

GISTM Disclosure Report: Helena Tailings Storage Facility



This Report summarises information related to the Helena Tailings Storage Facility (HTSF), including data specified by the Global Industry Standard on Tailings Management (GISTM)¹ Requirement 15.1 as well as a summary of current GISTM conformance levels.

This Report is organised in four sections, as follows:

- 1 – HTSF Description
- 2 – HTSF Risk Management
- 3 – HTSF Emergency Management
- 4 – HTSF GISTM Conformance Summary

This 2024 report is based on the commitments made by Anglo American PLC and accords with the current group structure and ownership. Appendix A includes a concordance table that maps the sections of this Report with each of the GISTM Requirement 15.1 disclosure criteria.

¹ GISTM is available from: <https://globaltailingsreview.org/global-industry-standard/>.

1 – HTSF Description

The HTSF is an inactive upstream constructed facility located south of the Concentrator within Anglo American Platinum’s Rustenburg Platinum Mines' South Africa-based Mototolo Operation. Figure 1 and Table 1 present the general arrangement and location of HTSF, and the key characteristics, respectively.

Figure 1. HTSF general arrangement and location

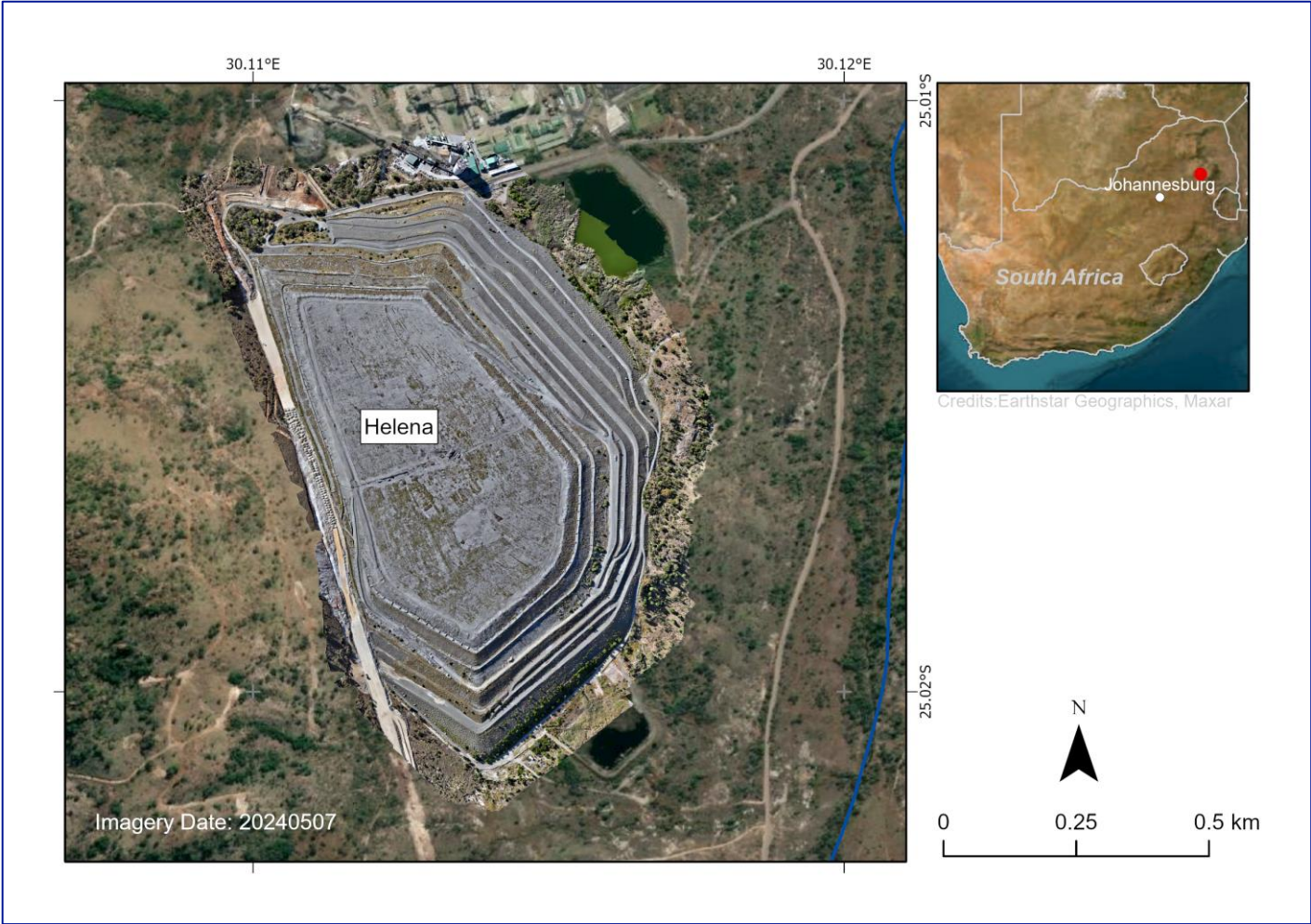


Table 1. Key HTSF characteristics

Description		Comment
Organisation	Anglo American Platinum (AAP)	Owned and operated by Rustenburg Platinum Mines, a wholly owned subsidiary of AAP, the HTSF is a component of its Mototolo Operation, the main activity of which is the mining of Platinum Group Metals (PGMs) using underground mining methods.
Facility Location	South Africa (-25.01605, 30.11316) ²	Situated on the farm Helena 6JT within the Sekhukhune District Municipality and the Greater Tubatse Local Municipality in South Africa.
Lifecycle Status	Inactive	The HTSF was commissioned in 2006. Final deposition occurred in December 2020, and the HTSF is no longer operational.
Consequence Classification	Very High	This rating was assessed using the GISTM Consequence Classification Matrix.

² Location coordinates provided in decimal degrees (latitude, longitude).

Description		Comment
Construction Method & Summary	Upstream constructed facility ³	<p>The HTSF commissioning phase consisted of constructing two rockfill starter walls along the south and northeastern flanks of the tailings facility footprint. These walls were required to contain the initial tailings product and demarcate the downstream limit of the facility. Tailings slurry distribution lines were installed within the starter dam infrastructure, and the facility was extended/raised following the upstream method to full height by cyclone deposition (i.e., with tailings material pumped via a pipeline from the Mototolo Concentrator).</p> <p>In 2017 seepage was observed along the HTSF outer wall. A site investigation was undertaken, and the decision was made to construct a waste rock buttress to improve stability. Further analyses and re-evaluation of the buttress configuration requirements for long-term stability and facility closure implementation are ongoing.</p>
