

SIBANYE-STILLWATER'S ICMM SELF ASSESSMENT FOR THE YEAR ENDING 31 DECEMBER 2020

The ICMM has five subject matters that are covered by the reporting assurance engagement and within our Integrated Annual Report 2020.

Subject matter 1 requires alignment of the member's sustainability policies, standards and procedures to the ICMM principles, mandatory requirements of the position statements, corporate level performance expectations and corporate-level aspects of the relevant combined corporate- and asset-level performance expectations.

Sibanye-Stillwater was accepted as an ICMM member in February 2020. The Group has a two-year period to address the gaps identified during the review process. Progress has been made to close the gaps. As a first step, Sibanye-Stillwater reviewed all ESG-related policy statements to the ICMM mandatory requirements as set out in ICMM Position Statements, the corporate-level Performance Expectations, and the corporate-level aspects of combined Performance Expectations. The policy statements reviewed were those on human rights and stakeholder engagement. An ESG policy statement has been drafted to incorporate the previous sustainability, community and indigenous people, environmental, carbon and water policy statements. Sibanye-Stillwater has also drafted position statements in support of the reviewed policy statements to provide relevant technical guidance. Refer below on remaining ICMM gaps and the related action plans to address them. Further disclosure is also made to page 107 of the Integrated Annual Report.

This year we have added an accountability, governance and assurance section to the performance chapters within the Integrated Annual Report that sets out the primary policies, standards and procedures of the Group. *Empowering our workforce*, page 185, *Continuous safe production*, page 205, *Health, well-being and occupational hygiene*, page 217, and *Minimising our environmental impact*, page 246.

The table that follows also provide information stipulating the alignment to the performance expectations.

Subject matter 2 to document the material review process of the Group's material sustainability risks and opportunities based on its own review of the business and the views and expectations of its stakeholders.

We identify and assess our material issues through ongoing business review processes and completed a workshop this year. The process followed is inextricably linked to our integrated thinking and considers various aspects to derive at the material issues that this report reflects on. For further detail on the workshop and the material issues refer to *Our material issues*, page 68.

Our risk process is explained under *Managing our risks and opportunities within the external operating environment*, page 26.

Other sustainability related risk discussions have also been included under, *Continuous safe production*, page 206 - 209, *Health, well-being and occupational hygiene*, page 221 - 226, *Social upliftment and community development* page 231 - 240, and as part of our *Minimising our environmental impact* page 248, 251, 255 - 257, 266 - 270 amongst others.

Subject matter 3 requires Sibanye-Stillwater to provide detail about its systems and approaches that the Group is using to manage workforce safety as a material sustainability risk and opportunity.

Detailed disclosure is provided about our approach to managing *Continuous safe production*. Refer to page 205 of the Integrated Annual Report.

Sibanye-Stillwater's reported performance during the given reporting period, for a selection of material indicators of the identified material issues, have been assured as part of the **Subject matter 4** requirement. The assurance opinion to these indicators can be found on page 307 of the Integrated Annual Report.

Sibanye-Stillwater's disclosure regarding the company's prioritisation process as required by **Subject matter 5** for selecting assets for third-party Performance Expectation validation rest on Sibanye-Stillwater's production split. Further to this the operations in Southern Africa accounts for the majority of ounces produced, and account for most of the workforce employed - the majority of our activities occur in South Africa.

Therefore, the asset selection for 2021 third party assurance of the ICMM Performance Expectations will be of the South African PGMs segment. The year thereafter, 2022, it will be the SA gold segment and the US PGM operations will be the last asset to be reviewed in the three-year third party assurance cycle.



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As part of the ICMM membership application the performance expectations were considered during the self-assessment of the ICMM principles and a summary is represented within the following table:

Performance expectations	Assessment summary				GAP
Principle 1: Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development					
Performance expectations	Corporate	SA PGM	SA gold	US PGM	
<p>1.1 Establish systems to maintain compliance with applicable law.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Sibanye-Stillwater subscribes a zero-tolerance for regulator non-compliance, for which dedicated compliance officers appointed at the US and SA operations have responsibility. <i>Corporate governance</i>, page 123</p>				
<p>1.2 Implement policies and practices to prevent bribery, corruption and publicly disclose facilitation payments.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>The fundamental roots of Sibanye-Stillwater are in the Company values and CARES culture, which provide a solid base for the way the Company does business. Our CARES values are presented in <i>Our purpose, vision and strategy</i>, page 6.</p> <p>Our code of ethics requires the reporting of contraventions and non-compliance with relevant legislation and regulations and outlines our approach to ethical business practices.</p> <p>To facilitate reporting of non-compliance toll free lines are available for the US operations and SA operations. <i>Corporate governance</i>, page 108.</p> <p>Facilitation payments are addressed within the Code of Ethics available https://www.sibanyestillwater.com/sustainability/reports-policies/</p>				
<p>1.3 Implement policies and standards consistent with the ICMM policy framework.</p> <p>Applicable: Corporate</p>	<p>Partially meets</p> <p>Sibanye-Stillwater is members of the ICMM since February 2020 following a third-party assurance and independent panel review. The Company has a two-year period to address the gaps identified during the review process. The Company is progressing to close these gaps and as a first step has aligned its policies to the ICMM requirements. The policies that have been reviewed are the Sustainable Development Policy Statement, the Human Rights Policy Statement and the Stakeholder Engagement Policy Statement. The Group has also drafted position statements aligning to the ICMM requirements.</p> <p>These position statements are: Indigenous People and Mining, Partnership on Development, Climate Change, Water, Protected Area, and Transparency on Mineral Revenues. A tailings procedure has also been adopted.</p>	N/A	N/A	N/A	<p>Ensure that all Corporate and Business Unit (BU) Level policies and standards have been revised to incorporate the requirements of the ICMM Sustainability Principles, Position Statements and Performance Expectations.</p> <p>30 August 2021</p> <p>Ensure that all employees, contractors and suppliers are aware of the revised Policy Statement and the actions necessary to meet its requirements at all BUs.</p> <p>31 December 2021</p>
<p>1.4 Assign accountability for sustainability performance at the Board and/or Executive Committee level.</p> <p>Applicable: Corporate</p>	<p>Meets</p> <p>Social, economic and natural environment as well as ethics are being considered by the Board's Social, Ethics and Sustainability Committee. A sub-committee of the Group Executive Committee is primarily responsible for environmental, social and governance performance and reporting.</p> <p><i>Corporate governance</i>: Page 120</p>	N/A	N/A	N/A	



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Performance expectations	Assessment summary			GAP
Principle 1: Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development continued				
Performance expectations	Corporate	SA PGM	SA gold	US PGM
1.5 Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary. Applicable: Corporate	Meets No political contributions were made. <i>Corporate governance</i> : Page 108	N/A	N/A	N/A
Principle 2: Integrate sustainable development in corporate strategy and decision-making processes				
2.1 Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities. Applicable: Corporate	Meets Our business strategy was further strengthened by a sixth strategic focus area, embedding environmental, social and governance. A closure guideline is in place which consider social aspects. <i>(Our strategy and strategic delivery</i> , page 19; <i>Embedding ESG excellence</i> , page 62)	N/A	N/A	N/A
2.2 Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices by joint venture partners, suppliers and contractors, based on risk. Applicable: Corporate and Asset	Partially meets The suppliers, business partners and contractors are requiring adherence to the Company's policies and practices as stipulated in the Company's business contracts. <i>(Social upliftment and community development</i> , page 238)	Partially meets Requirements to third parties such as supplier and contractors by way of annexures to contract emphasise responsibility for Sustainable Development and onsite contractors are subjected to adherence Health and Safety requirements as per the Mine Health and Safety Act. Surveys to suppliers on ESG compliance have been issued during 2020. For further detail refer to <i>Social upliftment and community development</i> , page 238.	Partially meets The US operations have environmental requirements in vendor contracts. The terms and conditions to be updated to include human rights and sustainability requirements, as well.	Conduct a comprehensive review of Sibanye-Stillwater's supplier and contractor management system elements as they relate to the ICMM 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. Aspects of this process had 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. Due date: 31 December 2021



