August 2024

GISTM Disclosure Report: Sishen Dams 1-4 Tailings Storage Facility

This Report summarises information related to the Sishen Dams 1-4 Tailings Storage Facility (Dams 1-4 TSF) owned and operated by the Sishen Iron Ore Company (SIOC), a subsidiary of Kumba Iron Ore Limited (KIO), 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 – Dams 1-4 TSF Description
- 2 – Dams 1-4 TSF Risk Management
- 3 – Dams 1-4 TSF Emergency Management
- 4 – Dams 1-4 GISTM Conformance Summary

This 2024 report is based on the commitments made by Anglo American[2] 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/.

2 References to Anglo American includes Kumba Iron Ore Limited as further set out under the heading Group Terminology on page 13

1 – Dams 1-4 TSF Description

The Dams 1-4 form an active upstream constructed facility located east of the plant within SIOC's South Africa-based Sishen Operation. Figure 1 and Table 1 present the general arrangement and location of Sishen TSF, and the key characteristics, respectively.

Figure 1. Dams 1-4 TSF general arrangement and location

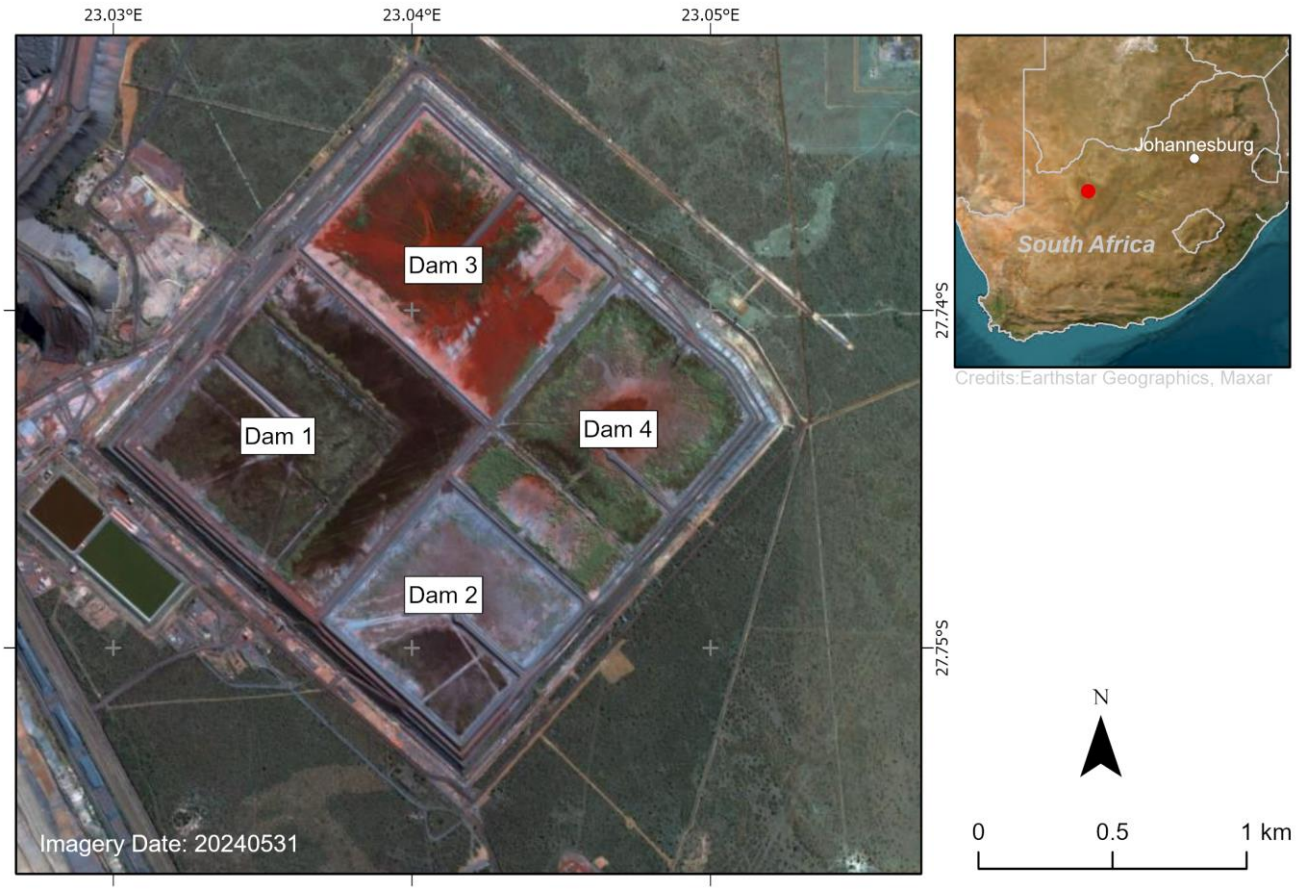

Table 1. Key Dams 1-4 TSF characteristics

Description		Comment
Organisation	Kumba Iron Ore (KIO)	The Dams 1-4 TSF are a component of the Sishen operation, owned by SIOC which is a subsidiary of KIO, the main activity of which is mining iron ore using opencast mining methods.
Facility Location	South Africa (-27.74272, 23.04044)[3]	The Dams 1-4 TSF are located approximately 5 km south-southwest of Kathu in the Northern Cape province of South Africa.
Lifecycle Status	Active	The Dams 1-4 TSF were commissioned in 1974 and are planned to be in operation until 2039.
Consequence Classification	Extreme	This rating was assessed using the GISTM Consequence Classification Matrix.

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

Description		Comment
Construction Method & Summary	Upstream constructed facility[4]	The Dams 1-4 TSF were commissioned in 1974 as four separate dams, referred to as DMS (Dense Media Separation) 1 through 4. Each dam was separated by an open piece of land. The dams were raised independently using coarser (DMS) tailings up to 2019 to an approximate height of 17 m. Deposition occurred on one dam at a time, cycling in 1.5 m layers through the four dams using the upstream construction method through hydraulically placed (i.e., spigotted) tailings. In 2007, the spaces between