



**Delivering
on our purpose**



TTECR

Tax Transparency and
Economic Contribution Report
For the year ended 30 June 2024



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How to navigate this report

For easy navigation and cross-referencing, we have included the following icons within this report:

-  Information available on our website www.implats.co.za
-  Information available elsewhere in this report

Follow us online at www.implats.co.za

- Direct access to all our reports available on release
- Our website has detailed investor, sustainability and business information.

 <https://X.com/Implats>

 <https://www.linkedin.com/company/impala-platinum/>

 https://www.youtube.com/channel/UCGshehA_JCYUeox7ICZw6bw/featured

 <https://www.facebook.com/implats/>

OUR 2024 REPORTING SUITE

Implats is committed to establishing and maintaining trust through high-quality and transparent reporting that is useful to a wide variety of stakeholders:



AIR

Annual integrated report

- Reports to providers of financial capital how Implats creates, preserves or erodes value over time.



AFS

Audited annual financial statements

- Financial statement assurance, including the audit and risk committee report and directors' report
- Consolidated financial statements
- Company financial statements.



CCR

Climate change report

- Climate change risks and adaptations, decarbonisation plans and adoption of renewable energy
- Prepared in accordance with the recommendations of the TCFD and the Johannesburg Stock Exchange (JSE) Climate Change Disclosure Guidance.



ESG

ESG report

- Detail on material economic, social and environmental performance and governance
- GRI G4 core compliance
- Internal reporting guidelines in line with the UN Global Compacts
- Independent assurance report.



MRMR

Mineral Resource and Mineral Reserve Statement

- Provides updated estimates and reconciliation of Mineral Resources and Mineral Reserves
- Conforms to the South African Code for Reporting of Exploration Results, Mineral Resources and Mineral Reserves (SAMREC Code) (2016)
- Conforms to section 12.13 of the JSE Listings Requirements
- Competent Persons sign-off
- Third-party assurance.



AGM

Notice to shareholders

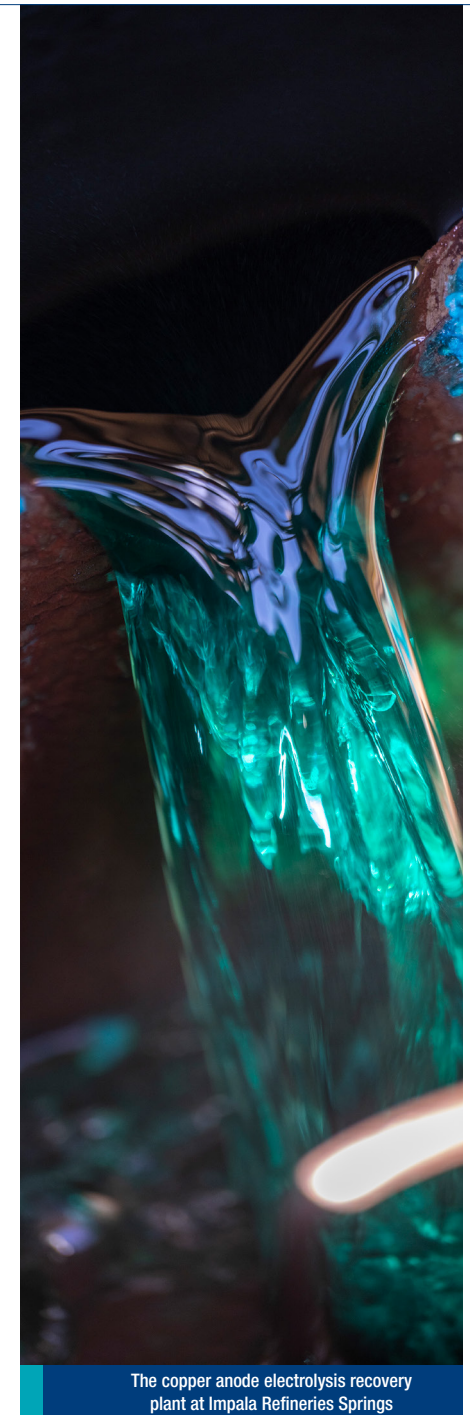
- Notice of annual general meeting
- Form of proxy.



REM

Remuneration report

- Background statement
- Remuneration philosophy and policy
- Implementation report.



The copper anode electrolysis recovery plant at Impala Refineries Springs

Welcome to our tax transparency and economic contribution report

Welcome to Impala Platinum Holdings Limited's second annual tax transparency and economic contribution report for the financial period ended 30 June 2024. This report is aimed at explaining the Group's approach to tax, including:

- Our tax policy and strategy
- Tax governance
- Tax risk management and control framework
- Tax compliance and how this links the business and our approach to sustainable development.

This report details the total tax and broader economic contribution in each of the countries in which Implats (the Company or the Group) operates, to advance transparency concerning the Group's tax practices, tax estimates and judgements, compliance with tax laws and Implats' code of ethics, and to ensure the Group achieves sustainable and socially responsible tax practices while contributing to the United Nations Sustainable Development Goals (UN SDGs).

Implats' reporting boundary, strategic risks and responses, operating context, governance and performance are captured throughout our entire reporting suite, which should be read together with this report to understand our tax drivers and our broader economic contributions.

The tax transparency and economic contribution report builds on the information in our annual financial statements, annual integrated report and the environmental, social and governance (ESG) report, available at www.implats.co.za.

FORWARD-LOOKING STATEMENTS

This report may contain certain forward-looking information such as projected capital expenditure, projected costs and savings related to tax incentives and levies, and the Group's view of the impact of current developments in the tax landscape, as well as future tax performance. Opinions expressed here are, by nature, subjective about known risks and uncertainties. Changing information or circumstances may cause Implats' actual results, plans and objectives to differ materially from those expressed or implied in the forward-looking statements. Undue reliance should not be placed on such opinions, forecasts or data. No representation is made as to the completeness or correctness of the opinions, forecasts or data contained herein. Neither Implats, nor any of its affiliates, advisers or representatives accepts any responsibility for any loss arising from the use of any opinion expressed or forecast, or the data herein.

Forward-looking statements apply only as of the date on which they are made, and Implats does not undertake any obligation to publicly update or revise any of its opinions or forward-looking statements in this report, whether to reflect new data or future events or circumstances. Any forward-looking information has not been audited, reviewed or otherwise reported on by the external auditors.

We welcome your feedback to ensure we cover all relevant aspects



Go to www.implats.co.za or email investor@implats.co.za to provide us with your feedback.



Receptionist Brenda Mmogorosi at Rustenburg Platinum Mines

Approval and basis of preparation

APPROVAL

The Implats board acknowledges its responsibility for the integrity of this report and has considered its content. The board believes the disclosures contained herein fairly and transparently present the Group's integrated tax and economic performance.

The audit and risk committee (ARC), which has oversight responsibility for this report, has applied its mind to the preparation and presentation of the Implats tax and economic contribution report, and has concluded that it is presented in accordance with the relevant reporting frameworks, and has recommended the report for approval by the board.

BASIS OF PREPARATION

Overall tax and economic transparency is achieved through the disclosures contained in our complete and integrated suite of reports. Detailed disclosures contained in other reports are not duplicated here. However, where appropriate, reference is made to the specific reports containing material aspects of tax and economic transparency disclosure.

Implats has developed a comprehensive ESG reporting framework linked to the UN SDGs to guide the development and integration of sustainability principles into its financial strategies and their alignment with corporate strategies (refer to the ESG framework and stakeholder engagement disclosures in the annual integrated report).

Our approach to transparency disclosure is guided by the Global Sustainability Standards Board (GSSB) Global Reporting Initiative's standard (GRI 207: Tax 2019) for country-by-country tax disclosures, the King IV Report on Corporate Governance™* for South Africa, 2016 (King IV), the International Financial Reporting Standards (IFRS), and the JSE Sustainability and Climate Disclosure Guidance.

* Copyright and trademarks are owned by the Institute of Directors in South Africa NPC and all its rights are reserved.

GRI 207

The GRI is the independent international organisation that sets the standards that represent global best practice for reporting publicly on a range of economic, environmental and social impacts. GRI 207 sets out disclosures related to tax and payments to governments aimed to promote greater transparency on an organisation's approach to taxes.

Key elements of GRI 207 comprise the following:

- o GRI 207-1: Approach to tax
- o GRI 207-2: Tax governance, control and risk management
- o GRI 207-3: Stakeholder engagement and management of concerns related to tax
- o GRI 207-4: Country-by-country Reporting.

The requirements of GRI 207-1 to 4 are addressed in this report.

Our tax policy (<https://www.implats.co.za/pdf/annual-reports/annual-integrated-report/2024/tax-economic-report-2024.pdf>) is aligned with our code of ethics.

As a predominantly South African-based company, Implats has its primary listing on the JSE Limited (JSE) and a secondary listing on A2X Markets in South Africa, as well as a level 1 American Depository Receipt programme in the United States of America. We align with the JSE Listings Requirements and the South African Companies Act, 71 of 2008, as amended.

South Africa is an outreach country of the Extractive Industries Transparency Initiative (EITI), and Implats is not currently a member of the International Council on Mining and Metals (ICMM). Nonetheless, the Group has applied certain disclosure principles and guidance relating to payments to governments and economic contributions to enhance transparency in this area.

Monetary amounts in this report are presented in South African rand, rounded to millions, unless otherwise stated.

Cash versus accruals

Unless otherwise stated, tax payments are included on a cash basis (refer to the reconciliation between the Group income taxes accrued and income taxes paid on [page 22](#)). Our total tax contribution is a measure of the cash contribution made to tax authorities in the year and may include tax payments relating to previous years.

Tax as a material topic – our double-materiality lens

Double materiality broadly refers to how the information we



disclose can be material both in relation to its implications for financial value (financial or inward materiality), as well as our impact on society, the environment and the economies we operate in (impact or outward materiality). Implats' approach to double materiality acknowledges that our impact on the world beyond financial considerations can be material and therefore should be disclosed, for reasons other than the effect on profit. This approach is aligned with the sustainability-related information reported in the Group integrated and ESG reports.

SCOPE AND REPORTING BOUNDARY

Implats' tax and economic contribution report details the taxes paid by the Group during the period 1 July 2023 to 30 June 2024.

The report includes an analysis of our total tax contribution in the three countries in which we have key business activities: South Africa, Zimbabwe and Canada. The Group also has a presence in Guernsey, Japan and the United Kingdom. Our tax policy and strategy are applicable to all taxes we pay and we therefore provide information on our total tax contribution, which includes corporate income taxes, payroll, indirect, property and environmental taxes, as well as other payments to governments (including royalties) as well as taxes collected on their behalf.

Payments to governments by our joint ventures (JVs) and associates are excluded from the Group's total tax contributions since these entities are equity accounted by the Group. Additionally, Implats neither operates nor makes payments on their behalf. The financial reporting boundary applied is consistent with the annual integrated report (refer to [page 5](#)).

Approval and basis of preparation continued

Assurance

Assurance of the information contained in this report forms part of the Group's overall internal control combined assurance map (CAM), as disclosed in our annual integrated report.

The tax numbers contained in this report have been extracted from (and where appropriate, reconciled to) the Implats consolidated annual financial statements for the year ended 30 June 2024. An unqualified audit opinion was expressed on the consolidated annual financial statements.

Additional financial information, aside from what is contained in the consolidated annual financial statements, was compiled from internally sourced information, which is supported by data management systems subject to robust internal controls to ensure accuracy and completeness. Under delegation from the board, the ARC monitors the Group's system of risk management and internal control.

Implats' Group internal audit function coordinates input from the various lines of defence into the CAM by collating assurance-related information related to the Group's strategic risks. CAM verification reviews are conducted per board committee, on a quarterly rotational basis, to provide assurance on the associated controls and to confirm that they are in place and operating as intended.

In line with King IV™, Implats' lines of assurance are depicted in the graphic on the right, and all role players are subject to the Group's code of ethics.

A Group-wide cross-functional team, led by the Group chief financial officer (CFO), and representing various subject matter experts in Group finance and tax, produced the content in this report. The process is governed by the Group ARC, which recommends the report for approval by the board.



Implats at a glance

ABOUT IMPLATS

Implats is a leading producer of platinum group metals (PGMs), structured around seven mining operations and Impala Refining Services (IRS), a refining business. The Group’s mining operations are located on the Bushveld Complex in South Africa, the Great Dyke in Zimbabwe and the Canadian Shield.

Further operational details are contained in our annual integrated report.

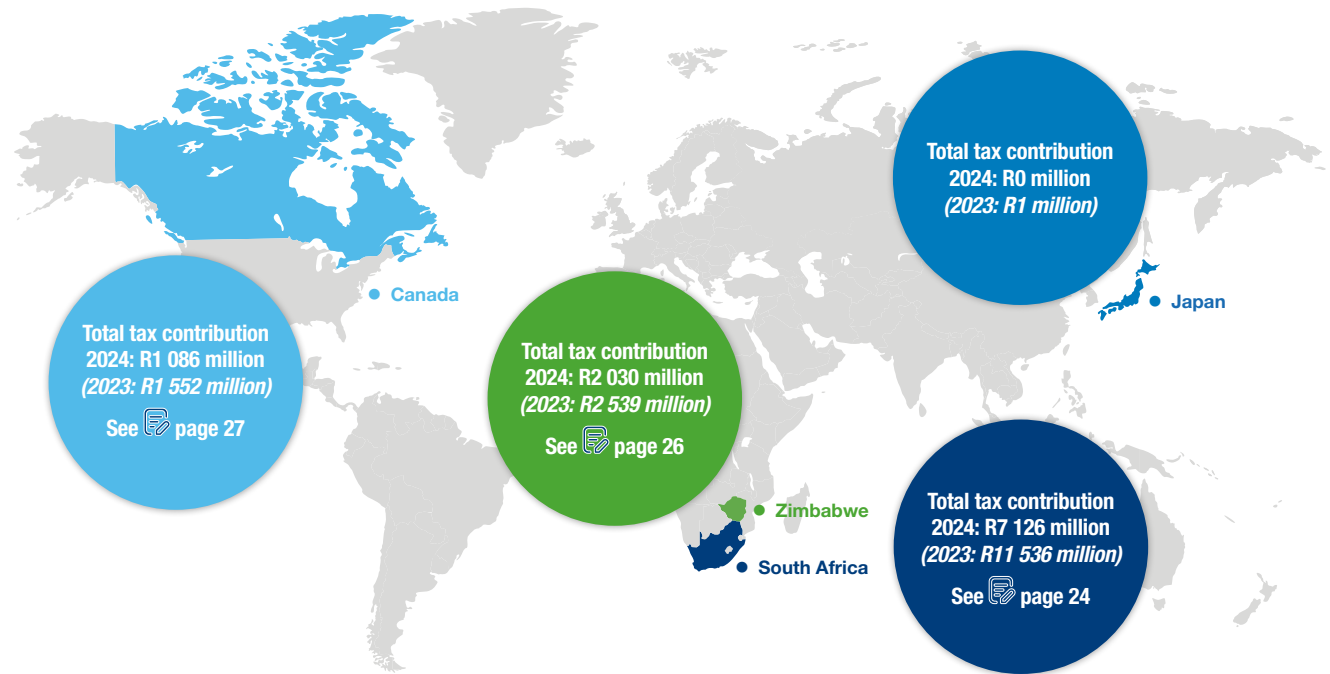
Contributing approximately 20% to global primary PGM production annually, our more than 66 000 people (employees and contractors at controlled operations) form the cornerstone of our business. Guided by our core values – respect, care and deliver – we cultivate a culture rooted in teamwork and accountability.

