

Anglo American ICMM Performance Expectations Self-Assessment Declaration

Operating year 2022

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Introduction

Increasing consumer expectations about the sustainability footprint of the products they buy is driving growing demand for responsibly sourced products, from food and clothing to consumer electronics and vehicles. Mined metals and minerals – and the products that they enable – are no exception to this trend. As a leading global mining company, we have been at the forefront of developing and adopting some of the most trusted sustainability certification programmes for the mining sector, including the Initiative for Responsible Mining Assurance (IRMA) and the Responsible Jewellery Council (RJC).

Anglo American’s approach to sustainability is guided by our Purpose of “re-imagining mining to improve people’s lives” and is detailed in our ambitious Sustainable Mining Plan. The plan’s critical foundations and its series of stretch goals ensure that our strategic progress and business performance are designed to deliver enduring value for the full breadth of our stakeholders.

In 2022, Anglo American also undertook self-assessments at all qualifying operating sites to review conformance against the International Council on Mining and Metals Performance Expectations (ICMM PEs).

Background

Anglo American is a founding member of the ICMM, a leadership organisation working for a safe, just and sustainable world that is enabled by responsibly produced minerals and metals. ICMM members are required to measure performance against the ten [ICMM Principles](#), the Position Statement commitments and the Performance Expectations (together the mining principles framework). Member companies are also required to report in line with the Global Reporting Initiative's sustainability reporting standards.

The objective of mining standards are to set minimum requirements for responsible mining, while encouraging continuous improvement over time. External validation of performance gives additional credence that a mining company's disclosures are consistent and transparent.

The ICMM PEs require an annual disclosure of performance in line with the [ICMM Assurance and Validation procedure](#). The process is comprised of the following:

Self-assessments of all operations subject to PE validation

- Confirmation of the existence and integrity of systems and/or practices relating to implementation of the PEs, to the extent that they are applicable.

Prioritisation of operations for third-party validation

- A prioritisation process to determine the sequence the operations will be subject to third-party validation in the subsequent three-year validation cycle.

Third-party validation

- Independent validation of the reasonableness and authenticity of statements made in self-assessments. This process will be conducted by qualified validation service providers (VSPs). VSPs must meet ICMM requirements for independence, experience, expertise and lack of conflicts of interest.

Disclosure

- Annual public disclosure of PE validation activities. This can be published on a member's website or in a sustainability or corporate report.

The possible outcomes for the validation of an individual PE are 'Meets', 'Partially Meets', 'Does not Meet' and 'Not Applicable' as defined below:

- Meets: Systems and/or practices related to the PE have been implemented and there is sufficient evidence that the intent of the PE is being met. However, opportunities for improvement may still remain.
- Partially Meets: Systems and/or practices related to meeting the intent of the PE have been only partially implemented. There are gaps that may contribute to an inability to meet the intended outcome of the PE, or insufficient evidence can be provided to demonstrate that the activity is aligned to the intent of the PE.
- Does not Meet: Systems and/or practices required to support the core intent of the PE are not in place, are not being implemented or cannot be evidenced. Once the list of prioritised operations for third-party validation is complete, members will schedule the validation at times that are suitable for their organisation within the three-year cycle.
- Not Applicable: The PE is judged to not apply to an operation.

Once the list of prioritised operations for third-party validation is complete, members will schedule the validation at times that are suitable for their organisation within the three-year cycle.

Our Approach

To make use of existing third party assurance activities, and to avoid duplication of work at sites, we assessed our compliance with the Performance Expectations based on assurance work already conducted where possible. We used assurance work conducted for third party sustainability standards (such as Responsible Jewellery Council and Initiative for Responsible Mining Assurance) and our own internal standards (such as the Social Way). Where there were gaps in coverage of requirements Anglo American Group-level specialists interviewed site teams. While some of the standards we use are more detailed or stringent than the Performance Expectations, for consistency we have assessed our compliance using findings for the other standards. For example, if a site partially met our Social Way requirements on an issue covered by the Performance Expectations we recorded the site as partially meeting the corresponding ICMM requirement. By 2025, in line with our commitments in our Sustainable Mining Plan, all of our managed mining operations are planned to be third party assured against recognised responsible mining standards and we intend to integrate assurance against the ICMM Performance Expectations into these audits to provide full third-party coverage.

Prioritisation

Prioritisation of sites to conform with the ICMM PEs will align with our prioritisation process to certify our mine sites in line with our IRMA / RJC / Copper Mark and other mine certifications. Sites are prioritised according to strategic initiatives as well as our own internal processes for risk and materiality assessments of each site.

