

Industry Associations: 2024 Review



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Our approach to industry associations

We take up memberships of, or participate in, industry associations where we believe our involvement will bring value to our business or to the interests of our shareholders or other stakeholders.

Each industry association is different. Whether a thematic, sectoral or geographical mandate, each has its own origin and history, which form the basis on which their specific priorities and approach are built. As such, many industry associations were not established to conduct advocacy and have never played that role, or they limit their advocacy to a narrow set of issues. As a consequence, several industry associations do not take public positions on key policy topics, such as climate change or human rights.

Other industry associations provide regular input into the policy making process, often representing a sector's specific interests, bringing together diverse and varied views, as well as the expertise of their members, to help policymakers develop more informed policy. Doing so can often lead to positions developed through compromise between the members or advocating the view of a majority which may not always align fully with our own views. Nevertheless, we believe the contribution that industry associations make – co-ordinating, synthesising, and harmonising what would otherwise be a great variety of inputs, then acting as a sounding board for governments, testing ideas and seeking feedback – brings real value to policymaking processes.

We recognise that there is interest in our industry association memberships and the policy advocacy role that some associations play. Therefore, in addition to monitoring by those Anglo American employees who manage a relationship with an industry association, we remain committed to:

- 1) Annual disclosure of active memberships, committee positions and financial contributions on our website.

– For more information:
[Policy Advocacy | Anglo American](#)

- 2) A biennial independent analysis of the alignment between Anglo American standards and policies and those of the industry associations of which we are a member. This report forms the Anglo American response to that independent analysis. We intend to publish the next review of our industry associations in 2027.

This review

The independent nature of the underlying biennial analysis aligns with our commitment to governing our industry association memberships with transparency. This report is the fourth such review – the first having been published in 2019, reviewing advocacy from 2018.

This review covers 44 of Anglo American's industry associations. Associations were selected for inclusion in this review based on the materiality of the industry association, both in terms of Anglo American's influence within the association and in terms of the impact of the association on climate policy.

To select which associations were in scope for this review, four sequential filters were applied:

- 1. Size of market:** associations based outside Anglo American's top 5 production regions by revenue were removed from the scope of this review. Global associations were automatically included.
- 2. Markets with high climate related risk:** associations based outside of Anglo American's top 5 regions by greenhouse gas emissions (scope 1&2) were removed from the scope of this review. Global associations were automatically included.
- 3. Strategically relevant markets:** associations were removed from the scope of this review if they did not represent Anglo American's 2024 businesses including: iron ore, copper, crop nutrients, steelmaking coal, diamonds and PGMs. Industry associations which were not commodity or industry specific but which took public policy positions on climate or human rights issues were included.

Annual membership: associations were removed from the

scope of this review if Anglo American paid less than \$10,000 in annual membership.

Since 2022, the number of Anglo American's climate change positions has increased from eight to ten, following the consolidation of certain positions and the establishment of three new positions. The independent review assessed the ten climate policy positions and eight human rights policy positions against the 44 industry associations selected for inclusion. The majority of our qualifying industry associations were found to either be aligned with our climate and human rights positions or to have no public position against which to test alignment. The independent analysis conducted by ERM of the alignment between Anglo American's standards and policies and those of the industry associations of which we are a member found 16 differences on climate change which they considered 'material differences'. No such 'material differences' were identified on human rights.

Following the identification of the material differences, we took the following actions:

- Informed the relationship owner for each industry association of the highlighted material difference
- Together with the relationship owner, assessed what action, if any, should be taken
- Engaged with the relevant industry associations.

Through this process we concluded that none of the 'material differences' highlighted should result in changes in the status of our membership with any of the associations.

Nevertheless, the substance of the analysis is a helpful input into our ongoing engagement with each association. Detail of each identified 'material difference' and our actions, is provided later in this report.

- A full independent analysis has been conducted by ERM.
 – For more information: <https://www.angloamerican.com/industry-association-review-erm-2024>

Governance

We recognise stakeholder interest in advocacy undertaken by third party organisations and the concern that advocacy might not be entirely aligned with our public policy positions on climate change and human rights.

To mitigate the risk that advocacy from industry associations is misaligned with our positions on climate change and human rights, we have rigorous internal governance procedures in respect of the management of the relationships with each of the industry associations of which we are a member. This governance is designed, in part, to ensure that material misalignments in advocacy do not occur and, if they ever do, that action is taken.