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Performance expectations	Assessment summary			GAP	
Principle 3: Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities					
	Corporate	SA PGM	SA gold	US PGM	
<p>3.1. Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to.</p> <p>Applicable: Corporate and Asset</p>	<p>Partially meets</p> <p>Our commitment to respect human rights is stipulated within Sibanye-Stillwater's Human Rights Policy Statement.</p> <p>A sexual harassment policy also addresses unfair discrimination.</p> <p>How we engage with stakeholders is stipulated in the Stakeholder Engagement policy statement. Our policy statements are under review to meet all ICMM principles.</p> <p>Refer to the link where the Human Rights and Stakeholder Engagement policy statements can be found: https://www.sibanyestillwater.com/sustainability/reports-policies/</p>	<p>Partially meets</p> <p>Being a responsible business, the Group performed a due diligence investigation 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 has 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.</p> <p><i>Empowering our workforce</i>, page 192</p> <p>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.</p> <p>Communities and external stakeholder grievances: Grievance process for social matters are discussed within the Integrated Report as part of the grievance procedure.</p> <ul style="list-style-type: none"> • 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 <p><i>Social upliftment and community development</i>, page 231</p> <p>A toll-free line managed by an independent party is available for all operations. <i>Corporate governance</i>, page 108</p> <p>Worker grievances Employees can either formally or informally raise concerns and is guided by the Grievance Policy in place. <i>Empowering our workforce</i>, page 193.</p>			<p>Policy statements: Conduct a comprehensive review of its Human Rights Policy Statement and revise the Policy Statement to ensure it is consistent with the UN Guiding Principles on Business and Human Rights.</p> <p>Stakeholder Engagement Policy Statement to be reviewed to articulate the mechanisms to be used by employees and external stakeholders to report non-compliances and to ensure that redress mechanisms are well known.</p> <p>Due date: 30 August 2021</p>
<p>3.2 Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people.</p> <p>Applicable: Asset</p>	N/A	<p>Partially meets</p> <p>We have drafted an ESG policy statement with supporting position statements of which one such position statement is on Indigenous people. The ESG policy statement will incorporate a number of existing policy statements, and with the supporting positions statements, will meet the ICMM requirements.</p> <p>Sustainable Development Policy Statement and Community and Indigenous People policy statement currently in place. Please refer to the link to view the Policy Statements: https://www.sibanyestillwater.com/sustainability/reports-policies/</p> <p>Resettlement procedure in development that will be applicable to all of Sibanye-Stillwater's assets. Resettlement procedure critical for SA PGM operations as potential of resettlement might occur in future endeavours.</p> <p><i>Social upliftment and community development</i>, page 238</p>		<p>Meets</p> <p>The National Historic Preservation Act (NHPA) requires federal agencies to consider effects of federal actions on cultural resources, including traditional cultural properties eligible for or listed in the National Register of Historic Places, and to consult with American Indian tribes to identify and resolve any adverse effects. Whenever a new action is proposed at the US operations, an environmental assessment is completed by federal and state agencies that includes consultation with American Indian tribes regarding cultural resources that would potentially be affected by the proposed action.</p>	<p>By 31 December 2021, review its Communities and Indigenous Peoples Policy to ensure that it is consistent with ICMM Performance Expectation.</p> <p>As part of this process, identify the specific standards that will guide its performance if resettlement/displacement issues are encountered going forward.</p> <p>Due date: 31 December 2021</p>



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Performance expectations	Assessment summary			GAP
Principle 3: Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities continued				
	Corporate	SA PGM	SA gold	US PGM
<p>3.3 Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.</p> <p>Applicable: Asset</p>	N/A	<p>Meets</p> <p>Sibanye Protection Services manages a screening process by which all employees inclusive of security contractors are screened.</p> <p>With regard to security officers in South Africa, all security personnel have to be registered with PSIRA.</p> <p>Training through the induction programme includes Human Rights related material.</p>		<p>Meets</p> <p>Training for the US contractors providing security services on human rights is part of initial employment training.</p>
<p>3.4 Respect the rights of workers by: not employing child or forced labour; avoiding human trafficking; not assigning hazardous/dangerous work to those under 18; eliminating harassment and discrimination; respecting freedom of association and collective bargaining and; providing a mechanism to address workers grievances.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Refer to the Human Rights Policy Statement in which we stipulate our commitment to not employ children as well as not subject any worker to modern slavery. Within this policy statement we commit to freedom of association and collective bargaining process. Please refer to: https://www.sibanyestillwater.com/sustainability/reports-policies/</p> <p>Our grievance process for employees is explained in <i>Empowering our workforce</i>, page 193</p> <p>Refer to diversity discussion within our Integrated Annual Report 2020. <i>Empowering our workforce</i>, page 110; 193</p>			
<p>3.5 Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>The Remuneration Committee assists the Board in discharging its responsibilities for setting and administering remuneration policies and practices. The Group takes care to design remuneration structures which incorporate performance targets, and consider the sustainability of the business, the career paths of leaders and the management of emerging talent.</p> <p>Refer to Remuneration Chapter in IAR <i>Remuneration report</i>, page 131 - 133; <i>Empowering our workforce</i>, page 199</p>			
<p>3.6 Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts and; deliver sustainable benefits for Indigenous Peoples.</p> <p>Applicable: Asset</p>	N/A	<p>Partially meets</p> <p>Sibanye-Stillwater's Purpose is: "Our mining improves lives", and our Vision Statement is: "Superior value creation for all our stakeholders through the responsible mining of our mineral resources."</p> <p>A Position Statement: Indigenous people 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.</p>		<p>Partially meets</p> <p>The American Indian Religious Freedom Act (AIRFA) protects and preserves for American Indians, Eskimos, Aleuts, and Native Hawaiians their inherent right of freedom to believe, express, and exercise their traditional religions.</p>
<p>3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage, and capture the outcomes of engagement and consent processes in agreements.</p> <p>Applicable: Asset</p>	N/A	<p>Partially meets</p> <p>The draft ESG policy statement specifically commits to free, prior and informed consent.</p> <p>A draft Heritage Position Statement which is inclusive of a Chance Find Protocol has been created to meet this particular performance expectation of the ICMC.</p>		Refer to gap of PE3.2
<p>3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>"At Sibanye-Stillwater, we are committed to advancing the development of women in the mining industry and better understand the culture of gender inclusion and equality amongst our workforce. It is our belief that excellence does not distinguish between genders and our leaders are sensitised to create a balanced work environment that actively promotes gender equality.</p> <p>In my capacity as Minerals Council Vice President, and Women-in-Mining Champion, I am particularly passionate about gender equality and am using my influence to drive a step change in the participation on women in our industry." Neal Froneman 7 October 2020.</p> <p>Refer to the diversity section of the Integrated Annual Report 2020: <i>Empowering our workforce</i>, page 191 - 192</p>			



