

Annual Report on the Implementation of the World Gold Council's Responsible Gold Mining Principles



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The indigenous Umdoni tree (Syzygium cordatum) symbolizes the following. Our roots, our CARES values, are at the heart of all that we do, the decisions we make and how we conduct our business. These values are enshrined in our Code of Ethics and form the basis of the organisational growth and culture rejuvenation programme currently underway. The trunk of our tree represents our workforce, which supports Sibanye-Stillwater and symbolises its strength. Through the trunk of the tree and into its branches, our values and employees work together and support each other to ensure delivery on our strategy via our key operating drivers – safety, health and wellness, costs, quality and volume. The leaves of the tree represent our stakeholders – all those with whom we engage – both internally and externally – while conducting our business. The results and outcomes of all that we do are represented by the fruit and seeds of the Umdoni tree. In line with our vision, this is the value we ultimately aim to create for stakeholders. These fruits are dependent on the Company having a sustainable business and each of the stakeholders doing their part in creating value.

1 Commitment to the RGMP's

Sibanye-Stillwater takes our responsibility to produce gold in a responsible manner seriously. In order to demonstrate this commitment, the company has endorsed the Responsible Gold Mining Principles (the "Principles" or "RGMPs") developed by the World Gold Council ("WGC").

In conforming to the Principles, we have:

- Developed and implemented policies, systems, processes and controls to ensure that the company conforms with the Principles;
- Disclosed information that helps external stakeholders understand how conformance with the Principles is achieved:

- Disclosed instances or events which have given rise to a situation of non-conformance and the steps that will be taken to remedy the situation; and
- Secured independent assurance over the disclosures and management statements to ensure stakeholder confidence and credibility in the process and conclusions.

2 Boundary for RGMP implementation

The boundary for implementing the RGMPs includes all gold mining and gold processing operations over which the company has direct control. This is consistent with the reporting boundaries that we publicly disclose in our 2020 Integrated Annual Report. Gold operations include, as per below, Kloof, Driefontein, Cooke Surface and Beatrix operations. DRDGold was excluded in the scope of this review.

Sibanye-Stillwater is the second-largest producer of gold from South Africa. Globally, it is also the largest primary producer of platinum and rhodium and the second-largest palladium producer. The company operates a mine to market business in the PGM section.

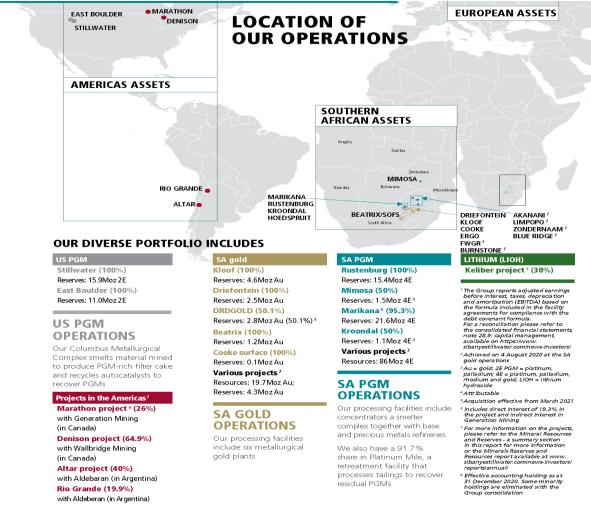


Figure 1 Sibanye-Stillwater operations and project (Please refer to p5 of the 2020 IAR for detail)

3 Sibanye-Stillwater's description of progress towards / achievement of conformance with the Principles

Sibanye-Stillwater strives to conform to the principles of the WGC RGMPs, with areas of improvement identified and subsequent actions plans being identified and being implemented to ensure improvement in the systems, processes and policies. For more information regarding conformance and action plans in terms of the 51 requirements of the WGC RGMPs please refer to the table below.

RGMP Principle	Supporting policies and strategic documentation	Self- assessment and conformance status Meets / Partially meets	Management disclosures and detail to self assessment and conformance status	Action plans in place to address gaps identified / Improvements being implemented
Legal Compliance 1.1 As a minimum expectation, we will comply with applicable host and home country laws and	Code of Ethics Ethics and Corporate Governance Policy	Meets	Sibanye-Stillwater subscribes a zero-tolerance for regulator non-compliance, through our Code of Ethics, for which dedicated compliance officers appointed at the US and SA operations have responsibility.	
relevant international law and will maintain systems to deliver this objective.	Statement		Sibanye-Stillwater subscribes to a legal service informing the compliance officers of changes to the relevant legislation, which is in turn communicated to the relevant disciplines.	
			Refer to Corporate Governance section on p123 of the 2020 Integrated Annual Report (IAR).	
Code of conduct 1.2 We will maintain a code of conduct to make clear the standards with which we expect our employees, and those with whom we do business, to comply. We will actively promote awareness of the code and implement systems to monitor and ensure compliance.	Code of Ethics Disciplinary Code of Conduct	Meets	Sibanye-Stillwater maintains a code of conduct to make clear the standards with which we expect our employees, contractors, suppliers and those with whom we do business, to comply. We actively promote awareness of the code and implement systems to monitor and ensure compliance. Please refer to our Code of Ethics at: https://www.sibanyestillwater.com/about-us/governance/	

Combatting bribery and corruption 1.3 We will put in place controls to combat: bribery and corruption in all its forms: conflicts of interest: and anti-competitive behaviour by employees, agents or other company representatives.

Code of Ethics
Disciplinary Code of
Conduct
Fraud Response
Plans
Security Policy
Ethics and
Corporate
Governance Policy
Statement

Meets

Our approach to bribery and corruption is governed by our CARES values and covered in our Code of Ethics. We continue to strengthen our focus to combat bribery and corruption through the review of our approval framework together with appropriate policies and procedures. For more on our approach to bribery and corruption, see Code of Ethics in the Corporate governance section of the 2020 IAR.

Our Code of Ethics requires the reporting of any contraventions to and instances of non-compliance with relevant legislation and regulations. Supported by a whistle-blowing policy, the Code of Ethics includes procedures to address corruption and bribery that are aligned with the related UNGC principles. In terms of suppliers, processes are also in place to ensure compliance with our ESG requirements and Code of Ethics. For further details, see Social upliftment and community development: page 238 in the 2020 IAR.

To facilitate the reporting of non-compliance, we have two toll-free lines – one for South Africa and one for the US. Employees, suppliers and customers can use the toll-free lines to report irregularities and misconduct without fear of victimisation. Whistle-blower reports, which are anonymous and confidential, are managed by Protection Services. These reports are reviewed by the Audit Committee and the Social, Ethics and Sustainability Committee.

As per the Companies Code of Ethics, King IV, the Companies Act, 2008 (as amended), the JSE Listings Requirements, the NYSE Listed Company Manual and other relevant laws recommendations, directors and prescribed officers are required to submit a declaration of all material financial, economic and other interests held by them. The declarations are undertaken annually, or at any time when there are material changes to their circumstances, by supplying to the Company a declarations of interest schedule or declaring through the employee self-service system. In addition, at every executive or Board-related meeting, every member is required to declare any conflicts of interest in respect of any matters on the gaenda.

Refer to the Corporate Governance section on p109 of the 2020 IAR for more detail on Whistleblower reports on non-compliance, bribery and corruption as well as details on Conflicts of interest, closed periods and price-sensitive share trading.

Political contribution 1.4 We will disclose the value and beneficiaries of financial and in-kind political contributions which we make whether directly or through an intermediary.	Code of Ethics	Meets	The Code of Ethics forbids Sibanye-Stillwater from making donations, either in cash or in kind, to political organisations. In addition to being illegal in South Africa, facilitation payments are forbidden in terms of the Code of Ethics (available at: https://www.sibanyestillwater.com/about-us/governance/ The approval framework also specifically addresses payments and/or donations to government.	
Transparency 1.5 We will publish our tax, royalty and other payments to governments annually by country and project. We support the principles of the Extractive Industries Transparency Initiative (EITI) and will encourage governments to promote greater transparency around revenue flows, mining contracts and the beneficial ownership of licence holders.	Integrated Annual Report Annual Financial Report King IV Disclosure Report Draft Transparency of Mineral Revenues Position Statement	Meets	Sibanye-Stillwater publishes its tax, royalty and other payments to government annually. Refer to pages 98, 99,102,172 and 300 of the 2020 IAR. Sibanye-Stillwater supports the principles of the Extractive Industries Transparency Initiative (EITI). Of the countries in which we operate or have interests, the EITI only applies to Argentina where we have exposure through the Altar project. However, Argentina joined the EITI in 2019, but still have to be assessed against the EITI standard before it becomes applicable. In terms of beneficial ownership refer to share information as published in the 2020 IAR on pages 310-311 as well as the share ownership and beneficial ownership details as in the remuneration report on pages 147 – 165.	The draft Transparency of Mineral Revenues Position Statement was approved by the Policy Review Committee and the Disclosure Committee and published on the website on 18 June 2021.
Taxes and transfer pricing 1.6 We will pay the taxes and royalties required by host country codes. We will seek to ensure that transfer pricing outcomes are in line with fair business practices and value creation.	Integrated Annual Report Annual Financial Report King IV Disclosure Report Draft Transfer pricing policy	Partially meets	Sibanye-Stillwater discloses payments of taxes and royalties. Refer to pages 98, 99,102,172 and 300 of the 2020 IAR. Although we are finalising our Transfer Pricing Policy, the company does consider transfer pricing in general and there are internal processes in place regarding transfer practices (e.g. interest charged between US and SA operations). Sibanye-Stillwater's Board-approved tax risk management framework promotes governance, addresses tax risk, and enables us to report and monitor our tax obligations and associated risks. Our King IV-aligned tax strategy is supported by a tax policy that details processes and policies to ensure effective implementation and compliance. Refer to the Tax Policy at: https://www.sibanyestillwater.com/about-us/governance/	Transfer pricing policy to be finalised and presented for approval in 2021.