As some sites have already undergone their IRMA / RJC / Copper Mark certifications, we will align the ICMM PE validations with their surveillance or recertification audits. We intend to 3rd party assess all sites against the ICMM PEs as part of the audit programme for delivering on our SMP public commitment to have all our operations assured against recognised responsible mining standards.

Self-Assessment Status

After a self-assessment, third-party validation of those results should occur within a three-year window. A third-party validation will then occur once every three years, for each operation. As noted above, Anglo American will commence external validation of the ICMM PEs in the 2023 reporting cycle.

During 2022 all eligible Anglo American operations completed their self-assessments. Quellaveco was commissioned in mid-2022 and will be included in the next round of self-assessments.

Detailed Disclosure of Self-Assessment Results

The detailed disclosure of the operational results of the self-assessments against the ICMM PEs is depicted on the next page.

KEY: ● Meets ◐ Partially meets ○ Doesn't meet ⊗ N/A

ICMM PERFORMANCE EXPECTATIONS Description	BASE METALS					PGMs						GROUP	COMMENT
	NICKEL		COPPER			Amandelbult	Mototolo	Unki	Rustenburg	Mogalakwena	Polokwane		
	Barro Alto	Codemim	Los Bronces	El Soldado	Chagres								
Principle 1: Ethical Business													
1.1 Establish systems to maintain compliance with applicable law	●	●	●	●	●	●	●	●	●	●	●	●	
1.2 Implement policies and practices to prevent bribery and corruption, and to publicly disclose facilitation payments	●	●	●	●	●	●	●	●	●	●	●	●	
1.3 Implement policies and standards consistent with the ICMM policy framework	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Whilst many of Anglo American's policies and standards are aligned with the ICMM Principles, specific references are not yet explicit in all policies and standards. An action has been raised in our action management system to address this with a target completion date of H2, 2023.
1.4 Assign accountability for sustainability performance at the Board and/or Executive Committee level	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	The Board of Anglo American is responsible for approving the company's policies in respect of safety, health and the environment; human rights; social performance and statement on modern slavery; and the Code of Conduct amongst others. It is further responsible for approval of any matters that have significant reputational, social or environmental implications for the Group. The Board's Sustainability Committee is responsible for overseeing Group level policies, processes and strategies designed to manage safety, health, environment, socio-political and supply chain (together "sustainable development") risks; to achieve compliance with sustainable development responsibilities and commitments; and to strive to be a global leader in sustainable mining.
1.5 Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Our Business Integrity Policy and Code of Conduct expressly prohibit political donations. Our Business Integrity procedures further describe mechanisms to manage instances where political donations may be implied as well as the political involvement by individuals who are employees of the Company.
Principle 2: Decision Making													
2.1 Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments in the design, operation and closure of facilities	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Sustainable development principles are embedded in the Innovation pillar of our strategy, via our FutureSmart Mining™ programme, which includes our ambitious Sustainable Mining Plan. Full details of which are available on our website. Our suite of Group level policies clearly state the requirement for sustainable development principles (or relevant sub-discipline principles) to be applied across the mining lifecycle.
2.2 Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices and by joint venture partners, suppliers and contractors, based on risk	●	●	●	●	●	◐	◐	●	◐	◐	◐	●	Our Responsible Sourcing Standard drives our expectations of suppliers and contractors in respect of sustainable development performance. Contractor Performance Management policies and standards are in development across the Group to ensure that responsible sustainable development practices are adopted by our business partners. Where Anglo American is not the managing partner in a joint venture undertaking, it is our policy to seek opportunities to influence the management practices in place at these sites in alignment with our own policies and standards.

