Prepared for:

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LETTER FOR EXEMPTION FOR A PHASE I HERITAGE IMPACT ASSESSMENT STUDY FOR THE BASIC ASSESSMENT, ENVIRONMENTAL MANAGEMENT PROGRAMME AND CLOSURE PLAN FOR THE CLOSURE OF THE INKOSI GREATER PROSPECTING RIGHT ON HARTEBEESTPOORT B 410 JQ NEAR BRITS IN THE NORTH WEST

Prepared by:

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March 2020

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1 DETAILS OF THE SPECIALIST

Profession: Archaeologist, Museologist (Museum Scientists), Lecturer, Heritage Guide Trainer and Heritage Consultant

Qualifications:

BA (Archaeology, Anthropology and Psychology) (UP, 1976)

BA (Hons) Archaeology (distinction) (UP, 1979)

MA Archaeology (distinction) (UP, 1985)

D Phil Archaeology (UP, 1989)

Post Graduate Diploma in Museology (Museum Sciences) (UP, 1981)

Work experience:

Museum curator and archaeologist for the Rustenburg and Phalaborwa Town Councils (1980-1984)

Head of the Department of Archaeology, National Cultural History Museum in Pretoria (1988-1989)

Lecturer and Senior lecturer Department of Anthropology and Archaeology, University of Pretoria (1990-2003)

Independent Archaeologist and Heritage Consultant (2003-)

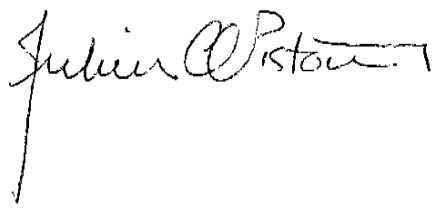
Accreditation: Member of the Association for Southern African Professional Archaeologists. (ASAPA)

Summary: Julius Pistorius is a qualified archaeologist and heritage specialist with extensive experience as a university lecturer, museum scientist, researcher and heritage consultant. His research focussed on the Late Iron Age Tswana and Lowveld-Sotho (particularly the Bamalatji of Phalaborwa). He has published a book on early Tswana settlement in the North-West Province and has completed an unpublished manuscript on the rise of Bamalatji metal workings spheres in Phalaborwa during the last 1 200 years. He has excavated more than twenty LIA settlements in North-West and twelve IA settlements in the Lowveld and has mapped hundreds of stone walled sites in the North-West. He has written a guide for Eskom's field personnel on heritage management. He has published twenty scientific papers in academic journals and several popular articles on archaeology and heritage matters. He collaborated with environmental companies in compiling State of the Environmental Reports for Ekhurhuleni, Hartebeestpoort and heritage management plans for the Magaliesberg and Waterberg. Since acting as an independent consultant he has done approximately 800 large to small heritage impact assessment reports. He has a longstanding working relationship with Eskom, Rio Tinto (PMC), Rio Tinto (EXP), Impala Platinum, Angloplats (Rustenburg), Lonmin, Sasol, PMC, Foskor, Kudu and Kelgran Granite, Bafokeng Royal Resources, Pilanesberg Platinum Mine (PPM) etc. as well as with several environmental companies.

2 DECLARATION OF INDEPENDENCE

I, Dr Julius CC Pistorius declare the following:

- I act as an independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even, if this result in views and findings that are not favourable for the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialists report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the applications;
- I will comply with the Act, Regulations and other applicable legislation;
- I will consider, to the extent possible, the matters listed in Regulation 13;
- I understand to disclose to the applicant and the competent authority all material information in my possession
- All the particulars furnished by me in this form are true and correct that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority; and
- I realise that a false declaration is offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



1 March 2020

3 BACKGROUND

Inkosi Platinum (Pty) Ltd (previously Inkosi Mining (Pty) Ltd) (Inkosi) holds a prospecting right (DMR reference number (NW30/5/1/1/3/2/2/1/150 PR) for platinum group metals, chrome ore, gold, silver, copper and nickel on various portions of the farm Hartebeestpoort B 410 JQ. This prospecting right is referred to as the Inkosi Greater prospecting right. The prospecting area is approximately 7 km west of Brits within the Madibeng Local Municipality and Bojanala Platinum District Municipality in the North West Province (Figure 1).