Accountability and reporting 1.7 We will assign accountability for our sustainability performance at the Board and/or Executive Committee level. We will report publicly on our implementation of the Responsible Gold Mining Principles and provide the resources needed to support effective implementation.	Social, Ethics and Sustainability Board Committee Exco Committee ESG Exco sub- Committee Integrated Annual Report	Meets	Social, economic and natural environment as well as ethics are considered by the Board's Social, Ethics and Sustainability Committee. A subcommittee of the Group Executive Committee, the ESG Committee, is primarily responsible for environmental, social and governance performance and reporting. The ESG Strategy is central to the Sibanye-Stillwater's strategy as embedding ESG excellence in the way we do business. Refer to pages 64-67 of the 2020 IAR. During 2020 the Group has introduced ESG into the performance evaluation for Long Term Incentives to embrace a broader span of ESG issues and including an element of ESG into the performance conditions into remuneration. For further detail refer to the Remuneration Report in the 2020 IAR from p 146.	The ESG LTIP performance measures for the Group was approved by the Social, Ethics and Sustainability Board Committee in February 2021 and will be further embedded in the business during 2021.
realise opportunities and provide realisk Management		Meets	Our Enterprise Risk Management framework and processes are	siana ana manage ooi impacis,
2.1 We will maintain systems to identify and prevent or manage both the risks that face our operations and those which our activities may pose to others.	Policy Ethics and Corporate Governance Policy Statement Risk Management Framework and Charter		based on the ISO 31000 Risk Management: Principles and Guidelines, COSO Enterprise Risk Management Framework and King IV Report on Corporate Governance. They guide us in identifying risks and opportunities in the context of our strategic objectives and the prevailing dynamics in our internal and external operating environment. Once identified, the risks and opportunities are evaluated against the board approved impact matrix and plans are developed to reduce the risks and to act on the opportunities. In terms of King IV, risk management is a key governance functional area. The Risk Committee oversees risk management on behalf of the Board, which has ultimate responsibility. See the Corporate governance section on pages 114, 117-118 and 121 in the 2020 IAR for further detail on the Risk Committee, and its composition and activities in relation to risk governance. In addition, the Board and Risk Committee are supported by the Audit Committee which reviews external assurance of our strategic risks. Risk assessments are conducted per operation as well as at corporate level. Environmental and social risks management is integrated within the various departments and business unit risk management process. A uniformed risk matrix has been implemented.	

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			Refer to the Managing our risk and opportunities within the external operating environment section on page 26 – 59 and our material issues on p 68 -70 of the 2020 IAR.	
Stakeholder Engagement 2.2 We will listen to and engage with stakeholders in order to understand better their interests and concerns and integrate this knowledge into how we do business.	Stakeholder Engagement Policy Community and Indigenous Policy (superseded by Indigenous People and Mining Position Statement finalised after the review period) Human Rights Policy Sustainable Development Policy Statement Draft ESG Policy Draft Indigenous People and Mining Position Statement	Meets	Stakeholder engagement is integral part of our business and within our policy statement on stakeholder engagement we commit to create appropriate platforms for open and participative engagement. Stakeholder engagement is guided by our Code of Ethics. In addition, dedicated executives have been appointed with responsibility for stakeholder engagement in South Africa and in the US, respectively. The stakeholder engagement policy guides stakeholder interaction with clearly outlined protocols on how we manage stakeholder concerns and expectations. As a responsible corporate citizen, Sibanye-Stillwater fosters and maintains constructive engagement with all stakeholders. By doing so, we can deliver on our vision to create superior value for all stakeholders, create an enabling environment to deliver on our strategy, and maintain our social licence to operate in support of long-term success and sustainability. The Social, Ethics and Sustainability Committee monitors the extent to which we are successful in achieving this. Our ESG strategy sets out specific objectives, opportunities and potential risks to stakeholder engagement. Refer to the Engaging with our stakeholders section on pages 72-81 of the 2020 IAR.	To finalise and approve:
Due Diligence 2.3 We will regularly and systematically conduct due diligence to identify human rights, corruption and conflict risks associated with our activities and in our supply chain with the intention of preventing adverse impacts. We will exercise risk-based due diligence on those entities to which we sell our products.	Human Rights Policy (superceded with an updated policy finalised after the review period) Security Policy Draft Supplier Policy	Partially meets	Due diligences have been completed focusing on gender issues (Barriers review, Infusion report). Protection Services also complete due diligences and training in line with the UN Voluntary Principles on Human Rights. Culture interventions are also rolled out to employees and addresses human rights issues. Illegal mining is becoming an increasing issue for and risk to sustainability of the mining industry in South Africa.	Increase our in-house capacity on human rights and a consolidation of due diligence processes on human rights topics such as the gender barriers report is being undertaken. Once consolidated the areas not covered will be receiving attention in 2021. Existing Human Rights Policy updated to include WGC,

			There is a particular risk to employees who live in local communities who are threatened and intimidated into assisting or partaking in illegal mining activities. Latest statistics indicate more than a quarter of adults eligible to work are unemployed – the highest rate in the world – and almost half of the entire population live below the poverty line. Under such circumstances, it is only natural that people will migrate to areas believed to provide employment opportunities. Given the mining industry's historic and continued role as a significant employer, it is also natural that people continue to look to the mines not only for jobs but also a share in socio-economic benefits. It is in this context that the influx of people continues to grow on the doorstep of our SA operations. The quality of life of many of these already destitute people is made infinitely more difficult by the poor delivery of basic municipality services. The responsibility of which is borne by local government. The conditions and frustrations suffered by these communities are sometimes vented through community protests, often directed at our operations which are expected to provide jobs, procurement opportunities, services and infrastructure needs.	ICMM and UNGC requirements included. Note – Human Rights Policy has been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Impact assessment 2.4 We will conduct impact assessments that involve substantive environmental components, socioeconomic (including human rights where relevant) and cultural elements and ensure that these are periodically updated. We will seek to identify and take account of local cumulative impacts. We will ensure that such assessments are accessible to affected communities and include plans to avoid, minimise, mitigate or compensate for significant adverse impacts.	Human Rights Policy (superceded with an updated policy finalised after the review period) Stakeholder Engagement Draft Indigenous People and Mining Position Statement Draft Land Position Statement Draft Post Mining Socio-Economic Sustainability and Closure Position Statement Draft Mineral and non-mineral waste management Position Statement Draft Water health Position Statement	Meets	Impact assessments are required by law before the commencement of any project has been done where required. ESG procedures are part of our current due diligence investigations for significant investments and we are expanding these to specifically include human rights aspects. Environmental Impact Assessments, approved Environmental Management Plans and Integrated Water Use licenses are available for all the gold operations in scope for this assessment. All of the above involves a public participation process that allows for meaningful stakeholder engagement and ensuring transparency in terms of the proposed projects. The company also identifies and considers cumulative impacts and ensure the plans include the principles of the mitigation hierarchy namely avoiding, minimising, mitigating and/or restoring adverse environmental impacts. The stakeholder engagement and environmental procedures furthermore provides consistent implementation of these requirements and are supported by specialist assessments to monitor, investigate and mitigate impacts.	To finalise and approve: Draft ESG Policy; Draft Indigenous People and Mining Position Statement Draft Land Position Statement Draft Post Mining Socio-economic Sustainability and Closure Position Statement Draft Mineral and non-mineral waste management Position Statement Draft Water Health Position Statement Draft Air Quality Position statement Draft Biodiversity Position statement

	Draft Air Quality Position Statement Draft Biodiversity Position Statement Draft Climate Change Position Statement Draft Heritage Position Statement Environmental Impact Assessments Environmental Management Plans Integrated Water Use Licenses Public Participation documents			Draft Climate Change Position statement Draft Heritage Position statement Existing policies updated to include WGC, ICMM and UNGC requirements included: Stakeholder Engagement Policy; Human Rights Policy Note – All policies and position statements mentioned above have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Resolving grievances 2.5 We will establish fair, accessible, effective and timely mechanisms through which complaints and grievances related to our activities can be raised and resolved and remedies implemented. Those raising such grievances in good faith will not face discrimination or retaliation as a result of raising their concerns.	Sustainable Development Policy Statement Draft ESG Policy Stakeholder Engagement Code of Ethics Sexual harassment Policy	Meets	The Community Grievance Mechanism was updated and communicated at every level of engagement internally and externally. The Group has a grievance procedure in place for its' employees that is communicated during initial onboarding of an employee and annually during refresher training and can be formal or informal. General communications of the process are also distributed on a regular basis. To facilitate the reporting of non-compliance, we have two toll-free lines – one for South Africa and one for the US. Employees, suppliers and customers can use the toll-free lines to report irregularities and misconduct without fear of victimisation. Whistle-blower reports, which are anonymous and confidential, are managed by Protection Services. These reports are reviewed by the Audit Committee and the Social, Ethics and Sustainability Committee. Discrimination cases deemed to be part of the priority misconduct will be referred to a Dispute Resolution Unit (DRU), which will subsequently appoint an investigator. An employee can lead their own grievance, or it can be led by the DRU.	To finalise and approve:

Principle 3 – Supply chain: we will req	uire that our suppliers o	onduct their b	ousinesses ethically and responsibly as a condition of doing business wi	th us.
Supply Chain Policy 3.1 We will support our contractors and suppliers to operate responsibly and to standards of ethics, safety, health, human rights and social and environmental performance comparable with our own. We will conduct risk-based monitoring of compliance.	Draft Supplier Policy Code of Ethics	Partially meets	The suppliers, business partners and contractors are required to adhere to the Company's policies and practices as stipulated in the Company's business contracts upon on-boarding / acceptance. Within our standard terms and conditions applicable to supply contracts, suppliers are required to adhere to a range of legislation relevant to human rights as well as adherence to our own policy statements and Code of Ethics. Sibanye-Stillwater aims to conduct a comprehensive review of supplier and contractor management system elements as they relate to the Sustainable Development framework, including but not limited to screening procedures, follow-up procedures for "high-risk" suppliers and contractors, contractual performance requirements and training, with particular emphasis on monitoring and compliance procedures. During 2020, Sibanye-Stillwater circulated a questionnaire to all existing vendors, requiring them to answer, through the Coupa system, a set of questions relating to ESG matters which included questions relating to human rights matters such as child labour, fair wages and forced labour practices. At the end of 2020 over 600 suppliers have responded to the questionnaire but a large number of contractors were yet to respond.	The draft supplier policy to be finalised and send for approval in 2021. Aspects of the supplier and contractor review have been completed by 31 December 2020, however a third-party review of suppliers will be conducted during 2021 with completion of this review by 31 December 2021.
Local Procurement 3.2 We will promote access for local businesses to procurement and contracting opportunities generated by our operations and, where appropriate, provide capacity building support to help them improve their capabilities as suppliers.	Draft ESG Policy Enterprise Development and Supplier development strategy Preferential Procurement Reports SMME Strategy and local procurement initiatives	Meets	Note: Mining Charter III stipulates local enterprise procurement targets that the South African operations have to deliver against. In 2020 Sibanye-Stillwater had increased it's database of local doorstep suppliers to further enhance local expenditure. With the assistance of Coupa, Sibanye-Stillwater has been able to build a database of approximately 900 doorstep suppliers – these suppliers situated within the municipalities around our operations and in 2020 a total of 10% of the procurement budget was spent through these companies. This has resulted in a positive trend for Sibanye-Stillwater's spend on the community-based companies as the intention is to increase procurement spend up to 15% of the budget in the short-term. This is an encouraging step to promote development-oriented policies that support entrepreneurship and encourage the formalisation and growth of micro-, small- and medium-sized enterprises. To ensure the meaningful inclusion of local suppliers and potential suppliers, Sibanye-Stillwater has engaged the services of two	To finalise and approve:

Market access for ASM 3.3 We support access to legitimate markets for those artisanal and small-scale miners (ASM) who respect applicable legal and regulatory frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalisation. We will consider supporting government initiatives to reduce and eliminate the use of mercury by ASM.		Meets	enterprise development service providers, Phakamani and Black Deal, to support local SMMEs through support programmes and skills development, thereby allowing them to participate in the company's supply chain programme while looking for opportunities in other industries. The support programmes coach and develop the skills of fledgling companies. Not only have these companies helped suppliers build capacity to secure durable contracts through mentoring and training, they have also provided guidance in everything from financial management and bookkeeping to business planning and proposal writing. 350 Suppliers participated in the training programme and 217 loans were disbursed totalling R63.5 million. In support of local economic development, a CEO Enterprise Development Fund was created in March 2020. The objective of this fund is to assist our local entrepreneurs' entry into the Group's supply chain and to promote alternative economic endeavours. This is principally for SMME's that are required to purchase assets and or goods in order to deliver on a purchase order issued by the supply chain function. The fund has been capitalised to the value of R14.5 million. Note: Sibanye-Stillwater operations do not have any local artisanal and small-scale mining. Sibanye-Stillwater has established an ASM working group to ensure the companies remains informed and develop action plans as the industry debate artisanal and small-scale mining.	
empower them to speak up if they en Safety	Health and Safety		Safety was specifically included as one of our CARES values and	To finalise and approve:
4.1 We will be proactive in preventing fatalities and injuries to our workforce. Regular safety	Policy Draft ESG Policy		the focus on safe production and operational excellence as part of the Group's strategy (page 22 of the 2020 IAR) and ranks 5 th in	Draft ESG Policy.

training will be conducted and personal protective equipment will	Zero Harm Safety Strategy		our Top 10 Residually Ranked Risks (pages 42 and 49 of the 2020 IAR).	Note – ESG Policy has been approved by the Policy
be supplied at no cost to our workforce. Our objective is zero harm.	Real risk reduction fatal risk control protocols		Safety and Health of employees also form part of the ESG strategy (page 64 of the 2020 IAR)	Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
			As integrated risk management is an essential component of the Sibanye-Stillwater approach to safe production, considerable attention was given to further enhance management of risks. Our main risks are rock mass failure, trackless mobile machinery, railbound equipment, winches and rigging, shafts and fires. Specific safety measures were also adopted to ensure the safety of our workforce during the Covid-19 pandemic. Refer to pages 13-14 of the 2020 IAR.	
			Refer to page 205 of the 2020 IAR for reference to Accountability, Governance and Assurance practices associated with safety performance. In addition, refer to Sibanye-Stillwater's Zero Harm Safety Strategy on page 206 of the IAR 2020, which was developed in 2018 and was the result of extensive collaboration with some key stakeholders, particularly organised labour and the Department of Mineral Resources and Energy (DMRE). This collaboration ensured buy-in from a regulator and employee stakeholder perspective.	
			Site leadership and safety professionals conduct monthly meetings to focus on safety culture and monitor progress. This includes routine monitoring of site-specific and region-wide action plans aimed at improving safety performance as well as a series of workshops with site leadership to identify strategies for sustainable safety performance.	
			PPE is provided to employees at no cost in order to adhere to the Zero Harm philosophy.	
			Training is encapsulated within the "empowered people" pillar of the Zero Harm Strategic Framework.	
			Refer to pages 204-215 of the 2020 IAR for more information on our approach to continuous safe production.	
Safety Management Systems 4.2 We will implement safety and health management systems based on internationally recognised good practice and focused on	Health and Safety Policy Zero Harm Safety Strategy	Meets	Subscribing to and implementing international best practice principles and integrated systems and adhering to leading global standards is vital to supporting and driving Sibanye-Stillwater's safe production strategy. Refer to page 208 of the 2020 IAR for	Improvement: The Gold operations are aiming towards ISO45001 certification by end 2021.

continuous improvement of our performance. We will engage regularly on these issues with our workforce and their representatives.	Real risk reduction fatal risk control protocols Bow ties Planned unwanted events assessments		more information to Sibanye-Stillwater's fit for purpose safety systems. To mitigate and control these risks we have increased the use of bowtie methodology. The top five risks identified are analysed and based on a causation model, providing a clear pictorial on how we manage the risk. Operations are required to conduct self-assessments on critical controls on a monthly basis to ensure controls are in place and are adequate to mitigate the risk. The Synchromine system has seen constant evolution and improvement with a deep dive that was conducted on the fall-of-ground risk identification. This entailed a revamp of the safety officer checklists to include detailed inspection points to enable the workplace to be declared safe before work can be undertaken. Bonuses of safety officers are linked to the quality of the safety audits and not to production. In terms of engagements about safety issues please refer to page 78 of the 2020 IAR, specifically to our engagement with trade unions through safety and health summits. In 2020 new training initiatives were designed and rolled out for frontline supervisors to better equip them in engaging and leading these new crews. The Khumbul'ekhaya mining industrywide safety initiative was also relaunched at our SA operations in an effort to remind employees to protect their colleagues, to comply with the standard operating procedures and to maintain	
Occupational health wellbeing 4.3 We will maintain high standards of occupational health and hygiene and implement risk-based monitoring of the health of our workforce based on occupational exposures. We will promote the physical and mental wellbeing of our workforce.	Health and Safety Policy Medical surveillance programme Drug Abuse Policy Various Sibanye- Stillwater mandatory Code of Practices developed to manage health related risks (e.g. fitness to work, thermal stress, noise, dust, silica, etc) Wellness Strategy	Meets	Delivering on our purpose to improve lives through our mining activities, safeguarding the health and well-being of our employees, their families and our communities is a key priority. Our health strategy (see page 218 in the 2020 IAR) is intended to provide equitable healthcare based on health needs and financial risk protection. In addition, the strategy focuses on preventative healthcare with enhanced occupational health services which support a healthy workforce. Due to the ongoing management of tuberculosis (TB) and other communicable diseases in South Africa, the Group could quickly react to the COVID-19 global pandemic and to ensure that the health and well-being of our employees remained a priority across the business. Sibanye-Stillwater conducts annual medical examinations of all employees and on-site contractors engaged in risky work to ensure that they are fit and healthy to meet the inherent	

Community health and emergency planning 4.4 We will identify and eliminate or minimise significant risks to the health and safety of local people as a result of our activities and those of our contractors. We will develop, maintain and test emergency response plans based on national regulations and international best practice guidelines, ensuring the involvement of potentially affected stakeholders.	Risk Register Emergency Response Plans	Partially Meets	requirements of the work assigned to them, as required by the Mine Health and Safety Act (MHSA). In terms of Mental Health Services, in an effort to alleviate some of the psychosocial impacts of the pandemic on the well-being of our employees, we expanded access to mental health services in June 2020 at our SA operations. This service includes management support, promotion of well-being and lifestyle changes as well as a broad range of services such as counselling and psychological and trauma issues. The access points include telephonic and face-to-face discussions both off-site and on-site, based on employee preference. Specific resilience training was offered daily to health care workers facing the infectious pandemic. We have wellness teams, social workers, ICAS and network providers to support employees, including those with substance abuse disorders. For more detail on the Health, Wellbeing and Occupational Hygiene practices please refer to pages 216-226 of the 2020 IAR. The risk management process is based on ISO 31000 Risk Management: Principles and Guidelines, COSO Enterprise Risk Management and King IV. Please refer to managing risks on pages 22, 26, 27, 49 and 68 of the 2020 IAR. Emergency preparedness plans are available per operation and TSF (please see page 209 and p268 of 2020 IAR). Emergency medical services is equipped with advanced paramedical teams and 24/7 rescue capability. Links to information in the 2020 IAR: COVID-19 impact and response: page 13-14. Continuous safe production: pages 206-215. Health, well-being and occupational hygiene: page 216 – 226.	Community involvement in development of emergency response plans to receive more focus. Community engagement in terms of health and emergency issues also to be addressed by ISO 45001 implementation.
UN Guiding Principles 5.1 We will adopt and implement policies, practices and systems	Human Rights Policy (superseded with an updated policy	Partially Meets	Our commitment to respect human rights is stipulated within Sibanye-Stillwater's Human Rights Policy Statement. The Human Rights policy was updated to include the requirements of the	To finalise and approve: • Draft ESG Policy;

based on the UN Guiding Princip on Business and Human Rights.	les

finalised after the review period) Draft ESG Policy Draft Indigenous People and Mining Position Statement

ICMM and WGC at the end of 2020 and published on the website in 2021.

Being a responsible business, the Group performed a due diligence on gender specific concerns in 2018 - the SA operations completed an Employment Equity Barriers Audit focusing on women in mining. The outcomes of this report have seen the establishment of a Women in Mining Working Group for the group and the CEO is the co-champion for the Mineral Council's Women-in-Mining initiative for the industry.

Refer to the Empowering our workforce section on page 192 of the 2020 IAR.

Communities and external stakeholder grievances: Grievance process for social matters are discussed within the Integrated Report as part of the grievance procedure.

