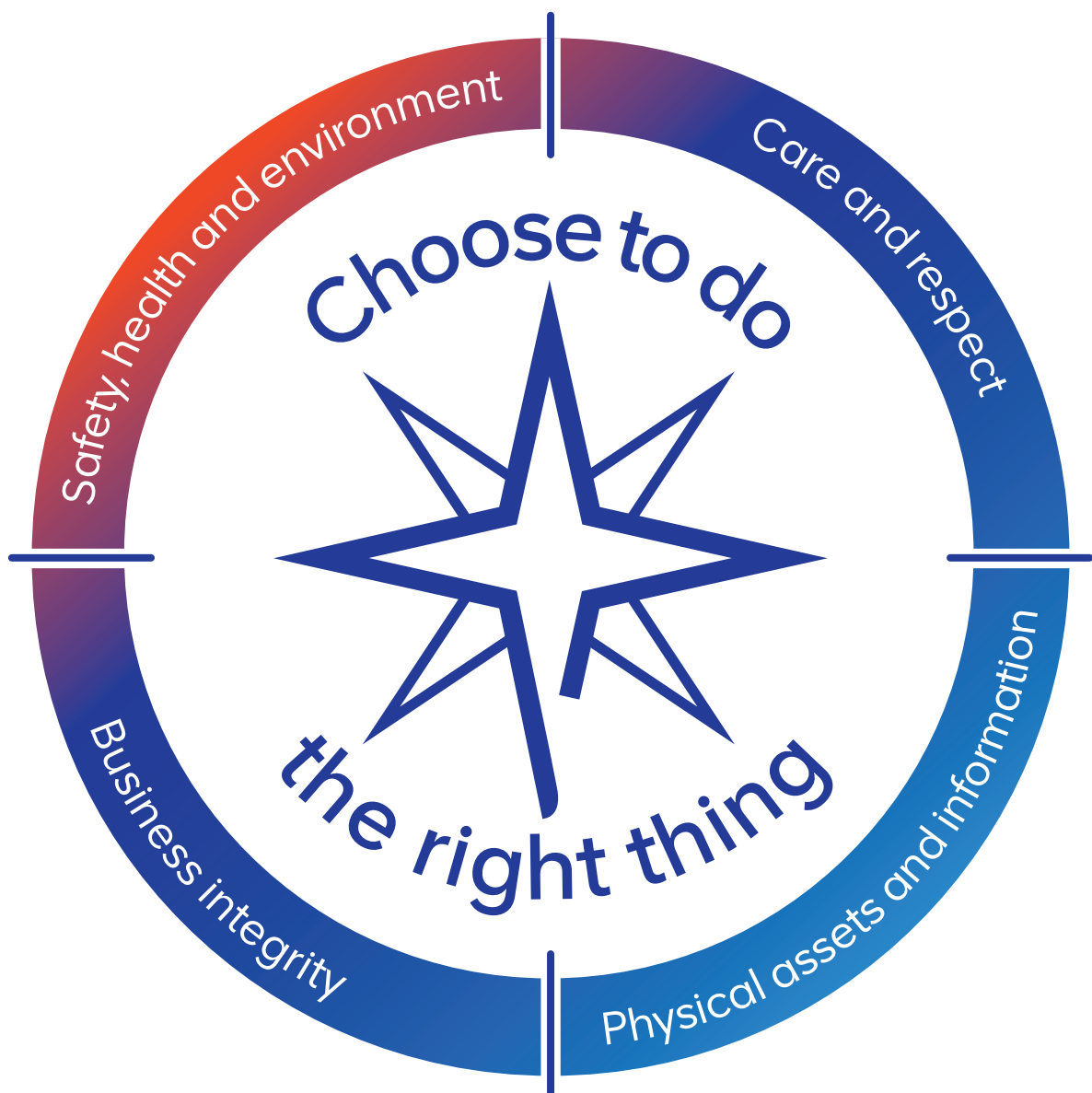


Our Code of Conduct

Our Values in action



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Our Values



Safety



Care and Respect



Integrity



Accountability



Collaboration



Innovation

For more information about our Values and behaviours, go to page 5.

Our role as a responsible miner

Anglo American is a leading global mining company focused on the responsible production of copper, premium iron ore and crop nutrients – future-enabling products that are essential for decarbonising the global economy, improving living standards, and food security. Our people are at the heart of our business. It is our people who use the latest technologies to find new resources, plan and build our mines, and who mine, process, move and market our products to our

customers around the world. As a responsible miner, we work together with our key partners and stakeholders to safely and sustainably unlock the long-term value that these precious resources represent for our shareholders, but also for the communities and countries where we operate, making a real difference in the eyes of all our stakeholders. Above all, we are guided by our Purpose – to re-imagine mining to improve people’s lives.

7 Important things to know about our Code of Conduct



1

Our Code of Conduct (the Code) brings together the requirements for ethical business conduct that we all need to follow.

2

Use this Code as a guide directing you to Group Policies and further information sources to help you when you have to make difficult choices about the right thing to do.

3

Our Code applies to everyone in the Anglo American Group, including members of the Board of Directors. We all have a responsibility for upholding high standards, whoever we are and wherever we work.

4

People are held accountable for their behaviour and action is taken where the Code has not been followed. Consequences depend on how an individual has broken applicable policies and in what circumstances, and can range from a warning to dismissal, in accordance with our Accountability Framework.

5

We expect our contractors, suppliers, agents and industry associations we belong to, along with their employees, to work and act in a way that is consistent with our Code.

6

We have operations in many countries, each with its own laws. Everyone is trusted to follow the laws that apply to them and to do the right thing, even when the law does not give specific guidance. When laws set standards that are different from our Code, we expect people to follow whichever sets the higher standard of behaviour.

7

If you are a manager or leader, you have additional responsibilities. You must lead by example by exemplifying our vision of ethical business conduct in your words and actions. You must also help your team members to understand and apply our Code, and always listen and respond thoughtfully to any questions or concerns they raise. If you are ever uncertain about how to proceed, you should reach out for guidance and support.

For ease of reading, we use generic language in describing the Group, and you can read more about this at the end of this document.

A message from our Chair

Dear colleagues,

The world around us continues to evolve at pace and the stakeholder expectations of companies and the role they play are increasing. In our own business, our actions are not only judged by those close to our operations, but also by the international community and society at large.

Quite rightly, what we do in any one country is measured against the relevant legal standards but, when it comes to our reputation as a whole, we are viewed in comparison with global best practice.

As a mining company operating all over the world – from early-stage exploration through to our customers – we also face numerous external uncertainties, including geopolitical volatility, cyclical commodity markets, cyber threats, and sometimes unpredictable regulatory environments.

Such dynamics put companies' ethical performance into the spotlight, and highlight the importance of committing to high standards of business conduct, as well as being able to demonstrate proper compliance with these standards throughout our organisation.

A challenging external environment, and the need for business to navigate it accordingly, contributes to increased risk. More than ever, we all need to commit to acting with integrity and displaying care and respect for the rights and livelihoods of our colleagues, communities and the natural environments in which we work.

At Anglo American, our Purpose is to re-imagine mining to improve people's lives. Achieving this ambition depends not only on what we produce, but on how we conduct ourselves every day. Our commitment to ethical leadership, responsible business practices and respect for people and the environment underpins the trust placed in us by our stakeholders and enables us to safeguard our licence to operate, unlocking new opportunities and creating enduring value for society. Living our Purpose therefore requires every one of us to act with integrity and in accordance with our Values, both inside and outside the workplace, ensuring that our decisions and actions consistently reflect the standards expected of a leading global mining company.

This Code of Conduct aims to be a single point of reference for everyone associated with Anglo American. It is also a departure point for a fuller understanding of our ethical policies and procedures. It sets out how we must all behave in accordance with our Values in order that we make a positive difference wherever we work, and is one of the ways in which we help protect Anglo American's good name as a responsible mining company.

Please add your personal commitment to living out the Values that our Code of Conduct describes.



Stuart Chambers
Chair



Why our Code of Conduct matters to us all

Dear colleagues,

I am proud of our Code of Conduct, which makes it very clear 'what' we must all do and 'how' we must behave to look after each other, to do the right thing for the people and environment around our operations and, in doing so, to protect our reputation. Our Code symbolises what we stand for.

Our Code of Conduct explains the boundaries we must work within every day, and brings together in one place our ethical principles and policies. It has at its core our shared Values, which describe how we must behave consistently to earn and sustain the trust that gives us our social licence to operate.

The ethical and moral decisions we make every day, by choosing to do the right things and delivering on our promises, are what build that trust and demonstrate our Values in action. Our Code applies to everyone working for and with us, from our employees and contractors to our business partners. Read it, understand it and follow it. We are personally and collectively accountable for the actions we take and must apply our judgment when deciding what to do and how to do it. Our Code empowers us all to make the right decisions, including putting safety first every time, behaving with integrity, and showing care and respect for each other.

The Code also serves as a reminder of the behaviour we can all ask of, and expect, from our colleagues, the Values we should all exhibit, and the standards Anglo American has committed to uphold in its interactions with key stakeholders, such as the communities and governments in the countries where we operate. It is central to Anglo American making a real difference, and to the pride we should all feel in contributing to that outcome.

Keep coming back to the Code for direction and guidance if ever you are in any doubt about the right thing to do when faced with an ethical dilemma or legal concern. Equally, if you see or hear anything that is, or may be, contrary to our Values, this Code or the Group Policies that underpin it, speak up. No one is ever on their own. Your line manager should be the first person that you turn to in these situations, but we also have a service, YourVoice, that enables any employee, colleague or stakeholder to confidentially and anonymously report concerns relating to the integrity of anyone's conduct.

By remaining true to our Values and complying with the Group Policies in this Code, you are demonstrating your commitment to creating sustainable value that lives up to our Purpose: to re-imagine mining to improve people's lives.



Duncan Wanblad
Chief Executive Officer

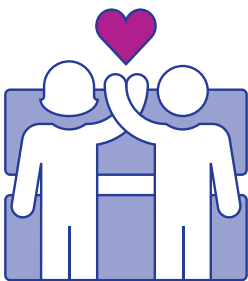


Our Values and behaviours

As an organisation we strive to treat all people in a way that allows them to bring the best of who they are to work. Our Values and the way in which we, as individuals, are expected to behave are the foundation for our Code. Acting according to these Values and behaviours defines our culture as an organisation, underpinning our good reputation and the promise we make to all our stakeholders.



Safety



Care and Respect



Integrity

We give our all to eliminating injuries because we value life and are unconditional about safety, health and well-being at work and at home.

- I put safety and health first in everything I do, no matter what.
- I do everything I can to eliminate loss of life and believe all injuries are preventable.
- I care about the safety of my colleagues, communities and all our stakeholders as much as I care about my own.
- I am aware of my surroundings and what I need to do to manage risks by ensuring that critical controls and standards are in place.
- I have the courage to take action and empower others to speak up and do the same.

We believe in humanity and therefore show care and respect for all people and will not turn a blind eye to what is wrong.

- I include and embrace diversity in all its forms.
- I put myself in others’ shoes and take the time to appreciate and consider their views and needs.
- I listen to understand and communicate openly, always welcoming different points of view.
- I think carefully about the impact of what I do on others and am open to change to achieve a better outcome for all.
- I take into account the best interests of my colleagues, our stakeholders and the environment and act accordingly.

We always act honestly, fairly, ethically and transparently.

- I hold myself accountable for doing what I say and being clear about my motives.
- I do the right thing and speak up if something is not right, even when it is uncomfortable.
- I listen to and respect peoples’ concerns without pre-judging and resolve them positively.
- I never take shortcuts that could compromise the principles by which we behave.
- I do my part to help create a workplace where people do not hesitate to challenge and call out what is wrong.



Accountability

We own our decisions, actions and performance, and are empowered to make choices and learn from our experiences.

- I own what and how I do my work together with my team and clarify anything I am unsure of.
- I have a ‘can do’ attitude and encourage it in others.
- I have the courage to admit my mistakes and ensure we all learn from them.
- I go above and beyond for the good of our organisation and our stakeholders.
- I deliver on our shared commitments.



Collaboration

We collaborate with colleagues and stakeholders towards a common purpose and to achieve exceptional outcomes.

- I make decisions based on what is good for the entire organisation and our stakeholders, not my own self-interest.
- I believe in, trust and build on the contributions of colleagues.
- I actively listen to my colleagues, align on goals and create better ways of working together.
- I support the success of others, encourage their feedback and appreciate what we all bring.
- I partner and share with others, to add value and achieve our goals.