Between 2005 and 2014, Inkosi undertook prospecting activities on the farm Hartebeestpoort B 410 JQ, during which time 38 approved exploration drill holes were drilled. During this time, two additional drill holes were drilled in the southern portion of the Inkosi Greater prospecting right, as part of the Pandora JV Project. The Pandora JV Area (which included these two drill sites) was later excluded from the Inkosi Greater prospecting right area through an amendment process. As such, these two drill sites are not considered further in this closure application.

After completion of the pre-feasibility work, the Inkosi Board made the decision not to apply for a mining right and commence with mining, as it was found that the project is not economically viable at the expected economic parameters (i.e. cost, funding, prices). Inkosi has decided to exit from this prospecting right and as such is undertaking a closure application process. The areas disturbed by the prospecting activities have been allowed to re-vegetate and would be used by landowners and land users as was done prior to the prospecting activities.

SLR Consulting (Africa) (Pty) Ltd (SLR), an independent firm of environmental assessment practitioners (EAP), has been appointed by Inkosi Platinum (Pty) Ltd to manage the environmental authorisation processes associated with the closure of the Inkosi Greater prospecting right.

4 STAKEHOLDER ENGAGEMENT

The stakeholder engagement process commenced *prior* to the submission of the Basic Assessment Report (BAR) and has continued throughout the environmental assessment process. As part of this process, commenting authorities and interested and affected parties (I&APs) were given the opportunity to review the background information document (BID) and now the BAR and submit questions and comments to the project team. All comments submitted to date by the commenting authorities and I&APs have been included and addressed in the BAR. Further comments arising during the review of the BAR will be handled in a similar manner.

5 AIMS OF THE REPORT

This brief report serves as motivation that earlier heritage surveys for the Inkosi Greater prospecting right area were undertaken and that all heritage sites encountered on Hartebeestpoort B 410 JQ were recorded and reported (Part 10, 'Bibliography relating to earlier heritage studies').

This brief report, therefore, serves as letter of exemption for a Phase I heritage survey for the BAR, Environmental Management Programme and Closure Plan compiled by SLR for the closure of prospecting activities on portions of this farm.

6 ASSUMPTIONS AND LIMITATIONS

It is possible that earlier heritage surveys done for the Inkosi Greater prospecting right area and for the farm Hartebeestpoort B 410 JQ may have missed heritage resources. Heritage sites may be covered with grass or vegetation whilst others may be located below the surface of the earth and may only be exposed once prospecting activities commence. It is also possible that heritage resources may simply have been missed as a result of human failure to detect them.

7 THE GREATER INKOSI PROSPECTING AREA

7.1 Description

A description of the Inkosi Greater prospecting right area on the farm Hartebeestpoort B 410 JQ is provided in Table 1.

Description	Details
Farm Name	Hartebeestpoort B 410 JQ
Closure application area (ha)	The Inkosi Greater prospecting right area covers an area of approximately 2 317 ha
Magisterial district	The prospecting right area is located within the Madibeng Local Municipality and in the Bojanala Platinum District Municipality.
Distance and direction from nearest town	The proposed project site is located approximately 7 km west of Brits (Refer to **Error! Reference source not found.**).
21-digit Surveyor General Code for each farm portion	T0JK00000000041001359 T0JK00000000041001186 T0JK00000000041001375 T0JK00000000041000606 T0JK00000000041001059 T0JK00000000041001376 T0JK00000000041000960 T0JK00000000041001143 T0JK00000000041001140 T0JK00000000041000962 T0JK00000000041001144 T0JK00000000041001112 T0JK00000000041000963 T0JK00000000041001149 T0JK00000000041001113 T0JK00000000041000971 T0JK00000000041001150 T0JK00000000041001117 T0JK00000000041000974 T0JK00000000041001154 T0JK00000000041001148 T0JK00000000041000975 T0JK00000000041001170 T0JK00000000041000969 T0JK00000000041001111 T0JK00000000041001107 T0JK00000000041000968 T0JK00000000041001114 T0JK00000000041001171 T0JK00000000041001141 T0JK00000000041001115 T0JK00000000041001159 T0JK00000000041001145 T0JK00000000041001116 T0JK00000000041001172 T0JK00000000041001146 T0JK00000000041001185 T0JK00000000041001160 T0JK00000000041001194 T0JK00000000041000607 T0JK00000000041001173 T0JK00000000041001177 T0JK00000000041000608 T0JK00000000041001199 T0JK00000000041001176 T0JK00000000041000972 T0JK00000000041001187 T0JK00000000041001174 T0JK00000000041000977 T0JK00000000041001184 T0JK00000000041001175 T0JK00000000041001142 T0JK00000000041001188 T0JK00000000041001169 T0JK00000000041000609 T0JK00000000041001189 T0JK00000000041001168 T0JK00000000041001153 T0JK00000000041001191 T0JK00000000041001167 T0JK00000000041000765 T0JK00000000041001192 T0JK00000000041001192 T0JK00000000041000882 T0JK00000000041001193 T0JK00000000041001345 T0JK00000000041001147 T0JK00000000041001195 T0JK00000000041001146 T0JK00000000041000961 T0JK00000000041001196 T0JK00000000041000970 T0JK00000000041000964 T0JK00000000041001197 T0JK00000000041000973 T0JK00000000041000965 T0JK00000000041001198 T0JK00000000041001132