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Performance expectations	Assessment summary			Comments	
Principle 4: Implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks					
	Corporate	SA PGM	SA gold	US PGM	
<p>4.1 Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Sibanye-Stillwater has a risk management process in place.</p> <p>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.</p> <p><i>Managing our risk and opportunities within the external operating environment</i>, page 26</p> <p>A materiality workshop was held and it specifically given attention to ESG risks. <i>Our material issues</i>, page 68</p> <p>Social risks were analysed through the bow-tie methodology and social risks are discussed at community engagement forums as an agenda point. <i>Social upliftment and community development</i>, page 231</p>				
<p>4.2 Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas, when operating in, or sourcing from, a conflict-affected or high-risk area.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Illegal mining is becoming an increasing issue for and risk to sustainability of the mining industry in South Africa. Increase incidents of bullying and human rights abuses, as community members, employees and contractors are coerced into becoming complicit in illegal activities. 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. Refer to the <i>Combatting illegal mining fact sheet</i>.</p> <p>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. Refer to <i>Stakeholder Engagement</i>, page 78 and <i>Managing our risks and opportunities within the external operating environment</i>, page 31.</p> <p>Our Precious Metals Refinery has been certified to be in compliance with the LPPM Responsible Platinum and Palladium Guidance. This is a requirement for refiners that wish to achieve and maintain their LPPM Good Delivery Accreditation and is intended to assure investors and consumers that the LPPM Good Delivery metal is conflict-free following compliance with an independent third-party assurance engagement. For more information refer to the disclosure on the website at https://www.sibanyestillwater.com/sustainability/reports-policies/.</p>				
<p>4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate and/ or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.</p> <p>Applicable: Asset</p>	N/A	<p>Meets</p> <p>The risk management process is based on ISO 31000 Risk Management: Principles and Guidelines, COSO Enterprise Risk Management and King IV.</p> <p><i>Managing our risks and opportunities within the external operating environment</i>, page 26 and <i>Our material issues</i>, page 68</p>			
<p>4.4 Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice.</p> <p>Applicable: Asset</p>	N/A	<p>Meets</p> <p>Emergency preparedness plans are available per operation and TSF.</p> <p>Emergency medical services is equipped with advanced paramedical teams and 24/7 rescue capability.</p> <p><i>COVID-19 impact and response</i>, page 13 <i>Continuous safe production</i>, page 209 and <i>Health, well-being and occupational hygiene</i>, page 217</p>		<p>Each TSF has an emergency preparedness plan (EPP) for imminent emergency situation.</p>	



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Performance expectations	Assessment summary			Comments
Principle 5: Pursue continual improvement in health and safety performance with the ultimate goal of zero harm				
	Corporate	SA PGM	SA gold	US PGM
<p>5.1 Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>The Zero Harm Strategic Framework was developed in collaboration with organised labour and the Department of Mineral Resources and Energy in South Africa through a series of multi-stakeholder summits.</p> <p>Engaged leadership at all levels of the organisation drives a values-driven culture by living these values and making value-based decisions.</p> <p>Our health strategy is intended to provide equitable health care based on health needs and financial risk protection. In addition, the strategy focuses on preventative health care with enhanced occupational health services which support a healthy workforce.</p> <p><i>Continuous safe production</i>, page 206; <i>Health, well-being and occupational hygiene</i>, page 216</p>			
<p>5.2 Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>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.</p> <p>Training is encapsulated within the “empowered people” pillar of the Zero Harm Strategic Framework.</p> <p><i>Continuous safe production</i>, page 207</p>			
Principle 6: Pursue continual improvement in environmental performance issues, such as water stewardship, energy use and climate change				
<p>6.1 Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Closure liability is disclosed within the IAR.</p> <p><i>Minimising our environmental impact</i>, page 272</p>	<p>Partially meets</p> <p>Closure plans for each operation in place for South African operations. A closure guideline for South African operations in place.</p> <p><i>Minimising our environmental impact</i>, page 272</p>	<p>Partially meets</p> <p>Closure plans and designs are contained in the Operating Plans for each of the US mining operations, have been approved by the regulatory agencies and Good Neighbor Councils and financial assurance is in place for closure obligations.</p> <p>The Metallurgical Complex (smelter/base metals refinery) currently lacks closure or post-closure planning.</p> <p><i>Minimising our environmental impact</i>, page 273</p>	<p>As per Sibanye-Stillwater's guideline on 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.</p> <p>Due date: 30 June 2021</p> <p>Closure plan for Metallurgical Complex to be drafted.</p> <p>Due date: 30 June 2022</p>