Implats holds total attributable PGM resources of 316.5 million ounces. Our products are exported to many sectors in diverse markets, including Japan, China, the US and Europe, where they are integral to industrial, medical and electronic applications, supporting a cleaner, greener world.

Implats’ primary listing is on the JSE in South Africa, and it has a secondary listing on South Africa’s A2X and maintains a level one American Depositary Receipt programme in the US.

More information about the uses for our metals is provided in our integrated and climate change reports. Our approach to the tax risks and the opportunities associated with climate change is explained in our tax operating landscape on [page 15](#).

Our operating framework allows each operation to establish and maintain close relationships with its stakeholders while operating within a Group-wide approach to managing the economic, social and environmental aspects of sustainability.



Purpose

Creating a better future

Vision

To be the most valued and responsible metals producer, creating a better future for our stakeholders

Values

Respect, care and deliver

Implats at a glance continued



Logging diamond coredrill samples at Two Rivers

FINANCIAL REPORTING BOUNDARY – GROUP STRUCTURE (AT 30 JUNE 2024)

Impala Platinum Holdings Limited – Material operations					
South Africa	87%	Impala Rustenburg	13%	Employee Share Ownership Trust (ESOT) 4% Community Ownership Trust (CSOT) 4% Bokamoso RF (Pty) Ltd ¹ 5%	
	87%	Impala Bafokeng	13%	IBR ESOT Company (Pty) Ltd 4% Community Ownership Trust (CSOT) 4% Bokamoso RF (Pty) Ltd ¹ 5%	
	73.2%	Marula	26.8%	Tubatse Platinum (Pty) Ltd 7.6% Mmakau Mining (Pty) Ltd 7.6% Marula Community Trust 7.6% Marula ESOT Company (Pty) Ltd 4%	
	46%	Two Rivers	54%	African Rainbow Minerals Ltd	
Zimbabwe	87%	Zimplats	13%	Various minorities	
	50%	Mimosa	50%	Sibanye-Stillwater	
Canada	100%	Lac des Iles	100%		

¹ Led by Siyanda Resources Proprietary Limited (Siyanda Resources).

Group tax and economic contribution¹

Group taxes	2024 Rm	Borne %	2023 Rm	Borne %
Corporate income taxes	1 238	100	6 012	100
Withholding taxes	152	18	407	18
Payroll taxes	6 054	6	5 263	4
Indirect taxes ²	1 307	26	1 334	23
Property taxes	120	100	91	100
Environmental taxes	110	100	74	100
Other payments to governments ³	8 981		13 181	
	1 261	100	2 447	100
Total tax contribution	10 242		15 628	
Group effective tax rate	16%		37%	

	2024 Rm	2023 Rm
Value distributed to stakeholders (prepared on the accrual basis)⁴	79 643	102 220
Communities, suppliers and business partners	(44 686)	(50 500)
Cost of sales – other ⁵	(31 152)	(28 247)
Consumables and services	(13 534)	(22 253)
Metals purchased		
IFRS 2 <i>Share-based Payment</i> charge on B-BBEE transaction – IBR and Impala CSOT, and Bokamoso Consortium ⁶	(1 658)	–
Employees and contractors	(26 810)	(22 933)
Labour and other		
IFRS 2 <i>Share-based Payment</i> charge on B-BBEE transaction – IBR ESOT ⁶	(274)	–
Governments	(2 931)	(7 154)
Taxes and state royalties		
Direct state taxes ⁷	(1 844)	(5 243)
State royalties	(1 087)	(1 911)
Lenders	(407)	(383)
Finance costs		
Shareholders	142	(97)
Value diminished/(retained) for non-controlling interests		
Dividends ⁸	(1 791)	(13 642)
Retention of shareholders' value	(1 228)	(7 511)
Number of employees		
Own employees and contractors	66 253	69 931

¹ Refer to [page 23](#) and the economic contributions in each country on [pages 24 to 28](#) and the analysis of our data by country from [page 30](#).

² VAT/sales taxes, customs duty and securities transfer tax (STT).

³ Primarily comprise state royalties.

⁴ Numbers have been prepared on the accrual basis.

⁵ Includes R663 million (FY2023: R713 million) non-state royalties.

⁶ Refer to [page 24](#).

⁷ Includes withholding taxes.

⁸ Includes dividends paid to non-controlling interests.

Our value-creating processes and activities

Our economic contribution through our value chain (refer to our value chain in the annual integrated report)

		VALUE CHAIN					CORPORATE ACTIVITIES
		Exploration	Mining	Processing	Market development and sales	Rehabilitation	
Activity		<ul style="list-style-type: none"> Brownfields exploration to optimise current orebodies and secure LoM I sustainability Maintain a watching brief on global PGM exploration. 	<ul style="list-style-type: none"> Prioritise zero harm Deep-level, conventional mining at Impala Rustenburg Shallow, mechanised operations at Marula, Zimplats, Impala Canada, Impala Bafokeng, Mimoso and Two Rivers Tailings re-mining in support of circular economy ambitions Responsible air quality, land, water, energy and waste management. 	<ul style="list-style-type: none"> Concentrate, smelt and refine ex-mine material and third-party concentrates in an environmentally responsible manner (reducing waste, efficient water and energy management). 	<ul style="list-style-type: none"> Responsibly supply customers and meet client-specific requirements in South Africa, Japan, China, the US and Europe Understand PGM demand fundamentals and their uses Stimulate future demand for PGMs. 	<ul style="list-style-type: none"> Regulatory compliance, including beyond compliance initiatives Efficient water management Pollution control Responsible energy use and waste and emission management in response to climate change risks and opportunities Integrated land management and biodiversity practices. 	<ul style="list-style-type: none"> Group strategic planning: Operational strategies, capital allocation and business development and corporate action Management services: Investor relations, stakeholder engagement, taxes, legal services, risk management and compliance, marketing, finance, human resources, information technology, internal audit and sustainable development.
	Tax risks impacting value creation/strategy	<ul style="list-style-type: none"> Impact of resource nationalism and policy/regulatory uncertainty (eg imposition of <i>ad hoc</i> taxes and export restrictions). 	<ul style="list-style-type: none"> Increased carbon taxes (refer to the impact and long-term outlook of these taxes on pages 15 and 16, of the climate change report). 	<ul style="list-style-type: none"> Regulatory uncertainty: 5% beneficiation levy for unwrought PGMs in Zimbabwe (refer to page 15). 	<ul style="list-style-type: none"> Impact of border carbon adjustments (BCAs) (refer to page 16) Compliance with transfer pricing regulations (refer to page 14) Impact of resource nationalism and policy/regulatory uncertainty (eg imposition of <i>ad hoc</i> taxes and export restrictions). 	<ul style="list-style-type: none"> Tax deductions on pre- and post-mine closure rehabilitation expenditure and activities. 	<ul style="list-style-type: none"> Tax transparency Regulatory uncertainty and compliance.
Opportunities and incentives	<ul style="list-style-type: none"> Possible incentives for mining critical/future-focus metals (jurisdiction-specific). 	<ul style="list-style-type: none"> Renewable energy projects will reduce carbon tax and potentially mitigate BCAs risks Diesel rebates at SA operations Carbon tax rebates Zimbabwe carbon trading scheme Section 12 L incentives for increased energy efficiency. 	<ul style="list-style-type: none"> Smelter operations mitigate risk of beneficiation levy in Zimbabwe Impact of beneficiation on value of export taxes or royalties Section 12 L incentives for increased energy efficiency. 	<ul style="list-style-type: none"> Leverage benefits of decarbonisation strategy Strong internal controls and compliance with the Group's transfer pricing policy. 	<ul style="list-style-type: none"> Investment strategy for financing of environmental rehabilitation liabilities Circular economy initiatives Refer to the ESG report for detail on our environmental strategy. 	<ul style="list-style-type: none"> Partnerships with revenue authorities and increased advocacy (refer to page 19) Transparent reporting guided by best practice reporting and disclosure frameworks. 	

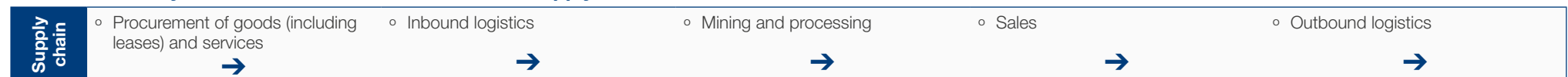
Our value-creating processes and activities continued

	VALUE CHAIN					CORPORATE ACTIVITIES
	Exploration	Mining	Processing	Market development and sales	Rehabilitation	
Strategies to manage value chain	<ul style="list-style-type: none"> Operational excellence Competitive asset portfolio Optimal capital structure Future focus. 	<ul style="list-style-type: none"> Operational excellence Organisational effectiveness Competitive asset portfolio Optimal capital structure Sustainable development Future focus. 	<ul style="list-style-type: none"> Operational excellence Organisational effectiveness Competitive asset portfolio Optimal capital structure Sustainable development Future focus. 	<ul style="list-style-type: none"> Operational excellence Optimal capital structure Sustainable development Future focus. 	<ul style="list-style-type: none"> Operational excellence Optimal capital structure Sustainable development. 	<ul style="list-style-type: none"> Operational excellence Organisational effectiveness Competitive asset portfolio Optimal capital structure Sustainable development Future focus.
Taxes and payments to governments	<ul style="list-style-type: none"> Indirect taxes (VAT) and income tax related to contractors and suppliers Permits and licence fees. 	<ul style="list-style-type: none"> Corporate income tax from mining operations Carbon taxes (South African and Canadian operations) State royalties Indirect taxes (VAT) Customs duties on imports. 	<ul style="list-style-type: none"> Corporate income tax Indirect taxes (VAT, customs duties) Carbon taxes (South African and Canadian operations). 	<ul style="list-style-type: none"> Corporate income tax Indirect taxes (VAT, customs duties) State royalties. 	<ul style="list-style-type: none"> Corporate income tax Indirect taxes (VAT, customs duties). 	<ul style="list-style-type: none"> Corporate income tax Indirect taxes (VAT) Withholding tax on dividends Taxes borne or withheld on corporate action (securities transfer tax).

The Group contributes to the economies and societies in which it operates at every stage of the value chain

Group social and economic contributions	<ul style="list-style-type: none"> Significant local capital investment Payments to contractors and suppliers Greenfields exploration activities remain dormant in a low PGM price environment. 	<ul style="list-style-type: none"> Payments to contractors and suppliers Contributions to host communities including infrastructure, education and upskilling Non-state royalties Employment opportunities. 	<ul style="list-style-type: none"> Payments to contractors and suppliers Contributions to host communities, including infrastructure, education and upskilling Employment opportunities. 	<ul style="list-style-type: none"> Payments to suppliers and contractors, including transport companies, generating goods and services taxes and export duties Employment opportunities. 	<ul style="list-style-type: none"> Payments to suppliers and contractors, generating goods and services taxes Employment opportunities. 	<ul style="list-style-type: none"> Payments to shareholders and lenders Additions or changes to asset portfolio Capital investment in operating assets and employment opportunities.
SDGs to which we contribute	SDG 12 SDG 17	SDG 3 SDG 4 SDG 5 SDG 6 SDG 8 SDG 9 SDG 11 SDG 13 SDG 17		SDG 9 SDG 17	SDG 6 SDG 7 SDG 11 SDG 12 SDG 17	SDG 17

Our sustainability oriented value chain enhances our supply chain



¹ Employment taxes on salaries, wages and other employee benefits are applicable across entire value chain.

Message from the chief financial officer



MEROONISHA KERBER, CHIEF FINANCIAL OFFICER

Amid a challenging year, Implats paid R1 245 million in corporate income taxes as part of its continued contribution to the economies in which it operates.

Welcome to Implats' second tax and economic contribution report, which continues our journey of committed transparency and accountability.

Implats paid R1 245 million (2023: R6 419 million) in corporate income taxes after recording a pre-tax loss of R20 426 million (2023: R9 787 million pre-tax profit) amid a challenging year characterised by increased geopolitical conflict, intensifying climate change, continuing energy shortages, stubborn inflation, as well as supply chain constraints and the lingering economic effects of a global pandemic.

Closer to home, the PGM industry continued to operate in a low price environment, the impact of which was initially highlighted in the prior year, which resulted in the overpayment of taxes (refer to the three-year tax trend on [page 21](#)) due to higher PGM prices before year-end. This was followed by a significant and unexpected decline in rhodium prices at the period-end.

