental Incidents And Accidents.*
- *2.3A COP Mandatory Code of Practice for Residue Deposits.*

The planning for response to any transportation related emergencies considers the transportation route, physical and chemical form of the cyanide, method of transport the condition of the road or railway, and the design of the transport vehicle.

The following procedures are in place:

- *Met 2.3 C - SPG57 Respond to Cyanide Tanker Incidents;*
- *Met 2.3 D - SPG53 Emergency Communication;*
- *Sasol Emergency Call Centre Process for Transport and Off-Site Incidents;*
- *Sasol Polymers Chlor Vinyls Business Emergency Response Protocol; and*
- *SSP-S-009 Procedure for the handling of dangerous goods transportation incidents involving Sasol.*

The liquid cyanide transport has been undertaken by Tanker Services since July 2011 and they are responsible for transportation related cyanide emergencies in accordance with their certification to the Code.

The Emergency Response Plans describe the following actions and reference the relevant procedures as detailed below.

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a) specific response actions, as appropriate for the anticipated emergency situations, such as clearing site personnel and potentially affected communities from the area of exposure.

Clearing of site personnel is described in *Met/EJ/0011 Emergency Evacuation in Plant September 2023*

Met-2.3D SPG54 -Emergency Response Plan Section 8.0 External Communication states that communication with the affected or potentially affected communities will be coordinated if possible with the Local Governing Body, but must be completed promptly to ensure the communities are kept aware of potential or existing hazards. Any communication must be pre-approved by the Emergency Manager.

b) use of cyanide antidotes and first aid measures for cyanide exposure.

Use of cyanide antidotes and first aid measures for cyanide exposure is described in the *Met-2.3C SPG14 Cyanide Protocols*.

c) control of releases at their source.

Control of releases at their source, containment, assessment, mitigation and future prevention of releases are described in *Met-2.3 C - SPG25 Clean Up Spillages - Reagent Strength Sodium Cyanide*, dated December 2020. *.3 D - SPG26 Clean Up Spillages - Slimes and Carbon Containing Process Strength Sodium Cyanide* dated December 2020.

d) containment, assessment, mitigation and future prevention of releases.

Met-2.3 C - SPG25 Clean Up Spillages - Reagent Strength Sodium Cyanide, dated December 2020. *.3 D - SPG26 Clean Up Spillages - Slimes and Carbon Containing Process Strength Sodium Cyanide* dated December 2020.

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Standard of practice 7.2: Involve site personnel and stakeholders in the planning process.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.2; involve site personnel and stakeholders in the planning process.

The operation has involved its workforce and stakeholders, including potentially affected communities, in the cyanide emergency response planning process.

The workforce is involved through a number of different meetings all of which will address the emergency response planning process at some time. These meetings include; daily safety toolbox meetings, weekly Wednesday Safety and Communication Meetings, and Health and Safety Representative meetings that are held monthly.

The operation has made potentially affected communities aware of the nature of their risks associated with accidental cyanide releases, and consulted with them directly or through community representatives regarding appropriate communications and response actions.

The operation has identified external entities having emergency response roles, and involved those entities in the cyanide emergency response planning process.

The operation also engages in consultation or communication with stakeholders to keep the Emergency Response Plan current.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide - dated January 2021, Section 6.14 External Responders identifies medical facilities, police, and fire departments as external entities having emergency response roles. The only role that communities are identified as having are to evacuate in the event of a TSF failure or major cyanide spill.

Fountain Hospital was visited by the Mine Health Department Representative in 2023 to discuss the capabilities of the hospital and the cyanide emergency response planning process (personal communication). It was confirmed that the hospital has its own standard procedures for treating cyanide patients - Procedure *AHC-SOP-FPH-ER-02 Management of Patients with Cyanide Poisoning*. The Hospital conducts their own cyanide training and is also equipped with their own cyanide related PPE.

