



GOEDEHOOP COLLIERY: SOUTH BULFONTEIN EXTENSION

EXTERNAL ENVIRONMENTAL PERFORMANCE ASSESSMENT REPORT 2024 - 2025

In Compliance with Regulation 34 and Appendix 7 of the Environmental Impact Assessment Regulations (GN 982 of 2014), as amended, Section 24N(7)(d) of the National Environmental Management Act (Act 107 of 1998) and Regulation 55 of the Mineral Resources and Petroleum Development Regulations (GNR 527 of 23 April 2004), as amended.

AUDIT DATES: 25 – 29 August 2025

**DARDLEA REFERENCES:
MP 30/5/1/2/2/124 MR; MP 30/5/1/2/3/2/1/124 EM**

PREPARED BY:

NTC GROUP (PTY) LTD
CDH BUILDING
1 PROTEA PLACE
SANDTON
2031
TEL: +27 11 568 4701
EMAIL: teboho@ntcgroup.co.za

PREPARED FOR:

GOEDEHOOP COLLIERY
PO BOX 1521
SAXONWOLD
2132
SOUTH AFRICA
TEL: 013 691 5532
EMAIL: marthinus van Wyk@thungela.com

DOCUMENT CONTROL

VERSION CONTROL

NO.	AUTHOR	CHANGES	DATE
0.1	Teboho Motinyane	Compile Report	15.12.2025
0.2	Raisibe Mabiza	Review Report	15.12.2025
0.3	Marthinus van Wyk	Authorise Report	

REQUIRED APPROVAL

NAME	POSITION	DATE
Marthinus van Wyk	Goedehoop Colliery: Environmental Superintendent	

DISTRIBUTION LIST

NAME	EMAIL ADDRESS
Marthinus van Vyk	marthinus.van.Wyk@thungela.com
Nadine Joubert	nadine.joubert@thungela.com
Kgaowelo Moshokwa	kgaowelo.moshokwa@thungela.com

RELATED DOCUMENTS

NO.	DOCUMENT	DATE
0.1	Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme (Ref: (MP) 30/5/1/2/2/(124) MR approved 08 September 2015.	08.09.2015

DISCLAIMER AND TERMS OF USE

This document has been prepared by NTC Group (Pty) Ltd with reasonable skill, care, diligence and due consideration of the manpower, timeframes and resources assigned to it in terms of their appointment by Thungela Resources (Pty) Ltd (the client) to carry out part or all the services. It is subject to the terms and conditions of that appointment. NTC Group (Pty) Ltd shall not be liable for the use of, or reliance on any information, advice, recommendations or opinions in this document for any purpose and by any person other than the client. Reliance may be granted to a third party only if NTC Group (Pty) Ltd and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by NTC Group (Pty) Ltd, and/or information supplied by the client and/or its advisors and associates. This data has been accepted in good faith as being accurate and valid.

NTC Group (Pty) Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work. The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in NTC Group (Pty) Ltd, unless the terms of appointment state otherwise.

This document may contain information of a specialised and/ or highly technical nature and the client is advised to seek clarification on any elements which may be unclear to it. Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

TABLE OF CONTENTS

NO.	DESCRIPTION	PAGE NO
1.	INTRODUCTION.....	1
1.1.	GOEDEHOOP COLLIERY.....	1
2.	PERFORMANCE ASSESSMENT TERMS OF REFERENCE.....	4
2.1.	MINERAL AND PETROLEUM RESOURCES DEVELOPMENT REGULATIONS (GN R527 OF 23 APRIL 2023).....	4
2.2.	ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN R982 OF 04 DECEMBER 2014) 4	
2.3.	GOEDEHOOP SOUTH COLLIERY ENVIRONMENTAL AUTHORISATIONS.....	5
2.4.	GOEDEHOOP SOUTH COLLIERY ENVIRONMENTAL MANAGEMENT PROGRAMMES.....	5
2.5.	ASSUMPTIONS AND LIMITATIONS	5
3.	PERFORMANCE ASSESSMENT DETAILS	7
3.1.	AUDIT TEAM.....	7
3.2.	PERFORMANCE ASSESSMENT METHODOLOGY	7
3.3.	PERFORMANCE ASSESSMENT SCOPE.....	9
4.	PERFORMANCE ASSESSMENT RESULTS.....	9
5.	SUMMARY OF THE AUDIT FINDINGS.....	17
5.1.	NON-COMPLIANCES	17
5.2.	ACTIONS TO ADDRESS THE NON-COMPLIANCES	17
5.3.	RECOMMENDATIONS TO AMMEND CERTAIN CONDITION	17
6.	CONTINUAL IMPROVEMENT	17
7.	CONCLUSION.....	17
8.	REFERENCES.....	18

LIST OF FIGURES

Figure 1. Locality Map of Goedehoop South Colliery	3
--	---

LIST OF TABLES

Table 1: Details of the Audit Team	7
Table 2: Assessment Criteria	8
TABLE 3. GOEDEHOOP COLLIERY BULTFONTEIN EXTENSION ALIGNED ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME (DMRE REF: (MP) 30/5/1/2/2/ (124) MR APPROVED 08 SEPTEMBER 2015)	10

LIST OF APPENDICES

APPENDIX A: Auditors Declaration	
APPENDIX B: Auditors Curriculum Vitae	

1. INTRODUCTION

Thungela Resources (Pty) Ltd (hereafter, Thungela) is a South African based thermal coal producer and exports coal mainly to Indian, Asian, SEA, Middle East and North African markets. Thungela owns interests in and produces its thermal coal from eight mining operations. Opencast Mining Operations are undertaken at the Isibonelo, Khwezela and Mafube mining operations and Underground Mining Operations are undertaken at the Zibulo, Greenside, Goedehoop and Elders (currently in construction) mining operations. Thungela Services Operation provides various services to support the mining operations.