The Group has recovered most of the overpaid taxes in the previous year and, in what reflects the continued challenging operating environment, maintained an effective tax rate of 16% (2023: 37%).

Tax and sustainability

We recognise the link between tax and sustainability and acknowledge that an increasing number of stakeholders view our tax contributions as a key measure of the Group's licence to operate. The purpose of this report is to provide an overview of the tax and economic contribution made by the Implats Group, and facilitate further transparency on how tax is managed as part of our commercial activities in line with our code of ethics.

At Implats, we believe in making a meaningful financial contribution to the countries in which we operate. The taxes we pay generate revenues for governments, which allows for investment in the development of their respective countries. In addition, we invest in the wellbeing of our employees, host communities and environments.

While current industry and economic conditions may impact the quantum of the Group's taxes and socio-economic contributions, Implats remains committed to its purpose – creating a better future.

Together with senior management and the board, and as the steward of data and analytical resources, the finance function is integral to developing a sustainable business model. The team is central to ensuring that sufficient internal controls exist over financial and non-financial data used to achieve its strategic goals, manage its associated risks and opportunities, execute on resource and capital allocation, as well as to measure and report on the Group's long and short-term performance.

This report, alongside our annual integrated, ESG and climate change reports, enables our stakeholders to understand and evaluate the lasting, positive impact Implats strives to make in pursuing its purpose. There is abundant information on our website about the full extent of our ESG approach, governance and sustainability performance.

Your feedback is valuable as we look to provide meaningful and insightful information on the taxes we pay.

Meroonisha Kerber
Chief financial officer

Our approach to tax

Our approach to tax and transparency is informed by our purpose, vision and values, and is integral to the Group’s ESG framework and our aspiration to play our part in contributing to the global UN SDGs.

Our tax policy

The Implats board, through the ARC, retains overall responsibility for the Company’s tax affairs and reviews and approves the Implats Group tax policy annually. The policy, which is reviewed by the ARC every other year, applies to other taxes paid to local and national governments and includes corporate taxes, taxes on employment, taxes on property, customs, excise duties, withholding taxes, capital gains, environmental and value added taxes and other payments to governments such as state royalties. The policy sets out the general framework underlying and guiding tax professionals within the Group, their conduct and their approach to working in relationship with external parties.

The Implats board has zero tolerance for:

- Deliberate tax evasion
- Bribery of tax officials
- Engaging in illegal, fraudulent or any other activity that compromises the Group’s integrity or reputation.

Commitment 01

- A commitment to act responsibly in relation to our tax affairs.

Compliance 02

- All applicable laws, rules, regulations and disclosure requirements in meeting our tax compliance and reporting responsibilities are observed
- We recognise the importance of respecting both the letter and ‘spirit’ of the law, taking steps to determine and follow the intention of the legislature where reasonably possible.

Governance 03

- Tax is managed in line with our Group governance framework and procedures including our code of ethics
- Zero tolerance toward illegal and unethical conduct.

Robust risk assessment 04

- Uncertain and or unquantifiable tax positions are subjected to robust risk assessment and supported by full disclosure.

Tax planning 05

- All tax planning is built on sound commercial business activity and has genuine substance
- Consideration is given to the legal, ethical, social and environmental implications of tax decisions
- No aggressive tax planning or complicated tax-avoidance schemes are used
- Tax incentives/ concessions are used responsibly to benefit our operations in the jurisdictions in which we operate, provided we conduct genuine business/commercial activities, and such incentives are aligned with the intention of the regulatory framework.

Standards 06

- Internationally recognised standards are met by applying transfer pricing policies, such as the arm’s-length principle.

Good working relationships 07

- Good working relationships with tax authorities, government bodies and other related third parties are developed and fostered in line with our code of ethics.

Professional and courteous conduct 08

- All dealings with governments, tax authorities and reputable external tax advisers are undertaken in a professional, courteous and timely way in line with our code of ethics.

Transparency 09

- We understand the value of our financial reporting for investors and society, and work to provide enhanced and balanced disclosure in communicating our tax affairs.

Pursue certainty 10

- We aim for certainty on adopted tax positions and seek written advice or confirmation from reputable external tax advisers where tax law is unclear or subject to interpretation, to ensure our position would, more likely than not, be settled in our favour with full disclosure to the relevant tax authorities.

Tax strategy

Our strategy has six focus areas where targeted actions and aspirations serve to achieve our purpose. We prioritise value in a zero-harm environment to deliver sustainable outcomes for all stakeholders.

Implats strategic framework

<p>Sustainable development</p> 	<p>Operational excellence</p> 	<p>Organisational effectiveness</p> 	<p>Optimal capital structure</p> 	<p>Competitive asset portfolio</p> 	<p>Future-focused</p> 
<p>We aspire to deliver an industry-leading sustainability performance, producing metals that sustain livelihoods through and beyond mining, creating a cleaner and better future for all.</p>	<p>We generate superior value for all stakeholders through modern, safe, responsible, competitive and consistent operational delivery.</p>	<p>We place people at the centre of our organisation, and engender a shared culture founded on our values to respect, care and deliver.</p>	<p>We pursue value creation by sustaining and leveraging a strong and flexible balance sheet within a prudent capital allocation framework.</p>	<p>We seek to leverage, strengthen and grow our diverse asset base through operational exposure to shallow, mechanisable orebodies.</p>	<p>We sustain and grow value by supporting present and future demand drivers, creating strong customer relationships and aligning our production to evolving demand.</p>
<p>Strategic outcomes associated with the SDGs (refer to the annual integrated report for additional information)</p>					
<p>SDG 1 SDG 2 SDG 3 SDG 4 SDG 5 SDG 6 SDG 11 SDG 13 SDG 16 SDG 17</p>	<p>SDG 4 SDG 5 SDG 8 SDG 17</p>	<p>SDG 4 SDG 5 SDG 8 SDG 16 SDG 17</p>	<p>SDG 8 SDG 9 SDG 11 SDG 12</p>	<p>SDG 8 SDG 9 SDG 11 SDG 12</p>	<p>SDG 6 SDG 7 SDG 13 SDG 17</p>

A sustainable tax strategy that supports our business strategy

Tax is vital to achieving each of the Group's strategic objectives. Therefore, Implats does not regard tax merely as 'a cost of doing business'. When approached correctly, tax can facilitate growth and efficiency for our organisation, while also enabling the Group to be a responsible corporate citizen that contributes to the social and economic growth of the countries in which we operate.

- We pay the right and proper amount of tax in each of our host countries
- We conduct the appropriate level of tax planning to ensure our tax policy is aligned with our strategic rationale
- We comply with the governing laws, rules, regulations and disclosure requirements.

Our sustainability activities and initiatives contribute towards 14 of the United Nations' Sustainable Development Goals (refer to the ESG report for additional information).



Tax governance

GOVERNANCE

Tax governance is vital to our tax operations, underpinning our commitment to transparency, accountability and ethical conduct. The Implats board and audit and risk committee ensure the Group’s tax and broader strategy and related decisions are guided by prudence and foresight.

Board oversight and dedication is instrumental in navigating the complexities of our industry as we strive to create and share sustainable value for all our stakeholders. Our governance practices empower us to assess risks and devise agile strategies to adapt to changing and sometimes uncertain geopolitical, regulatory and socio-economic circumstances, securing the continuity of our operations and safeguarding stakeholder interests.

Tax policy

1

Implats board

- The Implats board is committed to providing ethical and effective leadership as guided by the King IV Code on Corporate Governance and accepts overall responsibility for the tax strategy and policies it endorses.

Audit and risk committee (ARC)

- Advises the Implats board on significant tax risks and the appropriateness of responses
- Evaluates the process for identifying, monitoring and managing tax risks by reviewing management’s submissions on the various elements of the combined assurance model, including internal financial controls that cover tax risks, JSE section 3.84k CEO and CFO attestation on internal controls over financial reporting, and quarterly tax reports focusing specifically on tax risks and uncertain Group tax positions
- Reviews tax risk identification assessments
- Keeps abreast of relevant changes in tax legislation
- Ensures continuous tax risk monitoring by management.

Tax procedures

2

Chief financial officer

- Ensures appropriateness of tax procedures, processes and controls, and bears ultimate responsibility for the Group tax function
- Reviews all significant tax matters and associated tax risks identified and quantified by the Group tax department
- Approves all matters within the limits set by the Group approval framework
- Evaluates the adequacy of management actions to address tax risks.

Management of tax risks through controls

3

Group tax department

- Responsible for implementation and compliance with the board-approved tax policy, the results of which are reviewed by the CFO
- Ensures proper and timeous compliance and observes all laws, rules, regulations and disclosure requirements
- Provides business-focused tax advice and appoints tax experts to provide specialist tax advice
- Supports the Group financial reporting functions with tax calculations and disclosures
- Regularly updates the tax risk policy.



Aerial view of Two Rivers

Tax risk management

The risk management processes applied in identifying tax risks are consistent with the Group risk management process, which is used to identify and manage operational enterprise risk Group-wide, and allows for the areas of risk to follow the management structure of the relevant business unit.

Tax risk is proactively managed by preventing unnecessary disputes, adhering to internal reviews, procuring third-party assurance, engaging advisers and technical support where needed and engaging with the regulator.

Avoiding all tax disputes suggests an overly prudent position relative to our objective to enhance shareholder value, where commercial needs are paramount. We seek a tax efficient approach and, in doing so, give due consideration to reputation, brand and our corporate and social responsibilities.

As delegated to by the Implats board, the ARC sets and every other year reviews the tax policy, which includes the Group tax strategy, and is ultimately accountable for policy compliance. Further, the ARC sets the key tax principles related to managing tax risks and tax-related issues, as indicated on [page 12](#), in support of the Group ethics policy.

While the equity-accounted entities are excluded from our reporting boundary in this report, the ARC is regularly informed of their tax position and governance. Implats management representatives are appointed to the audit and risk committees of these joint venture entities and provide the ARC with minutes of audit committee meetings, including tax reports and any other relevant information required to satisfy the ARC of the equity-accounted investments' internal financial control environment.

TAX RISKS

Tax risk is the risk of possible:

- Financial loss due to increased tax costs, interest and penalties
- Suboptimal commercial outcomes due to missed opportunities to structure arrangements in an efficient manner
- Restricted ability to achieve goals due to reputational damage or strained relationships with stakeholders (eg, tax authorities).

The process of risk identification, assessment and treatment is contained in the Implats Mandatory Code of Practice on the Risk Assessment Process (COP 04.00.03).

Tax risk is ideally managed by preventing unnecessary disputes, ensuring internal review processes are in place and adhered to, as well as procuring external third-party assurance through audits and engaging advisers and technical support, and engagement with the regulator, when applicable.

Business decisions are supported by a detailed risk assessment that includes a summary of the facts and a full description of the tax risks, a description of risk mitigation actions, an assessment of their adequacy and effectiveness, an assessment of the probability of the tax risks occurring, as well as any accompanying recommendations.

Avoiding all tax disputes indicates an overly prudent position, which is not in line with our main objective to enhance shareholder value. The Group's commercial needs are paramount and all tax planning and advice shall be undertaken in this context. Where alternative paths exist to achieve the same commercial result, the most tax efficient approach should generally be recommended.

Consideration is given to the Group's reputation, brand and corporate and social responsibilities when assessing tax-related opportunities, as well as the applicable legal and fiduciary duties of the Group's directors and employees. Together, these factors form part of the overall decision-making and risk assessment process.

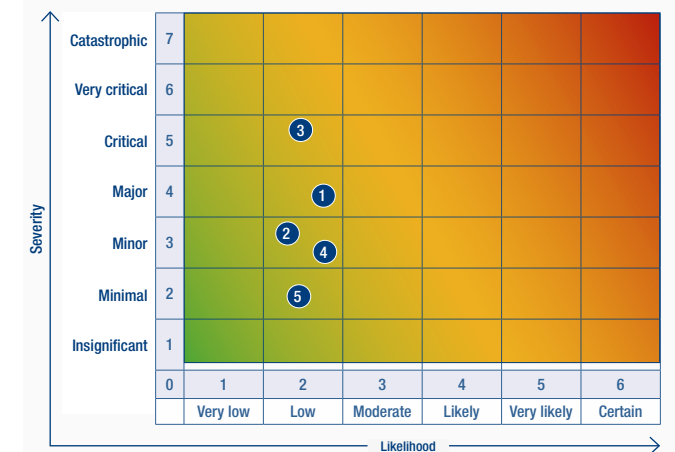
Operational accountability for ensuring compliance with the tax policy and risk management framework is delegated to the CFO, who – supported by the Group head of tax services and qualified and experienced employees – is responsible for managing the Group's tax affairs.

The CFO provides quarterly reports to the ARC on significant tax matters and/or risks and the adequacy of the management actions taken to address such risks, as well as updates to tax legislation.

Group tax risks

The residual risks relating to tax governance are lower than the Group strategic risks and are therefore not discussed in the annual integrated report. The specific and general tax risks and the associated mitigating measures disclosed in this report form the basis of the residual risk heat map below. Tax risk management, including the responsibility to identify, measure and monitor risks and their mitigating actions, adhere to a defined management structure and tax risk approval and governance framework.

Residual risks have been reduced to acceptable levels and are within Implats' risk appetite and tolerance limits.



RESIDUAL RISKS

- Unforeseen financial losses** caused by the introduction of new taxes, changes in tax rules and regulations and interpretation differences
- Tax penalties** imposed due to incorrect determination of the tax base, wrong calculation of taxes, partial payment, untimely delivery of tax returns to the tax authorities
- Reputational risk** resulting in negative publicity, creating a high-risk profile with the tax authority or a higher risk rating leading to increased costs of compliance
- International tax compliance risks** – Transfer mis-pricing to shift profits, misclassifying offshore payments to avoid withholding tax, etc
- Accounting disclosure differences

Tax risk management *continued*

TRANSFER PRICING AND PROFIT SHIFTING

The Group aims to pay the right and proper amount of tax in each country in which we operate and the Group supports the international transfer pricing standards and guidelines issued by the Organisation for Economic Cooperation and Development (OECD).