Key Appurtenant Structures	Return water dams, penstock-decant system	Facility drainage and surface water management is provided by an integrated internal toe drainage, penstock-decant and return water dams (A & B) infrastructure system.
Height (m): Current / Final	67 / 67	As the facility is inactive, the current and final heights are equivalent.
Downstream Slope Angle	3H : 1V	Overall slope angle (without buttress).
Tailings Storage Volume	14.9 Mm ³	Total facility volume.
Closure Plan Summary	Closure cover - landform (no pond)	The HTSF closure planning includes top-soiling and vegetation of the outer slopes and top surface (i.e., beach and previous pond area) to facilitate eva-transpiration and reduce net infiltration to lower the phreatic surface. Studies are ongoing to optimise and refine the HTSF closure plan.
Confirmation of adequate financial capacity to cover estimated closure costs ⁴	Confirmed	<p>Financial capacity is assessed for the Anglo American Group as a whole, of which the HTSF forms part.</p> <p>Based on the 2023 Integrated Annual Report we have considered the Group's cash flow forecasts for the period to the end of December 2025 under base and downside scenarios with reference to the Group's principal risks as set out within the Group Viability Statement included within the Integrated Annual Report. Specific to closure requirements we have costed the most recent closure plan and assessed whether Anglo American's financial capacity is sufficient to cover the estimated liability by reference to the Group's net asset position compared to its closure liabilities for tailings facilities.</p> <p>Based on this information, we are satisfied that the Group's forecasts and projections, taking account of reasonably possible changes in trading performance over the assessment period, indicate the Group has adequate financial capacity (including insurance, to the extent commercially reasonable) to meet the closure requirement obligations for the tailings facility in its current state as those requirements fall due.</p>
Independent Reviews	Most recent and planned	The most recent Dam Safety Review (DSR) was conducted in 2023, and depending on the AA organisational changes taking place, the

³ Upstream constructed dam means the embankment crest moved inward towards the pond with successive raises.