Description	Details
	T0JK00000000041000976 T0JK00000000041001199 T0JK00000000041001139 T0JK00000000041001110 T0JK00000000041001200 T0JK00000000041001152 T0JK00000000041001177 T0JK00000000041001353 T0JK00000000041001377 T0JK00000000041000000
Co-ordinates (	A: 27°40'39.451"E 25°35'27.132"S B: 27°41'19.452"E 25°35'39.926"S C: 27°41'3.458"E 25°37'21.793"S D: 27°41'27.657"E 25°37'36.709"S E: 27°41'37.702"E 25°38'19.701"S F: 27°41'45.814"E 25°37'48.92"S G: 27°42'5.494"E 25°35'54.737"S H: 27°43'0.657"E 25°36'22.479"S I: 27°42'42.506"E 25°38'18.023"S J: 27°41'6.967"E 25°38'48.539"S K: 27°40'22.435"E 25°38'37.133"S L: 27°39'56.166"E 25°38'57.065"S M: 27°39'38.978"E 25°39'23.787"S N: 27°39'12.634"E 25°39'30.737"S O: 27°37'46.062"E 25°39'52.296"S P: 27°38'4.72"E 25°39'11.731"S Q: 27°38'46.893"E 25°38'57.543"S R: 27°39'51.744"E 25°37'42.664"S S: 27°39'41.677"E 25°36'9.754"S

Table 1- Description of the Inkosi Greater prospecting right area (above).

7.2 Location of the prospecting area

The regional location of the Inkosi Greater prospecting right area is indicated in Figure 1.