The auditors observed a note to Sibanye gold operations employees stating that Netcare 911 has been appointed as a new service provider for EMS. The auditors observed the contract between Sibanye and Netcare 911 for the provision of emergency medical services dated 14 October 2022. Netcare 911 is involved in the mock drills.

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The auditors observed the minutes of meetings with communities dated 17 Oct 2022 including the attendance register and organisations attending. Discussions including questions and answers were recorded.

The auditors observed a media briefing document for radio interviews for Gold FM dated 14 July 2023, which related to the TSF and emergency preparedness.

Engagement regarding the emergency response planning process includes planned meetings with the municipalities. These meetings included representatives from the police and fire departments. The auditors observed the schedule of meetings for 2023.

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Standard of practice 7.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.3 to designate appropriate personnel and commit necessary equipment and resources for emergency response.

The cyanide-related elements of the *MET2.3C-ERP Emergency Response Plan - Sodium Cyanide* - dated January 2021 (the Plan) includes the following.

- a) Designation of primary and alternate emergency response co-ordinators who have explicit authority to commit the resources necessary to implement the Plan.

The Plan identifies the primary emergency response coordinator as the Metallurgical Manager. The alternate emergency response coordinator is identified as the Plant Manager. The Plan states that the Incident Commander will have the authority to commit the required resources.

- b) Identification of Emergency Response Teams.

Plant Emergency Response Team Members (ERT) are identified on notice boards within the Plant as observed by the auditors. This is composed of 5 operators and 1 Supervisor per shift.

- c) Requirement for the appropriate training of emergency responders.

Training for ERT members is detailed on the Plant Training Matrix as observed by the Auditors.

- d) Includes call-out procedures and 24-hour contact information for the co-ordinators and emergency response team members.

The Plan details the call out procedures under Section 6.4 Plant ERT Members Duties and emergency contact information in Annexure B.

- e) Specifies the duties and responsibilities of the co-ordinators and team members.

The Plan details the duties and responsibilities of the coordinators and ERT Members in Section 6.0 Emergency Team.

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- f) Lists emergency response equipment, including personal protection gear, available on-site.

The Plan in Section 6.12 Emergency Cyanide Equipment lists the emergency response equipment available.

- g) Include procedures to inspect emergency response equipment to ensure its availability.

Each Station that contains emergency response equipment is inspected daily using the appropriate checklist as stated in the Plan, Section 6.13.2 Inspection Procedure. The Cyanide Offloading checklist inspects the offloading area including the first aid room that is adjacent to the offloading area, prior to any offloading event. The auditors observed completed checklists dated 3 - 6 October 2023.

The auditors observed the Netcare 911 Ambulance Operational Readiness Check Vehicle BA12, dated 11 October 2023 including external and internal checklists which includes medical equipment. Inspections are conducted shiftly.

- h) Describe the role of external responders, medical facilities and communities in the emergency response procedures.

The Plan details the Role of Outside Responders in Section 6.14.

The operation has confirmed that external entities with roles and responsibilities identified in the Emergency Response Plan are aware of their involvement and are included as necessary in mock drills or implementation exercises.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide - dated January 2021 identifies medical facilities, police, and fire departments as external entities having emergency response roles.

Fountain Hospital was visited by the Mine Health Department Representative in 2023 to discuss the capabilities of the hospital and the cyanide emergency response planning process (personal communication). It was confirmed that the hospital has its own standard procedures for treating cyanide patients - *Procedure AHC-SOP-FPH-ER-02 Management of Patients with Cyanide Poisoning*. The Hospital conducts their own cyanide training and is also equipped with their own cyanide related PPE.

The auditors observed a note to Sibanye gold operations employees stating that Netcare 911 has been appointed as a new service provider for EMS. The auditors observed the contract between Sibanye and Netcare 911 for the provision of emergency medical services dated 14 October 2022.

Netcare 911 and the Fountain Hospital are involved in full chain drills. The auditors observed an emergency cyanide drill report from the Plant to the Fountain Hospital on 6 October 2023, which also included Netcare 911.