⁴ Refer to GISTM Requirement 15.1 Part B.10 for the full requirement description.

Description	Comment
	<p>next instance is planned for 2028, which is in accordance with the occurrence frequency indicated by GISTM.</p> <p>Independent Technical Review Board (ITRB) reviews are conducted annually, with the most recent review conducted in May 2023. An independent assessment on groundwater and geochemistry was completed in 2023.</p>

2 – HTSF Risk Management

The Anglo American TSF risk management system comprises a series of interrelated and mutually reinforcing elements focussed on preventing and mitigating the potential impacts of ‘collapse’ and ‘overtopping’ failure modes, as well as other ‘environmental’ source-pathway-receptor type impact mechanisms (e.g., groundwater impacts). Figure 2 illustrates these key modes and mechanisms, within a conceptualised TSF cross-section and presents a simplified ‘process wheel’ overview of key TSF risk management system elements. Table 2 summarises the TSF risk management system elements. The Anglo American TSF risk management system has been updated to provide a framework to seek to ensure that all risks are well understood, communicated, and managed, which includes means to assess appropriate risk reduction measures.

Figure 2. Failure mode categories and risk management framework summary

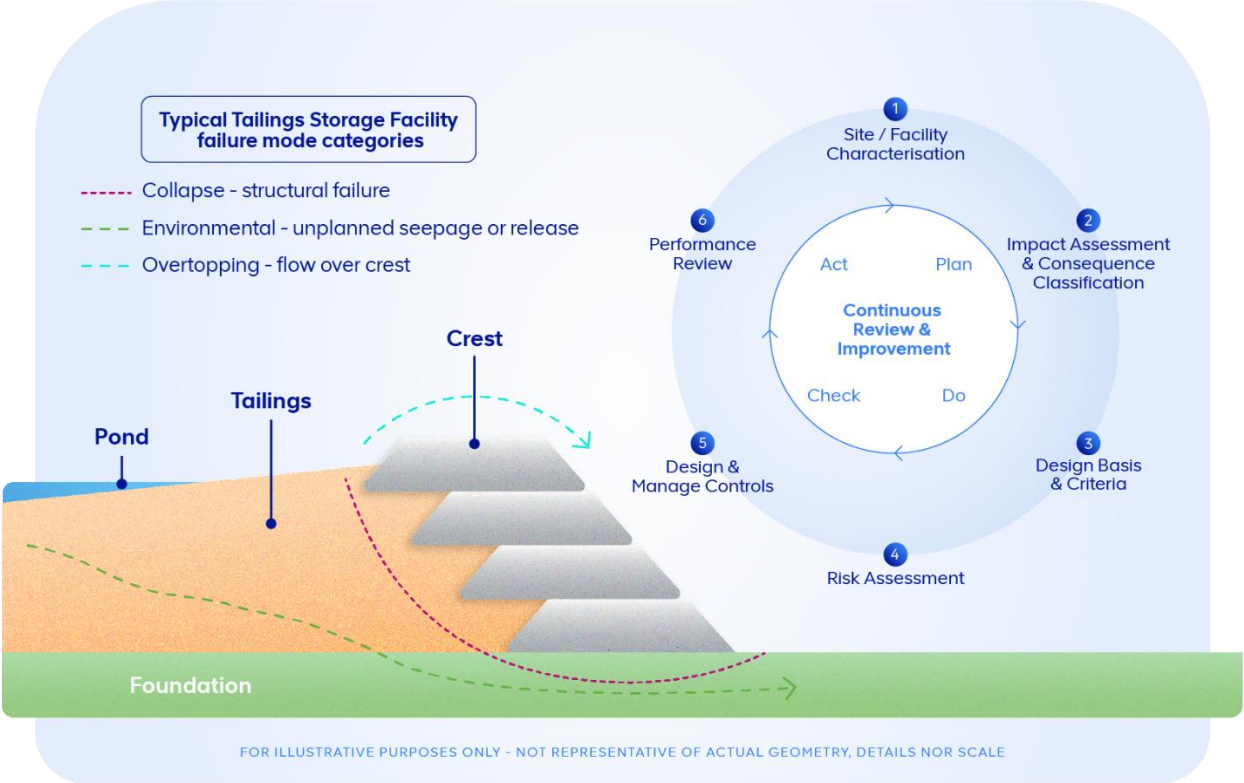


Table 2. Summary of Anglo American TSF risk management system elements

Element	Comment
1. Site / Facility Characterisation	TSF investigation programs are executed to improve failure mode understanding and management strategies, with the ultimate aim of developing and implementing facility closure plans.
2. Impact Assessment & Consequence Classification	<p>Based on a review of theoretical TSF failure scenarios (i.e., deemed physically admissible), the modelled area of impact is estimated and rendered on inundation maps. This area is used to inform the potential TSF impacts and the associated consequence classification. The modelled impact area and consequence classification assists with the design of risk management strategies, including mitigative measures such as emergency management planning.</p> <p>The consequence classification characterises the potential for damage and loss in the unlikely event of TSF failure. A multi-disciplinary team assesses the overall consequence classification rating by selecting the highest rating level amongst safety, social, environmental, infrastructure and economic impact subcategories. A consequence classification rating does not consider the likelihood of failure (i.e., only modelled potential impacts). As such, this rating does not convey a risk level; but rather serves as an input to the TSF design basis & criteria development process.</p>

Element	Comment
3. Design Basis & Criteria	The consequence classification informs the key loading criteria (e.g., 'extreme' earthquake or storm conditions) to be used for the design and operational control aspects of the risk management system (i.e., to prevent failure modes). Design basis & criteria are also established for environmental impact mechanisms, as applicable.
4. Risk Assessment	Risk assessment is the systematic review of potential failure modes and their control strategies. This is part of a continuous review process which benefits from the collection and assessment of site and facility characterisation data throughout the TSF lifecycle.