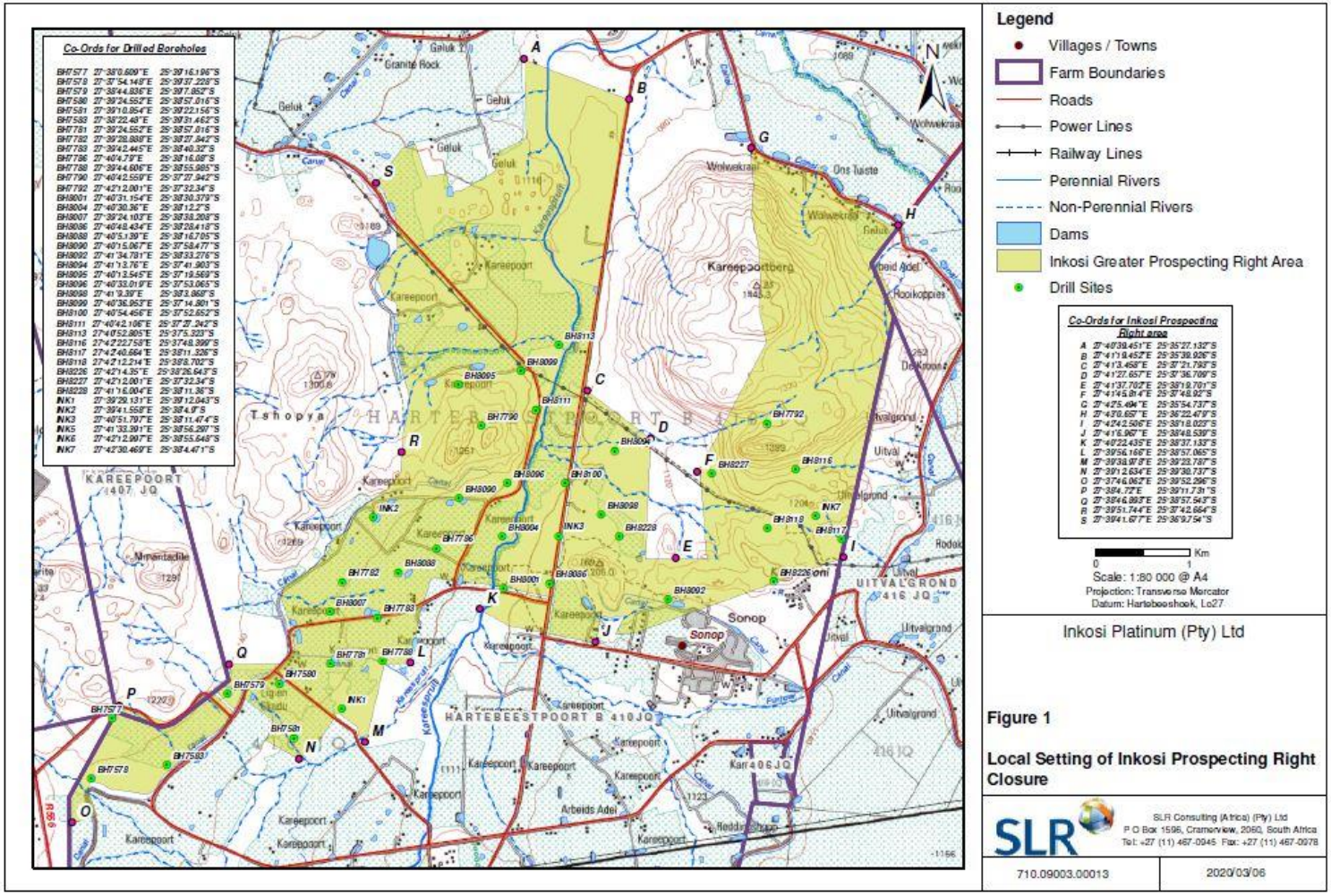


Figure 1- Regional location of the Inkosi Greater prospecting right area (above).

7.3 Prospecting activities

Prospecting activities undertaken between 2005 and 2014 included:

- Use of existing roads/ tracks (as far as possible);
- Establishment and use of new access tracks where prospecting related vehicles had to deviate from existing roads;
- Establishment of a small temporary drill camp;
- Drilling of 38 approved drill holes (BH7577, BH7578, BH7579, BH7580, BH7581, BH7583, BH7781, BH7782, BH7783, BH7786, BH7788, BH7790, BH7792, BH8001, BH8004, BH8007, BH8086, BH8088, BH8090, BH8092, BH8094, BH8095, BH8096, BH8098, BH8099, BH8100, BH8111, BH8113, BH8116, BH8117, BH8118, BH8226, BH8227, BH8228, INK1, INK2, INK3 and INK7) (see Figure 2); and
- Establishment and use of site equipment and support facilities (drill rigs, trucks, plastic lined drilling water containment facility (sump), water cart, core sample trays) and portable chemical toilets etc.