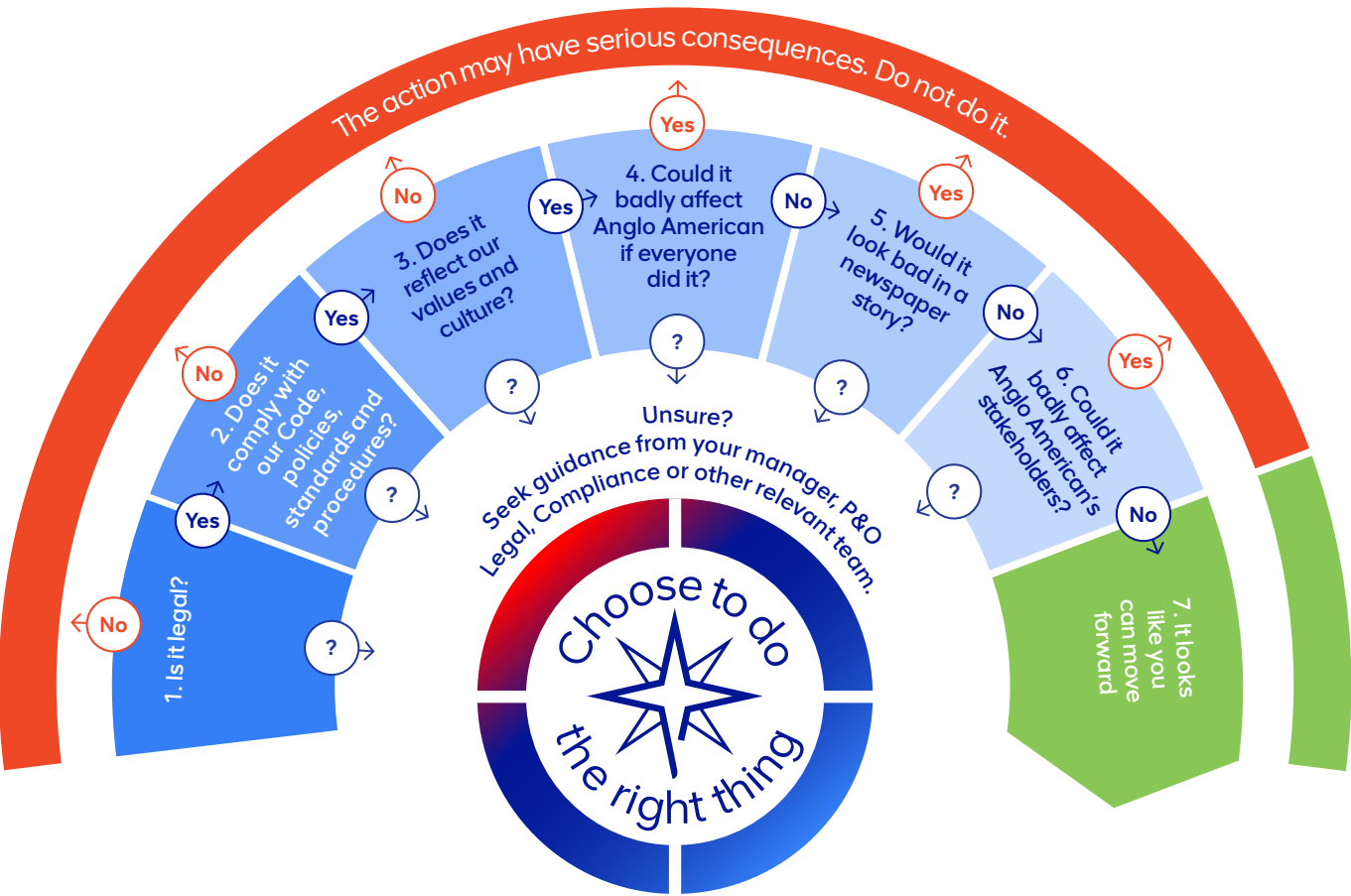
Innovation

We challenge assumptions, seek other perspectives and pursue innovative opportunities to transform our business.

- I constantly search for new ways of thinking and working, experimenting and learning all the time.
- I take considered risks in pushing the boundaries, assessing where the chances to improve outweigh failure.
- I accept the possibility of failure and learn from it.
- I simplify complexity and remove obstacles.
- I seek out and harness inspiration from inside and outside our organisation.

Making ethical decisions

Our Code covers many topics, but it does not cover every situation you may encounter. When you are in doubt about the right thing to do, we encourage you to ask for help. You can also use our step-by-step guide to think through difficult situations or decisions.

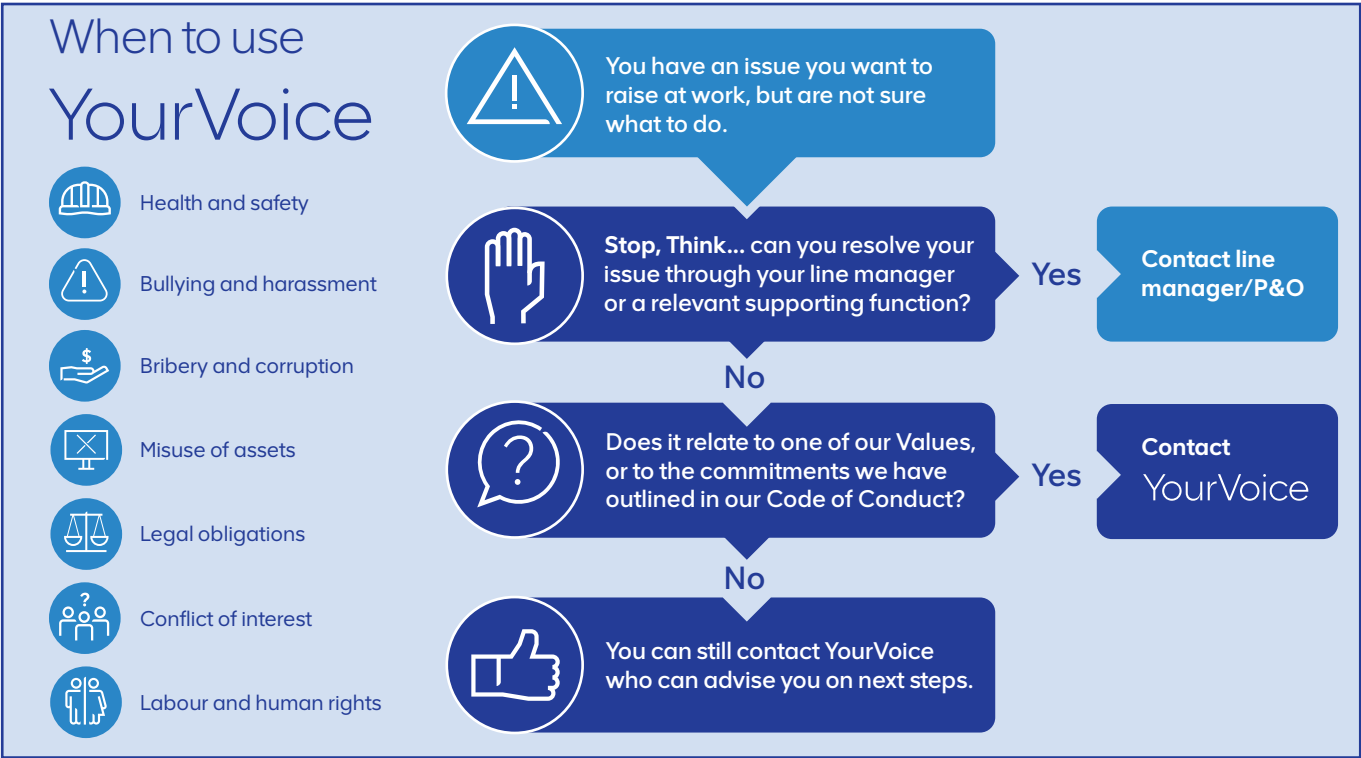


Raising concerns and YourVoice

If you see actions or behaviours which you think are a breach of our Code or might be illegal or unethical, you have a responsibility to bring this to the attention of Anglo American. This helps us to identify risks to our people, assets and communities, and demonstrates our unwavering commitment to do what is right.

You can do this in several ways:

- Your line manager should always be available to you as a point of contact to hear your concern.
- If you feel that you cannot talk to your line manager, then you can try to speak to someone who works in a relevant supporting function, such as Safety, Group Legal, People & Organisation or Group Ethics, Compliance & Investigations (ECI).
- If you cannot speak, or do not feel comfortable speaking, to any of the above, contact the YourVoice reporting service. You can do this via the YourVoice web platform at www.yourvoice.angloamerican.com, or by calling the YourVoice 24 hour helpline (you will find the local country numbers on the YourVoice website).
- To find out more about what happens to your report, see the Group Whistleblowing Policy.



YourVoice is operated by an independent, multilingual service provider and is available every day of the week at any time, day or night. YourVoice allows you to confidentially and, if you choose, anonymously report your concerns.

YourVoice can also be used by our contractors, suppliers, business partners and stakeholders to raise concerns about potentially unethical, unlawful or unsafe conduct and practices that contravene our Code.

Zero tolerance commitment on retaliation

We prohibit any form of punishment, disciplinary or retaliatory action (or threats or attempts of the same) being taken against anyone for raising or helping to address a business conduct concern. Retaliation is grounds for disciplinary action, including dismissal.

If you feel you or someone you know has been retaliated against, you should raise a concern immediately using the process outlined above.

YourVoice resources:
YourVoice website: www.yourvoice.angloamerican.com
Group Whistleblowing Policy

We commit to a high performance and purpose-led culture in which everyone demonstrates strong leadership. By doing so, we work together to maintain a safe and healthy workplace, protect the natural resources, ecosystems, and services around us, and to build and maintain thriving communities in the areas where we operate.

We prioritise safety, health and the environment (SHE)

The following principles guide our approach to SHE management:

- Zero Mindset** We apply the hierarchy of eliminating, avoiding, minimising, mitigating, remediating/rehabilitating and offsetting the SHE impacts and risks arising from our activities, products and services.

• No Repeats All necessary steps are taken to learn from SHE incidents, audit findings and other non-conformances and to identify opportunities for improvement to prevent their reoccurrence.

• Simple Non-negotiable Standards Simple non-negotiable Group and SHE management, performance standards and procedures are applied throughout the Group as a minimum requirement.

Safety

We believe that all injuries and incidents are preventable and apply a Zero Mindset across all our operations and activities. We individually take personal responsibility to maintain a safe and secure place of work. We seek to ensure that our operations have well-designed and well-maintained plants, equipment and infrastructure, and effective Safety, Health and Environmental (SHE) management systems.

We are committed to compliance with applicable local safety regulations and standards in addition to our own policies and requirements.

We seek to ensure that all our staff are appropriately trained and are competent to manage their own safety, the safety of their colleagues, and that safety standards are consistently applied across our operations. We are passionate in learning from incidents and in preventing recurrences. We expect our consultants, agents, business partners, contractors and suppliers to be familiar with and follow our policies and requirements on safety.



More on safety

Resources:

Group Safety, Health and Environment (SHE) Policy
Anglo American Safety, Health and Environment Way ("SHE Way")
Group Technical Standards (Standards Hub)
SHE Way and SHE Policy Eureka! sites
Group Contractor Performance Management Policy

Group Travel and Expense Policy and Standards

Group Processed Mineral Residue Facilities and Water Management Structures Policy

Who can I speak to?

Line manager
Safety representative
Head of Group Safety or any member of Group Safety

Always

- Know and follow the safety requirements and emergency procedures that apply to your work, including the Personal Protective Equipment (PPE) you must wear.
- Remain unconditional with respect to safety.
- Identify hazards and assess and manage risks.
- Look out for your fellow workers and raise any potential safety issues with them or your line manager.
- Deal with safety issues honestly and openly.
- Report all hazards, incidents, injuries and illnesses.
- Close out actions and apply learnings from safety incidents.
- Stop work if you think it is unsafe.

Never

- Start work you are not qualified to perform.
- Start work if you do not have the right equipment to do the work safely.
- Deviate from the work plan without a risk assessment and authority of your supervisor.
- Ignore a safety issue, however small it may seem.
- Turn a blind eye if safety controls are not in place, not being followed or do not work.
- Assume someone else will report a risk or concern; safety is everyone's personal responsibility.

