



Prime Resources (Pty) Ltd
The Workshop 70-7th Avenue Parktown North 2193
Postnet Suite #002 Private Bag XI Woodhill 0076
T +27 11 447 4888 E prime@resources.co.za
www.resources.co.za



R
prime | resources
environmental
consultants

GOLD ONE AFRICA LTD: VENTERSBURG PROJECT

EXTERNAL ENVIRONMENTAL AUDIT REPORT OF THE VENTERSBURG GOLD MINE, FREE STATE PROVINCE

FOR THE PERIOD: JANUARY 2022 – MARCH 2024

DMR REF. FS 30/5/1/2/2/10036 MR

APRIL 2024

Prepared for:

G₁OLD ONE
AFRICA LIMITED

Postnet Suite 415
Private Bag x75
Bryanston
2021

TABLE OF CONTENTS

1	GENERAL INFORMATION	1
1.1	Licence holder.....	1
1.2	Independent external auditor.....	1
1.3	Scope	1
1.4	Site visit.....	2
1.5	Consultation and comments.....	2
1.6	Declaration of independence	2
1.7	Assumptions, uncertainties, and gaps in knowledge	2
1.8	Disclaimer	2
2	INTRODUCTION	4
2.1	Background and location	4
2.2	Project description	4
2.3	Prospecting.....	5
3	LEGAL FRAMEWORK.....	9
3.1	MPRDA (2002) and MPRDA Regulations (2004), as amended	9
3.2	NEMA (1998), as amended and EIA Regulations (2014), as amended	9
4	OBJECTIVES AND CONTENTS OF ENVIRONMENTAL AUDIT REPORT	12
4.1	Objectives	12
4.2	Content.....	12
4.3	Frequency of reporting	12
4.4	Period applicable to this assessment	12
5	ASSESSMENT OF COMPLIANCE.....	13
5.1	Rationale for scoring system	13
5.2	Audit ratings.....	13
5.3	Audit findings.....	14
5.4	Site photographs.....	17
6	CONCLUSIONS AND RECOMMENDATIONS.....	19
6.1	Compliance scores.....	19
6.1.1	Compliance with the EA	19
6.1.2	Compliance with the EMPr.....	19
6.2	Adequacy of the Ventersburg EMPr	19
6.3	EMPr recommendation report.....	20
6.4	Financial Provision and Rehabilitation.....	20
6.5	Recommended actions	20
6.5.1	Prior to construction	20
6.6	Conclusions	21

FIGURES

Figure 1. Ventersburg Gold Mine project area and Mining Right Area	4
Figure 2. Ventersburg mining area and surface infrastructure (as per 2017 submission)	5
Figure 3. Surface infrastructure showing regulated area of wetlands (500m) (as per 2017 WULA submission and aligning with EMPr)	7
Figure 4. Revised surface infrastructure layout showing regulated area of wetlands (500m) (as per final 2019 WULA submission)	8
Figure 5. Baling and hay storage area	17
Figure 6. Field for livestock grazing and homestead in the background amongst the trees	17
Figure 7. Wetland area	17
Figure 8. Field for livestock grazing with a water trough	17
Figure 9. Homestead (Mr Vogel) in the background	18
Figure 10. Field for livestock grazing	18
Figure 11. Agricultural activities	18
Figure 12. Agricultural activities	18

TABLES

Table 1. Details and expertise of audit team	1
Table 2. Contents of an Environmental Audit Report in terms of Appendix 7 of the EIA Regulations (2014)	10
Table 3. Compliance scores used for the environmental audit.....	13
Table 4. Overall compliance in terms of the EA and EMPr.....	14
Table 5. Update on previous partial and non-compliances in the EA compliance audit.....	15
Table 6. Current compliance with the EA (partial and non-compliance only)	15
Table 7. Current compliance with the EMPr (partial and non-compliance only) and update on previous partial and non-compliances in the EMPr compliance audit	16
Table 8. Site photographs (14 March 2024)	17
Table 9. Financial provision calculations for closure for Ventersburg Gold Mine	20

APPENDICES

Appendix 1	Complete EA compliance checklist for 2024
Appendix 2	Complete EMPr compliance checklist for 2024

ACRONYMS

CA	Competent Authority
DMR / DMRE	Department of Mineral Resources / Department of Mineral Resources and Energy
DWS	Department of Water Affairs / Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAR	Environmental Audit Report
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMPr	Environmental Management Programme
EPRP	Emergency Preparedness and Response Plan
IEA	Integrated Environmental Authorisation
IAP	Interested and Affected Party
LoM	Life of Mine
MPRDA	Minerals and Petroleum Resource Development Act (No. 28 of 2002)
NEMA	National Environmental Management Act (No. 107 of 1998)
NHRA	National Heritage Resources Act (No. 25 of 1999)
NNR	National Nuclear Regulator
NNRA	National Nuclear Regulator Act (No. 47 of 1999)
NWA	National Water Act
PCD	Pollution Control Dam
PHRAG	Provincial Heritage Resources Authority of Gauteng
ROM	Run of Mine
SAHRA	South African Heritage Resources Act
TSF	Tailings storage facility
WRD	Waste rock dump
WULA	Water Use Licence Application
WUL	Water Use Licence

1 GENERAL INFORMATION

1.1 Licence holder

Company	Gold One Africa Limited
Site contacts	Jon Hericourt
Physical address	2nd Floor, Unit B001, Block B, Knightsbridge Office Development, 33 Sloane Street, Bryanston, Johannesburg
Postal address	PostNet Suite 415, Private Bag X75, Bryanston
Email address	Jon.Hericourt@gold1.co.za

1.2 Independent external auditor

Company	Prime Resources (Pty) Ltd
Physical address	70 - 7 th Avenue, Parktown North, Johannesburg
Postal address	Postnet suite # 002, Private bag x1, Woodhill, 0076
Telephone number	011 447 4888
Fax number	086 604 2219
Email	prime@resources.co.za
Professional affiliations	ECSA SACNASP SAIMM EAPASA IAIAAsa
Date of site visit	14 March 2024
Draft report issued	14 May 2024
Audit finalisation date	29 May 2025

Prime Resources is a specialist environmental consulting firm providing environmental and related services and was established in 2003. Prime Resources was founded by Peter Theron (PrEng, SAIMM), who has over 30 years' experience in the field of environmental science and engineering.

Relevant details of the audit team are provided in Table 1.