Anglo American works hard to ensure that our voice is heard, and our views are reflected within industry associations. We continue to strengthen our internal governance procedures, including regular refreshment of compliance training for relevant personnel across Anglo American.

Our governance of our memberships of industry associations is built on three pillars: transparency, high standards, and clear accountability.

Transparency

We are committed to being transparent about our memberships of industry associations and we publish relevant details of the memberships we have on our website. Each entry explains why we are a member of that industry association, any positions of responsibility that Anglo American employees play in the association, and Anglo American's annual financial contribution. This disclosure allows scrutiny of the details of our memberships and the ability to raise any questions or concerns. We also ensure adherence to all mandatory requirements of lobbying registers both directly as Anglo American and any consultants working on our behalf.

With respect to financial contributions, in 2024, we made contributions totalling approximately US\$15.6 million to industry associations, excluding the two noted below with larger contributions. The amount disclosed relates to membership fees and/or other payments to associations, including in respect of programmes run by the associations, apart from where reasons of commercial confidentiality require us to withhold disclosure. In addition, in 2024 our contributions to the marketing of diamonds through the Natural Diamond Council and platinum through the Platinum Guild International, totalled US\$60 million.

High standards

We expect all our industry associations, as well as contractors, suppliers and agents, to act in a way which is consistent with the principles contained in Anglo American's Code of Conduct.

Our Business Integrity Policy also sets out the standards of conduct we expect of all our employees to help manage bribery and corruption risk. We expect our industry associations to follow comparable standards of conduct. Our full Business Integrity Policy is available.

– For more information:

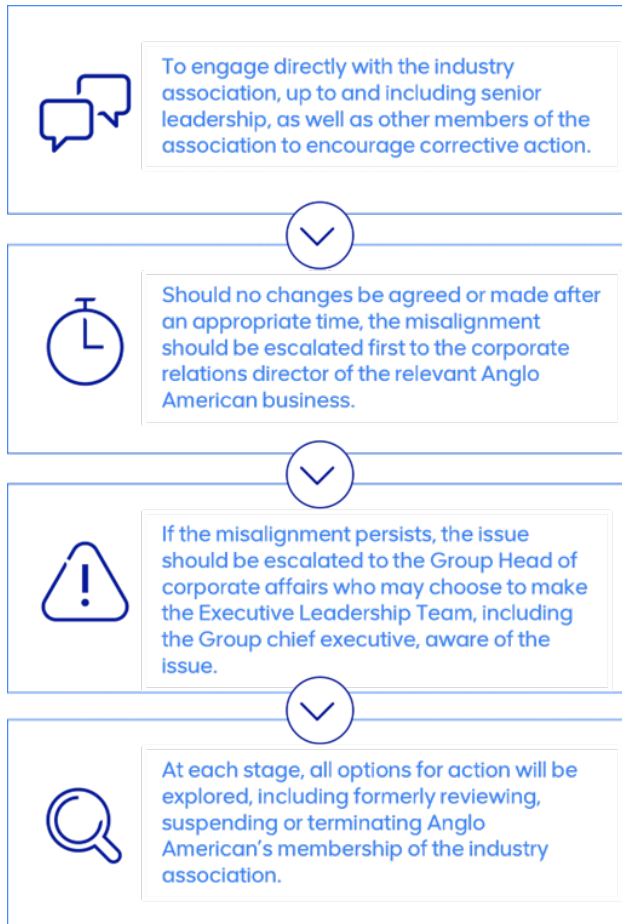
[Group Business Integrity Policy – English
\(\[angloamerican.com\]\(https://www.angloamerican.com\)\)](https://www.angloamerican.com/group-business-integrity-policy-english)

Our intention is to ensure that there can be no scope for any perception that Anglo American is exercising improper influence through its memberships of industry associations.

Anglo American is also committed to being transparent about our political engagement and prohibit the making of donations for political purposes to any politician, political party or related organisation, or to any official of a political party or candidate for political office in any circumstances, either directly or through third parties, including industry associations. In this respect, we do not favour any political party, group or individual and expect the industry associations of which we are a member to act accordingly. This approach is detailed in Anglo American's Code of Conduct.

Clear accountability

Each industry association of which we are a member has a designated Anglo American employee as the relationship owner. The expectations of that relationship owner are set out in the internal Group Government Relations Handbook. If a misalignment between Anglo American standards or policy positions is identified, there is a clear process for escalation as follows:



Monitoring of industry association memberships

The governance that we have in place should enable us to identify any activity by an industry association that might not be aligned with Anglo American's policies or practices. Specifically, each Anglo American employee with responsibility for the relationship with an industry association is reminded of their obligations with respect to monitoring the activities of the association. Formalised monitoring of our associations is represented by the biennial publication of this report and the annual disclosure of memberships.