Health

We believe that all occupational diseases are preventable and apply a Zero Mindset across all our operations and activities. We take personal responsibility to maintain a healthy place of work. We seek to ensure that our operations have well-designed and well-maintained plants, equipment and infrastructure, and work planning that is underpinned by effective workplace health management systems.

Providing health-promoting workplace environments is a legal and moral imperative for us. All employees and contractors should return home fit and well at the end of each shift and remain healthy during the course of their working lives and well into retirement. We have a key programme to identify and progressively eliminate health hazards at their source. We invest in holistic wellness programmes that support physically and mentally healthy lifestyles and promote emotional resilience and which result in improved worker engagement and productivity. We also support meaningful work modifications for employees with diverse needs, such as the management of long-term physical or psychological health conditions.

We are committed to compliance with applicable local health regulations and standards in addition to our own policies and requirements.



More on health

Resources:

Group Safety, Health and Environment (SHE) Policy
Anglo American Safety, Health and Environment Way ("SHE Way")
The Total Health Standard, and Guidelines Library
The Fatigue Management Standard and Guidelines
Health Eureka! site

Who can I speak to?

Line manager
Health and safety representative
Site and/or business occupational hygienist
Site Health services staff including an occupational medical practitioner
Business Health focal point
Group Head of Health or any member of Group Health

Always

- Proactively identify any potential health hazards and assess and manage the risks. This includes ensuring that the correct controls are in place and work well when undertaking daily tasks.
- Look out for your fellow workers and raise any potential health concerns with your supervisor and/or line manager.
- Ensure your current health status and functional capacities are compatible with the work that you need to do. Prioritise your health by seeking appropriate healthcare and confidentially report your health and wellness issues honestly and openly so we can support you to do safe and meaningful work.
- Report all health hazards including workplace exposure concerns, incidents, injuries and illnesses.
- Close out actions and apply learnings from health incidents.
- Stop work if you think it could result in immediate impacts to your health or lead to an accumulated excess exposure to a health hazard.
- Take personal responsibility for your own health by following mandated work processes and ensuring you consistently and correctly use the last line of defence – specified personal protective equipment (PPE).
- Take appropriate personal hygiene measures to prevent transmission of all relevant infectious diseases in the area(s) where you are working.

Never

- Start work that your current health status and functional capacities are not compatible with. This includes having all new medications checked and approved by the local health services.
- Ignore a health or wellness issue. Always seek a health professional's advice if you have concerns.
- Turn a blind eye if you have concerns about excess exposure to health hazards. This can include a required workplace environment control that is not in place, a health-saving rule not being followed or planned controls that do not work.
- Assume someone else will report an occupational health risk or concern; protecting ongoing health and wellness is everyone's personal responsibility.
- Fail to adhere to required work controls including the minimum mandatory PPE requirements.

Alcohol and drug use

Any employee, contractor or agency worker reporting to work must be free from the influence of alcohol, illegal drugs or any medication that may impair their ability to execute their duties safely. Consumption of alcohol, on or close to Anglo American premises by all staff carrying out operational work duties, is strictly forbidden.

We also prohibit the possession or consumption of illegal drugs at our work locations. We pursue a policy of educating our employees, undertaking testing, and providing support to those in need, to ensure that alcohol or illegal and unsafe drug use is not present in the workplace.

Always

- Report to work fit and ready to carry out your tasks.
- Advise your supervisor or manager if you have doubts about your fitness to work.
- Report situations where a work colleague is under the influence of alcohol and/or illegal drugs.
- Discuss with your line manager or P&O any situation where you suspect or know a colleague is taking prescription drugs which may impair their ability to work or otherwise pose a threat to safety.

Never

- Turn up for work when under the influence of alcohol or any illegal drug.
- Consume alcohol or illegal drugs during working hours on operational sites.
- Ignore substance abuse.

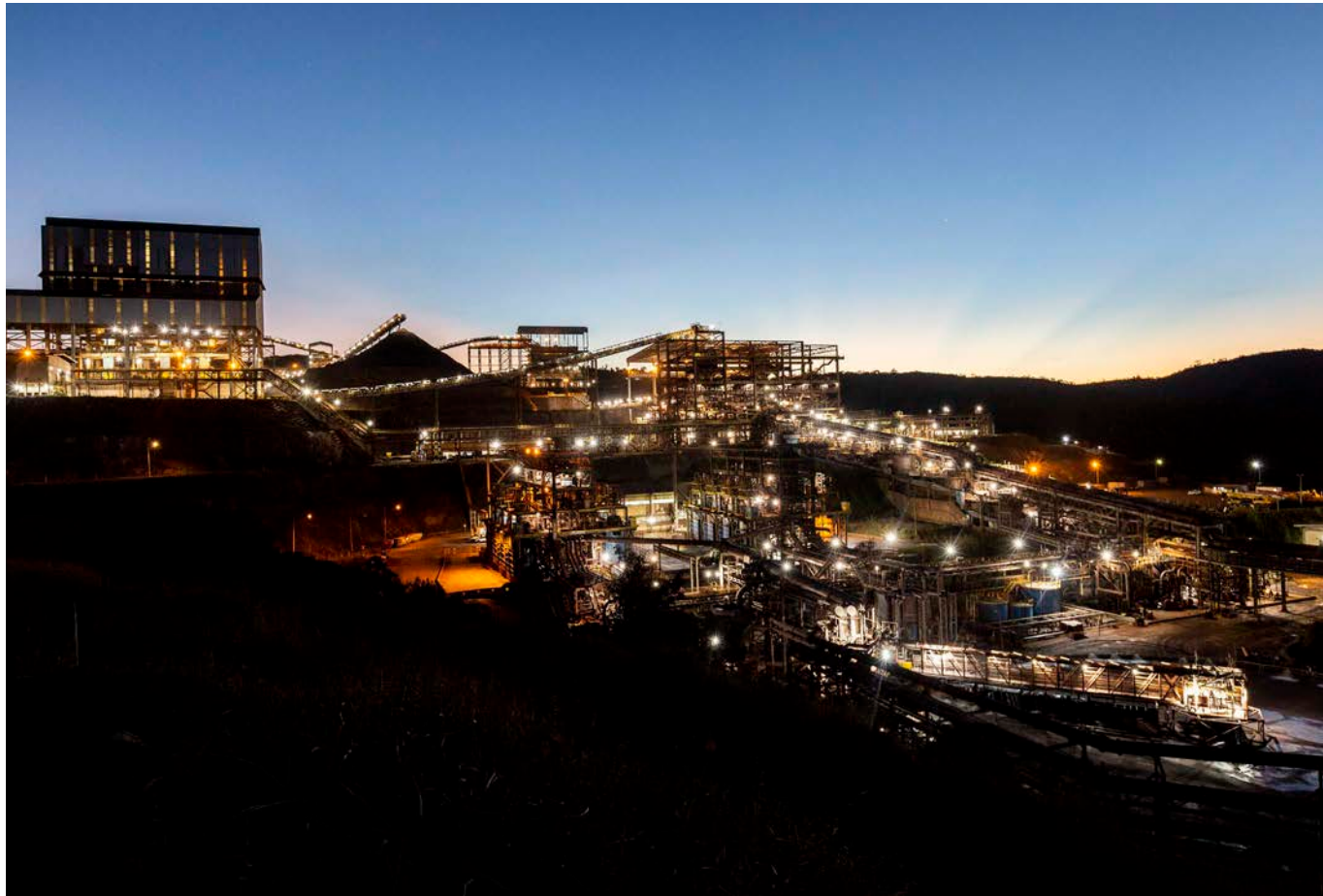
More on alcohol and drug use

Resources:

Group Drug and Alcohol at Work Policy
Local policies on Drug and Alcohol at Work
Local Employee Handbooks

Who can I speak to?

Line manager
Health and safety representative
People & Organisation



The environment

We minimise our impact on the environment by integrating environmental considerations into core planning, covering the full life cycle of an operation, from exploration to beyond mine closure. We are committed to adhering to legal requirements and Anglo American’s standards. We use natural resources, including water and energy, efficiently, recognising the needs of others with whom we share such resources and the economic benefits to our business. We do not accept that mining should compromise the well-being of communities who depend on ecosystems and their components: water, air, land and ecology. Our aspiration is to create innovative partnerships that generate positive outcomes for people and the environment.

We recognise the complex global challenge posed by climate change and our responsibility to take action to address its causes and protect our employees, assets and host communities against its potential impacts. We are committed to working in partnership and consultation with relevant stakeholders to help address the causes and impacts of climate change.

We aim to deliver nature-positive outcomes by avoiding, reducing, or offsetting environmental impacts, while restoring and rehabilitating ecosystems throughout an asset’s lifecycle. We respect legally-

designated Protected Areas and key biodiversity areas and commit to not exploring or mining within World Heritage Sites.

Always

- Understand the impact of your work on the environment (i.e. emissions, water, waste, nature, noise) and look for ways to minimise the impact as much as possible.
- Use risk assessment processes to identify any hazards to the environment when carrying out your work and ensure appropriate actions are taken to prevent or mitigate identified risks.
- Report any incidents or potential incidents that have or could impact the environment or any of its components (water, air, land, ecology).

Never

- Ignore a potential or actual environmental incident.
- Carry out work without the necessary environmental permits or authorisations.
- Carry out work that could be related to a designated protected area, species or habitat without first consulting with the appropriate environmental expert.