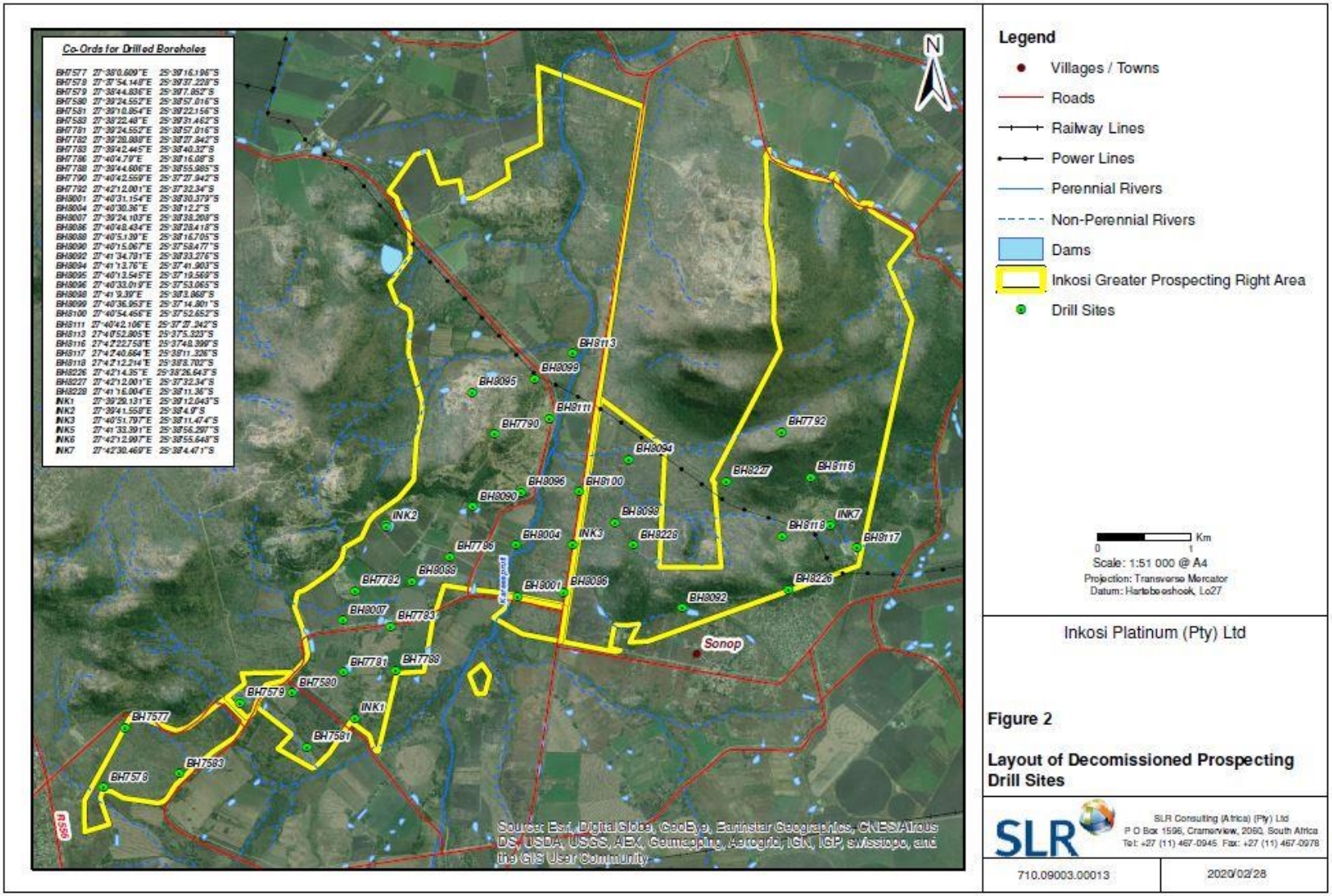


Figure 2- Prospecting drill sites in the Inkosi Greater prospecting area (above).

7.4 Decommissioning and rehabilitation of disturbed areas

Decommissioning and rehabilitation took place immediately after exploration work at each drill site was completed in line with the approved EMPr. This usually took between one and three days. Decommissioning and rehabilitation activities at each site included the following steps:

- Removal of all equipment, structures and materials;
- Removal of any waste and disposal at an appropriately permitted waste site;
- Sealing and capping of all drill holes and installation of a 0.8 x 0.8 x 0.8 m concrete block and standpipe for easy identification;
- Replacing and levelling topsoil (where removed);
- Scarifying/ripping areas were soils have been compacted; and
- Areas were left to naturally re-vegetate.

These steps were based on the regulatory requirements for rehabilitation of the prospecting sites as detailed in the approved EMPr. It should be noted that at the time of compiling the prospecting EMP, the DMRE's standard EMPr format was relevant.