KEY: ● Meets ○ Partially meets ○ Doesn't meet ⊗ N/A

ICMM PERFORMANCE EXPECTATIONS Description	BASE METALS					PGMs						GROUP	COMMENT	
	NICKEL		COPPER			Amandelbult	Mototolo	Unki	Rustenburg	Mogalakwena	Polokwane			
	Barro Alto	Codemin	Los Bronces	El Soldado	Chagres									
Principle 3: Human Rights														
3.1 Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to	○	●	●	●	●	○	○	●	○	○	○	○	●	Commitments to our support for the UN Guiding Principles on Business and Human Rights are articulated in our Code of Conduct and Human Rights Policy and detailed further in our Social Way. Work is continuing through our Social and Human Rights Impact Assessment (SHIRA) process to fully identify and remediate potential human rights impacts and better include potentially affected stakeholders in our processes.
3.2 Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve likelihoods and standards of living of displaced people	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	⊗	○	⊗	⊗	⊗	The Social Way Policy mandates the application of the mitigation hierarchy in respect of involuntary resettlements. Land Access and Displacement Strategies are required where resettlement cannot be avoided. Where sites are not yet fully compliant with this PE, work is in progress to close out historic resettlements including addressing livelihood and cultural heritage considerations. Processes to improve and document upfront analyses of project alternatives are also being refined where required.
3.3 Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights	○	●	●	●	●	○	○	●	○	○	○	○	⊗	Anglo American is a signatory to the Voluntary Principles on Security and Human Rights. Our SHIRA process is used to identify areas where security risks may exist. These risk assessments are routinely reviewed and improved where deficiencies have been identified. Actions to improve performance include further inclusion of community and vulnerable groups in our assessment processes and in the development of mitigation strategies where these may be required.
3.4 Respect the rights of workers by: not employing child or forced labour; avoiding human trafficking; not assigning hazardous/ dangerous work to those under 18; eliminating harassment and discrimination; respecting freedom of association and collective bargaining; and providing a mechanism to address workers grievances	●	●	●	●	●	○	●	●	○	○	○	○	●	We adopt the International Labor Organisation's fundamental labour rights which includes respecting the right of association and collective bargaining and a zero tolerance approach to forced or bonded labour, child labour and unfair discrimination. In the host countries where we operate, these rights are also established in law. We have a grievance mechanism, Your Voice, which is available for employees and contractors to raise grievances. At some sites, behavioural and operational culture changes are required to ensure full compliance with our policies and standards. Increased utilisation of Your Voice by our business partners is also desired. In some jurisdictions, the potential use of fraudulent identity documents during the recruitment process is a challenge.
3.5 Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits	●	●	●	●	●	●	●	●	●	●	●	●	●	Our sites adopt local, national or industry level requirements in the determination of working hours, wages and benefits. Group policies do not currently specifically address these aspects. Where applicable, working conditions and wages are determined in line with collective agreements that exist between Group companies and labour unions. Compensation for overtime worked at Barro Alto is being revisited as are some aspects of the collective agreement in place at some of our PGM sites.
3.6 Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts; and deliver sustainable benefits for Indigenous Peoples	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Respect for the rights, interests and perspectives of Indigenous Peoples is a requirement of our Code of Conduct. Sites give effect to this through implementation of the Social Way requirements.
3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage, and capture the outcomes of engagement and consent processes in agreements	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Our sites are required to demonstrate that Indigenous Peoples affected by our activities have provided Free, Prior and Informed Consent for new activities or amendments to existing activities on lands and territories or with respect to significant adverse impacts on Indigenous Peoples and/or critical cultural heritage resources. This is governed by our Social Way in accordance with the International Council on Mining and Metals (ICMM) Position Statement and Good Practice Guide on Indigenous Peoples and Mining (2013).
3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace	○	●	●	●	●	○	○	●	○	○	○	○	○	We promote an inclusive environment where every colleague is valued and respected for who they are in a workplace that is free of discrimination. At a Group level, we have yet to specifically reference objective criteria for recruitment and compensation in our Group Human Resources Policy. At a site level, controls that ensure employment decisions are not made on the basis of personal characteristics are being improved, as is monitoring of business partner employment decisions. At some sites, behavioural culture changes are required to address instances of intimidation of female employees and availability of facilities for women require improvement.

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Principle 4: Risk Management													
4.1 Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results	●	◐	●	●	●	◐	●	◐	●	●	●	●	The requirement to undertake environmental and social impact assessments is driven by legislation in the jurisdictions in which we operate. Improvements are required at some sites to demonstrate how views of stakeholders have been considered in the project design phases including in the determination of mitigation measures.
4.2 Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict Affected and High Risk Areas, when operating in, or sourcing from, a conflict-affected or high-risk area	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	Anglo American does not currently have any active operations in countries that are considered Conflict-Affected and High-Risk in terms of the OECD Due Diligence Guidance.
4.3 Implement risk-based controls to avoid/prevent, minimise, mitigate, and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system	●	●	●	●	●	◐	◐	◐	◐	◐	◐	◐	Sites implement management systems in line with the requirements of our SHE Way which is aligned with recognised international risk management practices. Sites obtain external certification for their safety and health, environmental and social management systems and act on findings, where applicable, in pursuit of continuous improvement.
4.4 Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice	◐	●	●	●	●	●	◐	◐	◐	◐	◐	◐	Emergency Preparedness and Response Plans are developed at site level to address emergencies specific to the context of the site. These must be tested on a regular basis and improvements to the plans made as required. The involvement of communities in the development and testing of these plans is not undertaken consistently across the Group at this time.
Principle 5: Health and Safety													
5.1 Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system	◐	◐	●	●	●	●	●	●	●	●	●	●	Our SHE Way establishes the requirements of a SHE management system that includes the identification, assessment, elimination, control and monitoring of health and safety hazards and occupational diseases utilising our Operational Risk Management approach. In some instances the quality of the risk assessments, completeness in terms of coverage of the full scope of activities and quality of associated management plans are being improved.
5.2 Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures	◐	●	●	●	●	●	●	●	●	●	●	●	Training needs are identified in line with the requirements of the SHE Way and executed accordingly. Occupational exposure limits are identified and monitoring of exposures is undertaken. Improvements in progress include specifying protocols when exposures exceed the OEL, ensuring that training undertaken is effective and that employees are sufficiently knowledgeable to manage all risks to which they may be exposed.

