

**2025**

**Report on conformance  
to the Global Industry  
Standard on Tailings  
Management**

**We do it better**

# Contents

## Overview

- 1 Report on conformance to the Global Industry Standard on Tailings Management (GISTM)
- 2 Introduction
- 3 Definitions

## Tailings storage facilities

- 4 **ARM Platinum**
- 5 **Two Rivers Platinum Mine:**  
Old TSF
- 9 **Two Rivers Platinum Mine:**  
De Grooteboom TSF
- 13 **Modikwa Platinum Mine:**  
Modikwa TSF
- 20 **Bokoni Platinum Mine:**  
Consolidated TSF 1-5
- 25 **Bokoni Platinum Mine:**  
Bokoni TSF 6
- 28 **Nkomati Nickel Mine:**  
Co-disposal TSF
- 34 **Nkomati Nickel Mine:**  
Onverwacht TSF
- 40 **ARM Ferrous**
- 41 **Khumani Mine:**  
Khumani PDF
- 48 **Black Rock Mining Operations:**  
Gloria old TSF  
Gloria new TSF  
Nchwaning 2 old TSF  
Nchwaning 2 new TSF
- 70 **Beeshoek Iron Ore Mine**  
Beeshoek TSF

## Appendix

- 75 Glossary of terms
- 76 Contact details and administration

### How to navigate our reports

In F2025, we again cross-reference to other documents in our reporting suite, hyperlinked for your convenience by the icon below. Photographs from our library span a number of years, including the pandemic period.



Information available on our website [www.arm.co.za](http://www.arm.co.za)

African Rainbow Minerals (ARM) is a leading South African diversified mining and minerals company with operations in South Africa and Malaysia. ARM mines and beneficiates iron ore, manganese ore, chrome ore, platinum group metals (PGMs), nickel and coal. It also produces manganese alloys and has strategic investments in gold through Harmony Gold Mining Company Limited (Harmony Gold).

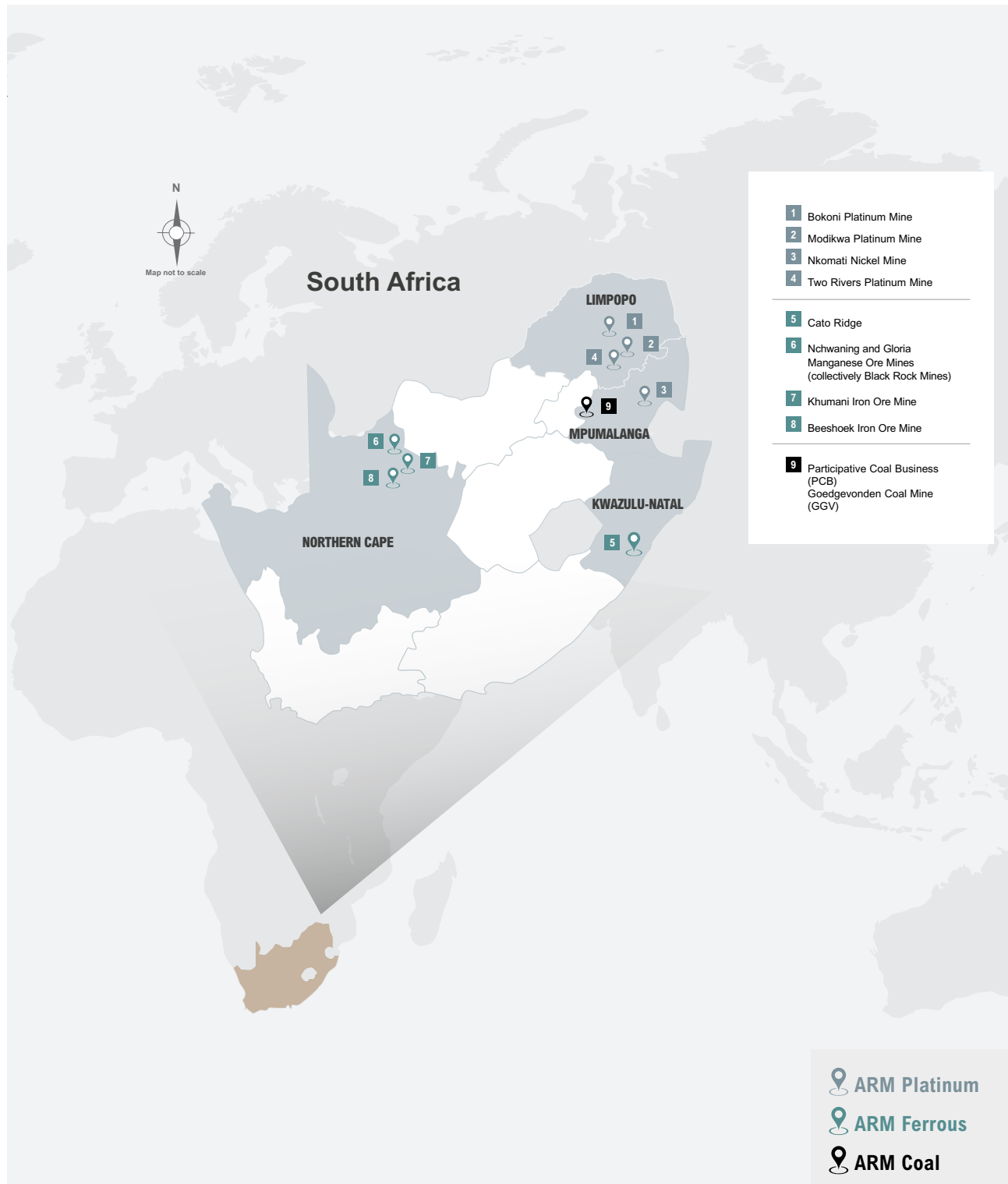




# Report on conformance to the Global Industry Standard on Tailings Management (GISTM)

## LOCALITY MAP OF ARM OPERATIONS

ARM operations are located in the Northern Cape, Limpopo, Mpumalanga and KwaZulu-Natal provinces in South Africa.



# Introduction

The Global Industry Standard on Tailings Management (GISTM or the standard) is the first global standard on tailings facility management and focuses on achieving the goal of ‘zero harm to people and the environment. It requires companies (operators) to take responsibility by prioritising the safety of their tailings storage facilities through all phases of the mine life cycle’. This goal is well aligned with ARM values, policies and standards.

The objective of the GISTM public disclosure document is to provide confirmation that ARM operations have implemented effective risk management processes and systems to ensure that tailings storage facilities (TSFs) are managed effectively and that any risk to people and the environment is identified and mitigated. ARM and its joint-venture (JV) partners have adopted GISTM at all its operations and good progress has been made in achieving full conformance. In the process of implementing GISTM, the level of awareness of mine personnel and surrounding communities of risks posed by TSFs was elevated. ARM and its JV partners will build on this foundation and ensure its TSFs continue to be operated in a safe and responsible manner to the benefit of all stakeholders involved.

**VP Tobias**  
*Chief executive officer*

**TTA Mhlanga**  
*Finance director*

4 August 2025



Bokoni Platinum Mine

# Definitions

The GISTM conformance protocols apply to tailings facilities as a whole, not just tailings embankments. They do not apply to riverine and deep-sea systems and other types of facilities such as fresh and process-water dams, stockpiles, etc (which do not conform to the definition of a tailings facility in the standard). This distinction is important because while the design, construction and operation of embankments is a very important factor in influencing the safety of tailings facilities, it is not the only factor. For example, aspects related to water management (eg seepage, surface water, etc) can be very important in ensuring safe tailings management.

## Tailings facility

A facility that is designed and managed to contain tailings produced by the mine. Although tailings can be placed in mined-out underground mines, for the purposes of the standard, tailings facilities refer to facilities that contain tailings in open-pit mines or on the surface (external tailings facilities). For the purposes of the standard, tailings facilities are higher than 2.5m measured from the elevation of the crest to the elevation of the toe of the structure or have a combined water and solids volume exceeding 30 000m<sup>3</sup>, unless the consequence classification is 'high', 'very high' or 'extreme', in which case the structure is considered a tailings facility regardless of its size. For the purposes of this standard, existing tailings facilities are facilities that are accepting new mine tailings on the date that the standard takes effect or not currently accepting new mine tailings but are not in a state of safe closure. All other facilities will be treated as 'new' for the purposes of this standard. [GISTM]

## Tailings management system

The site-specific tailings management system (TMS) comprises the key components for management and design of the tailings facility and is often referred to as the 'framework' that manages these components. The TMS sits at the core of the standard and is focused on the safe operation and management of the tailings facility throughout its life cycle (see tailings facility life cycle definition opposite). The TMS follows the well-established plan-do-check-act cycle. Each operator develops a TMS that best suits their organisation and tailings facilities. A TMS includes elements such as: establishing policies, planning, designing and establishing performance objectives, managing change, identifying and securing adequate resources (experienced and/or qualified personnel, equipment, scheduling, data, documentation and financial resources), conducting performance evaluations and risk assessments, establishing and implementing controls for risk management, auditing and reviewing for continual improvement, implementing a management system with clear accountabilities and responsibilities, preparing and implementing the OMS (operations, maintenance and surveillance) and EPRP (emergency preparedness and response plan). The TMS, and its various elements, must interact with other systems, such as the environmental and social management system (ESMS), the operation-wide management system, and the regulatory system. This interaction is fundamental to the effective implementation of the standard. [GISTM]

## Stakeholder

Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, positively or negatively. Stakeholders may include workers, trade unions, project-affected people or communities and their formal and informal representatives, national or local government authorities, politicians, religious leaders, civil society organisations and groups with special interests, the academic community, or other businesses. Different stakeholders will often have divergent views, both within and across stakeholder groupings. [GISTM]

## Tailings facility life cycle

The phases in the life of a facility, which may occur in linear or cyclical succession, consisting of:

- 1 Project conception, planning and design
- 2 Initial construction
- 3 Operation and ongoing construction (may include progressive reclamation)
- 4 Interim closure (including care and maintenance)
- 5 Closure (regrading, demolition and reclamation)
- 6 Post-closure (including relinquishment, reprocessing, relocation, removal). [GISTM]

## Tailings governance framework

A framework that focuses on the key elements of management and governance necessary to maintain the integrity of TSFs and minimise the risk of catastrophic failures. The six key elements of this TSF governance framework are:

- 1 Accountability, responsibility and competency
- 2 Planning and resourcing
- 3 Risk management
- 4 Change management
- 5 Emergency preparedness and response
- 6 Review and assurance. [GISTM]





## Two Rivers Platinum Mine

ARM's attributable beneficial interest in Two Rivers Platinum Mine operation is 54%. The other 46% is held by Impala Platinum.

### Locality

Two Rivers Platinum Mine lies in the southern sector of the eastern limb of the Bushveld Complex. The mine is located on the farm Dwarsrivier 372 KT and extends to portions of the farms Kalkfontein 367 KT and Tweefontein 360 KT and the farm Buffelshoek 368 KT. At latitude 24°59"S and longitude 30°07"E, the mine is approximately 30km from Steelpoort and 60km from Mashishing, Mpumalanga province, South Africa. It is neighboured by Mototolo Platinum Mine and Dwarsrivier, Tweefontein and Thorncliff chromite mines.

# ARM Platinum

# Contents

## Old TSF

Two Rivers Platinum Mine – Old TSF public disclosure

Description of the Two Rivers Old TSF

The consequence classification

A summary of risk assessment findings relevant to the TSF

A summary of impact assessments and of human exposure and vulnerability to TSF credible flow-failure scenarios

A description of the design for all phases of the TSF life cycle, including the current and final height

A summary of material findings of annual performance reviews and dam-safety review (DSR), including implementation of mitigation measures to reduce risk to ALARP (as low as reasonably practicable)

A summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures

A summary version of the TSF EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Dates of most recent and next independent reviews

Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## De Grooteboom

Two Rivers Platinum Mine – De Grooteboom TSF public disclosure

Description of the Two Rivers De Grooteboom TSF

The consequence classification

A summary of risk assessment findings relevant to the TSF

A summary of impact assessments and of human exposure and vulnerability to TSF credible flow-failure scenarios

A description of the design for all phases of the TSF life cycle, including the current and final height

A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

A summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures

A summary version of the TSF EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Dates of most recent and next independent reviews

Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements. Two Rivers started implementing GISTM in August 2020.

## Two Rivers Platinum public disclosure on the Old TSF

The Old TSF is currently under care and maintenance. The first step was to conduct a gap analysis between our current TSF standards and GISTM. This was followed by a detailed plan to address the social, environmental and technical gaps identified. Some of the challenges faced in implementation reflect the shortage of available technical skills in the field of tailings management. There were also initial concerns on how meaningful engagement with downstream communities could be handled without causing undue alarm.

Two Rivers conducted a self-assessment in April 2025 to update actions from the third-party validation conducted by Jones & Wagener in July 2023.

## GISTM conformance results

Of the 77 GISTM requirements, 66 'meet' conformance and two 'partially meet'. There are no requirements classified as 'does not meet'. Nine of the requirements are not applicable to this asset.

The areas that are in partial conformance are related to 'topic 2 – develop and maintain an interdisciplinary knowledge base to support safe tailings management throughout the tailings facility life cycle, including closure'. The outstanding items are being closed out as per the action plan.

## Description of the Two Rivers Old TSF

Two Rivers Mine operates as a joint venture between Impala Platinum and African Rainbow Minerals (ARM) Platinum. It is situated on the farm Dwarsrivier in the southern part of the eastern limb of the Bushveld Complex, 45km south-west of Burgersfort, in Limpopo province of South Africa. The location of the Two Rivers Old TSF is illustrated in figure 1-1; this facility reached end of operational life in early 2022 and was simultaneously decommissioned.



# Two Rivers Platinum Mine continued

## Old TSF public disclosure report continued

The Old TSF has been designed for a maximum safe final height of some 50m with an overall outer slope of 1V:3H. The facility was designed to accommodate a tailings production rate of 300 000 tonnes per month until March 2022 when deposition ceased. The TSF has a return-water dam (RWD) and a stormwater dam with a combined storage capacity of around 88 000m<sup>3</sup>.

Pertinent general information about the facility is provided in table 1.

### Site, tailings and foundation soils characteristics

The Bushveld Complex is divided into five limbs: the eastern, western, far western, northern and south-western limbs. The principal platinum group element or PGE-bearing reefs in the Bushveld Complex are the Merensky Reef, UG2 and Platreef. These lie within the Rustenburg layered suite of the Bushveld Complex.

Two Rivers Mine is on the eastern limb of the Bushveld Complex in the Rustenburg layered suite and Dwarsrivier sub-suite. The geology of this sub-suite comprises primarily anorthosite and norite, with thin localised layers of chromite and pyroxenite. The strata dips to the west.

### Consequence classification

A multidisciplinary GISTM consequence classification matrix was used to assess potential downstream impacts in a TSF-failure scenario. Using this matrix, the TSF was classified as extreme.

### Summary of risk assessment findings relevant to the TSF

A risk assessment and control procedure was generated to proactively identify, understand and address risks related to operating the TSF throughout its life cycle.

Failure modes identified for the Old TSF are wall failure resulting from inadequate structural stability; wall failure due to internal or external erosion; wall failure due to foundation weakness; wall failure due to liquefaction; and failure due to overtopping.

Comprehensive risk assessments have been carried out for all failure modes and appropriate controls have been identified and put in place.

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The TSF dam breach analysis (TDBA) study was undertaken to investigate potential downstream impacts in the event of a breach and sudden release of tailings and water downstream. Results included information on inundation extents, flood-wave travel times and maximum flow depths and velocities. These are intended to inform the consequence classification of the TSF in accordance



**Figure 1-1: Two Rivers Platinum TSF locality map (De Grootboom and Old TSFs)**

with GISTM and for use in emergency preparedness and response planning.

The findings of this study provide the technical data to inform the TSF hazard classification based on potential incremental consequences and computational output used to prepare inundation maps in support of emergency preparedness and response planning.

Due to the potential variability of tailings material properties and uncertainty on certain input parameters, a sensitivity analysis was conducted.

In the unlikely event of a failure of the Old TSF, the tailings release is expected to flow into the Klein Dwarsrivier first, then downstream to the Steelpoort River for roughly 16km. The breached tailings flow from the Old TSF is mostly contained within the floodplain of the Klein Dwarsrivier and Groot Dwarsrivier.

### Description of the design for all phases of the tailings facility life cycle, including the current and final height

#### Current operation (current height)

The Old TSF has been operating since 2006. It was originally designed to be developed as a downstream side-hill cyclone tailings facility, with a floating decant pump system. However, difficulties in achieving the required downstream profile and concomitant stability risks prompted a modification to the design in 2010. The facility initially comprised a lower and upper downstream compartment, which were combined into a single facility in 2015-2016. From then until decommissioning in early 2022, the facility operated as one compartment with



# Two Rivers Platinum Mine continued

## Old TSF public disclosure report continued

continuous upstream cyclone tailings deposition. A floating pumped decant was used to recover water. The structure currently has a maximum perimeter wall height of 50m.

### Final height design

Closure criteria are those required to mitigate identified closure risks. The measures involve removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring.

Closure criteria are closely related to actual EMP (environmental management plan) commitments to actions required at closure as prescribed by the regulators.

The proposed closure criteria related to the Old TSF are detailed in the closure plan.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP (as low as reasonably practicable)

In the 2025 annual performance review of the Old TSF, no material findings were made. Maintenance, surveillance and monitoring are continuing post-decommissioning.

### Summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

There were no material environmental findings in the annual review. The focus is on irrigation to manage dust. Two Rivers keeps a register of all environmental and

social complaints received from surrounding communities. These are recorded in the grievance register and feedback is provided to the complainant within 30 days of receipt.

### Summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Two Rivers Mine extensively engaged downstream communities to educate and create awareness of potential risks from a TSF breach.

The engagement sessions were with Dwarsrivier Chrome Mine and other stakeholders downstream of the facility. Subsequently, an EPRP was developed in consultation with downstream communities, local authorities and other private emergency services providers, eg Mine Rescue Services.

### Summary of findings from geotechnical investigation

Two Rivers Mine conducted a geotechnical investigation for the Old TSF and De Grootboom TSF from May 2024 to April 2025. The findings indicated that all sections achieved factor of safety (FoS) values that met or exceeded the required ARM group tailings storage facilities management standard thresholds.

### Dates of most recent and next independent reviews

An independent review for the Two Rivers Platinum tailings facilities was conducted by the Independent Tailings Review Board (ITRB) in July 2025. All findings from the review are in the process of being closed out as per the action plan.

**Table 1: TSF general information**

Description	Details
The operation	Two Rivers Platinum Mine
TSF operator	Intasol Tailings
Engineer of record	Herman Venter from HVTS (Pty) Ltd
Business unit	ARM platinum division
Magisterial district	Steelpoort, Limpopo province, South Africa
List of tailings storage facilities	Old TSF
TSF coordinates	24 57'17.79"S 30 06'23.52"E
TSF wall raise, initial earthworks and method of tailings deposition	Initially by downstream cyclone construction, subsequently redesigned and operated for upstream cyclone construction
Current height	50m
Current footprint area	70ha
Current storage volume	24 380 000m <sup>3</sup>
Method of deposition	The conventional cyclone method of deposition was employed on the tailings (storage facility) which was developed by upstream construction

# Two Rivers Platinum Mine continued

## Old TSF public disclosure report continued

### Annual confirmation that the operator has adequate financial capacity to cover estimated costs

The mine conducts annual rehabilitation, remediation, decommissioning and closure liability assessments to determine financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial instruments is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm-ir-reports.co.za/reports/arm-iar-2024/>

Approved by the accountable executive

**Johan Jansen**

*Acting chief executive: ARM Platinum*

4 August 2025



Two Rivers Old TSF



## Two Rivers Platinum Mine continued

### De Grooteboom TSF public disclosure report

To assess implementation of GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

Two Rivers began implementing GISTM in August 2020.

The first step was to conduct a gap analysis between our current TSF standards and GISTM. This was followed by a detailed plan to address the social, environmental and technical gaps identified. Some of the challenges faced in implementation reflect the shortage of available technical skills in the field of tailings management. There were also initial concerns on how meaningful engagement with downstream communities could be handled without causing undue panic.

Two Rivers conducted a self-assessment in April 2025 to update actions from the third-party validation conducted by Jones & Wagener in July 2023.

#### GISTM conformance results

Of the 77 GISTM requirements, 68 'meet' conformance and two 'partially meet'. There are no requirements classified as 'does not meet'. Seven of the requirements are not applicable to this asset.

The areas that are in partial conformance are related to 'topic 3 – Use all elements of the knowledge base –

social, environmental, local economic and technical – to inform decisions throughout the tailings facility life cycle, including closure.'

Additional information is required for the estimation of the TSF closure design study. A detailed plan with allocated resources has been developed to ensure the work of TSF closure design is completed as per plan.

#### Description of the Two Rivers De Grooteboom TSF

The Two Rivers Platinum Mine is situated on the farm Dwarsrivier on the southern part of the eastern limb of the Bushveld Complex, 45km south-west of Burgersfort, in the Limpopo province of South Africa, as illustrated in figure 1-1.

Two Rivers has a newly constructed TSF, De Grooteboom (DGB TSF), that is expected to reach its design life by around 2042. The dam is designed to handle both UG2 and Merensky ore tailings.