7.5 Aftercare and maintenance

Typically, a period of aftercare and maintenance is applied to each rehabilitated drill site to ensure closure objectives are being met. Given the nature of the prospecting activities, a 2 to 3-year period of maintenance and aftercare is usually applied.

For the drill sites, the aftercare and maintenance activities included the monitoring of erosion and vegetation establishment and control and eradication of alien invasive plants.

7.6 A summary of progressive rehabilitation and current status of the disturbed areas

Progressive rehabilitation took place as prospecting activities advanced. Rehabilitation commenced as each drill site was completed and decommissioned. Rehabilitation activities were aligned with Inkosi's approved EMPr and closure objectives.

According to the 2014 and 2016 EMPr performance assessments, drill sites completed prior to 2013 were fully re-vegetated and no further maintenance or aftercare activities were deemed necessary. The re-establishment of vegetation at drill sites[1] (completed between 2013 and 2014) was still in progress and required maintenance and aftercare. Considering the uniformity of the baseline conditions within the prospecting right area, and given that the area experienced average rainfall since 2014 (which would have assisted with re-vegetation of the drill sites), it is therefore assumed that re-vegetation at these drill sites has been successful with no further maintenance or monitoring required. It is however possible that post-drilling third party land uses (such as livestock grazing) may have influenced the status of the vegetation at these drill sites, and this was noted during the Final EMPr Performance Assessment undertaken in support of this closure application.

A site verification undertaken at 4 drill sites[2] within the prospecting right area in January 2020, concluded that the vegetation had re-established to a satisfactory level and the pre-prospecting land use for these drill sites was achieved. It was not possible to verify the status of vegetation within the remaining 34 drill sites[3] at the time of the assessment. This was mainly due to difficulties in locating standpipes within the drill sites (these had been either stolen or destroyed as they conflict with current land uses such as crop cultivation, granite mining etc.). In some instances,

[1] Drill Site BH7792, BH8226, BH8227 and BH8228
[2] Drill Sites BH7577, BH7783, BH8007 and BH8099
[3] Drill Site BH7578, BH7579, BH7580, BH7581, BH7583, BH7781, BH7782, BH7786, BH7788, BH7790, BH7792, BH8001, BH8004, BH8086, BH8088, BH8090, BH8092, BH8094, BH8095, BH8096, BH8098, BH8100, BH8111, BH8113, BH8116, BH8117, BH8118, BH8226, BH8227, BH8228, INK1, INK2, INK3 and INK7) (drilled between 2005 and 2014)

drill sites could not be accessed as access tracks have successfully re-vegetated and are therefore already fully rehabilitated.

8 TYPES AND RANGES OF HERITAGE RESOURCES

Earlier heritage surveys for platinum and granite mining related projects as well as for the proposed Inkosi Greater Inkosi prospecting activities revealed the presence of the Stone walled sites from the Late Iron Age within the prospecting right area, namely, HAR (6-9, 14-22, 30) and Clusters (4-5, 11-13, 23-28) (Figure 3).

Stone walled sites occur in eco-zones such as mountainous and flat terrain ecological areas of the prospecting right area. This include sites located on higher ground in the Ga-Tshopje and Kareepoort Mountains as well as their foothills and here and there on flat turf veld in-between these mountains.

However, both these eco-zones have been severely affected during the past decades. Whilst the mountain ranges were largely destroyed as a result of granite mining activities the flat areas adjoining the mountains were utilized for intense irrigation purposes.

Although BH8166 occurs approximately 77m from HAR16 the two features are separated from one another by a low granite kopje. Whilst BH9226 is situated 81m from Cluster 25 it is located on low ground and the stone walls on a high plateau in the Ga Tshopje mountain range above the borehole. Both sites (stone walls) and boreholes therefore were located at safe distances from each other while also being separated by natural barriers between boreholes and stone walled sites.

It can be therefore be stated that the majority of stone walled sites in the mountain ranges within the prospecting right area have either been obliterated or severely damaged by granite mining whilst those that occurred on flat terrain now have disappeared as a result of prolonged agricultural activities (see Part 10, ‘Select Bibliography relating to earlier heritage studies’, particularly bolded reports) (Figure 3).