However, we recognise that other interested parties may identify issues of potential concern which the Anglo American relationship owner may not be aware of and, therefore, it is important that we provide others with the opportunity to raise concerns with us. To that end we have provided a channel, through the Anglo American website, for anyone to raise concerns or questions about our memberships directly to Anglo American's Government and International Relations team. Any Anglo American employee, contractor, supplier or any other stakeholder who wishes to raise an issue of concern confidentially, is additionally able to do so through the Anglo American "YourVoice" whistleblower service. – **For more information:**

www.yourvoice.angloamerican.com

Emerging frameworks and expectations with respect to climate lobbying

In 2015, we demonstrated our commitment to the Paris Agreement through our signature of the Paris Pledge for Action. That pledge demonstrates our willingness to work to support efforts in meeting and exceeding the ambition of governments to keep the world on a trajectory that limits the global warming temperature rise to well below 2°C and where possible, 1.5°C below pre-industrial levels. This pledge continues to guide our position and as such, Anglo American remains committed to conduct lobbying in line with the goals of the Paris Agreement. Aligned with our approach to third party lobbying, our intention is that the industry associations of which are a member, also support this approach and advocate for policies that support the achievement of the Paris Agreement.

We are also mindful of emerging disclosure expectations through the forthcoming implementation of applicable and relevant frameworks such as the UK's Transition Plan and evolving standards, for example the International Sustainability Standards Board (ISSB) climate-related disclosures. Beyond mandatory disclosures alone, we also recognise the role of voluntary frameworks and standards in supporting the evolving interests and expectations of our stakeholders in understanding our thinking on both climate change and climate change lobbying. We have had a regular and constructive dialogue with the Climate Action 100+ group of investors for several years and value its perspectives. In 2020 and 2021, we worked with Climate Action 100+ to support the development of the Net Zero Company Benchmark and its application to the diversified mining sector, including Indicator 6 focused on climate policy engagement. Related to this, as part of our existing commitment to conduct lobbying in line with the goals of the Paris Agreement, we are also considering how more of the recommendations made by the Global Standard on Responsible Lobbying might be incorporated into our existing governance and transparency processes.

Anglo American policy positions/statements

To bring greater definition to our approach to any climate-related advocacy that we might be party to, we maintain a list of public policy positions.

These define Anglo American's thinking on specific climate-related policy issues and provide a basis against which we can test the alignment of any third-party advocacy.

In 2024, we updated our public policy positions and redefined them across ten issues. These revisions reflected developments in the public discourse, policy environment and societal expectations. The updated policy positions are listed in full below.

Climate change policy statements

The Science and Paris Agreement

Anglo American supports the implementation of the Paris Agreement, underpinned by mainstream climate science as assessed by the Intergovernmental Panel on Climate Change (IPCC). We recognise the Paris Agreement as the basis of governments' aims to limit the global temperature increase to 1.5°C, which in turn informs our approach to climate change mitigation.

Value chain decarbonisation

While Scope 3 emissions are always the direct emissions of another entity, Anglo American recognises the role we can play in helping to reduce the emissions intensity of our value chain and therefore reducing our Scope 3 emissions. We advocate for policies that incentivise value chain partners to adopt low-carbon technologies and practices, and we support the development of standardised approaches to measure and report Scope 3 emissions across industries.

Carbon Compensation

Anglo American advocates for the integration of high-integrity carbon compensation into emission reduction strategies, recognising that compensation should come after all feasible avoidance, reduction, and restoration measures have been taken. We support regulations to ensure the quality and transparency of carbon offsets and carbon markets.

Carbon pricing and market mechanisms

Anglo American believes carbon pricing mechanisms have a critical role to play in driving meaningful action on Greenhouse Gas (GHG) emissions reductions. We support the development of consistent, broad, and interoperable carbon pricing policies across jurisdictions deployed through fair and well-designed market-based instruments to incentivise investment in low emission technologies.

Grants and incentives

Anglo American advocates for the expansion of targeted financial incentives, including grants, R&D funding, and tax credits, to accelerate the development and deployment of low-carbon technologies. We support policies that prioritise funding for innovations in renewable energy, energy efficiency, and carbon capture and storage (CCS), and advocate for these incentives to be structured in a way that drives investment in sustainable infrastructure.