**Table 1: TSF general information**

Description	Details
The operation	Two Rivers Platinum Mine
TSF operator	Intasol Tailings
Engineer of record	Herman Venter from HVTS (Pty) Ltd
Business unit	ARM platinum division
Magisterial district	Steelpoort, Limpopo province, South Africa
List of tailings storage facilities	De Grooteboom TSF
TSF coordinates	24°55'42.41"S 30°08'13.56"E
TSF wall raise, initial earthworks and method of tailings deposition	Down and upstream cyclone
Current height	18m
Current footprint area	86ha
Current storage	6 506 284m <sup>3</sup>
Method of deposition	The conventional cyclone upstream method of deposition is used on the tailings facility. The cyclones are positioned on the crest of the facility

# Two Rivers Platinum Mine continued

## De Grooteboom TSF public disclosure report continued

The De Grooteboom TSF lies some 4km east of the UG2 concentrator plant on portion 2 and 7 of the farm De Grooteboom 372 KT.

The TSF has been designed for a maximum final safe height of around 85m at 1 072mamsl elevation with an overall outer slope of 1V:3.5H. The design tailings deposition is 300 000 tonnes per month for the first two years and 500 000 tonnes per month from year three. The return-water dam has a standby and an operating compartment with a total capacity of 98 000m<sup>3</sup>.

### Site, tailings and foundation soils characteristics

The Bushveld Complex is divided into five limbs: the eastern, western, far western, northern and south-western limbs. The principal platinum group element or PGE-bearing reefs in the Bushveld Complex are the Merensky Reef, UG2 and Platreef. These lie within the Rustenburg layered suite of the Bushveld Complex.

Two Rivers Platinum Mine is on the eastern limb of the Bushveld Complex in the Rustenburg layered suite and the Dwarsrivier sub-suite. The geology of this sub-suite comprises primarily anorthosite and norite with thin localised layers of chromite and pyroxenite. The strata dips to the west.

### Consequence classification

A multidisciplinary team used the GISTM consequence classification matrix to assess potential downstream impacts in a TSF-failure scenario. Using the GISTM matrix, the De Grooteboom TSF was classified as extreme.

### Summary of risk assessment findings relevant to the TSF

A workplace risk assessment and control procedure was generated to proactively identify, understand and address risks related to operating the TSF throughout its life cycle.

Risks identified for the De Grooteboom TSF are wall failure resulting from inadequate structural stability; wall failure due to internal or external erosion; wall failure due to foundation weakness; wall failure due to liquefaction; and failure due to overtopping.

In all cases, comprehensive risk assessments have been carried out from which appropriate controls have been identified and put in place. Details of the risks and controls are set out in the bowtie risk assessment.

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The tailings dam-breach analysis (TDBA) study investigated credible dam-breach scenarios and looked to identify potential downstream impacts in the event of a breach and sudden release of tailings and water downstream.

Results of the study include information on inundation extents, flood-wave travel times and maximum flow depths and velocities. These are intended to inform the consequence classification of the TSF in accordance with GISTM, and for use in emergency preparedness and response planning.

Due to the potential variability of the tailings' material properties and uncertainty on some input parameters, a sensitivity analysis was conducted.

### Description of the design for all phases of the tailings facility life cycle, including the current and final height

#### Current operation (current height)

In the initial stages of development, the De Grooteboom TSF is designed to be managed as an upstream facility. Later in its life cycle, some deposition will take place in the downstream direction to strengthen the facility as it increases in height and capacity. Tailings slurry is pumped through rubber-lined steel pipes.

Currently, the maximum height of the storage impoundment is 18m. It is designed to eventually reach a height of 85m. The current storage impoundment volume is some 6 506 284m<sup>3</sup>, while the planned storage impoundment volume is intended to reach 95 000 000m<sup>3</sup>.

Critical controls have been placed on the following aspects of the TSF's development:

Rate of rise or deposition rates:

- Mitigate generating excess pore pressure in the tailings body and foundation material
- Mitigate elevation of phreatic surfaces
- Allow for densification and benefits of desiccative drying to take place (ie natural compaction that mitigates the potential for liquefaction, or strain softening)
- Allow appropriate cycling times of around 30 days that assist in safe construction of deposit walls.



# Two Rivers Platinum Mine continued

## De Grooteboom TSF public disclosure report continued

Freeboard and pond location:

- The amount of available freeboard to contain/attenuate major storms on top of the TSF without spilling and promptly decanting excess water. The freeboard is designed for a 1:50-year storm plus 0.8m. This is verified quarterly with an accurate lidar survey of the TSF. The control of compliance to freeboard design ensures that beaching and freeboard generation are improved. Tailings are deposited so that the amount of fines near the outer perimeter of the TSF is minimised via the cyclone-deposition method which allows segregation of coarse tailings from fines to take place.

Regular inspections and reviews are performed on the following aspects of the TSF development and reviewed by the engineer of record (EoR) for any major changes or deviations from design assumptions:

- Slurry density, temperature, evaporation, RWD levels, piezometer levels and trends, drain flows and trends, surface-water quality, groundwater quality, update of slope stability factor of safety (FoS) by limit equilibrium methods, analysis of particle size distribution and tailings geotechnical characteristics, and piezocone (CPTu) probing and interpretation.

### Final height design

Closure criteria are the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. The proposed closure criteria related to the TSF are summarised below.

Closure criteria are closely related to actual EMP commitments, ie actions to be carried out at closure as agreed with regulators. A summary of material findings of annual performance and dam-safety reviews, including implementation of mitigation measures to reduce risk to as low as reasonably practicable (ALARP) are implemented and closely monitored.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

Considering De Grooteboom was commissioned in early 2022, material findings were indicated in the annual performance review in November 2024. The FoS on all the sections are above 1.5 for the current and undrained

conditions and above 1.1 for post-liquefaction. The stability analyses are based on overall failure scenarios through the starter wall.

### Summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

There were no material environmental findings in the annual review. Focus is on irrigation to manage dust. Two Rivers keeps a register of all environmental and social complaints received from surrounding communities. These are recorded in the grievance register and feedback provided to the complainant within 30 days of receipt.

### Summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Two Rivers extensively engaged downstream communities to educate and make them aware of potential risks of a TSF failure. Community engagement sessions were held with Dwarsrivier Chrome Mine and other stakeholders on the downstream side. Subsequent to the engagement, an EPRP was generated in consultation with downstream communities, local authorities and other private emergency services providers, eg Mine Rescue Services.

### Summary of findings from geotechnical investigation

Two Rivers Mine conducted a geotechnical investigation for the Old TSF and De Grooteboom TSF from May 2024 to April 2025. The findings indicated that all sections achieved factor of safety (FoS) values that met or exceeded the required ARM group tailings storage facilities management standard thresholds for the current TSF height.

### Dates of most recent and next independent reviews

An independent review for the Two Rivers Platinum tailings was conducted by the Independent Tailings Review Board (ITRB) in July 2025. All actions from this review will be closed out.

# Two Rivers Platinum Mine continued

## De Grooteboom TSF public disclosure report continued

### **Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs**

Two Rivers conducts annual rehabilitation, remediation, decommissioning and closure liability assessments to determine financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.



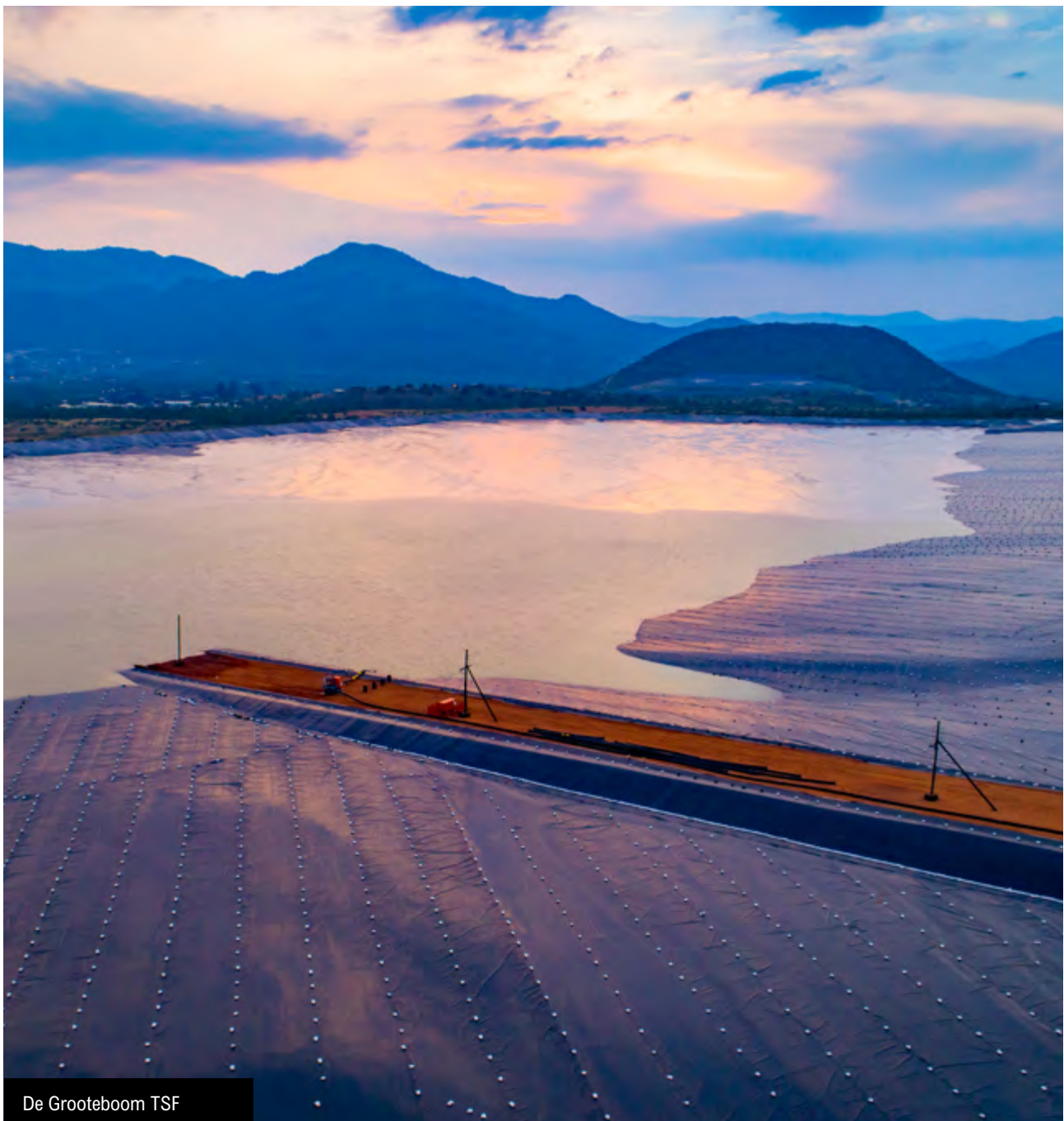
Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>.

Approved by the accountable executive

**Johan Jansen**

*Acting chief executive: ARM Technical Services*

4 August 2025



De Grooteboom TSF



## Modikwa Platinum Mine

ARM's attributable beneficial interest in Modikwa operation is 41.5%; 8.5% is held by the Modikwa communities and 50% is held by Rustenburg Platinum Mine.

### Locality

Modikwa Platinum Mine lies some 15km north of Burgersfort and 15km north-west of Steelpoort, along the border between Mpumalanga and Limpopo provinces in South Africa. Located at latitude 24°40"S and longitude 30°10"E, the site is accessed via the R37 road between Polokwane and Burgersfort. The topography of the area is defined by a low-lying broad valley that strikes due north-south and is underlain by rock units of the upper critical zone of the Bushveld Complex.

# ARM Platinum



Modikwa Mine

# Contents

## Modikwa TSF

Modikwa Platinum Mine public disclosure on the Modikwa TSF
Description of the Modikwa TSF
The consequence classification
A summary of risk assessment findings relevant to the Modikwa TSF
A summary of impact assessments and of human exposure and vulnerability to the Modikwa TSF credible flow-failure scenarios
A description of the design for all phases of the Modikwa TSF life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures
A summary version of the Modikwa TSF EPRP
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

To assess implementation of GISTM requirements, MPM used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

### Modikwa Platinum Mine (MPM) public disclosure on the Modikwa TSF

MPM began implementing the GISTM in August 2020. The first step was to conduct a gap analysis between current TSF management standards and GISTM. This was followed by a detailed plan to address the social, environmental and technical gaps identified.

Some challenges were faced while implementing detailed plans to conform with the GISTM. These included the lack

of availability of technical skilled personnel to improve and support the existing Modikwa TSF management team, and availability of competent, reputable laboratories with the capacity to manage highly sensitive materials.

Following the third-party review conducted by Jones & Wagener in July 2023, MPM conducted its first annual self-assessment in June 2024. Despite the noted challenges, MPM is pleased to report the following 2025 GISTM conformance self-assessment results:

### GISTM conformance results

Of the 77 GISTM requirements, 68 of the GISTM requirements 'meet' conformance and one of the GISTM requirements 'partially meet'. There are no requirements classified as 'does not meet'. Eight of the requirements are not applicable to this asset. The area that is in partial conformance is related to 'topic 3 – design, construction, operation and monitoring of the tailings facility'. This topic is being addressed in accordance with the updated plan.

### Description of the Modikwa TSF

MPM lies around 15km north-west of Burgersfort on the Polokwane-to-Burgersfort road (R37). The Modikwa TSF site is in a valley between the old Montrose and Winterveld chrome mines, some 3km east of the MPM concentrator plant site (refer figure 1-1). The Modikwa TSF is an upstream embankment facility with a life-of-mine of 50 years.

The RWD associated with the Modikwa TSF has both operating and standby compartments from where return water to the concentrator plant is pumped. Pertinent general information about the operation is detailed in table 1.

### Modikwa TSF site description and geology, foundation soils and tailings characteristics

The regional geology consists of basic and ultra-basic igneous rocks of the Rustenburg layered suite and Bushveld Complex. The bedrock comprises norite, pyroxenite and anorthosite of the Dwarsrivier sub-suite. The westward-dipping Merensky Reef and chromitite seams occur within this rock mass. The bedrock observed on-site is norite and the soils encountered are mainly derived from the norite.

# Modikwa Platinum Mine continued

## Modikwa TSF public disclosure report continued

**Table 1: TSF general information**

Description	Details
The operation	Modikwa Platinum Mine
TSF operator	Fraser Alexander Tailings
Engineer of record	SRK Consulting (South Africa) (Pty) Ltd
Business unit	Platinum division
Magisterial district	Steelpoort, Limpopo, South Africa
List of tailings storage facilities	Modikwa TSF
TSF coordinates	Modikwa TSF: 24°38'58.4"S 30°09'10.4"E
List of water dams	Modikwa RWD
Water dam coordinates	RWD: 24°38'31.1"S 30°09'46.6"E
Current height	Modikwa TSF: 53m (913mamsl)
Current footprint area	Modikwa TSF: 101ha
Current storage	Modikwa TSF: 50.2 million tonnes
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Silt traps at inlet to RWD</li> <li>• Solution trench at toe of facility</li> <li>• Penstock intake tower and outlet pipeline</li> <li>• Drains (main outlet drain, inner toe drain and elevated curtain drain).</li> </ul>
Method of deposition	The conventional spigot method of deposition is used on the Modikwa TSF. The spigot pipeline line is positioned on the perimeter of the crest of the facility

The residual black and dark-brown clay and silt observed have developed from the weathering and decomposition of the norite bedrock. These fine-grained materials are highly expansive and heave as much as 100mm, as predicted in geotechnical reports. The clay and silt horizons are generally thinner or non-existent nearer to the mountains on the western and south-eastern sides of the Modikwa TSF.

The Modikwa TSF comprises platinum tailings originating from mining and processing the UG2 reef.

### The consequence classification

A multidisciplinary team was involved in a workshop to apply the GISTM consequence classification matrix to assess potential downstream impacts should a breach occur on the Modikwa TSF. Using this matrix, the Modikwa TSF was classified as an extreme facility.

### Summary of risk assessment findings relevant to the TSF

A comprehensive semi-quantitative risk assessment was completed in 2024. The risk assessment process was conducted through a four-day workshop involving the Modikwa Mine site team, Anglo American Platinum (now Valterra) personnel, ARM personnel, the engineer of

record (EoR) team, other experts and risk experts, responsible for facilitating the process.

First, a technical visit to the Modikwa TSF was conducted, followed by a review of available information. The collected information was used to conduct an engineering assessment, providing key findings used to identify potential failure modes (PFMs). Next, a potential failure mode analysis (PFMA) process was carried out in two main phases: an initial individual identification and a second phase consisting of a collaborative workshop where the group thoroughly analysed each identified PFM.

As a result of this process, workshop participants identified PFMs that are applicable to the Modikwa TSF. These PFMs were developed in detail, identifying the set of factors with the potential to influence risk estimation.

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The TDBA and inundation study were conducted for MPM to evaluate the potential downstream impact of a breach in the Modikwa TSF. The breach analysis was conducted



# Modikwa Platinum Mine continued

## Modikwa TSF public disclosure report continued

for the current height of the Modikwa TSF. Based on the Modikwa TSF characteristics, critical potential breach locations were identified. The most likely failure modes were modelled and simulated for varying hydrologic conditions.

Based on population density maps and extents of inundation resulting from models in this TDBA, the population at risk was estimated. The downstream community was meaningfully engaged to raise awareness about the impact of a failure of the Modikwa TSF in the unlikely event that it occurs. A study to assess the environmental impact, social impact and local economic impact was conducted to understand the full impact extent of a failure of the Modikwa TSF.

Mitigation measures such as the emergency preparedness and response plan were generated with involvement of the downstream community, local communities and Mine Rescue Services. An emergency

environmental clean-up procedure was developed to deal with environmental spillage containment and clean-up in case of a failure of the Modikwa TSF.

### **Description of the design for all phases of the tailings facility life cycle, including the current and final height**

#### **Current operation (current height)**

The Modikwa TSF is an upstream embankment facility. Initial containment was provided by a compacted clay starter dike. The TSF was raised using an approximate overall rate of rise of 1.4m per year. The decant pool or pond is controlled in the centre of the TSF.

Modikwa TSF was designed to meet the recommended industry guidelines for FoS. While operating, the FoS is regularly reviewed through stability analyses. Proactive procedures for managing the Modikwa TSF have been implemented, which implies that a 'performance-based' approach has also been applied.



Modikwa Mine TSF

# Modikwa Platinum Mine continued

## Modikwa TSF public disclosure report continued

Critical controls have been placed on critical aspects of the Modikwa TSF's development. These controls are monitored monthly and complemented by daily, weekly, monthly, quarterly and annual reviews for any major changes or deviations from the design assumptions. The reviews are conducted by a multidisciplinary team which involves the Modikwa TSF operator, EoR, environmental specialists, mine safety personnel, responsible tailings facility engineer (RTFE) and ITRB.

### Final height design

The identified design criteria and constraints, as stated in the Modikwa TSF closure technical memorandum, will be used in developing prefeasibility closure-design options for the facility. The design criteria may need to be reviewed in a prefeasibility level stage if required and/or the feasibility stage, once additional information from geotechnical investigations and other parallel studies are concluded, and the operational stormwater management design will be completed.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

Annual performance reviews are conducted by the EoR. The following observations were made in the last review:

- Slope stability (FoS): Initial stability analysis was conducted with limited information on the material characteristics of both the tailings and the foundation. The Modikwa TSF emergency works investigation campaign was initiated to address concerns raised regarding existing knowledge gaps to be addressed, as it relates to the geotechnical characterisation of the tailings and foundational material. This produced several documents, including: geotechnical fieldwork close-out report, geotechnical investigation factual report; and geotechnical characterisation and stability analysis report. All the reports were reviewed by the ITRB. The recommendations from the ITRB are being implemented.

### Summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures

The following environmental and social findings were noted from the annual performance review:

- Dust fallout: Generally, dust fallout results were well within both residential and non-residential thresholds. MPM has a dust-suppression programme in place at the TSF
- The operating and standby RWDs operated between maximum operating level and spillway level. It is

important that the operation levels are kept below the maximum operating level (MNOL) to avoid potential overflows in the event of excessive storms

- Modikwa Platinum Mine maintains a register of all environmental and social complaints received from surrounding communities. These are recorded in the grievance register and feedback given to the complainant within 30 days of receipt.

### Summary version of Modikwa TSF EPRP

#### Emergency preparedness and response plan

Modikwa extensively engaged the downstream community to create awareness and educate residents on the potential risks of a failure of the Modikwa TSF. The engagement sessions were attended by local leaders, teachers, children and other members of the community.

Subsequent to this engagement, an EPRP was generated in consultation with the downstream community, local authorities and other private emergency services providers such as Mine Rescue Services. The EPRP at the Modikwa TSF involves early-warning systems, responding to any abnormalities, emergency evacuation plans, evacuation and environmental rapid response plan.

Following the completion of the EPRP, an emergency preparedness drill was conducted. A recovery plan is in place and the process of engagements is ongoing.

#### Trigger action response plan (TARP)

MPM has developed a TARP that gives guidance on the type of response required for an event that could trigger an emergency. The TARP consists of a set of known hazards that need to be checked for continually in the working place. The level of risk and level of responsibility that is required to deal with that risk is also pre-defined. Once the risk is identified, a remedial process is triggered. Based on the risk classification, the situation is escalated to the level of responsibility that is required to deal with that risk in terms of the definition of the process.