Thungela appointed NTC Group (Pty) Ltd as an independent Environmental Practitioner to undertake the annual external environmental performance assessment in accordance with Regulation 34 and Appendix 7 of the Environmental Impact Assessment (EIA) Regulations (GN R982 of 04 December 2014), as amended, Section 24N (7)(d) of the National Environmental Management Act (NEMA) (Act 107 of 1998) and Regulation 55 of the Mineral Resources and Petroleum Development (MRPD) Regulations (GNR 527 of 23 April 2004), as amended, to assess their compliance with the Environmental Authorisations (EA) and Environmental Management Programmes (EMPr) issued to its operations. This report forms part of the performance assessments undertaken at the Goedehoop Colliery.

1.1. GOEDEHOOP COLLIERY

Goedehoop Colliery is an underground mining operation located approximately 15 - 25 km south-east of eMalahleni, within the eMalahleni and Steve Tshwete Local Municipalities and the Nkangala District Municipality in Mpumalanga. Goedehoop Colliery is subdivided into the Goedehoop North Colliery (previously Bank Colliery) and Goedehoop South Colliery (previously Goedehoop Colliery). Goedehoop North Colliery is currently the only active mining section with a remaining Life-of-Mine (LoM) ending in 2024. Mining operations at Goedehoop South Colliery ceased in 2019 and has since been in process of rehabilitation and closure.

Mining operations at Goedehoop Colliery commenced at the Hope 2 Seam Shaft in April 1983 and extended to the Vlakraagte 2 Seam in September 1995 and 4 Seam mines in October 1995. Goedehoop Colliery and Bank Colliery (Goedehoop North) merged in 2005, with production from two underground shaft complexes. Goedehoop North Colliery operates under Mining Right MP 30/5/1/2/2/ (143) MR and Goedehoop South Colliery under Mining Right MP 30/5/1/2/2/1 (122) MR issued by the Department of Mineral Resources and Energy (DMRE) in terms of Section 39 (6) (now largely repealed) of the Mineral and Petroleum Resources Development Act (Act 28 of 2002) as well as the Environmental Management Programmes approved by the DMRE.

1.1.1. Goedehoop South Colliery

Goedehoop South Colliery shown in Figure 1, includes the Hope Section, Vlaklaagte Section and Springbok Section and cover an area of approximately 13 614 Ha. Coal mining at Goedehoop South Colliery ceased in 2019 and the area currently under a rehabilitation and maintenance programme. The current LoM for Goedehoop South Colliery has 9 years remaining, ending in 2033. Rehabilitated areas and facilities at Goedehoop South Colliery include:

- Hostels and the Springbok school.
- Block7, Block 8, Vlaklaagte Block 14, Hope Shaft, Klein Shaft, Seam 4 shaft and Block 20 inclusive of the conveyor belt.
- Main Offices.
- Springbok water treatment plant, security offices and sewage treatment plant.
- Hope water treatment plant and Goedehoop biodisk sewage plant.

The only remaining activity at Goedehoop South Colliery is the reclamation of the Discard Dump which is undertaken by a joint venture with Nasonti (Pty) Ltd. The Discard Dump reclamation includes a processing plant for the coarse discard which was constructed on top of the Discard Dump.

This report presents the Performance Assessment Report (PAR) for Goedehoop South Colliery to verify compliance with the conditions of the EAs and EMPs that remained valid for the assessment period (August 2024 – July 2025) and to determine the effectiveness of mitigation measures implemented to manage environmental impacts associated with their authorised activities.