In line with its commitment to ethical and transparent business practices, and in addition to the Group tax policy, the Implats transfer pricing policy requires Group entities to be treated individually as independent entities and for intra-group transactions to be conducted on an arm's-length basis.

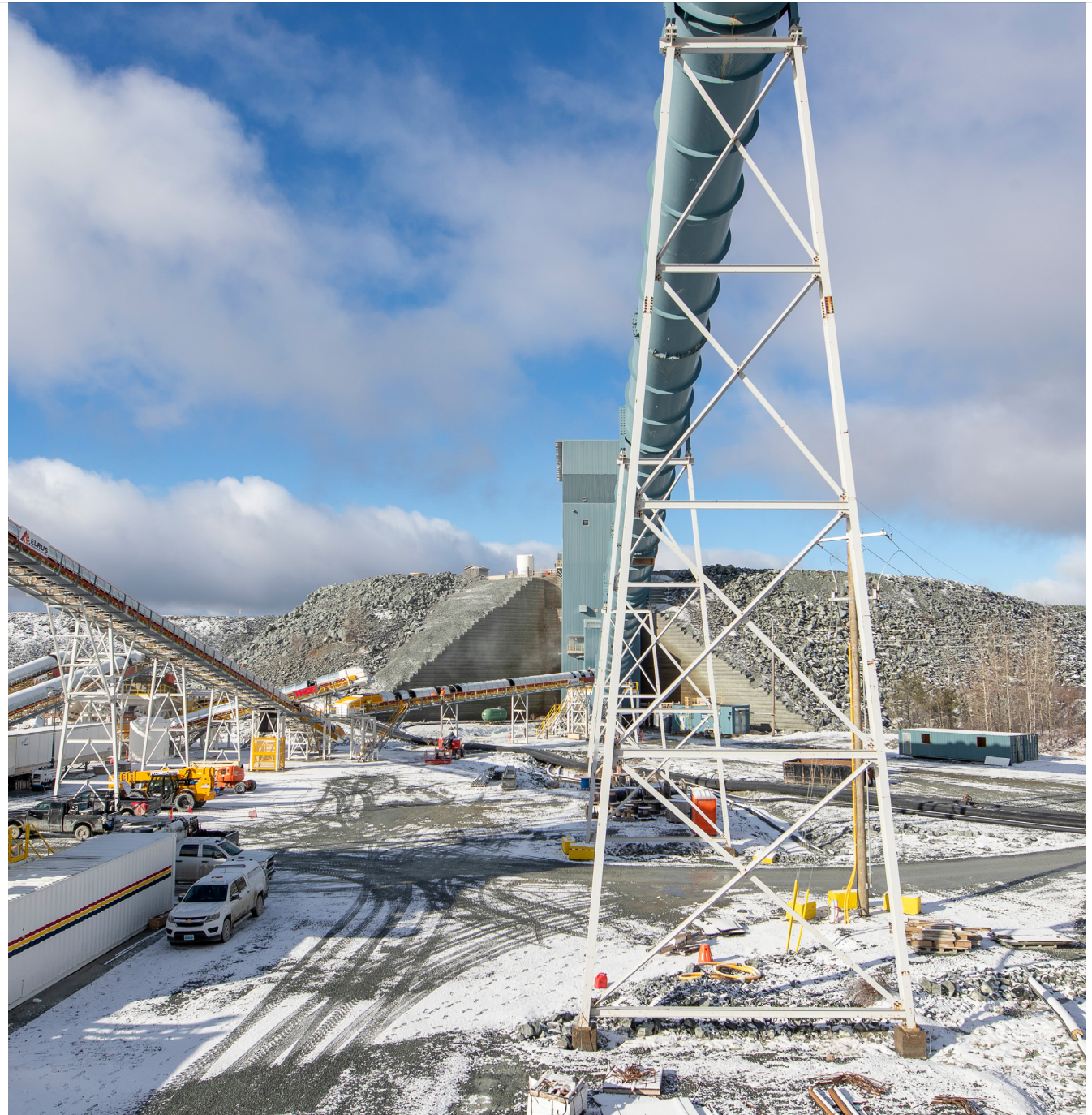
Implats' policy and guidelines prescribe the application of the arm's-length standard and the methods used as the basis for price determination. These are applicable to all cross-border transactions within the Group, including supplying services, procuring semi-refined products, developing processes and intellectual property, providing financial assistance and foreign currency transactions. This ensures a consistent Group-wide approach aimed at reflecting the commercial and economic substance of related-party transactions.

TAX INCENTIVES AND TAX HAVENS

We do not accept tax incentives that are not specified in law or not generally available to other industry participants. We only make use of incentives or government initiatives designed to incentivise particular economic activity by reducing tax payments that are aligned with our business and operational objectives and where we have a qualifying business activity.

We seek to implement tax incentives in the way intended by relevant legislation. If there is uncertainty, we engage the relevant authorities to align implementation to the intended policy objectives. See [pages 25 and 28](#) for detail of the R62 million (2023: R84 million) tax incentives at our operational jurisdictions.

Implats does not invest in, or through, countries considered to be tax havens for the sole purpose of reducing a tax burden. Such investments will only be considered if they are supported by sound economic and strategic reasons and aim to develop the activities included in the Group's corporate purpose.



Mining operations in the winter at Impala Canada

Tax operating landscape – risks and opportunities

Current geopolitical events and the fiscal aftermath of the Covid-19 pandemic continue to affect many economies and authorities are seeking to mobilise their domestic revenues. Additionally, as countries battle to secure the finance required to meet the UN SDGs, tax remains a stable and reliable source of state revenue to finance these global goals.

Notable developments with a potential to impact Implats are highlighted below.

GLOBAL ANTI-BASE EROSION RULES (PILLAR II)

The Pillar II Rules are a global minimum tax developed by the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting (BEPS), led by the OECD, which aim to subject multinational enterprises (MNEs) with annual revenue exceeding €750 million to an effective tax rate of at least 15%, regardless of where the MNEs profits are located.

In the Annual Budget Speech held on 21 February 2024, the South African government issued the Draft Global Minimum Tax Bill to give effect to Pillar II for qualifying multinationals. It is proposed that this legislation will be applicable to fiscal years commencing on or after 1 January 2024. As such this legislation will be applicable to Implats from 1 July 2024.

The income inclusion rule will enable South Africa to apply a top-up tax on profits reported by qualifying South African MNEs operating in other countries with effective tax rates below 15%, while the domestic minimum top-up tax will enable the South African Revenue Service (SARS) to collect a top-up tax for qualifying multinationals paying an effective tax rate of less than 15% in South Africa.

Implats supports the OECD framework, which dovetails with the Group's purpose to create a better future-through transparency, playing our role in improving the global tax system and ensuring that all governments receive a fair share of tax revenues.

While Guernsey has a zero percent corporate income tax rate (refer to [page 31](#)), the income derived by Zimplats Holdings

is already subject to taxation in Zimbabwe at a rate much higher than 15%. Consequently, while uncertainty remains over the current draft Bills, Implats does not anticipate paying higher taxes in any of the countries in which it operates because their effective corporate income tax rates are well above 15%.

CLIMATE CHANGE AND SUSTAINABILITY

Climate change is a global environmental and social risk faced by all countries. Collective action based on comparable domestic standards, market-based mechanisms, regulations and financing is intended to lower global risk and, in turn, lower competitiveness and leakage issues.

As the world unites behind the urgent goal of net zero, Implats has a critical role to play in realising global net zero targets (refer to the uses of our PGMs and Group's medium to long-term business operational strategies in the annual integrated report).

The tax landscape is also evolving to address climate change and presents both risks and opportunities to entities committed to contributing to global decarbonisation efforts.

Our decarbonisation journey to 2050

Implats has committed to achieving carbon neutrality by 2050, with a short-term target of a 30% reduction in scope 1 and 2 carbon emissions from the FY2019 base year by FY2030. To meet its targets, Implats is transforming how its operations source and use energy, through several Group-wide initiatives including wheeling arrangements and other renewable energy projects, which are at various stages of investigation and construction.

Zimplats completed construction of the first 35MW phase of its 185MW solar power project – the Group's first large-scale project towards meeting its decarbonisation targets. The 35MW plant was tested and commissioned, with grid connection completed after the reporting period, in July 2024. Construction of the second phase of the project, a 45MW solar plant, will start in FY2025 and is scheduled for commercial production in FY2026.

To further strengthen security of electricity supply in South Africa, while reducing greenhouse gas emissions and long-term input costs, Implats is also assessing several renewable energy wheeling options at other South African operations. In addition to meeting our decarbonisation goals, these projects create opportunities to reduce our carbon tax liability.

More information on the Group's energy mix and decarbonisation roadmap is contained in the climate change report.

TAX-RELATED RISKS AND OPPORTUNITIES

Carbon taxes

Implats monitors both the significant physical and transition-related risks. The impact of electrification on the automotive industry and commodity prices is included in Implats' price assumptions for accounting valuations, impairment testing and related deferred tax calculations.

Our South African and Canadian operations are subject to carbon taxes and paid an aggregate carbon tax of R28 million in the current year (2023: R15 million). Refer to [page 23](#).

Both South African and Canadian carbon taxes are expected to rise in line with global trends, impacting cash flows through increased tax liabilities. While Eskom is currently prohibited from on-charging its own carbon taxes to end of December 2025, the cumulative expenditure on carbon taxes in South Africa from calendar year 2025 to calendar year 2029 is estimated at R326 million if no mitigations are implemented.

The Group has established an internal carbon price to stress-test its investments, which is now part of the capital approval process. While Zimbabwe currently does not have a carbon pricing regime, Zimplats has adopted the South African carbon price.

Fuel switching, zero-carbon fuels and offsets

To assist industries transition their activities and shift to sustainable and low-carbon practices in a cost-effective way, a carbon offset tax-free allowance is provided to companies. The South African Carbon Tax Act (No 15 of 2019) aims to stimulate reduced carbon tax liabilities and encourage additional investments in eligible low-carbon offset projects.

Although zero-carbon fuels and offsets are not part of our short-term decarbonisation plans to 2030, they will play a future role in the Group meeting its carbon neutrality target by 2050.

Tax operating landscape – risks and opportunities *continued*

Developments in unilateral border carbon adjustments (BCAs)

BCAs which, in broad terms, adjust the price of certain carbon-intensive goods to reflect the carbon output of their production processes, are one of several policy solutions being implemented to minimise such risks. As our export regions – such as EU countries, the US and other key economies – explore and adopt BCAs, Implats and its customers may be impacted by these and other carbon taxes in their operational jurisdictions.

The EU's Carbon Border Adjustment Mechanism, aimed at taxing embedded carbon in goods imported to the EU, does not currently apply to PGMs or base metals. This, however, may change in future revisions to the framework, making the Group's products more costly and less attractive to EU-based customers.

Implats will therefore continue to survey the evolving regulatory landscape to ensure we address emerging risks and exploit any opportunities aligned with our purpose, strategic objectives and sustainability framework.

BENEFICIATION IN ZIMBABWE

In order to promote the development of in-country processing facilities, the Zimbabwean government is proposing to implement a 5% export levy on PGM concentrate. Implats is currently in the process of refurbishing its base metal refinery and other smelters, which it intends to finalise by 2025. Consequently, it applied for and was granted a waiver from the levy.

LEGISLATIVE CHANGES IMPACTING OUR EMPLOYEES

The administrative risks associated with implementing the South African Pension Funds Amendment Bill

The Pension Funds Amendment Bill introduces changes to South Africa's retirement savings system to address challenges that arose during the Covid-19 pandemic. The intention of the new 'two-pot' retirement savings system is to promote the preservation of retirement fund investments until members retire, while also allowing them access to a portion of their accumulated savings during their working years. The Bill raises potential risks related to Implats' tax administrative compliance with the new

legislation. Implats has several responses in place which are overseen by the social transformation and remuneration (STR) committee of the board.

Potential impact of the South African National Health Insurance (NHI) Act

The South African National Department of Health has confirmed planned tax increases and other tax changes to fund the National Health Insurance scheme. The health, safety and environment (HSE) committee has oversight of the possible impact of the NHI on the healthcare services of Implats' South African operations and the related mitigation measures. The STR will oversee analysis of the employee and social risk posed by this legislation and monitor mitigation plans for these exposures.

LEVERAGING TECHNOLOGY TO OPTIMISE TAX OPERATIONS

Implats makes use of IFRS-compliant tax accounting software, which automates the tax process to generate tax journals and provide Group tax disclosures to ensure the necessary operational efficiencies and alleviate tax risks. These systems drive the corporate tax lifecycle using built-in workflows and tasking to ensure the timely review and approval of spreadsheets and electronic provisional tax calculations.

Built-in logic and controls guide users through current and deferred tax calculations, generating system tax journals and general ledger reconciliations, which improve integration into the enterprise resource planning (ERP) system. Electronic Group reports are generated with drill-down functionality to analyse the composition of balances and to identify anomalies.

Tax systems provide IAS 12 disclosures for local, functional and reporting currencies, including automated tax rate reconciliations and unrecognised deferred tax assets. The Group's company tax returns, local taxes and royalty calculations are optimised by applying unique flexible templates, which are constantly modified for any new legislative or reporting requirements.

Additionally, ERP functionality is used to safeguard, calculate and report on VAT, PAYE and other indirect taxes for submissions, thus improving the efficiency and effectiveness of the entire tax function.



Lancing one of the furnaces with an oxygen lance at Impala Rustenburg

Tax operations

The Group tax function seeks to remain effective and relevant by embracing innovation to leverage and improve the tax teams and enhance their operations. The team collaborates with internal and external parties to achieve efficiencies and respond to our dynamic operating environment.

The Group tax department and the tax functions of subsidiary companies are responsible for the functional deployment of the tax policy.