#### Dates of most recent and next independent reviews

An independent review of the Modikwa TSF will be conducted by the ITRB in September 2025. The ITRB included one international member and two local members.

The next independent review for the Modikwa TSF will be in March 2026 and will comprise the same ITRB members.



# Modikwa Platinum Mine continued

## Modikwa TSF public disclosure report continued

### Annual confirmation that the operator has adequate financial capacity to cover estimated costs

Modikwa conducts annual rehabilitation, remediation, decommissioning and closure liability assessments to determine financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.

Please refer to audited financial statements on the indicated links:



<https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>



<https://www.angloamerican.com/~media/Files/A/Anglo-American-Group-v9/PLC/media/press-release/releases/2025pr/anglo-american-preliminary-results-for-the-year-ended-31-december-2024.pdf>

Approved by the accountable executive

**Hendrik Kruger**

*Business leader: Modikwa Platinum Mine*

4 August 2025







# Contents

## Consolidated TSF 1-5

Bokoni Platinum Mine public disclosure on the Consolidated TSF 1-5
Description of the Consolidated TSF 1-5 TSF
The consequence classification
A summary of risk assessment findings relevant to the TSF
A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow-failure scenarios
A description of the design for all phases of the tailings facility life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## TSF 6

Bokoni Platinum Mine public disclosure on the Bokoni TSF 6
Description of TSF 6
The consequence classification
A summary of risk assessment findings relevant to the TSF
A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow-failure scenarios
A description of the design for all phases of the tailings facility life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

To assess implementation of GISTM's requirements, we have used the ICMM conformance protocols. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

## Bokoni Platinum Mine public disclosure on the Consolidated TSF 1-5

Bokoni initiated GISTM implementation in January 2023, beginning with a thorough comparison between current TSF standards and GISTM, followed by a comprehensive gap analysis to address identified shortcomings in social, environmental and technical aspects.

During the implementation phase, several challenges arose, including a shortage of skilled technical personnel to bolster the existing Bokoni TSF management team as well as a scarcity of reputable geotechnical laboratories equipped to handle highly sensitive materials. Initial concerns also surfaced regarding meaningful engagement with downstream communities without causing unnecessary panic.

Bokoni conducted a self-assessment in April 2025 to update actions from the third-party validation conducted by Jones & Wagener in June 2024.

Bokoni is pleased to report the following April 2025 GISTM conformance self-assessment results:

## GISTM conformance results

Of the 77 GISTM requirements, 61 'meet' conformance and eight 'partially meet'. Eight of the requirements are not applicable to this operation. The area that is in partial conformance is related to 'topic 3 – design, construction, operation and monitoring of the tailings facility'. This topic is being addressed in accordance with the updated plan.

## Description of the Consolidated TSF 1-5 TSF

The Bokoni Platinum Mine is located some 80km from Polokwane on the Polokwane-Burgersfort road (R37). The TSFs and water dams are 500m east of the plant on the farms Middelpunt 420 KS and Umkoanestad 419 KS. The mine has two TSFs: Consolidated TSF 1-5 and TSF 6. The return-water dam (RWD) and stormwater dam (SWD) are adjacent to the TSFs, 500m east of the concentrator plant. The Consolidated TSF has been under care and maintenance since June 2018.



# Bokoni Platinum Mine continued

## Consolidated TSF 1-5 public disclosure report continued

Pertinent general information about the operation is detailed below:

**Table 1: TSF general information**

Description	Details
The operation	Bokoni Platinum Mine
TSF operator	Fraser Alexander Tailings
Engineer of record	SRK Consulting (South Africa) (Pty) Ltd
Business unit	ARM platinum division
Magisterial district	Sekhukhune, South Africa
List of tailings storage facilities	Bokoni Consolidated TSF 1-5 and TSF 6
TSF coordinates	Bokoni Consolidated TSF 1-5: 29°87'80.9"E, -24°29'64.4"S
List of water dams	Bokoni return-water dam (RWD); Bokoni stormwater dam (SWD)
Water dam coordinates	RWD: -24°29'95.48"S, 29°87'17.68"E SWD: -24°29'75.82"S, 29°87'00.47"E
Current height	Bokoni Consolidated TSF 1-5: 42m
Current footprint area	Bokoni Consolidated TSF 1-5: 67ha
Current storage	Bokoni Consolidated TSF 1-5: 7 337 994m <sup>3</sup>
Other associated key infrastructure	<ul style="list-style-type: none"> <li>• Silt traps, solution trench</li> <li>• Penstock tower and outlet pipeline</li> <li>• TSF drains (main outlet drain, inner toe drain and elevated curtain drain).</li> </ul>
Method of deposition	Conventional spigot method of deposition used on tailings dams. Spigot line is positioned on the crest of the slimes dam. Tailings are pumped via steel delivery piping to the complex's perimeters, from where they are distributed via steel spigot pipeline ring feed and deposition outlets



Bokoni Mine



# Bokoni Platinum Mine continued

## Consolidated TSF 1-5 public disclosure report continued



*Figure 1: Bokoni Platinum Mine tailings storage facilities and plant*

### Consolidated TSF 1-5 site description and geology, foundation soils and tailings characteristics

Bokoni Platinum Mine lies in the eastern limb of the Bushveld Complex in the Rustenburg layered suite. The geology of this area comprises basic and ultra-basic igneous rocks of the Rustenburg layered suite in the Bushveld Complex. The bedrock comprises norite, pyroxenite and anorthosite and the strata dips west. The plant residue comprises platinum tailings originating from mining and processing the UG2 reef.

### Consequence classification

A multidisciplinary team used the GISTM consequence classification matrix to assess potential downstream impacts in a dam-failure scenario. Using the matrix, the Consolidated TSF at current and final height for both sunny and rainy-day scenarios is classified as extreme.

### A summary of risk assessment findings relevant to the tailings facility

A workplace risk assessment and control procedure was generated to proactively identify, understand and address risks related to operating the Consolidated TSF throughout its life cycle. The major risk identified through a bowtie risk assessment is loss of containment in a TSF. This can occur as a result of poor design and construction, which can lead to weakness and instability in the TSF. Other factors include inadequate slope stability, failure of drainage systems, overtopping, seepage, internal erosion, liquefaction and the impact of

extreme weather events such as heavy rainfall, intense storms, or prolonged periods of precipitation. Additionally, seismic activity such as earthquakes, tremors or blasting impact may cause the facility to lose its strength and stability.

In all cases, comprehensive risk assessments have been completed and identified risks were assessed and evaluated. Mitigation measures have been determined and appropriate controls identified and put in place. Details of the risks and controls are set out in the bowtie risk assessment.

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The dam-breach analysis and inundation study were conducted for Bokoni Platinum Mine to evaluate the potential downstream impact of a breach in the Consolidated TSF. The breach analysis was conducted for the current crest-wall elevation and for the expected final crest-wall elevation. Based on the TSF geometry and material characteristics, critical potential breach locations were identified. The most likely failure modes were modelled and simulated for varying hydrologic conditions.

In the unlikely event of a failure of the Bokoni Consolidated TSF, the tailings release is expected to flow and discharge into the Rapholo River which flows into the Olifants River. Contamination by tailings may extend further downstream of

# Bokoni Platinum Mine continued

## Consolidated TSF 1-5 public disclosure report continued

the facility after breaching. Based on density population maps and extents of inundation resulting from models in this dam-breach analysis, the population at risk was estimated. A study to assess the environmental impact, social impact and local economic impact was conducted to understand the full extent of a failure of the Consolidated TSF.

### Description of the design for all phases of the tailings facility life cycle, including the current and final height

#### Current operations (current height)

The Bokoni Platinum Mine Consolidated TSF is constructed as an upstream embankment facility. The TSF is raised using an approximate overall maximum raise rate of 2m per year. The Consolidated TSF is still under care and maintenance.

The Consolidated TSF was designed to meet recommended industry guidelines for factor of safety (FoS). While operating the tailings facility, the FoS is continually monitored and reviewed through stability analyses. Proactive procedures for managing the TSF have been implemented, implying a 'performance-based' approach has also been applied.

Critical controls have been placed on the following critical aspects of the Consolidated TSF's development. These controls are monitored monthly and complemented by daily, weekly, monthly, quarterly and annual reviews for any major changes or deviations from design assumptions. The reviews are conducted by a multidisciplinary team which involves the Consolidated TSF operator, EoR, environmental specialists, mine safety personnel, RTFE and ITRB.

#### Tailings deposition strategy rate of rise or deposition rates

The Consolidated TSF is currently under care and maintenance and no deposition is taking place.

#### Freeboard and pool control

The Consolidated TSF is designed to comply with the government notice 704 freeboard requirement for a 1:50-year storm plus 800mm. This is verified monthly with accurate surveys of the TSF. The freeboard design is aligned to the GISTM requirements in conjunction with the stability assessment.

#### Wall drainage

Curtain drains have been installed to control the phreatic surface in the Consolidated TSF. The intent is to create a drained, relatively dry structural wall zone (embankment) in the facility. Toe drains are installed around the Consolidated TSF to collect seepage from its base.

#### Slope angle and benches

The side-slopes angles and bench geometry are monitored and maintained regularly to ensure there are no deviations from the design intent during operation.

#### Phreatic surface monitoring

The phreatic surface in the Consolidated TSF is regularly monitored through both standpipe and vibrating wire piezometers (VWPs). This is done through a dashboard that displays live results of VWP readings and monthly readings of standpipes. Access to the Insight Terra dashboard is provided to the relevant Bokoni Platinum Mine TSF operations and management personnel, including the EoR.

#### Penstock structure

The structural and hydraulic integrity of the Consolidated TSF penstock tower and outlet pipeline is regularly monitored for any failures or debris. This is done through regular camera inspection of the entire penstock intake and outfall pipeline.

#### Final height

Closure criteria are the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. Closure criteria are closely related to actual EMP commitments in that, as noted, they are the actions to be taken at closure as agreed with the regulators.

The identified design criteria and constraints will be included in the Bokoni Platinum Mine Consolidated TSF closure study currently underway.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

Annual performance reviews are conducted by the EoR. The following observation was made in the last review:

- Slope stability (FoS): An intensive geotechnical investigation programme to evaluate the characteristics of both the foundation material and tailings has been completed. The stability assessment was conducted with information from the geotechnical field investigation on the material characteristics of both tailings and the foundation
- A comprehensive and appropriate solution has been recommended to address any aspect adversely impacting the stability of the facility.

# Bokoni Platinum Mine continued

## Consolidated TSF 1-5 public disclosure report continued

### Summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures

The following environmental and social findings were noted from the annual performance review:

- Dust fallout: Generally, dust fallout results are monitored monthly for both residential and non-residential thresholds. A dust-suppression system is in place on Consolidated TSF to address identified gaps
- Return-water dam and stormwater dam: The RWD and SWD operating compartments were silted and heavily vegetated. The SWD has been desilted and vegetation removed while the RWD compartment is scheduled to be desilted and vegetation removed in the next financial year
- Bokoni Platinum Mine keeps a register of all environmental and social complaints received from surrounding communities. These are recorded in the grievance register and feedback given to the complainant within 30 days of receipt.

### Summary version of tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan

The EPRP has been drafted and Bokoni has engaged downstream communities to create awareness and educate residents on the potential risks of a failure of the Consolidated TSF. The engagement sessions were attended by local leaders, teachers, children and other members of the communities. Subsequently, the final EPRP was generated in consultation with downstream communities, local authorities and other private emergency services providers like Mine Rescue Services.

The EPRP was shared with local authorities. The EPRP at the Bokoni Consolidated TSF involves early-warning systems, responding to any abnormalities, emergency evacuation plans, evacuation and environmental rapid response plan.

### Dates of most recent and next independent reviews

An independent review of the Bokoni Consolidated TSF was conducted by the ITRB in August 2025. An action plan is in place to address the findings of the ITRB.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

Bokoni Platinum Mine conducts annual rehabilitation, remediation, decommissioning and closure activities assessments to determine financial liability as required by legislation. These assessments are conducted by independent auditors. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements-1.pdf>

Approved by the accountable executive

**Johan Jansen**

*Acting chief executive: ARM Platinum*

4 August 2025



Bokoni Mine



# Bokoni Platinum Mine continued

## Bokoni TSF 6 public disclosure report

Bokoni initiated GISTM implementation in January 2023, beginning with a thorough comparison between current TSF standards and GISTM. This was followed by a comprehensive gap analysis to address identified shortcomings in social, environmental and technical aspects.

Bokoni conducted a self-assessment in April 2025 to update actions from the third-party validation conducted by Jones & Wagener in June 2024.

Bokoni is pleased to report the following April 2025 GISTM conformance self-assessment results:

Pertinent general information about the operation is detailed below:

**Table 1: TSF general information**

Description	Details
The operation	Bokoni Platinum Mine
TSF operator	Fraser Alexander Tailings
Engineer of record	SRK Consulting (South Africa) (Pty) Ltd
Business unit	ARM platinum division
Magisterial district	Sekhukhune, South Africa
List of tailings storage facilities	Bokoni TSF 6
TSF coordinates	Bokoni TSF 6: 29°88'82.4"E, -24°30'03.3"S
List of water dams	Bokoni return-water dam (RWD); Bokoni stormwater dam (SWD)
Water dam coordinates	RWD: -24°29'95.48"S, 29°87'17.68"E SWD: -24°29'75.82"S, 29°87'00.47"E
Current height	Bokoni TSF 6: 23.7m
Current footprint area	Bokoni TSF 6: 62ha
Current storage	Bokoni TSF 6: 3 793 420m <sup>3</sup>
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Silt traps, solution trench</li> <li>• Penstock tower and outlet pipeline</li> <li>• Drains (main outlet drain, inner toe drain and elevated curtain drain).</li> </ul>
Method of deposition	Conventional spigot method of deposition is used on the tailings dam. The spigot line is positioned on the crest of the slimes dam. Tailings are pumped via steel delivery piping to the complex's perimeter, from where it is distributed via steel spigot pipeline ring feed and deposition outlets
TSF wall raise, initial earthworks and method of tailings deposition	TSF 6 is an upstream wall raised facility. Initial earthworks comprise a compacted clay starter wall and toe wall for initial deposition during periods of a high rate of rise (RoR)

### GISTM conformance results

Of the 77 GISTM requirements, 61 'meet' conformance and eight 'partially meet'. Eight of the requirements are not applicable to this operation. The area that is in partial conformance is related to 'topic 3 – design, construction, operation and monitoring of the tailings facility'. This topic is being addressed in accordance with the updated plan.

### Description of TSF 6

The Bokoni Platinum Mine is located some 80km from Polokwane on the Polokwane-Burgersfort road (R37). The TSFs and water dams are 500m east of the Plant on the farms Middelpunt 420 KS and Umkoanestad 419 KS. The mine has two TSFs: Consolidated TSF 1-5 and TSF 6. The return-water dam (RWD) and stormwater dam (SWD) are

# Bokoni Platinum Mine continued

## Bokoni TSF 6 public disclosure report continued

adjacent to the TSFs, around 500m east of the concentrator plant. TSF 6 was recommissioned for operations in November 2023.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

Annual performance reviews are conducted by the EoR. The following observation was made in the last review:

- Slope stability (FoS): An intensive geotechnical investigation programme to evaluate the characteristics of both the foundation material and tailings has been completed. The stability assessment was conducted with information from the geotechnical field investigation on the material characteristics of both tailings and the foundation
- A more comprehensive and appropriate solution has been recommended to address any aspects adversely impacting the stability of the facility.

### Summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

The following environmental and social findings were noted from the annual performance review:

- Dust fallout: Generally, dust fallout results are monitored monthly for both residential and non-residential thresholds. Bokoni Platinum Mine has installed and commissioned a new dust-suppression system on TSF 6 to address identified gaps
- Return-water dam and stormwater dam: The RWD and SWD operating compartments were silted and heavily vegetated. The SWD has been desilted and vegetation removed while the RWD compartment is scheduled to be desilted and vegetation removed in the next financial year
- Bokoni Platinum Mine keeps a register of all environmental and social complaints received from surrounding communities. These are recorded in the grievance register and feedback given to the complainant within 30 days of receipt.

### Summary version of tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan

The EPRP has been drafted and Bokoni has engaged downstream communities to create awareness and educate residents on the potential risks of a failure of its TSF 6. The engagement sessions were attended by local leaders, teachers, children and other members of the communities. Subsequently, the final EPRP was

generated in consultation with downstream communities, local authorities, and other private emergency services providers like Mine Rescue Services. The EPRP was shared with local authorities. The EPRP at Bokoni TSF 6 involves early-warning systems, responding to any abnormalities, emergency evacuation plans, evacuation and environmental rapid response plan.

#### Trigger action response plan (TARP)

The EoR has developed a TARP for Bokoni Platinum Mine that gives guidance on the type of response required for an event that could trigger an emergency. The TARP is a tool for managing crucial situations from the Bokoni operations' safety point of view. The TARP document sets out conditions or triggers, with corresponding actions that managers and supervisors must follow when those trigger events occur. The purpose of TARPs is to provide guidance and clarity when a situation deviates from the original plan or where there is a material change in conditions that could be hazardous.

#### Dates of most recent and next independent reviews

An independent review of Bokoni TSF 6 was conducted by the ITRB in August 2025. An action plan is in place to address the findings of the ITRB.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

Bokoni Platinum Mine conducts annual rehabilitation, remediation, decommissioning and closure activities assessments to determine financial liability as required by legislation. These assessments are conducted by independent auditors. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements-1.pdf>

Approved by the accountable executive

**Johan Jansen**

*Acting chief executive: ARM Platinum*

4 August 2025

## **Nkomati Nickel Mine**

Nkomati Nickel Mine is owned by ARM.

### **Locality**

Nkomati Nickel Mine lies around 300km east of Johannesburg in Mpumalanga province, South Africa. Situated at latitude 25°40"S and longitude 30°30"E, the mine is accessed via the national N4 highway between Johannesburg and Machadodorp, the R341 provincial road and R351 tarred road.



# ARM Platinum



# Contents

## Co-disposal

Nkomati Co-disposal TSF public disclosure
Description of the Nkomati Co-disposal TSF
The consequence classification
A summary of risk assessment findings relevant to the TSF
A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow-failure scenarios
A description of the design for all phases of the tailings facility life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## Onverwacht

Nkomati Onverwacht TSF public disclosure
Description of the Nkomati Onverwacht TSF
The consequence classification
A summary of risk assessment findings relevant to the TSF
A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow-failure scenarios
A description of the design for all phases of the tailings facility life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

To assess implementation of GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

### Nkomati Co-disposal TSF public disclosure

Nkomati started implementing GISTM in August 2020.

The co-disposal TSF is currently under care and maintenance. The first step was to conduct a gap analysis between our current TSF standards and GISTM. This was followed by a detailed plan to address the social, environmental and technical gaps identified. Some of the challenges faced in implementation were due to the shortage of available technical skills in the field of tailings management. There were also initial concerns on how meaningful engagement with downstream communities could be handled without causing undue concern.

Following the third-party review conducted by Jones & Wagener in July 2023, Nkomati conducted its first annual self-assessment in April 2024.

Nkomati is pleased to report the following 2025 GISTM conformance self-assessment results:

### GISTM conformance results

Of the 77 GISTM requirements, 63 'meet' conformance and four 'partially meet'. No requirements are classified as 'does not meet'. Ten requirements are not applicable to the Nkomati Co-disposal TSF.

The areas in partial conformance relate to 'topic 3 – design, construction, operation and monitoring of the tailings facility' and 'topic 4 – management and governance' and are expected to be in conformance as per plan.

Additional geotechnical investigations are currently underway to assess the need for implementing ALARP measures.

# Nkomati Nickel Mine continued

## Co-disposal TSF public disclosure report continued

### Description of the Nkomati Co-disposal TSF

Nkomati Nickel Mine (NNM) is located on Slaaihoek, Nkomati and Onverwacht farms in the eastern escarpment of Mpumalanga. This is in the Uitkomst complex some 20km north of Badplaas, 47km west of Barberton and 107km south-west of Nelspruit in the Machadodorp area. The Co-disposal TSF lies 6km from the processing plant.

- The facility was designed by Geo Tail and commissioned in 2009. Due to the steep topography of the impoundment and increased production for phase 2, the deposition was initially split between two compartments. Waste rock was placed mechanically to build the first-phase impoundment wall for the initial 100 000 tonnes per month tailings production from the PCMZ (chromatic peridotite mineralised zone) plant. A second compartment was constructed with waste rock to increase overall capacity and accommodate

most of the PCMZ plant tailings and CWP (chrome wash plant) tailings from the phase 2 expansion project. The thickened slurry was pumped to both compartments which later combined to form a single compartment

- The capacity of the compartments was designed so that the two would attain the same elevation at 1 425mamsl, after which deposition continued in a single combined compartment, impounded by the downstream and upstream waste rock-constructed embankments
- The facility has an intended design life of 20 years and a final elevation of 1 445mamsl. Although tailings are currently only at 1 427mamsl, the perimeter embankments have been raised to the final elevation, providing ample freeboard while the facility is under care and maintenance.

