August 2024

# GISTM Disclosure Report: Vaalkop Tailings Storage Facility

This Report summarises information related to the Vaalkop Tailings Storage Facility (TSF), 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 – Vaalkop TSF Description
- 2 – Vaalkop TSF Risk Management
- 3 – Vaalkop TSF Emergency Management
- 4 – Vaalkop TSF 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 –Vaalkop TSF Description

The Vaalkop TSF is an active upstream constructed tailings complex located northeast of the main offices within Anglo American Platinum's South Africa-based Mogalakwena Operation. Figure 1 and Table 1 present the general arrangement and location of Vaalkop TSF, and the key characteristics, respectively.

Figure 1. Vaalkop TSF general arrangement and location

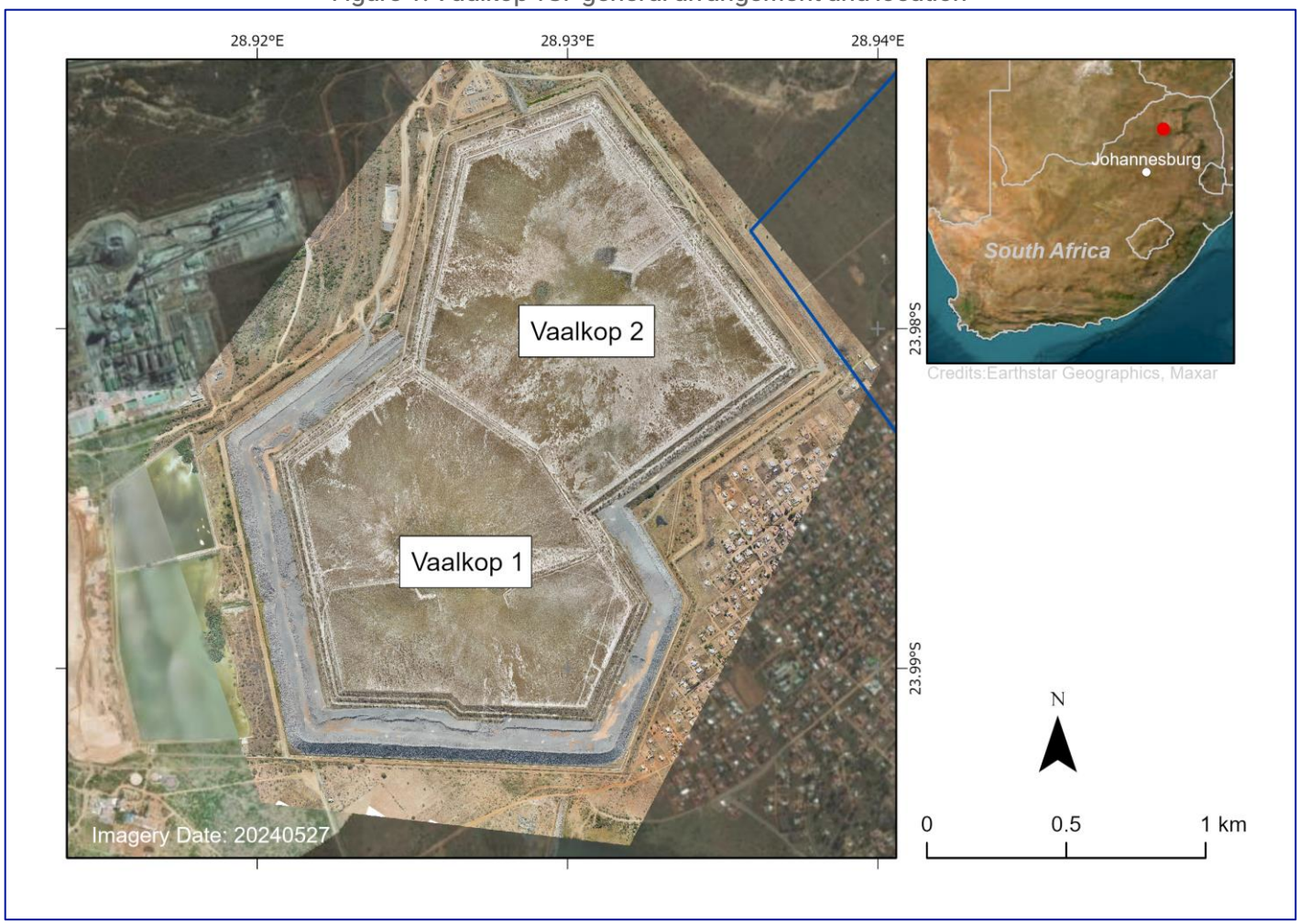


Table 1. Key Vaalkop TSF characteristics

| Description | | Comment |
|---|---|---|
| Organisation | Anglo American Platinum (AAP) | Owned and operated by Rustenburg Platinum Mines, a wholly owned subsidiary of AAP, the Vaalkop TSF is a component of its Mogalakwena Operation, the main activity of which is the mining of Platinum Group Metals (PGMs) using open pit mining methods |
| Facility Location | South Africa (-23.98747, 28.92651)[2] | The Mogalakwena operation is located approximately 30 km to the northwest of Mokopane in the Limpopo Province, South Africa. |
| Lifecycle Status | Inactive | The Vaalkop TSF comprises two contiguous structures: Vaalkop 1 (VK1) and Vaalkop 2 (VK2). VK1 was commissioned in 1992, and VK2 in 2004. Deposition ceased on VK1 in July 2021 and on VK2 in December 2021. (See Closure Plan summary). |

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

| Description | | Comment |
|---|---|---|
| Consequence Classification | Extreme | This rating was assessed using the GISTM Consequence Classification Matrix. |
| Construction Method & Summary | Upstream constructed dam[3] | A toe wall was constructed around the perimeter of the TSFs to demarcate the edge of the depositional area and to provide a starter wall for the placement of the spigot pipes. Tailings deposition commenced from the toe wall, with raises being constructed using the upstream methodology.<br>VK1 was constructed in two phases, with Phase 1 being completed in 1992 and Phase 2 in 1996. Tailings were deposited behind a starter dike, and the TSF was raised using an upstream construction method. Phases 1 and 2 merged, and the VK1 was operated as one continuous TSF.