RESPONSIBILITIES AND PROFESSIONAL CONDUCT

Group tax professionals are committed to:

- Effectively managing risks by applying the tax risk strategy
- Observing and complying with all applicable laws, rules, regulations and disclosure requirements
- Applying diligent professional care and judgement to arrive at well-reasoned conclusions
- Ensuring all decisions are taken at an appropriate level and supported with documentation that evidences the facts, conclusions and risks involved
- Undertaking all dealings with tax authorities, government officials and other third parties in a professional, courteous and timely way
- Ensuring compliance with the Group ethics policy and any anti-bribery policies and legislation
- Engaging and seeking to influence applicable industry bodies or associations, governments and other external bodies, where possible and appropriate, to shape future tax legislation and practice.

The Group tax department collaborates with the rest of the Group as an equal partner in providing clear, timely and business-focused advice across all aspects of tax. Where alternative routes exist to achieve the same commercial results, the most tax efficient approach, in compliance with all relevant laws, should be recommended.

RESOURCE MANAGEMENT

The tax team is qualified and competent to effectively and efficiently support the Group as a business partner and drive business value.

Performance agreements and personal development plans for the Group's tax employees are in place to support the achievement of the appropriate behaviours. The performance of all tax personnel within the tax function is measured against the planned annual goals and agreed key performance indicators (KPIs).

ASSURANCE

Tax data is assured externally and the Group has assisted in developing a bespoke electronic tax system to strengthen the integrity of tax data, and facilitate various levels of internal review, reconciliation to financial information, and accurate calculation and reporting on all tax matters.

Tax compliance is assured through:

- Group-wide internal control policies and procedures
- Tax rules embedded in the ERP systems to improve effectiveness of internal control
- Internal audits conducted by the Group's internal auditors
- Third-party compliance testing on important processes and systems and external audit reviews
- Monitoring and guidance by the Group tax department
- Monthly review of tax compliance reports by the Group CFO
- The Group compliance function provides mechanisms to report compliance violations
- Internal tax professionals certify to the adherence of internal control policies and procedures through the Group control self-assessment process.

INTERNAL REPORTING

On a quarterly basis, the Group tax department prepares the Group tax report, which is presented to the ARC, and includes material tax matters, tax risks, material tax legislative changes impacting the Implats Group and the tax compliance status of the Company and its subsidiaries, highlighting instances of non-compliance.

Operational accountability for ensuring compliance with the tax policy and risk management framework is delegated to the CFO, who – supported by the Group head of tax services and qualified and experienced employees – is responsible for managing the Group's tax affairs.

The CFO provides quarterly reports to the ARC on significant tax matters and/or risks and the adequacy of the management actions taken to address such risks, as well as updates to tax legislation.

WHISTLEBLOWING AND STAKEHOLDER CONCERNS

To realise its purpose and safeguard against fraud, corruption, bribery and other unlawful behaviour, Implats has various policies (<https://www.implats.co.za/esg-policies-and-key-documents.php>) and reporting mechanisms in place that include toll-free ethics hotlines in South Africa, Zimbabwe and Canada which are managed and operated independently and available to all our employees and external stakeholders to report concerns about potentially unethical, unlawful or unsafe conduct or practices in a confidential and anonymous manner:

- South African operations: 0800 005 314 available 24 hours a day, seven days a week, to facilitate reports in all the official languages
- Implats: 0772 161 630
- Impala Canada: 1-866-921-6714 (toll-free) or email the operation at email address: impalacanada@integritycounts.ca to lodge complaints or grievances.

The ARC and chairman of the board oversee whistleblowing reports and remedial actions. All reported allegations are investigated. The Group's internal audit function assesses and tracks management actions in response to confirmed findings as recorded in forensic audit reports.

In addition to the whistleblower hotline, which allows stakeholders to raise concern over unethical or unlawful behaviour relating to tax, the Group's code of ethics prohibits conflicts of interests and requires employees to conduct Implats' business with integrity. The code further requires all taxes, fees and royalties related to mineral extraction and general trade be duly paid to governments. The code requires employees to report any concerns (from any source) regarding illegal or unethical behaviour, including those relating to tax, to their line manager, the head of forensics or the ethics officer, or the hotline without fear of retribution.

Stakeholders are thus able to raise concerns within the tax or finance function irrespective of the level or role of the employee, which will be reported internally, in line with the ethics policy requirements.

FINANCIAL REPORTING AND PROVISIONING

The tax charge and provisioning must reflect the most up-to-date information at each reporting period, to ensure the Group will have no significant adjustments to the actual tax charge or tax returns. Therefore, the Group tax department supports the Group financial accounting team by:

- Adhering to Group reporting instructions and timelines
- Calculating the South African tax charges and reviewing the tax calculations performed by foreign tax teams in accordance with the Group accounting policies

Tax operations continued

- Reviewing all potential uncertain tax positions that require separate disclosure
- Assisting with questions and clarifications required as part of the reporting and auditing processes
- Preparing the Group's consolidated tax charge in accordance with all applicable governance and accounting requirements
- Providing input for the Group tax transparency and economic contribution report.

UNCERTAIN TAX POSITIONS AND CONTROVERSIES

Implats is subject to income taxes under the various income tax regimes in the countries in which it operates. Significant judgement is required in determining the Group's liabilities for income taxes due to the complexity of legislation, which is often subject to interpretation.

Consequently, disputes may arise with tax authorities over the interpretation or application of certain rules with respect to the Group's tax affairs within a particular country, and the outcome of these claims and disputes cannot be predicted with certainty. Management obtains independent legal and/or tax practitioner opinions, which inform and support the tax positions the Group adopts on complex tax matters that require significant judgement.

Implats Group companies are involved in tax queries, litigation and disputes with various tax authorities in the normal course of business. A detailed review is performed regularly on each matter and a provision is recognised, where appropriate.

Regardless of whether potential economic outflows have been assessed as probable or possible, individually significant matters are disclosed in the annual financial statements (refer to notes 21 and 34 of the consolidated annual financial statements).

The total income tax credit across all the Group's jurisdictions amounted to R3 275 million (2023: expense of R3 609 million) for the year. Tax legislation is complex and results in uncertain tax positions during the ordinary course of business.

In addition to material provisions in the annual financial statements, the Group dealt with the following matters during the year, largely emanating from several requests for information issued by the revenue authorities. Implats complied with all requests.

Income tax South Africa

In the prior year, the SARS commenced audits of the 2019 to 2021 returns of Impala, which were successfully concluded in the current year without further adjustments.

In the prior year, SARS audited and issued a revised 2018 assessment to Impala Bafokeng Resources (Pty) Ltd relating to the acquisition by the company of the remaining interest in the Bafokeng Rasimone Platinum Mine Joint Venture and the associated capital expenditure that the company may claim on the acquisition. The company was, however, not in a tax paying position in 2018 and the adjustment by SARS did not result in additional taxes. The adjustment reduced the balance of unredeemed capital expenditure carried forward to subsequent years on which SARS levied an understatement penalty of R165.8 million and interest of R57.1 million which were paid. In the current period, management filed an objection against the interest and penalties, which SARS partially allowed, reducing the penalty by R160.8 million and refunding R55.6 million of the interest. Management is satisfied with the outcome of the objection and will not pursue the matter further.

Zimbabwe

Zimplats has contested the Zimbabwe Revenue Authority (ZIMRA) prescribed computation methodology for calculating taxable income that requires all deductible operating and capital expenditures to be split based on the prevailing regulated foreign currency retention and surrender splits.

Zimplats filed a declarator, wherein it sought confirmation of its methodology by the High Court of Zimbabwe. The High Court ruled in favour of ZIMRA, and Zimplats immediately appealed the matter to the Supreme Court. Subsequent to year-end, the Supreme Court of Zimbabwe ruled in favour of ZIMRA in respect of one of the tax matters. The ruling did not have any financial impact as Zimplats has on a without prejudice basis, settled the disputed liabilities involved in these cases.

Other matters South African entities

Mineral and Petroleum Resource (MPR) royalty

In the prior year, SARS commenced with an audit of the 2017 to 2023 royalty returns submitted by Impala and in the current year issued a letter of audit findings that disallowed the deduction of the prepaid royalty expense for the 2020 to 2023 years of assessment in the calculation of the royalty percentage for the

respective years. If unchallenged, Impala would be liable for an additional royalty tax of R202 million and an understatement penalty of R101 million. Management disagrees with SARS's findings and is in the process of preparing a response to SARS. Accordingly, no provision was raised for the potential R303 million liability in the current year.

Audits of the Marula MPR royalty returns for the 2019 to 2022 years of assessment were initiated in June 2024 and remain ongoing at period-end.

Customs VAT

As reported in the prior year, SARS detained trucks delivering concentrate from Zimbabwe to South Africa which were subsequently released on condition that a penalty of R9 million was paid. A letter of appeal was submitted to SARS. Since no initial feedback was received from SARS, management proceeded to prepare for litigation to resolve the matter and SARS was thus notified. SARS conceded on the matter and repaid an amount of R7.6 million. Management is awaiting the refund of the remaining balance.

Marula objection against VAT penalties

SARS denied Marula's request to remit a R3 million VAT penalty and interest levy relating to late payment of VAT. Management lodged an objection against the penalty and interest levied of which 90% was remitted.

Late payment of provisional tax

As reported in the prior year, the Impala and Marula share ownership trusts were levied penalties and interest for the late payment of its first provisional payment in FY2023 due to administrative differences in the fiscal year-end of the trusts. Management disagrees with SARS and lodged an objection against the penalties levied in late FY2024.

Zimplats

State royalties

Supported by expert counsel opinion, royalties are paid based on the gross fair market value of the minerals produced. ZIMRA, however, contends that royalties should be paid based on the final gross fair market value without deducting further refining fees. Zimplats disputed the ZIMRA interpretation which resulted in their computed shortfall of US\$7.1 million. The matter is still to be heard in court.

Advocacy and relationships with stakeholders

As part of our commitment to responsible corporate citizenship, we maintain positive and sustainable relationships with revenue authorities.

ADVOCACY

Implats participates in several industry associations to develop best practice and shape host country policies.

We support effective tax systems and provide tax authorities with our view on proposed legislative amendments through our legal advisers and membership of and association with industry bodies.

From a broader ESG perspective:

- In South Africa and Zimbabwe, Implats is an active member of the Minerals Council South Africa and the Zimbabwe Chamber of Mines, respectively. These industry bodies advance safety, health and good corporate governance within the mining industry, as well as help shape legislation governing the mining industry
- Implats is a member of the Energy Intensive Users Group of Southern Africa (EIUG), a consumer-led organisation committed to working with government and other stakeholders to develop effective solutions to South Africa's energy crisis and ensure that it transitions to a lower-carbon future within appropriate timeframes
- Beyond southern Africa, Implats is a member of the International Platinum Group Metals Association (IPA), a non-profit association representing the interests of leading mining, production and fabrication companies of the global PGMs industry, that provides a platform to address issues of common concern and to jointly engage with stakeholders, including policymakers in the EU
- Implats supports the World Platinum Investment Council (WPIC) and their work in developing the market for platinum investment demand
- Implats is a member of the marketing organisation, Platinum Guild International (PGI), which was created to develop global platinum jewellery demand. PGI works collaboratively with partners, conducting extensive marketing programmes in the four main platinum jewellery markets of China, Japan, the US and India

- Implats participates in market development activities with its industry peers and supports the development of the hydrogen economy through several partnerships and its investment in AP Ventures, a private equity vehicle supporting activities in key evolving end-uses for PGMs, including fuel cells and energy storage.

STAKEHOLDER ENGAGEMENT

Our stakeholders are those groups who can affect or be affected by our activities. Stakeholders have a vested interest in our tax transparency, the economic contributions we make and our approach to long-term sustainability and profitability.

Implats supports responsible business practices and is committed complying with the highest standards of corporate governance and the principles of the King IV Code of Corporate Governance for South Africa (King IV™).

Although Implats does not conduct tax lobbying activities, the Group maintains regular, open and constructive communication with tax authorities and other stakeholders in the jurisdictions in which it operates.

Implats participates in tax authorities' formal consultations where it is expected that the matter under consultation will have a material impact on the Group. We participate in discussions of tax-related proposals with industry-related tax groups, where possible and appropriate.

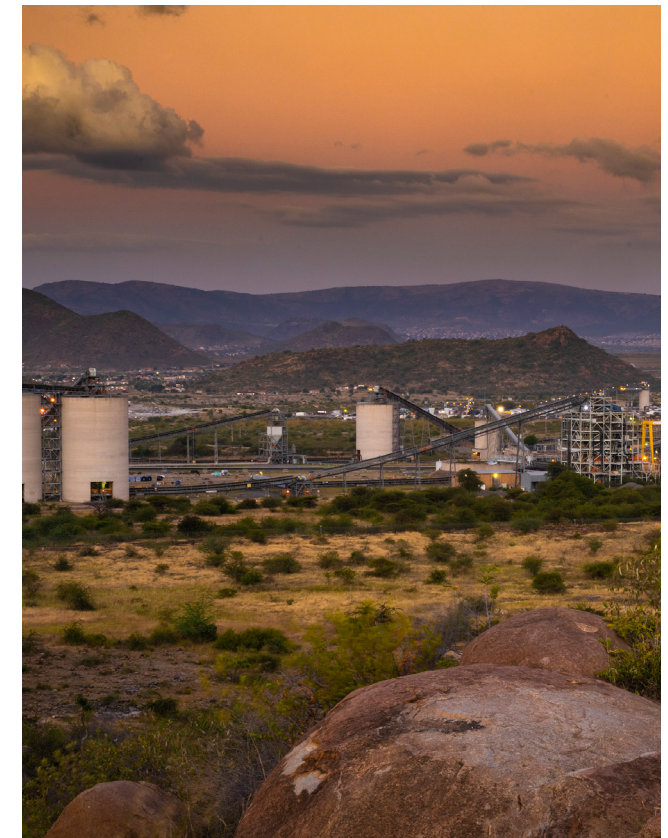
Audits and tax authority enquiries are handled in a courteous, timely and professional way. Enquiries considered include:

- The overall liability at stake, including penalties and interest
- The likelihood and, if applicable, the success of litigation and the need to adapt the terms of engagement with the tax authority
- The likely resource requirements
- The reliance on expertise or information from other parts of the Group
- The risk of reputational damage.