**Table 1: Co-disposal TSF general information**

Description	Details
The operation	Nkomati Nickel Mine
TSF operator	Stefanutti Stocks (Pty) Ltd
Engineer of record	Bulwark Consulting Engineers
Business unit	ARM Technical Services
Magisterial district	Gert Sibande district, Mpumalanga province, South Africa
List of tailings storage facilities	Co-disposal TSF
TSF coordinates	25°45'21.22"S 30°38'13.42"E
TSF wall raise, initial earthworks and method of tailings deposition	Full impoundment facility; perimeter walls constructed with compacted waste rock
Current height	74.5m
Current footprint area	100ha
Current storage	28 834 323m <sup>3</sup>
Method of deposition	Conventional spigot method of deposition employed on tailings facility. Slurry delivery pipeline with spigot outlets positioned on the crest of perimeter walls

# Nkomati Nickel Mine continued

## Co-disposal TSF public disclosure report continued

### Site, tailings and foundation soils characteristics

The regional geology comprises the Uitkomst complex, composed of layered ultramafic to mafic rocks, hosting Ni-Cu-Cr-Co-PGM mineralisation. This layered complex was emplaced into the basal units of the westward-dipping Transvaal sequence, underlain by the Archaean Nelshoogte granite.

The mining area is characterised by its undulating topography and steep valley sides; mainly due to its position below the escarpment and because of the large number of mountain streams and tributaries cutting through the landscape. The main valley in the Nkomati Mine area is north-west-southeast trending and drained by the Gladde spruit River, which flows south of the Co-disposal TSF and into the Inkomati River system. Several tributaries have been identified that flow into the Mngubhudla River, which is around 1km west of the TSF. The Vygeboom dam is south-west of the Co-disposal TSF.

The site is underlain by the gneiss of the Nelshoogte pluton. In general, the pluton is deeply weathered to depths of over 25m, with hard rock only encountered at depths of over 30m below surface. In the vicinity of the return-water dam, the depth of weathering of the gneiss has been limited to 5m to 10m. The gneiss has been extensively intruded by diabase (ie pre-Karoo dolerite).

The transported soils on-site mainly consist of topsoil, hill wash and alluvium. Residual soils on the site comprise diabase and gneiss. Two types of bedrock, gneiss and diabase, were encountered during the site investigation.

Except in lower-lying areas within the well-defined drainage channels, groundwater seepage was not encountered in investigation test pits. Groundwater seepage is expected to be maintained in these low-lying areas around the various streams. Seepage is expected to increase concurrent with and during rainy seasons.

The residual gneiss was identified as providing the best material for constructing the TSF starter walls and for general engineered fill.

The Malmani subgroup 'meta' dolomite is more prominent in the pit 1 and 2 areas, with Pretoria group sediments (Timeball Hill formation) outcropping near pit 3.

### Consequence classification

The GISTM consequence classification matrix was used to assess potential downstream impacts in a dam-failure scenario. Using this matrix, the Co-disposal TSF was classified as significant.

### Summary of risk assessment findings relevant to the TSF

A workplace risk assessment and control procedure was generated to proactively identify, understand and address risks related to operating the TSF throughout its life cycle.

Risks identified for the facility are wall failure resulting from inadequate structural stability; wall failure due to internal or external erosion; wall failure due to foundation weakness; wall failure due to liquefaction; failure due to mechanical failure; and failure due to overtopping.

In all cases, comprehensive risk assessments have been carried out and identified risks assessed. Mitigation measures have been determined and appropriate controls identified and put in place. Details of the risks and controls are set out in the bowtie risk assessment.

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The dam-break analysis study determined affected areas that may be impacted by a (hypothetical) breach of the Co-disposal TSF. The breach analysis was conducted for a tailings elevation of 1 428.5mamsl and the final crest-wall elevation of 1 445.0mamsl.

Based on the TSF geometry, wall configuration, surrounding topography, downstream infrastructure and community settlements, critical potential breach locations were identified. The most likely failure modes were modelled: piping, collapse and liquefaction (which were simulated accordingly for rainy-day hydrologic conditions). A sensitivity analysis of tailings material parameters and certain input parameters was conducted to determine the worst-case downstream impact.

This study also assessed the resulting flow depth, flow velocity and estimated arrival time at selected identified areas that could be affected by a TSF breach.

Results of the study have been used to inform the mine emergency preparedness and response plan (EPRP).

### Description of the design for all phases of the tailings facility life cycle, including the current and final height

The Co-disposal TSF is impounded to final design height with waste rock. The current maximum height is 74.5m. During operation, slurry from the PCMZ and CWP process plants was pumped into the basin created within the waste-rock walls. An open-end slurry deposition method was used to create a beach that slopes away from the perimeter embankments to a centralised supernatant pool. The supernatant is pumped from the pool to the HDPE-lined silt trap and return-water dam south-west of the



# Nkomati Nickel Mine continued

## Co-disposal TSF public disclosure report continued

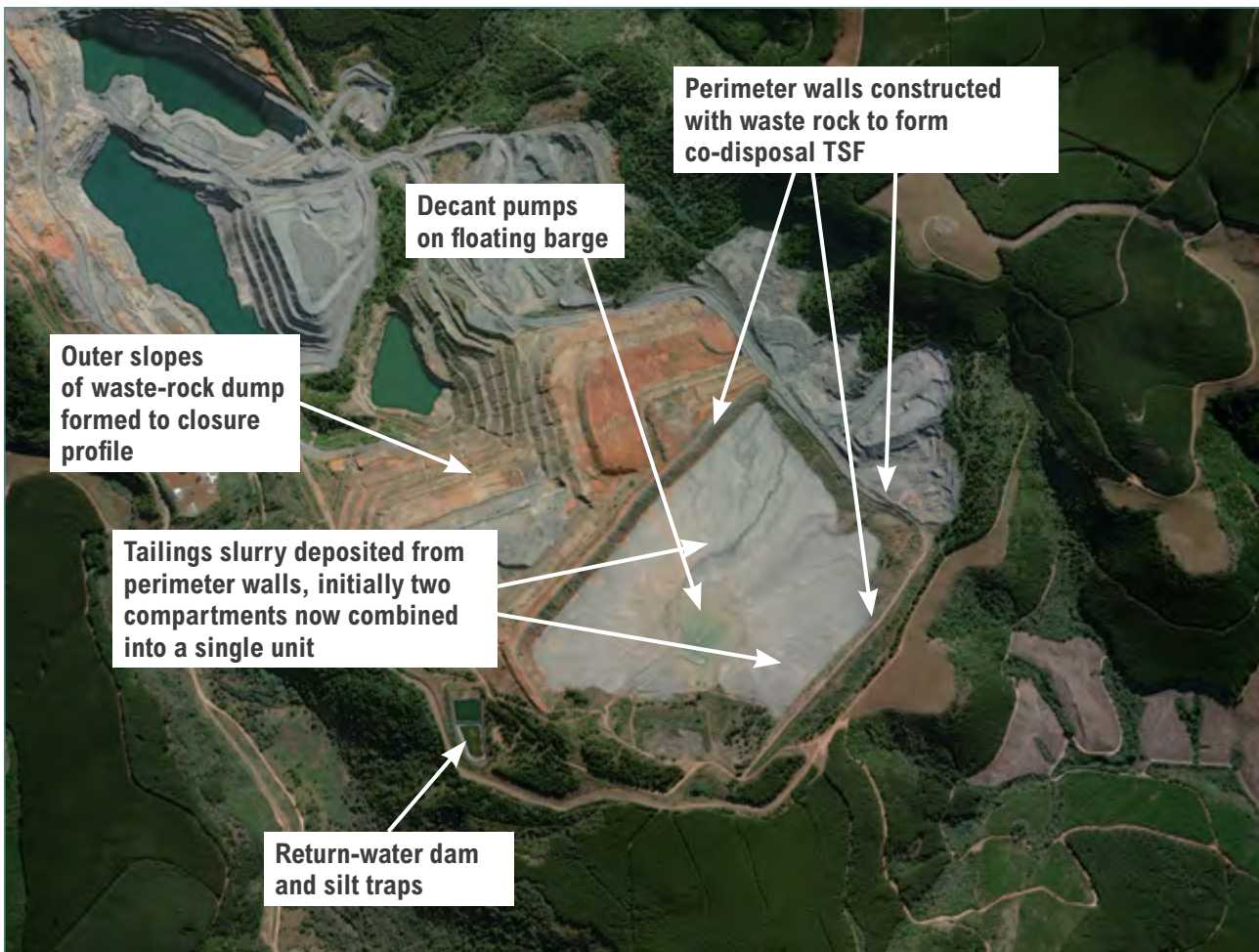


Figure 1-2: Co-disposal TSF layout

facility. Wall seepage as well as any groundwater flows are collected and report to a downstream sump (downstream portion of the original open-pit 2). The current storage volume in the Co-disposal TSF is 28 834 323m<sup>3</sup>.

The waste-rock impoundment configuration of the facility forms an inherently stable structure.

### Freeboard and pool control

The Co-disposal TSF is designed to comply with the government notice 704 freeboard requirement for a 1:50-year storm plus 0.8m. The development of perimeter walls to their final height provides compliant freeboard for the life-of-mine. The position of the supernatant pool is contained within the beached tailings and maintained central to the decant pumps.

### Stormwater management

Stormwater runoff from the outer slopes of the waste-rock walls is designed to be collected and discharged in a controlled manner. There is no upstream catchment

requiring diversion channels to direct stormwater away from the TSF.

### Slope angle and benches

The side-slopes angles and bench geometry are monitored and maintained regularly to ensure there are no deviations from the design intent during operation.

### Decant structure

Supernatant water is removed from the facility via floating barge-mounted pumps delivering into a HDPE pipeline discharging to the return-water dam.

### Current operation (current height)

NNM has the following monitoring regime for the Co-disposal TSF:

- Weekly inspection of underdrains, side slopes, any incidents/accidents, freeboard, position and surface area of pool, seepage, pipeline condition, pump condition, return-water dam.

# Nkomati Nickel Mine continued

## Co-disposal TSF public disclosure report continued

### Final height design

Closure criteria are the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. The proposed closure criteria for the Co-disposal TSF are closely related to EMP commitments as they include actions to be implemented at closure as agreed with regulators.

Concurrent development of the closure profile of the outer slopes of the waste-rock dump has been integrated into the operation of the Co-disposal facility.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

No material findings (defined as high to very high risks) were identified in the 2024 annual performance review. The following were noted from this review:

- Erosion gullies on the outer side slopes of the waste-rock dump of the Co-disposal TSF need to be regularly repaired
- Some benches and the final perimeter embankment crest need ongoing maintenance, but basin freeboard is acceptable, ie the pool is remote from perimeter walls.

The following recommendations were made for the TSF:

- Complete geotechnical investigations required for closure plan
- Undertake advanced stability analysis following completion of geotechnical investigations.

No notable stability concerns have been raised over the life of the facility. Some low to medium risks have been identified and are being addressed (for example ongoing checking of dust and groundwater monitoring data).

### Summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

The following environmental and social findings were noted from the annual performance review:

- Review of groundwater monitoring and dust monitoring data
- Desilt return-water dam and reinstate sections of damaged HDPE liner
- Nkomati Nickel Mine maintains a register of all environmental and social complaints received from surrounding communities. These are recorded in the grievance register and feedback given to the complainant within 30 days.



Figure 4-1: Topography local to the co-disposal TSF used for the dam break impact assessment

# Nkomati Nickel Mine continued

## Co-disposal TSF public disclosure report continued

**Summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event**

### Nkomati TSF inundation zones

NNM extensively engaged downstream communities to create awareness and educate them on the potential risks of a TSF breach. The sessions were attended by local leaders, teachers, children and other members of the communities.

Following on from this engagement, an EPRP was developed in consultation with downstream communities, local authorities and other private emergency services providers, eg Mine Rescue Services.

### Trigger action response plan (TARP)

NNM has developed a TARP that gives guidance on the type of response required for an event that could trigger an emergency. The TARP is a tool used for managing crucial situations from the NNM operations' safety point of view. It sets out certain conditions or triggers with corresponding actions that NNM managers and supervisors must follow when those trigger events occur. The purpose of TARPs is to provide guidance and clarity when a situation deviates from the original plan or where there is a material change in conditions that could be hazardous.

### Dates of most recent and next independent reviews

An independent review of the facility was conducted by Independent Tailings Review Board (ITRB) in July 2025.

**Annual confirmation that the operator has adequate financial capacity to cover estimated costs**

NNM conducts annual rehabilitation, remediation, decommissioning and closure liability assessments to determine financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>

Approved by the accountable executive

**Thando Mkatshana**

*Chief executive: ARM Technical Services*

4 August 2025



# Nkomati Nickel Mine continued

## Onverwacht TSF public disclosure report

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

Nkomati started implementing GISTM in August 2020.

The Onverwacht TSF is currently under care and maintenance. The first step was to conduct a gap analysis between current TSF standards and GISTM. This was followed by a detailed plan to address social, environmental and technical gaps identified. Some of the challenges faced in implementation were due to the shortage of available technical skills in the field of tailings management. There were also initial concerns on how meaningful engagement with downstream communities could be handled without causing undue concerns.

Following the third-party review conducted by Jones & Wagener in July 2023, Nkomati conducted its first annual self-assessment in April 2024.

Nkomati is pleased to report the following April 2025 GISTM conformance self-assessment results:

### GISTM conformance results

Of the 77 GISTM requirements, 64 'meet' conformance and three 'partially meet'. No requirements are classified as 'does not meet'. Ten requirements are not applicable to this asset.

The areas in partial conformance relate to 'topic 3 – design, construction, operation and monitoring of the tailings facility' and 'topic 4 – management and governance'. These are expected to be in conformance as per plan.

Additional geotechnical investigations are currently underway to assess the need for implementing ALARP measures.



Figure 1-1: Onverwacht TSF

# Nkomati Nickel Mine continued

## Onverwacht TSF public disclosure report continued

### Description of the Nkomati Onverwacht TSF

Nkomati Nickel Mine is located on Slaaihoek, Nkomati and Onverwacht farms in the eastern escarpment of Mpumalanga. This is in the Uitkomst complex some 20km north of Badplaas, 45km west of Barberton and 107km south-west of Mbombela in the Machadodorp area.

The Onverwacht TSF was designed to accommodate a monthly production rate of 412 000 tonnes per month MMZ (Main Mineralised Zone), 480 000 tonnes per month PCMZ and 30 000 tonnes per month of CWP.

The facility is 14km south-east of the main mine site at 25°49'53.17"S and 30°38'39.99"E. The TSF was started in 2010 and is currently inactive.

The final design elevation for Onverwacht TSF is 1 180mamsl. Currently, the top of the containment wall is at an elevation of 1 165mamsl.

The Onverwacht TSF was initially constructed as a cross-valley facility in 2009, with completion in February 2010. This was part of the Nkomati expansion operation to receive tailings from the MMZ plant. The TSF is 14km

south and at an elevation 300m below the Nkomati process facility. Two parallel 350mm-diameter pipelines deliver tails from the plant to the Onverwacht impoundment. The tailings pipelines are HDPE-lined spiral-welded steel pipe, constructed using 40m lengths of pipes coupled together. The design of the facility provides for a final capacity of 90 million tonnes of tailings deposition. An engineered starter dam was constructed to a height of 42m at the low point of the valley, in which the embankment was constructed, with two lifts in the middle section of the dam, as follows:

- The first consists of a wide base, situated in the lower portion of the valley, with a cross-sectional width of some 190m and a height of 17.5m at the tallest point
- The second lift has a cross-sectional width of 95m and height of 24.5m
- The crest length of the starter dam was 980m. This engineered embankment used over 1 million cubic metres of compacted fill. Curtain and toe drains were installed at the starter embankment and these drain under gravity to a seepage collection pond downstream of the main embankment. Seepage is collected and pumped to either the return-water dam (RWD) or TSF as required.

**Table 1: TSF general information**

Description	Details
The operation	Nkomati Nickel Mine
TSF operator	Stefanutti Stocks (Pty) Ltd
Engineer of record	Bulwark Consulting Engineers
Business unit	ARM Technical Services
Magisterial district	Gert Sibande district, Mpumalanga province, South Africa
List of tailings storage facilities	Onverwacht TSF
TSF coordinates	25°49'53.17"S 30°38'39.99"E
List of water dams	Onverwacht return-water dam (RWD)
Water dam coordinates	25°49'25.33"S 30°38'31.14"E
TSF wall raise, initial earthworks and method of tailings deposition	Open-ended dropper pipe deposition up to elevation 1 135m for two years Upstream cycloning method until 1 150m elevation Cycloning from 1 150m elevation until final elevation 1 178maslm
Current height	63m
Current footprint area	130ha
Current storage	37 294 451m <sup>3</sup> Onverwacht RWD: 250 000m <sup>3</sup>
Method of deposition	In accordance with the design, cycloning deposition is used for the latest phase of development of the tailings dam wall. The tailings delivery line and cyclone feed supply lines are positioned on the crest of the facility

# Nkomati Nickel Mine continued

## Onverwacht TSF public disclosure report continued



Figure 4-1: Onverwacht TSF areas of interest

The design life of the tailings facility was initially 18 years. However, as production rates in the processing plants increased beyond the initial design, the deposition plan has been adjusted. The remaining life of the Onverwacht TSF was reported as 10 years, as of 2018, which provides adequate tailings deposition capacity for the remaining life-of-mine which considered mine production until 2026.

The deposition method results in supernatant water flowing from the dam wall towards the tails water pool at the head of the valley, positioning it against the native topography and remote from the wall. From the pool, a floating barge pumps water to the return-water dam, which is in a valley upstream to the north-east of the TSF. From here, the water is recycled back to the plant via a 14km long-steel return-water pipeline.

### Site, tailings and foundation soils characteristics

The mining area is characterised by its undulating topography and steep valley sides; mainly due to its position below the escarpment and because of the many mountain streams and tributaries cutting through the

topography. The main valley in the Nkomati Mine area is north-west/south-east trending and drained by the Gladdespruit River, which flows south of the Onverwacht TSF and into the Inkomati River system. Several tributaries have been identified that flow into the Mngubhudla River, which is some 1km west of the TSF. The Vygeboom dam is south-west of the Onverwacht TSF.

According to the geological report, the site is underlain by the gneiss of the Nelshoogte pluton. In general, the pluton is deeply weathered to depths in excess of 25m, with hard rock only encountered at over 30m below surface. In the vicinity of the return-water dam, the depth of weathering of the gneiss has been limited to 5m to 10m. The gneiss has been extensively intruded by diabase (ie pre-Karoo dolerite).

The transported soils on-site mainly consist of topsoil, hillwash and alluvium. Residual soils on the site consist of diabase and gneiss. Two types of bedrock were encountered during the investigation, namely gneiss and diabase.



# Nkomati Nickel Mine continued

## Onverwacht TSF public disclosure report continued

Except in lower-lying areas within the well-defined drainage channels, groundwater seepage was not encountered in the formed test pits.

The alluvium, gulleywash and residual diabase soils are generally of poor quality and were considered unsuitable to use in constructing the TSF starter wall. The residual gneiss provided the best soil for use in constructing the starter wall and for general engineered fill. Reworked residual gneiss can also be used, provided the uppermost zone of these soils is discarded.

The Uitkomst complex comprises layered ultramafic to mafic rocks, hosting Ni-Cu-Cr-Co-PGM mineralisation. This layered complex was emplaced into the basal units of the westward-dipping Transvaal sequence, underlain by the Archaean Nelshoogte granite.

The Malmani subgroup 'meta' dolomite is more prominent in the mining pit 1 and 2 areas, with Pretoria group sediments (Timeball Hill formation) outcropping near pit 3, all adjacent to the run-of-mine processing plants.

### Consequence classification

A multidisciplinary GISTM consequence classification matrix was used to assess potential downstream impacts in a dam-failure scenario. Using this matrix, the TSF was classified as extreme.

### Summary of risk assessment findings relevant to the TSF

A workplace risk assessment and control procedure was generated to proactively identify, understand and address risks related to operating the TSF throughout its life cycle.

Risks identified for the Onverwacht TSF are wall failure resulting from inadequate structural stability; wall failure due to internal or external erosion; wall failure due to foundation weakness; wall failure due to liquefaction; failure due to mechanical failure; and failure due to overtopping.

In all cases, comprehensive risk assessments have been carried out, with appropriate controls identified and put in place. Details of risks and controls are set out in the bowtie risk assessment.

No notable stability concerns have been raised over the life of the facility. Some low to medium risks have been identified and are being addressed (an example is ongoing checking of dust and groundwater monitoring data).

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The dam-breach analysis study determined affected areas that may be impacted by a hypothetical breach of the Onverwacht TSF. This study also assessed the resulting flow depth, flow velocity and estimated arrival time at selected identified affected areas should the TSF breach. The results of the study are used to inform the mine's emergency preparedness and response plan.

The most likely failure modes were modelled: overtopping, collapse and liquefaction (which were simulated accordingly for rainy-day hydrologic conditions). Liquefaction failure was expected to result in the most severe impact downstream.

Due to the potential variability of the tailings material properties and uncertainty of some input parameters, a sensitivity analysis was conducted. Results of the sensitivity of these parameters (including released volume, volumetric concentration of solids, Manning's surface roughness coefficients and time-to-breach peak flow) indicate that the largest variation in the extent of inundation is as a result of variation in the total released volume.

### Description of the design for all phases of the tailings facility life cycle, including the current and final height

The Onverwacht TSF is a valley-type facility with a current height of 63m. Slurry from the MMZ, PCMZ and chrome process plants were historically pumped to this facility.