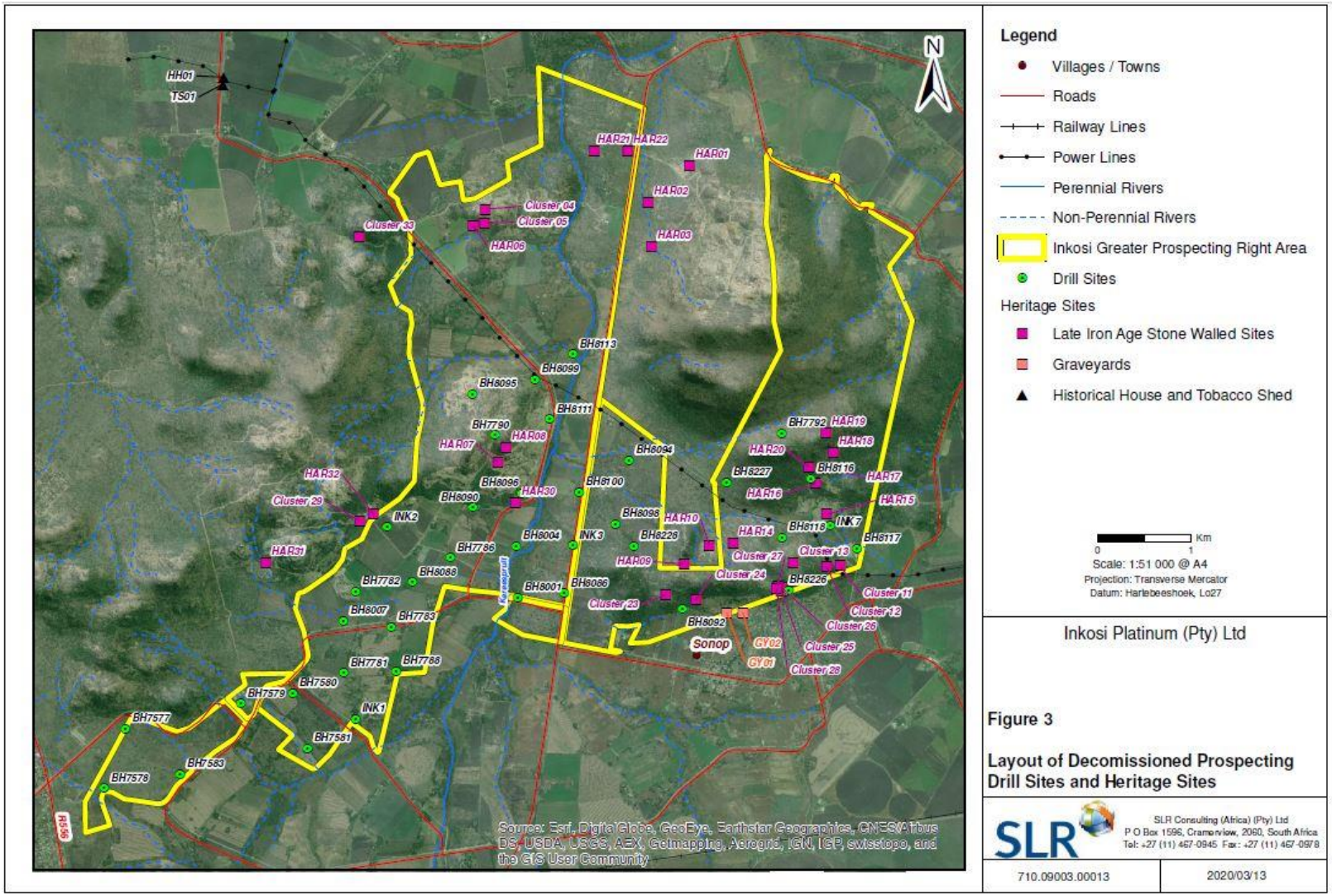
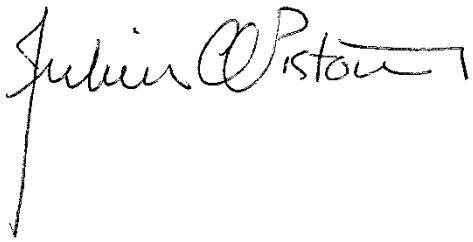


Figure 3- Prospecting drill holes and heritage sites in the Inkosi prospecting area (above).