The Police and Fire Department would be involved in any emergencies that occur outside the mine. They have not been involved with any mock drills to date. A disaster management committee is in place which includes the mine, the police and fire department, amongst others. It is the role of the municipality to co-ordinate the response to any disaster.

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Standard of practice 7.4: Develop procedure for internal and external emergency notification and reporting.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.4**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.4 to develop procedures for internal and external emergency notification and reporting.

The Plan includes procedures and contact information for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency.

The Plan details the call out procedures under Section 6.0 Emergency Team for notifying management, regulatory agencies, external response providers and medical facilities of the cyanide emergency. Emergency contact information is in Annexure B.

The Plan includes procedures and contact information for notifying potentially affected communities of the cyanide related incident and any necessary response measures and for communication with the media.

The Plan Section 6.9 Media Liaison states that the Media Liaison Officer is the only authorised spokesperson authorised to deal with the Media. Communications with communities will be by the Community Engagement Department unless there is a threat to a beneficial water source and then the Sustainable Development Manager will immediately inform the relevant parties as described in Section 6.9 Media Liaison.

The operation has a procedure for notifying the ICMI of any significant cyanide incidents, as defined in the ICMI's Definitions and Acronyms document.

The Plan, Annexure A : Notification of Significant Cyanide Incident to the International Cyanide Management Institute, describes the procedure.

There have been no significant cyanide incidents to date.

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Standard of practice 7.5: Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 7.5**
 not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.5 to incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

The operation is in full compliance with Standard of Practice 7.5 to incorporate in response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

The Plan describes specific remediation measures as appropriate for the likely cyanide release scenarios as detailed below.

- a) Recovery or neutralisation of solutions or solids?
- b) Decontamination of soils or other contaminated media?
- c) Management and/or disposal of spill clean-up debris?

The necessary measures are described in the following procedures.

Met 2.3 C – SPG25 Clean up Spillages - Reagent Strength Sodium Cyanide.

Met 2.3 C – SPG26 Clean up Spillages - Slimes and Carbon Containing Process Strength Sodium Cyanide, dated October 2023.

This includes the clean-up of cyanide spills in the Plant and outside the Plant perimeters to the TSF. All spillages are to be cleaned up physically without the use of chemicals. The total cyanide must be less than 0.5 mg/l in the cleaned-up area for the removal of contaminated material to be complete (as stated in Section 4.14 in SPG26). The contaminated material will be assessed to determine where it can be put back into the process. These procedures include a description of how the soil samples are to be taken and what analysis will be performed.

- d) Provision of an alternate drinking water supply?

The Plan, Section 6.9 Media Liaison states that if there is a threat to a beneficial water source the Sustainable Development Manager will immediately inform the relevant parties who will arrange to supply potable drinking water.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide - dated January 2021, Section 9.2 Surface Water Protection states that chemicals are not to be used to neutralise cyanide

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spilled into surface water including; sodium hypochlorite, ferrous sulphate, and hydrogen peroxide.

Met 2.3 C – SPG26 Clean up Spillages - Slimes and Carbon Containing Process Strength Sodium Cyanide, dated October 2023 states that no attempt should be made to neutralise the contaminated soil with any chemical including Ferrous Sulphate. Sodium hypochlorite and Ferrous Sulphate must never be used to treat cyanide that has been released into natural surface water bodies. Both of these chemicals are toxic to aquatic life. Hydrogen peroxide is not kept on site.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide - dated September 2023, Section 9.3 Environmental Monitoring states that the potential need for monitoring is identified in *2.3C SPG55 Cyanide Water Sampling and Analysis Procedure*, which includes sampling methodologies and parameters. The auditors observed the map showing the various sampling locations, which would be used as possible sampling locations in the event of a release.

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Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is in substantial compliance with Standard of Practice 7.6

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 7.6; to periodically evaluate response procedures and capabilities and revise them as needed.