Deposition originally took place behind a 42m engineered starter embankment. An upstream cyclone deposition method was implemented above the starter-wall crest. The current storage volume is 37 294 451m<sup>3</sup>.

Supernatant water is pumped from the pool, within the main drainage course, to the HDPE-lined return-water dam upstream of the facility. A downstream scavenger borehole system has been implemented to control the potential pollution plume.

Critical controls have been placed on the following aspects of the TSF's development:

- Rate of rise or deposition rates
- Generation of excess pore pressure in the tailings body and foundation material
- Elevation of phreatic surfaces
- Densification and benefits of desiccative drying
- Cycling times of some 30 days that assist in the safe construction of deposit walls

# Nkomati Nickel Mine continued

## Onverwacht TSF public disclosure report continued

- Freeboard and pond location:
  - The freeboard is designed for a 1:50-year storm plus 0.8m. The freeboard is verified quarterly with an accurate lidar survey of the site. Tailings are deposited so that the accumulation of fines near the outer perimeter of the TSF is minimised through the cycloned deposition method which facilitates segregating coarse tailings from fines.

Regular inspections and reviews are performed on the following aspects of TSF development and reviewed by the EoR for any major changes or deviations from design assumptions:

- Slurry density; temperature; evaporation; RWD levels; piezometer levels and trends; drain flows and trends; surface-water quality; groundwater quality; update on slope stability FoS by limit equilibrium analysis methods, particle size distribution, tailings characteristics.

### Current operation (current height)

The Onverwacht TSF is an embankment facility. Its development progresses in thin lifts to control the rate of rise. The deposition method results in supernatant water flowing from the dam wall towards the tails water pool at the head of the valley, positioning it against the native topography and remote from the wall. From the pool, a floating barge pumps water to the RWD, which is in a valley upstream to the north-east of the TSF.

NNM has the following monitoring regime for Onverwacht TSF:

- Weekly inspection of:
  - Underdrains
  - Solution trenches
  - Catchment paddocks
  - Side slopes
  - Incidents/accidents that occurred
  - Freeboard, beach, pool area
  - Seepage
  - Valves
  - Piezometers
  - Return-water dam.

Records of flow data are also kept so any deviations can be identified.

- Monthly structural stability assessments consider:
  - Deposition rate
  - Slurry density (average)
  - Minimum freeboard
  - Pool size or volume
  - Return-water storage capacity
  - Rainfall (storm event)
  - Drain flows.

### Final height design

Closure criteria are the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. The proposed closure criteria for the TSF are closely related to EMP commitments, ie actions at closure as agreed with regulators.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

No material findings (defined as high to very high risks) were identified in the 2025 annual performance review. The low to medium risks identified are being addressed so that material findings do not occur.

A focus area for the current care and maintenance phase is to continue implementing required erosion-control measures, ie stormwater control measures on existing embankment crest.

The following were noted from the annual performance review:

- Erosion-control measures need to be maintained for the top surface of the valley embankment
- Dust suppression needs to be implemented to control nuisance dust on the top surface of the TSF.

The basin freeboard is acceptable.

The following recommendations were made for the Onverwacht TSF:

- Investigate the feasibility of increasing design criteria for stormwater diversion trenches to 1:10 000-year storm event
- Engineer the valley embankment crest and rehabilitate upstream side slope
- Implement irrigation system for dust control in the basin.

### Summary of material findings of environmental and social monitoring programme, including implementation of mitigation measures

The following environmental and social findings were noted from the annual performance review:

- NNM received a complaint about dust from the exposed crest and basin. This was recorded in the grievance register and immediate action taken to address the issue and provide feedback to the complainant
- Recommendation to review dust-monitoring data was made due to dust from the basin.

# Nkomati Nickel Mine continued

## Onverwacht TSF public disclosure report continued

### Summary version of tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Onverwacht TSF inundation zones

NNM extensively engaged downstream communities to create awareness and educate residents on potential risks of a TSF breach. The sessions were attended by local leaders, teachers, children and other members of the communities. Subsequently, an emergency preparedness and response plan (EPRP) was developed in consultation with downstream communities, local authorities and other private emergency services providers like Mine Rescue Services.

#### Trigger action response plan (TARP)

NNM has developed a TARP that gives guidance on the type of response required in an event that could trigger an emergency. The TARP is a tool used for managing crucial situations from the NNM operations' safety point of view. It sets out a set of conditions or triggers with corresponding actions that NNM managers and supervisors must follow when those trigger events occur. The purpose of TARPs is to provide guidance and clarity when a situation deviates from the original plan or where there is a material change in conditions that could be hazardous.

### Dates of most recent and next independent reviews

An independent review of the facility was conducted by Independent Tailings Review Board (ITRB) in July 2025.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

NNM conducts annual rehabilitation, remediation, decommissioning and closure-liability assessments to determine financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link:  
<https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>

Approved by the accountable executive

**Thando Mkatshana**

*Chief executive: ARM Technical Services*

4 August 2025



## **Khumani Iron Ore Mine**

ARM's attributable beneficial interest at Khumani Iron Ore Mine is 50%. The other 50% is held by Assore (Pty) Ltd.

### **Locality**

The mine lies on both sides of the N14 highway, 20km south of the town of Kathu. Khumani Mine is situated on the farms Parson 564, Bruce 544, King 561 and Mokaning 560. Khumani is some 200km north-west of Kimberley in the Northern Cape. The Khumani open-pits are adjacent to, and south-east of, Kumba Iron Ore's Sishen Mine. Khumani Mine is located at latitude 27°45'00"S and longitude 23°00'00"E.



# ARM Ferrous

# Contents

## Khumani PDF

Khumani Mine public disclosure on the Khumani PDF
Description of the Khumani Mine TSF
The consequence classification
A summary of risk assessment findings relevant to the TSF
A summary of impact assessments and of human exposure and vulnerability to TSF credible flow-failure scenarios
A description of the design for all phases of the TSF life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to as low as reasonably practicable
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the TSF EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## Khumani Mine public disclosure on the Khumani PDF

Khumani Mine began implementing GISTM in August 2020. The first step was to conduct a gap analysis between current tailings facility standards and GISTM. This was followed by a detailed implementation plan to address identified social, environmental and technical gaps.

Khumani Mine conducted a compliance audit in November 2022 (led by an environmental lawyer), and the third-party validation was done by Jones & Wagener in July 2023. This was followed by interim self-assessments on all the 'partially meet' requirements.

Khumani Mine is pleased to report the following GISTM conformance results as assessed by Jones & Wagener in 2023 and updated to reflect the most recent self-assessment done in March 2025.

## GISTM conformance results

Of the 77 GISTM requirements, 68 'meet' conformance and two 'partially meet'. No requirements are classified as 'does not meet'. Seven requirements are not applicable to this asset.

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

The 'partially meet' requirements fall under the design, construction, operation and monitoring topic, with the tailings facility closure design study being the only subject not yet completed. The closure plan is developed in three stages, as each stage needs to inform the scope of the next phase. Completion date is set for August 2025, but this will depend on timely feedback received from the Department of Water and Sanitation during phase 1.

## Description of the Khumani Mine TSF

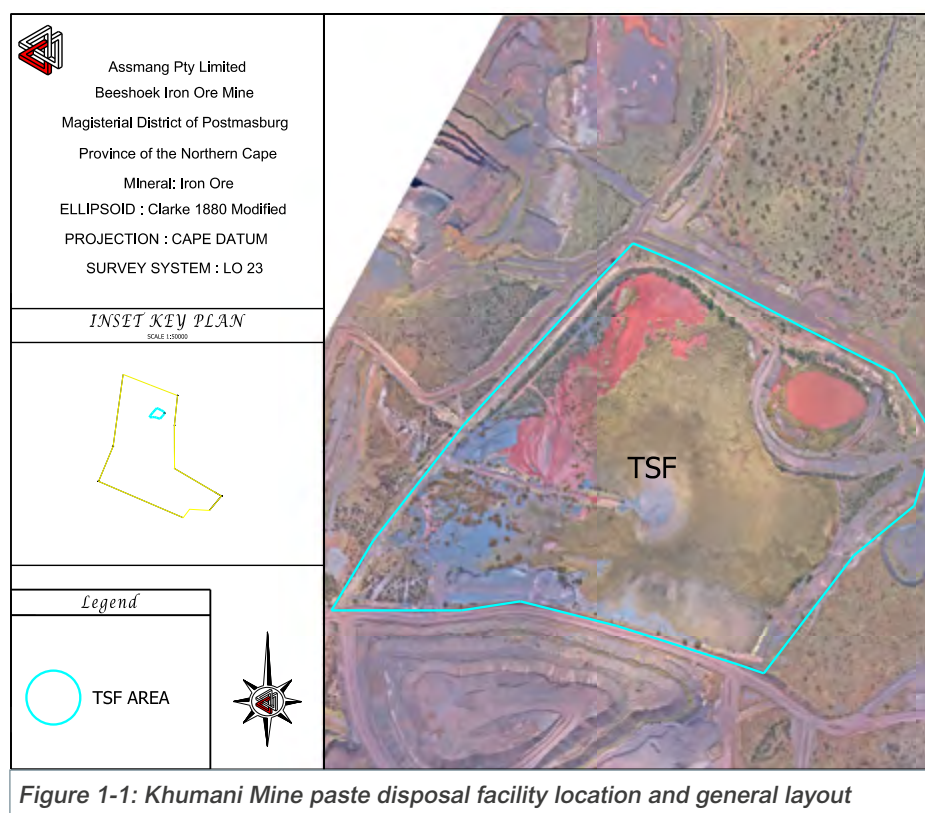
The Khumani Mine (KHM) does not have a traditional TSF. Tailings are first dewatered (through primary and secondary paste thickeners) to ensure that the material deposited onto the facility has a high percent of solids and low water content, hence the thickened tailings, paste-like consistency, and use of a paste disposal facility (PDF), which lies on the farm King to the north of the King Mine open-pit operations and 30km south of Kathu (refer figure 1-1).

The KHM PDF provides for containment of thickened tailings behind the principal impoundment embankment, which is an engineered broad valley-type structure across a sloping hillside valley, creating an impoundment with a half-elliptical shape. The PDF was constructed in phases: phase 1 followed a downstream construction method and phase 2 (current methodology) occurs independently on compartments 1 and 2, using an upstream construction method. The PDF has a design life of 17 years.

The facility has a primary return-water dam (RWD1) to store any excess water decanted off the PDF basins and another return-water dam on standby. Water from the RWDs is pumped back to the Parson Plant Operations to optimise recovery. Pertinent general information about the operation is detailed in table 1.

# Khumani Iron Ore Mine continued

## Khumani PDF public disclosure report continued



**Table 1: PDF general information**

Description	Details
The operation	Khumani Iron Ore Mine
PDF operator	Stefanutti Stocks Inland
Engineer of record	ARQ Geotech
Business unit	ARM ferrous division
Magisterial district	John Taolo Gaetsewe district municipality, Gamagara local municipality, Northern Cape, South Africa
List of tailings storage facilities	Khumani Mine paste disposal facility
PDF coordinates	Long: 23°0'43.51"E Lat: 27°50'21.36"S
List of water dams	Return-water dams 1 and 2
Current height	Khumani PDF: 23m (1 233mamsl)
Current footprint area	Khumani PDF: 170ha
Current storage	Khumani PDF: 15.9 million m <sup>3</sup>
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Return-water dam, silt trap</li> <li>• Standpipes, vibrating wire piezometers, underdrains</li> <li>• Deposition pipelines</li> <li>• Process and stormwater primary and secondary decanting systems</li> <li>• Return-water pipelines.</li> </ul>
Method of deposition	Multiple open-end delivery stations are used to distribute non-segregating tailings into the basin of the PDF which is split into four compartments (1, 2, 3a and 3b)



# Khumani Iron Ore Mine continued

## Khumani PDF public disclosure report continued

### Site description and geology, foundation soils and tailings characteristics

The area of the KHM PDF is underlain by sedimentary and metamorphic rocks of the Gamagara formation, Postmasburg group and Griqualand-West supergroup. The Postmasburg group of the Griqualand-West sequence is considered to be broadly contemporaneous with the Pretoria group.

The underlying rocks in this area mostly comprise quartzite, flagstone, shale, chert breccia and interlayered dolomite and chert at depth. The ferruginous and manganiferous shale and chert have been mineralised in places to form hematite. Although shale, quartzite and chert were intersected in the boreholes drilled in the area, the most common rock type is quartzite.

The ground profile across the PDF footprint can be described as: aeolian sand overlies most of the PDF basin from surface to depths of 0.8m to over 5.5m. The upper 0.3m to 1m of the aeolian sand had roots and was therefore described as topsoil. The topsoil layer consisted mostly of slightly moist, reddish-brown, very loose, pinhole voided, silty sand with roots of aeolian origin. The aeolian sand underlying the topsoil was described as dry to slightly moist, reddish-brown, loose to dense with depth, pinhole voided, silty sand without roots.

Plant residue deposited into the PDF comprises iron ore fines with a semi-paste consistency.

### Consequence classification

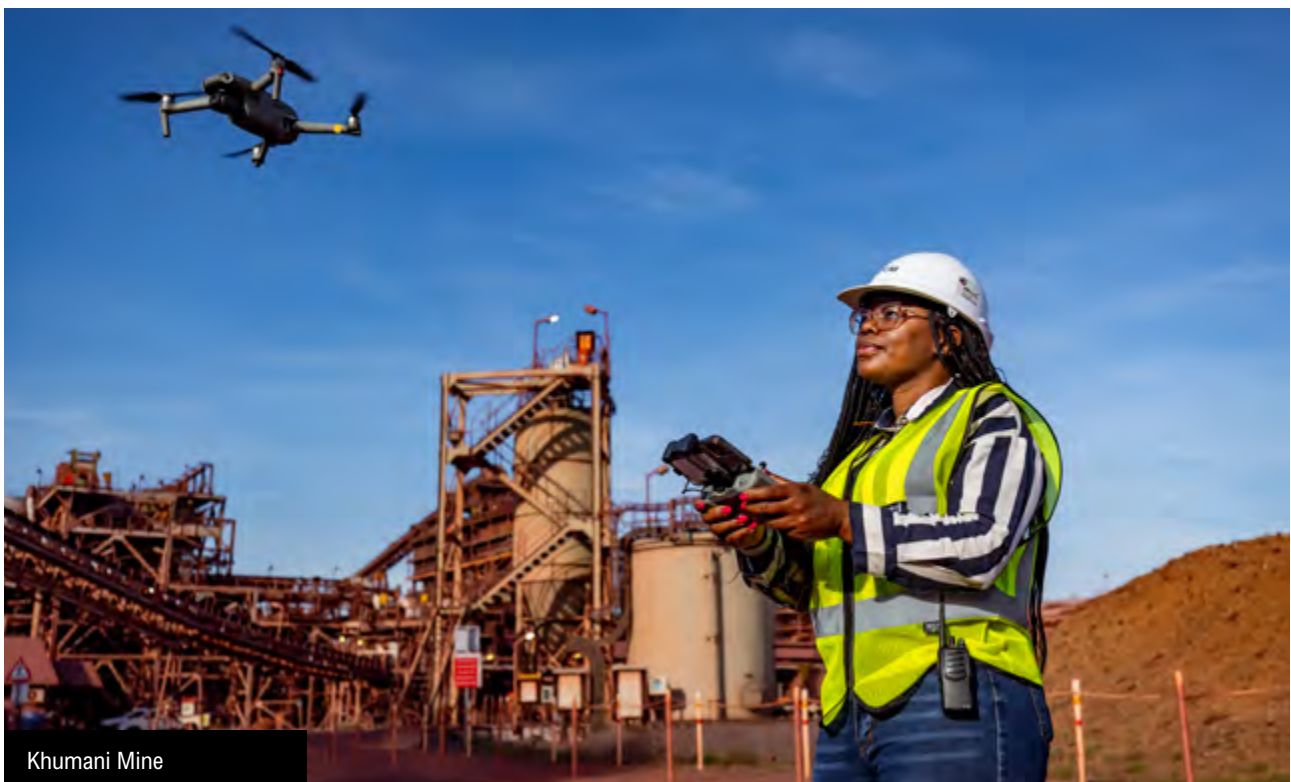
The consequence of failure classification of the mine PDF was done by the appointed engineer of record in January 2020 and updated in 2023 by assessing the downstream conditions documented in the knowledge base 1. As per recommendation by the ITRB in 2023, the dam-breach was reassessed to evaluate the non-liquefaction potential impact on the PDF zone of influence and subsequently the GISTM consequence classification.

The GISTM classification consequence matrix, as defined according to credible catastrophic failure modes, indicated the KHM PDF as having a high classification.

### Summary of risk assessment findings relevant to the TSF

A well-defined risk management system/programme for reviewing tailings safety is in place at the KHM PDF. This proactively identifies, interprets and addresses risks in managing and operating the PDF throughout its life cycle.

A system of managing and monitoring critical parameters ensures the PDF is operated safely and efficiently, in accordance with good environmental practice and in a manner guided by legislation (Mine Health and Safety Act



Khumani Mine

# Khumani Iron Ore Mine continued

## Khumani PDF public disclosure report continued

or MHSA). Critical parameters are monitored, and targets set are defined in the PDF's operations, maintenance and surveillance (OMS) manual, with actual values reported in monthly PDF surveillance and compliance reports.

Substantial work has been done in the last 24 months to understand the stability of the Khumani Mine PDF. A geotechnical investigation, involving both in-situ and laboratory testing, was conducted and an assessment for seismic liquefaction triggering was done. The assessments were undertaken in adherence with the principles and requirements of the GISTM.

The fieldwork component of the investigation included cone penetration testing (CPTu) with pore water pressure measurements, including dissipation tests, and seismic cone penetration testing (SCPTu). The laboratory testing included particle-size distribution tests, foundation indicator tests, slurry consolidometer tests as well as drained and undrained triaxial compression testing. This material and stability assessment was completed in March 2023.

Based on the in-depth stability assessment, the overall stability and liquefaction risk on Khumani's PDF was found to be low, and this study was the basis of the ITRB 2023 recommendation to redo the dam-breach assessment of the KHM PDF, which subsequently reduced the consequence classification from very high to high.

The failure mode identified for the Khumani PDF is failure due to overtopping – pool overtops crest. This is a credible catastrophic failure mode, but this is not associated with the probability of this event occurring and having credible failure modes is not a reflection of facility safety.

Continuous risk assessments, implementation of preventative operational controls and potential failure-modes analysis on the KHM PDF support the principle of ALARP – as low as reasonably practicable – to further reduce potential consequence to people and the environment downstream of the facility.

### **Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios**

The current dam-breach analysis and inundation study for the Khumani Mine PDF is based on credible catastrophic failure mechanisms. The purpose of the dam-breach assessment is to evaluate the potential downstream impact of a hypothetical breach in the Khumani PDF. The breach analysis was conducted for the current crest-wall elevation and expected final crest-wall elevation.

Based on the PDF characteristics, critical potential breach locations were identified, and the most likely failure modes were modelled and simulated for varying hydrological conditions.

Based on population density maps and extents of inundation resulting from models in this dam-breach analysis, the population at risk and the potential loss of life was estimated. The downstream communities were meaningfully engaged to raise awareness about the impact of a failure of the Khumani PDF in the unlikely event that it occurs.

Mitigation measures include the KHM PDF emergency preparedness and response plan (EPRP). This includes plans to deal with environmental spillage containment and clean-up in case of a failure. Further involvement of local communities, including downstream communities and Mine Rescue Services, is done via KHM environmental forums.

### **Description of design for all phases of the tailings facility life cycle, including current and final height**

#### **Current operation (current height)**

The KHM PDF starter embankment for the main embankment was constructed of engineered earthen fill borrowed from the basin of the PDF. A seepage cut-off drain was included in the starter embankment design. The phase 1 lift of the main embankment was constructed using waste rock produced from mining operations, following a downstream construction method. The phase 2 lift (current) methodology occurs independently on compartments 1 and 2, using an upstream construction method.

# Khumani Iron Ore Mine continued

## Khumani PDF public disclosure report continued

The paste facility progresses in thin lifts to ensure optimum consolidation of the deposited paste material. The decant pool on each compartment is controlled by decanting excess water off the basins and the pool is kept away from the outer embankment. The rate of rise is also limited to the design rate of rise.

The Khumani Mine PDF was designed to meet the recommended industry guidelines for factor of safety (FoS). During its operation, the FoS is continually reviewed annually through stability analyses.

Critical controls have been placed on aspects of the Khumani Mine PDF's development, summarised below. These controls are monitored monthly and complemented by daily, weekly, monthly, quarterly and annual reviews for any major changes or deviations from design assumptions. The reviews are conducted by a multidisciplinary team which involves the Khumani PDF operator, EoR, environmental specialists, mine safety personnel, plant engineers, RTFE and ITRB:

### **Tailings deposition strategy, rate of rise and deposition rates**

The operation of the Khumani PDF involves a short and long-term deposition plan that is strictly followed and adjusted to ensure optimal pool control and adequate freeboard. The deposition strategy limits the rate of rise to the approved design.

### **Freeboard and pool control**

The Khumani PDF is designed to comply with government notice 704 freeboard requirements for a 1:50-year storm plus 0.8m. The actual facility freeboard also exceeds the freeboard required to retain a 1:10 000-year storm event (or probable maximum precipitation). Freeboard is verified monthly with accurate surveys of the facility. Strategic deposition plans and pool control ensure that beaching and thus freeboard generation are improved.