9 CONCLUSION

It is evident from Figure 3 that none of the prospecting drill holes coincided with recorded heritage resources in the Inkosi Greater prospecting area. It is therefore understood that the Inkosi Greater prospecting activities did not impact on any of the heritage resources recorded in this area.

The closure of the prospecting right does not require any physical disturbance activities to take place on site. Consequently, no further disturbance will occur at the prospecting right areas for the closure of the prospecting right to take effect.



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10 BIBLIOGRAPHY RELATING TO EARLIER HERITAGE STUDIES

Pistorius, J.C.C. 2004. A Heritage Impact Assessment (HIA) study for Impala Platinum's proposed new No 16 Shaft Complex on the farm Reinkoyalskraal 278JQ in the Bojkone-Bothlaba District Municipality of the North-West Province. Unpublished report prepared for Ground Water Consulting Services CC.

Pistorius, J.C.C. 2005. Results on a Phase II Heritage Impact Assessment study. An investigation of a Late Iron Age site on the farm Reikoyalskraal 287JQ in the Bankeveld of North-West Province of South Africa. Unpublished report prepared for Ground Water Consulting Services CC.

Pistorius, J.C.C. 2006. A Phase I Heritage Impact Assessment (HIA) study for Impala Platinum's Exploration activities near Rustenburg in North-West Province of South Africa. Unpublished report Impala Platinum.

Pistorius, J.C.C. 2006. A Phase I Heritage Impact Assessment (HIA) study for the Impala Platinum Shaft 17 Complex on the farm Vlakfontein 276JQ near Rustenburg in the North-West Province of South Africa. Unpublished report for Golder Associates and for Impala Platinum.

Pistorius, J.C.C. 2006. A Phase 2 Heritage Impact Assessment (HIA) study for the Impala Platinum Shaft 17 Complex on the farm Vlakfontein 276JQ near Rustenburg in the North-West Province of South Africa. Unpublished report for SAHRA and for Impala Platinum.

Pistorius, J.C.C. 2007. Preliminary report on a heritage survey for the Ga-Nape Late Iron Age Complex on Welbekend 117 in the Rustenburg (Bafokeng) District in the North-West Province of South Africa. Unpublished report prepared for Royal Bafokeng Resources.

Pistorius, JCC 2008. A Phase I Heritage Impact Assessment for the Chaneng sewer treatment plant and sewer pipelines in the Rustenburg (Bafokeng) District in the

North-West Province of South Africa. Unpublished report prepared for Naledzi Environmental Consultants and the Royal Bafokeng Administration.

Pistorius, JCC 2008. Report on the results of monitoring heritage resources during a seismic survey for Impala Platinum on various farms in the Rustenburg (Bafokeng) District of North West. Unpublished report for Impala Platinum.

Pistorius, J.C.C. 2010. Report on a preliminary Heritage Survey for Impala Platinum's proposed new Shaft 18 complex on Toulon 111JQ and Roodekraalspruit 113JQ in the Rustenburg District of the North-West Province of South Africa. Unpublished report prepared for Impala Platinum Mine.

Pistorius, J.C.C. 2011. A survey and assessment of heritage resources and proposing the implementation of a cultural heritage management program in the Impala Platinum (Implats) mine lease area in the Rustenburg (Bafokeng) District in the North-West Province. Unpublished report prepared for Impala Platinum Mine.

Pistorius, J.C.C. 2011. A Phase I Heritage Impact Assessment (HIA) study for Impala Platinum Limited Rustenburg (Implats) proposed new Shaft 18 and Shaft 19 in the Rustenburg (Bafokeng) District in the North-West Province. *Unpublished report for Implats*.

Pistorius, J.C.C. 2012. A Phase I Heritage Impact Assessment (HIA) study for Aflease's proposed prospecting areas on the farm Hartbebeesport B 120JQ in the North West. *Unpublished report prepared for SLR Consulting (Africa) (Ltd)*.