Table 1. Details and expertise of audit team

Auditor	Lindsay Lightfoot	Gené Main
Role	Principal Consultant, author	Principal Consultant, review
Qualifications	BA Hons (Environmental Science) MA (Environmental Science)	BSc Hons (Environmental Science) MSc (Botany)
Affiliations	IAIAAsa Membership No. 814691	Pr.Sci.Nat. (Env. Sci.) No. 400370 EAPASA Registered, No. 1257 IAIAAsa Membership No. 5932
Experience	13 years	16 years

1.3 Scope

This Environmental Audit Report (EAR) is focussed on compliance with measures and conditions of the:

- Environmental Impact Assessment Report and **Environmental Management Programme Report** for the Ventersburg Gold Mine. September 2017. DMRE reference FS 30/5/1/2/2/1036 MR.
- **Integrated Environmental Authorisation** issued to Gold One Africa Ltd on 9 January 2018 in terms of the NEMA as amended, the EIA Regulations, 2014, and the National Environmental Management: Waste Act Regulations, 2013.

- A Rehabilitation and Closure Plan was compiled in 2017 and approved as part of the EMPr. Construction has yet to commence and therefore compliance with the Rehabilitation and Closure Plan is not currently applicable.

1.4 Site visit

A physical site inspection was undertaken on 14 March 2024 by Louise Jones and Stephan Geyer from Prime Resources. Photographs from the site visit can be found in Table 8.

1.5 Consultation and comments

No consultation with Interested and Affected Parties (IAPs) was undertaken during the process of compiling this audit report. No comments were therefore received from IAPs for inclusion in the report. The CA has not requested any specific information to be included in the report.

1.6 Declaration of independence

As the appointed external auditor, Prime Resources (Pty) Ltd has no other beneficial interest in the Ventersburg Project as pertains to the undertaking of this assignment other than fair remuneration in accordance with normal professional environmental consulting practice. The conclusions and opinions expressed in this report are entirely those of Prime Resources and are based wholly upon the information described throughout this report.

It is hereby declared that the environmental consultants, scientists, and engineers under the employ of Prime Resources, insofar as the undertaking of this assignment:

- Act as an independent auditor and that neither myself nor Prime Resources (Pty) Ltd has any business, financial, personal, or other interest in this project other than fair remuneration for undertaking services related to the environmental audit.
- Undertake the services related to the audit in an objective manner, even if this results in findings and recommendations that are not favourable to our client.
- There are no circumstances that will compromise the objectivity and independence in undertaking this work.
- Have the necessary expertise and experience to conduct this environmental audit, including knowledge of the relevant legislation.
- Have not, and will not, engage in conflicting interests in the undertaking of the audit.
- All information furnished for the audit is true and correct at the time of compiling the report.

Compiled by Lindsay Lightfoot, Principal Consultant, Prime Resources

Reviewed by Gené Main, Principal Consultant, Prime Resources

1.7 Assumptions, uncertainties, and gaps in knowledge

The findings recorded in this report are limited to the timeframe during which the audit was undertaken.

No monitoring of environmental conditions was undertaken for this audit.

1.8 Disclaimer

Prime Resources has expressed due and diligent care to comprehensively evaluate the compliance of activities and operations undertaken at the project by the Holder with the stated licence-/s, standard-/s or authorisation-/s against which the audit was conducted, for the period under review. It is noted, however,

that the audit relies on findings made during a single site inspection, substantiated with information supplied by the Holder for the period under review. It is assumed that all data provided by Gold One Africa Ltd is true and correct. The possibility is acknowledged that areas of partial and-/or non-conformance were either not observed during the site inspection or did not come to light from a review of the data provided. The onus lies with those responsible to use the precautionary principle to address potential deviations or non-compliances that were not identified in this report and to implement all legislated and permitted license conditions.

The scope of this audit does not include a comprehensive legal, Occupational Health and Safety, or Mine Health and Safety compliance audit.

Audited by

Lindsay Lightfoot



9 May 2024

Reviewed by

Gené Main



9 May 2024

2 INTRODUCTION

2.1 Background and location

The Gold One Africa (Ltd) Ventersburg Gold Mine is a proposed underground mining operation including an on-site processing plant and supporting infrastructure. The Project is situated between the towns of Ventersburg and Hennenman, on portions of the farms Klippan 77, La Rochelle 760, Uitsig 723, Vogelsrand 720, and Whites 747 in the Free State Province (Figure 1 and Figure 2).

Gold One Africa has been granted a Mining Right for gold, uranium and associated precious metals in terms of the Mineral and Petroleum Resources Development Act, No. 28 of 2002 (MPRDA) (Mining Right reference: FS 10036 MR), and has received an Integrated Environmental Authorisation (IEA) for activities listed in terms of the National Environmental Management Act, No. 107 of 1998 (NEMA) Environmental Impact Assessment (EIA) Regulations (GNR982 of 2014) (IEA Ref. FS 30/5/1/2/3/2/1 (10036) EM).