- The Grievance register is in place for all the operations
- Independence included in resolution matrix
- Grievance mechanism in place to be used by employees and external stakeholders to report and escalate complaints as well as to report non compliances and to ensure that redress mechanism is known.

Refer to the Social upliftment and community development section on page 231 in the 2020 IAR.

A toll-free line managed by an independent party is available for all operations. Refer to the Corporate governance section on page 108 in the 2020 IAR.

Employees can either formally or informally raise concerns and is guided by the Grievance Policy in place.

Refer to the Empowering our workforce section on page 193 of the 2020 IAR.

A sexual harassment policy also addresses unfair discrimination.

Sibanye-Stillwater's human resources performance is monitored and audited by several external agencies such as the Department of Employment and Labour (and in the US by the Department of Labour and Industry) and the Department of Mineral Resources and Energy. The South African Commission on Gender Equality as well as the Human Rights Commission also externally review certain practices. The South African Board of People Practices audited our Human Resources practices during 2020.

- Draft Indigenous
 People and Mining
 Position Statement
 Existing policies updated to
 include WGC, ICMM and
 UNGC requirements included:
 - Human Rights Policy

Note – Policies and position statements as per above have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.

Training and awareness materials developed would incorporate the reviewed policies into induction material after approval.

Increase our in-house capacity on human rights and a consolidation of due diligence processes on human rights topics such as the gender barriers report is being undertaken. Once consolidated the areas not covered will be receiving attention in 2021.

Refer to the link where policies and position statements can be viewed: https://www.sibanyestillwater.com/sustainability/reports-policies /

Avoiding complicity 5.2 We will seek to ensure that we do not cause, and are not complicit in, human rights abuses either directly or through our business relationships.	Human Rights Policy (superseded with an updated policy finalised after the review period) Draft ESG Policy Draft Screening and Verification Policy Whistleblowing Policy Code of Ethics	Partially Meets	alignment to the Voluntary Principals on Security and Human Rights. An analysis of all the Protection Services procedures was completed during the year to identify which areas of Sibanye-Stillwater Protection Services' procedures need to be aligned to the Voluntary Principles on Security and Human Rights. It is expected from all security contractor service providers to adhere to these procedures which include Human Rights requirements. During the contracting process security service providers are required to present evidence confirming that the service provider adheres to the Code of Conduct for Security Service Providers and their employees are trained in Human Rights. Adherence to the Human Rights Policy Statement and Code of Business Conduct is managed within the terms and conditions agreed to between the parties. Compliance is a requirement and the security service providers are audited annually. Although no dedicated Human Rights training were presented to Protection Services employees during the year the induction and refresher training encompasses human rights aspects with regards to security. Due diligence processes occur in isolation in various departments e.g. Social, Supply Chain and Protection Services (Security), but a holistic view for the Group should be done as a consolidated process.	Do a holistic, consolidated human rights due diligence across the business. Also refer to action items as per 2.3; 3.1 and 5.1 To finalise and approve: • Draft ESG Policy; Existing policies updated to include WGC, ICMM and UNGC requirements included: • Human Rights Policy Note – Policies as per above have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on
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Security and human rights 5.3 We will manage security-related human rights risks through implementation of the Voluntary Principles on Security and Human Rights.

Human Rights Policy (superseded with an updated policy finalised after the review period) Security Policy Code of Ethics Whistleblowing Policy Fraud Response Plans

Partially Meets

Sibanye Protection Services manages a screening process by which all employees, inclusive of security contractors, are screened.

Regarding security officers in South Africa, all security personnel must be registered with PSIRA.

Training through the induction programme includes Human Rights related material.

During the contracting process security service providers are required to present evidence confirming that the service provider adheres to the Code of Conduct for Security Service Providers and their employees are trained in Human Rights. Adherence to the Human Rights Policy Statement and Code of Business Conduct is managed within the terms and conditions agreed to between the parties. Compliance is a requirement and the security service providers are audited annually. Although no dedicated Human Rights training were presented to Protection Services employees during the year the induction and refresher training encompasses human rights aspects with regards to security.

Existing policy updated to include WGC, ICMM and UNGC requirements included:

Human Rights Policy

Note – Human Rights Policy has been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.

Sibanve-Stillwater Protection Service is in the process of ensuring alignment to the Voluntary Principals on Security and Human Rights. An analysis of all the **Protection Services** procedures was completed during the year to identify which areas of Sibanye-Stillwater Protection Services' procedures need to be alianed to the Voluntary Principles on Security and Human Rights. It is expected from all security contractor service providers to adhere to these procedures which include Human Rights requirements.

Sibanye-Stillwater is currently not a member of the Voluntary Principles but aligned to the principles. A GAP analysis has been performed to identify areas that need to be addressed to ensure that Sibanye-Stillwater's procedures, policies and practices complies to all the requirements. Furthermore,

				Sibanye-Stillwater has a Voluntary Principles Alignment Guide. Protection services have recently commenced with the training of their employees on Human Rights and that it is embedded with their operating model.
Conflict 5.4 We will implement the Conflict- Free Gold Standard. We will ensure that when we operate in conflict- affected or high-risk areas our operations do not cause, support or benefit unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law.	Conflict Free Gold Standard documents	Partially Meets	Sibanye-Stillwater have implemented the Conflict Free Gold Standard and adheres to the necessary requirements prescribed. In terms of the 2018 Heidelberg Conflict Barometer, none of gold operating assets controlled, managed or associated with Sibanye-Stillwater, falls within an area identified as "conflict-affected or high risk". Furthermore, the gold or gold bearing material produced at the abovementioned operations are not transported through any areas considered to be a "conflict-affected or high risk area". Considering the fact that neither the locations where the operations controlled, managed or associated with Sibanye-Stillwater is located, nor the areas through which the gold and/or gold bearing material is transported, is identified as a "conflict-affected or high risk area", it is apparent that Sibanye-Stillwater conforms to the provisions of Part A of the CFGS.	An independent assurance of conformance needs to be conducted.
Principle 6 – Labour rights: we will ens labour practices.	sure that our operation	s are places w	there employees and contractors are treated with respect and are free	from discrimination or abusive
Wages and benefits 6.1 We will ensure that our workforce receives fair wages and benefits relative to relevant national and local benchmarks, norms and regulations.	Remuneration Philosophy and Policy as described in the IAR 2020	Meets	Please refer to the Remuneration Report in the 2020 IAR from pages 126–165 for full details. Page 133-134 details Fair and Responsible Remuneration practices. As per page 200 of the 2020 IAR: We pay competitive wages and our employees in South Africa have access to financial and nonfinancial benefits exceeding those specified in the Basic Conditions of Employment Act. These include: Retirement or provident funds for all full-time permanent employees Care for iMali financial literacy training Medical insurance Housing ownership help desk	

			Employee assistance programme Sibanye-Stillwater continued to pay the employees' full contributions to the various retirement funds, medical aid funds as well as the related risk insurance premiums, during the COVID-19 lockdown so that cover is in place. In 2020, a pay parity audit was conducted for senior officials and the findings indicated that disparities in salary levels across gender and race are linked to longer lengths of service. On page 139 of the 2020 IAR, details can be found on the Total Guaranteed Pay levels reviewed against market benchmarks.	
Preventing discrimination and bullying 6.2 We will engage regularly and constructively with our employees and their representatives and strive to ensure a workplace free from bullying or harassment and unfair discrimination.	Code of Ethics HR Policies Sexual Harassment Policy; Employment Equity Policy; Management of Diversity Policy; Transformation Policy; Screening and Verification Policy and; Whistleblowing Policy Draft ESG Policy Human Rights Policy (superseded with an updated policy finalised after the review period)	Meets	The sexual harassment, employment equity, management of diversity and transformation policies address aspects of unfair discrimination. No incidents of discrimination were reported during 2020 for the SA operations. During the year the Human Rights Policy Statement was reviewed to align to the ICMM, United Nations Global Compact and World Gold Council Responsible Mining Principles. The commitments of the policy, which at the time of writing was still in draft, include amongst others that the Group will eliminate harassment, in all forms, bullying and discrimination in the workplace and respect freedom of association. Grievance processes are in place allowing employees to lodge a complaint formally or informally. Discrimination cases deemed to be part of the priority misconduct will be referred to a Dispute Resolution Unit (DRU), which will subsequently appoint an investigator. An employee can lead their own grievance, or it can be led by the DRU. A presiding chairperson makes a ruling to be ratified by management.	To finalise and approve:
Child and forced labour 6.3 We prohibit child labour, forced labour and modern slavery in our operations and in our supply chains.	Code of Ethics Human Rights Policy (superseded with an updated policy finalised after the review period) Child Labour Policy Screening and Verification Policy Draft ESG Policy	Meets	Refer to the Human Rights Policy Statement (https://www.sibanyestillwater.com/sustainability/reports-policies/) in which we stipulate our commitment to not employ children as well as not subject any worker to modern slavery. All employees are subject to vetting procedures, including the verification of age, criminal record checks as well as medical fitness assessments.	To finalise and approve:

			During 2020, Sibanye-Stillwater circulated a questionnaire to all existing vendors, requiring them to answer, through the Coupa system, a set of questions relating to ESG matters, which included questions relating to human rights matters such as child labour, fair wages and forced labour practices. At the end of 2020 over 600 suppliers have responded to the questionnaire but a large number of contractors were yet to respond. Within our standard terms and conditions applicable to supply contracts, suppliers are required to adhere to a range of legislation relevant to human rights as well as adherence to our own policy statements and Code of Business Ethics.	approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Freedom of association and collective bargaining 6.4 We will uphold the legal rights of our workforce to associate with others and to join, or to refrain from joining, labour organisations of their choice and to bargain collectively without discrimination or retaliation.	Code of Ethics Human Rights Policy (superseded with an updated policy finalised after the review period) Draft ESG Policy Grievance mechanisms (as required by the Labour Relations Act required and anonymous tip-offs line)	Meets	Refer to the Human Rights Policy Statement (https://www.sibanyestillwater.com/sustainability/reports- policies/) in which we commit to freedom of association and collective bargaining process. Sibanye-Stillwater's supports collective bargaining and freedom of association and we comply with both the South African and US legislation regarding working hours. As referred to on page 198 of the 2020 IAR, each Sibanye- Stillwater employee has freedom of union association and the right to participate in collective bargaining. This is a central pillar in our Employment relations and Union relations toolkit.	To finalise and approve:
Diversity 6.5 We will implement policies and practices to promote diversity at all levels of the company, including the representation and inclusion of historically underrepresented groups and will report on our progress.	Code of Ethics HR Policies: Employment Equity policy; Management of Diversity policy; and Transformation policy SA Gold Culture Growth Journey Woman-in-Mining Committee and booklet Barriers review report	Meets	Sibanye-Stillwater is committed to transforming and diversifying its workforce. Our transformation journey in South Africa is guided and determined by the Mining Charter. Refer to page 193 of the 2020 IAR for more details on diversity and employment equity. Following the update to the JSE Listings Requirements, effective for years ending on or after 31 December 2020, the Board, through the Nominating and Governance Committee, amended its diversity policy to focus not only on gender and race but also on culture, age, fields of knowledge, skills and experience (pages 110 - 112 of the 2020 IAR)	