Transparency and climate disclosure

Anglo American supports transparency on policy engagement including climate-related matters, as expressed by the Global Standards on Responsible Policy Engagement. We advocate for well-designed frameworks which encourage the disclosure of decision-useful information, such as the Task Force on Climate-Related Financial Disclosures (TCFD) and the International Sustainability Standards Board's (ISSB). We also promote the need for consistency in disclosure standards to ensure comparability.

Resilience and adaptation

Anglo American is committed to enhancing climate resilience across our operations and the communities we impact. We advocate for policies that support the integration of climate adaptation measures into planning, including investments in resilient infrastructure, water resource management, and disaster preparedness. We support collaborative efforts with governments, NGOs, and other stakeholders to develop and implement effective adaptation strategies.

Just Transition

Anglo American promotes an approach to climate transition which considers the societal impacts, aiming to ensure that that transition is 'equitable' and 'just'. We remain committed to considering how the Just Transition principles can be embedded in the conduct of all our business activities, including our approach to decarbonisation.

Nature / Biodiversity

Anglo American recognises the interdependency between climate and nature – noting that natural carbon sinks are a critical component of achieving net zero emissions at a global level. We advocate for policies that prioritise the conservation and restoration of ecosystems, promote sustainable land use practices, and integrate biodiversity considerations into climate policies, aligned to the vision of the Global Biodiversity Framework. We support initiatives that enhance natural carbon sinks, such as reforestation, and advocate for the inclusion of nature-based solutions in climate strategies.

Renewable power / low carbon electricity sources

Anglo American advocates for the global accelerated deployment of renewable energy and low-carbon electricity sources which can help support the provision of reliable, low carbon electricity for all sectors. We support policies that facilitate the development of renewable energy infrastructure, remove barriers to grid integration, and promote the decarbonisation of the power sector.

Human rights

United Nations Guiding Principles

We fully commit to implementing the UN Guiding Principles (UNGP) on Business and Human Rights introduced in 2011. Where we have since caused or contributed to adverse human rights impacts, we believe in contributing to remediation as appropriate.

Labour and employee rights

As signatories to the United Nations Global Compact, we are committed to the labour rights principles set out in the International Labour Organization core conventions, including the right to freedom of association and collective bargaining, non-discrimination, and the eradication of child and forced labour. Observance of these rights is required of all our operations and suppliers, irrespective of location. We recognise our responsibility to ensure that within our collective supply chains the purchasing of goods and services is done without inadvertently exploiting human rights and is free of modern slavery. We are committed to ensuring that every employee earns a 'liveable' wage and want to be certain that this principle is applied to all our employees in each of our locations. We have been an accredited Living Wage employer in the UK since 2014 through the Living Wage Foundation and have now secured a Living Wage accreditation with the Fair Wage Network.

Vulnerable groups

We pay special attention to the rights of vulnerable groups including indigenous Peoples, women, national or ethnic minorities, religious and linguistic minorities, children, persons with disabilities, and migrant workers and their families. We acknowledge the role of human rights defenders including through safeguarding human rights; the rule of law; and healthy, functioning markets. Underpinned by our Values and our Code of Conduct, we believe in the promotion of an inclusive environment where every colleague is valued and respected for who they are and has the opportunity to fulfil their potential. We support the need to set appropriate global goals for the diversity of gender and culture and ensure continuous improvement.

Community rights

The needs and concerns of all our stakeholders informs and guides our approach to doing business. We aim to make a lasting, positive contribution to the countries and communities in which we operate. We seek to create and maintain mutually beneficial relationships by understanding and maximising the positive influence we can have on local, regional and national development. Specifically in relation to community complaints and grievances, we ensure that our managed operations procedures align with the UNGP effectiveness criteria including communicating that the existence of complaints and grievance mechanisms do not preclude the right of stakeholders to engage in judicial or other legitimate processes.

Voluntary Principles on Security and Human Rights

Anglo American promotes the Voluntary Principles (VPs) on Security and Human Rights (VPSHR) at both international and local level. The company remains committed to implementing the VPs and applies them in all relevant managed operations, recognising that our operations may be located where there are pre-existing, possibly violent, underlying or potential conflicts that can adversely affect local communities, Anglo American's employees' operations, and the relations between them.

Leverage

Anglo American is committed to promoting adherence to human rights within our own operations and encouraging adherence at independently managed joint ventures. Wherever possible we will work to encourage positive change through exercising our influence.