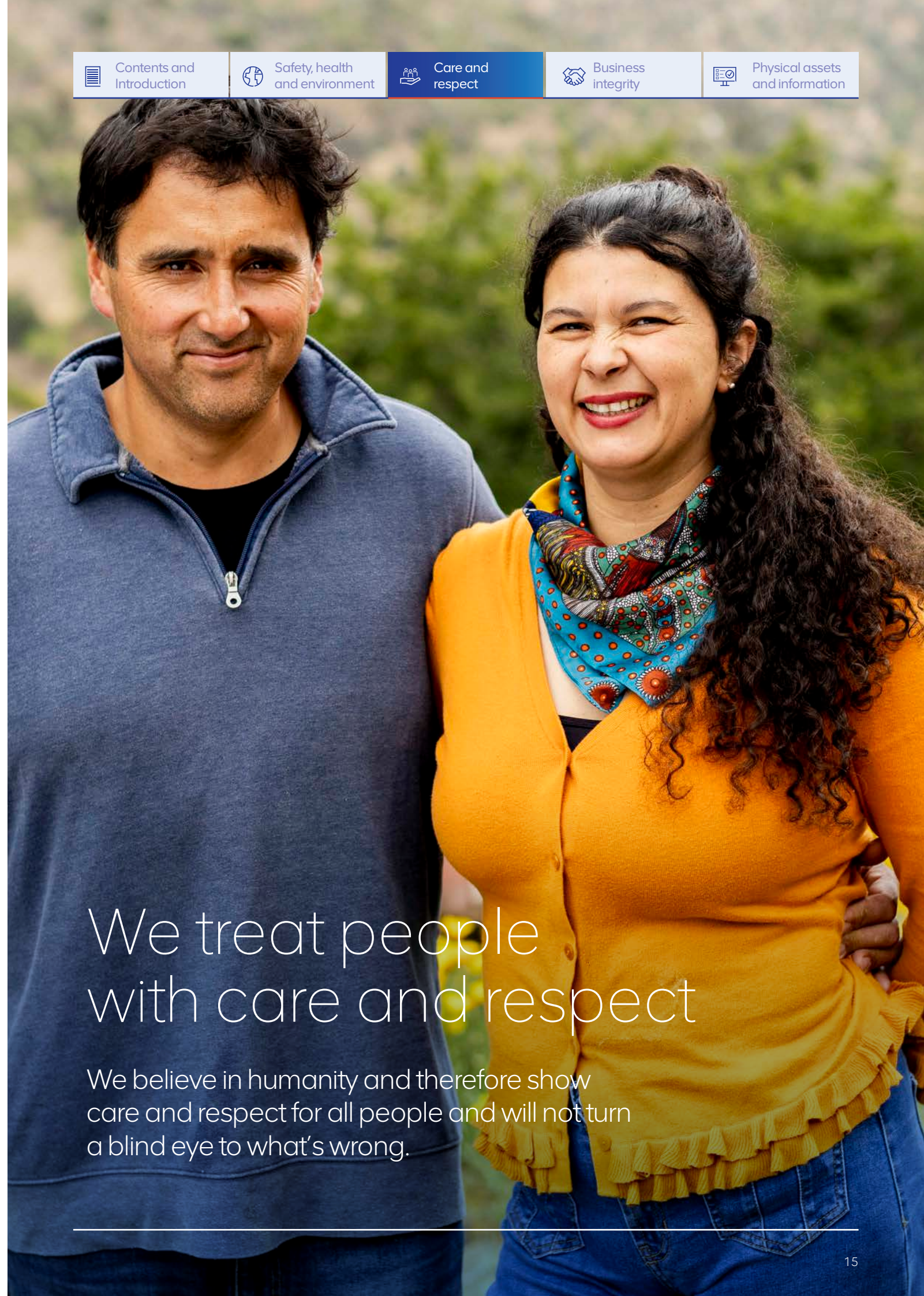
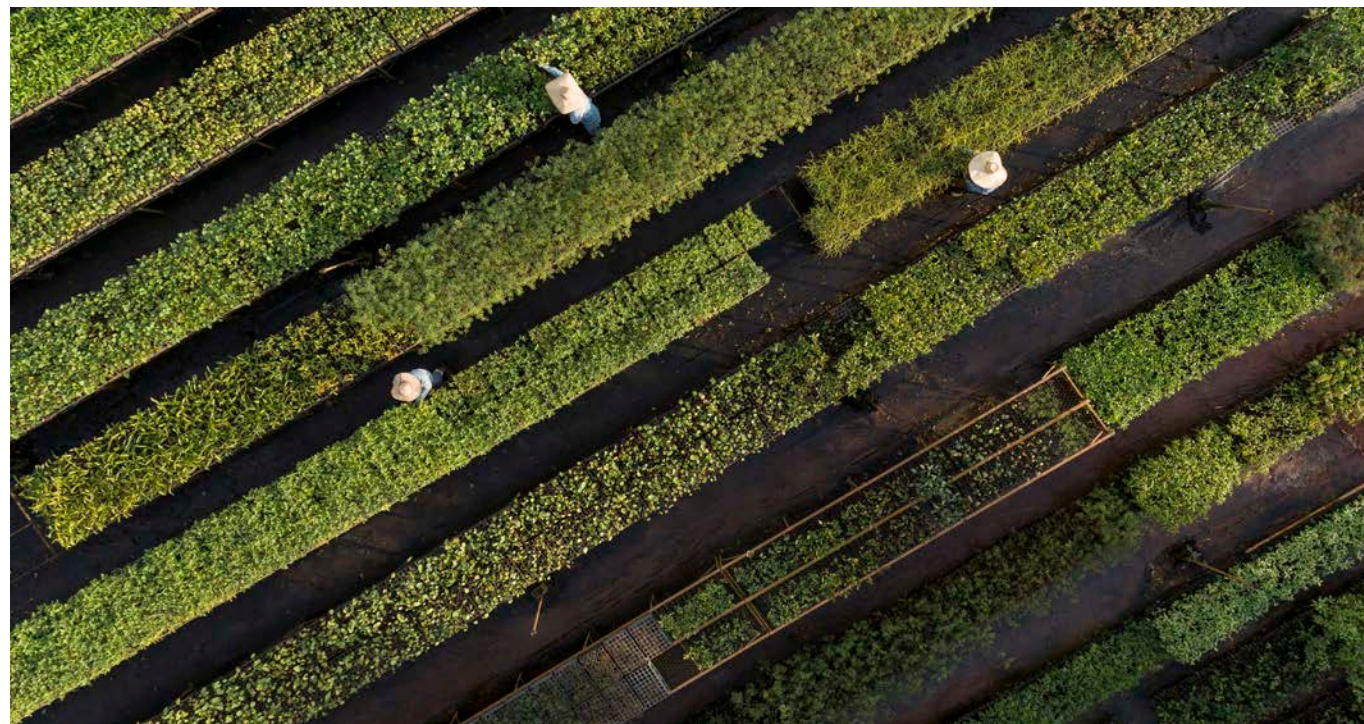
More on the environment

Resources:

Group Safety, Health and Environment (SHE) Policy
Anglo American Safety, Health and Environment Way ("SHE Way")
Group Climate Change Policy
Group Processed Mineral Residue Facilities and Water Management Structures Policy
Group Water Policy
Anglo American Social Way ("Social Way")
Group Technical Standards (Standards Hub)
Environment Eureka! site

Who can I speak to?

Line manager
Safety and Sustainability



We treat people with care and respect

We believe in humanity and therefore show care and respect for all people and will not turn a blind eye to what’s wrong.

We achieve our goals through our people and partnerships with our stakeholders. We are committed to our people and host communities and their development, and we value their diverse and unique contributions. We are focused on maintaining a work environment where our employees can develop and thrive and work with our host communities to create mutually beneficial relationships.



Labour and human rights

We have a fundamental commitment to respecting labour and human rights, driven by our Values. We demonstrate this through our observance of core principles and labour rights, being guided by relevant laws and regulations, being a signatory to the United Nations Global Compact and a supporter of the UN Guiding Principles on Business and Human Rights. Through ongoing due diligence and appropriate management, we aim to identify, assess and minimise potential adverse human rights impacts that we cause or contribute to, or that are linked to our business, including by suppliers or third parties acting on our behalf. We are committed to civic freedoms and the rule of law, including respecting the rights of human rights defenders. If our operations do impact these rights and freedoms, we aim to remedy and restore them as much as possible.

As a signatory to the Voluntary Principles on Security and Human Rights, we have made a commitment to maintaining the safety and security of our operations and staff within an operating framework that encourages respect for human rights via any necessary interactions with both public and private security providers.

We are committed to the International Labour Organisation’s fundamental labour rights, covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to modern slavery, forced labour, child labour and unfair discrimination.

More on labour and human rights

Resources:

Group Human Rights Policy
Responsible Sourcing Standard for Suppliers
Anglo American Social Way (“Social Way”)
Modern Slavery Act statements

Who can I speak to?

Line manager
Sustainability and Social Impact
Corporate Affairs
Supply Chain
People & Organisation
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)



Host communities

We are committed to making a lasting, positive contribution to the countries and communities where we operate. Maintaining open, robust engagement and collaboration with the communities affected by our operations – where many of our employees may also live – is a priority for us and is based on our Values of Care and Respect, and Accountability. We seek to share, plan and communicate with those communities transparently and honestly, and to engage with them in a way that avoids unethical behaviour and improper influence, or the appearance of either.

We want to create and maintain mutually beneficial relationships by understanding and maximising the positive influence we can have on local and regional development. We make charitable contributions and social and community investments to promote sustainable socio-economic development in the areas we operate, protecting the

environment and developing the capacities of people or institutions in the countries where we operate.

The Anglo American Social Way (“Social Way”) describes our framework for social performance, giving clear requirements for all Anglo American managed sites at all phases of development. Processes for planning and carrying out our mining operations must always aim to avoid or minimise adverse impacts on affected stakeholders, including vulnerable groups, and maximise development opportunities. The Social Investment and Donation Group policy sets out the key requirements that businesses should comply with when making social investments and donations.

We respect the rights, interests and perspectives of Indigenous Peoples, and take into account their unique and special connections to land, water and other natural resources.

More on host communities

Resources:

Anglo American Social Way (“Social Way”)
Group Social Investment and Donations Group Standard
Group Conducting Business with Integrity Policy
Group Anti-Bribery Standard: Social Investments and Donations
Group Human Rights Policy

Who can I speak to?

Group Social Impact
Business Social Performance managers
Site-based Social Performance managers
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)

Always

- Report any potential or suspected labour or human rights abuse, including suspected modern slavery, in our operations or our value chains – including those of our business partners.
- Undertake risk-based due diligence of higher-risk business partners (such as construction contractors or security providers) to assess their approach to respecting human rights.
- Encourage business partners and colleagues, including suppliers and contractors, to report any potential or suspected breaches.

Never

- Agree to any action likely to result in adverse impacts on the labour or human rights of fellow employees, local communities or other stakeholders.
- Neglect the rights of vulnerable and/or marginalised groups in our human rights due diligence process.
- Ignore human rights abuses in suppliers, customers and other partner organisations.

Always

- Follow the Anglo American ‘Social Way’ requirements when engaging with host communities.
- Follow the Group Social Investment and Donations Standard when engaging in social investment and donations activity.
- Be respectful, open and transparent in all engagement with communities.
- Seek advice from social performance specialists when engaging with host communities.
- Report and investigate stakeholder grievances and other incidents with social consequences.
- Put in place appropriate controls to mitigate the risk of social investment and donations being misused by third parties.

Never

- Make material operational changes without considering and managing impacts on host communities.
- Assume that responsibility for managing social issues rests only with site-based social teams.
- Exert any improper, unethical or illegal influence over any individuals in communities affected by our operations.
- Make commitments to communities without the proper authority and without recording them in site commitment registers.
- Allow social investment and donations to primarily benefit a particular government official, politician or party.
- Provide social investment or donations if they create, or have the potential to create, the perception of impropriety.

Equality (diversity, inclusion and fair treatment)

We promote an inclusive environment where every colleague is valued and respected for who they are and has the opportunity to fulfil their potential. We expect all colleagues to treat each other with care and respect, and are committed to ensuring that every individual can bring their whole self to work each day regardless of their gender, sexual orientation, age, race, ethnicity, religion, national origin or disability.

Inclusion is the key foundation of a psychologically safe workplace where all colleagues feel safe to continually learn, are empowered to ask questions, challenge ideas and contribute to achieving safe, responsible production.

Psychological safety underpins all our behaviours. It goes to the heart of our Values and our operating and organisation models, where innovation and technology combine with our world-class colleagues to fulfil our Purpose.

We believe our workforce should reflect the diversity of our partners, customers and the communities and countries where we operate. We set appropriate global goals for diversity at senior levels to ensure continuous improvement, to secure our future talent pipeline, and to commit to practices which help ensure that the careers of all colleagues are managed fairly and inclusively.

More on equality

- Resources:**
- Local employee handbook or P&O guidelines
 - Group Inclusion and Diversity Policy
 - Group Flexible Working Arrangements Policy
- Who can I speak to?**
- Line manager
 - P&O Business Partner
 - Group Inclusion & Diversity

Always

- Treat others as you expect to be treated yourself.
- Speak up about any discrimination or behaviour you see which you know is wrong.
- Appoint on merit, in line with resourcing policies and taking account of legal and affirmative action requirements in specific geographies.

Never

- Discriminate against anyone because of their gender, sexual orientation, age, race, ethnicity, religion, socio-economic background, national origin or disability, or any other legally protected characteristic, except where required by law.
- Disseminate or display materials that can reasonably be expected to cause offence because of their treatment of the above issues; for example, sexually explicit images.



Bullying and harassment

We aim to ensure that all colleagues are treated, and treat others, with care and respect and operate a zero tolerance approach towards bullying, harassment, sexual harassment, and/or victimisation in the workplace. This includes all global places of work, including business trips, all work-related events and functions, and social engagements with colleagues, during or outside of normal working hours.

Aligned to our zero tolerance approach to bullying, harassment and victimisation is our commitment to provide support for all our colleagues, regardless of gender and sexual orientation, who are survivors or witnesses of domestic violence or abuse.

More on bullying and harassment

- Resources:**
- Local employee handbook or P&O guidelines
 - Group Bullying, Harassment and Victimisation Policy
 - Group Policy on Recognising and Responding to Domestic Violence
- Who can I speak to?**
- Line manager
 - P&O Business Partner
 - Group Inclusion & Diversity
 - Domestic Violence Risk Assessors

Always

- Stand up for everyone.
- Speak up if you witness or experience bullying, harassment, sexual harassment or victimisation.
- Support vulnerable colleagues who may be experiencing abuse; be aware of the support available, and where and how it can be accessed.
- Remember the company aims to foster excellence and growth through supportive performance management. Unfavourable evaluations, when based on objective criteria, do not constitute a discriminatory act or violation of rights.

Never

- Behave in a way that undermines or humiliates an individual or violates their dignity.
- Make unwanted or inappropriate comments, suggestions or physical contact.
- Be a bystander to acts of bullying, harassment or victimisation.
- Never use your position or influence to pressure, intimidate or coerce anyone, or to gain any form of sexual advantage.





Personal information and privacy

We treat people with care and respect by respecting the privacy of individuals, and by complying with all applicable laws on the collection, storage, use, retention, transfer and deletion of personal data. Personal data typically includes any information about an individual person who can directly or indirectly be identified from that information. This includes anything from an individual's name or passport details, through to their opinions or other people's feedback on them.

We only process personal data lawfully and fairly, and will only keep that data for as long as it is strictly necessary for the purpose for which the data was collected.