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Principle 6: Environmental Performance																
6.1 Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised	○	○	●	●	○	○	○	○	○	○	○	○	●	Mine closure plans and associated financial estimates are prepared at each site in line with Anglo American standards and local legal requirements. A range of financial provision instruments exists across the Group. Actions are in place to improve the robustness of these plans and estimates in some instances as well as better consultation with and engagement of communities and other stakeholders commensurate with the life of mine stage of the site.		
6.2 Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use	○	○	●	●	●	○	○	○	○	○	○	○	○	●	Whilst Anglo American sites are striving for compliance with our water-related policies and standards, there remain opportunities for improvement. These include engagement and collaboration with other water users in the various catchments on shared challenges, improvement in the robustness and accuracy of site water balances throughout the mining lifecycle and integration of stakeholder views of water management practices and the effectiveness of these.	
6.3 Design, construct, operate, monitor and decommission tailings disposal/ storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure	⊗	⊗	○	○	⊗	○	○	○	○	○	○	○	○	●	Along with other members of the ICMM, Anglo American has committed to conforming with the requirements of the Global Industry Standard on Tailings Management (GISTM) for all facilities with "extreme" or "very high" potential consequences by August 2023 and all other facilities by August 2025.	
6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment	●	○	●	●	●	○	○	○	○	○	○	○	○	⊗	Baseline Risk Assessments are undertaken at sites that identify high risk environmental impacts. Controls are developed and implemented based on the outcomes of the risk assessments, however additional work is required to consistently articulate the mitigation hierarchy in respect of managing pollution-related impacts within Group and site documents. Site-specific plans are developed in line with legal requirements to manage identified pollution sources.	
6.5 Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO2 equivalent (GHG) emissions	○	●	●	●	●	○	○	●	○	○	○	○	○	○	●	Anglo American has committed to achieving carbon neutrality across its operations by 2040. Operational emissions projects are being undertaken and emissions reporting takes place via our centralised data reporting system. Projects that require implementation to achieve our objectives are in various stages of development, approval and implementation.
Principle 7: Conservation of Biodiversity																
7.1 Neither explore nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated	●	●	●	●	●	●	○	●	●	●	●	●	○	●	Our Code of Conduct commits us to not explore or mine in World Heritage Sites. Our sites undertake a range of biodiversity assessments in order to ensure thorough understanding of the value of biodiversity at their site.	
7.2 Assess and address risks and impact to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no-net-loss to biodiversity	○	○	●	●	●	○	○	○	○	○	○	○	○	○	●	Baseline and biodiversity value assessments, including the identification of Priority Ecosystem Services are undertaken at sites. We have committed to achieving net positive impact in respect of significant biodiversity for all new activities. Where relevant, work continues on improving our biodiversity management plans and the development of offset plans.
Principle 8: Responsible Production																
8.1 In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials	○	○	●	●	●	○	○	○	○	○	○	○	○	○	●	Project evaluation processes are governed by the Anglo American Investment Development Model. Sustainable development principles including resource conservation are integrated into the project phase requirements. Our sites are working towards (and in some instances have attained) zero waste to landfill goals.
8.2 Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate	●	●	●	●	●	●	●	●	●	●	●	●	○	○	○	Hazards related to our mining products are assessed in line with jurisdictional legal requirements. This includes the preparation of material safety datasheets (MSDS) and labelling of transportation vessels. Some sites are not yet aligned with the requirements of the UN Globally Harmonised System.