	Infusion Drain - + /D	1		1
	Infusion Project (Dr Melani Prinsloo)			
Women in Mining 6.6 We are committed to identifying and resolving barriers to the advancement and fair treatment of women in our workplaces. Through our employment, supply chain, training and community investment programmes, we will aim to contribute to the socio-economic empowerment of women in the communities associated with our operations.	Please refer to documents listed in 6.5 as well as: Leave policy that includes maternity aspects, Remote working policy and Sexual Harassment policy	Meets	A gender working group, and subsequently a Women-in-Mining (WiM) initiative, were established which aims to accelerate diversity efforts with the objective of championing women in all levels of the organisation and increasing gender representation across the board. Board gender diversity was boosted by appointment of two female members. Diversity and inclusion programme launched with focus on women in mining (page 191 of the 2020 IAR). The 2020 IAR details the actions taken to promote women in leadership through an established program (page 192 of the 2020 IAR).	
Raising concerns 6.7 We will provide a confidential mechanism through which employees and others associated with our activities may raise ethical concerns and which will provide protection from retaliation for those who raise concerns in good faith.	Code of Ethics Whistleblowing policy Fraud Response plans Anonymous tip-offs hotline	Meets	Details of our anonymous tip-offs line is available on our website, our Code of Ethics and notice boards throughout the organisation. Refer to page 109 of our 2020 IAR for a summary of the anonymous calls received for 2020. Regarding worker grievances, employees can either formally or informally raise concerns and is guided by the Grievance Policy in place. Refer to page 193 of the 2020 IAR for details to the grievance process and the communication of the procedure with employees. The Community Grievance Mechanism was updated and communicated at every level of engagement internally and externally. Refer to Grievance procedure summary for Social upliftment and community development, included in the 2020 IAR on pages 231-232, which also includes details to the stakeholder grievance / complaints procedure implemented by Sibanye-Stillwater.	
Principle 7 – Working with communitie respect.	es: we will contribute to	the socio-ed	conomic advancement of communities associated with our operations	and treat them with dignity and
Community consultation 7.1 We will consult regularly and in good faith with the communities associated with our operations on	Stakeholder Engagement Policy Community and Indigenous People	Meets	A Stakeholder Engagement Model is in place which maps the stakeholders and how relationships with them are managed. The stakeholder matrix identifies material issues to each stakeholder	To finalise and approve: • Draft ESG Policy;

matters of interest to them and will take account of their perspectives and concerns.	Policy (superseded by Indigenous People and Mining Position Statement finalised after the review period) Draft position statements on Partnerships for Development as well as Indigenous People and Mining detailing the technical requirements to achieve the policy commitments Sustainable Development Policy Draft ESG Policy Stakeholder Engagement Framework Stakeholder Mapping Community Engagement Forums		group including communities (refer to page 72, and in particular pages 74-75, of the 2020 IAR which focus on communities). The Group continues to focus on improving relationships with communities. While it has an open door policy, there are Community Engagement Forums (CEFs), which is the more standard community engagement structure used across the industry, allowing the company to focus on specific issues and is used as a platform. The purpose of the platform is to engage communities about any operational or SLP developments that may impact their environment and/or livelihoods as well as to be deliberate and proactively discuss social risks to mitigate potential risks to the business. Partnerships with government and other private-sector players are progressing to unlock alternative economic activities. Refer to the Social Upliftment and Community Development section of our 2020 IAR (page 228) for detailed information. A community complaints procedure has been instituted. Its objective is to ensure that issues or complaints are recorded in a register, resolved and feedback provided to stakeholders within a stipulated turnaround time. In this way, issues will all be resolved before they develop into disputes (please refer to pages 74-77 of the IAR 2020 referring to stakeholder engagement specifically with communities). Please also refer to environmental stakeholder engagements on pages 255 -257 of the 2020 IAR. Also refer to Community Complaints Procedure Summary on page 232 of our 2020 IAR.	Draft Indigenous People and Mining Position Statement Draft Partnerships for Development position statement Existing policies updated to include WGC, ICMM and UNGC requirements included: Stakeholder Engagement Policy Note – ESG Policy, Stakeholder Engagement Policy, Indigenous People and Mining Position Statement and Partnerships for Development Position Statements have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Understanding communities 7.2 We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner. We will be alert to the dangers of causing differentially negative impacts on women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups. We will strive to ensure that the voices of these groups are heard	Stakeholder Engagement Policy Human Rights Policy (superseded with an updated policy finalised after the review period) Draft ESG Policy Draft Indigenous People and Mining Position Statement	Meets	This principle also links to disclosures under 7.1. Stakeholder engagement is integral part of our business and within our policy statement on stakeholder engagement we commit to create appropriate platforms for open and participative engagement. Our CARES values and the Stakeholder Engagement Policy Statement (https://www.sibanyestillwater.com/sustainability/reports-policies/) guide our approach to stakeholder engagement.	To finalise and approve: • Draft ESG Policy; • Indigenous People and Mining Position Statement Existing policies updated to include WGC, ICMM and UNGC requirements included: • Stakeholder Engagement Policy; • Human Rights Policy

and that this knowledge is integrated into how we do business.			See pages 74-75 of the 2020 IAR for specific detail on engaging with communities. A stakeholder engagement policy statement guides stakeholder interaction with clearly outlined protocols on how we manage stakeholder concerns and expectations. As a responsible corporate citizen, Sibanye-Stillwater fosters and maintains constructive engagement with all stakeholders. By doing so, we can deliver on our vision to create value for stakeholders, create an enabling environment to deliver on our strategy and maintain our social licence to operate in support of long-term success and sustainability. The Social, Ethics and Sustainability Committee monitors the extent to which we are successful in achieving this. Our ESG strategy sets out specific objectives to stakeholder engagement (see page 64 of the 2020 IAR).	Note – ESG Policy, Stakeholder Engagement Policy, Human Rights Policy and Indigenous People and Mining Position Statement have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Creating local benefits 7.3 We will ensure that the communities associated with our operations are offered meaningful opportunities to benefit from our presence, including through access to jobs and training, and procurement opportunities for local businesses and social investment.	Draft ESG policy Draft Partnership for Development Position Statement Community Policy Statement (superseded by draft Indigenous People and Mining Position Statement) Preferential Procurement Reports Enterprise Development Strategy SMME Strategy and local procurement initiatives	Meets	Refer to the ESG strategy in which we set out our commitment to socio-economic development of communities (see page 64 of the 2020 IAR). Mining Charter III stipulates local enterprise procurement targets that the South African operations have to deliver against. In 2020, the Group played its part in supporting the government and local stakeholders deal with the impact of COVID-19, see page 12 of the 2020 IAR. To facilitate greater procurement opportunities among local suppliers and potential suppliers, we engaged the services of two enterprise development service providers to coach and develop the skills of fledgling companies (see pages 240-243 of the 2020 IAR). R14.5 million was provided through a CEO-initiated CEO SMME support fund to stimulate local economic growth in local communities (see pages 240-243 of the IAR 2020). In terms of local employment, 79% of our SA workforce is made up of South African citizens, and of those 29.08% were employed from our doorstep communities. In 2020, socio-economic development expenditure amounted to R202 million while a total of R1,734 million was spent on implementing SLP projects (see the Social and Labour plans summary of projects in South African at:	To finalise and approve: Draft ESG Policy; Indigenous People and Mining Position Statement Partnership for Development Position Statement Note – ESG Policy, Partnership for Development and Indigenous People and Mining Position Statements have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.

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			policies/j.	
Seeking community support 7.4 We will seek to obtain and sustain the broad-based support of communities affected by our activities.	Stakeholder Engagement Policy Draft ESG Policy Draft Indigenous Mining and People Position Statement) Draft Partnership for Development Position Statement Stakeholder Engagement Framework Community grievance mechanism Community Engagement Forums	Meets	Stakeholder engagement is integral part of our business and within our policy statement on stakeholder engagement we commit to create appropriate platforms for open and participative engagement. This principle also links to disclosures under 7.1 and 7.2. Management sees the credibility with all stakeholders as an opportunity to attracting broad-based support for the company's operations – refer page 59 of the 2020 IAR for related opportunities to the primary business risks. Sibanye-Stillwater has, over the last few years, sought to develop a customised version of the Good Neighbor Agreement stakeholder agreement (as implemented in the US ops) that can be implemented within the unique South African context. What is being developed in partnership with stakeholders is a Social Compact, or a formalised cooperative relationship agreement, that is largely based on the tenets of the Zambezi Protocol. This essentially prioritises mutually respectful relationships and requires a foundation of trust to be developed between the industry and its stakeholders. Sibanye-Stillwater have begun laying the foundations for building a Social Compact with a stakeholder trust building project in the Free State in 2020. Please refer to pages 74-77, 231 and 241 in the IAR 2020 for more detail.	To finalise and approve: • Draft ESG Policy; • Indigenous People and Mining Position Statement • Partnership for Development Position Statement Note – ESG Policy, Partnership for Development and Indigenous People and Mining Position Statements have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
In-migration 7.5 We will work with local authorities and community leaders to control or manage the impact of migratory influxes of people attracted by mine development.	Employee Housing Scheme Local recruitment strategy Land donations - the Bhongweni Village	Meets	Sibanye-Stillwater engages with communities to ensure proper management of influx of job seekers, procurement opportunities, services and infrastructure needs. Please refer to Local employment initiatives on pages 193-194 of the 2020 IAR. The company has an employee housing scheme to encourage home ownership, drives a local recruitment strategy to ensure communities benefit from opportunities and have also donated land to communities to assist in identified needs (please refer to pages 200-203 of the 2020 IAR for more detail on the initiatives). The Group also donated land of 65.8531 hectares (the Bhongweni Village), situated in Randfontein to the Rand West	