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Performance expectations	Assessment summary			Comments
Principle 6: Pursue continual improvement in environmental performance issues, such as water stewardship, energy use and climate change continued				
	Corporate	SA PGM	SA gold	US PGM
<p>6.2 Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Refer to the ESG strategy's Environmental pillar <i>Embedding ESG excellence</i>, page 64.</p> <p>Through the materiality workshop, water management has been identified as a key material issue.</p> <p>Water related risks are discussed on page 257 of the 2020 Integrated Annual Report as well as our stakeholder engagement activities relating to water management.</p> <p>Our water monitoring summary is proved on page 258 of the 2020 Integrated Annual Report.</p> <p><i>Our material issues</i>, page 69 - 71</p>	<p>Meets</p> <p>Water conservation and water demand management plan in place. Key components of the plan:</p> <ul style="list-style-type: none"> • Potable water independence • Reduce water loss • Water quality management <p><i>Minimising our environmental impact</i>, page 257</p>		<p>Meets</p> <p>The most critical component of the US PGM operations' water management is generally water quality when discharged.</p> <p><i>Minimising our environmental impact</i>, page 265</p>
<p>6.3 Design, construct, operate, monitor and decommission tailings disposal/ storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure.</p> <p>Applicable: Corporate and Asset</p>	<p>Partially meets</p> <p>Approach to tailings management model. For more information refer to https://thevault.exchange/?get_group_doc=24511599580476-responsible-tailings-management-mining-coalition-08Sep2020.pdf.</p> <p>A Tailings Storage Facility Management Standard being drafted to meet the Global Tailings Storage Facility Standard criteria.</p>	<p>Partially meets</p> <p>Independent verification of TSF risk controls .</p> <p>Refer to our <i>Tailings management fact sheet</i></p>		<p>Partially meets</p> <p>Stillwater's TSFs are all designed to the 72-hour probable maximum flood event when evaluating meteorological factors. All the TSFs are designed to the maximum credible earthquake.</p> <p>Extensive monitoring systems in place – with automated alarms and supported with operational manuals.</p> <p>Building on work already underway, finalize a comprehensive tailings management framework and system that specifies the requirements for performance criteria, recordkeeping, monitoring, review and updates, verification and assurance.</p> <p>Due date: 31 December 2021</p> <p>Formally role out and implement the tailings management framework and system at all Business Units with tailings management facilities</p> <p>Due date: 31 December 2021</p>
<p>6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment.</p> <p>Applicable: Asset</p>	N/A	<p>Meets</p> <p>A waste database for the SA operations is in place detailing the collection of waste information. Operate on the philosophy of zero waste to landfill.</p> <p>We have identified a number of 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, cyanide destruction, infill, structural support, energy alternatives, and soil enhancement.</p> <p><i>Minimising our environmental impact</i>, page 268</p>		<p>Meets</p> <p>The waste generation rate remains low due to the product review process that first undergo an extensive chemical review before procurement of the product.</p>
<p>6.5 Implement measures to improve energy efficiency and contribute to a low carbon future, and report the outcomes based on internationally recognised protocols for measuring CO₂ equivalent (GHG) emissions.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Sibanye-Stillwater participate in the CDP disclosure and have an energy strategy in place which consists of four pillars which include alternative energy as well as energy efficiency programmes.</p> <p>Refer to <i>Minimising our environmental impact</i>, page 247-248; 251</p> <p>Refer to the fact sheet on <i>Beatrix methane capture project</i></p>			