We only share personal data with others when there is a legitimate business or legal basis to do so. We ensure that the transfer of that data complies with applicable data privacy laws and that anyone receiving personal data from us understands the importance of protecting that data.

Where we work with others, such as suppliers and consultants, we make clear the importance of our standards on data privacy. We respect the rights each of us has to receive, update and correct our personal data.

In the event of incidents involving personal data, Anglo American will comply with applicable laws and its Data Privacy Policy, including notification obligations where required.

More on personal information and privacy

Resources:

Group Data Privacy Policy
Group Personal Data Breach Response Procedure
Group Data Subject Rights Requests Procedure
Group Data Retention Schedule
Group Privacy Review Procedure
Employee Privacy Notice

Who can I speak to?

Line manager
Data Protection data.protection@angloamerican.com
Group Legal
Global IM Security

Always

- Consult the Data Protection team prior to starting a new project or activity that involves personal data.
- Keep personal data confidential, secure and protect it against accidental and malicious loss, destruction, damage and unauthorised disclosure.
- Process personal data only when we have a lawful reason to do so.
- Be transparent with individuals about what we are doing with their data.
- Inform the Data Protection team immediately of any suspected or confirmed personal data breach.

Never

- Access personal data without the appropriate authorisation.
- Share personal data outside of the organisation, unless appropriate due diligence has been conducted on the receiving organisation, and a suitable contract is in place.
- Store personal data on systems outside the Group's control.
- Share more personal data than necessary with colleagues and external parties.

Artificial intelligence

Artificial intelligence ('AI') is changing our business for the better, making our operations more efficient, streamlining our tasks, and giving us a real competitive edge. As AI becomes part of our everyday, it will change how we work. Our Group Artificial Intelligence and Machine Learning Governance Procedure and AI Centre of Excellence help us use AI responsibly.

We are responsible for the output from AI tools and accountable for the actions we take from the insights provided.

We ensure that our use of AI tools is ethical, upholds our Values and complies with the laws of the regions where we operate.

We have robust standards and methodologies to ensure that AI tools continue to provide a level of quality and so can deliver value for all stakeholders.

We believe that AI will transform our entire value chain, from productivity tools in the office to increased automation on site. These benefits also bring important risks we need to manage. When building or buying AI tools, we must review their impact on the lives of our employees, those in our communities and our wider stakeholders. To achieve this, we have integrated AI risk into our approach to governance.

More on artificial intelligence

Resources:

Group Artificial Intelligence / Machine Learning Governance Procedure and associated standards and guidelines
Artificial Intelligence Centre of Excellence Eureka! site
Group Data Policy

Who can I speak to?

Line manager
Artificial Intelligence Centre of Excellence aicoe@angloamerican.com

Always

- Use AI responsibly. Follow our internal process and standards. Ensure AI use is ethical, valuable to our business, and complies with the regional and global laws. Be accountable for the actions taken from the insights provided by AI tools.
- Use company-approved AI tools. This will ensure Anglo American's data is being used in a way that minimises the risk of data loss, personal data breaches and loss of our intellectual property.
- Be transparent about where you have used AI – add a disclaimer if outputs need additional validation or might be mistaken for human-generated content.
- Be aware that AI is in use at Anglo American, and information you see or engage with may be AI generated.
- Validate the outputs from AI tools – they may not always be correct. If you encounter incorrect, biased or harmful outputs from any AI tool, please report them to the AI Centre of Excellence.
- Experiment and learn – these are new, exciting technologies that will change our ways of working.

Never

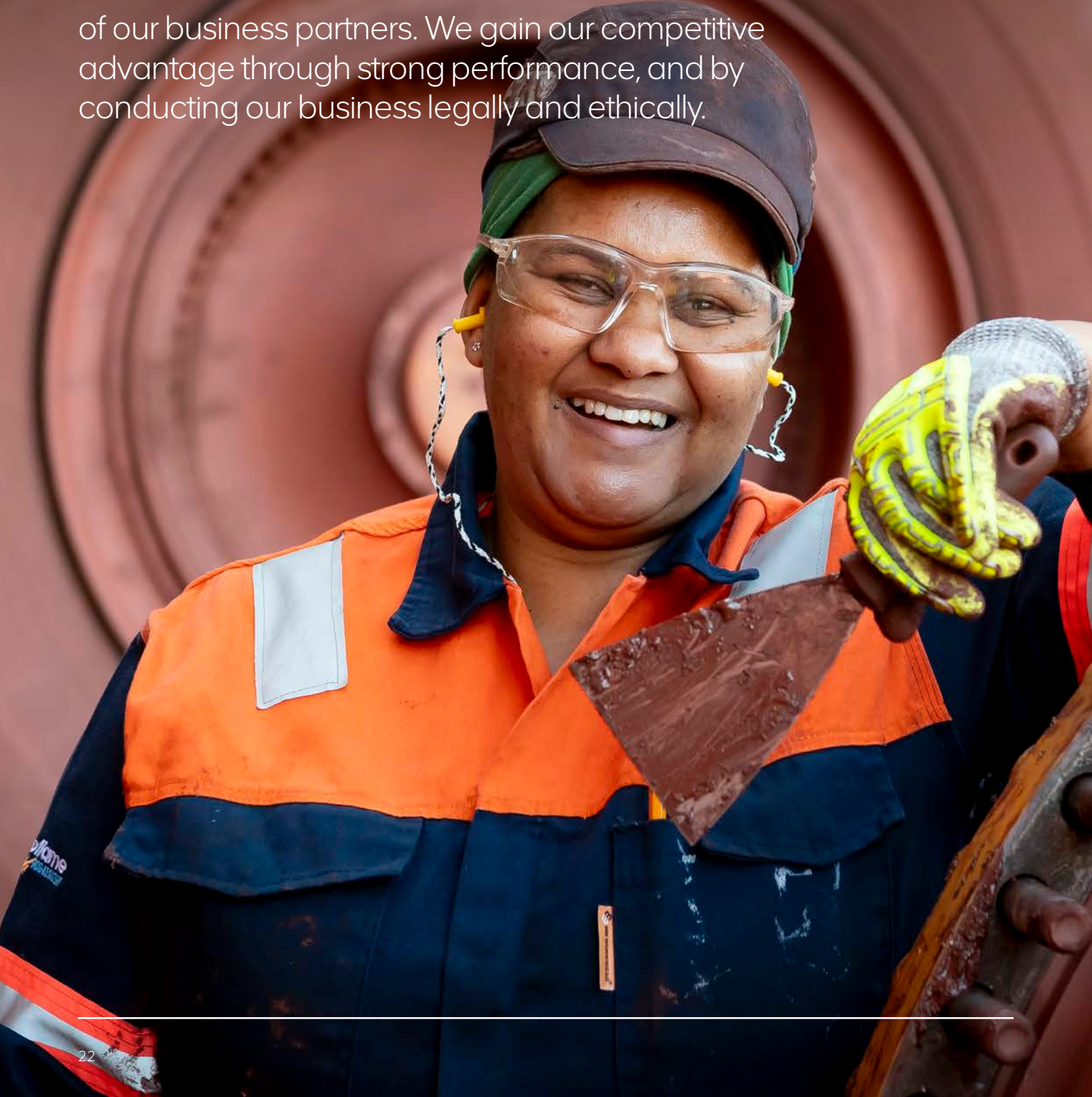
- Use AI tools that have not been approved by our company.
- Use AI to take any action that contradicts our Values and Group Policies.
- Generate, share or promote content that harms our commitment to safety, the environment or our business. This includes the development of false or misleading information, including deepfakes, that can deceive or harm individuals, groups, or the public.
- Give undue responsibility to Artificial Intelligence and Machine Learning systems.



We conduct business with integrity

We always act honestly, fairly, ethically and transparently.

We seek to build and maintain the trust and confidence of our business partners. We gain our competitive advantage through strong performance, and by conducting our business legally and ethically.



Suppliers and other business partners

We work with many business partners, including customers, suppliers, contractors, intermediaries, agents, advisers, and other third parties.

We expect our suppliers and other business partners to comply with the law and share our commitment to safety and sustainability, conducting business fairly and with integrity, and to protecting human rights.

We recognise that Anglo American’s reputation can be damaged by the actions of our business partners and in certain circumstances, we may be held responsible for their actions. It is never acceptable for a business partner to carry out an act on Anglo American’s behalf which, were it done by Anglo American directly, would be a breach of the law, this Code or our policies, standards and procedures.

More on suppliers and other business partners

Resources:

Group Conducting Business with Integrity Policy
 Group Policy – Supply Chain
 Supply Chain Standards and Guidelines
 Supply Chain Eureka! site
 Group Human Rights Policy
 Modern Slavery Statement
 Enhanced Intermediary Risk Management Eureka! site
 Know Your Counterparty (KYC) Eureka! site (Marketing)

Who can I speak to?

Line manager
 Group Supply Chain
 Marketing Regulatory & Compliance
 Compliance Business Partner
 Group Ethics, Compliance & Investigations (ECI)
 Group Legal



Always

- Treat business partners in an honest, respectful and responsible way.
- Investigate the background and reputation of prospective business partners, and follow the correct internal due diligence and onboarding procedures before doing business with them.
- Take steps to ensure that our business partners understand the importance we place on safety, sustainability, integrity and protecting human rights.
- Put in place the appropriate controls to monitor the business partner relationship.
- Fully engage in training and other learning initiatives – they are designed to help you manage these risks.
- Report any suspected unlawful or unethical behaviour by business partners or Anglo American staff.



Never

- Talk about pricing, share confidential information, or enter into commercial discussions with an existing or potential business partner unless you are following approved information-sharing protocols.
- Seek to bypass established due diligence and onboarding procedures.
- Encourage a business partner to do something in connection with its business dealings with Anglo American which would breach our Code or the law.
- Offer, provide, or accept anything of value from an existing or prospective business partner (such as gifts, entertainment, or hospitality) unless it complies with Group or local procedures regarding such matters. If you are uncertain, please seek guidance and obtain approval prior to proceeding.
- Provide any prospective or existing business partner with any unfair or improper advantage.

Working with institutional stakeholders

To help achieve our aim of safe, responsible mining that contributes to sustainable development, we engage with many governments around the world. This is how we shape effective public policy that relates to our business and the mining industry more widely, as well as broader public policy issues that are relevant to our business and our stakeholders.

We build constructive, lasting relationships with governments, contribute useful information and expertise, and engage with international organisations and civil society, directly and through our memberships of industry associations. Our aim is to help develop robust, informed policy and regulation and we are committed to contributing to the sustainable development and good governance of the countries where we work. It's why we support the Extractive Industries Transparency Initiative (EITI) and its efforts to allow citizens to see for themselves how their country's natural resources are being managed and how much revenue they are generating.

We also co-operate with government enquiries and investigations.

To avoid any potential perception of Anglo American exercising improper influence over decision-making, we do not support any political party, group or individual. We do not provide financial or other support 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.

We use our influence with all industry associations we belong to, ensuring that they operate in a way which is consistent with our Code. There should be no scope for any perception that Anglo American is exercising improper influence through its membership of industry associations, or any perception that we encourage industry associations to pursue policies and actions not aligned with Anglo American's Values, Code and Policies.

As individuals, our employees have the right to take part personally in the political process, including making personal political contributions. However, they must make it clear that such support arises from their personal political beliefs and is not related to Anglo American.



More on working with institutional stakeholders

Resources:

Local policies, standards, procedures and guidelines.
Group Government and International Relations Policy
Government Relations Handbook and Toolkit
Group Conducting Business with Integrity Policy
Group Anti-Bribery Standard – Interacting with Government Officials
Group Anti-Bribery Standard – Gifts, Entertainment and Hospitality

Who can I speak to?

Line manager
Corporate Affairs
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)
Group Legal

Bribery

We stand against corruption. Bribes and other corrupt payments are unethical, illegal and contrary to our Values. We neither offer, promise, give nor accept bribes, nor permit others to do so on our behalf, either in our dealings with government officials, the communities where we operate or with suppliers and customers.

Our employees are required to comply with our Conducting Business with Integrity Policy. We are committed to taking appropriate steps to ensure that our business partners also understand and comply with the principles in our Conducting Business with Integrity Policy when doing business with us or on our behalf.



More on bribery

Resources:

Group Conducting Business with Integrity Policy
Group Anti-Bribery Standards and Procedures
Local anti-bribery policies, standards and procedures

Who can I speak to?

