

Anglo American plc:
Update report for the

Voluntary principles on security and human rights 2020



Introduction

Anglo American, headquartered in the UK, is one of the world’s largest mining companies. Our portfolio of world-class mining operations and undeveloped resources provides many of the essential metals and minerals that are fundamental to the transition to a low carbon economy, as well as to meeting the growing consumer-driven demands of the world’s developed and maturing economies.

Anglo American is a globally diversified mining company with managed mining operations and projects in southern Africa (South Africa and Zimbabwe), North America (Canada), South America (Brazil, Chile and Peru), Australia and the United Kingdom, as well as non-managed and joint venture operations, exploration, sales and other business activities across Africa, Asia, Europe and the Americas.

We aim to live up to our Purpose and act in accordance with our values, delivering our long term business objectives through three strategic focus areas:

Portfolio

We focus on high quality, long life and diverse mineral assets.

Innovation

We think innovatively about how we ensure the safety of our people, enhance our sustainability performance, and deliver enduring value for all our stakeholders.

People

We create inclusive and diverse working environments that encourage and support a high-performance culture and innovative thinking.

Further details can be found on the Anglo American plc website: www.angloamerican.com.



Summary

Much like other parts of society, our security and human rights context and activities were affected by the Covid-19 pandemic. In response to the pandemic, we developed and rolled-out our comprehensive WeCare Programme which is designed to protect the lives and livelihoods of our more than 95,000 employees and contractors worldwide. The programme is structured in three phases: **Prevent – Respond – Recovery** and includes a host of interventions such as de-densification, use of personal protective equipment, temperature screening, self-monitoring through our Engage app, home-based care services and mental health support.

Many of our operations are based in developing and rural regions. These regions tend to be heavily dependent on the mining sector for employment and regional development. Aware of our responsibility in these regions, we developed and implemented our community response plans in consultation with local stakeholders. The community support initiatives include supporting water availability, provision of adequate sanitation, paying for medical suppliers, supporting healthcare systems, providing logistical support for the movement of medical equipment, distribution of food and other essential items and the provision of support services for mental health and domestic abuse. Our efforts have been designed to help keep communities safe while ensuring that the economic vulnerabilities caused by the pandemic and global lockdowns are mitigated.

From a security and human rights perspective, hard lockdowns significantly reduced protest action in the early parts of 2020. However, growing social and economic insecurity contributed to an increase in protests and criminal activity in some parts of the business in the latter part of the year. Protests were directed toward our operations, with certain community members demanding employment and business opportunities from the business. This was particularly the case at our Platinum Group Metals (PGMs) business in South Africa. In one case, in response to the high-level risks associated with responding to crime incidents, non-lethal firearms were deployed by a security contractor at the operation. During and before such deployment, a full due-diligence process was conducted, and strict operational management conditions were established. The business recorded one potential United Nations Voluntary Principles on Security and Human Rights (VPs) incident during the year, at the Mogalakwena PGMs mine in South Africa. The incident involved the use of force by the South African Police Service to disperse two groups of protesting community members within a public area adjacent to the mining complex. The protests related to demands for employment and business opportunities.

In 2020, despite the complications presented by Covid-19, a total of 7,145 employees, contractors and members of police services participated in our security and human rights training courses.



A Group Security function was formalised in March 2020. In April 2020, security representatives from each of the business units (BUs) and countries of operation were brought together to form a new Group Security Committee. Its purpose is to share intelligence regarding threats to the business, its workforce and equipment, drive excellence and to bring co-ordination and standardisation to physical security throughout Anglo American.