The operation reviews and evaluates the cyanide related elements of its Emergency Response Plan for adequacy on a regular basis.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide - dated January 2021, Section 4.0 Evaluation of Emergency Response Plan for Cyanide states that the Plan will be reviewed; on an annual basis, if any changes occur, after each cyanide related emergency, or after each emergency drill where deficiencies in the Plan were identified. If the Plan is reviewed but no changes are required an updated version is not created.

Mock cyanide emergency drills are conducted periodically.

MET2.3C-ERP Emergency Response Plan - Sodium Cyanide - dated January 2021, Section 7.0 Emergency Exercises details a schedule for mock drills must be created.

The following were observed by the auditors:

The mock drill schedule for 2023, with one drill per quarter that includes a Man Down Cyanide Drill and a Reagent Strength Cyanide Spill. A full chain drill to the hospital was undertaken on the 6th June 2023.

The drill reports include the following:

- Photographs of the drill;
- A timeline table including events and time. This showed that medical oxygen was administered within 3 minutes;
- Learning points include shortfalls; and
- Attendance register.

No cyanide incidents have occurred at the facility. No actual cyanide related incidents requiring implementation of the Emergency Response Plan or mock drills identifying deficiencies in the Plan have occurred.

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Principle 8 – Training

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner.

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

in full compliance with

The operation is in substantial compliance with Standard of Practice 8.1

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.1; train workers to understand the hazards associated with cyanide use.

The operation trains all personnel who may encounter cyanide in cyanide hazard recognition.

All Plant and TSF staff receive induction training including cyanide awareness training. An 80% pass mark is required. Asset protection (security) receive the induction including cyanide awareness. Permanent Contractor staff receive induction including cyanide awareness. All TSF staff are trained in cyanide awareness and cyanide first aid by the Plant.

This training adequately addresses cyanide hazards, such as the cyanide materials present at the operation, the health effects of cyanide, the symptoms of cyanide exposure and the procedures to following the event of exposure.

The auditors observed the Training Matrix and confirmed that the above that received induction and cyanide awareness training. The records are kept of the tests and attendance registers.

Cyanide induction refresher training is conducted when returning from annual leave. If staff are overdue by 18 months they can be blocked from entry at the gate.

Training records are retained in hard copy for each person for the life of mine.

The auditors sampled the hardcopies of the Plant training records and Sibanye Stillwater Academy Simplicity system that tracks the training undertaken at the Academy.

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Standard of practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 8.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.2; Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

The operation trains workers to perform their normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases.

Practical training starts when the person is put on shift and receives on the job training under the supervision of the Team Supervisor. Standard Procedure Guidelines (SPG) are used for the task training.

The Supervisor conducts a Planned Task Observations (PTO) and a Task Risk Assessment (TRA) is used to determine if the operator is competent. If gaps are found additional training is provided.

Once found competent using the PTO by the Supervisor the operator will be allowed to work unsupervised. PTO's are conducted to determine competency before operating a shift or appointment as a cyanide offloader. PTO's are conducted as per a formal program (the target is two PTO's a week).

The auditors observed the Training Matrix, which includes level 2 training at the Academy e.g. leach, elution, CIP, milling etc. Engineering training undertaken externally at No. 7 Shaft is included in the matrix.

The Simplexity software program at the Academy is linked to the training matrices and records of all training done at the Academy. The program includes external emergency response training undertaken by Terisa Cierenberg.

Training at the TSF is based on a practical session by SSMS using the TSF procedures as guidelines. Determining competence is through PTOs.

The training elements necessary for each job involving cyanide management are identified in the SPGs that are used as training material. All Plant operating personnel are trained on all SPG's required to perform jobs involving cyanide management.

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Training at the TSF is based on a practical session by SSMS using the TSF procedures as guidelines.

The auditors observed the SPGs attached to the training records demonstrating the training elements that were used.

