AngloAmerican

GROUP HUMAN RIGHTS POLICY

“Our Policies guide us to do the right thing.”

Chief Executive

1. Context

Anglo American has a strong commitment to human rights. Respect for human rights is stated explicitly in our Code of Conduct and is reflected in our core values of safety, care and respect, integrity, and accountability.

Our commitment to human rights is further expressed through our being a signatory to the United Nations Global Compact and the Voluntary Principles on Security and Human Rights (VPSHR), and through being a supporter of the UN Guiding Principles on Business and Human Rights (Guiding Principles). Human rights principles are embedded in a number of our internal Policy documents, including those related to employment practices, exploration, environmental practices, social performance, and security.

We accept and support the corporate responsibility to respect human rights and actively seek to avoid involvement with human rights abuses. We aim to identify, assess, and minimise potential adverse human rights impacts that we may cause or contribute to, or that are linked to our business, through on-going due diligence and appropriate management, as stated in the Guiding Principles.

We also recognise that our host governments have a duty to protect the human rights of everyone within their jurisdiction. Where it is appropriate and within our power to do so, we also seek to promote the observance of human rights in the countries where we work and will work with states to build capacity in support of that objective.

For ease of reading, we use generic language in describing the Group, and this is explained further under “Terms” at the end of this document.

2. Does this apply to me?

This Policy applies to all stages of operational life cycles and to our relationships with our employees, contractors, and other public and private sector business partners in what they do on our behalf. In those situations where Anglo American does not have full management control, we will exercise our available leverage to influence compliance with this Policy.

This is a Group Policy that applies to Anglo American globally, unless any aspect of the Policy is not permitted by local law or regulation. Accountability for implementation of this Policy lies with the Group Chief Executive and with the Chief Executives of the business units.

3. What do I need to know?

Respected rights

Our commitment to respect human rights includes recognition of all internationally recognised human rights, in particular: those contained in the International Bill of Human Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work; and international humanitarian law, where applicable.

Our commitment to the International Labour Organisation's fundamental labour rights entails respect for the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to forced and bonded labour, child labour and unfair discrimination.

As a signatory to the Voluntary Principles on Security and Human Rights (VPSHR), 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 commit to address both adverse human rights risks and impacts and to contribute positively to an enabling environment for human rights to be respected. We are also committed to paying special attention to the rights of potentially vulnerable groups. We recognise that the nature of mining operations, from the earliest stages in the life of our mines, creates the potential for a wide range of human rights risks and we seek to mitigate the risk of any breaches.

As part of our commitment to respect human rights and to a comprehensive approach, we also undertake appropriate due diligence throughout the lifecycle of mining operations.

Where we have caused or contributed to adverse human rights impacts, we contribute to their remediation as appropriate. We will inform and engage appropriately with affected and potentially affected persons on risks, impacts and management measures and keep them involved in monitoring performance. We make particular effort to ensure that we engage with those most vulnerable, in particular where they encounter challenges in voicing their opinions or having them heard, and to identify any additional specific measures to avoid, prevent or mitigate impacts on them.

Civic freedoms and the rule of law are important to the functioning of our business and well-being of our stakeholders. Human rights defenders play a crucial role in protecting civic freedoms and human rights. We recognise our duty to respect human rights defenders and commit to working with partners to promote civic freedoms and the rule of law.

Delivery and implementation

We commit to embed this Policy into our corporate culture and practices. Our efforts are guided by the relevant sections of the Guiding Principles and will include:

- Incorporating ongoing human rights due diligence into relevant business processes as appropriate, such as impact assessments.
- Engaging with relevant, potentially affected stakeholders in assessing and addressing impacts.
- Including human rights-related requirements within contractual arrangements with business partners and host governments as appropriate.
- Collaborating with or providing access to remedy through effective complaints and grievances procedures.

We will continue to play an active and constructive role in relevant human rights related multi-stakeholder initiatives, including the VPSHR, for which the continued implementation is an important pillar of the human rights approach set out in this Policy.

Anglo American will always comply with applicable laws and respect the rule of law. In situations where there is a conflict between domestic legal requirements and international human rights norms, we shall seek to uphold our company values. In doing so we will consider all options; this may include refraining from new, or exiting from existing, investments in the respective jurisdiction.

4. What do I need to do?

It is everyone's responsibility to uphold our commitment to show respect for human rights in every aspect of how we do business.

This means we must demonstrate care and respect in our interactions with each other and with our stakeholders. It also means we must undertake risk-based due diligence of any new activity or business partner where there is a possibility of adverse human rights impacts arising as a result of that activity or relationship, and also on an ongoing basis in our existing activities. It also highlights the importance of having the courage to report any potential or suspected labour or human rights abuse you may observe in our operations or in those of a business partner.

Training and communication

Anglo American communicates this Policy and its requirements to internal and external stakeholders, including general awareness raising and specific training on human rights-related issues, where deemed necessary.

5. Monitoring and reporting

The parties responsible for ensuring, and overseeing, compliance with this Policy are as follows:

- Business Units and Group Functions are responsible for ensuring compliance with this Policy.
- The International, Government and Sustainability Relations, Social Performance and Group Legal teams are responsible for providing complementary expertise, support, monitoring, and challenge relating to compliance with this Policy.
- Internal Audit are responsible for providing independent assurance on the adequacy and effectiveness of the Policy controls in meeting the Policy objectives.

Consequences of breach

People are held accountable for their behaviour when working for or on behalf of Anglo American, and appropriate action is taken where behaviour is inconsistent with the Code of Conduct, group policies and procedures and related documentation. Consequences depend on the circumstances, and could range from a warning to dismissal, as per our Accountability Framework (see Group Accountability Policy) and subject to applicable laws.

6. Further information

Contact

Hermien Botes, Head of Sustainability Engagement
hermien.botes@angloamerican.com

Version

Version 3, approved October 2021

Terms

Term	Explanation
Anglo American", the "Anglo American Group", the "Group", "we", "us", and "our"	In this Policy, and any related procedures or standards, 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 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 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. 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.