We fully comply with country-by-country reporting requirements. As the parent company, Implats files the full set of the Group's required data with SARS.

Implats recognises the legitimate information and sustainability needs of our stakeholders. We endeavour to provide transparent disclosure of our approach to tax, governance, strategy and economic contributions, to allow stakeholders across our value chain – including from an upstream (suppliers), downstream (clients) and investor perspective – to determine the effects on their ESG initiatives of their business relationships with the Group.

This includes effective, responsive and evolving stakeholder relations, the strategy for which considers King IV and the AA1000 Assurance Standard principles of materiality, completeness and responsiveness.



Sunset over the Marula operation

Advocacy and relationships with stakeholders continued

Stakeholders	Interests, expectations and priorities	Implats' approach and responses
Investors	<ul style="list-style-type: none"> ◦ Tax information is increasingly incorporated into investment risk analysis processes, and used more frequently in the compilation of ESG rankings ◦ The sustainability of our tax practices and responsible management of tax-related risks ◦ Demonstrating high-quality tax and economic contribution disclosures ◦ ESG impacts on investor returns (eg carbon tax risks and opportunities). 	<ul style="list-style-type: none"> ◦ Our sustainability approach to tax is embodied by our commitment to remain a responsible citizen, pay our taxes fairly, comply timely with laws, and ensure that our tax planning is based on commercial business activity, which is aligned with our shareholders' long-term interests ◦ We support our investors by ensuring relevant, high-quality and transparent tax disclosures which are fully compliant with the relevant laws, frameworks and guidelines as set out on the basis of preparation on page 2.
Employees	<ul style="list-style-type: none"> ◦ Ethics and transparency ◦ Workforce composition and diversity ◦ Accurate and responsible tax practices regarding taxes collected safeguard our employees ◦ Compliance with privacy laws. 	<ul style="list-style-type: none"> ◦ Implats' people are key to the Group achieving its purpose and vision ◦ Implats aspires to be an employer of choice by supporting diversity initiatives, fair pay principles and investing in its employees through wellness, personal growth and professional development programmes. Implats adheres to its codes of conduct and ethics frameworks – consequently creating a supportive environment for its employees.
Communities	<ul style="list-style-type: none"> ◦ Social and economic contribution to communities through salaries and other employment benefits ◦ Local enterprise development and preferential procurement in the areas in which we operate ◦ Employment and skills development opportunities ◦ Paying all taxes and royalties due that benefit host communities ◦ Responsible rehabilitation practices ensuring that we are fully funded to restore future liabilities. 	<ul style="list-style-type: none"> ◦ Constructive and beneficial relationships with mine-host communities and sustainable socio-economic development are priorities for the Group and its leadership (refer to our stakeholder interests disclosures in the annual integrated report) ◦ Additional information about how communities impact and are impacted by Implats' operations is provided in the integrated and ESG reports.
Governments	<ul style="list-style-type: none"> ◦ Collection of tax revenue and state royalties ◦ Regulatory compliance ◦ Accurate and compliant tax payments ◦ Transparency ◦ ESG performance and reporting (refer to our tax landscape on page 15 for discussion on the effects of carbon emissions-related tax risks and opportunities) ◦ Approach to our relationship with the Department of Mineral Resources (DMR) and compliance. 	<ul style="list-style-type: none"> ◦ Delivering superior value to all stakeholders is dependent on ensuring full or beyond compliance with legislative and policy requirements in the areas in which we operate ◦ Implats is committed to complying with the laws of the areas in which we operate, paying our taxes timeously, disclosing accurately and transparently information requested, and engaging openly and honestly through dialogue with revenue authorities ◦ Leveraging IT and implementing strong internal controls to strengthen tax compliance ◦ We aspire for open and transparent relationships with the relevant tax authorities through regular dialogue and proper disclosure ◦ Governments benefit from Implats' contribution to their countries' overall gross domestic product and revenue collection.
Customers	<ul style="list-style-type: none"> ◦ Security of supply of our products ◦ Scope 3 downstream greenhouse gas emission impacts on customers' value chains ◦ Our products support global sustainability efforts with widespread green uses for PGMs, which curtail vehicle emissions and are important for clean future power generation initiatives in a potentially circular economy. 	<ul style="list-style-type: none"> ◦ Our operational strategies ensure a stable output and supply of PGMs. The Implats capital allocation framework and the business development strategies ensure a long-term sustainable business ◦ Implats' commitment to responsible sourcing and production processes to limit the Group's downstream scope 3 greenhouse gas emission impacts on our customers' value chains ◦ We require our counterparties to submit tax compliance certificates in line with our responsible sourcing policy ◦ Refer to the annual integrated report for more information.
Suppliers	<ul style="list-style-type: none"> ◦ Effective and ethical procurement practices ensuring fair tender procedures that prevent unlawful behaviour such as fronting ◦ Reasonable payment conditions and adherence thereto ◦ Effective supplier engagement and retention of supplier information ◦ Compliance with the Protection of Personal Information Act and other legislative requirements. 	<ul style="list-style-type: none"> ◦ Creating a sustainable supply chain drives value creation and operational effectiveness. The principles of good corporate governance and sustainability play a leading role in the long-term risk management of a company and Implats is committed to responsible business practices for the Group and our supply chain partners ◦ Installation and the maintenance of electronic systems with capabilities that facilitate easy engagement allowing suppliers to digitally maintain their tax compliance documentation, etc.
Industry bodies and partners	<ul style="list-style-type: none"> ◦ Participation in multiple industry bodies and collaboration with peers ◦ Leverage relationships to enhance future value creation globally and in the industry. 	<ul style="list-style-type: none"> ◦ Our ESG-related partnerships include membership in various industry bodies, including the Mineral Council South Africa and the Zimbabwe Chamber of Mines, the IPA, PGI as well as the Group's investment in AP Ventures (refer to page 19).

Group tax performance

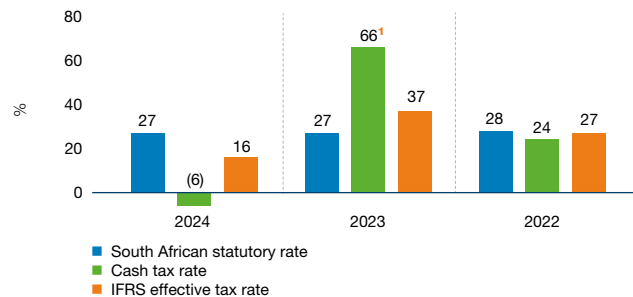
Group effective corporate income tax rate on underlying earnings.

The statutory tax rate is the rate imposed by law on taxable income. We define the effective tax rate as an average rate of tax payable by a Group company, calculated as a ratio of the tax expense compared with the profits/losses in the financial statements.

Commentary

- The decrease in the cash tax rate is due to the receipt of prior period refunds in the current financial period. This, together with the impact of high inflation and lower PGM pricing induced by the current macro-economic conditions, has resulted in a significant contraction in profit margins and cash generation, leading to reduction in current year taxes paid
- Consequently, the IFRS effective tax rate reduced by 57% to 16% in the current period.

Three-year tax trend (%)



¹ Relates to overpayment of approximately R1 241 million in the prior year which was largely due to the unexpected and significant reduction in rhodium pricing at year-end and its resultant impact on stock valuations, which have a material impact on the final tax computations.

DETAILED EFFECTIVE TAX RATE RECONCILIATION

For a detailed breakdown of the reconciliation, refer to [www](#) note 9 in the Implats Group consolidated annual financial statements.

The effective tax rate reconciles to the Group tax expense.

	2024 Rm	2023 Rm
(Loss)/profit before tax	(20 426)	9 787
Normal tax at SA tax rate of 27%	(5 515)	2 643
Adjusted for:		
Impairments		
Impairment of goodwill	1 714	–
Impairment and remeasurements of RBPlat at acquisition	–	1 624
Impairment of assets on which no deferred tax was raised	538	348
IFRS 2 Share-based Payment charge on B-BBEE transaction	522	–
Effect of after-tax share of profit from equity-accounted entities	319	(913)
Other net disallowable expenditure and exempt income	200	66
Legislation		
Reversal of deferred tax due to change in legislation	–	(160)
Change in tax rate – Zimbabwean tax	322	–
Prior year adjustment	111	–
Dividends		
Share-based compensation expense – employee share incentive trusts	76	295
Withholding tax on dividends – employee share incentive trusts	18	75
Tax rates of foreign subsidiaries		
Effect of different tax rates of foreign subsidiaries	(108)	(580)
Canadian mining costs – Impala Canada Ontario mining tax deducted at the corporate tax rate	2	211
Withholding taxes on undistributed profits	(1 474)	–
Tax expense	(3 275)	3 609
Effective tax rate	16%	37%

The Group weighted average statutory tax rate is 26.8% (2023: 26.6%) and represents the profits/losses of the Group, multiplied by each jurisdiction's statutory tax rate, ignoring the impact of any tax adjustments.

Outlook

Other reconciling items relate to ordinary operating activities of the Group's operations and the value of future reconciling items of this nature will depend on the earnings in each jurisdiction and dividends declared.

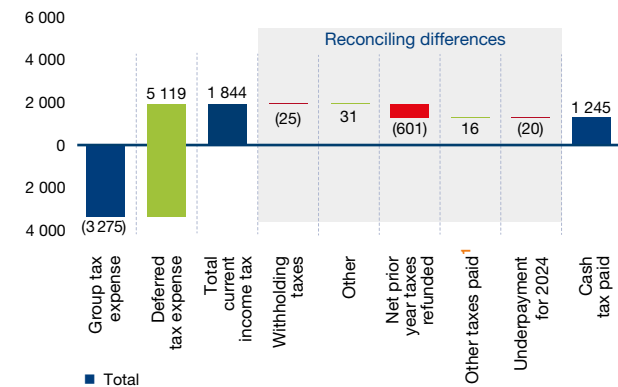
Group tax performance continued

Reconciliation of Group income tax expense to cash tax paid.

The current tax charge consists of the corporate income tax accrued on our 2024 taxable profits, as well as adjustments to the current tax charge accrued in prior years. The current tax charge for a given year is on an accruals basis for accounting purposes, while corporate income taxes are paid in accordance with the relevant tax legislation, resulting in some taxes being paid during the year, and some after year-end.

The difference between the current tax charge and corporate income taxes paid is therefore a result of the phasing of tax payments across several years.

Group income tax expense to cash taxes paid (Rm)



¹ Relates to withholding taxes paid.



Safety briefing underground at Impala Rustenburg

Performance per country

The Group's ongoing contribution to the social, economic and institutional development of our communities, and meaningful engagement with our community stakeholders, is based on legitimate needs identified in a two-way engagement process.

	Total tax contribution		South Africa	Canada	Zimbabwe
	Rm 2023	Rm 2024	Rm 2024	Rm 2024	Rm 2024
Corporate taxes¹	6 012 ²	1 238	1 322	(91)	7
Withholding taxes¹	407	152	28	7	117
Dividends	305	28	28	—	—
Interest	23	7	—	7	—
Contractors	79	117	—	—	117
Payroll taxes	5 263	6 054	4 255	1 089	710
PAYE	4 857	5 615	3 915	1 056	644
UIF	143	157	157	—	—
SDL	155	183	183	—	—
Other	108	99	—	33	66
Indirect taxes	1 334	1 307	987	58	262
VAT/sales tax	1 033	973	915 ³	58	—
Excise and customs duties	292	281	19	—	262
Securities transfer tax	9	53	53	—	—
Property taxes	91	120	79	—	41
Environmental taxes	74	110	89	18	3
Carbon tax	15	28	16	12	—
Fuel levy/duty	56	79	73	6	—
Other	3	3	—	—	3
Other payments to government	2 447	1 261	366	5	890
Royalties	2 133	1 015	324	—	691
Zimbabwean commissions	143	84	—	—	84
Intermediated money tax (Zimbabwe)	92	57	—	—	57
Other	79	105	42	5	58
Total	15 628	10 242	7 126	1 086	2 030

¹ The total cash tax paid in the consolidated annual financial statements and the reconciliation of Group income tax expense to cash tax paid on [page 22](#) differ from the corporate tax paid in this table, as they exclude withholding taxes paid to Implats contractors on imported services, and interest and penalties not related to income tax, which are included above.

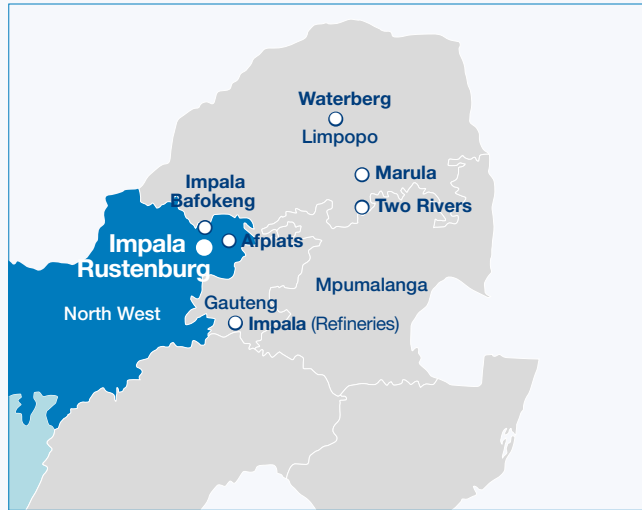
² Includes R1 million income taxes paid by Impala Japan. No taxes were paid by the Company in the current period.

³ Excludes R4.43 billion (2023: R5.47 billion) VAT received, which does not form part of our total tax contribution.

Analysis of the social, financial and economic contributions at the Group's material operational jurisdictions is provided on [pages 24 to 28](#).

Performance per country continued

SOUTH AFRICA



South Africa is home to the majority of our assets and more than 56 000 of our employees. In 2024, our total tax contribution from taxes borne and collected of R7 126 million was paid to the South African government.

Our South African footprint includes our subsidiaries Impala Platinum Limited, comprising the Impala Rustenburg and Impala Refineries operations, as well as the refining division, Impala Refining Services (IRS), Marula and Impala Bafokeng, which was initially consolidated in May 2023. Two Rivers, our equity-accounted associate, is excluded from the consolidated numbers that follow.