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	Barro Alto	Codemim	Los Bronces	El Soldado	Chagres								
Principle 9: Social Performance													
9.1 Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate	○	●	●	●	●	○	○	○	○	○	○	●	We develop Socio-economic Development Plans at our sites that are aligned with the development plans for the host communities, where these exist. Our preference is to partner with local communities in the execution of these plans as far as is possible. Sites are working to improve the quality of these plans in line with our updated Social Way 3 expectations.
9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities	○	●	●	●	●	○	○	●	○	○	○	●	Our Code of Conduct and Local Procurement Policy set the framework for our efforts in this area. At some sites, work continues to improve the long-term sustainability of these programmes beyond mine closure and to increase specific consideration of vulnerable and marginalised groups in our procurement opportunities.
9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities	○	○	●	●	●	○	○	○	○	○	○	⊗	Stakeholder engagement plans are developed at our sites in alignment with the Social Way. This includes the requirement for a grievance mechanism aligned with the UN Guiding Principles on Human Rights. Some sites are working to update their SEPs, improve linkages with the SHIRAs, establish or join community engagement forums and improve the accessibility and cultural appropriateness of engagements and communications.
9.4 Collaborate with government, where appropriate, to support improvements in environmental and social practices of local Artisanal and Small-scale mining (ASM)	○	⊗	○	○	○	⊗	⊗	○	⊗	●	⊗	⊗	Where ASM activities are in progress in areas at or near our sites, we work to identify the relevant parties, engage with them and implement improvement practices where possible. Gaps have been identified at sites where current performance levels are lacking and work is being undertaken to address these in conjunction with external experts where appropriate.
Principle 10: Stakeholder Engagement													
10.1 Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Practices are in place to identify and engage with corporate-level external stakeholders through our International and Government Relations Policy, including in conjunction with institutional stakeholders. Engagement activities are reported throughout our Integrated Annual Report, our Sustainability Report and on our website.
10.2 Publicly support the implementation of Extractive Industries Transparency Initiative (EITI) and compile information on all material payment, at the appropriate levels of government, by country and by project	●	●	●	●	●	●	●	●	●	●	●	●	We are committed to supporting the EITI as stated in our Code of Conduct and Business Integrity policy. We publish an annual Tax and Economic Contribution report and our project by project level payments to governments is shared under the EU and ESTMA rules.
10.3 Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	We publish an annual Sustainability Report which is independently assured and aligned with the GRI standards.
10.4 Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and verifying membership requirements	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Independent assurance of the Group's performance in respect of compliance with the ICMM Principles is undertaken and published in our annual Sustainability Report. In line with the ICMM assurance framework, we will be progressing with external validation of the self-assessments that have been undertaken against the ICMM PEs.

KEY: ● Meets ◐ Partially meets ○ Doesn't meet ⊗ N/A

ICMM PERFORMANCE EXPECTATIONS Description	BULKS								DIAMONDS-DE BEERS		GROUP	COMMENT
	IRON ORE			STEELMAKING COAL					Gahcho Kué	Venetia		
	Kolomela	Sishen	Minas-Rio	Aquila	Capcoal	Dawson	Grosvenor	Moranbah North				
Principle 1: Ethical Business												
1.1 Establish systems to maintain compliance with applicable law	◐	●	◐	●	●	●	●	●	●	●	●	
1.2 Implement policies and practices to prevent bribery and corruption, and to publicly disclose facilitation payments	◐	◐	●	●	●	●	●	●	●	●	●	
1.3 Implement policies and standards consistent with the ICMM policy framework	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Whilst many of Anglo American's policies and standards are aligned with the ICMM Principles, specific references are not yet explicit in all policies and standards. An action has been raised in our action management system to address this with a target completion date of H2, 2023.
1.4 Assign accountability for sustainability performance at the Board and/or Executive Committee level	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	The Board of Anglo American is responsible for approving the company's policies in respect of safety, health and the environment; human rights; social performance and statement on modern slavery; and the Code of Conduct amongst others. It is further responsible for approval of any matters that have significant reputational, social or environmental implications for the Group. The Board's Sustainability Committee is responsible for overseeing Group level policies, processes and strategies designed to manage safety, health, environment, socio-political and supply chain (together "sustainable development") risks; to achieve compliance with sustainable development responsibilities and commitments; and to strive to be a global leader in sustainable mining.
1.5 Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Our Business Integrity Policy and Code of Conduct expressly prohibit political donations. Our Business Integrity procedures further describe mechanisms to manage instances where political donations may be implied as well as the political involvement by individuals who are employees of the Company.
Principle 2: Decision Making												
2.1 Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments in the design, operation and closure of facilities	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Sustainable development principles are embedded in the Innovation pillar of our strategy, via our FutureSmart Mining™ programme, which includes our ambitious Sustainable Mining Plan. Full details of which are available on our website. Our suite of Group level policies clearly state the requirement for sustainable development principles (or relevant sub-discipline principles) to be applied across the mining lifecycle.
2.2 Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices and by joint venture partners, suppliers and contractors, based on risk	◐	●	◐	●	●	●	●	●	●	●	●	Our Responsible Sourcing Standard drives our expectations of suppliers and contractors in respect of sustainable development performance. Contractor Performance Management policies and standards are in development across the Group to ensure that responsible sustainable development practices are adopted by our business partners. Where Anglo American is not the managing partner in a joint venture undertaking, it is our policy to seek opportunities to influence the management practices in place at these sites in alignment with our own policies and standards.