SIBANYE-STILLWATER'S ICMM SELF ASSESSMENT FOR THE YEAR ENDING 31 DECEMBER 2020 CONTINUED

Performance expectations	Assessment summary			Comments
Principle 7: Contribute to the conservation of biodiversity and integrated approaches to land-use planning				
	Corporate	SA PGM	SA gold	US PGM
<p>7.1 Neither explores nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated.</p> <p>Applicable: Corporate and Asset</p>	<p>Partially meets</p> <p>Sibanye-Stillwater has drafted an ESG policy statement and supporting position statement on protected areas to incorporate the requirements of performance expectation 7.1.</p> <p>No mining site is within a World Heritage Site.</p>	<p>Partially meets</p> <p>The draft ESG policy statement and supporting position statement on protected areas that has been drafted and incorporated performance expectation 7.1.</p> <p>No mining site is within a World Heritage Site.</p> <p>No operation within or near a legally designated protected area.</p> <p><i>Minimising our environmental impact</i>, page 272</p>		<p>Partially meets</p> <p>US regulations require consideration of World Heritage interests as a part of any permitting process.</p>
<p>7.2 Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no net loss of biodiversity</p> <p>Applicable: Corporate and Asset</p>	<p>Partially meets</p> <p>Draft Position Statement on Protected Area</p>	<p>Partially meets</p> <p>Biodiversity Assessment reports in place.</p> <p>Refer to our <i>Biodiversity management fact sheet</i></p>		<p>To update the policy statement to specifically commit to neither explore nor develop new mines in World Heritage Sites. Due consideration to be given to the aspiration to achieve no-net loss of biodiversity.</p> <p>Adopt and disseminate a formal corporate policy consistent with ICMM Performance Expectation 7.1 and the Position Statement on Mining and Protected Areas.</p> <p>Due date: 30 August 2021</p>
Principle 8: Facilitate and support the knowledge-base and systems for responsible design, use, re-use, recycling and disposal of products containing metals and minerals				
<p>8.1 In project design, operation and de-commissioning, implement cost effective measures for the recovery, re-use or recycling of energy, natural resources, and materials.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>ESG is the sixth pillar to the Company's strategy. Environmental pillar provides attention to natural resource management and the reuse and recycling.</p> <p><i>Minimising our environmental impact</i>, page 267 - 268; <i>Embedding ESG excellence</i>, page 62</p>	<p>Meets</p> <p>Sibanye-Stillwater's environmental function has firmly embraced the challenge to effectively reduce costs through proactive management of environmental incidents, water conservation, carbon footprint management and reducing reliance on Rand Water at the SA operations. <i>Minimising our environmental impact</i>, page 245</p>		<p>Meets</p> <p>Sibanye-Stillwater operates one of the world's largest spent autocatalyst recycling operations.</p> <p><i>Minimising our environmental impact</i>, page 269</p>
<p>8.2 Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Within the Material Stewardship policy statement the Group commits to source, utilise, re-use and dispose of materials in a manner that is optimal, appropriate and responsible with regard to environmental, social, health and safety considerations. https://www.sibanyestillwater.com/sustainability/reports-policies/</p>	<p>Meets</p> <p>Use of hazardous materials such as Cyanide and explosives is controlled through the use of standard operating procedures and mandatory codes of practises and have material data sheets displayed on the products and other areas such company intranet and warning boards. <i>Minimising our environmental impact</i>, page 247</p>		<p>Meets</p> <p>The use of hazardous materials and explosives are controlled through standard operating procedures and State and Federal Laws including, but not limited to MSHA, OSHA and ATF codes. All GHS standards, including labelling, are followed and Safety Data Sheets are available online through a contracted third party SDS and new product review system, as well in hard copy where appropriate.</p>