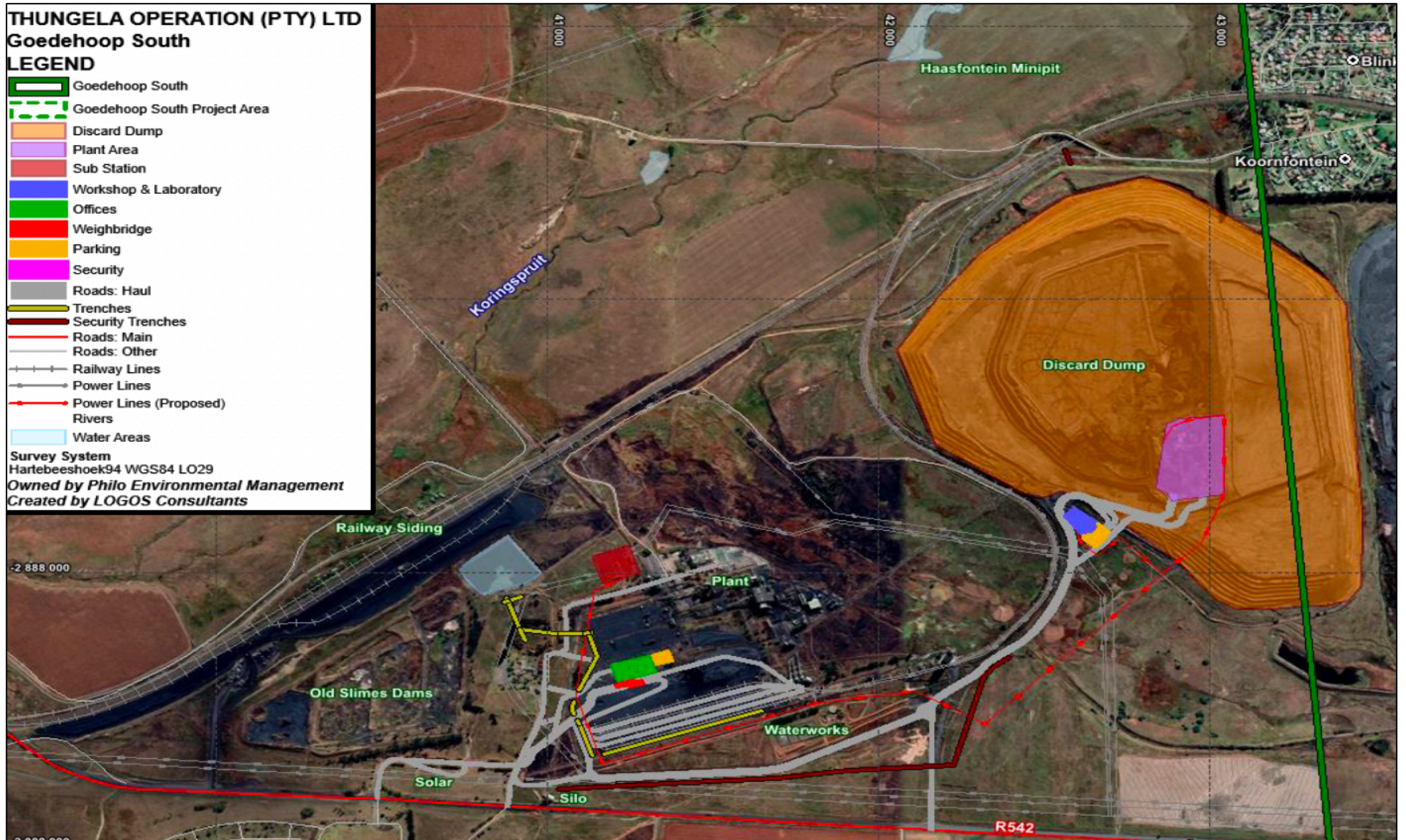


Figure 1. Locality Map of the Goedehoop South Colliery

2. PERFORMANCE ASSESSMENT TERMS OF REFERENCE

2.1. MINERAL AND PETROLEUM RESOURCES DEVELOPMENT REGULATIONS (GN R527 OF 23 APRIL 2023)

The performance assessment is undertaken in accordance with Regulation 55 of the MPRD Regulations (GN R527 of 23 April 2004) published in terms of the MPRD Act (Act 28 of 2002). Regulation 55 (1) of the MPRD Regulations requires that a monitoring and performance assessments be undertaken to assess the continued appropriateness and adequacy of the Environmental Management Programme. A Performance Assessment Report must be compiled and submitted to the Department of Mineral Resources and Energy. Regulations 55 (2) states that the frequency for undertaking the performance assessment must be in accordance with the Environmental Management Programme, or every two years, or as agreed to in writing by the Minister. Regulation 55(4) requires that the performance assessment be conducted by an independent competent person(s).

The amendment of the MPRD Act (Act 28 of 2002) in 2014, included the repeal of Sections 39 – 42 and the insertion of Section 38 A and B to align the requirements for Environmental Management Programmes contained in the National Environmental Management Act (NEMA) (Act 107 of 1998). Section 38B of the MPRDA (Act 28 of 2002), as amended, states that *“an environmental management plan or environmental management programme approved in terms of this Act before and at the time of the coming into effect of the National Environmental Management Act, 1998 shall be deemed to have been approved and an environmental authorisation been issued in terms of the National Environmental Management Act, 1998”*.

2.2. ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (GN R982 OF 04 DECEMBER 2014)

The EIA Regulations (GN R982 of 08 December 2014), as amended, were published in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998) to regulate the process for preparing, evaluating, and submitting applications for EAs. Section 34 of the EIA Regulations (GN R982 of 2014) provides the requirements for auditing the compliance with EAs, EMPs and Closure Plans. Section 34 (1) and (2) requires the holder of an EA to appoint an independent person to conduct an audit of all valid EAs and EMPs at the intervals specified in the EA and submit an audit report to the Competent Authority.

The audit report must include the information in Appendix 7 and as per Section 34 (3) must contain verifiable audit findings which are presented in a structured approach to indicate the level of compliance with the EAs and EMPs and the effectiveness of the mitigation measures in the EMP to manage environmental impacts associated with the authorised activities.

In terms of Section 34 (4), if there is insufficient compliance with the conditions of the EA or EMPr, or if mitigation measures in the EMPr for managing environmental impacts are deemed to be inadequate, the audit report must provide recommendations to amend the EMPr to rectify the shortcomings. Section 34 (5) states that such recommendations must be subjected to a Public Participation Process and Section 34 (6) that I&APS must be notified on a public website within 7 days of submitting the report to the Competent Authority.