KEY: ● Meets ◐ Partially meets ○ Doesn't meet ⊗ N/A

ICMM PERFORMANCE EXPECTATIONS Description	BULKS									DIAMONDS - DE BEERS	GROUP	COMMENT	
	IRON ORE			STEELMAKING COAL									
	Kolomela	Sishen	Minas-Rio	Aquila	Capcoal	Dawson	Grosvenor	Moranbah North	Gahcho Kué				Venetia
Principle 3: Human Rights													
3.1 Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to	●	●	●	●	●	●	●	●	●	●	●	●	Commitments to our support for the UN Guiding Principles on Business and Human Rights are articulated in our Code of Conduct and Human Rights Policy and detailed further in our Social Way. Work is continuing through our Social and Human Rights Impact Assessment (SHIRA) process to fully identify and remediate potential human rights impacts and better include potentially affected stakeholders in our processes.
3.2 Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve likelihoods and standards of living of displaced people	⊗	●	◐	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	The Social Way Policy mandates the application of the mitigation hierarchy in respect of involuntary resettlements. Land Access and Displacement Strategies are required where resettlement cannot be avoided. Where sites are not yet fully compliant with this PE, work is in progress to close out historic resettlements including addressing livelihood and cultural heritage considerations. Processes to improve and document upfront analyses of project alternatives are also being refined where required.
3.3 Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights	◐	◐	◐	●	●	●	●	●	●	●	●	⊗	Anglo American is a signatory to the Voluntary Principles on Security and Human Rights. Our SHIRA process is used to identify areas where security risks may exist. These risk assessments are routinely reviewed and improved where deficiencies have been identified. Actions to improve performance include further inclusion of community and vulnerable groups in our assessment processes and in the development of mitigation strategies where these may be required.
3.4 Respect the rights of workers by: not employing child or forced labour; avoiding human trafficking; not assigning hazardous/ dangerous work to those under 18; eliminating harassment and discrimination; respecting freedom of association and collective bargaining; and providing a mechanism to address workers grievances	◐	●	◐	●	●	●	●	●	●	●	●	●	We adopt the International Labor Organisation's fundamental labour rights which includes respecting the right of association and collective bargaining and a zero tolerance approach to forced or bonded labour, child labour and unfair discrimination. In the host countries where we operate, these rights are also established in law. We have a grievance mechanism, Your Voice, which is available for employees and contractors to raise grievances. At some sites, behavioural and operational culture changes are required to ensure full compliance with our policies and standards. Increased utilisation of Your Voice by our business partners is also desired. In some jurisdictions, the potential use of fraudulent identity documents during the recruitment process is a challenge.
3.5 Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits	●	●	●	●	●	●	●	●	●	●	●	●	Our sites adopt local, national or industry level requirements in the determination of working hours, wages and benefits. Group policies do not currently specifically address these aspects. Where applicable, working conditions and wages are determined in line with collective agreements that exist between Group companies and labour unions. Compensation for overtime worked at Barro Alto is being revisited as are some aspects of the collective agreement in place at some of our PGM sites.
3.6 Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts; and deliver sustainable benefits for Indigenous Peoples	⊗	⊗	⊗	●	●	●	●	●	●	●	⊗	●	Respect for the rights, interests and perspectives of Indigenous Peoples is a requirement of our Code of Conduct. Sites give effect to this through implementation of the Social Way requirements.
3.7 Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage, and capture the outcomes of engagement and consent processes in agreements	⊗	⊗	⊗	●	●	●	●	●	●	●	⊗	●	Our sites are required to demonstrate that Indigenous Peoples affected by our activities have provided Free, Prior and Informed Consent for new activities or amendments to existing activities on lands and territories or with respect to significant adverse impacts on Indigenous Peoples and/or critical cultural heritage resources. This is governed by our Social Way in accordance with the International Council on Mining and Metals (ICMM) Position Statement and Good Practice Guide on Indigenous Peoples and Mining (2013).
3.8 Implement policies and practices to respect the rights and interests of women and support diversity in the workplace	◐	●	●	●	●	●	●	●	●	●	●	◐	We promote an inclusive environment where every colleague is valued and respected for who they are in a workplace that is free of discrimination. At a Group level, we have yet to specifically reference objective criteria for recruitment and compensation in our Group Human Resources Policy. At a site level, controls that ensure employment decisions are not made on the basis of personal characteristics are being improved, as is monitoring of business partner employment decisions. At some sites, behavioural culture changes are required to address instances of intimidation of female employees and availability of facilities for women require improvement.