SIBANYE-STILLWATER'S ICMC SELF ASSESSMENT FOR THE YEAR ENDING 31 DECEMBER 2020 CONTINUED

Performance expectations	Assessment summary			Comments
Principle 9: Pursue continual improvement in social performance and contribute to the social, economic and institutional development of host countries and communities				
	Corporate	SA PGM	SA gold	US PGM
<p>9.1 Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic well-being, in partnership with government, civil society and development agencies, as appropriate.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Stakeholder Engagement policy statement. 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.</p> <p>https://www.sibanyestillwater.com/sustainability/reports-policies/</p> <p>ESG strategy sets out specific objectives to stakeholder engagement.</p> <p><i>Embedding ESG excellence</i>, page 64</p>	<p>Meets</p> <p>Community Engagement Forums is a platform to engage with communities about various issues including operational and social and labour plan developments.</p> <p>Partnerships with government and other private-sector players are progressing to unlock alternative economic activities.</p> <p><i>Social upliftment and community development</i>, page 233</p>		<p>Meets</p> <p>Through the Good Neighbor Agreement, we have engaged closely with local environmental and community groups since 2000. (<i>Good Neighbor Agreement fact sheet</i>)</p> <p>Montana's Hard Rock Mining Impact Act ensures that the needs of a host community are addressed as they occur. Under the Impact Act, the developer of each proposed new large-scale hard-rock mine is required to prepare an impact plan that identifies the local government services and facilities that will be needed as a result of the mineral development. The US PGM operations operates under this Act.</p>
<p>9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life-cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.</p> <p>Applicable: Corporate and Asset</p>	<p>Meets</p> <p>Refer to the ESG strategy in which we set out our commitment to socio-economic development of communities.</p> <p><i>Embedding ESG excellence</i>, page 64</p> <p>Refer to local procurement discussion</p> <p><i>Social upliftment and community development</i>, page 240</p>	<p>Meets</p> <p>Mining Charter III stipulates local enterprise procurement targets that the south African operations have to deliver against.</p> <p><i>Social upliftment and community development</i>, page 240</p>		<p>Meets</p> <p>As addressed in the US PGM operations economic impact study, nearly one-third of purchases of goods and services at the Segment occur from Montana vendors. As addressed further in the study, the Company's operations comprise over 5% of Montana's gross domestic product annually.</p> <p>Fact sheet on <i>Montana Economic study</i>.</p>
<p>9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities.</p> <p>Applicable: Asset</p>	N/A	<p>Meets</p> <p>Stakeholder Engagement Model is in place which clearly map whom the stakeholders are and how relationship with them is managed. The stakeholder matrix identifies issues of material to each stakeholder group. A community complaints procedure has been instituted. Its objective is to ensure that every issue or complaint is captured 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.</p> <p>Grievance procedure <i>Social upliftment and community development</i>, page 232</p>		<p>Meets</p> <p>Good Neighbor Agreement in place for twenty years</p> <p><i>Social upliftment and community development</i>, page 240</p> <p>Grievances are addressed through the GNA or a toll-free line is available.</p>
<p>9.4 Collaborate with government, where appropriate, to support improvements in environmental and social practices of local Artisanal and Small-scale Mining (ASM).</p> <p>Applicable: Asset</p>	N/A	<p>Meets</p> <p>Sibanye-Stillwater operations do not have any local artisanal and small-scale mining, however illegal mining activities take place on the surface and underground, and manifest at closed off mines it is often organised and conducted by crime syndicates. (Fact sheet: <i>Combating illegal mining</i>)</p>		



SIBANYE-STILLWATER'S ICMM SELF ASSESSMENT FOR THE YEAR ENDING 31 DECEMBER 2020 CONTINUED

Performance expectations	Assessment summary				Comments
Principle 10: Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner. Effectively report and independently verify progress and performance					
	Corporate	SA PGM	SA gold	US PGM	
<p>10.1 Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner.</p> <p>Applicable: Corporate</p>	<p>Meets</p> <p>Various engagements on ESG related matters with external stakeholders extending to ESG organisations like the ICMM, IPA and WGC. Also engagements with various investors and ESG rating agencies on ESG issues.</p> <p>Customer engagements on ESG matters.</p> <p>Issue specific engagements with external stakeholders for e.g. communities.</p> <p><i>Engaging with our stakeholders</i>, page 76</p>	N/A	N/A	N/A	
<p>10.2 Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project.</p> <p>Applicable: Corporate and Asset</p>	<p>Partially meets</p> <p>Sibanye-Stillwater supports the principles and processes of the Extractive Industry Transparency Initiative (EITI), through its membership of the ICMM. Argentina, which is up for EITI validation on 27 August 2021 is the only EITI country in which Sibanye- Stillwater have a project in.</p> <p>A position statement has been drafted on Transparency of Mineral Revenues.</p>	<p>Partially meets</p> <p>South Africa nor the US is a member country of the EITI.</p>			<p>Sibanye-Stillwater will publish a public commitment, once an ICMM member, on the EITI as commitment on the EITI:</p> <ul style="list-style-type: none"> Sibanye-Stillwater supports the principles and processes of the Extractive Industry Transparency Initiative (EITI), through its membership of the ICMM. Argentina, which is up for EITI validation on 27 August 2021 is the only EITI country in which Sibanye- Stillwater operates. <p>Due date: 31 December 2021</p>
<p>10.3 Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards.</p> <p>Applicable: Corporate</p>	<p>Partially meets</p> <p>Refer to the GRI index. https://www.sibanyestillwater.com/news-investors/reports/annual</p>	N/A	N/A	N/A	<p>Beginning with the 2020 Integrated Annual Report (which will be issued in 2021), comply fully with the ICMM requirements on public reporting and assurance</p> <p>Due date: 22 April 2021</p>
<p>10.4 Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and verifying membership requirements.</p> <p>Applicable: Corporate</p>	<p>Meets</p> <p>Refer to the <i>PwC assurance statement</i>, page 307</p> <p>Also refer to the PwC assurance statement on Sibanye-Stillwater's ICMM self assessment, page 12 of this document.</p>	N/A	N/A	N/A	