the DMS 3 and 4 and DMS 2 and 4 were converted to form the JIG (Gravity Separation) Legs 1 and 2, receiving the finer tailings from the newly constructed JIG plant. In 2014, the space between DMS 1 and 3 and DMS 1 and 2 were converted to form the JIG Legs 3 and 4, respectively. The conversion comprised constructing engineered rockfill walls across the gaps between the DMS Dams to provide containment walls for the tailings to be deposited inside the Legs. To raise the JIG Legs to a similar elevation (height of 17m) as the adjacent DMS Dams, the rock embankments were raised twice by both centreline and downstream construction methods using engineered rockfill embankments. Since 2019 the DMS and JIG plant tailings streams have been co-deposited as coarse and fine layers on the Dams and the Legs. In 2019 a transition from a 7-compartment facility into a simplified 4-compartment facility commenced, whereby the JIG Legs were incorporated into an adjacent DMS Dam. This transition was completed in early 2023 at a facility height of approximately 20 m. Since 2020 the deposition methodology has been modified from spray barring (at 1m intervals) to spigotting with chutes (at 6 m intervals) from an engineered rockfill HME (Heavy Mining Equipment) compacted deposition bund. Deposition occurs on one dam at a time with a 1.5 m layer thickness per cycle. This allows one dam to dry out; one dam to be prepared for the next deposition cycle; and one dam to be preserved and available for deposition as a contingency.
Key Appurtenant Structures	Return water dams, penstock-decant system	Dam1-4 have their own drainage system as they operate as independent dams, and then feed into an integrated drainage, decanting and return water dam system.
Height (m): Current / Final	22.5 / 35	The JIG Legs and DMS Dams have reached a common elevation.
Downstream Slope Angle	2H : 1V[5]	Applicable to outer downstream slopes of the DMS Dams.
Tailings Storage Volume	41.8 Mm^3	Total facility volume (i.e., cumulative for all containment structures).
Closure Plan Summary	Closure cover - landform (no pond)	The Dams 1-4 TSF closure plan design configuration includes: • A gently sloping top with centralised drainage covered with a mixture of discard, tailings and topsoil intended to accommodate diverse post-mining land uses. This landscape shall effectively channel runoff through a chute that leads into a spillway located on the side slope; and,