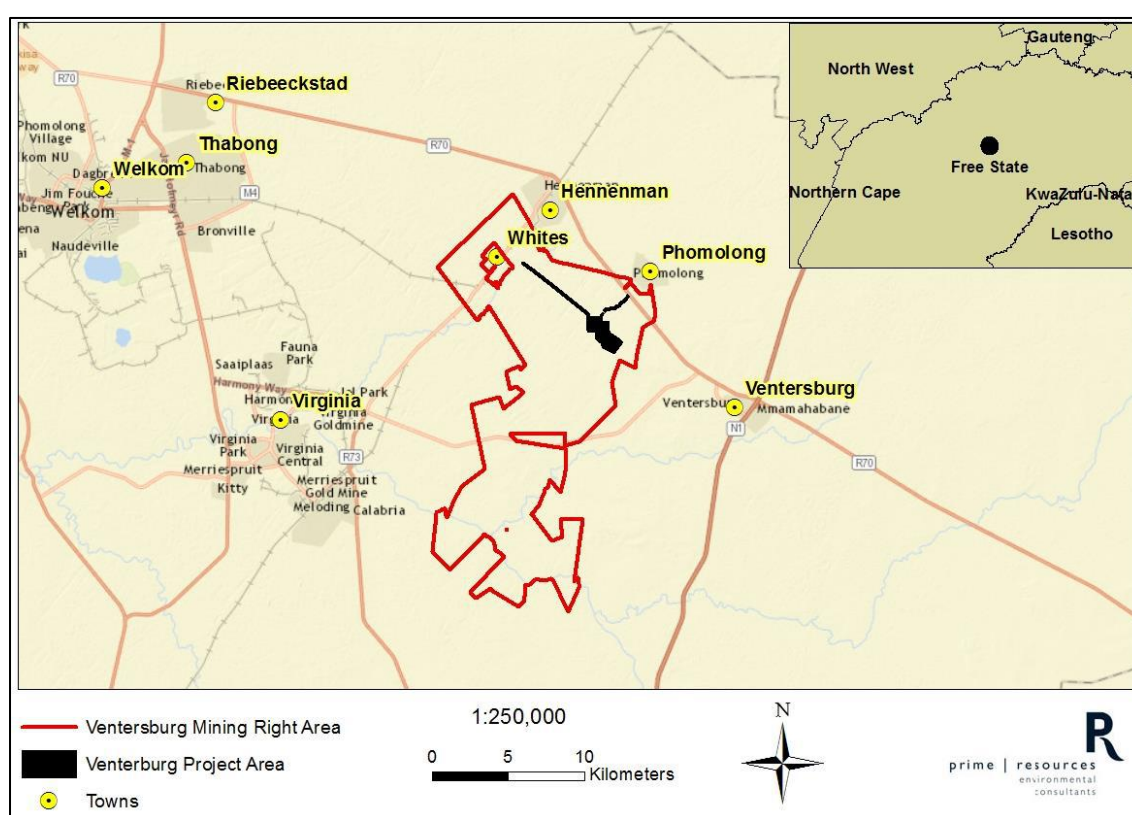


Figure 1. Ventersburg Gold Mine project area and Mining Right Area

2.2 Project description

The Ventersburg Gold Mine is anticipated to have a life of mine (LoM) of 17 years. The surface infrastructure will consist mainly of a shaft area and mining infrastructure, processing plant, a waste rock dump (WRD) and tailings storage facility (TSF), including storm water management measures for each of the surface infrastructure components. A water treatment plant will treat excess underground water, which will then be pumped to a discharge point at the Rietspruit.

The construction phase of the mine is envisaged to be four years. A period of 1 year has been assumed for decommissioning and rehabilitation. All surface infrastructure will be removed apart from the TSF, WRD and residual pollution control facilities. The area where the proposed surface infrastructure is to be removed will

be rehabilitated to be able to support a suitable land use based on the land capability and planning objectives for the area i.e., grazing land.

At the time of writing (March 2024), construction had not yet commenced.

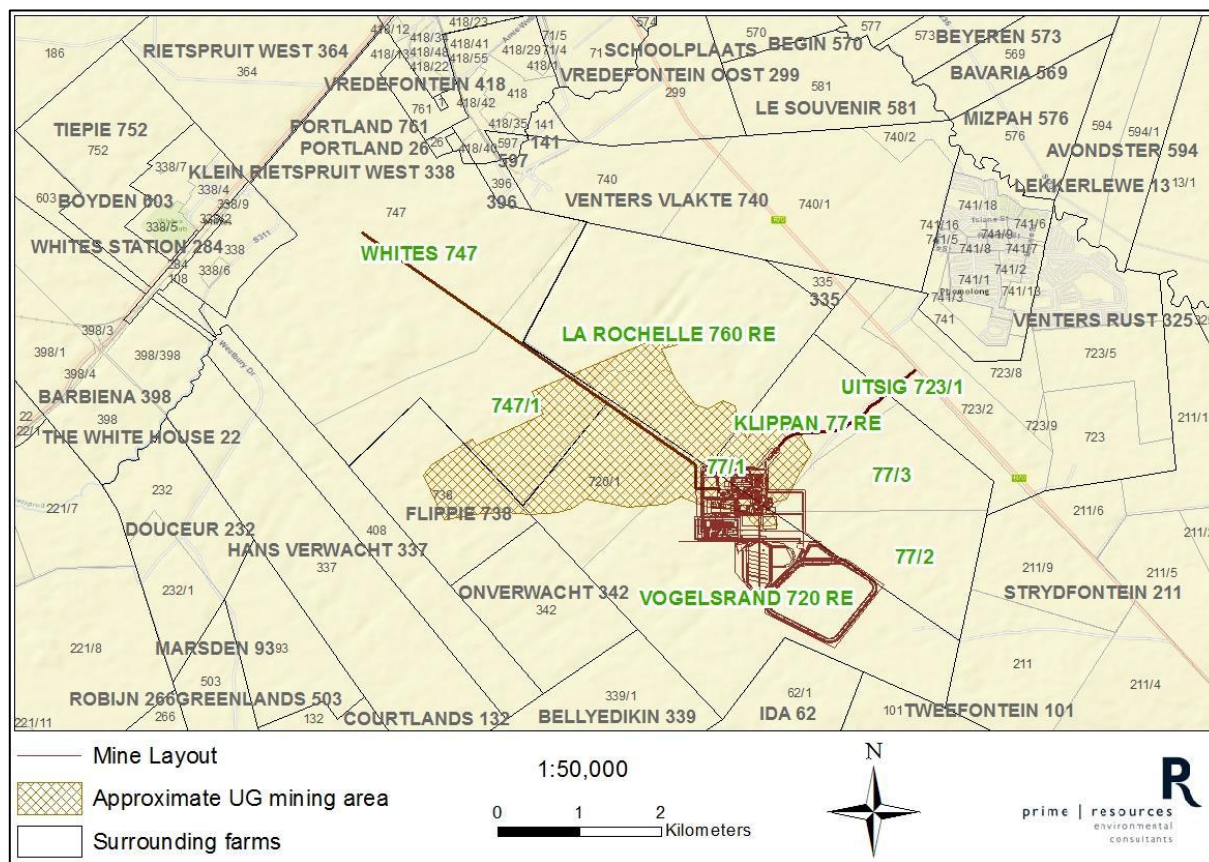


Figure 2. Ventersburg mining area and surface infrastructure (as per 2017 submission)

Note: The EIA for the Project was undertaken during 2016/2017 and submitted in June 2017, and again in September 2017, addressing comments made by the DMR. No changes were made to the project description or layout for the September 2017 submission. Environmental Authorisation was granted in January 2018.

As a parallel process, the Water Use Licence Application (WULA) was submitted in 2017 following several recommendations by the Department of Water and Sanitation. The final submission in November 2019 includes a slightly revised layout of the surface infrastructure, to avoid the 500m regulated zone around wetlands. Refer to Figure 3 and Figure 4. A Water Use Licence (WUL) was granted in February 2021.