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Principle 4: Risk Management													
4.1 Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results	◐	◐	◐	●	●	●	●	●	●	●	●	●	The requirement to undertake environmental and social impact assessments is driven by legislation in the jurisdictions in which we operate. Improvements are required at some sites to demonstrate how views of stakeholders have been considered in the project design phases including in the determination of mitigation measures.
4.2 Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict Affected and High Risk Areas, when operating in, or sourcing from, a conflict-affected or high-risk area	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Anglo American does not currently have any active operations in countries that are considered Conflict-Affected and High-Risk in terms of the OECD Due Diligence Guidance.
4.3 Implement risk-based controls to avoid/ prevent, minimise, mitigate, and/ or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system	◐	◐	●	●	●	●	●	●	●	●	●	⊗	Sites implement management systems in line with the requirements of our SHE Way which is aligned with recognised international risk management practices. Sites obtain external certification for their safety and health, environmental and social management systems and act on findings, where applicable, in pursuit of continuous improvement.
4.4 Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice	●	◐	◐	●	●	●	●	●	●	●	●	⊗	Emergency Preparedness and Response Plans are developed at site level to address emergencies specific to the context of the site. These must be tested on a regular basis and improvements to the plans made as required. The involvement of communities in the development and testing of these plans is not undertaken consistently across the Group at this time.
Principle 5: Health and Safety													
5.1 Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system	◐	◐	●	●	●	●	●	●	●	●	●	●	Our SHE Way establishes the requirements of a SHE management system that includes the identification, assessment, elimination, control and monitoring of health and safety hazards and occupational diseases utilising our Operational Risk Management approach. In some instances the quality of the risk assessments, completeness in terms of coverage of the full scope of activities and quality of associated management plans are being improved.
5.2 Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures	◐	◐	●	●	●	●	●	●	●	●	●	●	Training needs are identified in line with the requirements of the SHE Way and executed accordingly. Occupational exposure limits are identified and monitoring of exposures is undertaken. Improvements in progress include specifying protocols when exposures exceed the OEL, ensuring that training undertaken is effective and that employees are sufficiently knowledgeable to manage all risks to which they may be exposed.
Principle 6: Environmental Performance													
6.1 Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised	●	●	◐	◐	◐	◐	◐	◐	◐	●	●	●	Mine closure plans and associated financial estimates are prepared at each site in line with Anglo American standards and local legal requirements. A range of financial provision instruments exists across the Group. Actions are in place to improve the robustness of these plans and estimates in some instances as well as better consultation with and engagement of communities and other stakeholders commensurate with the life of mine stage of the site.
6.2 Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use	●	●	◐	◐	◐	◐	◐	◐	◐	●	●	●	Whilst Anglo American sites are striving for compliance with our water-related policies and standards, there remain opportunities for improvement. These include engagement and collaboration with other water users in the various catchments on shared challenges, improvement in the robustness and accuracy of site water balances throughout the mining lifecycle and integration of stakeholder views of water management practices and the effectiveness of these.
6.3 Design, construct, operate, monitor and decommission tailings disposal/ storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure	◐	◐	●	◐	◐	◐	◐	◐	◐	◐	◐	●	Along with other members of the ICMM, Anglo American has committed to conforming with the requirements of the Global Industry Standard on Tailings Management (GISTM) for all facilities with "extreme" or "very high" potential consequences by August 2023 and all other facilities by August 2025.
6.4 Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment	◐	●	●	◐	◐	◐	◐	◐	◐	●	●	⊗	Baseline Risk Assessments are undertaken at sites that identify high risk environmental impacts. Controls are developed and implemented based on the outcomes of the risk assessments, however additional work is required to consistently articulate the mitigation hierarchy in respect of managing pollution-related impacts within Group and site documents. Site-specific plans are developed in line with legal requirements to manage identified pollution sources.
6.5 Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO2 equivalent (GHG) emissions	●	●	●	◐	◐	◐	◐	◐	◐	●	●	●	Anglo American has committed to achieving carbon neutrality across its operations by 2040. Operational emissions projects are being undertaken and emissions reporting takes place via our centralised data reporting system. Projects that require implementation to achieve our objectives are in various stages of development, approval and implementation.