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

5 2H:1V is the slope gradient, i.e. for every 2m of Horizontal distance there is a 1m Vertical rise

Description		Comment
		• 200 m long geomorphic slopes with crests and valleys to form a stable vegetated landform in the long term (i.e., prevent erosion). The closure plan includes post-closure monitoring and maintenance of the facility.
Confirmation of adequate financial capacity to cover estimated closure costs[6]	Confirmed	Financial capacity is assessed for the Anglo American Group as a whole, of which the Dams 1-4 TSF form part. Based on the 2023 Anglo American 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. 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.
Independent Reviews	Most recent and planned	The most recent Dam Safety Review (DSR) was conducted in July 2023, and the next instance is planned for 2028, which is in accordance with the occurrence frequency indicated by GISTM. Independent Technical Review Board (ITRB) reviews are conducted annually, with the most recent review having been conducted in Q4 2023. An independent assessment on groundwater and geochemistry was completed in 2023.

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

2 – Dams 1-4 TSF 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

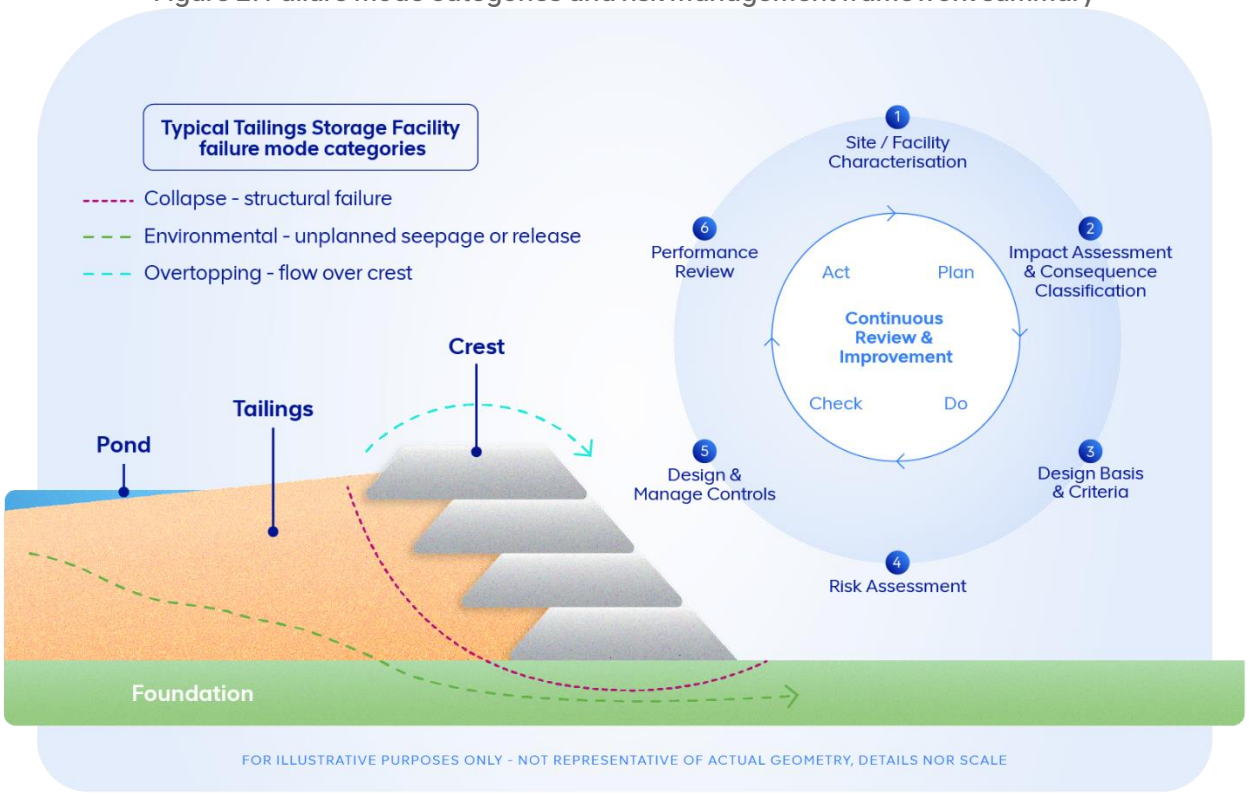

Table 2. Summary of Anglo American TSF risk management system elements

Element	Comment
1. Site / Facility Characterisation	TSF investigation programmes 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	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. 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.