### **Wall drainage**

A seepage cut-off drain is installed in the PDF starter embankment to collect seepage from the base. Drain measurements are recorded monthly to assess the performance of the seepage mechanisms.

### **Stormwater management**

Stormwater diversion channels have been constructed on the eastern side, upstream of the paste facility. These channels assist in diverting stormwater away from the PDF footprint and avoid clean water coming into contact with polluted water.

### **Slope angle and benches**

The side-slope angles and bench geometry are monitored and maintained regularly to ensure no deviations from the design intent during operation.

### **Phreatic surface monitoring**

The phreatic surface at the KHM PDF is regularly monitored through both standpipe and vibrating wire piezometers (VWP). This is done through a dashboard that displays live results of VWP readings (daily). Access to the dashboard is provided to the relevant paste facility stakeholders such as the RTFE, PDF operator and EoR.

### **Final height design**

Closure criteria are the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. Closure criteria are closely related to actual emergency management plan (EMP) commitments, being the required actions at closure as agreed with the regulators.

The closure plan of the Khumani PDF, as detailed in the continuation report, will be used as the basis in developing conceptual closure-design options of the facility. Once additional information from specialised studies such as hydrogeology, vegetation assessments, visual impact assessments and other parallel studies are concluded, the detailed closure plan for final height design can be finalised.

### **Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP (as low as reasonably practicable)**

Annual performance reviews are conducted by the EoR. The following additional risk control measures were recommended in the last annual performance review:

- **Development of an updated and formal TSF life-of-mine (LoM) plan and then, based on the LoM plan, develop a comprehensive conceptual closure design and closure plan with associated approvals:**

The Khumani Mine PDF closure plan is being developed in phases (1, 2 and 3), with phase 1 underway. Phase 2 addresses the LoM plan for the paste disposal facility, followed by phase 3 that will provide a detailed closure plan and cost estimates. Planned completion date for all three phases is August 2025, but this date depends on timely feedback from the Department of Water and Sanitation during phase 1 of this study



# Khumani Iron Ore Mine continued

## Khumani PDF public disclosure report continued

- **Complete wall lift of main embankment:**

This action is completed, with both compartments 1 and 2 of the PDF being lifted to the required height, to ensure sufficient freeboard in each of the compartments

- **Improve on deposited dry density measurement:**

This project started in July 2025 and involves field testing and laboratory analysis to accurately establish the in-situ density of the residue within the facility.

### Summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

The following environmental and social additional risk control measures were recommended by the EoR from the annual performance review:

- **Development and implementation of trial sections for slope vegetation:**

The original scope of this study is completed, but the scope is currently being changed to accommodate a less water-dependent approach (in dry seasons, the mine faces water shortages so irrigation is not ideal). Local seeds will be sourced and planted on trial sections of the slope to establish a progressive rehabilitation plan for the raised PDF side slopes.

Khumani Mine keeps a register of all environmental and social complaints received from surrounding communities. The officer: ISO and quality has confirmed that no non-conformance reports have been received for the Khumani Mine PDF in the last 12 months.

### Summary version of tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan (EPRP)

The Khumani Mine PDF emergency preparedness and response plan is based on credible flow-failure scenarios and assessing potential consequences downstream of the facility.

The EPRP serves as a guide in the event of a credible catastrophic failure occurring to ensure a state of readiness in Khumani Mine to manage and execute emergency preparedness and response activities if the PDF should fail.

These activities are specifically aimed to provide immediate response to save lives, supply humanitarian aid and minimise environmental harm. The plan further aims to guide activities to minimise property damage, ensure essential services are repaired or quickly reinstated, and reduce disruption to Khumani Mine operations.

Khumani Mine engages downstream communities to create awareness and educate residents on the potential risks of a failure of the KHM PDF during our environmental forum sessions. These sessions are typically attended by farmers, municipality representatives and emergency services.



Khumani Mine

# Khumani Iron Ore Mine continued

## Khumani PDF public disclosure report continued

### Trigger action response plan (TARP)

Khumani Mine has developed a TARP for the paste disposal facility that gives guidance on the type of response required in the event that an emergency is triggered. The TARP is a tool used for managing crucial situations from the Khumani operations' safety point of view. This document sets out certain conditions or triggers with corresponding actions that mine managers and supervisors must follow when those trigger events occur.

The purpose of the TARP is to assist in decision-making and taking appropriate action where conditions on the PDF progress through a series of changes from normal towards failure.

### Dates of most recent and next independent reviews

The Khumani Mine PDF independent review will be conducted by the ITRB on 19 August 2025.

The ITRB comprised two ITRB members; one specialising in TSF closure, rehabilitation and water management, and the second member an expert in the field of geotechnical engineering and TSFs specifically.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

Khumani conducts annual rehabilitation, remediation, decommissioning and closure activity assessments to determine closure financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements-1.pdf>

Approved by the accountable executive

**André Joubert**

*Chief executive: ARM Ferrous*

4 August 2025



Khumani Mine



## **Black Rock Mining Operations**

ARM's attributable beneficial interest at Black Rock Mining Operations is 50%. The other 50% is held by Assore (Pty) Ltd.

### **Locality**

The mine lies 80km north of the town of Kathu. The mine is situated in John Taolo Gaetsewe district municipality, Gamagara local municipality, Northern Cape, South Africa.



# ARM Ferrous



# Contents

## Gloria old TSF

Black Rock Mine Operations public disclosure on Gloria old TSF

Description of the Black Rock Mine Operations' tailings storage facility

The consequence classification

A summary of risk assessment findings relevant to the tailings storage facility

A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

A description of the design for all phases of the tailings facility life cycle, including the current and final height

A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Dates of most recent and next independent reviews

Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## Black Rock Mine Operations (BRMO) public disclosure on Gloria old TSF

Black Rock Mine Operations began implementing GISTM in August 2020. The first step was to conduct a gap analysis between current tailings facility standards and GISTM. This was followed by a detailed implementation plan to address identified social, environmental and technical gaps.

Black Rock Mine Operations conducted a compliance audit in November 2022. Third-party validation was conducted by Jones & Wagener in June 2025.

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

## GISTM conformance results

Of the 77 GISTM requirements, 29 of the GISTM requirements 'meet' conformance and 32 of the GISTM requirements 'partially meet' conformance. There are seven requirements that 'do not meet' conformance. Nine of the requirements are not applicable to this asset.

The areas that are not in full conformance are related to design, construction, operation and monitoring, and management and governance. These topics are being addressed in accordance with the updated action plan.

## Description of the Black Rock Mine Operations' tailings storage facility

BRMO has traditional tailings storage facilities. Tailings are pumped from the Gloria thickeners at a density of 1.4 to ensure that the material deposited onto the facility has a higher percent of solids and lower water content. The tailings facilities are located 500m from the process plant (refer to figure 1-1).

This old facility is currently dormant.

The TSF has its own return-water dam to store any excess water decanted off the facilities. Water from the RWDs is pumped back to the Gloria plant operations to optimise recovery. Pertinent general information about the operation is detailed in table 1.

# Black Rock Mining Operations continued

## Gloria old TSF public disclosure report continued



*Figure 1-1: Old Gloria tailings facility location and general layout*



*Table 1: TSF general information*

Description	Details
The operation	Black Rock Mine Operations
Operator	Frazer Alexander
Engineer of Record	ARQ Geotech
Business unit	ARM Ferrous division
Magisterial district	John Taolo Gaetsewe district municipality, Gamagara local municipality, Northern Cape, South Africa
List of tailings storage facilities	Gloria old facility
Coordinates	Long: 22.52'16.00"E Lat: 27.8'18.49"S
List of water dams	Gloria old facility – return-water dam south
Current height	Gloria old facility 10m
Current catchment area	Gloria old facility 4ha
Current storage	Gloria old facility 300Mt
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Return-water dam</li> <li>• Standpipes, vibrating wire piezometers</li> <li>• Process and stormwater primary and secondary decanting systems</li> <li>• Return-water pipelines.</li> </ul>
Method of deposition	Dormant

# Black Rock Mining Operations continued

## Gloria old TSF public disclosure report continued

### TSF site description and geology, foundation soils and tailings characteristics

The mine is underlain by quaternary sands, clay and calcrete of the Kalahari formation; Dwyka formation tillite; Mapedi formation quartzite; and the exploited Hotazel formation BIF and manganese deposits. The Wessels-type Mn mineralisation is characterised by N-S cross-cutting faults, which were responsible for the high-grade mineralisation by hydrothermal fluids.

The site is underlain by the Kalahari formation, which consists of a top layer of aeolian sands, followed by calcrete. The maximum depth of the Kalahari formation is  $\pm 125\text{m}$ . The average depth of the water levels below surface in the boreholes found at BRMO is 70m below surface, with a maximum depth of 110m below surface. If this is compared with the water levels found in the Hydro census, it can be concluded that the farmers tap their water from this sand/calcrete aquifer. The calcareous sand also has high characteristics of porosity and permeability and is expected to be a good aquifer.

There is limited surface runoff in the Kalahari area (high infiltration rates during precipitation). The average recharge value is  $\pm 10\%$  of the mean annual precipitation (MAP). Locally, drainage is towards the Kuruman River, which flows westwards, and to the east lies the Ga-Mogara River, which is a tributary to the Kuruman River. Both rivers are ephemeral streams/rivers and flow in these water bodies is periodic. The area is characterised by low rainfall and high potential evapotranspiration.

### The consequence classification

The consequence classification of the TSF was done in 2021 and updated in 2023.

The consequence classification of the TSF is low.

### A summary of risk assessment findings relevant to the tailings storage facility

A well-defined risk management system for reviewing tailings safety is in place at the TSF. This proactively identifies, interprets and addresses risks in managing and operating the TSF throughout its life cycle.

A system of managing and monitoring critical control parameters ensures the facility is operated safely and efficiently, in accordance with good environmental practice. Critical control parameters are monitored and targets set are defined in the operations, maintenance and surveillance (OMS) manual, with actual values reported in monthly surveillance and compliance reports.

The facility has been dormant for the last four years. Electronic measuring equipment was installed to assist as early warning systems. The credible failure mode was assessed for this TSF.

Continuous risk assessments are regularly conducted. Implementation of preventative operational controls is in place to ensure that risks are brought as low as reasonably practicable (ALARP).

### A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The current dam-breach analysis and inundation study for the Gloria old facility is based on credible catastrophic failure mechanisms. The purpose of the dam-breach assessment is to evaluate the potential downstream impact of a hypothetical breach in the Gloria old facility. The breach analysis was conducted for the maximum height crest wall elevation.

Based on the facility's characteristics, critical potential breach locations were identified, and the most likely failure modes were modelled and simulated for varying hydrological conditions.

Based on population density maps and extents of inundation resulting from models in this dam-breach analysis, the population at risk and potential loss of life were identified as mine personal as there are no downstream communities at risk.

Mitigation measures include the BRMO emergency preparedness and response plan (EPRP). This includes plans to deal with environmental spillage containment and clean-up in case of a failure.

### A description of the design for all phases of the tailings facility life cycle, including the current and final height

#### Current operation (current height)

The TSF is dormant, with a final height of 10m. The facility is unlined with no water stored on the facility.

The TSF was operated to ensure optimum consolidation of the deposited material. The decant pool on each compartment is controlled by decanting excess water off the basins and the pool is kept away from the outer embankment. There is no rate of rise on the facility.

The TSF was designed to meet the recommended industry guidelines for factor of safety (FoS). During its operation, the FoS is continually reviewed annually through stability analyses.



# Black Rock Mining Operations continued

## Gloria old TSF public disclosure report continued

Critical controls have been placed on aspects of the TSF development and are summarised below. These controls are monitored regularly through daily, weekly, monthly, quarterly and annual reviews. The reviews are conducted by a multidisciplinary team, which involves the dam operator, EoR, environmental specialists, mine safety personnel, RTFE and ITRB.

### **Tailings deposition strategy, rate of rise and deposition rates**

The operation at the TSF has stopped with no deposition taking place.

### **Freeboard and pool control**

The TSF is designed to comply with government regulation 704 freeboard requirements for a 1:50-year storm plus 0.8m. The actual facility freeboard also exceeds the freeboard required to retain a 1:10 000-year storm event. Freeboard is verified monthly with accurate surveys of the facility.

### **Wall drainage**

The TSF does not have wall drainage but is currently in a dormant stage with no water on the facility.

### **Stormwater management**

Stormwater diversion channels have been constructed on the TSF.

### **Slope angle and benches**

The side-slope angles and bench geometry are monitored and maintained regularly to ensure no deviations from the design intent.

### **Phreatic surface monitoring**

The phreatic surface at the TSF is regularly monitored through both standpipe and vibrating wire piezometers (VWP). This is done through a dashboard that displays live results of VWP readings. Access to the dashboard is provided to the relevant facility stakeholders such as the RTFE, dam operator and EoR.

### **Final height design**

Closure criteria indicate the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, and maintenance and monitoring. Closure criteria are closely related to actual EMP commitments, being the required actions at closure as agreed with the regulators.

The closure plan of the TSF, as detailed in the closure report, will be used as the basis for developing conceptual closure design options of the facility.

Once additional information has been gathered from specialised studies such as hydrogeology, vegetation assessments, visual impact assessments and other relevant studies are concluded, the detailed closure plan for final height design will be finalised.

### **A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP**

The annual performance reviews are conducted by the Engineer of Record. The following additional risk control measures were recommended in the last annual performance review:

- **Installation of a spillway at the TSF**

The design was completed and the construction will commence as per the action plan

- **Installation of a VWP**

The VWPs were installed in December 2024.

### **A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures**

No environmental and social additional risk control measures recommended by the Engineer of Record from the previous annual performance review.

BRMO keeps a register of all environmental and social complaints received from surrounding communities.

No non-conformance reports were received for the TSF in the last 12 months.

### **A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event**

#### **Emergency preparedness and response plan (EPRP)**

BRMO EPRP is based on credible flow-failure scenarios and assessing potential consequences downstream of TSF.

The EPRP serves as a guide in the event of a credible catastrophic failure occurring to ensure a state of readiness at BRMO to manage and execute emergency preparedness and response activities if the new TSF should fail.

These activities are specifically aimed at providing an immediate response to save lives, supply humanitarian aid, and minimise environmental harm. The plan further aims to guide activities to minimise property damage, ensure essential services are repaired or quickly reinstated, and reduce disruption to Black Rock Mine Operations.

BRMO engages downstream communities to create awareness of the potential risks of a failure of the TSF. These sessions are presented to the Kalahari environmental catchment forum.

# Black Rock Mining Operations continued

## Gloria old TSF public disclosure report continued

### Trigger action response plan (TARP)

BRMO has developed a TARP for the tailings facility that gives guidance on the type of response required if an emergency is triggered. The TARP is a tool used for managing crucial situations from the BRMO operations' safety point of view. This document sets out certain conditions or 'triggers' with corresponding actions that mine managers and supervisors must follow when those trigger events occur.

The purpose of the trigger action response plan (TARP) is to assist in the decision-making and taking appropriate action where conditions on the tailings storage facilities progress through a series of changes from normal towards failure mode.

### Dates of most recent and next independent reviews

The independent review of the TSF was conducted by the ITRB on 12 November 2024. The next independent review is scheduled for November 2025 and will comprise one Senior Independent Technical Reviewer.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

BRMO conducts annual rehabilitation, remediation, decommissioning and closure activity assessments to determine closure financial liability as required by legislation. Independent service providers conduct these assessments. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>

Approved by the accountable executive

**André Joubert**

*Chief executive: ARM Ferrous*

4 August 2025



Black Rock Mine

# Contents

## Gloria new TSF

Black Rock Mine Operations public disclosure on Gloria new TSF

Description of the Black Rock Mine Operations' tailings storage facility

The consequence classification

A summary of risk assessment findings relevant to the tailings storage facility

A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

A description of the design for all phases of the tailings facility life cycle, including the current and final height

A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Dates of most recent and next independent reviews

Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## Black Rock Mine Operations (BRMO) public disclosure on Gloria new TSF

Black Rock Mine Operations began implementing GISTM in August 2020. The first step was to conduct a gap analysis between current tailings facility standards and GISTM. This was followed by a detailed implementation plan to address identified social, environmental and technical gaps.

Black Rock Mine Operations conducted a compliance audit in November 2022. Third-party validation was conducted by Jones & Wagener in June 2025.

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

## GISTM conformance results

Of the 77 GISTM requirements, 31 of the GISTM requirements 'meet' conformance and 31 of the GISTM requirements 'partially meet' conformance. There are six requirements that 'do not meet' conformance. Nine of the requirements are not applicable to this asset.

The areas that are not in full conformance are related to design, construction, operation and monitoring, and management and governance. These topics are being addressed in accordance with the updated action plan.

## Description of the Black Rock Mine Operations' tailings storage facility

BRMO has traditional tailings storage facilities. Tailings are pumped from the Gloria thickeners at a density of 1.4 to ensure that the material deposited onto the facility has a higher percent of solids and lower water content. The tailings facilities are located 500m from the process plant (refer to figure 1-1).

The facility has its own return-water dam to store any excess water decanted off the facility. Water from the RWDs is pumped back to the Gloria plant operations to optimise recovery. Pertinent general information about the operation is detailed in table 1.



# Black Rock Mining Operations continued

## Gloria new TSF public disclosure report continued



**Figure 1-1: Black Rock Mine Operations' new Gloria tailings disposal facilities location and general layout**

**Table 1: TSF general information**

Description	Details
The operation	Black Rock Mine Operations
Operator	Frazer Alexander
Engineer of Record	ARQ Geotech
Business unit	ARM Ferrous division
Magisterial district	John Taolo Gaetsewe district municipality, Gamagara local municipality, Northern Cape, South Africa
List of tailings storage facilities	Gloria new facility
Coordinates	Long: 22.52'16.6"E Lat: 27.8'28.76"S
List of water dams	Gloria new facility – return-water dam north
Current height	Gloria new facility – blow starter wall of 4m
Current catchment area	Gloria new facility 9.5ha
Current storage	Gloria new facility 250Mt
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Return-water dam, silt trap</li> <li>• Standpipes, vibrating wire piezometers, underdrains</li> <li>• Deposition pipelines</li> <li>• Process and stormwater primary and secondary decanting systems</li> <li>• Return-water pipelines.</li> </ul>
Method of deposition	Spigot depositing

# Black Rock Mining Operations continued

## Gloria new TSF public disclosure report continued

### **TSF site description and geology, foundation soils and tailings characteristics**

The mine is underlain by quaternary sands, clay and calcrete of the Kalahari formation; Dwyka formation tillite; Mapedi formation quartzite; and the exploited Hotazel formation BIF and manganese deposits. The Wessels-type Mn mineralisation is characterised by N-S cross-cutting faults, which were responsible for the high-grade mineralisation by hydrothermal fluids.

The site is underlain by the Kalahari formation, which consists of a top layer of aeolian sands, followed by calcrete. The maximum depth of the Kalahari formation is  $\pm 125\text{m}$ . The average depth of the water levels below surface in the boreholes found at BRMO is 70m below surface, with a maximum depth of 110m below surface. If this is compared with the water levels found in the Hydro census, it can be concluded that the farmers tap their water from this sand/calcrete aquifer. The calcareous sand also has high characteristics of porosity and permeability and is expected to be a good aquifer.

There is limited surface runoff in the Kalahari area (high infiltration rates during precipitation). The average recharge value is  $\pm 10\%$  of the mean annual precipitation (MAP). Locally, drainage is towards the Kuruman River, which flows westwards, and to the east lies the Ga-Mogara River, which is a tributary to the Kuruman River. Both rivers are ephemeral streams/rivers and flow in these water bodies is periodic. The area is characterised by low rainfall and high potential evapotranspiration.

### **The consequence classification**

The consequence classification of the TSF was done in 2021 and updated in 2023.

The consequence classification of the TSF is low.

### **A summary of risk assessment findings relevant to the tailings storage facility**

A well-defined risk management system for reviewing tailings safety is in place at the Gloria new facility. This proactively identifies, interprets and addresses risks in managing and operating the TSF throughout its life cycle.

A system of managing and monitoring critical control parameters ensures the facility is operated safely and efficiently, in accordance with good environmental practice. Critical control parameters are monitored, and targets set are defined in the operations, maintenance

and surveillance (OMS) manual, with actual values reported in monthly surveillance and compliance reports.

Electronic measuring equipment was installed to assist as early warning systems. The credible failure modes were assessed for this TSF.

Continuous risk assessments are regularly conducted. Implementation of preventative operational controls is in place to ensure that risks are brought as low as reasonably practicable (ALARP).

### **A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios**

The current dam-breach analysis and inundation study for Gloria new facility is based on credible catastrophic failure mechanisms. The purpose of the dam-breach assessment is to evaluate the potential downstream impact of a hypothetical breach in the Gloria new facility. The breach analysis was conducted for current and final height of the TSF.

Based on population density maps and extents of inundation resulting from models in this dam-breach analysis, the population at risk and potential loss of life were identified as mine personal as there are no affected communities in the zone of influence.

Mitigation measures include the BRMO emergency preparedness and response plan (EPRP). This includes plans to deal with environmental spillage containment and clean-up in case of a failure.