Free Prior and Informed Consent (FPIC)

Anglo American is committed to the International Council of Mining and Metals (ICMM) Position Statement on Indigenous Peoples. As such, our project approval processes require that Indigenous Peoples are: (i) able to freely make decisions without coercion, intimidation or manipulation; (ii) given sufficient time to be involved in project decision making before key decisions are made and impacts occur; and (iii) fully informed about the project and its potential impacts and benefits. The Anglo American Social Way 3.0 reaffirms our commitment and provides practical guidance on how to achieve FPIC.

Binding treaty

Anglo American remains committed to the implementation of the UNGPs (integrating human rights due diligence in our risk processes; training and awareness raising for our employees; and communicating, monitoring and reporting on our progress). In principle, we are supportive of mandatory human rights due diligence and will work to ensure the detail of those measures do not result in unconstructive, unintended consequences for rights holders or our business.

Summary findings and actions taken

The independent assessment conducted by ERM, published alongside this report, is a helpful contribution to our monitoring of the positions and actions of our industry associations.

The desk-based review drew on public information available between September and December 2024 to evaluate whether Anglo American's policy positions on climate change and human rights are aligned with, or contradictory to, the positions held by the associations evaluated.

The following section summarises the 'material differences' identified by ERM, our response to them, and resultant actions.

We also continue to monitor those organisations with which 'some differences' were identified and may choose to escalate engagement with certain groups should we deem it necessary.

Material differences

A significant majority of the industry associations assessed have no public position in relation to some or all of the Anglo American climate change and human rights policy positions. This reaffirms the observation that there are different types of industry associations, many of which do not take public positions on issues, nor do they advocate positions with governments or others.

The following criteria were used to categorise the degree of alignment:

CLASSIFICATION	DEFINITION
1. Aligned	Industry association position is aligned with Anglo American's position.
2. Some difference(s)	Industry association position is similar but not fully aligned with Anglo American's position, and/or the position is silent on some element of Anglo American's position. Any differences are not considered material.
3. Material difference(s)	Industry association position is significantly different from (i.e., contrary to) Anglo American's position. This includes where public statements have been made by senior representatives of the industry association that are significantly different from Anglo American's position.
4. No public positions	ERM found no public position on this topic.

ERM identified the following 'material differences':

POLICY AREA	DIFFERENCE TYPE	REGION(S)	INDUSTRY ASSOCIATION
Value Chain Decarbonisation	Policy design / approach	Australia	<ul style="list-style-type: none"> Low Emission Technology Australia (LETA) Mineral Council of Australia (MCA)
Carbon Compensation	Legacy support for continued role of fossil fuels with CCS	Australia and Global	<ul style="list-style-type: none"> Low Emission Technology Australia (LETA) Coal Industry Advisory Board (CIAB)
Grants and Incentives	Legacy support for continued role for fossil fuels with CCS/hydrogen generation		<ul style="list-style-type: none"> Low Emission Technology Australia (LETA) Queensland Resources Council (QRC) Coal Industry Advisory Board (CIAB)
Renewable Power / Low Carbon Electricity Sources	Legacy support for continued role for fossil fuels		<ul style="list-style-type: none"> Low Emission Technology Australia (LETA) Queensland Resources Council (QRC) Coal Industry Advisory Board (CIAB)
Carbon Pricing and Market Mechanisms	Policy design / approach	South Africa and Europe	<ul style="list-style-type: none"> Eurometaux Minerals Council South Africa (MCSA) Business Leadership South Africa (BLSA) Business Unity South Africa (BUSA) Energy Intensive Users Group (EIUG) Energy Council of South Africa

Response and actions taken

Value Chain Decarbonisation

Anglo American recognises the importance of reducing Scope 3 emissions and remains committed to doing so. However, the nature of Scope 3 emissions – that they are the direct emissions of another entity – makes influencing the emissions a challenge. The approach to reducing Scope 3 emissions must include partnering with others along our value chain. Setting and achieving targets for Scope 3 emissions needs to be seen in this context.

ERM's assessment suggests a material difference between Anglo American's policy position on Value Chain Decarbonisation and that of LETA and the MCA on the basis that both organisations 'argue that ... [Scope 3] emissions should be instead be accounted for by direct emitters'. Anglo American believes that in both cases LETA and the MCA are not obfuscating the Scope 3 responsibilities of their members companies, but are instead making the case that responsibility for those emissions should be shared throughout the value chain, including with the entity for which the emissions in question are under their direct control as Scope 1 emissions. We will continue to engage with LETA and MCA to ensure that their advocacy on Scope 3 emissions is constructive and supportive of taking a whole value chain approach to reducing emissions.