			City Local Municipality. The land includes 288 two and three bedroom family units, a school, a pre-school and community facilities. Sibanye-Stillwater further committed to taking responsibility for the installation of new bulk infrastructure, internal reticulation of water, electricity, sewer disposal, roads and storm water systems as well as paying an engineering services contribution for bulk services such as sewer purification works.	
Indigenous People 7.6 We will respect the collective and customary rights, culture and connection to the land of Indigenous Peoples. We will work to obtain their free, prior and informed consent where significant adverse impacts may occur during exploration, project design, operation and closure, including around the delivery of sustainable benefits.	Draft ESG Policy Human Rights Policy (superseded with an updated policy finalised after the review period) Stakeholder Engagement Policy Community and Indigenous People policy (superseded by draft Indigenous People and Mining Position Statement) Community forums	Partially Meets	Indigenous People and Mining Position Statement has been drafted defining Indigenous people for the SA operations as well as the governance, monitoring and evaluation of performance with regards to Indigenous People.	To finalise and approve:
Cultural heritage 7.7 We will seek to preserve cultural heritage from adverse impacts associated with project activities, including through our impact assessments. We will put in place chance finds procedures at all relevant operations.	Draft ESG Policy Human Rights Policy (superseded with an updated policy finalised after the review period) Draft Indigenous People and Mining Position Statement Draft Heritage Position Statement	Partially Meets	Draft Heritage Position Statement which is inclusive of a Chance Find Protocol has been created. Heritage audits/heritage impact assessments completed (over a number of years leading up to 2020). Heritage resources inventories/site heritage databases created and compiled for all Operations. A Group Heritage Resources Management Status Quo & Gap Analysis completed in 2020. A Heritage Step Change Strategy compiled in 2020.	To finalise and approve the:

Resettlement 7.8 We will seek to avoid involuntary resettlement. Where this is unavoidable, we will proceed on the basis of meaningful consultation with affected communities, a publicly available planning framework, the restoration of established livelihoods and the provision of fair and timely compensation. We will seek to minimise adverse impacts on displaced people.	Draft ESG Policy Sustainable Development Policy Statement Community and Indigenous People policy (superseded by draft Indigenous People and Mining Position Statement) Draft Indigenous People and Mining Position Statement	Partially Meets	While there have been no resettlements or plans to resettle communities, the company notes that in the life of its operations it might need to resettle communities. To this end, in 2020, the company engaged with peers to benchmark best practices and is finalising a resettlement procedure that covers the rights of affected stakeholders, complies with legislation and in line with international best practices. Resettlement of communities is not considered a significant issue for the South African gold operations.	Note – the ESG Policy and Heritage Position Statement were approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021. The Chance Finds Protocol was finalised in 2021. To finalise and approve: • Draft ESG Policy; • Draft Resettlement procedure • Draft Indigenous People and Mining Position Statement Note – ESG Policy and the Indigenous People and Mining Position Statement have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
		environmental i	responsibility is at the core of how we work	
Managing environmental impacts 8.1 We will implement systems to monitor and manage our impacts on the environment. We will avoid, minimise, mitigate or compensate for significant adverse impacts.	Draft ESG Policy Sustainable Development Policy Environmental Impact Assessments	Meets	Environmental impact assessments are performed and impacts are managed. The Group drives good stewardship in terms of water management, reduction of its carbon footprint and concurrent rehabilitation in a quest to reduce any adverse environmental impacts on people and the planet. Please refer to Minimising our Environmental impact section in the 2020 IAR from page 244.	ISO14001 is in process of being implemented. To be completed at end Q4 2021. To finalise and approve: • Draft ESG Policy. Note – ESG Policy have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Tailings and waste management	Tailings Stewardship Policy	Meets	An inventory of existing and planned dams, heap-leaching facilities and water infrastructure is available.	To finalise and approve: • Draft ESG Policy;

8.2 We will design, build, manage and decommission tailings storage and heap-leaching facilities and large-scale water infrastructure using ongoing management and governance practices in line with widely supported good practice guidelines. We will not develop a new mine that would involve the use of riverine or shallow submarine tailings.	Draft ESG Policy Third-party independent review of tailings facilities and sign-off from the Engineer of Record Draft Air Quality Position Statement		The TSF's are managed and governance practices are in place as TSF's are high risk and management of it is a legal requirement. Competent people are assigned (VP Tailings Management – Ross Cooper) and annual third party audits were conducted. In addition, board members attended training on the management of tailings storage facilities. An Independent Tailings Review Board (ITRB) comprised of internationally renowned tailings experts was appointed in 2021. The Group has developed a Tailings Management System that includes standards which stipulate the responsible management of tailings storage facilities (TSF). The standards specify the managerial responsibility for tailings management and the maintenance and surveillance requirements of TSFs. Mandatory Code of Practices guide the operations on how to manage TSFs. Tailings specialists are undertaking monthly monitoring to verify the integrity, stability and functionality of the TSFs. Specialist engineers conduct quarterly inspections to monitor compliance with regulations. Prior to (and post) publication of the Global Industry Standard on Tailings Management (GISTM) on 5 August 2020, our TSFs were managed in accordance with SANS 10286 and the site-specific mandatory codes of practice. The GISTM has raised the bar in terms of governance, integration with environmental and social impacts and risk management, however several requirements of the GISTM are already met with our historical practices. Various initiatives have been implemented to align with requirements and the intent of the GISTM, with the aim of reaching compliance by August 2023. Dedicated Tailings Management web page launched on the Group website in line with commitment to transparent disclosure. (https://www.sibanyestillwater.com/sustainability/environment/tailings-management/!) Please refer to page 120, 244, 268 and p 270 of the 2020 IAR for more detail. Also refer to the Fact sheet on Tailings management at bitter.	Draft Air Quality Position Statement Note – The ESG Policy and Air Quality Position Statement have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021. The work that is beng done towards the GISTM will continue until conformance is achieved in 2023 as per the ICMM requirements.
Cyanide and Hazardous materials 8.3 We will identify and manage potential risks relating to the transportation, handling, storage	Draft ESG Policy Materials Stewardship Policy	Partially Meets	at: https://www.sibanyestillwater.com/sustainability/reports-policies/ Within the Material Stewardship policy and the Mineral and non-mineral waste Management Position Statement the Group commits to source, utilise, re-use and dispose of materials in a	In process of being International Cyanide Management Code (ICM)I certified in 2021, but

and disposal of all hazardous materials. Where our operations use cyanide, we will ensure that our arrangements for the transport, storage, use and disposal of cyanide are in line with the standards of practice set out in the International Cyanide Management Code.

Draft Mineral and non-mineral Waste Management Position Statement Gap audit documentation in preparation for the ICMI certification. manner that is optimal, appropriate and responsible with regard to environmental, social, health and safety considerations.

Use of hazardous materials such as cyanide and explosives are controlled through the use of standard operating procedures and mandatory codes of practise and have material data sheets displayed on the products and other areas such company intranet and warning boards. Please refer to page 247 of the 2020 IAR.

A Waste Management Procedure referencing the handling, transportation and disposal of hazardous waste is in place.

A Hazardous Material (HAZMAT) Management Procedure is in place. This procedure includes, amonst others, the following aspects with regard to hazmat management:

- Risk exposure, monitoring and control;
- Register of Hazmat
- Selection and purchasing of new hazardous materials
- Risk assessment process (considerations)
- Management and systems controls
- Training, auditing and record-keeping
- Labelling and decanting

A waste database for the SA operations is in place detailing the collection of waste information. The group manages its wastes according to the Waste Hierrachy, whislt also pursuing the long-terms goal/philosophy of "zero non mineral waste to landfill".

We aim to ensure responsible storage, collection, reuse, recovery, treatment and disposal of general and hazardous waste. The National Environmental Management Waste Management Act: National Information Regulations requires that hazardous waste generators and landfill owners are registered with the national (South African) and regional (Gauteng) waste information systems. Our operations, where required, are registered as per the regulations. The regulations highlight the importance of accurate waste information and waste record-keeping, as is the case of the landfills we operate.

We have identified several waste streams for which some research has commenced to integrate the waste circular economy back into operations, where different waste is considered for operational requirements in neutralisation,

company is implementing management systems and policies that reflect these standards of practice.

To finalise and approve:

- Draft ESG Policy;
- Draft Waste
 Management
 Position Statement
- (Revised) Waste
 Management
 procedure aligned to
 ISO 14001: 2015

Note – ESG Policy and Waste Management Position Statement have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.