Task training related to cyanide management activities is provided by an appropriately qualified person.

Task training is performed by the Plant Trainer, S Sangoni and on the job training is undertaken by experienced Plant Supervisors. S Sangoni has completed the Assessor Learning Programme on 29 June 2022, together with 13 years gold plant experience.

Emergency Response training is undertaken by Teresa Cierenberg who is registered with the Health Professions Council of South Africa (HPCSA), and has 16 years' experience in cyanide emergency training and procedures. She is also a qualified Intermediate Life Support Paramedic.

Training for the TSF is undertaken by Aubrey Fourie of SSMS, who has 20 years' experience on TSFs.

All workers are trained prior to working with cyanide. All Plant and TSF staff receive induction training including cyanide awareness training. An 80% pass mark is required. Asset protection (security) receive the induction including cyanide awareness. Permanent Contractor staff receive induction including cyanide awareness. All TSF staff are trained in cyanide awareness and cyanide first aid by the Plant.

The records are kept of the tests and attendance registers.

Refresher training on cyanide management is provided to ensure that employees continue to perform their jobs in a safe and environmentally protective manner. Cyanide induction refresher training is conducted when returning from annual leave. Staff overdue by 18 months since their last refresher can be blocked from entry at the gate. Work task refresher training is provided as required depending on the outcome of the PTOs, such that is the tasks as being undertaken adequately no refresher training is required.

Records are retained throughout an individual's employment documenting the training they have received and including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

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Standard of practice 8.3: Train appropriate workers and personnel to respond to worker exposure and environmental releases of cyanide.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 8.3**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 8.3; train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

All cyanide unloading, mixing, production and maintenance personnel are trained in the procedures to be followed if cyanide is released, including decontamination and first aid procedures.

All Plant employees receive cyanide awareness, emergency response (including procedures to be followed in the event of a cyanide release) and preparedness training as part of the Emergency Response Plan including cyanide first aid, decontamination procedures, as observed in the training matrix by the auditors, and the use of necessary response equipment.

A dedicated trained ERT is in place on every shift, which is made up of 5 members from the shift and the Supervisor. Emergency Response Coordinators and members of the ERT are trained in the procedures included in the Emergency Response Plan regarding cyanide, including the use of necessary response equipment.

The operation has made external responders, such as local fire brigades and emergency medical services familiar with those elements of the Emergency Response Plan related to cyanide.

Fountain Hospital was visited by the Mine Health Department Representative in 2023 to discuss the capabilities of the hospital and the cyanide emergency response planning process (personal communication). It was confirmed that the hospital has its own standard procedures for treating cyanide patients - *Procedure AHC-SOP-FPH-ER-02 Management of Patients with Cyanide Poisoning*. The Hospital conducts their own cyanide training and is also equipped with their own cyanide related PPE.

Netcare 911 and the Fountain Hospital are involved in full chain drills. The auditors observed an emergency cyanide drill report from the Plant to the Fountain Hospital on 6 October 2023.

The Police and Fire Department would only be involved in any emergencies that occur outside the mine. They have not been involved with any mock drills to date. A disaster management committee is in place which includes the mine, the police and fire department, amongst others. It is the role of the municipality to co-ordinate the response to any disaster.

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Refresher training for response to cyanide exposures and releases is regularly conducted. Cyanide induction refresher training is conducted when returning from annual leave.

Records are retained documenting the cyanide emergency response training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

The auditors sampled the hardcopies of Plant training records and Sibanye Stillwater Academy Simplicity system that tracks the training undertaken at the Academy.

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Principle 9 – Dialogue and Disclosure

Engage in Public Consultation and Disclosure.

Standard of practice 9.1: Promote dialogue with stakeholders regarding cyanide management and responsibility address identified concerns.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 9.1**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 9.1; provide stakeholders with the opportunity to communicate issues of concern.