Fossil Fuels

ERM suggests that three Australian industry associations – LETA, QRC and the CIAB – are all materially misaligned in relation to advocacy about fossil fuels which contradicts Anglo American's positions on Carbon Compensation, Grants and Incentives and Renewable Power / Lower Carbon Electricity Sources. The advocacy in question makes the case for the use of fossil fuels in the medium term with the use of technologies like CCS. It also cites the economic and energy security benefits that fossil fuels bring.

Anglo American agrees with ERM that the issue here is in part determining whether the advocacy in question is misaligned with the spirit of Anglo American's position statements, though it may be technically compliant. Anglo American believes there is a legitimate debate to be had regarding the role of fossil fuels in the energy mix in the short / medium term if technologies like CCS are utilised. However, if arguments for the use of fossil fuels on a temporary basis are being made as a pretence for their indefinite use, then clearly that contradicts the spirit of Anglo American's principles. As part of our ongoing engagement we have shared ERM's analysis with the LETA, QRC and the CIAB, highlighting the perceived misalignment. We will continue to engage with the industry associations in question, working towards alignment between their advocacy and the

Carbon Pricing and Market Mechanisms

As with the last time this review was done in 2022, several associations' positions on carbon pricing have been assessed as being 'materially different' to our own. Though the volume of advocacy from industry associations has not materially increased, the number of industry associations who have been found to be misaligned has increased by three. This is the result of a joint letter that a number of South African associations signed related to carbon tax proposals. In reviewing the perceived differences, as well as studying similar exercises conducted by other organisations, we recognised a particular challenge in this area – in effect, that it is easy to perceive advocacy against a specific carbon pricing mechanism as being advocacy against the concept of carbon pricing. Drawing a comparison with more general taxation, advocacy against a given tax policy would not be seen by most as advocacy against the concept of taxation. We believe strongly that the same approach must be considered and understood as carbon pricing becomes more common around the world. The challenge we face is understanding whether advocacy is indeed in favour of the concept but arguing against specific measures.

Against this backdrop, we believe that in the cases of Eurometaux, MCSA, BLSA, BUSA, EIUG and the Energy Council of South Africa, the perceived 'material difference' highlighted has, in fact, been focused on the way in which a carbon tax is being designed or applied in the respective jurisdictions and does not represent opposition to the application of carbon pricing as a matter of principle. In short, we believe that they are, therefore, aligned with our own policy position.

As such, while we will continue to engage with Eurometaux, MCSA, BLSA, BUSA, EIUG and the Energy Council of South Africa, including sharing our updated policy statements and associated expectations, we do not intend to take any further action as a result of this review.

Annex – our annual memberships above US\$100,000¹

INDUSTRY ASSOCIATION	REGION	FEE (USD)	WEBSITE
Natural Diamond Council	Global	\$34,374,000	https://www.naturaldiamonds.com/council/
Platinum Guild International	Global	\$26,000,000	https://platinumguild.com/
World Platinum Investment Council	Global	\$3,600,000	https://platinuminvestment.com/
Minerals Council South Africa - MinCoSA	South Africa	\$2,737,000	https://www.mineralscouncil.org.za/
International Council on Mining and Metals – ICMM	Global	\$1,432,000	https://www.icmm.com/
International Copper Association – ICA	Global	\$1,000,000	https://copperalliance.org/
Minerals Council of Australia	Australia	\$740,000	https://minerals.org.au/
Nickel Institute	Global	\$640,000	https://www.nickelinstitute.org/
Queensland Resources Council - QRC	Australia	\$637,000	https://www.qrc.org.au/
Low Emission Technology Australia - LETA	Australia	\$263,000	https://letaaustralia.com.ac
Initiative for Responsible Mining Assurance - IRMA	Global	\$250,000	https://responsiblemining.net/
Development Partner Institute	Global	\$250,000	https://dpimining.org
Brazilian Mining Institute - IBRAM	Brazil	\$195,000	https://ibram.org.br/en/
Consejo Minero	Chile	\$171,000	https://consejominero.cl/
Hydrogen Forward Coalition	USA	\$140,000	https://www.hydrogenfwd.org/
Sociedad Nacional de Minería, Petróleo	Brazil	\$137,000	https://www.snmpe.org.pe/
International Platinum Group Metals Association	Global	\$108,000	https://ipa-news.com/

¹ Fees have been rounded to the nearest thousand