5. Design & Manage Controls	Supported by the above activities - design ⁵ , operational ⁶ and mitigative (such as emergency management; refer to section 3) ⁷ control strategies are designed, implemented, tracked and continuously improved to manage risks. Control strategies include processes such as Trigger-Action-Response-Plans (TARPs) to promote early identification of potential performance issues and define mitigation methods that can be implemented to avoid issue escalation and reduce potential impacts.
6. Performance Review	Technical, environmental and social performance review and monitoring are undertaken as part of the tailings facility and risk management system.

Table 3 summarises material findings and mitigation measures from risk assessment, dam safety/performance review, and environmental and social monitoring programs.

Table 3. HTSF performance review and risk findings

Recommendations summary	Status of mitigation measure(s)
Dam safety monitoring	
Develop a master execution plan for undrained and post-earthquake stability assessments, including a seismic hazard assessment to inform deformation analyses.	<ul style="list-style-type: none"> Buttress construction was completed in 2018⁸, and analyses are ongoing to satisfy long-term closure configuration. A plan is in place, which includes ongoing in situ investigations, installation of supplementary monitoring equipment, performing laboratory testing and geotechnical analyses. A site-specific seismic hazard study was completed in April 2023, and the updates to deformation analyses have also been completed.
Environmental monitoring	
Integrate the management of groundwater aspects into the Tailings Management System.	An independent assessment of groundwater and geochemistry was completed in 2023. Management plans are being implemented.
Social monitoring	
Mototolo / Der Brochen site has a functioning grievance management process in place and is working towards full implementation of a social management system as required by our Social Way 3.0 Standard.	No grievances were received in relation to tailings management for Helena TSF.

⁵ Design controls typically take the form of required TSF configurations (e.g., embankment slope angle, crest width) and construction material property control.

⁶ Operational controls generally include standard operation procedures, surveillance (e.g., instrumentation, visual inspection) and ongoing maintenance activities.

⁷ Mitigative controls typically focus on emergency management preparations and planning that could potentially result in on-site or off-site impacts.

⁸ 2023 Disclosure indicated buttress construction completion in 2020, this was changed to reflect the actual year of completion.

3 – HTSF Emergency Management

The HTSF Emergency Management (EM) framework describes how the Mototolo operation prepares for, responds to, and expedites recovery from potential emergencies and crises. This framework is informed and supported by the Anglo American Group resilience, emergency and crisis management policies, standards, specifications and plans, the Group Mineral Residue Facilities Standard and other TSF requirements.