Country	VP Related Incidents	No. of Personnel Trained
Australia	0	0
Angola	0	0
Botswana	0	180
Brazil	0	205
Canada	0	20
Chile	0	19
Ecuador	0	4
Finland	0	0
Namibia	0	233
Peru	0	155
South Africa	1	6,100
United Kingdom	0	0
Zimbabwe	0	229
Total	1	7,145

Figure 1: VPs-related training and incident numbers recorded per country

Policies, procedures and related activities

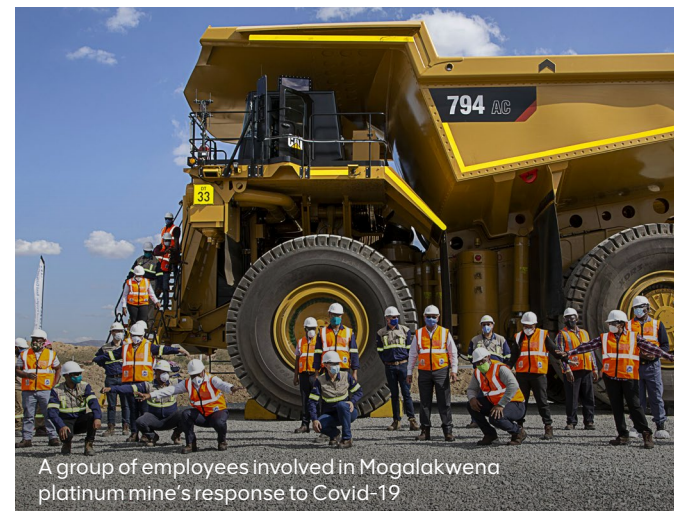
Our Human Rights Policy and due diligence

Our commitment to human rights is led by our policies, starting with Anglo American's Code of Conduct. Our Human Rights Policy offers additional guidance on human rights requirements and is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Voluntary Principles on Security and Human Rights (VPs).

While human rights are embedded throughout our policies, this alone does not meet the human rights due diligence requirements of UNGPs. To resolve this, we carried out a review which included corporate policies and processes that collectively support human rights due diligence. The review covered the salient human rights themes of labour, social impact, security, SHE and supply chain, as well as key business relationships that arise from acquisitions and disposals, joint ventures, and marketing activities. It also included an assessment of the extent to which human rights risks are integrated into the Group Integrated Risk Management Policy and Operational Risk Standard. The review identified some gaps in our human rights due diligence in business relationships. These gaps and others are being addressed.

Social Way 3.0

The Social Way is Anglo American's integrated system for implementing and monitoring our social performance standards. The updated Social Way 3.0 was launched at the beginning of 2020 and, as was the case with its previous versions, again significantly raises the required performance standards. Anglo American operations are in the process of adjusting their social management plans to meet the new requirements, including those related to VPs guidance. The Social Way is available publicly on: <https://socialway.angloamerican.com>



A group of employees involved in Mogalakwena platinum mine's response to Covid-19

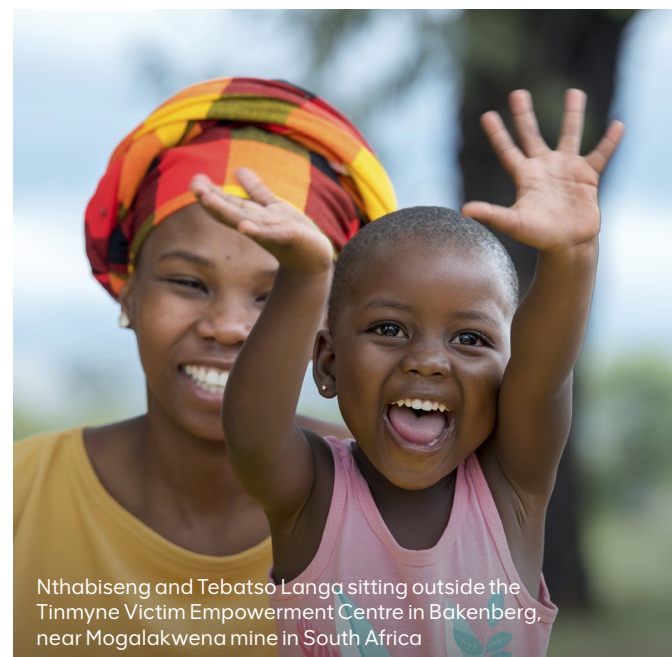
Voluntary Principles on Security and Human Rights

Anglo American is a longstanding signatory to the VPs. Comprehensive guidance and tools for operations on security and human rights are available in Social Way section 4E *Security Management and the Voluntary Principles on Security and Human Rights* and section 4J on *Conflict Management*.