There has been no update to the EMPr to date to account for the revised layout of surface infrastructure as per Figure 4. This audit is based on the September 2017 EMPr submission and will include in its recommendations that the EMPr must be updated prior to construction to reflect the revised layout of infrastructure and to ensure that it aligns with the final WULA submitted in November 2019.

2.3 Prospecting

No prospecting or drilling was taking place during the site visit. According to Gold One, exploration drilling was undertaken during 2022. Core samples were drilled in 22 locations; the holes were cased, sealed and rehabilitated after drilling. No exploration drilling was being undertaken at the time of site visit and compilation of this audit. No exploration drilling was being undertaken at the time of site visit and compilation

of this audit. Should drilling be undertaken at the time of the next audit, exploration activities must be considered and assessed against these conditions.

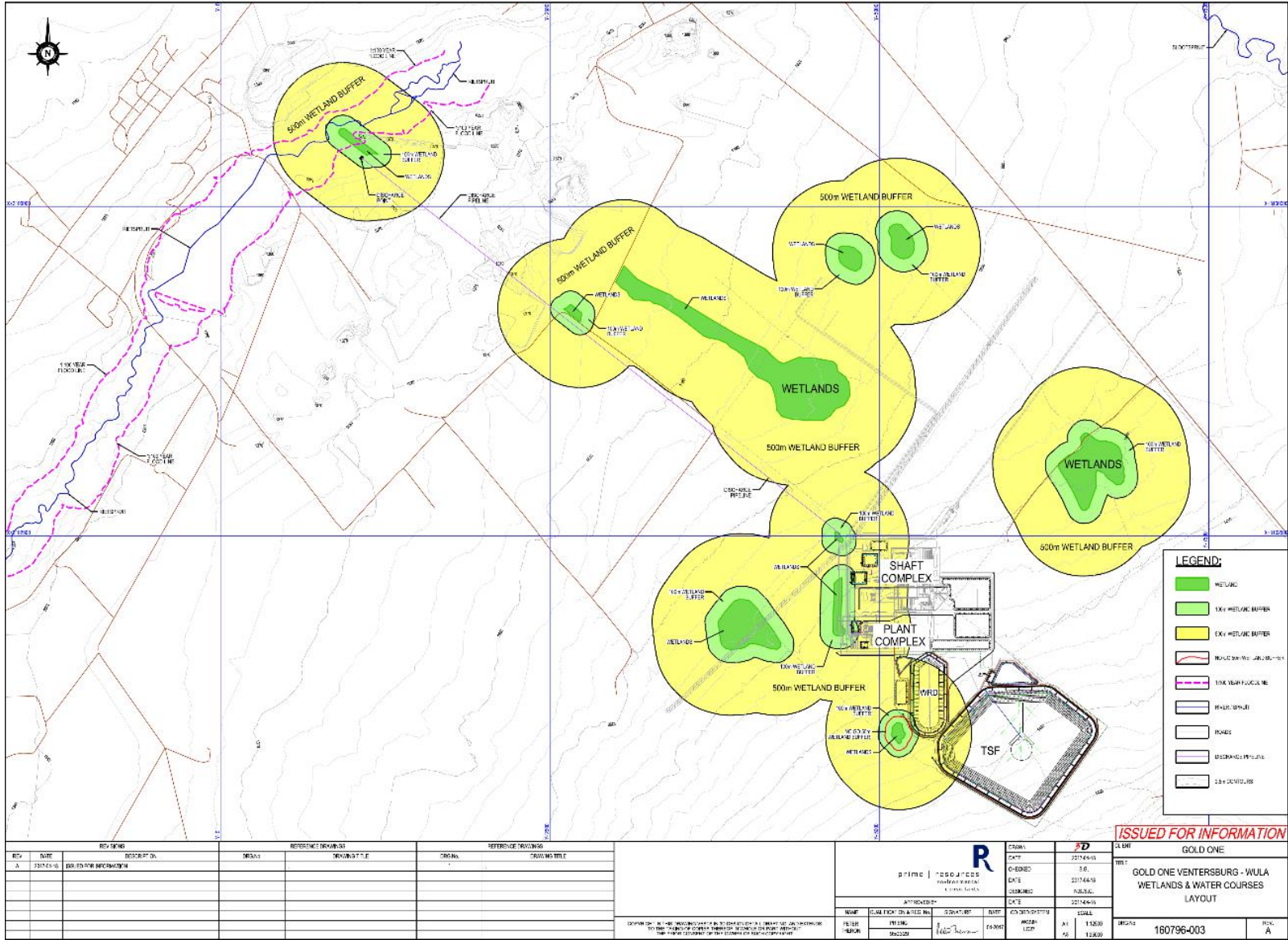


Figure 3. Surface infrastructure showing regulated area of wetlands (500m) (as per 2017 WULA submission and aligning with EMPr)