<br>VK2 was commissioned to avoid a larger rate of rise on VK1. Tailings were deposited behind a starter dam, and the TSF was raised using an upstream construction method. In 2007 due delay in commissioning a new TSF, tailings needed to be diverted to VK2, and a rockfill buttress was constructed in two phases in the downstream direction to accommodate the larger rate of rise on VK2. The rockfill buttress was completed, and tailings continued to be raised upstream above the rockfill buttress crest.<br>Based on observations from a 2017 / 2018 VK1 site investigation, the decision was made to construct a waste rock buttress to improve stability. The construction of the waste rock buttress was completed. |
| Key Appurtenant Structures | Return water dams, penstock-decant system | Facility drainage and surface water management is provided by an integrated internal drainage, penstock-decant and return water dam infrastructure system. |
| Height (m):<br>Current / Final | VK1: 49 / 49<br>VK2: 37 /37 | As the facility is inactive, the current / final heights & tailings volumes are equivalent. |
| Downstream Slope Angle | 2.7H : 1V | Design slope for both VK1 and VK2. |
| Tailings Storage Volume | 71.4 $Mm^3$ | Total facility (i.e., VK1 and VK2) volume. |
| Closure Plan Summary | Closure cover - landform (no pond) | The Vaalkop TSF closure plan includes top-soiling and revegetation of the outer slopes and top surface (i.e., beach and previous pond area) to prevent ponding of rainwater. The current and planned waste rock buttresses act to suitably flatten the outer slopes to meet closure requirements. Studies are ongoing to optimise and refine the Vaalkop TSF closure plan. |
| Confirmation of adequate financial capacity to cover estimated closure costs[4] | Confirmed | Financial capacity is assessed for the Anglo American Group as a whole, of which the Vaalkop TSF forms part.<br>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. |

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 |
|---|---|---|
| | | 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 2022, and the next instance is planned for 2027, which is in accordance with the occurrence frequency indicated by GISTM.<br>Independent Technical Review Board (ITRB) reviews are conducted annually, with the last review conducted in April 2023.<br>An independent assessment on groundwater and geochemistry was completed in 2023. |