We assess our compliance with the VPs requirements through our annual Social Way audits. In 2020, we conducted a slimmed-down assessment and did not formally assess the VPs requirements in Social Way section 4E. The rationale for not assessing section 4E was that the assessment, even though slimmed-down, is an integrated process that highlights issues pertaining to human rights more broadly and would therefore pick up any issues related to the implementation of the VPs.



Information sharing about the Covid-19 virus and vaccine, as part of the community response in Moquegua, Peru



Nthabiseng and Tebatso Langa sitting outside the Tinmyne Victim Empowerment Centre in Bakenberg, near Mogalakwena mine in South Africa

Responsible sourcing

Our Responsible Sourcing Standard for Suppliers details our expectations of existing or prospective suppliers. The VPs are used as a reference point in the Standard, ensuring that human rights expectations are consistent with security and human rights good practice. Contracts with security providers routinely includes clauses pertaining to compliance with the VPs.

Group Security function

We have established a formal Group Security function to help ensure the security of people, operations and assets through appropriate use of technology, security practice and intelligence, thereby supporting the business to help meet its strategic goals.

The Group Security strategy has been developed and is built on four distinct security pillars:

- Security of people
- Operational security
- Asset protection
- Validation of security risk.

In April 2020, the Group Security Committee was established with representation from all BUs and key internal stakeholders. The committee has brought cohesion, co-ordination and standardisation across our security community, with the focus always being colleague safety, operational security, asset protection, risk identification and intelligence concerning threats. There are three sub-groups of the committee, focused on innovation and technology, protective security, and security standards respectively. The committee meets twice a week to receive a comprehensive security threat intelligence assessment, concentrating principally on our countries of operation. BU representatives contribute to the meetings by providing updates on their respective BU's security threats.



Stuart Chambers, Chairman of Anglo American, and Bryon Grote visiting the Woodsmith Project in the UK

One of Group Security's objectives is for Anglo American to be a leader in security best practice. Its approach is to operate in full accordance with both international standards and the laws of the countries where we operate, and to be technology-enabled, intelligence-led and fully compliant with the VPs.

Security awareness training and educational materials are provided to enable relevant employees to make informed decisions regarding personal security, the security of colleagues and dependants, and the security of Anglo American products and property, as well regarding expectations of the company in relation to the implementation of and compliance with the VPs.

Group Security is committed to adhering to the highest international standards with regard to respect for human rights in the application of the security measures at our sites and projects.

The VPs govern the actions of all security employees and contractors and, in particular, private security service providers tasked with security responsibilities at our sites. We communicate our expectations regarding human rights to such service providers deployed in relation to our operations.

All security-related human rights risks and impacts are managed in compliance with the VPs.

All private security providers are procured following the Group Contractor Performance Management Standard, with the relevant VPs clauses included in the terms and conditions of their contractual agreements. All site security plans must include provision for appropriate investigation of any incidents and/or allegations of human rights infringements by our security employees, and access to remedy in the event of any human-rights-related concern being raised in the context of our security arrangements.



Employees at the Mototolo tailings storage facility in South Africa

Country implementation

Anglo American's BUs manage more than 30 mining operations and 10 processing operations in Australia, Brazil, Canada, Chile, Peru, South Africa, the United Kingdom and Zimbabwe. Anglo American has non-managed and joint venture operations in Botswana, Namibia and elsewhere. Exploration activities are conducted in Angola, Australia, Brazil, Canada, Chile, Colombia, Ecuador, Finland, Greenland, Peru, South Africa, and Zambia. Corporate representative, sales and marketing offices are located in China, India and Singapore.

Australia

In Australia, Anglo American's Metallurgical Coal business includes five mines in Queensland's Bowen Basin, producing high quality hard coking coal for steel production. The company operates in a highly regulated environment, where federal and state governments have enacted several laws that enforce strict adherence to the country's international human rights and security obligations.