SIBANYE-STILLWATER'S ICMM SELF ASSESSMENT FOR THE YEAR ENDING 31 DECEMBER 2020 CONTINUED

INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON THE INTERNATIONAL COUNCIL FOR MINING AND METALS (ICMM) ASSURANCE AND VALIDATION PROCEDURE

To the directors of Sibanye Stillwater Limited

We have undertaken a limited assurance engagement in respect of Sibanye Stillwater Limited's (the "Company", "Sibanye-Stillwater" or "you") response to the International Council for Mining and Metals (ICMM) Assurance and Validation Procedure (published by the ICMM), as described below, and presented on page 1 to 11 of Sibanye-Stillwater's ICMM self assessment for the year ending 31 December 2020 ("the Report"). This engagement was conducted by a multidisciplinary team including health, safety, social, environmental and assurance specialists with relevant experience in sustainability reporting.

SUBJECT MATTER

We have been engaged to provide a limited assurance conclusion in our report over management's description of their alignment with the relevant governance, processes and control activities in operation for the 2020 reporting year, to meet the ICMM Assurance and Validation Procedure, and presented on page 1 to 11 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, as set out in the ICMM's Assurance and Validation Procedure (the "Reporting Criteria") and available at <https://www.icmm.com/en-gb/members/member-requirements/assurance-and-validation/procedure>.

This responsibility includes:

- The identification of stakeholders and stakeholder requirements, material issues, commitments with respect to sustainability performance
- 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 performance information is subject to more inherent limitations than financial information, given the characteristics of the subject matter and the methods used for determining, calculating, sampling and estimating such information. The absence of a significant body of established practices on which to draw allows for the selection of different but acceptable measurement techniques which can result in materially different measurements and can impact comparability. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgements. The precision of different measurement techniques may also vary. Furthermore, the nature and methods used to determine such information, as well as the measurement criteria and the precision thereof, may change over time.

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 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. This standard requires that we plan and perform our engagement to obtain limited assurance about whether the subject matters are 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, assessing the risks of material misstatement of the subject matter 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. 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, our work in respect of the subject matters consisted of:

ICMM Subject Matter #1

- For each of the ICMM Mining Principles and Performance Expectations, we obtained the documents referred to in Sibanye-Stillwater's response and confirmed that they included elements referenced
- Through discussions, we obtained an understanding of the processes that are designed to monitor compliance with these documents
- We obtained an understanding of how these documents are maintained and kept up to date
- On a sample basis, discussions were held on the application of the sustainability management systems with personnel at Business-Unit and Group level and through review of additional documents
- Discussed other Sibanye-Stillwater initiatives relevant to Sibanye-Stillwater's response to each of the ICMM Mining Principles and Performance Expectations

ICMM Subject Matter #2

- Reviewed the internal Sibanye-Stillwater documentation that described the process undertaken to identify the sustainability issues that Sibanye-Stillwater considers to be most material
- Confirmed through discussions the materiality process followed

ICMM Subject Matter #3

- Obtained the sustainability management system documents referred to in Sibanye-Stillwater's response and confirmed that they included elements referenced
- Confirmed that the management system documents relate to the material sustainability issues identified by Sibanye-Stillwater
- Discussed the internal assurance processes that are designed to monitor compliance with these documents

- Discussed how these documents are maintained and kept up to date
- On a sample basis, we held discussions on the application of the sustainability management systems with personnel at Business-Unit and Group level and through review of additional documents

ICMM Subject Matter #4

- Reviewed the Integrated Annual Report 2020 and confirmed that performance indicators related to Sibanye-Stillwater's material sustainability issues have been set out in the Integrated Annual Report
- Provided independent assurance over the selected sustainability information set out in the Integrated Annual Report

ICMM Subject Matter #5

- Through discussions, we obtained an understanding of the prioritisation process Sibanye-Stillwater applied to select assets for Performance Expectations validation, including the application of the criteria in practice
- Reviewed the relevant internal Sibanye-Stillwater documentation in support of the prioritisation process applied

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 subject matter has 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 ending 31 December 2020 is not prepared, in all material respects, in accordance with the reporting criteria.

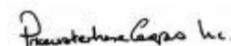
Other matters

No assurance procedures were performed on the previous subject matter information. The information relating to prior reporting periods has not been subject to assurance procedures.

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 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
Registered Auditor
Johannesburg
22 April 2021