### **A description of the design for all phases of the tailings facility life cycle, including the current and final height**

#### **Current operation (current height)**

The new TSF at Gloria starter embankment for the main embankment was constructed of engineered earthen fill borrowed and constructed from waste rock material. A seepage cut-off drain was included in the starter embankment design. The TSF is lined.

The TSF progress in thin lifts to ensure optimum consolidation of the deposited material. The decant pool is controlled by decanting excess water off the basins and the pool is kept away from the outer embankment. The rate of rise is also limited to the design rate of rise.

Gloria new TSF was designed to meet the recommended industry guidelines for factor of safety (FoS). During its operation, the FoS is continually reviewed annually through stability analyses.

# Black Rock Mining Operations continued

## Gloria new TSF public disclosure report continued

Critical controls have been placed on aspects of the TSF development and are summarised below. These controls are monitored regularly through daily, weekly, monthly, quarterly and annual reviews. The reviews are conducted by a multidisciplinary team, which involves the dam operator, EoR, environmental specialists, mine safety personnel, RTFE and ITRB.

### Tailings deposition strategy, rate of rise and deposition rates

The operation of the TSF involves a short and long-term deposition plan that is strictly followed and adjusted to ensure optimal pool control and adequate freeboard. The deposition strategy limits the rate of rise to the approved design.

### Freeboard and pool control

Gloria new facility is designed to comply with government regulation 704 freeboard requirements for a 1:50-year storm plus 0.8m. The actual TSF freeboard also exceeds the freeboard required to retain a 1:10 000-year storm event. Freeboard is verified monthly with accurate surveys of the facility.

### Wall drainage

A seepage cut-off drains are installed in the starter embankment to collect seepage from the base.

### Stormwater management

This TSF is lined and equipped with underdrains.

### Slope angle and benches

There are no side slopes and benches on the TSF as it is still below the starter wall and still in the commissioning phase.

### Phreatic surface monitoring

The phreatic surface at TSF is regularly monitored through both standpipe and vibrating wire piezometers (VWP). This is done through a dashboard that displays live results of VWP readings. Access to the dashboard is provided to the relevant TSF stakeholders such as the RTFE, dam operator and EoR.

### Final height design

Closure criteria indicate the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, and maintenance and monitoring. Closure criteria are closely related to actual EMP commitments, being the required actions at closure as agreed with the regulators.

The closure plan of the TSF, as detailed in the closure report, will be used as the basis for developing conceptual closure design options of the facility. Once additional information has been gathered from specialised studies such as hydrogeology, vegetation assessments, visual impact assessments and other relevant studies are concluded, the detailed closure plan for final height design will be finalised.

### A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

The annual performance reviews are conducted by the Engineer of Record. The following additional risk control measures were recommended in the last annual performance review:

- **Installation of a spillway at the TSF**

The design was completed, and the construction will commence as per the action plan

- **Installation of a VWP**

The VWPs were installed in December 2024.

### A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

No environmental and social additional risk control measures were recommended by the Engineer of Record from the previous annual performance review.

BRMO keeps a register of all environmental and social complaints received from surrounding communities. No non-conformance reports were received for the TSF in the last 12 months.

### A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan (EPRP)

BRMO EPRP is based on credible flow-failure scenarios and assessing potential consequences downstream of TSF.

The EPRP serves as a guide in the event of a credible catastrophic failure occurring to ensure a state of readiness at BRMO to manage and execute emergency preparedness and response activities if the new TSF should fail.



# Black Rock Mining Operations continued

## Gloria new TSF public disclosure report continued

These activities are specifically aimed at providing an immediate response to save lives, supply humanitarian aid, and minimise environmental harm. The plan further aims to guide activities to minimise property damage, ensure essential services are repaired or quickly reinstated, and reduce disruption to Black Rock Mine Operations.

BRMO does not have downstream communities but creates awareness on the potential risks of a failure of the TSF. These sessions are typically presented at the Kalahari environmental catchment forum.

### Trigger action response plan (TARP)

BRMO has developed a TARP for the tailings facility that gives guidance on the type of response required if an emergency is triggered. The TARP is a tool used for managing crucial situations from the BRMO operations' safety point of view. This document sets out certain conditions or 'triggers' with corresponding actions that mine managers and supervisors must follow when those trigger events occur.

The purpose of the TARP is to assist in the decision-making and taking appropriate action where conditions on the tailings storage facilities progress through a series of changes from normal towards failure mode.

### Dates of most recent and next independent reviews

The independent review of the TSF was conducted by the ITRB on 12 November 2024. The next independent review is scheduled for November 2025 and will comprise one Senior Independent Technical Reviewer.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

BRMO conducts annual rehabilitation, remediation, decommissioning and closure activity assessments to determine closure financial liability as required by legislation. Independent service providers conduct these assessments. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>

Approved by the accountable executive

**André Joubert**

*Chief executive: ARM Ferrous*

4 August 2025



Gloria new TSF

# Contents

## Nchwaning 2 old TSF

Black Rock Mine Operations public disclosure on Nchwaning 2 old TSF

Description of the Black Rock Mine Operations' tailings storage facility

The consequence classification

A summary of risk assessment findings relevant to the tailings storage facility

A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

A description of the design for all phases of the tailings facility life cycle, including the current and final height

A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

Dates of most recent and next independent reviews

Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## Black Rock Mine Operations (BRMO) public disclosure on Nchwaning 2 old TSF

Black Rock Mine Operations began implementing GISTM in August 2020. The first step was to conduct a gap analysis between current tailings facility standards and GISTM. This was followed by a detailed implementation plan to address identified social, environmental and technical gaps.

Black Rock Mine Operations conducted a compliance audit in November. Third-party validation was conducted by Jones & Wagener in June 2025.

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

## GISTM conformance results

Of the 77 GISTM requirements, 32 of the GISTM requirements 'meet' conformance and 32 of the GISTM requirements 'partially meet' conformance. There are four requirements that 'do not meet' conformance. Nine of the requirements are not applicable to this asset.

The areas that are not in full conformance are related to design, construction, operation and monitoring, and management and governance. These topics are being addressed in accordance with the updated action plan.

## Description of the Black Rock Mine Operations' tailings storage facility

BRMO has traditional tailings storage facilities. Tailings are pumped from the Nchwaning thickeners at a density of 1.4 to ensure that the material deposited onto the facility has a higher percent of solids and lower water content. The tailings facilities are located 500m from the process plant (refer to figure 1-1).

A total of 2 million tonnes were reclaimed from the TSF to a status of empty. The facility has been put back into operation for the last five months. The deposited material is being reclaimed, and no more than two months' worth of material is kept inside the old facility.

The facility has its own return-water dam to store any excess water decanted off the facility. Water from the RWDs is pumped back to the Nchwaning plant operations to optimise recovery. Pertinent general information about the operation is detailed in table 1.

# Black Rock Mining Operations continued

## Nchwaning 2 old TSF public disclosure report continued



**Figure 1-1: Black Rock Mine Operations' Nchwaning 2 old facility location and general layout**



**Table 1: TSF general information**

Description	Details
The operation	Black Rock Mine Operations
Operator	Frazer Alexander
Engineer of Record	ARQ Geotech
Business unit	ARM Ferrous division
Magisterial district	John Taolo Gaetsewe district municipality, Gamagara local municipality, Northern Cape, South Africa
List of tailings storage facilities	Nchwaning 2 old facility
Coordinates	Long: 22.54'25"E Lat: 27.10'33.89"S
List of water dams	Nchwaning 2 old facility – return-water dam north
Current height	Nchwaning 2 old facility – totally reclaimed wall height 1.8m
Current catchment area	Nchwaning 2 old facility 10.3ha
Current storage	Nchwaning 2 old facility 0t
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Return-water dam</li> <li>• Standpipes, vibrating wire piezometers</li> <li>• Deposition pipelines</li> <li>• Process and stormwater primary and secondary decanting systems</li> <li>• Return-water pipelines.</li> </ul>
Method of deposition	Spigot depositing



# Black Rock Mining Operations continued

## Nchwaning 2 old TSF public disclosure report continued

### TSF site description and geology, foundation soils and tailings characteristics

The mine is underlain by quaternary sands, clay and calcrete of the Kalahari formation; Dwyka formation tillite; Mapedi formation quartzite; and the exploited Hotazel formation BIF and manganese deposits. The Wessels-type Mn mineralisation is characterised by N-S cross-cutting faults, which were responsible for the high-grade mineralisation by hydrothermal fluids.

The site is underlain by the Kalahari formation, which consists of a top layer of aeolian sands, followed by calcrete. The maximum depth of the Kalahari formation is  $\pm 125\text{m}$ . The average depth of the water levels below surface in the boreholes found at BRMO is 70m below surface, with a maximum depth of 110m below surface. If this is compared with the water levels found in the Hydro census, it can be concluded that the farmers tap their water from this sand/calcrete aquifer. The calcareous sand also has high characteristics of porosity and permeability and is expected to be a good aquifer.

There is limited surface runoff in the Kalahari area (high infiltration rates during precipitation). The average recharge value is  $\pm 10\%$  of the mean annual precipitation (MAP). Locally, drainage is towards the Kuruman River, which flows westwards, and to the east lies the Ga-Mogara River, which is a tributary to the Kuruman River. Both rivers are ephemeral streams/rivers and flow in these water bodies is periodic. The area is characterised by low rainfall and high potential evapotranspiration.

### The consequence classification

The consequence classification of the TSF was done in 2021 and updated in 2023.

The consequence classification of the TSF is low.

### A summary of risk assessment findings relevant to the tailings storage facility

A well-defined risk management system/programme for reviewing tailings safety is in place at the TSF. This proactively identifies, interprets and addresses risks in managing and operating the facility throughout its life cycle.

A system of managing and monitoring critical parameters ensures the facility is operated safely and efficiently,

in accordance with good environmental practice and in a manner guided by legislation (Mine Health and Safety Act or MHSA). Critical parameters are monitored and targets set are defined in the operations, maintenance and surveillance (OMS) manual, with actual values reported in monthly surveillance and compliance reports.

Substantial work has been done in the last 36 months to reduce the risk. The aim was to eliminate the risk at the TSF by reclaiming material from the facility to a zero-stock level.

Electronic measuring equipment was installed to assist as early warning systems. The credible failure mode was assessed for this TSF.

Continuous risk assessments are regularly conducted. Implementation of preventative operational controls is in place to ensure that risks are brought as low as reasonably practicable (ALARP).

### A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The current dam-breach analysis and inundation study for the Nchwaning 2 old facility is based on credible catastrophic failure mechanisms. The purpose of the dam-breach assessment is to evaluate the potential downstream impact of a hypothetical breach in the facility. The breach analysis was conducted for current and final height of the TSF.

Based on the facility's characteristics, critical potential breach locations were identified, and the most likely failure modes were modelled and simulated for varying hydrological conditions.

Based on population density maps and extents of inundation resulting from models in this dam-breach analysis, the population at risk and potential loss of life were estimated. The downstream communities were meaningfully engaged to raise awareness about the impact of a failure of the facility in the unlikely event that it occurs.

Mitigation measures include the BRMO emergency preparedness and response plan (EPRP). This includes plans to deal with environmental spillage containment and clean-up in case of a failure.

# Black Rock Mining Operations continued

## Nchwaning 2 old TSF public disclosure report continued

### **A description of the design for all phases of the tailings facility life cycle, including the current and final height**

#### **Current operation (current height)**

The TSF walls are constructed from tailings material deposited over the years. The walls are currently 1.8m high due to the reclamation of the tailings material. Material has been reclaimed as it is deposited, with a zero rate of rise on the facility.

The decant pool is controlled by decanting excess water off the basins and the pool is kept away from the outer embankment.

The TSF was designed to meet the recommended industry guidelines for factor of safety (FoS). During its operation, the FoS is continually reviewed annually through stability analyses.

Critical controls have been placed on aspects of the old facilities development and are summarised below. These controls are monitored monthly and complemented by daily, weekly, monthly, quarterly and annual reviews for any major changes or deviations from design assumptions. The reviews are conducted by a multidisciplinary team, which involves the dam operator, EoR, environmental specialists, mine safety personnel, RTFE and ITRB.

#### **Tailings deposition strategy, rate of rise and deposition rates**

The operation at BRMO involves a short and long-term deposition plan that is strictly followed and adjusted to ensure optimal pool control and adequate freeboard. The deposition strategy is to have zero rate of rise as material was reclaimed as it was being deposited.

#### **Freeboard and pool control**

The TSF is designed to comply with government regulation 704 freeboard requirements for a 1:50-year storm plus 0.8m. The actual TSF freeboard also exceeds the freeboard required to retain a 1:10 000-year storm event. Freeboard is verified monthly with accurate surveys of the facility.

#### **Wall drainage**

The TSF is unlined and does not have wall drainage.

#### **Stormwater management**

Stormwater diversion channels have been constructed on the TSF.

#### **Slope angle and benches**

The side-slope angles and bench geometry are monitored and maintained regularly to ensure no deviations from the design intent during operation.

#### **Phreatic surface monitoring**

The phreatic surface at the TSF is regularly monitored through both standpipe and vibrating wire piezometers (VWP). This is done through a dashboard that displays live results of VWP readings. Access to the dashboard is provided to the relevant facility stakeholders such as the RTFE, dam operator and EoR.

#### **Final height design**

Closure criteria indicate the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. Closure criteria are closely related to actual EMP commitments, being the required actions at closure as agreed with the regulators.

The closure plan of the TSF, as detailed in the closure report, will be used as the basis for developing conceptual closure design options of the facility. Once additional information has been gathered from specialised studies such as hydrogeology, vegetation assessments, visual impact assessments and other relevant studies are concluded, the detailed closure plan for final height design will be finalised.

### **A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP**

The annual performance reviews are conducted by the Engineer of Record. The following additional risk control measures were recommended in the last annual performance review:

- **Installation of a spillway at the TSF**

The design was completed and the construction will commence as per the action plan

- **Installation of a VWP**

The VWPs were installed in December 2024.

### **A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures**

No environmental and social additional risk control measures were recommended by the Engineer of Record from the previous annual performance review.

BRMO keeps a register of all environmental and social complaints received from surrounding communities. No non-conformance reports have been received for the TSF in the last 12 months.

# Black Rock Mining Operations continued

## Nchwaning 2 old TSF public disclosure report continued

### A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan (EPRP)

BRMO EPRP is based on credible flow-failure scenarios and assessing potential consequences downstream of the facility.

The EPRP serves as a guide in the event of a credible catastrophic failure occurring to ensure a state of readiness at BRMO to manage and execute emergency preparedness and response activities if the TSF should fail.

These activities are specifically aimed at providing an immediate response to save lives, supply humanitarian aid, and minimise environmental harm. The plan further aims to guide activities to minimise property damage, ensure essential services are repaired or quickly reinstated, and reduce disruption to Black Rock Mine Operations.

BRMO engages downstream communities to create awareness and educate residents on the potential risks of a failure of the BRMO facilities. These sessions are typically presented to the farmers and factory workers on-site to ensure that the communication is received.

#### Trigger action response plan (TARP)

BRMO has developed a TARP for the tailings facility that gives guidance on the type of response required if an emergency is triggered. The TARP is a tool used for managing crucial situations from the BRMO operations' safety point of view. This document sets out certain

conditions or 'triggers' with corresponding actions that mine managers and supervisors must follow when those trigger events occur.

The purpose of the TARP is to assist in the decision-making and taking appropriate action where conditions on the TSF progress through a series of changes from normal towards failure mode.

#### Dates of most recent and next independent reviews

The BRMO independent review was conducted by the ITRB on 12 November 2024. The next independent review is scheduled for November 2025 and will comprise one Senior Independent Technical Reviewer.

#### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

BRMO conducts annual rehabilitation, remediation, decommissioning and closure activity assessments to determine closure financial liability as required by legislation. Independent service providers conduct these assessments. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>

Approved by the accountable executive

**André Joubert**

Chief executive: ARM Ferrous

4 August 2025



Black Rock Mine



# Contents

## Nchwaning 2 new TSF

Black Rock Mine Operations public disclosure on Nchwaning 2 new TSF
Description of the Black Rock Mine Operations' tailings storage facility
The consequence classification
A summary of risk assessment findings relevant to the tailings storage facility
A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios
A description of the design for all phases of the tailings facility life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
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## Black Rock Mine Operations (BRMO) public disclosure on Nchwaning 2 new TSF

Black Rock Mine Operations began implementing GISTM in August 2020. The first step was to conduct a gap analysis between current tailings facility standards and GISTM. This was followed by a detailed implementation plan to address identified social, environmental and technical gaps.

Black Rock Mine Operations conducted a compliance audit in November 2022. Third-party validation was conducted by Jones & Wagener in June 2025.

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

## GISTM conformance results

Of the 77 GISTM requirements, 31 of the GISTM requirements 'meet' conformance and 31 of the GISTM requirements 'partially meet' conformance. There are six requirements that 'do not meet' conformance. Nine of the requirements are not applicable to this asset.

The areas that are not in full conformance are related to design, construction, operation and monitoring, and management and governance. These topics are being addressed in accordance with the updated action plan.

## Description of the Black Rock Mine Operations tailings storage facility

BRMO has traditional tailings storage facilities. Tailings are pumped from the Nchwaning thickener at a density of 1.4 to ensure that the material deposited onto the facility has a higher percent of solids and lower water content. The tailings facilities are located 500m from the process plant (refer to figure 1-1).

The TSF is in the process of being reclaimed and the reclamation period will be executed over a three-year period.

The TSF has its own return-water dam to store any excess water decanted off the facility. Water from the RWDs is pumped back to the Nchwaning plant operations to optimise recovery. Pertinent general information about the operation is detailed in table 1.

# Black Rock Mining Operations continued

## Nchwaning 2 new TSF public disclosure report continued



**Figure 1-1: Black Rock Mine Operations' tailings disposal facilities location and general layout**



**Table 1: TSF general information**

Description	Details
The operation	Black Rock Mine Operations
Operator	Frazer Alexander
Engineer of Record	ARQ Geotech
Business unit	ARM Ferrous division
Magisterial district	John Taolo Gaetsewe district municipality, Gamagara local municipality, Northern Cape, South Africa
List of tailings storage facilities	Nchwaning 2 new facility
Coordinates	Long: 22.54'12.30"E Lat: 27.10'30.67"S
List of water dams	Nchwaning 2 new facility – return-water dam south
Current height	Nchwaning 2 new facility – below starter wall of 4m
Current catchment area	Nchwaning 2 new facility 14.1ha
Current storage	Nchwaning 2 new facility 0.487Mt
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Return-water dam, silt trap</li> <li>• Standpipes, vibrating wire piezometers, underdrain</li> <li>• Deposition pipelines</li> <li>• Process decanting systems</li> <li>• Return-water pipelines.</li> </ul>
Method of deposition	Spigot depositing

# Black Rock Mining Operations continued

## Nchwaning 2 new TSF public disclosure report continued

### **TSF site description and geology, foundation soils and tailings characteristics**

The mine is underlain by quaternary sands, clay and calcrete of the Kalahari formation; Dwyka formation tillite; Mapedi formation quartzite; and the exploited Hotazel formation BIF and manganese deposits. The Wessels-type Mn mineralisation is characterised by N-S cross-cutting faults, which were responsible for the high-grade mineralisation by hydrothermal fluids.

The site is underlain by the Kalahari formation, which consists of a top layer of aeolian sands, followed by calcrete. The maximum depth of the Kalahari formation is  $\pm 125\text{m}$ . The average depth of the water levels below surface in the boreholes found at BRMO is 70m below surface, with a maximum depth of 110m below surface. If this is compared with the water levels found in the Hydro census, it can be concluded that the farmers tap their water from this sand/calcrete aquifer. The calcareous sand also has high characteristics of porosity and permeability and is expected to be a good aquifer.

There is limited surface runoff in the Kalahari area (high infiltration rates during precipitation). The average recharge value is  $\pm 10\%$  of the mean annual precipitation (MAP). Locally, drainage is towards the Kuruman River, which flows westwards, and to the east lies the Ga-Mogara River, which is a tributary to the Kuruman River. Both rivers are ephemeral streams/rivers and flow in these water bodies is periodic. The area is characterised by low rainfall and high potential evapotranspiration.

### **The consequence classification**

The consequence classification of the TSF was done in 2021 and updated in 2023.

The consequence classification of the TSF is low.

### **A summary of risk assessment findings relevant to the tailings storage facility**

A well-defined risk management system for reviewing tailings safety is in place at the BRMO facilities. This proactively identifies, interprets and addresses risks in managing and operating the facilities throughout its life cycle.

A system of managing and monitoring critical control parameters ensures the facility is operated safely and efficiently, in accordance with good environmental practice. Critical control parameters are monitored and targets set are defined in the operations, maintenance and surveillance (OMS) manual, with actual values reported in monthly surveillance and compliance reports.

Substantial work has been done in the last 24 months to reduce the risk at the TSF. The aim is to eliminate the risk at TSF by reclaiming material from the TSF. Electronic measuring equipment was installed to assist as early warning systems.

Continuous risk assessments are regularly conducted. Implementation of preventative operational controls is in place to ensure that risks are brought as low as reasonably practicable (ALARP).

### **A summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios**

The current dam-breach analysis and inundation study for the TSF is based on credible catastrophic failure mechanisms. The purpose of the dam-breach assessment is to evaluate the potential downstream impact of a hypothetical breach in the TSF. The breach analysis was conducted for current and final height of the TSF.