In 2019, the business unit conducted a baseline VPs risk assessment in accordance with the Social Way 3.0. Several low-level VPs-relevant risks and impacts were identified, with effective controls in place. These are monitored through the operation's internal systems and are reported on quarterly to the Metallurgical Coal Leadership Team. Training in VPs was planned across all operations in 2020, but rescheduled owing to the Covid-19 pandemic.

No security and human rights incidents or grievances were reported in 2020.

Exploration in Australia

Activities in Australia involve drilling, geophysical survey, geological mapping and sampling in the Mt Isa South and Diamantina regions of north west Queensland. Our engagement with traditional owners and the local community is aligned with Anglo American's Human Rights Policy. No incidents, complaints or grievances related to security and human rights were reported in 2020.

Angola

Anglo American's interests in Angola relate to early stage exploration. All exploration work in Angola is currently suspended. Omega Risk Solutions has been contracted to provide protection services to our office in Luanda and the Lucapa exploration site (currently placed under care and maintenance).

All Omega security officials are checked for any involvement in human rights abuses prior to deployment and, as a condition of contract, are required to be trained on how to prevent human rights abuses. No security and human rights incidents or grievances were reported in 2020.

Botswana

Anglo American's interests in Botswana are linked to its indirect shareholding in Debswana, a 50% joint venture partnership between De Beers and the Government of the Republic of Botswana. Debswana only employs in-house security personnel for high-risk-product protection at its mining operations located at Orapa, Letlhakane, Damtshaa, which has been placed under care and maintenance, and Jwaneng.

The Debswana operations normally raise awareness of the VPs during their local community outreach programmes such as the Community Day engagement sessions at Orapa mine and the interactions with the community by the multi-disciplinary Diamond Awareness Team at Jwaneng mine. The interventions planned for 2020 were ultimately cancelled owing to the risks associated with the Covid-19 pandemic.

Annual training is provided for all security personnel internally and via the De Beers Group Security e-Learning platform. A further 180 candidates successfully completed Anglo American's VPs training in 2020. Of these, 80 were permanent in-house security staff members and 100 privately contracted security personnel. No security and human rights incidents or grievances were reported in 2020.

Brazil

Anglo American has two businesses in Brazil: Iron Ore (Minas-Rio) and Nickel.

In 2019, an external consultant conducted a VPs risk assessment on our Minas-Rio and Nickel operations, including the business' relationship with and reliance on public security forces for security provision. The risk assessment's recommendations were to be implemented in 2020, but implementation has been delayed owing to the pandemic. The recommendations have since been included in the Social Way 3.0 transition plan.

Security providers are trained annual on the VPs, with 185 personnel trained virtually in 2020. No grievance or incident related to security and human rights was received in 2020. Several incidents related to domestic violence in the community have resulted in the establishment of a multi-disciplinary working group on the issue. A baseline study will be conducted in 2021 to understand root causes and as the basis for intervention by the company and other relevant stakeholders.



A group of children at the Renaissance Secondary School in Musina, South Africa. De Beers supported the GirlEng programme at Musina and Renaissance Schools in 2020 as part of a three-year partnership with WomEng

Exploration in Brazil

In 2020, exploration activities in Brazil included greenfield projects in the states of Mato Grosso and Pará. Security risks, as well as broader business integrity and Code of Conduct risks, were assessed within the country workplace risk assessment, which included activities in the projects and in the exploration office. In total, 20 team members completed online Code of Conduct refresher training, which includes aspects of the VPs.

Engagement with stakeholders focused on land access, mapping expectations and needs, and communicating relevant information about our exploration activities. This involved meetings with a wide range of stakeholders, including local police, trade unions, co-operatives, landowners and others. Given the change in Brazilian legislation in 2019 regarding the Extended Weapons Possession decree, which loosens firearm regulations in the country, the field teams received additional training to raise awareness about security issues when engaging with landowners and farmers.

No grievance or incident related to security and human rights was received in 2020.

Chile

Anglo American manages two copper mines in Chile, Los Bronces and El Soldado, and one copper smelter, Chagres.