Implats' social licence to operate is linked to the wellbeing of our host communities. Our social performance strategy seeks to create self-sustaining and inclusive mine communities through positive social and economic contributions.

In South Africa, our social projects consist of social and labour plan (SLP) initiatives as well as beyond-compliance programmes and donations. All our community social projects are demand-driven and aligned to the communities' needs and the Group's sustainability strategy. Our ESG report has more information on our social performance.

Sharing value with our people and communities

In the current year, a meaningful broad-based black economic empowerment (B-BBEE) transaction was introduced at Impala (including Impala Rustenburg and IRS) and Impala Bafokeng, which included the creation of a community share ownership trust (CSOT) with 4% ownership in both operations. The CSOT includes a broad range of beneficiaries from the mine-host communities and will focus on education and skills development, enterprise development, community wellbeing and social and economic infrastructure. Community ownership will foster a common goal to create sustainable operations for the benefit of all stakeholders. Implats concluded a partnership with Siyanda Resources, through a broad-based empowerment consortium, the Bokamoso Consortium, which purchased a 5% shareholding in the assets of both Impala and Impala Bafokeng. It represents significant empowerment ownership in the Group's South African mining, smelting and refining assets, and expands broad-based ownership in South Africa's PGM sector. Implats is confident that, over time, these structures will provide a solid foundation for sustainable benefits for its people and our communities.

Other socio-economic and environmental contributions

Opportunities are set aside for community entrepreneurs to become suppliers and, subsequent to the acquisition of Impala Bafokeng, a R50 million ESD fund was established for Impala Bafokeng and Impala Rustenburg to address and solve challenges faced by emerging entrepreneurs.

In total, R352 million (2023: R208 million) was spent on social programmes, including school support programmes, clinics and community infrastructure. We procured goods and services worth R4.2 billion from suppliers in the communities closest to our South African operations (2023: R2.0 billion), with R1.9 billion spent at Impala Rustenburg (2023: R1.8 billion), R2 billion at Impala Bafokeng and R394 million at Marula (2023: R159 million), representing 19% of our discretionary spend (2023: 13%).

To meet its environmental obligations, the Group has invested sufficient funds into short-term insurance policies to fund rehabilitation liability provisions for all South African operations, which are, over time, expected to result in fully funded guarantees at the end of life-of-mine (refer to note 16 of the consolidated annual financial statements).

Performance per country continued

ECONOMIC VALUE DISTRIBUTION¹

	2024 Rm	2023 Rm
Revenue	66 416	97 773
Other net income	1 148	2 116
Gross value generated	67 564	99 889
Depreciation	(4 964)	(3 633)
Deferred tax	365	508
	62 965	96 764
Value distributed to stakeholders		
Employees and contractors		
Labour and other	(21 972)	(17 821)
IFRS 2 share-based payment charge on B-BBEE transaction – IBR ESOT ³	(274)	–
Communities, suppliers and business partners		
Cost of sales – other ²	(35 485)	(63 548)
IFRS 2 share-based payment charge on B-BBEE transaction – IBR and Impala CSOT, and Bokamoso Consortium ³	(1 658)	–
Governments		
State royalties	(391)	(1 129)
Direct state taxes	(2 028)	(4 467)
Lenders		
Finance costs	(283)	(102)
Shareholders		
Dividends paid to shareholders	(1 487)	(12 466)
Diminution of shareholder value	613	2 769
Number of employees		
Employees and contractors	56 662*	59 962

¹ Numbers were prepared on the accrual and headline earnings basis and in the same manner as those of the operating segments disclosed in note 1 of the consolidated Group annual financial statements. The South African value added statement includes Implats' South African mining segments, the holding company, its other investments as well as Impala Japan.

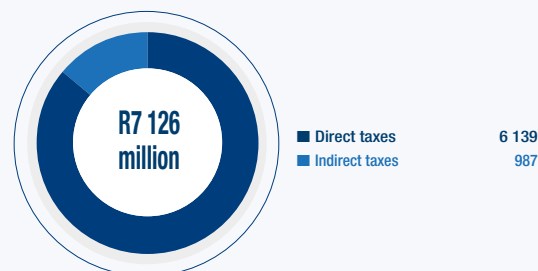
² Includes non-state royalties of R419 million (2023: R404 million) and carbon taxes of R17 million (2023: R16 million).

³ Refer to note 24 of the consolidated annual financial statements for additional information.

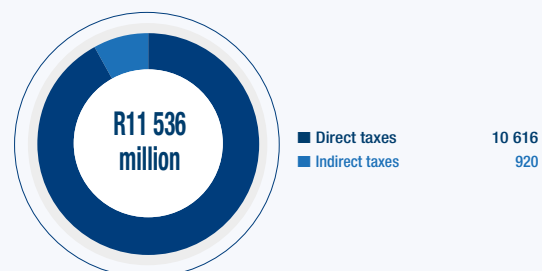
* Includes four employees at Impala Japan.

Taxes borne and taxes collected on behalf of governments

Taxes borne and collected FY2024 (Rm)



Taxes borne and collected FY2023 (Rm)



Total tax incentives: R58 million (2023: R25 million) Learnership agreements tax incentive: R42 million (2023: R9 million)

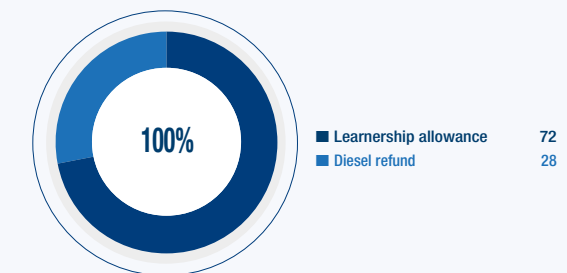
The learnership allowance is a tax incentive in South Africa designed to encourage employers to invest in the training and development of their employees through registered learnership agreements. The Group claimed R42 million and received a tax benefit of R11 million (2023: R34 million and R9 million, respectively).

Diesel refund system: R16 million (2023: R16 million)

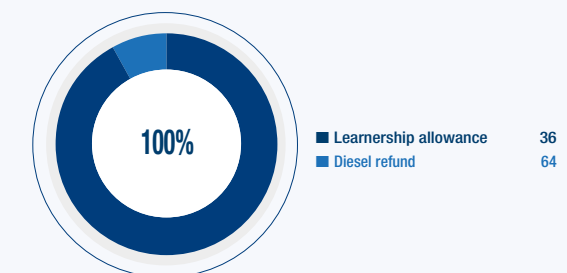
This cash rebate on diesel fuel used is available to registered VAT vendors operating in the agriculture, forestry, fishing and mining sectors.

The incentive strengthens the competitiveness of local industries internationally and reduces the road-related tax burden of the Road Accident Fund levy for particular non-road users participating in defined industries or activities.

Tax incentives by tax type FY2024 (%)



Tax incentives by tax type FY2023 (%)



Performance per country continued

ZIMBABWE



Our footprint in Zimbabwe comprises Zimplats and our joint venture, Mimosa.

Zimplats is 87%-owned by Implats. Its Ngezi operation is located on the Hartley Geological Complex on the Zimbabwean Great Dyke, approximately 150 kilometres south-west of Harare. The Hartley Geological Complex contains 80% of the known PGM resources in Zimbabwe. Mimosa, an equity-accounted joint venture, is excluded from the consolidated numbers in the Group AFS used to compile the economic value distributed below.

In 2024, Zimplats' total tax contribution of taxes borne and collected of R2 030 million was paid to the Zimbabwean government.

Zimplats is committed to making a meaningful contribution to Zimbabwe's economy. Its empowerment plan was approved by the Zimbabwean government in 2022, after which Zimplats issued equity in its empowerment companies to a CSOT. Future dividends declared by these companies to the CSOT are committed to ensuring that communities realise tangible benefits from their ownership in these companies. Zimplats also works with local communities to build an inclusive economy that provides opportunities for social mobility, facilitated by equitable access to jobs, education and health.

Zimplats' procurement plays a pivotal role in its value chain and makes a significant impact in Zimbabwe's economy through its expenditure on local enterprise development programme and related import substitution. The company spent R13 billion (US\$698 million) on procurement, including capital expenditure, for the year (2023: R13 billion (US\$742 million)), 51% of which was local in-country spend of R7 billion (US\$356 million) (2023: R6 billion (US\$ 350 million)).

ECONOMIC VALUE DISTRIBUTION¹

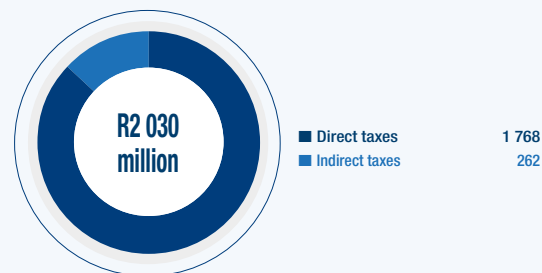
	2024 Rm	2023 Rm
Revenue	14 402	18 047
Other net expenses	(742)	(279)
Gross value generated	13 660	17 768
Depreciation	(2 219)	(1 940)
Deferred tax	945	(1 077)
	12 386	14 751
Value distributed to stakeholders		
Employees and contractors		
Labour and other	(3 115)	(2 928)
Communities, suppliers and business partners		
Cost of sales – other	(6 843)	(6 149)
Governments		
State royalties	(696)	(674)
Direct state taxes ²	(21)	(369)
Lenders		
Finance costs	(41)	(11)
Shareholders		
Dividends to shareholders	(1 637)	(3 933)
Value retained in the business	(33)	(687)
Number of employees		
Employees and contractors	8 857	9 021

¹ Numbers were prepared on an accrual and headline earnings basis and in the same manner as those of the operating segments disclosed in note 1 of the consolidated Group annual financial statements. Includes Guernsey and the United Kingdom country-by-country performance (refer to [page 31](#)).

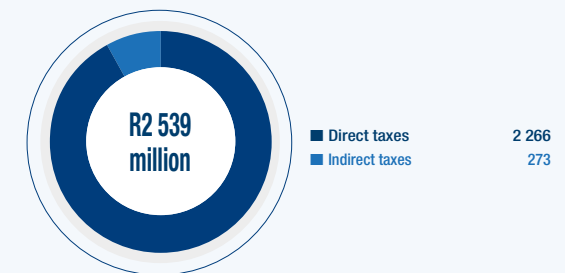
² Includes withholding taxes.

Taxes borne and taxes collected on behalf of governments

Taxes borne and collected FY2024 (Rm)



Taxes borne and collected FY2023 (Rm)



Performance per country continued

CANADA



Impala Canada is 100%-owned by Implats. The Lac des Iles Mine, Impala Canada's single-operating asset, is located in the province of Ontario, north of the city of Thunder Bay. Lac des Iles conducts underground and surface mining, as well as concentrating. In 2024, Impala Canada's total tax contribution of taxes borne and collected of R1 086 million was paid to the Canadian government.

Impala Canada's community investment programmes are focused on the local Thunder Bay community, situated 90km from the mine. Approximately half of the Company's workforce is from this area and Impala Canada is committed to the long-term sustainability of the city and wellbeing of its community.

In the current period, the operation spent R5 million (2023: R9 million) on social programmes. Impala Canada is committed to finding and working with the best suppliers and service providers. The spend with indigenous suppliers was R635 million or 15% of total discretionary spend (2023: R637 million or 15% of total discretionary spend).

ECONOMIC VALUE DISTRIBUTION¹

	2024 Rm	2023 Rm	
Revenue	5 580	7 502	
Other net expenses	(140)	(169)	
Gross value generated	5 440	7 333	
Depreciation	(851)	(2 114)	
Deferred tax	12	442	
	4 601	5 661	
Value distributed to stakeholders			
Employees and contractors	Labour and other	(1 721)	(1 803)
Communities, suppliers and business partners	Cost of sales – other ²	(3 096)	(2 998)
Governments	Direct state taxes	205	(348)
Lenders	Finance costs ³	(281)	(242)
Shareholders	Diminution of value/(value retained in the business)	292	(270)
Number of employees			
Employees and contractors	734	948	

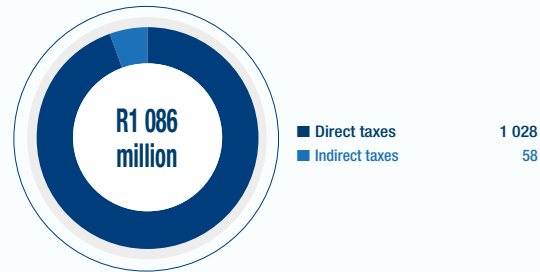
¹ Numbers were prepared on an accrual and headline earnings basis and in the same manner as those of the operating segments disclosed in note 1 of the consolidated Group annual financial statements.

² Includes non-state royalties of R245 million (2023: R331 million) and carbon taxes of R12 million (2023: R8 million).

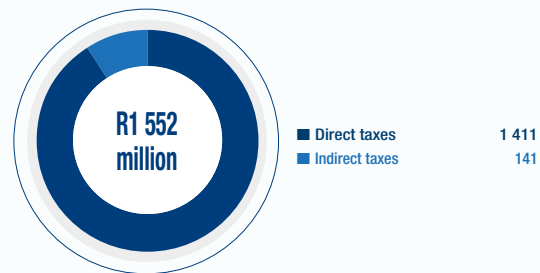
³ Includes R266 million (2023: R231 million) interest on an intercompany loan with Implats.

Performance per country continued

Taxes borne and collected FY2024 (Rm)



Taxes borne and collected FY2023 (Rm)



Total tax incentives: R4.1 million (2023: R59.3 million) Manufacturing and processing credit: Rnil (2023: R17.1 million)

A reduced corporate tax rate on Canadian manufacturing and processing profits is applied to corporations that manufacture or process goods for sale or lease in Canada.

The manufacturing and processing credit reduces Impala Canada's provincial tax rate from 11.5% to 10.0% and the total corporate tax rate from 26.5% to 25.0%.