2.3. GOEDEHOOP SOUTH COLLIERY ENVIRONMENTAL AUTHORISATIONS

The Environmental Authorisation issued to Goedehoop South Colliery that remained valid for the audit period and was audited in accordance with Section 34 of the EIA Regulations (GN R982 of 2014) and Section 55 of the MPRD Regulations (GNR 527 of 2004):

1. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme (Ref: (MP) 30/5/1/2/2/ (124) MR approved 08 September 2015.

2.4. GOEDEHOOP SOUTH COLLIERY ENVIRONMENTAL MANAGEMENT PROGRAMMES

The Environmental Management Programmes issued to Goedehoop South Colliery that remained valid for the audit period and was audited in accordance with Section 34 of the EIA Regulations (GN R982 of 2014) and Section 55 of the MPRD Regulations (GNR 527 of 2004):

1. Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme (Ref: (MP) 30/5/1/2/2/ (124) MR approved 08 September 2015.

2.5. ASSUMPTIONS AND LIMITATIONS

The scope of the performance assessment is to determine the level of Goedehoop South Colliery's compliance with the conditions of the EA and EMPs listed in Sections 2.3 and 2.4. above and the effectiveness of the mitigation measures provided in the EMPr to manage the environmental impacts associated with the authorised activities.

The following assumptions and/ or limitations are applicable to the assessment and findings:

- This performance assessment is a snap-shot representation of the current activities at Goedehoop South Colliery.

- The assessment period is from August 2024 - July 2025. Conditions which refer to activities occurring prior to this assessment period are assumed to have been previously assessed and will thus not be assessed. Such conditions are determined to be “Not Applicable”.
- Due to the nature and extent of the operation, not all areas may be visited during the site inspection.
- Goedehoop South Colliery representatives may be called upon to provide information relating to specific activities within their respective areas.
- Goedehoop South Colliery is no longer operational and is rehabilitation and closure. Where current activities relate to construction, operation, decommissioning or closure, these may be deemed as not applicable.
- Procedures developed by Goedehoop South Colliery specifically, are deemed to be appropriately implemented by site personnel as part of the Integrated Management System.
- Outdated/ repealed legislation or referenced guideline documents will be substituted for with current/ relevant legislation and referenced guideline documents.

3. PERFORMANCE ASSESSMENT DETAILS

3.1. AUDIT TEAM

NTC Group (Pty) Ltd was established in 2005 and is 100% female, black owned with a Level 1 Broad Based Black Economic Empowerment Rating. We undertake our services with professional integrity and have built good reputations with stakeholders in the environmental management field, including regulatory authorities and government departments. We undertake our services in accordance the requirements of South African legislation, as well as acceptable international best practices.

The details of the specific environmental team that participated in the performance assessment at Goedehoop South Colliery are provided in Table 1. The declaration of the auditor's independence is attached in Appendix A and the Curriculum Vitae for the auditors are attached in Appendix B.

Table 1: Details of the Audit Team

ROLE	RESPONSIBLE PERSON	CONTACT DETAILS
LEAD AUDITOR	Teboho Motinyane holds an MSc in Environmental Science and has over 20 years of experience as an Environmental Manager in the coal mining sector. He is a member of the South African Council for Natural Scientific Professions and is a certified ISO 14001 EMS auditor. Throughout his career, Teboho has successfully led and managed a wide range of environmental and land management projects in the coal mining sector. Teboho was responsible for conducting the site inspection and reviewing the audit report.	Tel: +27 11 568 4701
		Fax: +27 86 665 1864
		Email: teboho@ntcgroup.co.za
LEAD AUDITOR	Raisibe Mabiza (Pr.Sci.Nat) is an Environmental Scientist contracted to NTC Group (Pty) Ltd. She has over 10 years' experience in the Environmental field inclusive of experience in the mining sector. Raisibe was responsible for conducting the site inspection, compiling the audit report and reviewing the supporting documentation.	Tel: +27 11 568 4701
		Fax: +27 86 665 1864
		Email: raisibe@ntcgroup.co.za

3.2. PERFORMANCE ASSESSMENT METHODOLOGY

3.2.1. Information Collation and Review

NTC Group (Pty) Ltd reviewed the conditions of the EA and EMPs listed in Sections 2.3 and 2.4. issued to Goedehoop South Colliery and compiled a Request for Information (RFI) document which provided a list of documents and records required from Goedehoop South Colliery to verify compliance with the conditions of the EA and EMP. The RFI was submitted to Goedehoop South Colliery and the requested information was availed to the auditors. The list of documents reviewed during the performance assessment are provided in Section 9. References.

Checklists were created verbatim of the conditions of Goedehoop South Colliery's EAs and EMPs and used to assess compliance. The numbering in performance assessment checklists corresponds with the conditions of the EAs and EMPs as far as possible, to allow for ease of reference.

3.2.2. Site Verification

A site assessment was conducted on 25 - 29 August 2025 and was attended Raisibe Mabiza (NTC), Teboho Motinyane (NTC), Tanja Bekker (NTC), Ziphelele Mthethwa (Goedehoop Colliery), Eva Seko (Goedehoop Colliery) and Caroline Perpermans (Pinsent Masons). During the site inspection, Goedehoop South Colliery's personnel were interviewed and the facilities/ areas were inspected.