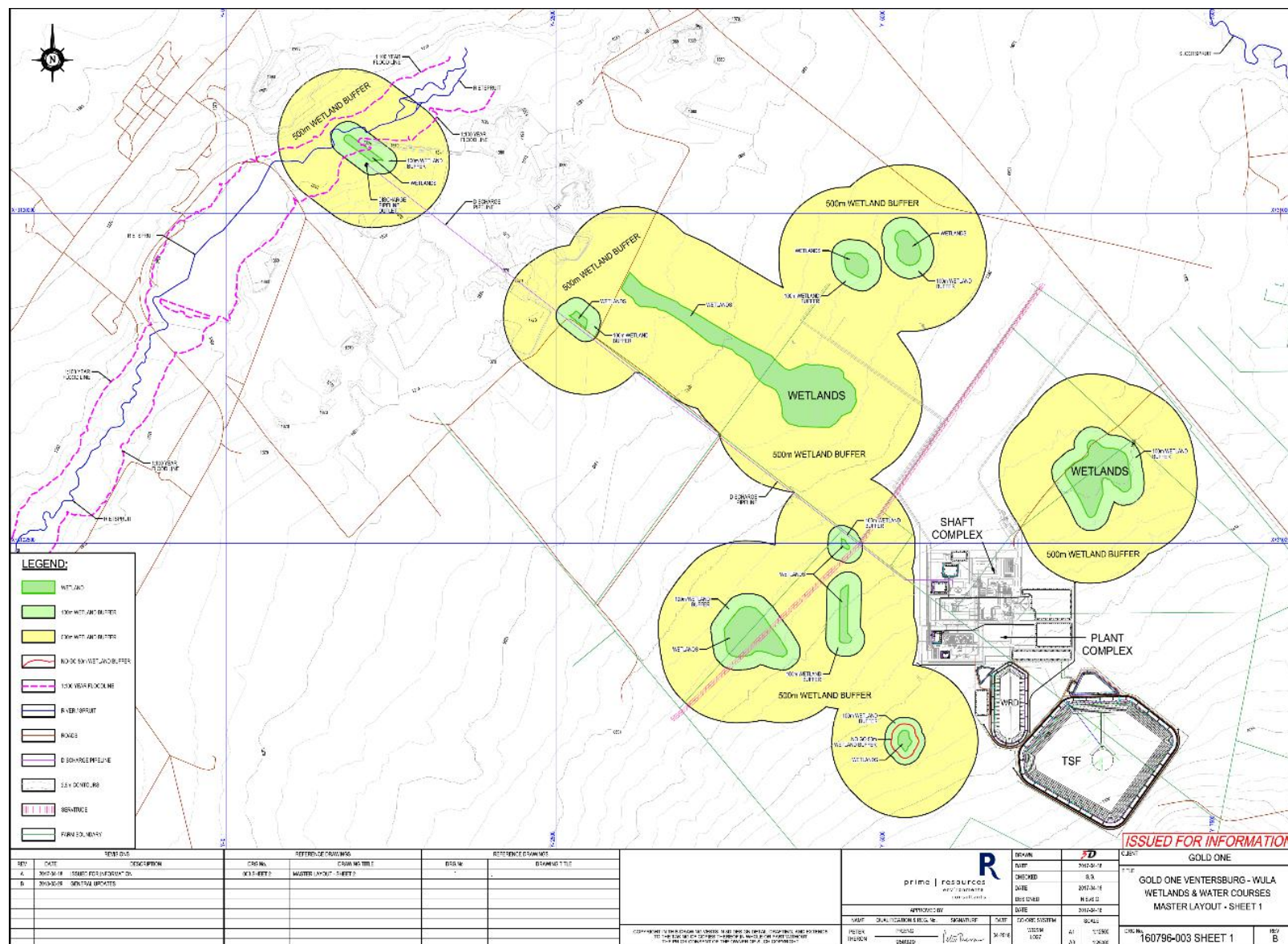


Figure 4. Revised surface infrastructure layout showing regulated area of wetlands (500m) (as per final 2019 WULA submission)

3 LEGAL FRAMEWORK

3.1 MPRDA (2002) and MPRDA Regulations (2004), as amended

Previously, Regulation 55 of the Mineral and Petroleum Resources Development Act No. 28 of 2002 (MPRDA) Regulations (GNR527 of 2004) addressed the monitoring and performance assessments of the EMPr. However, this was repealed by amendments to the MPRDA Regulations in 2020 (GNR420 of 2020), indicating that the content of Regulation 55 performance assessments (audits) is now regulated by Regulations 34 to 37 of the National Environmental Management Act (No. 107 of 1998) (NEMA) EIA Regulations.

3.2 NEMA (1998), as amended and EIA Regulations (2014), as amended

The Competent Authority (CA) for this Project is the Department of Mineral Resources and Energy (DMRE), Free State Regional Office, regulating in terms of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA) and the 2014 Environmental Impact Assessment (EIA) Regulations (GNR982) as amended.

EIA Regulations 34 to 37 (GNR982 of 2014 as amended) are relevant to the auditing of the Environmental Authorisation (EA) and Environmental Management Programme (EMPr) and are summarised below.

Regulation 34. Auditing of compliance with EA, EMPr and closure plan

- (1) The holder of an EA must, for the period during which the EA, EMPr and closure plan remain valid –
 - (a) ensure that compliance with the conditions of the EA, EMPr and closure plan, is audited; and
 - (b) submit an environmental audit report (EAR) to the DMRE
- (2) The EAR must –
 - (a) be prepared by an independent person with the relevant environmental auditing expertise
 - (b) provide verifiable findings, in a structured and systematic manner, on –
 - (i) performance against and compliance with the provisions of the EA, EMPr and closure plan; and
 - (ii) the ability of the measures contained in the EMPr and closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the Table 2; and
 - (c) be conducted and submitted to the CA at intervals as indicated in the EA.
- (3) The EAR must determine –
 - (a) the ability of the EMPr and closure plan to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis, and with the closure of the facility; and
 - (b) the level of compliance with the provisions of EA, EMPr and closure plan.
- (4) Where the findings of the EAR indicate –
 - (a) insufficient mitigation of environmental impacts; or
 - (b) insufficient levels of compliance with the EA, EMPr or closure plan;

the holder must submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the EAR.
- (5) When submitting recommendations, such recommendations must have been subjected to a public participation process, as agreed with the CA and as appropriate to bring the proposed amendment/s to the attention of potential and registered interested and affected parties (IAPs), for approval by the CA.

- (6) Within 7 days of submitting of an EAR to the CA, the holder of an EA must notify all potential and registered IAPs of the submission of that report, and make such report immediately available –
- (a) to anyone on request; and
 - (b) on a publicly accessible website, where the holder has such a website.
- (7) An EAR must contain all information set out in Appendix 7 to these Regulations.

Table 2. Contents of an Environmental Audit Report in terms of Appendix 7 of the EIA Regulations (2014)

Ref	Requirement	Section of report
3(1)(a)	The environmental audit report must contain details of - i. The independent person who prepared the environmental audit report; and ii. The expertise of the independent person that compiled the environmental audit report	Section 1.2
3(1)(b)	A declaration that the independent auditor is independent in a form as may be specified by the competent authority	Section 1.6 Appendix A
3(1)(c)	An indication of the scope of, and the purpose for which, the environmental audit report was prepared	Section 1.3 Section 4
3(1)(d)	A description of the methodology adopted in preparing the environmental audit report	Section 4
3(1)(e)	An indication of the ability of the EMPr, and where applicable, the closure plan, to i. Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking and closure of the activity on an ongoing basis ii. Ensure compliance with the provisions of the EA, EMPr, and where applicable, the closure plan	Section 6.2
3(1)(f)	A description of any assumptions made, and any uncertainties or gaps in knowledge	Section 1.7
3(1)(g)	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report	Section 1.5
3(1)(j)	A summary and copies of any comments that were received during any consultation process	Section 1.5
3(1)(k)	Any other information requested by the competent authority	Section 1.5

Regulation 35. Amendment of EMPr or closure plan as a result of an audit

- (1) The CA must consider the EAR and amended EMPr and closure plan, and approve such amended EMPr and amended closure plan, if it is satisfied that it sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity, or the closure of the facility, and that it has been subjected to an appropriate public participation process.
- (2) Prior to approving an amended EMPr or closure plan, the CA may request such amendments to the EMPr or closure plan as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity or to ensure that the closure plan sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the closure of the facility.