The activation of the response and recovery plans, within the HTSF EM framework, is a critical mitigative control to reduce on-site and off-site consequences in the unlikely event of a HTSF failure. The HTSF EM framework is structured around four key elements; namely: 'Prevention & Mitigation', 'Preparedness', 'Response' and 'Recovery'. Table 4 presents a summary of the HTSF EM framework organised by these elements and the associated key questions which are addressed.

Table 4. HTSF EM framework summary

Element	Key question(s) ⁹	How the framework addresses these questions
Prevention & Mitigation	What are HTSF risks, and how does Anglo American identify, monitor, reduce and control them?	<p>Section 2 presents the HTSF risk management system. This system focuses on the prevention of TSF failures. 'Prevention & Mitigation' includes control strategies, processes and systems, such as TARPs. These strategies and processes promote early identification of potential performance issues and define mitigation methods that can be readily implemented to avoid issue escalation and minimise any impacts.</p> <p>A HTSF monitoring system is in place, which includes, but is not limited to, ongoing physical/visual inspections (e.g., detection of seepage, erosion, cracking) and review of control performance data, such as climate readings, freeboard, pore pressure and deformation. In addition, loading events such as an earthquake or extreme storm would trigger an immediate review to assess and decide whether the EM process should be initiated.</p>
	What HTSF emergency preparedness plans are in place?	HTSF EM Plans and procedures have been developed, incorporating feedback from local authorities and affected communities.
	Who could be potentially impacted in the event of an HTSF emergency?	Potentially impacted stakeholders have been identified based on the estimated HTSF inundation area. These potentially impacted stakeholders are being engaged and familiarised with EM programs, including through emergency response simulation exercises as needed.
Preparedness	Who are the HTSF emergency response participants, and what are the established roles, responsibilities and required resources?	<p>The Anglo American response to an emergency follows a three-tiered approach:</p> <ol style="list-style-type: none"> 1. The site-based Emergency Controller and Emergency Management Team (EMT) are responsible for the immediate emergency response. The Emergency Controller will coordinate and manage communication with the AAP Crisis Management Team (CMT), the initial notification of potentially impacted people, external emergency services and the regulatory authority. The EMT will conduct the initial emergency response, in conjunction with external emergency services. 2. The AAP CMT is responsible for: <ol style="list-style-type: none"> a. Coordinating a large-scale emergency that impacts areas away from the mine site; and,

⁹ These questions are intended to be from the perspective of 'potentially impacted stakeholders'.

Element	Key question(s) ⁹	How the framework addresses these questions
		<p>b. Supporting the site-based emergency response, and communicating and coordinating with potentially impacted people (e.g., communities, neighbouring mine operations) and regulatory authorities.</p> <p>3. The Anglo American corporate office (London, UK) crisis management team provides support to the AAP CMT.</p>
	How does Anglo American check HTSF EM Plan implementation and operational readiness?	<p>Anglo American tests and checks the HTSF EM Plan implementation and operational readiness by conducting internal and external emergency exercises, assessing areas for improvement and closing the identified gaps.</p> <p>The emergency exercise program makes potentially impacted stakeholders aware of notifications and the alarm, which is located at the site. Evacuation routes are practised.</p> <p>The most recent HTSF emergency exercise was carried out in the form of an emergency simulation drill in July 2023.</p>
Response	How will Anglo American respond to an HTSF emergency, including notifications to potentially impacted stakeholders? What should these stakeholders do?	In the event of an escalating HTSF failure situation, the decision to implement the evacuation process will be made in a precautionary and progressive manner. The EMT will notify and engage with potentially impacted stakeholders in a staged and structured manner. Muster areas have been identified within the affected communities.
	How would potentially impacted stakeholders know that the HTSF emergency is over?	Depending on the severity of an unlikely HTSF failure, the EMT, in conjunction with the government's Disaster Management Committee, is responsible for assessing when an emergency situation has concluded. Once they determine it is safe, the EMT will notify the appropriate stakeholders and provide guidance on safe areas.
Recovery	In the unlikely event of an HTSF failure, what support will Anglo American provide (including support from other agencies) to expedite recovery?	In the unlikely event of an HTSF failure, Anglo American is dedicated to implementing recovery activities in accordance with GISTM Principles 13 and 14, as per the recovery plan. This commitment involves taking immediate action to contain the situation and initiate remediation efforts. Anglo American will collaborate with disaster management agencies at local, regional, and national levels. A Memorandum of Understanding with a South African disaster response and recovery organisation is in place.