Biodiversity 9.1 We will implement biodiversity management plans. At a minimum,	Sustainable Development Policy Draft ESG Policy	Meets	Refer to the ESG Strategy as on page 64 of the 2020 IAR where environmental stewardship is a key element of the ESG strategy.	The area of traditional knowledge should will be incorporated into biodiversity
activities and minimise them. We will only sell mercury thereby captured for uses recognised as acceptable by international conventions. Noise and dust 8.5 We will adopt and implement policies and practices to avoid or mitigate impacts on local communities and the environment arising from noise, dust, blasting and vibration. Principle 9 – Biodiversity, land use an for responsible mine closure. Biodiversity	Sustainable	Meets work to ensure	Sibanye-Stillwater does have policies and practices in place to avoid or mitigate impacts from noise, dust, blasting and vibration to surrounding communities. Please refer to pages 255 and 256 of the 2020 IAR for additional disclosures to Air Quality. A standardised procedure for air quality management monitoring and reporting has been used by all the South African operations since April 2018. This procedure standardises the approach to dust management, monitoring and reporting.	The area of traditional
Mercury 8.4 We will not use mercury to extract gold in our processing facilities nor accept gold produced by third parties using mercury. We support the Minamata Convention's objective of reducing mercury emissions for the protection of human health and the environment. We will identify point source mercury emissions to the atmosphere arising from our		Meets	cyanide destruction, infill, structural support, energy alternatives, and soil enhancement. For more detail on hazardous and general waste, please refer to pages 267-270 of the 2020 IAR. We do not purchase mercury in our operations. A letter signed by the Head of the Procurement department served as confirmation.	

we will seek to ensure that there is no net loss of critical habitat. Where opportunities arise to do so, we will work with others to produce a net gain for biodiversity. We will incorporate both scientific and traditional knowledge in designing adaptation strategies in ecosystem management and environmental assessment.	Draft Biodiversity Position Statement Draft Land Position Statement Biodiversity Management and Action Plans		Biodiversity Management and Action Plans have been developed and implemented for all the Gold operations. Please see the section on Biodiversity on pages 270 - 271 in the 2020 IAR as well as the Biodiversity management fact sheet at: https://www.sibanyestillwater.com/sustainability/reports-policies/	assessments where possible and applicable. To finalise and approve:
World Heritage Sites 9.2 We will not explore or seek to develop new mining operations in an area designated as a World Heritage Site.	Sustainable Development Policy Draft ESG Policy Draft Heritage Position Statement	Meets	No mining site is within a World Heritage Site – the latitude and longitude of all gold operations were compared against the locations of the World Heritage Sites in South Africa and confirmed to be outside of any of the World Heritage Sites Refer to page 272 of the 2020 IAR for a description of Sibanye-Stillwater's approach to monitor land and heritage. With any new development (exploration, prospecting, construction and operation), a detailed environmental impact assessment will be done, entailing a prior comprehensive, risk-based and a Multi Criteria Decision-making matrix-based site selection study, which as a rule would seek to avoid World Heritage Sites or any other "green" or "brown" sensitive areas.	To finalise and approve:

Land use and deforestation 9.3 We recognise the importance of integrated land use planning. In determining our project footprint, we will give meaningful consideration to the land access needs of nearby communities and to the preservation of biodiversity. We will aim to minimise deforestation arising from our activities.	Draft ESG Policy Draft Land Position Statement Draft Biodiversity Position Statement EMPs Land use planning and Spatial Planning and Land Use Management Act (SPLUMA) activities	Meets	As an extractive industry player, we are acutely aware of our obligation to close our mining operations responsibly and rehabilitate our footprints to appropriate and agreed-upon end land uses, cognisant of regional and national interests. As part of responsible land management, we have also embarked on a livestock husbandry management initiative. The Beatrix operations in the Free State Province of South Africa, is to be used as a test pilot site for the development and implementation of this project. The concept will enable us to assist employees and animal owners from the community to benefit financially from the programme and at the same time benefit the environment and the land and water resources. Please refer to disclosure under 9.1 as it is also relevant to this principle. Deforestation at Sibanye-Stillwater is not a significant concern due to the topography of the land where Sibanye-Stillwater operates - the only type of deforestation that occurs is the clearing of alien invasive plant species for the benefit of local biodiversity.	To finalise and approve: • Draft ESG Policy; • Draft Biodiversity Position Statement • Draft Land Position Statement Note – ESG Policy and Biodiversity and Land Position Statements have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
Mine closure 9.4 We will plan for the social and environmental aspects of mine closure in consultation with authorities, our workforce, affected communities and other relevant stakeholders. We will make financial and technical provision to ensure planned closure and post-closure commitments are realised, including the rehabilitation of land, beneficial future land use, preservation of water sources and prevention of acid rock drainage and metal leaching.	Draft ESG Policy Draft Post-Mining Socio-Economic Sustainability and Closure Position Statement Closure Plans Closure liability assessments Closure Guideline Integrated Annual Report	Partially Meets	Closure of mines is considered a material risk (page 53 of the 2020 IAR). The Draft Mine Closure Strategy and GN1147 legislation (Financial Provision Regulations, 2015 with amended compliance deadline of June 2022) have been considered through incorporation of various sections. A closure guideline is in place which consider social aspects. Closure liability is disclosed within the 2020 IAR, refer to pages 272 - 274. Closure plans for each operation in place for South African operations. In terms of Social closure - Sibanye-Stillwater is committed to not only meeting, but going beyond this regulatory compliance in line with our purpose of ensuring that our mining improves lives. We achieve this by sharing the value created by our mining operations through partnership and collaboration (Catchment management forums, industry engagement, neighbouring mine house engagement, Municipal IDP engagement, FWRDWA etc), while integrating sustainable development and responsible social	All closure plans are to be based on acceptable post mining land uses that should be determined through an active process of engagement with relevant stakeholders. Currently stakeholder engagement per closure plans is inadequate due to limited stakeholder consultation in the development of closure plans. Need to include and document public participation process with affected communities during mine closure planning. Implementation of ISO 14001 by end 2021 will address gaps identified in terms of community engagement in terms of closure plans.

closure into our decision-making processes and forms part of group strategy (see page 231 of the 2020 IAR).

Sibanye-Stillwater is working with local government and other stakeholders to catalyse alternative economic programmes that can exist alongside mining and beyond to prevent the creation of ghost towns at the end of mining operations. Please refer to the Social Closure framework on page 233 of the 2020 IAR for more detail.

A social closure working group was established within Sibanye-Stillwater, and stakeholder engagement commenced with internal stakeholders and government to establish a social closure policy framework document on which social closure plans will be based. The outcome of discussions will also be considered the 2021 closure plan review and update.

To finalise and approve:

- Draft ESG Policy
- Draft Post-Mining Socio-Economic Sustainability and Closure Position Statement

Note – the ESG Policy and Socio-Economic Closure Position Statement have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.

Stakeholder engagement with interested and affected parties commenced on the closure plans. Comments to be included in the 2021 closure plan review.

Principle 10 – Water, energy and climate change: we will improve the efficiency of our use of water and energy, recognising that the impacts of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our licence to operate.

Water efficiency

10.1 Water efficiency - We will use water efficiently and responsibly and in co-operation with authorities and, where possible, other users. When we operate in water-stressed areas, we will take proportionate and practicable steps to improve the efficiency of our water use and seek to reduce our water footprint, including, where possible, through increased recycling.

Sustainable
Development Policy
Draft ESG Policy
Draft Water
Conservation and
Water Demand
Management
Position Statement
Draft Water Health
Management
Position Statement

Meets

Our water use management and water monitoring summary is provided on pages 257-265 of the 2020 IAR.

Water related risks are discussed on page 257 and 258 of the 2020 IAR as well as our stakeholder engagement activities relating to water management.

Regulatory inspections and external audits on licences and authorisations (environmental management plans, environmental authorisations, water use licences, waste licences, air emissions licences etc.) are performed by the Department of Minerals and Energy (DMRE), Department of Environment, Fisheries and Forestry (DEFF), or the Department of Water and Sanitation and Human Settlement (DWS) (page 255, page 256 and page 262 of the 2020 IAR)

To finalise and approve:

- Draft ESG Policy;
- Draft Water
 Conservation and
 Water Demand
 Management
 Position Statement
- Draft Water Health Management Position Statement

Note – ESG Policy and Water Conservation and Water Demand Management and Water Health Management Position Statements have been approved by the Policy Oversight Committee as well

				as the Disclosure Committee and published on the website on 18 June 2021.
10.2 Recognising that access to water is a human right and fundamental ecosystem requirement, we will manage our operations so as to ensure that they do not adversely affect the overall quality of catchment water resources available to other users.	Sustainable Development Policy Draft ESG Policy Draft Water Conservation and Water Demand Management Position Statement Draft Water Health Management Position Statement	Meets	Please also refer to Water Use Management and Water Risk Management reporting in the IAR, 2020 on p 257-258. There is also a recognition that recycling, and harvesting is a critical aspect to ensure available use of potable supply by local communities. South African legislation, primarily through the National Water Act and supported by the National Environmental Management Act, requires the management and protection of the water resource for all users. As part of legislation, incidents of non-compliance in the management of water resources, particularly to non-compliance in respect of discharge qualities, are required to be reported. Our water quality non-conformance procedure applies to all discharges into the environment and therefore has largely been applicable to the gold operations (given that the SA PGM operations are zero effluent/discharge operations). Under this procedure, we examine our water quality compliance monthly in the downstream environment in terms of various limits, most of which are more stringent than official water use licence limits. Refer to pages 262-265 in the 2020 IAR for additional disclosure to our responsible water use management and a compliance	To finalise and approve: Draft ESG Policy; Draft Water Conservation and Water Demand Management Position Statement Draft Water Health Management Position Statement Note – ESG Policy and Water Conservation and Water Conservation and Water Demand Management and Water Health Management Position Statements have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.
10.3 We support the objectives of global climate accords through avoidance, reduction or mitigation of carbon emissions. Where relevant, we will work to enhance the ability of our operations and nearby communities to be resilient to the effects of climate change.	Sustainable Development Policy Statement Draft ESG Policy Draft Climate Change Position Statement Draft Energy and Decarbonisation Position statement Carbon Management Policy Statement Carbon inventory CDP Disclosure SA Au Energy and GHG model master	Meets	summary of discharges compared to legal limits. Sibanye-Stillwater has aligned their outcomes with the SDG's, one of the SDG's being SDG 13 "Climate Action" – refer to page 66 of the 2020 IAR for further detail and to the Alignment to the UNGC and SDG's fact sheet for the 2020 reporting (https://www.sibanyestillwater.com/sustainability/reports-policies/) Sibanye-Stillwater participate in the CDP disclosure and achieved an A- rating (see page 248 of the 2020 IAR) and have an energy strategy in place which consists of four pillars which include alternative energy as well as energy efficiency programmes. The following strategic objectives have been set as part of the response programme: Develop, maintain, and update a greenhouse gas (GHG) emissions inventory, and reduce GHG emissions Develop and implement an energy and decarbonisation strategy	To finalise and approve: • Draft ESG Policy; • Draft Climate Change Position Statement • Draft Energy and Decarbonisation Position Statement Note –ESG Policy and Climate Change and Energy and decarbonisation Position Statements have been approved by the Policy Oversight Committee as well as the Disclosure Committee and published on the website on 18 June 2021.