3.2.3. Assessment Methodology

NTC Group (Pty) Ltd assessed each condition of Goedehoop South Colliery's EAs and the EMPs in terms of the criteria provided in Table 2. The audit approach was guided by the requirements of the ISO 19011:2018 Guidelines for Auditing Management Systems.

Table 2: Assessment Criteria

CRITERIA	ACC	DESCRIPTION
COMPLIANT	C	Full Compliance is when the current construction, operational, or decommissioning activities comply with the authorisation conditions. Mitigation measures or commitment thereof have been achieved and evidence is provided in the form of a document or condition implementation onsite. No mitigation measures are required where operations comply.
NON-COMPLIANT	N/C	Non-Compliance is when construction, operational, or decommissioning activities are in contravention of the conditions and/or have the potential to impact the environment in a detrimental manner. Non-compliance may also be associated with activities breaching legislation/ Mitigation measures or commitment thereof have not been achieved and evidence is not provided in the form of a document or condition implementation onsite. Non-Compliance findings have a high priority and mitigation measures are mandatory
NOT APPLICABLE	N/A	Not Applicable is assigned to authorisation/ permit conditions where activities no longer occur, that do not apply to current activities, that may be incorrect and require amendment, fall outside the audit period and/or are duplicates of existing conditions.
TAKE NOTE	T/N	In certain instances, conditions are presented in a manner which cannot be assessed as a Compliant or Non-Compliant Condition. This is a specific requirement which the Competent Authority may stipulate, which is applicable to the site and should be considered in the near future, or which allows the Competent Authority certain allowances.

3.3. PERFORMANCE ASSESSMENT SCOPE

The scope of the information and audit boundaries that were considered when conducting the performance assessment included:

- The requirements of Section 34 and Appendix 7 of the EIA Regulations (GN R982 of 2014), as amended.
- Regulation 55 of the MPRD Regulations (GNR 527 of 2004), as amended.
- Goedehoop South Colliery's EAs (refer to Section 2.3.) and EMPs (refer to Section 2.4.) that remained valid for the audit period.
- The scope of the assessment period between August 2024 – July 2025.
- The property boundaries of the Goedehoop South Colliery as shown in Figure 1.

4. PERFORMANCE ASSESSMENT RESULTS

This section provides results of performance assessment to verify compliance with the conditions of Goedehoop South Colliery's EAs and EMPs. The performance assessment results are presented in the checklists described in Section 3.2.1 which tabulates the conditions of the EAs and EMPs. Each condition was assessed and assigned a finding as per the assessment criteria shown in Table 2.

The checklists used to assess compliance with the EAs and EMPs are provided in Tables 3:

TABLE 3.	Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme (Ref: (MP) 30/5/1/2/2/ (122) MR approved 08 September 2015.
-----------------	---

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
-----	-----------	--------	----------------------------------

TABLE 3. GOEDEHOOP COLLIERY BULTFONTEIN EXTENSION ALIGNED ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME (DMRE REF: (MP) 30/5/1/2/2/ (124) MR APPROVED 08 SEPTEMBER 2015)

OPERATIONAL PHASE			
6.2.1	Geology		
	No measures can be implemented to manage the impact associated with the removal of the coal seams.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.2.2	Topography		
6.2.2.1	In the event that surface subsidence occurs on dry land areas, the following actions will be undertaken: - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. - The removed topsoil will be replaced over the area (minimum thickness = 300 mm).	T/N	No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.
6.2.2.2	Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated: - The fractures will be excavated to a minimum depth of 1.6 m (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). - The areas will be finally shaped, covered and seeded to conform to surface surroundings using a minimum 300mm layer of topsoil.	T/N	No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.
6.2.3	Soil		

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
6.2.3.1	<p>In the event that surface subsidence occurs on dry land areas, the following actions will be undertaken:</p> <ul style="list-style-type: none"> - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. - The removed topsoil will be replaced over the area (minimum thickness = 300 mm). 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.3.2	<p>Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated:</p> <ul style="list-style-type: none"> - The fractures will be excavated to a minimum depth of 1.6 m (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). - The areas will be finally shaped, covered and seeded to conform to surface surroundings using a minimum 300mm layer of topsoil. 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.4	Land Capability		
6.2.4.1	<p>In the event that surface subsidence occurs on dry land areas, the following actions will be undertaken:</p> <ul style="list-style-type: none"> - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. - The removed topsoil will be replaced over the area (minimum thickness = 300 mm). 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
6.2.4.2	<p>Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated:</p> <ul style="list-style-type: none"> - The fractures will be excavated to a minimum depth of 1.6 m (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). - The areas will be finally shaped, covered and seeded to conform to surface surroundings using a minimum 300mm layer of topsoil. 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.5	Land Use		
6.2.5.1	<p>In the event that surface subsidence occurs on dry land areas, the following actions will be undertaken:- Topsoil will be stripped to a minimum depth of 300 mm over the affected area.- The affected area will be shaped to be free draining.- The removed topsoil will be replaced over the area (minimum thickness = 300 mm).</p>	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.5.2	<p>Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated:</p> <ul style="list-style-type: none"> - The fractures will be excavated to a minimum depth of 1.6 m (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). - The areas will be finally shaped, covered and seeded to conform to surface surroundings using a minimum 300mm layer of topsoil. 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.6	Natural Vegetation		