## 2 – Vaalkop 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

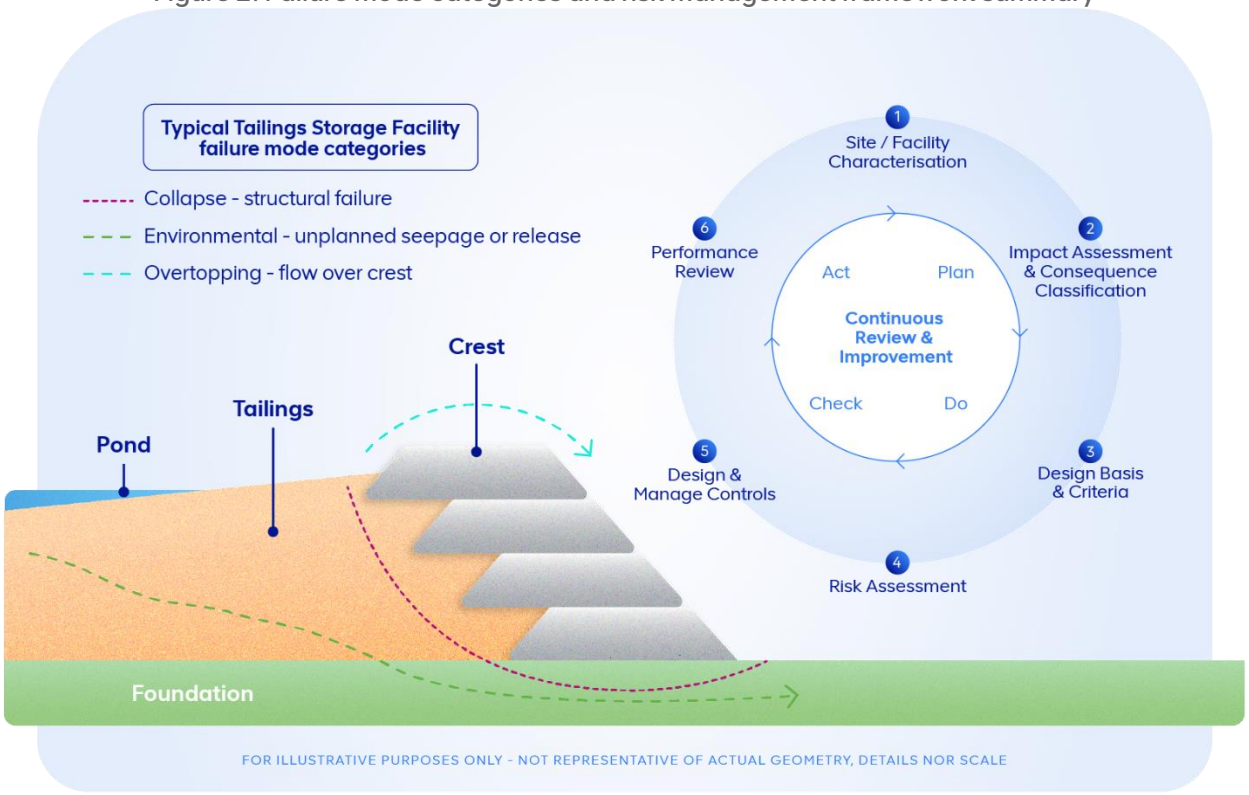


Table 2. Summary of Anglo American TSF risk management system elements

| Element | Comment |
|---|---|
| 1. Site / Facility Characterisation | TSF investigation 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 | 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.<br>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. |
| 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 |

| Element | Comment |
|---|---|
| | 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.<br>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. Vaalkop TSF performance review and risk findings**

| Recommendations summary | Status of mitigation measure(s) |
|---|---|
| **Dam safety monitoring** | |
| Review the exposure to adjacent communities and adapt the emergency preparedness and response plan accordingly. | Plans are in place for emergency preparedness and response, and consultation with the external stakeholders is ongoing. |
| **Environmental monitoring** | |
| Integrate the management of groundwater aspects into the Tailings Management System.<br>Implement measures as required by the 2023 groundwater and geochemistry investigation. | The recommendations arising from the independent assessment of groundwater and geochemistry are being implemented. |
| **Social monitoring** | |
| Mogalakwena 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. | A grievance was received regarding a possible tailings leakage at a Vaalkop pipeline, and a separate grievance regarding compensation for land use was received. Both grievances are being investigated. A grievance regarding possible environmental impacts from the TSF, as well as a separate grievance regarding dust from the TSF were received and have been closed out in accordance with the grievance procedure. |

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.