Line manager
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)
Group Legal



Always

- Know who you are doing business with by ensuring that appropriate due diligence is conducted on business partners.
- Familiarise yourself with, and abide by, the Conducting Business with Integrity Policy and related standards and procedures.
- Contact your Compliance Business Partner, or Group Ethics, Compliance & Investigations (ECI), if you have any bribery or corruption related questions or concerns, e.g. if a third party attempts to influence you improperly, or if it could be seen that way.
- Fully engage in training and other learning initiatives – they are designed to help you manage these risks.



Never

- Offer or accept bribes, kickbacks, improper payments (including facilitation payments), or other advantages to or from third parties.
- Use Anglo American funds or resources, or personal funds on Anglo American's behalf, to make donations to political parties, or to support any political activity, candidate or party.



Always

- Read and follow all local and Group policies, standards, procedures and guidelines relating to interactions with government officials, political donations, the electoral process and conflicts of interest.
- Interact with government officials ethically and transparently.
- Seek your line manager's approval before becoming involved in a business activity concerning Anglo American that involves any political party or government official.
- Make sure your personal interests or activities do not create a conflict of interest for you as a representative of Anglo American.
- Exercise heightened caution in your dealings with government officials - they are a central focus of international anti-bribery legislation and represent a significant area of both perceived and actual corruption risk.



Never

- Attempt to obstruct the lawful collection of information, data, testimony or records by authorised government representatives.
- Use Anglo American funds or resources – or personal funds on Anglo American's behalf – to make political donations to political parties, or support any political activity, candidate or party.

Gifts, entertainment and hospitality

Our relationships with suppliers, customers and business partners, including governmental and other public bodies, are conducted on the basis of objective factors and are not influenced by the offer or acceptance of gifts or the provision or receipt of entertainment or hospitality. Our policies are not intended to prevent the establishment and building of legitimate business relationships.

Inappropriate and disproportionate (i.e. excessive or lavish) gifts, entertainment and hospitality can be seen as a way to try to gain an improper business advantage and amount to a bribe. Gifts, entertainment or hospitality offered to government officials carry a heightened risk of perceived bribery and always require careful consideration.



More on gifts, entertainment and hospitality

Resources:

Group Conducting Business with Integrity Policy
Group Gifts, Entertainment and Hospitality Standard
Local gift, entertainment and hospitality policies and procedures
Business Integrity Eureka! site
Disclose (disclosure tool for gifts, entertainment and hospitality)

Who can I speak to?

Line manager
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)
Group Legal



Always

- Consider if it's appropriate and proportionate to offer or accept a gift, entertainment or hospitality under the circumstances.
- Follow disclosure and approval procedures for gifts, entertainment and hospitality.
- Report conduct that may be perceived as an attempt to bribe.
- Remember that gifts, entertainment and hospitality involving government officials carry a heightened risk of perceived bribery. You should consult line management, and when needed your Compliance Business Partner, and/or Group Ethics, Compliance & Investigations (ECI), and/or Group Legal.

Never

- Offer gifts, entertainment or hospitality to gain an improper business advantage.
- Provide gifts, entertainment or hospitality from your own money to avoid an applicable policy, procedure or standard.
- Offer or accept gifts, entertainment or hospitality which are lavish, inappropriate or in cash.
- Offer or accept gifts that may create a sense of obligation, may create a conflict of interest, or be perceived to influence your or the receiving party's (business) judgment.

Conflicts of interest

Our employees, contractors and consultants must avoid actual or perceived conflicts of interest involving themselves, close relatives or associates. Where a conflict could arise, you must tell your line manager or P&O or your Compliance Business Partner and ensure that the conflict is managed appropriately.

A conflict of interest exists when your personal or professional interests or activities affect your ability to make clear, objective decisions for Anglo American.

Actual conflicts of interest must be avoided, but even the perception of a conflict of interest can be damaging to Anglo American and must be disclosed, discussed and managed to mitigate the risk as early as possible.

There are many ways that conflicts of interest could arise. For example, if you:

- are a board member of another organisation.
- have a material interest in a private company related to your work.
- have another job outside of Anglo American.
- have a close personal relationship with:
 - another employee at work whose salary, rating or promotion you can influence.
 - a representative of an existing or potential business partner or competitor of Anglo American.
 - a government official who can influence licenses, permits, or any other government approvals needed by Anglo American.

More on conflicts of interest

Resources:

Group Conducting Business with Integrity Policy
Group Conflict of Interest Procedure
Local business conflict of interest policies and procedures
Business Integrity Eureka! site
Disclose (disclosure tool for conflicts of interest)

Who can I speak to?

Line manager
P&O Business Partner
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)
Group Legal

Always

- Think about whether a situation may create a real or perceived conflict of interest.
- Discuss any possible conflict with your line manager or P&O or your Compliance Business Partner as early as you can and be open and transparent about the situation.
- Follow the policies, procedures and guidance that have been established for disclosing and managing conflicts of interest.

Never

- Hide or fail to disclose any actual, potential or perceived conflict of interest.



Fair competition

Healthy competition encourages us to continuously improve our products and services and how we bring them to market. If we do not compete fairly, people are ultimately worse off. It could also lead to heavy financial penalties, imprisonment for those involved, void contracts and harm our reputation.

That’s why we are committed to conducting our business in compliance with applicable competition laws (also known as antitrust laws) and expect our people not to engage in anti-competitive conduct.

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More on fair competition

Resources:

Group Conducting Business with Integrity Policy

Group Competition Law Standard

Who can I speak to?

Group Legal antitrust@angloamerican.com

Local Group Legal contact

Compliance Business Partner

✓

Always

- Consider whether the third party organisation you want to interact with is an actual or potential competitor to Anglo American.
- Contact Group Legal if a competitor discloses potentially competitively sensitive information to you, directly or indirectly, outside of arrangements approved by Group Legal.
- Obtain prior approval from Group Legal before joining an industry association.
- Fully engage in training and other learning initiatives – they are designed to help you manage these risks.
- Obtain information through lawful means.

✗

Never

- Reach an agreement or understanding with a competitor to:
 - fix purchase or selling prices
 - limit capacity, production or supply
 - boycott purchases from or sale to another business
 - allocate customers or markets
 - rig bids
 - share competitively sensitive information.
- Reach an agreement or understanding with a supplier or customer to fix resale price(s) or ban exports without seeking prior advice from Group Legal.
- Disclose confidential information to a competitor, directly or indirectly, without first discussing with Group Legal.
- Communicate false or misleading information on a competitor, its products or other services.
- Enter into any agreement or understanding with any company to avoid soliciting or hiring each other’s employees (‘no poach agreement’) or fix or coordinate wages.



Money laundering and the financing of terrorism

Anglo American is committed to compliance with all applicable laws relating to the prevention of money laundering and financing of terrorism. Money laundering is where criminals attempt to conceal the true origin and ownership of the proceeds of their criminal activities in otherwise legitimate business dealings. Terrorist financing is the provision of financial support to acts of terrorism or terrorist organisations.

Should any employee suspect that Anglo American might be or has been exposed to funds from a doubtful source or destination, they must report this to Group Legal.

All employees must immediately refer any enquiries from regulators or public authorities on these topics to Group Legal, and must not discuss this with anyone else, especially anyone they suspect to be involved in money laundering or other financial crime as tipping off a suspect is unlawful.

i

More on money laundering and the financing of terrorism

Resources:

Group Conducting Business with Integrity Policy

Group Anti-Money Laundering and Countering Terrorist Financing Standard

Who can I speak to?

Group Legal

Local Group Legal contact

Compliance Business Partner

✓

Always

- Know who you are dealing with – always follow our due diligence procedures before engaging with third parties.
- Raise concerns if you notice something which may look like money laundering and financing of terrorism.
- Fully engage in training and other learning initiatives – they are designed to help you manage these risks.

✗

Never

- Deal with criminals or get involved with money laundering and financing of terrorism.
- Fail to report suspected money laundering and financing of terrorism



Sanctions and trade controls

We are committed to compliance with all applicable sanctions and trade controls.

Many countries, regions and organisations, such as the UK, USA, European Union and the United Nations, have imposed trade sanctions against certain countries, organisations and individuals. Some countries penalise people and companies that undertake transactions prohibited by their sanctions’ regime even when there is no connection between the sanctioning country and the transaction.

Sanctions are complicated and far-reaching. Entering into a transaction with a sanctioned country, entity or person, or in respect of sanctioned products, is illegal

and could prevent or significantly hinder Anglo American’s ability to continue raising finance in the international debt markets. You must always check who you are doing business with and consult with Group Legal in advance of any touchpoint with a high risk or sanctioned country, entity or person.

The import or export of certain goods or services may be prohibited or subject to regulatory requirements (such as satisfying registration requirements or obtaining a licence). Certain equipment, software and technology may need to be classified in advance, with appropriate labelling, documentation, licences and approvals in place before it can be imported or exported.



More on sanctions and trade controls

Resources:

Group Conducting Business with Integrity Policy
Group Sanctions and Trade Controls Standard

Who can I speak to?

Group Legal
Local Group Legal contact
Compliance Business Partner

Tax

We are committed to compliance with relevant tax laws in all the jurisdictions in which we operate. We pay the right amount of tax at the right time in the countries where we do business.

We believe in openness and transparency. Our published Group Tax Strategy sets out our approach to tax and through our Tax and Economic Contribution Report, we disclose and report annually on our tax and economic contributions in each of our key operating jurisdictions.

Our commitment to compliance with relevant tax laws includes a zero tolerance approach to tax evasion. We are committed

to complying with laws that aim to prevent tax evasion and tax evasion facilitation. Tax evasion is a criminal offence; it means cheating the public revenue or fraudulently evading tax, generally by a deliberate action or omission, with dishonest intent. Tax evasion facilitation is knowingly helping another person in any way to fraudulently evade tax.

We take appropriate steps to ensure that our employees and business partners, including persons or organisations who perform services for or on behalf of the Group, understand and comply with our Anti-Tax Evasion Standard.



More on tax

Resources:

Group Conducting Business with Integrity Policy
Group Anti-Tax Evasion Standard
Group Tax Strategy
Tax and Economic Contribution Report

Who can I speak to?

Compliance Business Partner
Group Tax
Group Legal



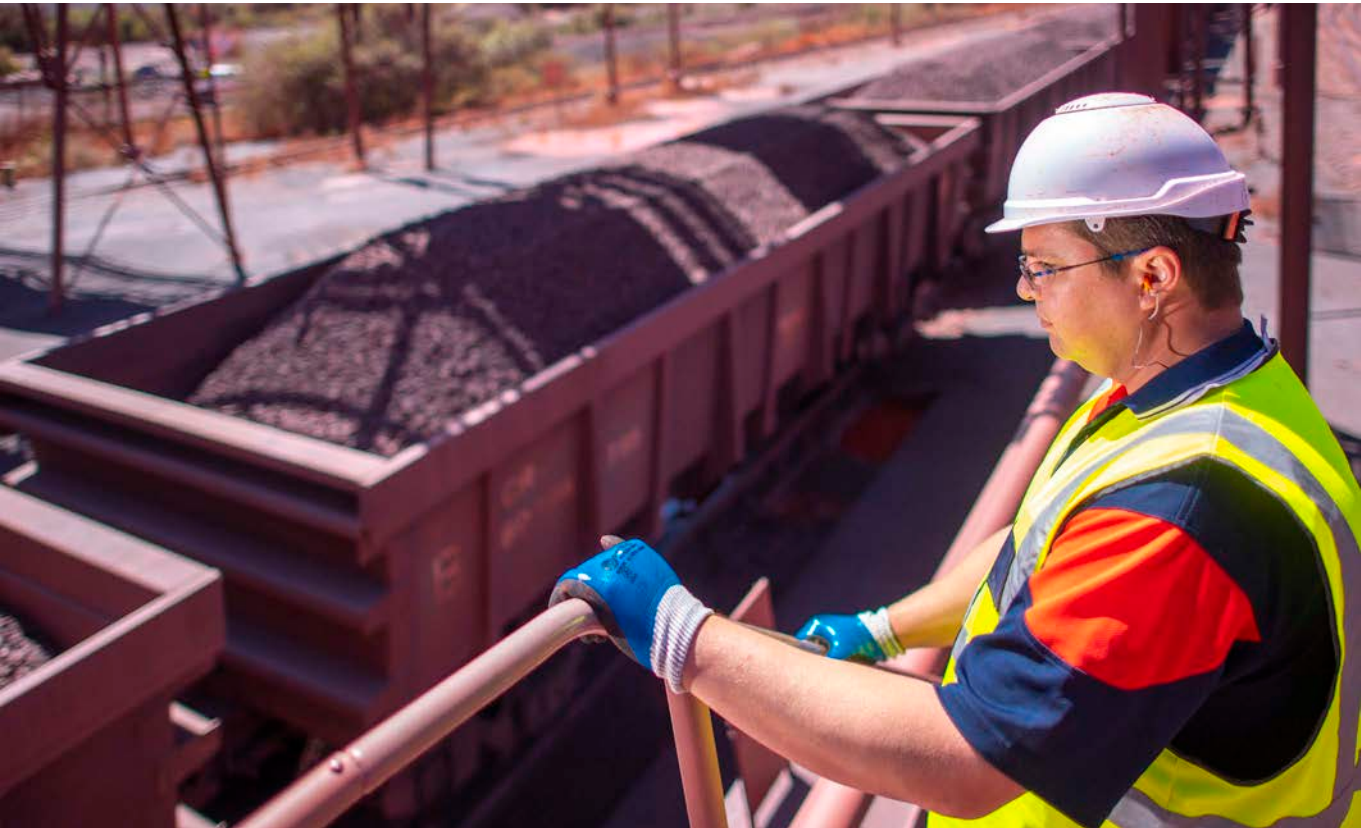
Always

- Know who you are dealing with – always follow our due diligence procedures before engaging with third parties.
- Check with Group Legal if you identify any connection with a sanctioned country, region, organisation or individual.
- Work out whether anything you are importing or exporting needs a licence or a prior registration.