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
6.2.6.1	<p>In the event that surface subsidence occurs on dry land areas, the following actions will be undertaken:</p> <ul style="list-style-type: none"> - Topsoil will be stripped to a minimum depth of 300 mm over the affected area. - The affected area will be shaped to be free draining. - The removed topsoil will be replaced over the area (minimum thickness = 300 mm). 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.6.2	<p>Ensure that fractures on subsided area and after settlement of rehabilitated areas are properly rehabilitated:</p> <ul style="list-style-type: none"> - The fractures will be excavated to a minimum depth of 1.6 m (stockpiling the upper 300mm topsoil separately) - Fractures will be backfilled using 150mm compacted layers to a minimum thickness of 0.6 meters (compaction to be 93% MOD AASHTO). - The areas will be finally shaped, covered and seeded to conform to surface surroundings using a minimum 300mm layer of topsoil. 	T/N	<p>No sinkholes or subsidence were observed during the site inspection. However, in the event that an area exhibits signs of subsidence, the area is fenced off to prevent access. The mine will review the relevant mine plans to determine if the area of subsidence corresponds with previously rehabilitated shafts or old underground workings. Should the area correspond with old shafts, the shaft will be opened, backfilled, levelled and reshaped. Should the area correspond with underground mining the areas will be fenced off to prevent access, signage will be erected to indicating safety risks; the extent of subsidence areas will be evaluated annually during a fly over to determine whether the subsidence has stabilised. Once the area is stabilised it will be backfilled, levelled and rehabilitated.</p>
6.2.7	Animal Life		
	<p>Note that due to the previous grazing, crop production and mining land use, no significant animal populations occur on the Goedehoop Colliery Bultfontein Extension, thus no significant impacts were predicted. No mitigation measures will be undertaken during the operational phase.</p>	T/N	<p>The condition is noted and accepted by Goedehoop Colliery. No requirements apply.</p>
6.2.8	Surface Water		
	<p>The actions described in section 6.2. 2 and 6.2.3 will ensure that the impacts that may occur on the surface water regime are minimised and or prevented.</p>	T/N	<p>Refer to Conditions 6.2.2 and 6.2.3 above.</p>
6.2.9	Groundwater		

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
6.2.9.1	Underground: Mined out sections will be sealed off as soon as the sections is abandoned. The above will ensure that the areas are devoid of free oxygen hence reducing the ability of the pyrite to oxidize thus forming acid mine drainage.	N/A	The condition falls outside the scope of the audit period (August 2024 - July 2025).
6.2.9.2	Monitor ground and surface water around the affected areas to determine if there if any plume and if so, far how fast, far and the direction of the migration of the plume. This will further determine if decant is taking place.	C	The pollution plume and location of monitoring boreholes was availed in the "Goedehoop Colliery - Update of the Geohydrological Model" (October 2024), compiled by Delta H Water Systems Modelling.
6.2.10	Air Quality		
	No impact is predicted or will occur on the ambient air quality due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.2.11	Sensitive Landscape		
	No impact is predicted or will occur on the ambient air quality due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.2.12	Noise Vibration		
	No impact is predicted or will occur due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.2.13	Visual Aspect		
	No impact is predicted due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.2.14	Socio-Economic Impacts		
6.2.14.1	Goedehoop Colliery has a positive impact on the region's economic welfare, due to the creation of employment and need for supporting industries. No management is necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.2.14.2	Goedehoop Colliery is actively involved in community development projects including the development of small-scale farming by providing landlords (on property owned by Anglo Operations Limited).	T/N	Goedehoop's community development projects includes the reshaping of the Vlakraagte mini pit to be free draining and topsoiled. The area was subsequently leased to a farmer that conducted seeding and maintenance. Additionally, quarterly groundwater monitoring is ongoing in accordance with the requirements of the authorised WUL.
6.2.15	Interested and Affected Parties		

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
6.2.15.1	Goedehoop Colliery will ensure genial relationships with Interested and Affected parties by: a) Recording all complaints received in complaints register, to be kept at the mine.	T/N	No complaints were recorded for the audit period August 2024 - July 2025). A complaints register is kept and maintained by Goedehoop Colliery.
6.2.15.2	b) Interested and affected party meetings will be held on a six-monthly basis. An attendance registers and minutes of the meetings will be taken.	C	Goedehoop Colliery reported that Social Development Department coordinates community forums to engage Interested and Affected Parties. Records of the meetings including attendance registers and minutes are maintained.
6.2.15.3	c) Keeping and making available all minutes of any meetings between Goedehoop Colliery and Interested and Affected parties.	C	Condition above refers.
6.2.15.4	d) Keeping an up-to-date list of I&AP's.	C	Goedehoop Colliery reported that Social Development Department maintains the list of current Interested and Affected Parties.
6.2.16	Historical and Cultural Aspects		
	No impact is predicted or will occur on cultural aspects due to the underground mining on the Bultfontein extension area; as a result, no actions are necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
DECOMMISSIONING AND CLOSURE			
6.3.1	Environmental, Social and Cultural Impact Assessment		
	Impacts of all aspects identified during the operational phase will continue during the decommissioning phase, hence all mitigation and environmental management programmes planned for the operational phase will be continued throughout the decommissioning phase. No significant additional impacts are predicted to occur during the decommissioning phase. No additional mitigation measures will be necessary.	T/N	The condition is noted and accepted by Goedehoop Colliery. No requirements apply.
6.3.2	Ongoing Seepage Control		