Based on population density maps and extents of inundation resulting from models in this dam-breach analysis, the population at risk and potential loss of life were identified as mine personal as there are no affected communities in the zone of influence.

Mitigation measures include the BRMO emergency preparedness and response plan (EPRP). This includes plans to deal with environmental spillage containment and clean-up in case of a failure.

### **A description of the design for all phases of the tailings facility life cycle, including the current and final height**

#### **Current operation (current height)**

The TSF starter embankment for the main embankment was constructed of engineered earthen fill borrowed and constructed from waste rock material. A seepage cut-off drain was included in the starter embankment design. The TSF is lined.

The TSF progresses in thin lifts to ensure optimum consolidation of the deposited material. The decant pool is controlled by decanting excess water off the basins and the pool is kept away from the outer embankment. The rate of rise is also limited to the design rate of rise.

The TSF was designed to meet the recommended industry guidelines for factor of safety (FoS). During its operation, the FoS is continually reviewed annually through stability analyses.



# Black Rock Mining Operations continued

## Nchwaning 2 new TSF public disclosure report continued

Critical controls have been placed on aspects of the TSF development and are summarised below. These controls are monitored regularly through daily, weekly, monthly, quarterly and annual reviews. The reviews are conducted by a multidisciplinary team, which involves the dam operator, EoR, environmental specialists, mine safety personnel, RTFE and ITRB.

### Tailings deposition strategy, rate of rise and deposition rates

The operation of TSF involves a short and long-term deposition plan that is strictly followed and adjusted to ensure optimal pool control and adequate freeboard. There was no deposition on the TSF for the last five months.

### Freeboard and pool control

The TSF is designed to comply with government regulation 704 freeboard requirements for a 1:50-year storm plus 0.8m. The actual facility freeboard also exceeds the freeboard required to retain a 1:10 000-year storm event. Freeboard is verified monthly with accurate surveys of the facility.

### Wall drainage

The facility was designed without any seepage drains.

### Stormwater management

The new TSF is lined and equipped with underdrains.

### Slope angle and benches

The new TSF is below the starter wall and does not have any slope angle and benches.

### Phreatic surface monitoring

The phreatic surface at the new TSF is regularly monitored through both standpipe and vibrating wire piezometers (VWP). This is done through a dashboard that displays live results of VWP readings. Access to the dashboard is provided to the relevant facility stakeholders such as the RTFE, dam operator and EoR.

### Final height design

Closure criteria indicate the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, and maintenance and monitoring. Closure criteria are closely related to actual EMP commitments, being the required actions at closure as agreed with the regulators.

The closure plan of the TSF, as detailed in the closure report, will be used as the basis for developing conceptual closure design options of the facility. Once additional information has been gathered from specialised studies such as hydrogeology, vegetation assessments, visual impact assessments and other relevant studies are concluded, the detailed closure plan for final height design will be finalised.

### A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP

The annual performance reviews are conducted by the Engineer of Record. The following additional risk control measures were recommended in the last annual performance review:

- **Installation of a spillway at the TSF**  
The design was completed and the construction will commence as per the action plan
- **Installation of a VWP**  
The VWPs were installed in December 2024
- **Implementation of a reclamation plan for the new Nchwaning 2 facility**  
Completed in March 2025.

### A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

No environmental and social additional risk control measures recommended by the Engineer of Record from the previous annual performance review.

BRMO keeps a register of all environmental and social complaints received from surrounding communities. No non-conformance reports were received for the TSF in the last 12 months.

### A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan (EPRP)

The TSF EPRP is based on credible flow-failure scenarios and assessing potential consequences downstream of the facility.

The EPRP serves as a guide in the event of a credible catastrophic failure occurring to ensure a state of readiness and to manage and execute emergency preparedness and response activities if the TSF should fail.

# Black Rock Mining Operations continued

## Nchwaning 2 new TSF public disclosure report continued

These activities are specifically aimed at providing an immediate response to save lives, supply humanitarian aid, and minimise environmental harm. The plan further aims to guide activities to minimise property damage, ensure essential services are repaired or quickly reinstated, and reduce disruption to Black Rock Mine Operations.

BRMO engages downstream communities to create awareness and educate residents on the potential risks of a failure of the BRMO facilities. These sessions are typically presented to the farmers and factory workers on-site to ensure that the communication is received.

### Trigger action response plan (TARP)

BRMO has developed a TARP for the tailings facility that gives guidance on the type of response required if an emergency is triggered. The TARP is a tool used for managing crucial situations from the BRMO operations' safety point of view. This document sets out certain conditions or 'triggers' with corresponding actions that mine managers and supervisors must follow when those trigger events occur.

The purpose of the TARP is to assist in the decision-making and taking appropriate action where conditions on the tailings storage facilities progress through a series of changes from normal towards failure mode.

### Dates of most recent and next independent reviews

The independent review of the TSF was conducted by the ITRB on 12 November 2024. The next independent review is scheduled for November 2025 and will comprise one Senior Independent Technical Reviewer.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

BRMO conducts annual rehabilitation, remediation, decommissioning and closure activity assessments to determine closure financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements.pdf>

Approved by the accountable executive

**André Joubert**

*Chief executive: ARM Ferrous*

4 August 2025



Nchwaning new TSF



## **Beeshoek Iron Ore Mine**

ARM's attributable beneficial interest at Beeshoek Iron Ore Mine is 50%. The other 50% is held by Assore (Pty) Ltd.

### **Locality**

The main activity at Beeshoek Iron Ore Mine is the mining of iron ore using open-pit mining methods. The mine is located approximately 200km west of Kimberley, in the Northern Cape with the open-pit operations being 7km west of Postmasburg.



# ARM Ferrous



# Contents

## Beeshoek TSF

Beeshoek Mine public disclosure on the Beeshoek PDF
Description of the Beeshoek Mine TSF
The consequence classification
A summary of risk assessment findings relevant to the TSF
A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow-failure scenarios
A description of the design for all phases of the tailings facility life cycle, including the current and final height
A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP
A summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures
A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event
Dates of most recent and next independent reviews
Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

## Beeshoek Mine public disclosure on the Beeshoek TSF

Beeshoek Mine began implementing GISTM in October 2021. The first step was to conduct a gap analysis between current tailings facility standards and GISTM (gap analysis undertaken October 2021). This was followed by a detailed implementation plan to address identified social, environmental and technical gaps.

A self-assessment has been started to determine requirement status and the third-party validation was done by Jones & Wagener in June 2025.

To assess implementation of the GISTM requirements, we have used the ICMM conformance protocols for GISTM. This maps the GISTM's 77 requirements using 219 clear and concise assessment criteria. The GISTM conformance results are reported against the 77 GISTM requirements.

## GISTM conformance results

Of the 77 GISTM requirements, 37 'meet' conformance and 24 requirements 'partially meet' conformance. There are five requirements that 'do not meet' conformance. Of the requirements 11 are not applicable to this asset. The areas that 'do not meet' conformance are related to 'topic 3 – design, construction, operation and monitoring of the tailings facility' and 'topic 4 – management and governance'. These topics are being addressed in accordance with the updated action plan.

## Description of the Beeshoek Mine TSF

The Beeshoek TSF began operation in 2003 and serves as the primary TSF for the Beeshoek Iron Ore Mine. The TSF (refer to figure 1-1), resembling a conventional downstream TSF, was initially constructed to accommodate the mine's tailings requirements for 12.6 years, but subsequent operational changes have extended its life-of-facility (LoF) to approximately 28 years, covering the period from 2003 to 2031.

The facility's design and operational parameters have evolved over time, with contributions from various consulting firms, including Geo Tail (concept design phase, 2009) and SRK Consulting (current engineer of record). Notable developments include the construction of a division wall in 2017 to manage supernatant water. The embankment walls surrounding the facility range in height and width, with the northern embankment being the widest, measuring on average 142m from the upstream to downstream toe in some portions. Pertinent general information about the operation is detailed in table 1.

## Site description and geology, foundation soils and tailings characteristics

The TSF is essentially a cross-valley impoundment enclosed with rockfill embankments on the northern side and rockfill dumps on the southern and eastern sides.

# Beeshoek Iron Ore Mine continued

## Beeshoek TSF public disclosure report continued



**Figure 1-1: Beeshoek Mine super fines storage facility location and general layout**

The natural drainage is to the south-south-west at an approximate gradient of 1:140. The TSF impoundment itself drains towards the north-east and is in fact draining in an opposite direction to the natural topography of the area.

According to the 1:250 000 scale geological map series 2822 Postmasburg, the site is underlain by dolomite, dolomitic limestone, and chert of the Ghaap Plateau dolomite formation within the Campbell Group as well as banded ironstone with amphibolite and crocidolite of the Asbesheuwels Ironstone formation of the Griquatown Group. The Ghaap Plateau dolomite formations occur at depth within and to the northeast of the Beeshoek Mine property. These formations form a regional anticline known as the Maremane Anticline. The regional geology of the site is structurally complex. The Campbell Group predates the iron-rich Griquatown Group. Several iron ore mines are located in the area, with the Beeshoek mine producing 3 million tonnes per annum of iron ore.

The iron ore deposits are described as being contained within a sequence of early proterozoic sediments of the Transvaal sequence deposited 2 200–2 500 million years ago.

### Consequence classification

The consequence of failure classification of the TSF was done by the appointed engineer of record in October 2023. The assessment and selection of the classification was based on the dam-breach assessment

for the credible catastrophic failure modes. The GISTM classification consequence matrix indicated the TSF as having a significant classification.

### Summary of risk assessment findings relevant to the TSF

A well-defined risk management system/programme for reviewing tailings safety is in place at the TSF. This proactively identifies, interprets and addresses risks in managing and operating the TSF throughout its life cycle.

A system of managing and monitoring critical parameters ensures the TSF is operated safely and efficiently, in accordance with good environmental practice and in a manner guided by legislation (Mine Health and Safety Act or MHSA). Critical parameters are monitored, and targets set are defined in the TSF's operations, maintenance and surveillance (OMS) manual, with actual values reported in monthly TSF monitoring reports.

Substantial work has been done to understand the stability of the TSF. A geotechnical investigation, involving both in-situ and laboratory testing, was conducted. Ongoing testing of the tailings material is undertaken annually. The assessments adhered to the principles and requirements of GISTM.

Based on stability assessments, the overall stability risk on the TSF was found to be low. Furthermore, definitive testwork on the TSF tailings has not yet been done to the point where an opinion can be offered as to whether the TSF tailings is brittle or not. However, assessments

# Beeshoek Iron Ore Mine continued

## Beeshoek TSF public disclosure report continued

**Table 1: TSF general information**

Description	Details
The operation	Beeshoek Iron Ore Mine
TSF operator	Owner-operated
Engineer of record	SRK Consulting (South Africa) (Pty) Ltd
Business unit	ARM ferrous division
Magisterial district	ZF Mgcawu district municipality, Tsantsabane local municipality, Northern Cape, South Africa
List of tailings storage facilities	Beeshoek Mine super fines storage facility
TSF coordinates	Long: 23° 0'51.11"E Lat: 28°16'40.92"S
List of water dams	Stormwater dam
Current height	Beeshoek TSF: 23m (1 349mamsl)
Current footprint area	Beeshoek TSF: >70ha
Current storage	Beeshoek TSF: 17.17 million tonnes (end-2024)
Other associated key infrastructures	<ul style="list-style-type: none"> <li>• Standpipe piezometers</li> <li>• Deposition pipelines</li> <li>• Process and stormwater primary decanting systems</li> <li>• Return-water pipelines.</li> </ul>
Method of deposition	Deposition is currently restricted to spigoting from the southern and western walls

assuming a conservative stance to the potential for brittle failure ruled out brittle failure as a credible failure mode, as the factors of safety were in the order of magnitude of 4 (FoS > 4).

The failure modes analysed for the dam-breach study for the Beeshoek TSF focused on a seepage and liquefaction failure for both a sunny-day and rainy-day hydrological condition. The seepage failure mode is considered to be the more credible failure mode, and liquefaction failure was considered to define a worst-case scenario. This is a credible catastrophic failure mode, but is not associated with the probability of this event occurring and having credible failure modes is not a reflection of facility safety.

Continuous risk assessments, implementation of preventative operational controls and potential failure-modes analysis on the TSF support the principle of ALARP – as low as reasonably practicable – to further reduce potential consequence to people and the environment downstream of the facility.

### Summary of impact assessments and human exposure and vulnerability to tailings facility credible flow-failure scenarios

The current dam-breach analysis and inundation study for the TSF is based on credible catastrophic failure mechanisms. The purpose of the dam-breach assessment is to evaluate the potential downstream impact of a

hypothetical breach in the TSF. This study included an assessment of hypothetical breach scenarios at the current and final design elevations for Beeshoek TSF.

A breach from the northern embankment/flank of the TSF indicates that the greatest inundation extent for both the sunny and rainy-day scenario does not extend more than 1.3km downstream of the breach. There appears to be no inundated areas indicating persons or property at risk within the breach based off current Google imagery. The results from the hypothetical breach location indicate that no roads, people and/or infrastructure situated near the TSF could potentially be impacted from a breach of the TSF.

### Description of design for all phases of the tailings facility life cycle, including current and final height

#### Current operation (current height)

The TSF was designed to meet the recommended industry guidelines for factor of safety (FoS). During its operation, the FoS is continually reviewed through stability analyses.

Critical controls have been placed on aspects of the TSF's development, summarised below. These controls are monitored monthly and complemented by daily, weekly, monthly, quarterly and annual reviews for any major changes or deviations from design assumptions. The reviews are conducted by a multidisciplinary team which



# Beeshoek Iron Ore Mine continued

## Beeshoek TSF public disclosure report continued

involves the EoR, environmental specialists, mine safety personnel, plant engineers, RTFE and ITRB:

### Tailings deposition strategy, rate of rise and deposition rates

The operation of the TSF involves a short and long-term deposition plan that is strictly followed and adjusted to ensure optimal pool control and adequate freeboard. The deposition strategy limits the rate of rise to the approved design.

### Freeboard and pool control

The TSF is designed to comply with government notice 704 freeboard requirements for a 1:50-year storm plus 0.8m. The actual facility freeboard also exceeds the freeboard required to retain a 1:10 000-year storm event (or probable maximum precipitation). Freeboard is verified monthly with accurate surveys of the facility.

The TSF pool is primarily situated towards the north of the facility. The current deposition strategy has created a downward slope from south to north, directing runoff towards the northern part of the facility. Consequently, pool water seeps through the division wall into the stormwater dam, from where it is pumped back to the processing plant.

### Slope angle and benches

The side-slope angles and bench geometry are monitored and maintained regularly to ensure no deviations from the design intent during operation.

### Phreatic surface monitoring

The phreatic surface at the TSF is monitored on a monthly basis through standpipe and piezometers.

### Final height design

Closure criteria are the actions required to mitigate identified closure risks. This involves removing infrastructure, erecting fencing, installing drainage structures, reshaping, topsoiling, ripping, seeding and planting, maintenance and monitoring. Closure criteria are closely related to actual EMP commitments, being the required actions at closure as agreed with the regulators.

The conceptual closure plan of the TSF, as detailed in the continuation report, will be used as the basis in developing prefeasibility closure-design options of the facility. The prefeasibility closure study for the TSF is currently in progress.

### Summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP (as low as reasonably practicable)

Annual performance reviews are conducted by the EoR. The following additional risk control measures were recommended in the last annual performance review:

- Installation of standpipe piezometers at the main embankment, as well as at the toe of the TSF, is required (completed January 2025)
- Installation of a dust bucket at the TSF is required for an accurate representation of dustfall
- Remove uncertainty pertaining to:
  - Consistency of the rockfill material through a visual and intrusive investigation (logs from 2024 drilling campaign to be analysed)
- The recommendations from the independent tailings review should be addressed and any matters relating to monitoring should be workshoped with the client and actioned:
  - Installation of instrumentation as recommended by the EoR (completed January 2025)
  - Continuous testing to confirm the in-situ density of the TSF
  - Carrying out an operational and management system audit (in progress).

### Summary of material findings of the environmental and social monitoring programme, including implementation of mitigation measures

The following environmental and social additional risk control measures were recommended by the EoR from the annual performance review:

- Vegetation on the TSF potentially contributing to significant water loss
  - Implement a plan to remove the vegetation using environmentally appropriate techniques.

### Summary version of tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow-failure event

#### Emergency preparedness and response plan (EPRP)

The Beeshoek Mine TSF emergency preparedness and response plan is based on credible flow-failure scenarios and assessing potential consequences downstream of the facility.

# Beeshoek Iron Ore Mine continued

## Beeshoek TSF public disclosure report continued

The EPRP serves as a guide in the event of a credible catastrophic failure occurring to ensure a state of readiness in Beeshoek Mine to manage and execute emergency preparedness and response activities if the TSF should fail.

These activities are specifically aimed to provide immediate response to save lives, supply humanitarian aid and minimise environmental harm. The plan further aims to guide activities to minimise property damage, ensure essential services are repaired or quickly reinstated, and reduce disruption to Beeshoek Mine operations.

### Trigger action response plan (TARP)

Beeshoek Mine has developed a TARP for the TSF that gives guidance on the type of response required in the event that an emergency is triggered. The TARP is a tool used for managing crucial situations from the Beeshoek operations' safety point of view. This document sets out certain conditions or triggers with corresponding actions that mine managers and supervisors must follow when those trigger events occur.

The purpose of the TARP is to assist in decision-making and taking appropriate action where conditions on the TSF progress through a series of changes from normal towards failure.

### Dates of most recent and next independent reviews

The Beeshoek Mine TSF independent review was conducted by the independent technical reviewer in November 2024. The next independent review is scheduled for November 2025 and will be with the same senior independent technical reviewer.

### Annual confirmation that the operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs

Beeshoek conducts annual rehabilitation, remediation, decommissioning and closure activity assessments to determine closure financial liability as required by legislation. These assessments are conducted by independent service providers. A combination of financial vehicles is used to provide for the assessed financial liability.



Please refer to audited financial statements on the indicated link: <https://arm.co.za/wp-content/uploads/2024/10/2024-Annual-Financial-Statements-1.pdf>

Approved by the accountable executive

**André Joubert**

*Chief executive: ARM Ferrous*

4 August 2025



Beeshoek Mine

# Glossary of terms

ALARP	As low as reasonably practicable
ARM	African Rainbow Minerals
BCMP	Business continuity management plan
BH	Beeshoek Mine
BIF	Banded iron and silica formation
BPM	Bokoni Platinum Mine
BRMO	Black Rock Mine operation
CC	Consequence classification
CCS	Consequence classification of structures
Co	Cobalt
CPTu	Piezocone (cone penetrometer/ penetration) test with pore pressure readings
Cr	Chromium
Cu	Copper
CWP	Chrome wash plant
DSR	Dam-safety review
EMP	Environmental management plan
EoR	Engineer of record
EPRP	Emergency preparedness and response plan
ESMS	Environmental social management system
FoS	Factors of safety
GISTM	Global Industry Standard on Tailings Management
ITRB	Independent Tailings Review Board
ICMM	International Council on Mining and Metals

JV	Joint venture
KHM	Khumani Mine
LoF	Life-of-facility
LoM	Life-of-mine
Mamsl	Metres above mean sea level
MHSA	Mine Health and Safety Act
MMZ	Main Mineralised Zone
MNOL	Minimum operating level
MPM	Modikwa Platinum Mine
NNM	Nkomati Nickel Mine
OMS	Operations, maintenance and surveillance
PCMZ	Chromatic Peridotite Mineralised Zone
PDF	Paste disposal facility
PFM	Potential failure mode
PFMA	Potential failure mode analysis
RoR	Rate of rise
RSCPTu	Resistivity and seismic cone penetration test
RTFE	Responsible tailings facility engineer
RWD	Return-water dam
SCPTu	Seismic cone penetration test
TARP	Trigger action response plan
TDBA	Tailings dam-breach analysis
TMS	Tailings management systems
TRP	Two Rivers Platinum Mine
TSF	Tailings storage facility
VWP	Vibrating wire piezometer



# Contact and administration

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TG Ramathuga\*  
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## We appreciate your feedback

In the interests of continuous improvement and fulfilling the information and engagement needs of our stakeholders, we welcome any feedback on the content and format of our reports. Please direct these to the investor relations department. Email: [iradmin@arm.co.za](mailto:iradmin@arm.co.za).

## Forward-looking statements

Certain statements in this document constitute forward-looking statements that are financial results nor historical information. They include but are not limited to statements that are predictions of or indicate future earnings, savings, synergies, events, trends, plans or objectives. Such forward-looking statements may or may not take into account and may or may not be affected by known and/or unknown risks, unpredictables and other important factors that could cause the actual results, performance and/or achievements of the company to be materially different from the future results, performance or achievements expressed or implied by such forward-looking statements. Such risks, unpredictables and other important factors include among others: economic, business and political conditions in South Africa; decreases in the market price of commodities; hazards associated with underground and surface mining; labour disruptions; changes in government regulations, including environmental regulations; changes in exchange rates; currency devaluations; inflation and other macro-economic factors; and the impact of the health-related epidemics and pandemics in South Africa.

These forward-looking statements speak only as of the date of publication of these pages. The company undertakes no obligation to update publicly or release any revisions to these forward-looking statements to reflect events or circumstances after the date of publication of these pages or to reflect the occurrence of unpredictable events.





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