Never

- Deal with a third party without conducting appropriate due diligence first.
- Import or export new products or services without checking whether they are subject to special regulatory requirements.



Always

- Follow the Group Conducting Business with Integrity Policy, the Anti-Tax Evasion Standard and our approach to tax as set out in the Group Tax Strategy.
- Act responsibly in relation to all tax compliance matters, respecting the laws of each country in which we operate.
- Raise concerns if you notice or suspect that a request or activity may concern tax evasion and/or the facilitation of tax evasion.
- Promptly report any incidents of facilitation of tax evasion.
- Fully engage in training and other learning initiatives – they are designed to help you manage these risks.



Never

- Engage in any form of tax evasion.
- Engage in any form of facilitation of tax evasion



Fraud

We stand against fraud. Fraud is the deliberate misrepresentation or omission of information and/or the abuse of position to obtain a gain for one party and/or create a loss for another. We are committed to ensuring that we (and anyone who acts on our behalf) do not engage in fraudulent activity, and to having reasonable procedures in place to prevent and detect fraud, and respond appropriately should it occur.

We take appropriate steps to ensure that our business partners understand and comply with the principles in our Group Conducting Business with Integrity Policy when doing business with us or on our behalf.

We support efforts to fight fraud worldwide and encourage our suppliers, customers and partners to do the same.



More on fraud

Resources:

Group Conducting Business with Integrity Policy
Group Fraud Risk Management (FRM) Standard
Fraud Risk Management Eureka! site

Who can I speak to?

Line manager
Compliance Business Partner
Group Ethics, Compliance & Investigations (ECI)
Group Legal



Always

- Read and abide by the Group Conducting Business with Integrity Policy and Fraud Risk Management Standard.
- Execute internal controls with excellence – many of which protect us against fraud.
- Raise your awareness – use available training and other resources to understand how fraud could impact your area of work and build your ability to identify potential fraud.
- Raise concerns – speak up and report suspected fraud through the available channels.
- Fully cooperate with any investigations when asked to do so and apply lessons learned from key investigations.



Never

- Commit fraud.
- Ignore suspected fraud – report it.
- Assume “it couldn’t happen here” — stay alert to unusual patterns, pressures or behaviours that may indicate fraud risk.
- Forget that your behavior, when you have responsibilities, can be used to show that we didn’t do enough to prevent fraud.



We protect our physical assets, information and interests

We value and actively protect Anglo American’s assets as if they were our own.

We protect the reputation, assets and shareholder value of Anglo American. We do this by protecting our resources, using them wisely and carefully, and by making sure we are honest and transparent about our operations and performance.



We protect the reputation, assets and shareholder value of Anglo American. We do this by protecting our resources, using them wisely and carefully, and by making sure we are honest and transparent about our operations and performance.

Security

We are committed to ensuring the security of our people, physical assets and products, and the continuity of our operations. This means ensuring that our people feel safe to perform to the best of their abilities wherever they are acting on Anglo American's behalf, that our products are safeguarded from initial point of extraction until they reach their customers, and that our property and critical equipment are protected in every location where we maintain a footprint.

We operate in accordance with international standards and the laws of the countries where we operate.

We expect our employees, contractors, consultants, and suppliers to comply with the security protocols and procedures applicable to the sites/projects, maintain an appropriate state of vigilance, and report any perceived security threats or suspicious activity to the local security team at the earliest and safest opportunity.

More on security

Resources:

Group Security Policy and associated standards and guidelines
Local security protocols and procedures

Who can I speak to?

Line manager
Local security team
Group Security groupsecurity@angloamerican.com

Always

- Adhere to the Group Security Policy and related standards.
- Comply with local security protocols and procedures.
- Maintain an appropriate state of vigilance and report to the local security team any perceived security threats, incidents, misuse or suspicious activity.

Never

- Fail to follow mandatory security protocols and procedures.
- Ignore reporting what you believe is a potential security issue or actual security incident – take responsibility for reporting these.



Information security and the protection of data

We are committed to information security, safeguarding our most valuable asset – our people – and the technology they rely on. A cyber attack has the potential to harm our colleagues and our company through a safety incident, loss of personal data, operational disruption and outages, large-scale financial losses and reputational damage. Our information security policies outline the behaviours and processes we must all follow to protect ourselves and our company from this significant risk. Everyone has a responsibility for information security and data protection, and we all have a role to play in preventing cyber attacks on our networks, business applications and data.

We aim to:

- realise our strategic objectives through the creation of a digitally-secure culture.
- prevent the loss or misuse of Anglo American information and data.

- ensure Anglo American meets its legal, regulatory and contractual obligations on information security, especially for highly confidential, confidential and personal data.

We expect all employees to take all practical measures to ensure the confidentiality, integrity and availability of Anglo American information. This means that each one of us is responsible for the data we produce, and must abide by our Information Security Policies, Standards and Procedures, to ensure that:

- only authorised individuals have access to Anglo American information.
- Anglo American information is trustworthy and accurate.
- reliable access to Anglo American information by authorised individuals is guaranteed.
- when data is shared with third parties, the risks and opportunities are evaluated and its use is controlled.



More on information security and the protection of data

Resources:

Group Information Security Policy and Standards
Group Policy for Acceptable Use of Information Technology (IT)
Group Data Privacy Policy
Group Data Policy
Group Third Party Data Sharing Procedure
Group Competition Law Standard

Who can I speak to?

Line manager
Global IM Security globalIMSecurity@angloamerican.com
Group Data Governance CoE data_governance_office@angloamerican.com
Data Owners

Always

- Familiarise yourself with the Group's Information Security and Data Policies and associated standards and procedures.
- Determine the information classification of a piece of information according to its value and sensitivity and keep it up to date.
- Apply the appropriate level of controls to secure the data according to its value.
- Only connect authorised Anglo American devices to the corporate network.
- Use only corporate solutions for instant messaging.
- Report suspicious cyber activity to Anglo American's Security Operations Centre via GlobalIMSecOps@angloamerican.com.
- Complete the mandatory annual Cyber Security and Data Privacy training.

Never

- Use unapproved public IT services for Anglo American information.
- Have 'Highly Confidential' or 'Confidential' conversations in public places or through non-corporate messaging applications such as WhatsApp.
- Click on website links or attachments from unknown senders, or if they look suspicious or were unsolicited.

Accuracy of data, information and records

We all record financial and non-financial information. We create data, information and records on a daily to annual basis. Data may include day-to-day activities such as telephone records, emails and operations data such as explosives used and materials moved. Information includes customer contracts, timesheets, expense reports, equipment availability and incidents. Our records include submissions to regulatory agencies and contributions to internal and external reporting.

Our stakeholders rely on the accuracy, completeness, timeliness, transparency and honesty of our data, information and records. All business records and information we create, in whatever form, must reflect the true nature of transactions and events. We must be open and honest about our recording and reporting of information, and be balanced in our communications considering both positive and negative impacts.



More on accuracy of data, information and records

Resources:

Group Financial Records and Reporting Policy
Group Data Policy
Group Information Security Policy and associated standards

Who can I speak to?

Line manager
Heads of Group Functions
Group Data Governance CoE
data_governance_office@angloamerican.com
Data Owners



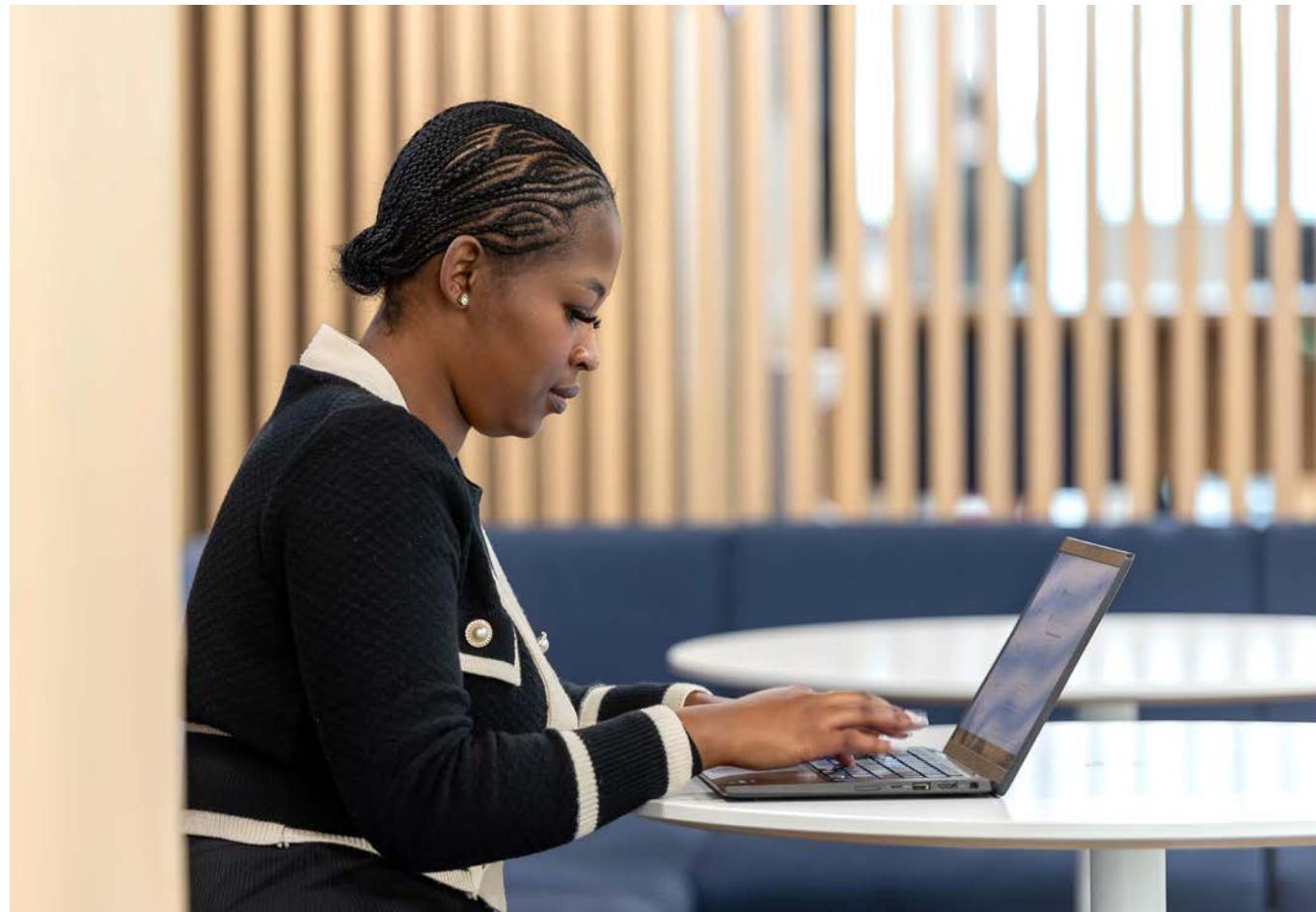
Always

- Make sure that all transactions and disclosures are properly authorised, recorded and reported.