4 – HTSF GISTM Conformance Summary

This section presents the GISTM conformance status for HTSF, as of 5 August 2024, based on self-assessment data using the ICMM Conformance Protocols (ICMM, 2021)¹⁰. GISTM is organised around 6 Topic areas, 15 Principles and 77 Requirements. Table 5 sets out the conformance level definitions.

Table 5. Description of conformance levels (modified after ICMM, 2021)

Conformance level	Description of outcome
Meets	<p>Systems and/or practices related to the Requirement have been implemented and there is sufficient evidence to demonstrate that the Requirement is being met.</p> <p><u>'Meets with a plan'</u></p> <p>Requirements may be designated as 'Meets with a plan' provided that the following stipulations have been met:</p> <ul style="list-style-type: none"> The requirements whereby 'Meets with a plan' is assessed needs to be specifically identified (i.e., distinguished from 'Meets'). Confirmation that the work has been substantially progressed and is supported by systems and processes.
Partially meets	Systems and/or practices related to meeting the Requirement have been only partially implemented. Gaps or weaknesses persist that may contribute to an inability to meet the Requirement, or insufficient verifiable evidence has been provided to demonstrate that the activity is aligned to the Requirement.
Does not meet	Systems and/or practices required to support implementation of the Requirement are not in place, or are not being implemented, or cannot be evidenced.
Not applicable (N/A)	The specific Requirement is not applicable to the context of the asset.

Table 6 presents HTSF self-assessed conformance levels by GISTM Principle and Requirements along with a descriptive summary of the conformance status and context. Conformance level data is presented showing requirements that are 'Meets', 'Partially meets', 'Does not meet' or 'N/A', in alignment with the guidance provided within the ICMM Conformance Protocols.

The HTSF self-assessment conformance levels of the 77 Requirements are:

- Meets: 71
- Partially meets: 3
- Does not meet: 0
- Not applicable: 3

This Disclosure Report is prepared in accordance with the Requirements of the GISTM, and with the benefit of guidance issued by the ICMM. It concerns conformance with the GISTM only, and does not address compliance with applicable legal and/or regulatory requirements. Any indication that the facility is not in full conformance with one or more Requirements of the GISTM as at 5 August 2024 should not be understood to mean that the facility is not in compliance with any applicable legal or regulatory requirements that may overlap with the Requirements of the GISTM. AAP seeks to ensure full compliance with applicable legal and regulatory requirements at all times.

¹⁰ ICMM (2021). Conformance Protocols: Global Industry Standard on Tailings Management. <https://www.icmm.com/en-gb/our-principles/tailings/tailings-conformance-protocols>.

Table 6. HTSF GISTM conformance data and discussion

Principles	Conformance level	Requirements ¹¹	Conformance discussion
1 – Human Rights & Engagement	Meets	1.1, 1.3, 1.4	All applicable Requirements within Principle 1 are met.
	Partially meets	-	As no indigenous or tribal communities have been identified within the modelled HTSF impact area, Requirement 1.2 has been assessed as not applicable.
	Does not meet	-	
	N/A	1.2	
2 – Define Knowledge Base	Meets	2.1, 2.2*, 2.3, 2.4*	Requirement 2.1 is met. Work plans are being executed to improve and document the knowledge base regarding detailed site characterisation to better inform all failure modes, control strategies and TSF closure implementation.
	Partially meets	-	In-situ and laboratory testing programmes are in progress. The assessment and documentation of potential human exposure and vulnerability to TSF failure scenarios are being refined to address Requirement 2.4.
	Does not meet	-	
	N/A	-	
3 – Utilise Knowledge Base	Meets	3.1, 3.2, 3.4	All applicable Requirements within Principle 3 are met. Requirement 3.3 is relevant to new TSFs. As the HTSF is not new, this Requirement is assessed to be not applicable.
	Partially meets	-	
	Does not meet	-	
	N/A	3.3	
4 – Planning & Design Basis	Meets	4.1 to 4.6. 4.7*, 4.8	All plans and designs are in progress to reduce risk across the TSF lifecycle phases.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
5 – Design	Meets	5.2, 5.3, 5.5, 5.6	Disclosed elements listed under Principles 2 to 4 need to be completed to improve operational risk and control management strategies. This will be followed by a risk informed decision process to support the appropriate mitigation measures. Requirements 5.4, 5.7, and 5.8 will be addressed once the risk informed process is completed. Requirement 5.1 is relevant to new TSFs and TSFs which shall be expanded beyond current design. As the HTSF is not new nor part of a planned expansion, this Requirement is assessed to be not applicable.
	Partially meets	5.4, 5.7, 5.8	
	Does not meet	-	
	N/A	5.1	
6 – Risk Management Strategies	Meets	6.1 to 6.6	All applicable Requirements within Principle 6 are met.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
7 – Monitoring Systems	Meets	7.1 to 7.5	All applicable Requirements within Principle 7 are met.
	Partially meets	-	
	Does not meet	-	