Regulation 36. Other amendments of EMPr or closure plan

- (1) Where an amendment is required to the impact management actions of an EMPr, such amendments may immediately be effected by the holder and reflected in the next EAR submitted as contemplated in the EA and regulation 34.
- (2) Where an amendment to the impact management outcomes or objectives of an EMPr or an amendment of the closure objectives of a closure plan is required before an audit is required in terms of the EA, an EMPr or closure plan may be amended on application by the holder of the EA.

Regulation 37. Amendment of EMPr or closure plan on application by holder of EA

- (1) Where the holder of an EA identifies amendments to the impact management outcomes or objectives of the EMPr or amendments to the closure objectives of the closure plan before an audit is required in terms of the EA, such holder must notify the CA of its intention to amend the EMPr or closure plan at least 60 days prior to submitting such amendments to the EMPr or closure plan to the CA for approval.
- (2) The holder of the EA must invite comments on the proposed amendments to the impact management outcomes or objectives of the EMPr or amendments to the closure objectives of the closure plan from potential IAPs, including the CA, by using any of the methods provided for in the Act for a period of at least 30 days.
- (3) Reasonable alternative methods, as agreed to by the CA, to invite comments may be used in those instances where a person desires but is unable to participate in the process due to –
 - (a) illiteracy
 - (b) disability, or
 - (c) any other disadvantage.
- (4) The invitation to comment must include an indication that any comments to the proposed amendments must be submitted to the holder of the EA within 30 days of such invitation.
- (5) If no comments are received, the holder of the EA may amend the EMPr or closure plan in accordance with its intention and submit the amended EMPr or closure plan to the CA for approval within 60 days of inviting comments.
- (6) Prior to approving an amended EMPr or closure plan contemplated in sub-regulation (5), the CA may request such amendments to the EMPr or closure plan as it deems appropriate to ensure that the EMPr sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity or to ensure that the closure plan sufficiently provides for avoidance, management and mitigation of environmental impacts associated with the closure of the facility.
- (7) If comments are submitted to the holder of the EA, such holder must submit such comments to the CA, including responses to such comments, together with the proposed amended EMPr or closure plan.
- (8) The CA must, within 30 days of receipt of the information consider such information and issue a decision to approve the amended EMPr or closure plan or not.
- (9) After the CA has reached a decision, the CA must, within 5 days –
 - (a) provide the holder of the EA with its decision, including the amended EMPr or closure plan if the decision was to approve the amended EMPr or closure plan, as well as reasons for the decision
 - (b) draw the attention of the holder of the EA to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations; and
 - (c) instruct the holder of the EA to, within 14 days of the date of the decision, inform the parties who submitted comments on the decision, to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations.

4 OBJECTIVES AND CONTENTS OF ENVIRONMENTAL AUDIT REPORT

The EAR is focussed on compliance with measures and conditions of the:

- Environmental Impact Assessment Report and **Environmental Management Programme Report** for the Ventersburg Gold Mine. September 2017. DMRE reference FS 30/5/1/2/2/1036 MR.
- **Integrated Environmental Authorisation** issued to Gold One Africa Ltd on 9 January 2018 in terms of the NEMA as amended, the EIA Regulations, 2014, and the National Environmental Management: Waste Act Regulations, 2013

4.1 Objectives

In terms of Appendix 7 of the NEMA EIA Regulations (2014), the EAR must provide for recommendations regarding the need to amend the EMPr. The objectives of the EAR are to –

- Report on the level of compliance with the conditions of the EA and the EMPr, and the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr
- Identify and assess any new impacts and risks
- Evaluate the effectiveness of the EMPr
- Identify shortcomings in the EMPr, and
- Identify the need for any changes to the measures provided for in the EMPr.

4.2 Content

Table 2 outlines the required information to be provided in an EAR as per Appendix 7 of the EIA Regulations.

4.3 Frequency of reporting

According to Regulation 34 of the NEMA EIA Regulations (2014), the environmental audit must be conducted and submitted to the CA at intervals as indicated in the EA. The Ventersburg Gold Mine EA requires that an EAR be compiled by an independent specialist and submitted to the DMRE annually, as required in terms of Section 24Q of the NEMA.

4.4 Period applicable to this assessment

The previous EAR was compiled and submitted in December 2021. The audit review period for this assessment is January 2022 to March 2024.

5 ASSESSMENT OF COMPLIANCE

According to Regulation 34 of the NEMA EIA Regulations (2014), the environmental audit must be conducted and submitted to the CA at intervals as indicated in the EA. The Ventersburg EA requires that an EAR be compiled by an independent specialist and submitted to the DMRE **annually**, as required in terms of Section 24Q of the NEMA.

The following was used as a procedure for the compliance assessment:

- Creation of a checklist of all commitments and conditions indicated in the EMPr and EA
- Consideration of compliance with the commitments and conditions
- Interviews with mine personnel where necessary to confirm the assessment.

5.1 Rationale for scoring system

The performance of the site is audited in terms of a rating system, with the final score calculated and presented as a percentage. An average compliance score is determined from which the overall compliance percentage is determined.

- Where an item is in full compliance with a particular condition, the maximum score is awarded, i.e., 2 / 2 (C).
- When the site only partially complies with a condition, half of the maximum score is awarded, i.e., 1 / 2 (PC).
- When the site does not comply with a condition at all, zero points are awarded (NC).
- If a condition is not pertinent or currently applicable, compliance with that condition will be scored as Not Applicable or Not Audited (NA) and no points are allocated or included in the final score.

An average compliance score is determined from which the overall compliance percentage is determined. All conditions and commitments are valued equally; no weighting has been taken into account.

Assessment of compliance with the EA conditions is addressed in Table 5 and Appendix 1.

Assessment of compliance with the EMPr is addressed in Table 7 and Appendix 2.