From October 2019 to April 2020, protests erupted across the country, which were eventually interrupted by the spread of Covid-19. In December 2020, a contractor, Casa de la Paz, began an external-context evaluation for our three managed operations in Chile. The evaluation, with the support of community input, is in the process of identifying real, potential and perceived risks to our business, people and operations.

The final evaluation is scheduled to be completed in April 2021 and will inform the sites' Social and Human Rights Impact and Risk Analysis as part of the requirements of the Social Way 3.0. Owing to Covid-19, there has been a delay in the implementation of the Social Way 3.0 and VPs-related requirements. These actions are scheduled to be implemented throughout 2021, with training planned for the first half of 2021. The Security Management Plan will also be updated according to the new Social Way during 2021.

Currently, only private security contractors are deployed at our operations in Chile. During 2020, all personnel deployed were trained on the VPs. There were no VPs-related incidents in 2020.

Ecuador

Exploration activities in Ecuador in 2020 were focused on technical and social programmes in the Pegasus District. Covid-19 resulted in the suspension of field activities in March 2020. Despite this delay, a tender process was carried out in the first quarter of 2020 to appoint a contractor to provide security services for a fixed camp.

Detailed human rights due diligence was done on each of the candidate contractors. Following the appointment of the contractor, four staff belonging to the security contractor, senior members of the local police force and members of the social team received VPs training. New security procedures and an update of the social strategy have been completed, based on Social Way 3.0 requirements.

There were no VP-related incidents and grievances received in 2020.

Finland

Anglo American owns and manages the Sakatti project in Finland. Sakatti is a multi-metal deposit in the north of the country near the town of Sodankylä. The project conducts regular risk assessments even though it operates in a low-risk environment. No VPs training took place in 2020 and no VPs-related incidents or grievances were reported in the year.

Namibia

Namdeb, De Beers Marine Namibia and the Namibian Diamond Trading Company are wholly owned subsidiaries of Namdeb Holdings (Proprietary) Limited, which is owned in equal shares by the Government of the Republic of Namibia and De Beers.

There are no public security forces deployed at the Namibian operations, although they are used to escort product.

Formal human rights and VPs training is provided for all security officials and cross-functional stakeholders (i.e. Community Relations, Social Performance, HR, Corporate Communications, etc. and Police/Public Service Support) internally and via the De Beers Group Security e-Learning platform.

In 2020, a further 233 candidates completed Anglo American's VPs training course. This included 173 in-house security staff members, 58 privately contracted security personnel and two cross-functional stakeholders.

No VPs-related incidents or grievances were reported in 2020.

North America

In North America, De Beers manages three diamond mines in Canada: Gahcho Kué, Snap Lake and Victor. Snap Lake mine is currently placed under care and maintenance and Victor mine is now in the closure phase, with closure expected to be completed in 2024. Gahcho Kué is a joint venture between De Beers (51%) and Mountain Province Diamonds Inc. (49%) and is currently the only operating De Beers mine in Canada.

De Beers Canada is in the process of updating its External Incident and Grievance Management procedure to align with the updated requirements of Social Way 3.0. The procedure will incorporate the investigation of grievances through the Learning from Incidents' process, which will form the basis for resolving grievances and remediation of harm.

In 2020, 19 protective services staff members and one fixed term security contractor completed Anglo American's VPs training. No security and human rights incidents or grievances were reported in 2020.

Exploration in North America

In 2020, exploration activities in North America were limited to desktop regional exploration within Canada, Greenland and the United States. Security and human rights risks in North America are low and no internal or external security forces were engaged during 2020. Nevertheless, compliance with the VPs is stipulated in all contracts for services and a policy document on human is appended to all contracts to ensure adherence. No grievance or incident related to the VPs was received in 2020.

Peru

Anglo American is the majority shareholder of, and manages, the Quellaveco copper project in Peru. In 2020, Anglo American conducted human rights due diligence in Peru, via the Vincular Center of the Pontifical Catholic University of Valparaíso and based on the OECD standards and the UNGPs.

The Security team in Peru has been working on a Security Management Plan for Quellaveco. In addition, the Government Affairs Action Plan for 2020 included a strategy to implement the VPs in Quellaveco, including plans to engage national stakeholders on the VPs.