Never

- Create false reports or records, or try to disguise what really happened.
- Destroy records unless authorised to do so.



Use, protection and care of Anglo American assets

We must all protect Anglo American's assets and property. These consist of facilities, property and equipment, including all mining and plant equipment, vehicles, computers and information technology (IT) systems, data, employee time, information and money.

We all have a responsibility to protect Anglo American's assets and resources against theft, loss, abuse, unauthorised access or disposal

Employees may only use Anglo American assets, including human capital, to carry out their Anglo American responsibilities or for other authorised uses.

We understand that we are an asset intensive organisation. Caring for our assets as per our Asset Performance Management Framework and other Technical Best Practice Principles is important to ensure that we operate safely, profitably, and sustainably.



More on use, protection and care of Anglo American assets

Resources:

Group Policy for Acceptable Use of Information Technology (IT)
Group Data Policy
Group Third Party Data Sharing Procedure
Group Conducting Business with Integrity Policy
Group Use of Company Assets Procedure
Asset Performance Management Framework
Technical Best Practice Principles (BPPs)

Who can I speak to?

Line manager
Local security team
Compliance Business Partner
Group Finance
Global IM Security globalIMSecurity@angloamerican.com
Group Business Intelligence and Data Analytics
Group Data Governance CoE
data_governance_office@angloamerican.com
Group Ethics, Compliance & Investigations (ECI)
Engineering and Maintenance



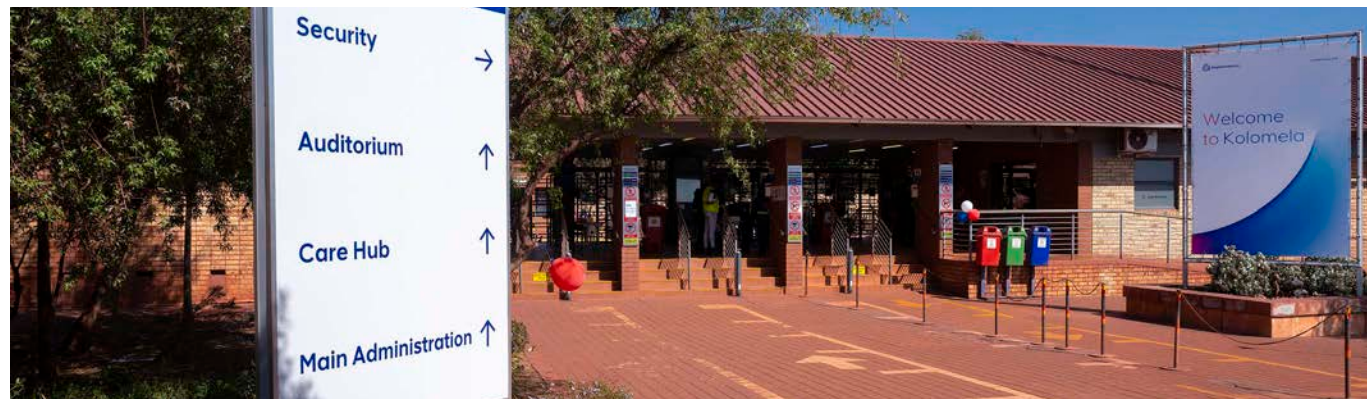
Always

- Prevent non-authorised personnel from accessing our facilities, information, data or other assets.
- Report any physical security issues discovered or suspected to the local security department for a follow-up investigation.
- Make sure valuable information is properly stored.
- Comply with Group Use of Company Assets Procedure when making our property available to third parties.
- Care for our plant and mining equipment, ensuring that equipment is correctly maintained and not misused.



Never

- Use Anglo American assets and resources for personal gain.
- Ignore security threats to assets.
- Offer the use of Anglo American property to influence a third party in connection with Anglo American's business or offer something which could be seen as a political donation.
- Use Anglo American's assets to access any form of offensive content.
- Use Anglo American's assets in a way that would breach the Group Policy on Bullying Harassment and Victimisation.
- Misuse and/or abuse our assets by overloading, over speeding, or running equipment outside of its safe operating limits.



Communicating externally

Our communication, both written and verbal, should be clear, accurate, consistent and responsible.

It must also comply with laws and regulations including those relating to Anglo American's stock exchange listings in London and Johannesburg. This means that only those who have been authorised to do so should communicate with the media or disclose corporate information. Communication with the media and external stakeholders, external speeches and presentations should be seen as opportunities that can, when properly managed and executed, protect and enhance Anglo American's reputation. All our external advisers are also subject to our Disclosure and Media Policy.

If you use social media and choose to mention anything in connection with Anglo American, you should remember that you are an ambassador for the company and should strive to protect the reputation of Anglo American by communicating in line with our Values.

If you wish to comment in your personal capacity on issues directly relevant to Anglo American you should always use your real name, be transparent about your affiliation to Anglo American, and make it clear that your opinions are your own and not those of Anglo American.

More on communicating externally

Resources:

Group Disclosure and Media Policy
Group Social Media Policy
Group Competition Law Standard

Who can I speak to?

Line manager
Corporate Affairs
Group Legal
Investor Relations

Always

- Consult early with Corporate Affairs before making any communication related to Anglo American, our businesses or projects.
- Provide advance notice to Corporate Affairs of activity likely to cause media and other external stakeholder interest.

Never

- Speak to the media without first consulting with Corporate Affairs.
- Publicise personal grievances through social media.
- Disclose information on Anglo American that is not already in the public domain without prior Corporate Affairs approval.



Sponsorship

Sponsorship, when adopted correctly, is a powerful tool that can be used to support key business objectives, including unlocking potential strategic opportunities by increasing awareness of who we are and what we do among key stakeholder groups.

Anglo American's definition of sponsorship is a mutually beneficial commercial agreement between Anglo American and

a sponsored party. A cash and/or in-kind contribution is made by Anglo American to the sponsored party (for example a charity or sporting event). In return Anglo American receives valuable commercial exposure/ publicity. The sponsorship must actively enhance our brand by showcasing who we are and what we stand for.

More on sponsorship

Resources:

Local sponsorship procedures and guidelines
Group Sponsorship Procedure

Who can I speak to?

Line manager
Corporate Affairs sponsorship@angloamerican.com
Compliance Business Partner

Always

- Conduct all sponsorship activity in accordance with the Group Sponsorship Procedure (covering agreed themes and approval processes), and local sponsorship policies and procedures.
- Ensure sponsorship activities are conducted transparently and ethically.
- Ensure sponsorship aligns with Anglo American's Values and are relevant to Anglo American's core activities and objectives.

Never

- Promise, offer or provide sponsorship in return for an improper business advantage.
- Engage in sponsorship that could create the perception of improper conduct or attempts to gain an improper advantage in business.
- Use sponsorship as a means to provide, or appear to provide, donations to politicians, political parties, related organisations, officials of political parties, or candidates for political office.



Insider dealing

It is illegal to deal in Anglo American or third-party securities or shares on the basis of inside information, or to encourage others to do so.

You may become aware of information about Anglo American which is confidential and which could influence anyone contemplating investing in Anglo American shares or securities. Inside information is information that has not been publicly disclosed, is precise and is likely to have a significant impact on the price of the share when made available. Employees are forbidden from using

Anglo American confidential or inside information for personal advantage or from sharing it with others for the same purpose.

We protect our organisation and our shareholders through responsibly managing confidential information. Confidential information includes technical information about products or processes, vendor lists, pricing, marketing or service strategies, as well as non-public financial reports and information about mergers, asset sales or acquisitions.



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More on insider dealing

Resources:

Group Dealing Policy

Who can I speak to?

Line manager

Company Secretarial

Group Legal

✓

Always

• Make sure you know how to classify and handle confidential information.

✗

Never

• Use inside information to gain personal advantage by trading in Anglo American or any third-party shares or securities.

• Share or provide tips to others (for example, family members) to gain advantage.

Contents and Introduction

Safety, health and environment

Care and respect

Business integrity

Physical assets and information

Intellectual property

Intellectual property refers to creations, inventions, industrial designs, artistic work and literature, symbols, names and images. Examples in the mining context include new mineral sampler designs, tailings facilities or processes for copper extraction or enrichment.

We identify, manage and protect Anglo American's intellectual property through patent protection, recording trade secrets, design rights, copyright, database rights, domain name registrations and trademarks. Our intellectual property gives us competitive advantage and protects our freedom to operate.

Unauthorised use of our intellectual property by third parties may damage our reputation and brands.

We respect the intellectual property of third parties, such as suppliers, competitors and customers, and we only use it where we are properly authorised to do so.

When undertaking research and development activities or creating original work, employees must keep accurate records of these activities, including the date on which the activities are performed, the persons involved in performing the activities and their position or role.

As set out in all employees' employment contracts or handbook, all intellectual property rights created, designed or made during any employee's work belong to Anglo American.

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More on intellectual property

Resources:

Group Intellectual Property Policy and Guidelines

Group Domain Name and Trademark Policy

Group Competition Law Standard

Who can I speak to?

Line manager

Group Legal

Group Tax

Group Technical

✓

Always

• Ensure that the creation of intellectual property is properly protected (including considering whether intellectual property needs to be assigned to the company when commissioning work from a third party).

• Report any suspected misuse of our intellectual property.

• Report any claims or allegations of infringement of third-party intellectual property rights.

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Never

• Share information relating to our intellectual property with others without obtaining proper authorisation to do so.

• Use third-party intellectual property unless you are authorised to do so.

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Anglo American Group Policies

Our Group Policies can be found on our Policy Hub.

We prioritise safety, health and the environment

- Group Safety, Health and Environment (SHE) Policy and the SHE Way
- Group Contractor Performance Management Policy
- Group Processed Mineral Residue Facilities and Water Management Structures
- Group Travel and Expense Policy and Standards
- Group Drugs and Alcohol at Work Policy
- Group Climate Change Policy
- Group Water Policy

We treat people with care and respect

- Group Human Rights Policy
- Group Social Way Policy
- Group Inclusion and Diversity Policy
- Group Flexible Work Arrangements Policy
- Group Policy on Bullying, Harassment and Victimisation
- Group Policy – Recognising and Responding to Domestic Violence
- Group Data Privacy Policy

We conduct business with integrity

- Group Supply Chain Policy
- Group Government and International Relations Policy
- Group Conducting Business with Integrity Policy
 - Group Anti-Bribery Standards and Procedures
 - Group Competition Law Standard
 - Group Sanctions and Trade Controls Standard
 - Group Anti-Money Laundering and Countering Terrorist Financing Standard
 - Group Anti-Tax Evasion Standard
 - Group Fraud Risk Management Standard

We protect our physical assets, information and interests

- Group Security Policy
- Group Information Security Policy
- Group Policy for Acceptable Use of Information Technology
- Group Data Policy
- Group Financial Records and Reporting Policy
- Group Policy for Reporting of Ore Reserves and Mineral Resources
- Group Communication Policy, covers:
 - Disclosure and Media
 - Social Media
 - Branding
 - Domain Name and Trademark
 - Sponsorship
- Group Dealing Policy
- Group Intellectual Property Policy

Other Group Policies

- Group Accountability Policy
- Group Whistleblowing Policy
- Group Enterprise Risk Management Policy
- Group Treasury Policy

Group terminology and responsibility

In this document, references to “Anglo American,” the “Anglo American Group,” the “Group,” “we,” “us,” and “our” refer to either Anglo American plc and its subsidiaries and/or those who work for them generally, or, where it is not necessary to refer to a particular entity, entities or persons. The use of these generic terms is for convenience only and does not indicate how the Anglo American Group or any entity within it is structured, managed, or controlled. Anglo American subsidiaries and their management are responsible for their own day-to-day operations, including, but not limited to, securing and maintaining all relevant licenses and permits, operational adaptation and implementation

of Group policies, management, training, and any applicable local grievance mechanisms. Anglo American produces Group-wide policies and procedures to ensure best uniform practices and standardisation across the Anglo American Group, but is not responsible for the day-to-day implementation of such policies. These policies and procedures constitute prescribed minimum standards only. Group operating subsidiaries are responsible for adapting those policies and procedures to reflect local conditions where appropriate, as well as for implementation, oversight, and monitoring within their specific businesses.

Prevailing language

The English language version of this document shall be controlling in all respects and shall prevail in case of any inconsistencies with translated versions, if any. Any other language versions of this Policy are provided for convenience only.