Table 3. Compliance scores used for the environmental audit

Criteria	Scoring
Compliant	2
Partially compliant	1
Non-compliant	0
Not applicable / Noted	-

5.2 Audit ratings

As construction for the Ventersburg Project has not yet commenced, many of the conditions of the EA and EMPr are not applicable to the Project and the Project's compliance with respect to these conditions can only be assessed once construction and operation activities commence.

5.3 Audit findings

Overall compliance in terms of the EA and EMPr is shown in Table 4.

Table 4. Overall compliance in terms of the EA and EMPr

Description	EA 2024	EA 2021	EMPr 2024	EMPr 2021
Σ Total Compliance Score	35	36	12	10
No. Conditions Audited	20	18	7	6
Compliance Percentage (%)	87.5 %	83.3 %	85.7 %	83.3 %

Table 5. Update on previous partial and non-compliances in the EA compliance audit

No.	EA condition	2021	Mar 2024	Comments
Department standard EA conditions				
1. Scope of Authorisation				
13	1.4 Where any of the holder of the EA contact details change including name of the responsible person, physical or postal address / or telephonic details, the holder of the EA must notify the Department as soon as the new details become known to the holder of the EA.	PC	C	The contact details for Gold One Africa have been updated and the DMRE was informed of these changes in the 2021 EAR. Gold One should follow this up with a formal letter to the Department.
7. Emergency preparedness plan				
	7.1 The holder of the EA must maintain and implement an emergency preparedness plan and review it bi-annually when conducting audits and after each emergency and or major accident. The plan must, amongst others, include:			
115	7.1.4 Industrial action, and	NC	NC	The EPRP does not address industrial action.
116	7.1.5 Contact details of police, ambulances, and any emergency centre closer to the site	NC	NC	The EPRP does not contain contact details for the local police, ambulance or emergency centre

Table 6. Current compliance with the EA (partial and non-compliance only)

No.	EA condition	March 2024	Comments
	Reporting to the department		
96	5.1.1 Submit an Environmental Audit Report to this Department annually and such report must be done by an independent person with relevant environmental audit expertise to compile an environmental audit report. The environmental audit must be in line with regulation 34 and appendix 7 of the EIA Regulations and specify whether conditions of this EA and an approved EMP are adhered to	PC	This report serves as the second Environmental Audit Report. It covers the period January 2022 - March 2024. The next EAR report should be undertaken in March 2025 to ensure compliance with annual submission of the EAR.
7. Emergency preparedness plan			
	7.1 The holder of the EA must maintain and implement an emergency preparedness plan and review it bi-annually when conducting audits and after each emergency and or major accident. The plan must, amongst others, include:		
115	7.1.4 Industrial action, and	NC	The EPRP does not address industrial action.
116	7.1.5 Contact details of police, ambulances, and any emergency centre closer to the site	NC	The EPRP does not contain contact details for the local police, ambulance or emergency centre

Table 7. Current compliance with the EMPr (partial and non-compliance only) and update on previous partial and non-compliances in the EMPr compliance audit

No.	EMPr commitment	Date	Mar 2024	Comments
Biodiversity management measures – Prior to construction				
31	Appoint a botanist to compile an alien invasive species monitoring and eradication plan for alien and invasive species present on site requiring control (possibly <i>Cirsium vulgare</i> (Savi) Ten., <i>Pyracantha cf coccinea</i> M.Roem., <i>Tamarix chinensis</i> Lour., <i>Verbena bonariensis</i> L. and <i>Xanthium spinosum</i> L.) based on the findings of the survey and submit the plan to DESTEA for approval.	PC	PC	An invasive species control plan has been developed in for the site (submitted in support of the WULA.) This plan should be submitted to DESTEA for approval.
Water management measures – Construction and operation				
	Water quality analysis, biomonitoring and sediment quality analysis must be conducted as detailed in the Hydrology Monitoring Programme.	PC	PC	A comprehensive water monitoring programme was submitted on 21 July 2021; and an updated programme was submitted on 29 September 2021. A biomonitoring programme and report were submitted on 29 September 2021. A water monitoring report was compiled for the dry season and submitted on 29 September 2021. Wet season baseline monitoring was undertaken and submitted in February 2022. An updated Environmental Assessment and Monitoring Programme incorporating bio-monitoring and eco-toxicology data was submitted on 9 May 2022. Sediment sampling for metal analysis was not undertaken and should be undertaken once prior to construction.

5.4 Site photographs

Table 8. Site photographs (14 March 2024)

	
<p>Figure 5. Baling and hay storage area</p>	<p>Figure 6. Field for livestock grazing and homestead in the background amongst the trees</p>
	
<p>Figure 7. Wetland area</p>	<p>Figure 8. Field for livestock grazing with a water trough</p>



Figure 9. Homestead (Mr Vogel) in the background



Figure 10. Field for livestock grazing



Figure 11. Agricultural activities



Figure 12. Agricultural activities

6 CONCLUSIONS AND RECOMMENDATIONS

This environmental audit report was compiled to comply with the legislative requirements of NEMA, conditions of the IEA, and commitments made in the EMPr. The audit report will be submitted to the DMRE Free State Province. **Within 7 days of submission of this audit report to the DMRE, Gold One Africa Ltd will notify all potential and registered IAPs of the submission and make this report immediately available on its website and to anyone on request.**

6.1 Compliance scores

At the time of the audit, the Project was in the pre-construction phase. Many of the EMPr commitments and EA conditions are associated with the subsequent project phases (construction, operation, and closure). Therefore, these mitigation measures and EA conditions were not applicable to the current stage of the project and could not be adequately assessed in terms of Section 3.2. However, they will be assessed in future audits once the various phases commence.

A total of 286 EMPr commitments and 111 EA conditions were evaluated during the audit. The compliance scores against the EMPr and EA are shown Table 6 and Table 7. **Of the 7 auditable commitments in the EMPr, the site scored 85.7 %. Of the 20 auditable conditions of the EA, the site scored 87.5 %.**

6.1.1 Compliance with the EA

Of the 20 conditions that were auditable, two were considered non-compliant. These were related to the content of the Environmental Preparedness and Response Plan (EPRP) (which does not contain measures related to the risk of industrial action or contact details for the local police, ambulance, or emergency centre), and the compilation of the annual EAR.

One condition was considered partially compliant.

- This report covers a two-year period (January 2022-2024). Future audits should be compiled and submitted annually to ensure compliance.