All private security providers are expected to execute an annual training plan, which includes elements on the VPs and human rights. In 2020, 155 people received VPs-related training. No VP-related incidents and grievances were received in 2020.

Exploration in Peru

Activities in Peru involved regional prospecting and technical visits in the north and south of Peru. Security and human rights scenarios were considered in both the Peru country baseline and project risk assessments.

The exploration team in Peru does not engage security forces. No grievances or incidents related to the VPs were received in 2020.

South Africa

Anglo American has several operations in South Africa that are managed by its PGMs, De Beers, Kumba Iron Ore and Coal businesses.



Employees practicing social distancing as part of the Sakatti project in Finland's Covid-19 mitigation measures

Our PGMs business

Our PGMs business faced a number of challenges in 2020, in large part owing to Covid-19. National lockdowns resulted in a significant decrease in the number of social protests in the first half of 2020 compared with the corresponding period in 2019. The easing of lockdowns in the second half of the year saw almost daily public protests near PGMs' operations. These protests were driven by demands for employment and business opportunities from local communities and often took the form of small-scale group actions within public spaces or on access routes to the operations.

In 2020, we also saw a rise in criminal activity against the company in the form of intimidation against employees, gunfire directed towards trucks carrying product, and several arson attacks at one of our operations. Increasing vulnerability and heightened expectations around host communities remain the main contributing factors to increasing security risk. Collaboration with state security agencies, municipal public safety personnel, traffic agencies and road management companies served to ensure that the Protection Services (PS) team received early warning about social unrest or protest actions in public areas outside of the immediate vicinity of our operations. This early-warning system allowed PS to respond in a manner that avoided potential conflict.

The high-risk environment at one PGMs operation necessitated the deployment of non-lethal firearms by a security contractor. During and before such deployment, a full due-diligence process was conducted, and strict operational management conditions were established. All armed contract security personnel underwent initial VPs training, as well as training in PGMs' Use of Force Procedure and Rules of Engagement.

In 2020, 1,279 personnel received VPs training. PGMs recorded one potential VPs incident at Mogalakwena mine, during which the South African Police Service, Public Order Police, used force (rubber bullets and flash bangs) to disperse two groups of protesting community members who were disrupting traffic and preventing employees from accessing the mining complex adjacent to the South Concentrator and North Mining entrances. The community members were protesting about job and supplier opportunities at the operation. One of the affected community members opened a criminal case against the Public Order Police which remains under investigation by the Independent Police Investigation Department (IPID). PGMs' Protective Services continues to monitor the progress of the investigation. Following the incident, Protective Services conducted a full evaluation of the incident and interviewed all security personnel deployed near the incident. CCTV footage was reviewed and corroborated the statements of security personnel deployed on the day of the incident.

De Beers South Africa

De Beers' operations in South Africa include Venetia mine, Voorspoed mine, De Beers Marine, De Beers Sightholder Sales South Africa, and Element 6.

In 2020, a further 246 candidates successfully completed the standardised Anglo American's VPs training course. This included 68 in-house security staff members, 156 privately

contracted security personnel, 19 cross-functional stakeholders and three South African police officers.

Around De Beers operations in South Africa, illegal mining, labour, and community unrest remain the security challenges with the highest potential for human rights and VPs-related impacts.

Even though there were several criminal incidents linked to illegal mining at Namaqualand Mines (currently in closure phase) that required interventions from the local law enforcement agencies, no VPs-related incidents were reported.

Kumba Iron Ore

Our Kumba Iron Ore business operates two mines in South Africa: Sishen and Kolomela.

A total of 4,371 employees are registered for the e-learning course and most of them completed the full or refresher course during 2020.

In addition to the e-learning, three on-site classroom training sessions were held during 2020 to train 312 security officers and members of the Siyatamba Community Forum who do not have access to e-learning facilities (along with some members of the local police). The number of classroom training interventions were low due to the Covid-19 pandemic.

Agreements and memorandums of understanding are in place with public service providers with specific reference to the VPs. No VPs-related incidents or grievances were received in 2020.