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[7], operational[8] and mitigative (such as emergency management; refer to section 3)[9] 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 programmes.

Table 3. Dams 1-4 TSF performance review and risk findings

Recommendations summary	Status of mitigation measure(s)
Dam safety monitoring	
Further develop the geotechnical knowledge base by undertaking a gap assessment and developing a scope of work to address identified gap(s).	Knowledge Base gaps have been identified during self-assessment and a scope of work has been developed to address the identified gaps. A field characterisation programme is in progress.
The potential for HME (i.e., engineered waste rock) perimeter bund wall, internal stability and suffusion should be assessed.	The Dams 1-4 team is currently undertaking a risk assessment programme and this potential failure mode is included within this review.
Seismic analyses should be completed for the Dams 1-4 TSF.	A seismic hazards review assessment was completed in July 2023. This assessment informs the dynamic deformation analysis which is in progress.
Environmental monitoring	
Integrate the management of groundwater aspects into the Tailings Management System.	An independent assessment which covered geochemistry was completed in 2023. Plans have been developed and are being implemented.
Social monitoring	
Sishen 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.	The social management system has been fully implemented. No grievances were received in relation to tailings management.

7 Design controls typically take the form of required TSF configurations (e.g., embankment slope angle, crest width) and construction material property control.
8 Operational controls generally include standard operation procedures, surveillance (e.g., instrumentation, visual inspection) and ongoing maintenance activities.
9 Mitigative controls typically focus on emergency management preparations and planning that could potentially result in on-site or off-site impacts.

3 – Dams 1-4 TSF Emergency Management

The Dams 1-4 TSF Emergency Management (EM) framework describes how Anglo American 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 Dams 1-4 TSF EM framework, is a critical mitigative control to reduce on-site and off-site consequences in the unlikely event of a Dams 1-4 TSF failure. The Dams 1-4 TSF EM framework is structured around four key elements, namely: 'Prevention & Mitigation', 'Preparedness', 'Response' and 'Recovery'. Table 4 presents a summary of the Dams 1-4 TSF EM framework organised by these elements and the associated key questions which are addressed.

Table 4. Dams 1-4 TSF EM framework summary

Element	Key question(s)[10]	How the framework addresses these questions
Prevention & Mitigation	What are the Dams 1-4 TSF risks and how does Anglo American identify, monitor, reduce and control them?	Section 2 of the EM framework presents the Dams 1-4 TSF risk management system. This system focusses 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. A Dams 1-4 TSF monitoring system is in place which includes, among other things, 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.
Preparedness	What Dams 1-4 TSF emergency preparedness plans are in place?	Dams 1-4 TSF EM Plans and procedures have been developed, incorporating feedback from local authorities and affected communities.
	Who could be potentially impacted in the event of a Dams 1-4 TSF emergency?	Potentially impacted stakeholders have been identified based on the estimated Dam 1-4 TSF inundation area. These potentially impacted stakeholders are being engaged and familiarised with EM programmes, including through emergency response simulation exercises as needed. At current height, any failure of the dam is not expected to impact beyond the mine boundary.
	Who are the Dams 1-4 TSF emergency response participants and what are the established roles, responsibilities and required resources?	The Anglo American response to an emergency follows a three-tiered approach: 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 with the KIO 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 KIO CMT is responsible for: a. Coordinating a large-scale emergency that impacts areas away from the mine site; and,

