

SIBANYE-STILLWATER SUSTAINABILITY GROUP MINIMUM STANDARD - HUMAN RIGHTS



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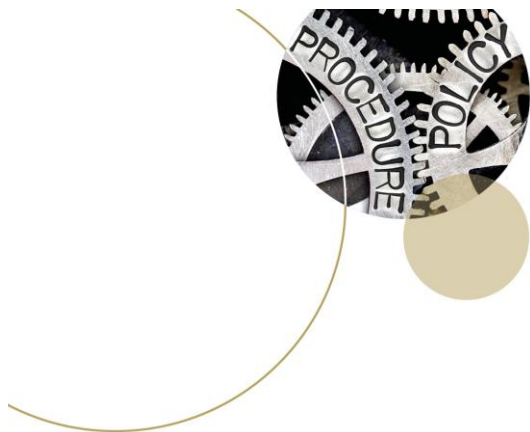
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This Group Standard sets the minimum requirements to monitor, assess and manage human rights and related issues within the Group. This Standard conforms to and aligns to the specific requirements and commitments in the Group Sustainability Policy and Human Rights Policy, respectively. The Standard is aligned to global human rights frameworks including the United Nations Guiding Principles on Human Rights (UNGPs), Universal Declaration of Human Rights (UDHR), the International Labour Organization Fundamental Rights of Work and the National Actions on Business and Human Rights, amongst others.

1. Scope

The scope of this Standard is applicable to all Sibanye-Stillwater regions and operations. It applies to all employees, officials and directors of Sibanye-Stillwater as well as any entity that is controlled or managed by Sibanye-Stillwater. In addition, it applies to Sibanye-Stillwater's vendors, consultants, contractors, and other types of business partners. It is applicable to all sites and in all phases of the mine life cycle, including exploration, design, construction, operation and closure, as well as to our minerals and metals and other processing and recycling facilities.

2. Planning and design

The planning and design for the implementation of this Group Minimum Standard by the entire organisation, shall involve the following key steps and processes:

- **Stakeholder Mapping and Engagement**
 - 2.1 The sites/regions shall identify internal stakeholders (employees, management, Board and external stakeholders - local communities, Indigenous Peoples, Non-Governmental Organizations, governments, suppliers, etc.)
 - 2.2 Conduct consultations to understand human rights concerns, including through focus groups, surveys and public meetings/townhalls.
- **Human rights risk assessment**
 - 2.3 The sites/regions shall perform a baseline assessment to identify potential human rights risks, including but not limited to, forced labour, child labour in supply chains and/or contractors, environmental degradation or displacement.
 - 2.4 Undertake a site specific or project specific human rights risk assessment that can be used as baseline information for further development and/or alignment to human rights practices, standards and frameworks. human rights alignment and practices.
- **Grievance and Complaints Mechanism as it relates to human rights**
 - 2.5 The sites/regions shall ensure that the approved grievance and complaints mechanism to be used/utilised to report on human rights is socialized with all stakeholders, including employees, in a language that they understand.
 - 2.6 The sites/regions shall ensure grievance and complaints mechanisms should be accessible to all stakeholders, and that it is transparent and culturally appropriate.
 - 2.7 The sites/regions shall monitor, track and report annually on human rights grievances and complaints: closed, open and those that are deferred for mediation.





- 2.8 The sites/regions shall update the grievance and complaints mechanism based on stakeholder feedback, audits and emerging best practices as it relates to human rights.

3. Implementation and management

The responsibilities of regions and operations/sites towards human rights within the group include but are not limited to the following:

- 3.1 All sites shall conduct an internal human rights self-assessment on a biennial (two-yearly) basis, and the findings/outcomes/recommendations of this self-assessment shall be addressed as part of the site/regional risk management and related processes;
- 3.2 All sites shall commission and conduct independent third-party human rights due diligence (HRDDs) assessments including for the entire supply chain, at least every five (5) years to identify emerging human rights risks, assess conformance to the company's human rights policy, and identify any human rights breaches across all operating sites in the region;
- 3.3 All sites shall assess the outcomes and remedies in response to gaps identified through the internal self-assessment and the independent human rights due diligence (HRDD) and develop and approve an action plan to close the gaps.
- 3.4 Update action plans on a regular basis and closed-out actions and any other risks associated with its execution;
- 3.5 Submit quarterly status reports on HRDD actions plans, human rights violations, risks and associated mitigation strategies to Group Sustainability for reporting to the Board.

4. Performance monitoring, assurance and reporting

- 4.1 The sites shall ensure that human rights action plans are developed with timelines and approved by responsible Departmental leads and/or site management
- 4.2 Departmental leads and/or site management assigned to action plans shall ensure consistent and timely reporting on progress made, challenges and remedial actions undertaken at site/operations.
- 4.3 Quarterly reporting to Group Sustainability by Departmental leads and/or site management on their actions plans to enable timely updates on human rights issues on all relevant reports.
- 4.4 Sites to ensure that for every human rights-related consultation/engagement; minutes and attendance registers and other records shall be kept.
- 4.5 Monitor and record all annual human rights training interventions and participants and report on it where relevant.





5. Terms and Definitions

Term	Definition
Free, Prior and Informed Consent (FPIC)	FPIC is human rights norm derived from various foundational rights vested in Indigenous Peoples, and it operates as a process that safeguards Indigenous Peoples' substantive rights, including their rights to lands, resources or cultural heritage
Human Rights	Basic international standards aimed at security dignity and equality for all. Every human being is entitled to enjoy them with discrimination. These rights are all interrelated, interdependent and indivisible.
Human Rights Due Diligence	Human rights due diligence is an ongoing risk management process that a company undertakes in order to identify, prevent, mitigate and account for how it addresses its adverse human rights impacts. It includes four key steps: assessing actual and potential human rights impacts; integrating and acting on findings; tracking responses; and, communicating about how impacts are addressed.
Human Rights Impacts	Human rights impacts occur when an action removes or reduces the ability of an individual to enjoy his or her basic rights. Human rights impacts can either have occurred or be on-going or be potential human rights impacts in the future, which are also referred to as human rights risks.
Human rights risks	A company's human rights risks are any risks that its operations may lead a transgression of human rights impacts and people's dignities. This is separate from any risks that involvement in human rights impact pose to the enterprise, although the two are increasingly related.

6. Reference Documents

- Sibanye-Stillwater Group Human Rights Policy
- Sibanye- Stillwater Sustainability Policy
- Sibanye-Stillwater Sustainability Framework
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact Principles
- ICMH Human Rights Due Diligence Guidelines
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Voluntary Principles on Business and Human Rights