There was no manufacturing and processing credit in the current year as Impala Canada was in a taxable loss position for corporate taxes and had no taxes payable.

Deduction for Ontario mining taxes paid: R4.1 million (2023: R42.1 million)

The Canadian tax system provides for both the federal and provincial governments to levy corporate income taxes. The Canada Income Tax Act allows for a full deduction of provincial royalties and mining taxes of 10% payable on the extraction of minerals in the Ontario Province when calculating the federal income tax liability.

Cooperative education tax credit: Rnil (2023: R0.1 million)

A refundable tax credit is available to employers who hire students enrolled in a cooperative education programme at an Ontario university or college.

The tax credit is based on salaries and wages paid to students in a cooperative education work placement. Corporations claim 25% of eligible expenditures limited to a maximum of C\$3 000 for each work placement. Impala Canada did not have eligible cooperative education students in the current year and therefore received no tax credits in FY2024.



Impala Canada's single-operating asset is located in the province of Ontario, north of the city of Thunder Bay



Appendices

30	Analysis of data by country
33	Our legal entities
35	Glossary and key terms
36	Contact details and administration

Analysis of our data by country

BASIS OF PREPARATION

In this report, we disclose our analysis of data by country for the jurisdictions in which we have a taxable presence and where we report financial data.

The information included in this section is based on the country-by-country reporting requirements of the Global Reporting Initiative's Sustainability Reporting Standard on Tax (GRI 207). Additionally, Implats, as the ultimate parent entity, submits annual country-by-country reporting documentation, prepared in accordance with the OECD guidelines, to SARS.

Implats has used the International Financial Reporting Standards (IFRS) data and the South African rand as the reporting currency. The main data source is the consolidated Group reporting system, as well as the audited consolidated annual financial statements. Reliance is also placed on data from individual subsidiaries for specific items. The financial information taken from our consolidated Group reporting system is assured internally by the Implats combined assurance map and Implats' internal financial controls.

REVENUE

The revenue reported in our audited consolidated financial statements excludes dividends, interest and other non-sector specific sources of income that are disclosed separately in the consolidated income statement.

Revenue from intra-group transactions refers to revenue from transactions with fellow Implats subsidiaries.



35MW solar photovoltaic (PV) installation at Zimplats

Analysis of our data by country continued

FY2024 COMMENTARY

Group subsidiaries, Zimplats and Marula, sell inventory concentrate and/or matte to IRS for further refining. Intra-group revenue from sales by the South African operations to IRS has been excluded from intra-group revenue from other jurisdictions. The revenue from sales to third parties is earned in South Africa.

The Group provisional tax payments are made as accurately as possible prior to each year-end. Movements in metal prices, exchange rates and stock levels after year-end can, however, significantly influence the valuation of financial liabilities and inventory. This gives rise to differences between the provisional taxes paid and the tax accrued in the annual financial statements, which is re-calculated based on information available at the end of the financial year (refer to the Group income tax expense to cash taxes paid reconciliation on [page 22](#)).

Tangible assets exclude financial assets and certain items included in property, plant and equipment, namely, right-of-use assets, mining rights and rehabilitation assets.

South Africa

The effective tax rate of 11.16% (2023: 40.0%) compared to the legislative rate of 27% (2023: 27%) was largely due to operational losses, the impairment of goodwill and the IFRS 2 B-BBEE compensation charge which are not tax deductible.

The taxes paid mainly relate to mining, smelting, refining and selling PGMs and base metals.

Zimbabwe

The effective tax rate of (121.01)% (2023: 24.0%) compared to the legislative rate of 25.75% was mainly due to the deferred tax on undistributed profits which is recognised on the lower of the post-acquisition increase in net asset value and the expected dividend forecast per the approved business plan.

The taxes paid mainly relate to mining and smelting operations.

Guernsey

Both the corporate and effective tax rates in Guernsey are 0%; however, dividend taxes borne are withheld and paid in Zimbabwe.

Canada

The effective tax rate in Canada is 10.67% (2023: 28%) due to the impairment of assets.

The taxes paid mainly relate to mining operations.

Japan

The statutory tax rate in Japan is 34%, with an effective tax rate of 50.77% (2023: 17%) due to disallowable expenditure. The total tax contribution mainly consists of corporate income tax.

Analysis for Implats Group at 30 June 2024

Jurisdiction ¹	Revenue			Tax rates						
	Third-party revenues ² Rm	Revenues from intra-group transactions with other tax jurisdictions Foreign Rm	Profit/(loss) before tax ² Rm	Income tax paid (on cash basis) [*] Rm	Income tax accrued – current year ^{**} Rm	Tangible assets (excluding cash and cash equivalents) ³ Rm	Balance of inter-company debt held by entities in jurisdiction ⁴ Rm	Employees number	Statutory %	Effective %
South Africa	80 818	–	(19 022)	1 331	2 026	48 815	(3 581)	56 658	27	11.16
Zimbabwe	–	14 402	764	7	21	36 458	111	8 857	25.75	(121.01)
Guernsey	–	–	(16) ⁵	–	–	83	–	–	0	0
United Kingdom	–	–	(1)	–	–	–	(20)	–	19	0
Canada	5 580	–	(2 155)	(93)	(205)	1 007	3 490	734	25 ⁶	10.67
Japan	–	18	4	–	2	–	–	4	34	50.77
	86 398	14 420	(20 426)	1 245	1 844	86 363	–	66 253		

¹ Refer to [pages 24 to 28](#) and [pages 33 and 34](#) of this report for additional information on the primary operations and legal entities in these jurisdictions.

² Total reconciles to the consolidated annual financial statements. Refer to note 1 for additional segment information.

³ Tangible assets comprise property, plant and equipment, investment property and inventory.

⁴ The interest rate paid on the debt is calculated on market-related terms depending on the nature of the debt.

⁵ Relates to dividends that are subject to 15% withholding taxes in Zimbabwe.

⁶ In addition to the 25% corporate tax paid in Canada, an additional 10% Ontario mining tax is payable. The effective tax rate reconciliation in the consolidated annual financial statements was performed by disclosing the special mining tax as a reconciling item.

^{*} Total reconciles to the current tax expense in note 21 of the consolidated annual financial statements.

^{**} Total reconciles to the current tax expense in note 9 of the consolidated annual financial statements.

Analysis of our data by country continued

Analysis for Implats Group at 30 June 2023

Jurisdiction ¹	Revenue					Tangible assets (excluding cash and cash equivalents) ³	Balance of inter-company debt held by entities in jurisdiction ⁴	Employees Number	Tax rates	
	Third-party revenues ²	Revenues from intra-group transactions with other tax jurisdictions	Profit/(loss) before tax ²	Income tax paid (on cash basis)	Income tax accrued – current year				Statutory %	Effective %
	Rm	Foreign*	Rm	Rm	Rm	Rm	Rm			
South Africa	99 092	—	12 276	5 616	4 526	55 187	(3 410)	59 958	27	40
Zimbabwe	—	18 047	6 010	491	369	31 736	(135)	9 021	24.72	24
Guernsey	—	—	1 554 ⁵	—	—	89	—	—	0	0
United Kingdom	—	—	(1)	—	—	—	20	—	19	0
Canada	7 502	—	(10 052)	311	348	2 547	3 525	948	25 ⁶	28
Japan	—	18	—	1	—	—	—	4	34	17
	106 594	18 065	9 787	6 419	5 243	89 559	—	69 931		

¹ Refer to [pages 24 to 28](#) and [pages 33 and 34](#) of this report for additional information on the primary operations and legal entities in these jurisdictions.

² Total reconciles to the consolidated annual financial statements. Refer to note 1 for additional segment information.

³ Tangible assets comprise property, plant and equipment, investment property and inventory.

⁴ The interest rate paid on the debt is calculated on market-related terms depending on the nature of the debt.

⁵ Relates to dividends which are subject to 15% withholding taxes in Zimbabwe.

⁶ In addition to the 25% corporate tax paid in Canada an additional 10% Ontario Mining tax is payable. The effective tax rate reconciliation in the consolidated annual financial statements was performed by disclosing the special mining tax as a reconciling item.

* Restated to include the intercompany revenue from Impala for marketing services rendered.



Panoramic view of Impala Bafokeng operations

Our legal entities

OUR LEGAL ENTITIES: TAX JURISDICTION AND NATURE OF BUSINESS

South Africa

Name of entity	Main business activity
Afplats (Pty) Ltd	Mining activities
Bafokeng Rasimone Platinum JV Environmental Rehabilitation Trust	Environmental rehabilitation services
Biz Afrika 1866 (Pty) Ltd	Dormant
Gazelle (Pty) Ltd	Investment holding activities
Imbasa Platinum (Pty) Ltd	Exploration activities
Impala Bafokeng Platinum (Pty) Ltd	Investment holding activities
Impala Bafokeng Platinum Management Services (Pty) Ltd	Management services
Impala Bafokeng Rasimone Management Services (Pty) Ltd	Employee-related and management services
Impala Bafokeng Resources (Pty) Ltd	Mining activities
Impala Bafokeng Resources Properties (RF) (Pty) Ltd	Holding and management of properties
IBR ESOT (Pty) Limited	Investment holding activities
IBR Employee Share Ownership Trust	Investment holding activities for employees
Impala Chrome (Pty) Ltd	Chrome processing activities
Impala Employee Share Ownership Trust	Investment holding activities for employees
Impala Community Development Trust (Education)	Dormant
Impala Community Development Trust (Community Development)	Dormant
Impala Holdings Limited	Investment holding activities
Impala Platinum BV	Investment holding activities
Impala Platinum Holdings Limited	Investment holding activities
Impala Platinum Holdings Share Trust	Dormant
Impala Platinum Investments (Pty) Ltd	Investment holding activities
Impala Platinum Limited	Mining activities
Impala Platinum Properties North West (Pty) Ltd	Holding and management of properties
Impala Platinum Properties Rustenburg (Pty) Ltd	Holding and management of properties
Impala Pollution, Rehabilitation and Closure Trust Fund	Dormant
Impala Platinum Zimbabwe (Pty) Ltd	Investment holding activities
Impala Refining Services Limited	Management services
Implats Share Incentive Trust	Dormant
Inkosi Platinum (Pty) Ltd	Exploration activities
Marula Platinum (Pty) Ltd	Mining activities
Micawber 399 (Pty) Ltd	Dormant
Marula CT Company (Pty) Ltd	Investment holding activities for community empowerment
Marula Employee Share Ownership Trust	Investment holding activities for employees
Marula ESOT Company (RF) (Pty) Ltd	Investment holding activities
Maseve Investment 11 (Pty) Ltd	Dormant (in the process of deregistration)
The Morokotso Trust	Dormant (in the process of deregistration)

Our legal entities continued

Zimbabwe

Name of entity	Main business activity
Always Investments (Private) Ltd	Dormant
Duckbrooke Mine (Private) Ltd	Dormant
Hartley Minerals Zimbabwe (Pty) Ltd	Leasing activities
Hartley Platinum Mines (Private) Ltd	Dormant
Jalta Investments (Private) Ltd	Dormant
Matrep Investments (Private) Ltd	Dormant
Ngezi Platinum Limited	Dormant
Zimplats Corporate Services (Private) Ltd	Dormant
Zimplats Enterprises (Private) Ltd	Investment holding activities
Zimbabwe Platinum Mines (Private) Ltd	Mining activities

Guernsey

Name of entity	Main business activity
Zimplats Holdings Limited	Investment holding activities

Zimplats Holdings Limited is the holding company of the Zimplats Group. It is a public company domiciled in Guernsey and listed on the Australian Stock Exchange.

United Kingdom

Name of entity	Main business activity
Mhondoro Holdings Limited	Investment holding activities

Mhondoro Holdings Limited is a subsidiary of Zimplats and is registered in the United Kingdom. The principal activity of the company is that of an intermediate holding company for mining interests in the Zimplats Group.

Canada

Name of entity	Main business activity
Impala Canada Limited	Mining activities

Japan

Name of entity	Main business activity
Impala Platinum Japan Limited	Marketing activities

Impala Platinum Japan is a Japan-registered company that provides marketing and client liaison services to the Group.

Glossary and key terms

Carbon credits	Carbon credits represent a unit of measurement for greenhouse gas emissions reductions or removals. Carbon credits enable entities to offset their own emissions by investing in ventures that reduce or remove greenhouse gases from the atmosphere.
Carbon tax	A carbon tax is a fee for the number of emissions companies create. These taxes increase the cost of using fossil fuels and other activities that produce emissions, and thus incentivise companies to become more energy efficient.
Effective tax rate	The effective tax rate is the amount of tax expense attributable to a year as a proportion of profit before tax.
Indirect taxes	Include value added/sales taxes, customs and excise duties, securities transfer tax (STT).
Other payments to government	Include royalties, licence fees and permit fees.
Property taxes	Include taxes levied on the acquisition, disposal, ownership or use of tangible property.
Environmental taxes	Include taxes and duties levied on the supply, use or consumption of goods or services, which are potentially harmful to the environment.
Taxes accrued	This is the amount of corporate tax accruing in our financial reporting period. It comprises normal tax, withholding taxes and foreign taxes. This amount reconciles with the tax paid in the Implats Group consolidated financial results.
Taxes borne	All the taxes levied on a company, which are a cost to it and affect its results. These include corporate income tax, employer contributions and taxes on occupation of property. Taxes borne are a company's direct contribution to tax revenues.
Taxes collected	Taxes that are administered and collected on behalf of government and include employee income tax, and other deductions administered through the payroll, as well as value added tax charged to customers. Taxes collected are generated by a company's business activity and are part of its indirect contribution to tax revenues.
Taxes paid	Taxes paid (on a cash basis) include taxes and refunds paid and received respectively for prior, current and future years, withholding taxes and taxes on dividends. It does not include withholding taxes on dividends paid to shareholders. This amount reconciles with the taxes paid in the Implats Group consolidated financial results.
Total tax contribution	The total tax contribution is the sum of a company's corporate income tax and other relevant business taxes. It draws a distinction between business taxes borne by the company itself and business taxes collected on behalf of governments.

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