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

Element	Key question(s)[10]	How the framework addresses these questions
		b. Supporting the site-based emergency response, and communicating and coordinating with potentially impacted people (e.g., communities, neighbouring mine operations) and regulatory authorities. 3. The Anglo American corporate office (London, UK) crisis management team provides support to the KIO CMT.
	How does Anglo American check Dams 1-4 TSF EM Plan implementation and operational readiness?	Anglo American tests and checks Dams 1-4 TSF EM Plan implementation and operational readiness by conducting internal and external emergency exercises, assessing areas for improvement and closing the identified gaps. The emergency exercise programme makes potentially impacted stakeholders aware of notifications and alarms. Evacuation routes are practised. The most recent Dams 1-4 TSF emergency exercise was carried out in the form of an on-site emergency evacuation drill in May 2023.
Response	How will Anglo American respond to a Dams 1-4 TSF emergency, including notifications to potentially impacted stakeholders? What should these stakeholders do?	In the event of an escalating Dams 1-4 TSF 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 points have been identified within the downstream affected areas of the dam.
	How would potentially impacted stakeholders know that the Dams 1-4 TSF emergency is over?	Depending on the severity of an unlikely Dams 1-4 TSF 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 a Dams 1-4 TSF failure, what support will Anglo American provide (including support from other agencies) to expedite recovery?	In the unlikely event of a Dams 1-4 TSF 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 – Dams 1-4 TSF GISTM Conformance Summary

This section presents the GISTM conformance status for Dams 1-4 TSF, as of 5 August 2024, based on self-assessment data using the ICMM Conformance Protocols (ICMM, 2021)[11]. 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	Systems and/or practices related to the Requirement have been implemented and there is sufficient evidence to demonstrate that the Requirement is being met. 'Meets with a plan' Requirements may be designated as 'Meets with a plan' provided that the following stipulations have been met: • 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 Dams 1-4 TSF 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 Dams 1-4 TSF self-assessment conformance levels of the 77 Requirements are:

- Meets: 72
- Partially meets: 2
- 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. SIOC seeks to ensure full compliance with applicable legal and regulatory requirements at all times.

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

Table 6. Dams 1-4 TSF GISTM conformance data and discussion

Principles	Conformance level	Requirements[12]	Conformance discussion
1 – Human Rights & Engagement	Meets	1.1, 1.3, 1.4	All applicable Requirements within Principle 1 are met. No indigenous or tribal communities have been identified within the modelled Dams 1-4 TSF impact area; as such Requirement 1.2 has been assessed to be not applicable.
	Partially meets	-	
	Does not meet	-	
	N/A	1.2	
2 – Define Knowledge Base	Meets	2.1, 2.2*, 2.3, 2.4	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. In-situ and laboratory testing programmes are in progress.
	Partially meets	-	
	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 Dams 1-4 TSF 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 4.4, 4.5*, 4.6, 4.7*, 4.8	All plans and designs, including buttressing, are in progress to reduce risk across the TSF lifecycle phases.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
5 – Design	Meets	5.1 to 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 and 5.7 will be addressed once the risk informed process is completed. Requirement 5.8 on involuntary resettlement is assessed as not applicable as there are no communities at risk of loss of life in the modelled inundation zone.
	Partially meets	5.4, 5.7	
	Does not meet	-	
	N/A	5.8	
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	-	
	N/A	-	

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

Principles	Conformance level	Requirements[12]	Conformance discussion
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 has been completed following the updated risk framework. 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 to 13.4	All applicable Requirements within Principle 13 are met.
	Partially meets	-	
	Does not meet	-	
	N/A	-	
14 – Long Term Recovery	Meets	14.1 to 14.5	All applicable Requirements within Principle 14 are met.
	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 Report[13]

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: 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 though 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.	3
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)

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

Cautionary Statement

Group terminology

In this document, references to "Anglo American", the "Anglo American Group", the "Group", "we", "us", and "our" are to refer to either Anglo American plc and its subsidiaries (including specifically Kumba Iron Ore Limited) 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 those generic terms herein is for convenience only, and is in no way indicative of how the Anglo American Group or any entity within it is structured, managed or controlled. Anglo American subsidiaries (including specifically Kumba Iron Ore Limited), and their management, are responsible for their own day-to-day operations, including but not limited to securing and maintaining all relevant licences 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. Such 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, and for implementation, oversight, and monitoring within their specific businesses.

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