6.1.2 Compliance with the EMPr

Due to the phase of the Project, only 7 of the EMPr commitments were relevant to the activities taking place at the time of the audit. Two of these were considered partially compliant at the previous audit, and again in the current audit:

- Water quality analysis and biomonitoring were undertaken in May 2021 and reported in August 2021 as part of the dry season monitoring, and wet season baseline monitoring undertaken in February 2022 as per the WUL requirements. An updated Environmental Assessment and Monitoring Programme incorporating bio-monitoring and eco-toxicology data was submitted on 9 May 2022. Sediment analysis was not undertaken.
- An Alien Invasive Plant (AIP) management and monitoring plan was submitted to the DWS in support of the WULA on 29 March 2021. This plan should be submitted to the Department of Small Business Development, Tourism and Environmental Affairs (DESTEA) for approval.

6.2 Adequacy of the Ventersburg EMPr

The EMPr is considered effective but this cannot be confirmed as no activities were taking place at the time of the site visit. No new risks or impacts were identified during the site visit, nor were any shortcomings identified in the EMPr.

Updates to the site layout have been undertaken since the approval of the EMPr to place infrastructure out of the 500m regulated zone of wetlands, for the purposes of the Water Use Licence Application (WULA). The EMPr should be updated to reflect these minor changes to the layout.

6.3 EMPr recommendation report

Regulation 34 of the NEMA EIA Regulations (2014) requires the holder of the EA to submit recommendations to amend the EMPr or closure plan where findings of the EAR indicate:

- Insufficient mitigation of environmental impacts associated with the undertaking of activity
- Insufficient levels of compliance with the EA or EMPr.

Based on the findings of the audit no recommendation for the amendment is proposed in terms of Regulation 35 of the EIA Regulations (Section 3.2). However, with the amendments to the site layout to satisfy WULA requirements, it is recommended that the EMPr is amended in terms of Regulation 36(2) of the EIA Regulations (2014). These changes do not include any new listed activities in terms of NEMA, nor do they present any additional or significant environmental or social impacts. Once amended, the EMPr will be submitted to the DMRE for approval prior to the project entering the construction phase. The EMPr updates are not required to be subjected to a public participation process however, registered IAPs must be notified of the changes to the EMPr. This should be conducted prior to construction.

6.4 Financial Provision and Rehabilitation

The latest annual revision of the financial provision was undertaken by Umhlaba Environmental Consulting CC in November 2023 and submitted to the DMRE in February 2024, in line with the requirements of NEMA Financial Provisioning Regulations (GN1147 of 2015). Prior to this a Rehabilitation Plan for the Ventersburg Gold Mine was prepared and submitted in December 2021 (Prime Resources, 2021). No activity has commenced on site to result in additional environmental liabilities. Considering the fact that construction activities had not yet begun, it was motivated that the content of the initial assessments and first revision are still relevant, and the respective amounts could be increased by inflation.

Table 9 reflects the 2017 (original) financial provision for the Project, the 2021 (first annual update after approval) financial provision, and the 2023 second annual update.

Table 9. Financial provision calculations for closure for Ventersburg Gold Mine

2017	2021	2023
R 127,601,945	R 150,804,134	R 171,011,888

6.5 Recommended actions

The audit identified several commitments and conditions that should be addressed prior to construction but may not yet be relevant, considering the unknown timeframe for construction. While these commitments were not considered non-compliant or partially compliant, recommendations are provided below to address these timeously. Timeframes for construction must be determined. As per condition 3.45, the EA is valid for 10 years, provided that commencement of the activity takes place before January 2028. Construction actions should be planned to align with the following commitments:

6.5.1 Prior to construction

One to two years prior to construction

- Obtain approval for minor layout changes in the EMPr (Section 6.3) to satisfy WULA requirements in terms of Regulation 36(2) of the EIA Regulations (2014).
- Air quality monitoring should commence at least one year prior to the construction phase to allow for the collection of an ambient air quality baseline data set.
- Additional radiological data must be collected at least two years before mining commences. In parallel, a comprehensive application must be prepared and submitted to the NNR.
- Visual screening commitments such as planting of trees must commence as soon as possible.

Prior to commencement of construction

- Annual Rehabilitation Plan for the Ventersburg Gold Mine should be prepared in terms of the NEMA Financial Provisioning Regulations (GN1147 of 2015).
- A weather station is required to be installed on site prior to construction.
- Relevant archaeological training material must be compiled and incorporated into the environmental awareness plan.
- A summer botanical survey must be undertaken. This will inform the need to obtain relocation permits for protected plant species in terms of NEM:BA. A fire management plan must also be compiled.
- The Alien Invasive Plant (AIP) management and monitoring plan compiled in 2021 should be submitted to DESTEA for approval.
- As part of the aquatic biomonitoring requirements, sediment sampling for metal analysis should be undertaken once prior to construction.
- A structural survey is required to be undertaken prior to any blasting.
- Agreements with landowners must be finalised.
- Livelihood restoration opportunities for farmworkers must be investigated and finalised.
- A Stakeholder Engagement Plan and grievance mechanism should be established and communicated to IAPs.
- The fenced boundary of the social buffer must be established.
- Recruitment and procurement policies and procedures must be compiled.
- An in-migration management plan, compiled with the input of the local municipality.
- Relevant documentation must be put in place to ensure an adequate grievance management / complaints procedure, health awareness programmes, procedures for reporting illegal mining, ongoing communication with communities, and good relationships with employees.
- Existing locally sourced accommodation for employees and contractors must be considered.
- Environmental awareness training material must be compiled and put in place.
- Gold One Africa must bear in mind the requirements for road and intersection upgrades, as well as relevant pedestrian crossings and appropriate notification signage.
- A standalone Emergency Preparedness and Response Plan (EPRP) should be compiled that includes industrial action and emergency services contact details.
- Gold One Africa must take note of the requirement for an amendment to the land use zoning, which must be finalised prior to construction.

6.6 Conclusions

In terms of Regulation 34 of the EIA Regulations, within 7 days of the date of submission of the EAR to the DMRE, Gold One Africa is required to notify all potential and registered IAPs of the submission of the report, to and make the report immediately available - (a) to anyone on request; and (b) on a publicly accessible website, if such a website is available.

APPENDIX 1

EA COMPLIANCE CHECKLIST 2024

APPENDIX 2

EMPR COMPLIANCE CHECKLIST 2024