NO.	CONDITION	STATUS	FINDING/ OBSERVATION DESCRIPTION
	<p>The flow in the coal seam will be directed towards the underground mining area during this stage of mining and pumped to the surface. The exposed coal will thus not be flooded, and very little groundwater pollution is expected. Some groundwater pollution might take place during this stage if smaller abandoned mining areas are allowed to flood. However, with the main flow directed towards the mining area, the effect of such pollution is expected to be small. As the elevation of the river is above the coal seam, there is little chance that decanting will occur from the underground workings during mining.</p>	T/N	<p>No decanting from the underground workings was recorded for the audit period August 2024 - July 2025).</p>
6.3.3	Long Term Stability		
	<p>The use of a proper safety factors for the remaining pillars will ensure that the overlying strata maintain a long-term stability. No surface subsidence is therefore expected, and the area will remain free draining.</p>	T/N	<p>The "Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme"(November 2012), compiled by Geovicon cc, was availed during the audit and states that approximately 70% of the coal within the Bultfontein extension area will be mined and the remainder will be used as pillars to ensure that the overlying strata remain intact.</p>
6.3.4	Final Land Use		
	<p>To manage the effects of the mining activity on the environment using the principle of BAT such that, on attaining closure, the mining area will have been restored to a condition which approximates pre-mining conditions or such that it is suitable or safe for agricultural and or wilderness use.</p>	N/A	<p>The condition falls outside the scope of the audit period (August 2024 - July 2025).</p>

5. SUMMARY OF THE AUDIT FINDINGS

5.1. NON-COMPLIANCES

Based on the assessment undertaken during the reporting period, no non-compliances were identified in relation to Goedehoop South Colliery's Bultfontein Extension compliance with the conditions of the applicable Environmental Authorisations (EAs) and Environmental Management Programmes (EMPrs), as evaluated in Section 4 of this report. This outcome indicates that the Bultfontein Extension has effectively implemented and maintained the required environmental management controls and monitoring measures, demonstrating a satisfactory level of compliance with regulatory requirements and sound environmental governance practices during the audit period.

5.2. ACTIONS TO ADDRESS THE NON-COMPLIANCES

No action/s needed.

5.3. RECOMMENDATIONS TO AMMEND CERTAIN CONDITION

In accordance with Regulation 34(4) of the Environmental Impact Assessment Regulations (GN R984 of 2014), no recommendations are proposed to amend the conditions of the approved Environmental Management Programme.

6. CONTINUAL IMPROVEMENT

The absence of non-compliances at Goedehoop South Colliery's Bultfontein Extension reflects the effective implementation of environmental management controls and monitoring measures.

7. CONCLUSION

Based on the assessment undertaken during the reporting period, no non-compliances were identified in relation to Goedehoop South Colliery's Bultfontein Extension with respect to compliance with the conditions of the applicable Environmental Authorisations (EAs) and Environmental Management Programmes (EMPrs), as evaluated in Section 4 of this report. The audit findings confirm that the Bultfontein Extension has effectively implemented and consistently maintained appropriate environmental management controls and monitoring measures. Overall, the results indicate a satisfactory level of compliance with statutory and regulatory requirements and demonstrate sound environmental governance and responsible environmental management practices throughout the audit period.

8. REFERENCES

- Goedehoop Colliery Bultfontein Extension Aligned Environmental Impact Assessment and Environmental Management Programme (Ref: (MP) 30/5/1/2/2/ (122) MR approved 08 September 2015.

APPENDIX A
AUDITOR DECLARATION

ENVIRONMENTAL PRACTITIONER'S DECLARATION:

I, RAISIBE MABIZA, DECLARE THAT –

- I act as an Independent Environmental Practitioner conducting the Environmental Performance Assessment.
- I will perform the work relating to the Performance Assessment in an objective manner, even if this results in views and findings that are not favourable to the auditee.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting Environmental Performance Assessments and Environmental Compliance Audits, including knowledge of the National Environmental Management Act (NEMA) (Act 107 of 1998), the Mineral and Petroleum Resources Development Act (MPRDA) (Act 28 of 2002), the Environmental Impact Assessment (EIA) Regulations (GN R982 of 2014), as amended, and legal and other requirements that may have relevance to the proposed activity.
- I will comply with the NEMA (Act 107 of 1998), the MPRDA (Act 28 of 2002), the EIA Regulations (GN R982 of 2014), and all applicable legal and other requirements.
- I have not and will not engage in conflicting interests in the undertaking of the activity.
- I will provide the Competent Authority with access to all information at my disposal regarding the Performance Assessment, whether such information is favourable to the auditee or not.
- I will perform all other obligations as expected from an Environmental Practitioner in terms of the NEMA (Act 107 of 1998) and EIA Regulations (GN R982 of 2014).
- I realise that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations (GN R982 of 2014), as amended, and is punishable in terms of Section 24F of the NEMA (Act 107 of 1998).

DISCLOSURE OF VESTED INTEREST –

I do not have and will not have any vested interest (either business, financial, personal or other) in any activity other than remuneration for work performed in conducting an Environmental Performance Assessment in terms of the EIA Regulations (GN R982 of 2014), as amended.