¹¹ 'Meets with a plan' is indicated with an asterix (*) – Definition as per Table 5, Section 4.

Principles	Conformance level	Requirements ¹¹	Conformance discussion
	N/A	-	
8 – Governance Framework & Systems	Meets	8.1 to 8.7	All applicable Requirements within Principle 8 are met.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
9 – Engineer of Record	Meets	9.1 to 9.5	All applicable Requirements within Principle 9 are met.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
10 – Risk Assessment & Systems Review	Meets	10.1*, 10.2*, 10.3*, 10.4 to 10.7	The risk assessment framework has been updated and execution of the work has been planned. Measures to conform to Requirement 10.2 and 10.3 are underway.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
11 – Promote Learning & Communication	Meets	11.1 to 11.5	All applicable Requirements within Principle 11 are met.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
12 – Whistleblower	Meets	12.1, 12.2	All applicable Requirements within Principle 12 are met. Anglo American has a well-established Whistleblowing policy and associated implementation mechanism entitled “YourVoice” (www.yourvoice.angloamerican.com). YourVoice is our confidential channel that allows employees and contractors to challenge any behaviour that conflicts with our Values and Code of Conduct without fear of retaliation.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
13 – Emergency Management	Meets	13.1, 13.2*, 13.3, 13.4	The capacity assessment has been completed and capacity building plans are currently being agreed.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
14 – Long Term Recovery	Meets	14.1*, 14.2*, 14.3*, 14.4*, 14.5*	A recovery plan is in place and engagements are in progress.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
15 – Disclosure	Meets	15.1 to 15.3	All applicable Requirements within Principle 15 are met. (link: https://www.angloamerican.com/esg-policies-and-data/tailings-summary/our-approach-to-gistm)
	Partially meets	-	
	Does not meet	-	
	N/A	-	

Appendix A – GISTM Report Section Requirement 15.1 Concordance Table

Table A: Guide to GISTM Requirement 15.1 information elements contained in this Report¹²

ID	Description	Section
1	A description of the tailings facility.	1 (Table 1)
2	The Consequence Classification.	1 (Table 1)
3	A summary of risk assessment findings relevant to the tailings facility.	2 (Table 3)
4	A summary of impact assessments and of human exposure and vulnerability to tailings facility credible flow failure scenarios.	1 (Table 1)
5	A description of the design for all phases of the tailings facility lifecycle including the current and final height.	1 (Table 1)
6	A summary of material findings of annual performance reviews and DSR, including implementation of mitigation measures to reduce risk to ALARP.	2 (Table 3)
7	A summary of material findings of the environmental and social monitoring programme including implementation of mitigation measures.	2 (Table 3)
8	A summary version of the tailings facility EPRP for facilities that have a credible failure mode(s) that could lead to a flow failure event that:	3
	i. is informed by credible flow failure scenarios from the tailings facility breach analysis;	
	ii. includes emergency response measures that apply to project affected people as identified through the tailings facility breach analysis and involve cooperation with public sector agencies; and,	
	iii. excludes details of emergency preparedness measures that apply to the Operator's assets, or confidential information.	
9	Dates of most recent and next independent reviews.	1 (Table 1)
10	Annual confirmation that the Operator has adequate financial capacity (including insurance to the extent commercially reasonable) to cover estimated costs of planned closure, early closure, reclamation, and post-closure of the tailings facility and its appurtenant structures.	1 (Table 1)

¹² For a full GISTM glossary of terms, refer to: <https://globaltailingsreview.org/global-industry-standard/>.

Cautionary Statement

Group terminology

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