The operation provides stakeholders with information on its cyanide management practices and engage with them regarding their concerns. A stakeholder forum is in place and forms the basis of dialogue with stakeholders and communities.

Sibanye uses a position paper on cyanide awareness for inclusion in the communication strategy (this includes, environment, safety etc.). The auditors observed the stakeholder meeting schedule for 2023, which included municipalities, schools, and communities.

Presentations are provided at local schools. The auditors observed a presentation regarding the TSF and emergency preparedness which is used during stakeholder meetings. The attendance registers for presentations at Greenspark Primary School and Letsasing Combined School were observed by the auditors dated 17 May 2023.

The auditors observed minutes of meetings with local communities dated 17 Oct 2022 including the attendance register. Discussions and recommendations were recorded including questions and answers.

The auditors observed a briefing document for radio interviews for Gold FM dated 14 July 2023 regarding the TSF and emergency preparedness. This interview was in Afrikaans and English.

The auditors observed a poster produced by the Plant that is handed out to communities. The poster includes process flow diagram, information on what is cyanide, uses of cyanide, how cyanide is used on the plant, risks of using cyanide, and ICMI information. An emergency contact number is also included.

The auditors observed the Kromdraai River Catchment Meeting Minutes for 30 Aug 2022, including the attendance register and agenda.

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A disaster management committee is in place which includes the mine, the police and fire department, amongst others. It is the role of the municipality to co-ordinate the response to any disaster. The auditors observed a Memorandum of Understanding with regards to the formation of this committee. The first meeting was undertaken on 12 October 2023.

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Standard of practice 9.2: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

in full compliance with

The operation is in substantial compliance with **Standard of Practice 9.2**

not in compliance with

Summarise the basis for the findings/deficiencies identified.

The operation is in full compliance with Standard of Practice 9.2 to make appropriate operational and environmental information regarding cyanide available to stakeholders.

The operation has developed written descriptions of how their activities are conducted and how cyanide is managed and these descriptions are available to communities and other stakeholders.

The operation has created a poster produced by the Plant that is handed out to communities. The poster includes; a process flow diagram, information on what is cyanide, uses of cyanide, how cyanide is used on the Plant, risks of using cyanide, and ICMI information. An emergency contact number is also included.

The operation has disseminated information on cyanide in verbal form where a significant percentage of the local population is illiterate. Presentations are provided to schools and communities as detailed in 9.1. These are presented verbally in the local language.

The operation makes information publicly available on confirmed cyanide release or exposure incidents.

Any cyanide releases or exposure incidents are reported to the Department of Mineral Resources and Energy and the Department of Water and Sanitation as required by the operation's authorisations. The DMRE and DWS report selectively on repeated or critical incidents.

Any incidents are reported in the Annual Integrated Report that is available on the Sibanye Stillwater website. This includes details of the operation at which the incident occurs. The auditors observed the following in the 2022 Report:

- environmental incidents that occurred in 2022, which included an incident from the Beatrix Mine (overflow of mine stormwater pond) and the Stillwater Mine (spillage of tailings); and
- safety statistics and reporting on incidents including fatalities that occurred in 2022. Cyanide exposure incidents would be included in the report.

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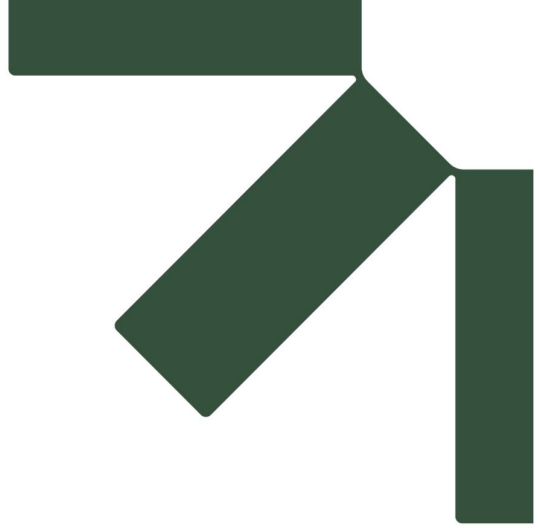