SIGNATURE: _____

COMPANY: NTC GROUP (PTY) LTD
DATE: 15 DECEMBER 2025

ENVIRONMENTAL PRACTITIONER'S DECLARATION:

I, **TEBOHO MOTINYANE**, **DECLARE THAT –**

- I act as an Independent Environmental Practitioner conducting the Environmental Performance Assessment.
- I will perform the work relating to the Performance Assessment in an objective manner, even if this results in views and findings that are not favourable to the auditee.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting Environmental Performance Assessments and Environmental Compliance Audits, including knowledge of the National Environmental Management Act (NEMA) (Act 107 of 1998), the Mineral and Petroleum Resources Development Act (MPRDA) (Act 28 of 2002), the Environmental Impact Assessment (EIA) Regulations (GN R982 of 2014), as amended, and legal and other requirements that may have relevance to the proposed activity.
- I will comply with the NEMA (Act 107 of 1998), the MPRDA (Act 28 of 2002), the EIA Regulations (GN R982 of 2014), and all applicable legal and other requirements.
- I have not and will not engage in conflicting interests in the undertaking of the activity.
- I will provide the Competent Authority with access to all information at my disposal regarding the Performance Assessment, whether such information is favourable to the auditee or not.
- I will perform all other obligations as expected from an Environmental Practitioner in terms of the NEMA (Act 107 of 1998) and EIA Regulations (GN R982 of 2014).
- I realise that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations (GN R982 of 2014), as amended, and is punishable in terms of Section 24F of the NEMA (Act 107 of 1998).

DISCLOSURE OF VESTED INTEREST –

I do not have and will not have any vested interest (either business, financial, personal or other) in any activity other than remuneration for work performed in conducting an Environmental Performance Assessment in terms of the EIA Regulations (GN R982 of 2014), as amended.

SIGNATURE:



COMPANY: NTC GROUP (PTY) LTD
DATE: 15 DECEMBER 2025

APPENDIX B
AUDITOR CURRICULUM VITAE



TEBOHO MOTINYANE

Company: NTC Group (Pty) Ltd
SACNASP: (126871) , IAIA-SA
Mobile: +27 (0) 82 459-6874
Email: teboho@ntcgroup.co.za

BRIEF PROFILE

Teboho has extensive training and experience in environmental science and land management disciplines with Mining Industry (Arnot Opco, Exxaro Resources, Sasol Mining, BHP Billiton Energy Coal South Africa and Universal Coal) of about 20 years. Prior to joining the Mining Industry, Teboho has more than 5 years with the then Department of Minerals and Energy (now DMRE). He holds an MSc in Environmental Science and BSc. Hons from Rhodes University (Makanda). He is also a member of the South African Council of Natural Scientific Profession (licensed in South Africa) and is a certified ISO14001 EMS auditor. Teboho has been responsible for leading and managing numerous and varied environmental and land management projects for over 15 years.

PROFESSIONAL QUALIFICATIONS

2002: MSc (Environmental Science) - Rhodes University

1999: B.Sc. Hons. Environmental Science - Rhodes University

1994: B.Sc. Physics and Physical Geography NUL

PROFESSIONAL AFFILIATIONS

SACNASP(126871)

IAIA-SA

PROJECT EXPERIENCE

- March 2025 – Present: **Principal Consultant**, Sandton, Johannesburg, South Africa).
- June 2020 – February 2025: **Environmental and Land Manager (Arnot Opco Mine**, Rietkul Middelburg, South Africa).
- June 2018 – May 2020: **Environmental Manager (Universal Coal New Clydesdale Colliery**, Kriel, South Africa).
- March 2017 – May 2018: **Environmental Specialist (Exxaro Arnot Mine**, Rietkul, South Africa).
- March 2016 – February 2017: **Environmental Practitioner (Sasol Mining – Brandspruit and Impumelelo Collieries**, Secunda, South Africa).
- August 2015 – February 2016: **Environmental Consultant (Commonground Environmental Consulting**, Middelburg, South Africa).



NTC Group

RAISIBE MABIZA

Company: NTC Group (Pty) Ltd

Environmental Consultant

Mobile: +27 72 679 3782

Email: raisibe@ntcgroup.co.za

BRIEF PROFILE

Raisibe Mabiza holds a BSc Honours in Environmental Management and has over ten (10) years' industry experience as an Environmental Scientist. Her experience includes environmental compliance auditing of Environmental Authorisations (EAs), Environmental Management Programmes (EMPrs), Atmospheric Emission Licences (AELs), Water Use Licences (WULs), Waste Management Licences (WMLs), as well as environmental permitting (Environmental Impact Assessment (EIA), AEL, WUL, WML) and Environmental Control Officer (ECO). She has undertaken compliance auditing, environmental permitting and on-site compliance monitoring in the mining sector. She has been involved in projects from inception to closure as both a Project Assistant and Project Manager.

PROFESSIONAL REGISTRATIONS

SACNASP Professional Natural Scientist (123746)

PROFESSIONAL QUALIFICATION

2019: Bachelor of Science Honours in Environmental Management

2014: Bachelor of Science in Environmental Management & Geology

PROJECT EXPERIENCE

Raisibe has been involved in several projects as outlined below:

- Environmental Authorisation and licence compliance auditing
- Basic Assessment Reports
- Scoping and EIA
- Environmental Control Officer
- Environmental Management Programme reports
- Stakeholder Management
- Water Use License Applications
- Integrated Waste Management Plans
- Prospecting right applications
- Mining permit and mining right applications
- Assist with S24G application process