## 3 – Vaalkop TSF Emergency Management

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

**Table 4. Vaalkop TSF EM framework summary**

| Element | Key question(s)[8] | How the framework addresses these questions |
|---|---|---|
| Prevention & Mitigation | What are the Vaalkop TSF risks, and how does Anglo American identify, monitor, reduce and control them? | Section 2 presents the Vaalkop TSF 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.<br>A Vaalkop TSF 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. |
| Preparedness | What Vaalkop TSF emergency preparedness plans are in place? | Vaalkop 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 Vaalkop TSF emergency? | Potentially impacted stakeholders have been identified based on the estimated Vaalkop TSF inundation area. These potentially impacted stakeholders are being engaged and familiarised with EM programs, including through emergency response simulation exercises as needed. |
| | Who are the Vaalkop 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:<br>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.<br>2. The AAP CMT is responsible for:<br>a. Coordinating a large-scale emergency that impacts areas away from the mine site; and, |

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

| Element | Key question(s)[8] | 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.<br>3. The Anglo American corporate office (London, UK) crisis management team provides support to the AAP CMT. |
| | How does Anglo American check Vaalkop TSF EM Plan implementation and operational readiness? | Anglo American tests and checks the Vaalkop TSF EM Plan implementation and operational readiness by conducting internal and external emergency exercises, assessing areas for improvement, and closing the identified gaps.<br>The emergency exercise program makes potentially impacted stakeholders aware of notifications. Evacuation routes are practised.<br>The most recent Vaalkop TSF emergency exercise was carried out in the form of an emergency evacuation drill in July 2023, and more emergency evacuation drills are planned to take place in additional communities in the near term. |
| Response | How will Anglo American respond to a Vaalkop TSF emergency, including notifications to potentially impacted stakeholders? What should these stakeholders do? | In the event of an escalating Vaalkop 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. Several muster areas have been identified within the affected communities. |
| | How would potentially impacted stakeholders know that the Vaalkop TSF emergency is over? | Depending on the severity of an unlikely Vaalkop 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 Vaalkop TSF failure, what support will Anglo American provide (including support from other agencies) to expedite recovery? | In the unlikely event of a Vaalkop TSF failure, Anglo American is dedicated to implementing recovery activities in accordance with the 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 – Vaalkop TSF GISTM Conformance Summary

This section presents the GISTM conformance status for Vaalkop TSF, as of 5 August 2024, based on self-assessment data using the ICMM Conformance Protocols (ICMM, 2021)[9]. 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.<br>'Meets with a plan'<br>Requirements may be designated as 'Meets with a plan' provided that the following stipulations have been met:<br>• The requirements whereby 'Meets with a plan' is assessed needs to be specifically identified (i.e., distinguished from 'Meets').<br>• 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 Vaalkop TSF self-assessed conformance levels by GISTM Principle / Requirement, 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 Vaalkop TSF 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. Rustenburg Platinum Mines (Pty) Ltd. seeks to ensure full compliance with applicable legal and regulatory requirements at all times.

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

Table 6. Vaalkop TSF GISTM conformance data & discussion

| Principles | Conformance level | Requirements[10] | Conformance discussion |
|---|---|---|---|
| 1 – Human Rights & Engagement | Meets | 1.1, 1.3, 1.4 | All applicable requirements within Principle 1 are met.<br>As no indigenous or tribal communities have been identified within the modelled Vaalkop TSF impact area, Requirement 1.2 has been assessed as not applicable. |
| | Partially meets | - | |
| | Does not meet | - | |
| | N/A | 1.2 | |
| 2 – Define Knowledge Base | Meets | 2.1, 2.2, 2.3, 2.4* | Requirement 2.2 was met.<br>The assessment and documentation of potential human exposure and vulnerability to TSF failure scenarios are being refined. |
| | 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.<br>Requirement 3.3 is relevant to new TSFs. As the Vaalkop 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 4.8 | All applicable Requirements within Principle 4 are met. |
| | 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. 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.<br>Requirements 5.4, 5.7, and 5.8 will be addressed once the risk informed process is completed.<br>Requirement 5.1 is relevant to new TSFs and TSFs which shall be expanded beyond current design. As the Vaalkop TSF 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 | - | |
| | N/A | - | |

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

| Principles | Conformance level | Requirements[10] | 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.<br>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.<br>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. Simulations with potentially impacted communities are planned . |
| | 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 Report**[11]

| 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:<br>i. is informed by credible flow failure scenarios from the tailings facility breach analysis;<br>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,<br>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) |

11 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 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, 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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