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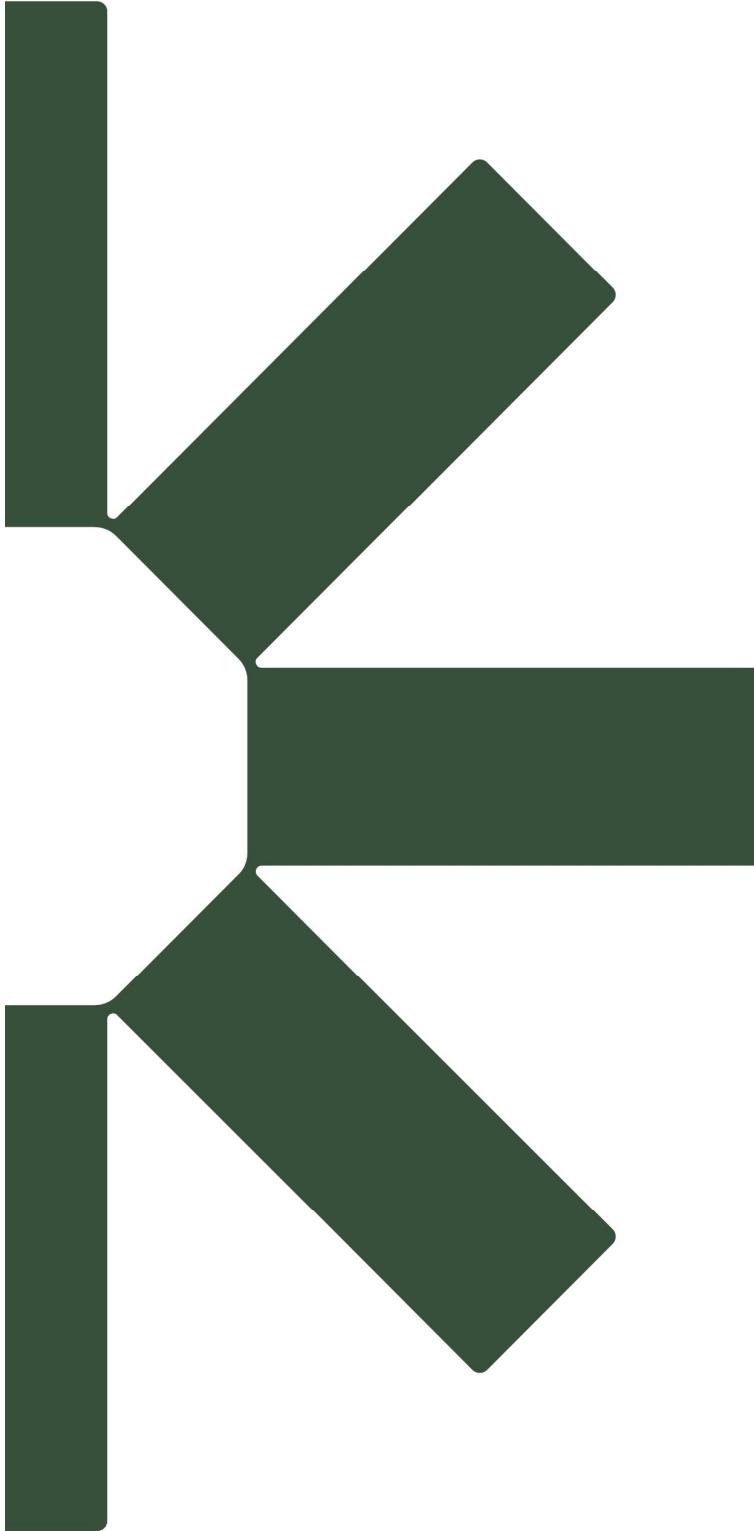
24 June 2024

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