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Principle 7: Conservation of Biodiversity													
7.1 Neither explore nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated	●	●	◐	●	●	●	●	●	●	●	●	●	Our Code of Conduct commits us to not explore or mine in World Heritage Sites. Our sites undertake a range of biodiversity assessments in order to ensure thorough understanding of the value of biodiversity at their site.
7.2 Assess and address risks and impact to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no-net-loss to biodiversity	●	◐	◐	◐	◐	◐	◐	◐	◐	●	●	●	Baseline and biodiversity value assessments, including the identification of Priority Ecosystem Services are undertaken at sites. We have committed to achieving net positive impact in respect of significant biodiversity for all new activities. Where relevant, work continues on improving our biodiversity management plans and the development of offset plans.
Principle 8: Responsible Production													
8.1 In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials	●	●	◐	●	●	●	●	●	●	●	●	●	Project evaluation processes are governed by the Anglo American Investment Development Model. Sustainable development principles including resource conservation are integrated into the project phase requirements. Our sites are working towards (and in some instances have attained) zero waste to landfill goals.
8.2 Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate	●	●	●	◐	◐	◐	◐	◐	◐	●	●	◐	Hazards related to our mining products are assessed in line with jurisdictional legal requirements. This includes the preparation of material safety datasheets (MSDS) and labelling of transportation vessels. Some sites are not yet aligned with the requirements of the UN Globally Harmonised System.
Principle 9: Social Performance													
9.1 Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate	◐	◐	◐	●	●	●	●	●	●	●	●	●	We develop Socio-economic Development Plans at our sites that are aligned with the development plans for the host communities, where these exist. Our preference is to partner with local communities in the execution of these plans as far as is possible. Sites are working to improve the quality of these plans in line with our updated Social Way 3 expectations.
9.2 Enable access by local enterprises to procurement and contracting opportunities across the project life cycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities	◐	◐	◐	●	●	●	●	●	●	●	●	●	Our Code of Conduct and Local Procurement Policy set the framework for our efforts in this area. At some sites, work continues to improve the long-term sustainability of these programmes beyond mine closure and to increase specific consideration of vulnerable and marginalised groups in our procurement opportunities.
9.3 Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities	●	●	◐	●	●	●	●	●	●	●	●	⊗	Stakeholder engagement plans are developed at our sites in alignment with the Social Way. This includes the requirement for a grievance mechanism aligned with the UN Guiding Principles on Human Rights. Some sites are working to update their SEPs, improve linkages with the SHIRAs, establish or join community engagement forums and improve the accessibility and cultural appropriateness of engagements and communications.
9.4 Collaborate with government, where appropriate, to support improvements in environmental and social practices of local Artisanal and Small-scale mining (ASM)	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	Where ASM activities are in progress in areas at or near our sites, we work to identify the relevant parties, engage with them and implement improvement practices where possible. Gaps have been identified at sites where current performance levels are lacking and work is being undertaken to address these in conjunction with external experts where appropriate.
Principle 10: Stakeholder Engagement													
10.1 Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Practices are in place to identify and engage with corporate-level external stakeholders through our International and Government Relations Policy, including in conjunction with institutional stakeholders. Engagement activities are reported throughout our Integrated Annual Report, our Sustainability Report and on our website.
10.2 Publicly support the implementation of Extractive Industries Transparency Initiative (EITI) and compile information on all material payment, at the appropriate levels of government, by country and by project	●	●	●	●	●	●	●	●	●	●	●	●	We are committed to supporting the EITI as stated in our Code of Conduct and Business Integrity policy. We publish an annual Tax and Economic Contribution report and our project by project level payments to governments is shared under the EU and ESTMA rules.
10.3 Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	We publish an annual Sustainability Report which is independently assured and aligned with the GRI standards.
10.4 Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and verifying membership requirements	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	⊗	●	Independent assurance of the Group's performance in respect of compliance with the ICMM Principles is undertaken and published in our annual Sustainability Report. In line with the ICMM assurance framework, we will be progressing with external validation of the self-assessments that have been undertaken against the ICMM PEs.

The information contained in this declaration relates only to the operating year 2022 and Anglo American plc, its subsidiaries and affiliates (together, the “Anglo American Group”) expressly disclaim any obligation or undertaking to update the information contained herein due to a change in circumstances or otherwise, other than as required by the ICMM Mining Principles framework.

This information is made available for information purposes only. It is not intended to amount to any form of advice, recommendation or information on which any party is intended to rely.

Reference is made to Anglo American plc’s Integrated Annual Report and other public disclosures that we may make from time to time. To the fullest extent permitted by applicable law, none of the companies in the Anglo American Group nor any of their directors, officers, employees or consultants accept responsibility or liability for any loss or damage of whatever nature (direct, indirect, consequential, or other) whether arising in contract, tort or otherwise, which may arise as a result of use of or reliance upon any information contained herein.

The information presented includes forward-looking statements. By their nature, such forward- looking statements involve known and unknown risks, uncertainties and other factors which may cause the actual results to differ from what is expressed or implied by such forward-looking statements.



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