	Integrated Annual Report		Aim to achieve carbon neutrality by 2040. Through the proactive management and reduction of our carbon footprint we voluntarily monitor and report on our carbon emissions in our integrated reports, and in the CDP disclosure. We are committed to achieving a carbon neutral position by 2040. Refer to page 247-251 of the 2020 IAR for details to our activities in responding to climate change.	
Energy efficiency and reporting 10.4 We will work to improve the efficiency of our energy use and to minimise our greenhouse gas emissions intensity. We will measure and report on our CO ₂ equivalent emissions in line with accepted reporting standards.	Sustainable Development Policy Statement Draft ESG Policy Carbon inventory SA Au Energy and GHG model master CDP Disclosure Beatrix Methane Capture Project Integrated Annual Report Climate Change Risk and Vulnerability Scenario Analysis	Meets	Refer to pages 251-253 of the 2020 IAR to see details regarding energy and decarbonisation as well as demand-side energy management. In 2020, we continued to pursue energy efficiency opportunities at our South African operations in order to minimise the impact on the operational cost base and reduce our carbon emissions. Given the continued risk Eskom poses to our South African operations, in the form of unreliable electricity supply, above-inflation tariff increases and carbon-intensive electricity, and the global climate change imperative, a priority initiative during 2020 was the formulation of a South Africa-focused energy and decarbonisation strategy. Refer to the Generating clean energy: Beatrix methane project fact sheet at: https://www.sibanyestillwater.com/sustainability/reports-policies/ Scope 1, 2 and 3 carbon emissions are calculated based on the guidance of the World Resources Institute's Greenhouse Gas Protocol, and this is independently assured on an annual basis. Refer to page 300 of the 2020 IAR for the externally assured carbon emissions numbers.	To finalise and approve:

4 Description of any non-conformance

Sibanye-Stillwater have systems in place for monitoring adherence to company policies and processes, including those related to conformance with the RGMPs.

Policies were still in process of approval at end of 2020 and while policies were in place addressing requirements of the RGMPs, new policies were developed to align to all requirements of the WGC RGMPs as well as to the ICMM requirements and have been presented to the Executive team for approval. All policies and position statements to give support to the World Gold Council requirements were approved by the Policy Review Committee and the Disclosure Committee and were published on the Sibanye-Stillwater website. (https://www.sibanyestillwater.com/sustainability/reports-policies/)

The following principles were partially met at the end of the 2020 review period and specific action plans to address the gap / improvement have been described alongside:

- **Principle 1.6 Taxes and transfer pricing policy -** Transfer pricing policy to be finalised and presented for approval in 2021.
- Principle 2.3 Due Diligence; Principle 5.1 UN Guiding Principles and Principle 5.2 Avoiding complicity

 The group will commission a holistic human rights due diligence across the business in 2021. Also refer to action items as per 3.1. The draft ESG policy and the updated Human Rights policy was approved in 2021. Training on human rights issues will be embedded more firmly in 2021.
- **Principle 3.1 Supply Chain Policy** The draft supplier policy to be completed and send for approval in 2021. Aspects of the supplier and contractor review have been completed by 31 December 2020; however, a third-party review of suppliers will take place during 2021 with completion of this review by 31 December 2021.
- **Principle 4.4 Community health and emergency planning -** Communities engagement should also focus on including views on emergency planning. The ISO 45001 implementation by end 2021 will assist to address the gap identified.
- **Principle 5.3 Security and human rights –** Sibanye-Stillwater is currently not a member of the Voluntary Principles but are aligned to the principles. A gap analysis has been performed to identify areas that need to be addressed to ensure that Sibanye-Stillwater's procedures, policies and practices complies to all the requirements. Furthermore, Sibanye-Stillwater has a Voluntary Principles Alignment Guide. Protection services have recently commenced with the training of their employees on Human Rights and ensured that it is embedded within their operating model.
- **Principle 5.4 Conflict Free Gold Standard -** an independent assurance of conformance will be conducted on how Sibanye-Stillwater conforms to the requirements of the Conflict Free Gold Standard.
- **Principle 7.6 Indigenous People –** The draft Indigenous People and Mining Position Statements was only approved in 2021.
- **Principle 7.7 Cultural Heritage** Draft policies was only approved in 2021 and the Chance Finds Protocol will also be finalised in 2021.
- Principle 7.8 Resettlement the resettlement procedure was still in draft and was finalised in 2021.
- **Principle 8.3 Hazardous Waste and Cyanide** the Gold operations have completed gap analysis as part of becoming ICMI certified in 2021 and are working to address gaps identified in terms of the handling storage and transportation of hazardous materials.

• **Principle 9.4 – Mine closure** - All closure plans are to be based on acceptable post mining land uses that should be determined through an active process of engagement with relevant stakeholders. Currently stakeholder engagement per closure plans is inadequate due to limited stakeholder consultation in the development of closure plans. Need to include and document clearly public participation process with affected communities during mine closure planning.

Based on the monitoring procedures performed, except for the matter described above, the company conformed with the Responsible Gold Mining Principles as at and for the year ended 2020.

Annexure A: Independent auditor's limited assurance report

Independent auditor's limited assurance report to the Directors of Sibanye Stillwater Limited

We have undertaken a limited assurance engagement in respect of the subject matter information, as described below, and presented in the Annual Report on the Implementation of the World Gold Council's ("WGC") Responsible Gold Mining Principles ("RGMPs") by Sibanye Stillwater Limited (the "Company", "Sibanye-Stillwater" or "you") for the year ended 31 December 2020 (the Report). This assurance engagement was performed for Sibanye-Stillwater as a requirement to obtain independent annual assurance on their conformance with the WGC's RGMPs as stipulated in section D of the WGCs RGMPs (published: September 2019).

Subject matter

We have been engaged to provide a limited assurance conclusion in our report on Sibanye-Stillwater's assertions and disclosures contained in the Report, and management's description of their alignment with the relevant governance, process and control activities in operation for the 2020 reporting year, to conform with the requirements of the RGMPs, and presented on page 4-35 of the Report.

Your responsibilities

The directors are responsible for the selection, preparation and presentation of the subject matter information in accordance with the accompanying reporting criteria, and to obtain independent annual assurance to their conformance with the RGMPs as stipulated in section D of the World Gold Council's Responsible Gold Mining Principles (published: September 2019). The reporting criteria consists of the requirements set out within the World Gold Council's Responsible Gold Mining Principles (published: September 2019) and the illustrative criteria for conformance with the RGMPs set out in the "Guidance on implementing and assuring the RGMPs: Supplement to the Assurance Framework" (published: September 2019), both available on the World Gold Council's website (https://www.gold.org/about-gold/gold-supply/responsible-gold/responsible-gold-mining-principles).

These responsibilities include:

- the identification of stakeholders and stakeholder requirements, material issues, commitments with respect to the RGMPs, and
- the design, implementation and maintenance of internal control relevant to the preparation of the Report that is free from material misstatement, whether due to fraud or error.

The directors are also responsible for determining the appropriateness of the measurement and reporting criteria in view of the intended users of the subject matter information and for ensuring that those criteria are publicly available to the Report users.

Inherent limitations

Non-financial information, such as that included in the Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The methods applied by a company to comply with the RGMPs may differ.

Our independence and quality control

We have complied with the independence and other ethical requirements of the Code of Professional Conduct for Registered Auditors, issued by the Independent Regulatory Board for Auditors' (IRBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. The IRBA Code is consistent with the corresponding sections of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards).

The firm applies the International Standard on Quality Control 1, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our responsibility

Our responsibility is to express a limited assurance conclusion on the subject matter information based on the procedures we have performed and the evidence we have obtained. We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information (ISAE 3000 (Revised)), issued by the International Auditing and Assurance Standards Board, the guidance set out in the "Assurance Framework for the Responsible Gold Mining Principles" (published: September 2019) and the "Guidance on implementing and assuring the RGMPs: Supplement to the Assurance Framework" (published: September 2019). ISAE 3000 (Revised) requires that we plan and perform our engagement to obtain limited assurance about whether the subject matter information is free from material misstatement.

A limited assurance engagement undertaken in accordance with ISAE 3000 (Revised) involves assessing the suitability in the circumstances of the Company's use of its reporting criteria as the basis of preparation for the subject matter information, assessing the risks of material misstatement of the subject matter information whether due to fraud or error, responding to the assessed risks as necessary in the circumstances and evaluating the overall presentation of the subject matter information. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks. The procedures we performed were based on our professional judgement and included inquiries, observation of processes followed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above we:

- interviewed management and senior executives, at both corporate level and at selected operations, to obtain an understanding of the internal control environment, risk assessment processes and information systems relevant to the reporting process;
- assessed the suitability of policies, procedures and internal controls that the Company have in place to conform with the RGMPs;
- visited two (2) gold mining operations, which were selected considering the risk profile of those operations;
- inspected supporting documentation to corroborate the statements made by management and senior executives in our interviews;
- evaluated the reasonableness and appropriateness of significant judgements made by management and the directors in the preparation of the subject matter information; and
- evaluated whether the subject matter information presented in the Report is consistent with our overall knowledge and experience of the management and performance of the Company.

The procedures performed in a limited assurance engagement vary in nature and timing and are less in extent than for a reasonable assurance engagement. As a result, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether the Company's subject matter information have been prepared, in all material respects, in accordance with the accompanying reporting criteria.

Limited assurance conclusion

Based on the procedures we have performed and the evidence we have obtained, and subject to the inherent limitations outlined elsewhere in this report, nothing has come to our attention that causes us to believe that the subject matter for the year ended 31 December 2020 is not prepared, in all material respects, in accordance with the reporting criteria.

Other matter

The maintenance and integrity of Sibanye-Stillwater's website is the responsibility of Sibanye-Stillwater's directors. Our procedures did not involve consideration of these matters and, accordingly we accept no responsibility for any changes to either the information in the Report or our independent assurance report that may have occurred since the initial date of presentation on Sibanye-Stillwater's website.

Restriction of liability

Our work has been undertaken to enable us to express a limited assurance conclusion on the subject matter information to the directors of the Company in accordance with the terms of our engagement, and for no other purpose. We do not accept or assume liability to any party other than the Company, for our work, for this report, or for the conclusion we have reached.

PricewaterhouseCoopers Inc.
Director: Jayne Mammatt

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Registered Auditor Johannesburg 8 October 2021