Coal South Africa

Our Coal business in South Africa comprises six collieries, namely Khwezela, Zibulo, Isibonelo, Goedehoop, Greenside and Mafube.

In 2020, the business embarked on a tender process to appoint the services of a new private security company. Social performance considerations, including knowledge and understanding of the VPs, were included in the decision-making process. All private security companies contracted by Coal are required to comply with Anglo American's Human Rights Policy, the VPs, as well as the Standard for Suppliers.

Starting in 2019 and continuing into 2020, Coal has entered into memorandums of understanding with more than six local police stations around our operations to ensure public security staff respect and uphold human rights in the execution of their duties.

Owing to Covid-19 disruptions, refresher VPs training was only provided to protection services employees. In total, 138 personnel were trained in 2020. The Coal business registered a total of 45 community protests at its operations, but none resulted in security and human rights incidents or grievances.

United Kingdom

In March 2020, Anglo American acquired Sirius Minerals Plc which has been developing a major new polyhalite project in the north east of the UK. When completed, the operation will produce polyhalite, a naturally occurring multi-nutrient fertiliser that is suitable for organic use, has a low carbon footprint, and that increases crop yields and aids more sustainable farming and food production.

The area of operation is a low-risk environment, where extensive community and local stakeholder engagement has taken place. Triton Group provides security services to the site. All security personnel are required to be suitably qualified and licensed. Furthermore, our recruitment and induction processes ensure that all security staff are competent, and that they understand and follow site protocols. The police are notified in circumstances where a situation has the potential to escalate and they can be relied upon to respond quickly.

The workforce at the project still needs to undertake VPs-related training. Since the acquisition, no VP-related incidents and grievances were recorded in 2020.

Zimbabwe

Our PGMs business operates Unki mine in Zimbabwe.

The Unki mine has a memorandum of understanding with the Zimbabwean Republic Police. This provides for joint policing activities by internal protection services and the Zimbabwe Republic Police at the mine. This has presented an opportunity to train the police on security and human rights. Owing to the pandemic, limited engagement opportunities arose with the Zimbabwean Republic Police and no formal meetings took place.

In 2020, the Unki VPs risk assessment was reviewed. The VPs were also incorporated into several procedures, including, but not limited to, the 'search' and 'effecting an arrest' procedures.

In 2020, 229 personnel received VPs-related training. No VPs incidents and grievances were recorded in 2020.



A general view of the Mototolo concentrator in South Africa

Lessons and issues

In 2020, our focus was on responding to the challenges brought by Covid-19. While our WeCare programme offers a set of interventions globally to help protect the lives and livelihoods of employees and communities during this time, security challenges, in southern Africa in particular, have highlighted the risk of increased vulnerability in certain communities. This heightened vulnerability increases the risk of protests being held, as well as a rise in gender-based violence and violent crimes towards our operations and our colleagues in certain areas. We have begun working on long-term and holistic socio-economic development interventions with our partners that will help build resilience in our host communities and support our Sustainable Mining Plan goals of building *thriving communities*.

Future plans

In 2020, we finished conducting a robust human rights due diligence process (including security and human rights risks). The focus in 2021 is to engage with internal stakeholders across the business on the recommendations coming out of the process and further standardise core aspects of VPs implementation, including reporting, commercial contracts with private security providers and training.



Athalia Mogamotho, a truck operator at Mogalakwena platinum mine in South Africa

References to Anglo American

In this statement, references to “Anglo American”, the “Anglo American Group”, the “Group”, “we”, “us”, and “our” are used 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 or person. The use of those generic terms in this statement 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. The Anglo American Group comprises separate legal entities. “Subsidiaries” are entities over which the Anglo American Group directly or indirectly is able to exercise control, and entities over which the Anglo American Group has joint control are referred to as “joint ventures”. “Managed joint ventures” are entities where a member of the Anglo American Group has management control or an ability to direct day-to-day activities. This statement covers Anglo American plc, its subsidiaries and its managed joint ventures; it does not include independently managed operations or cover non-managed joint ventures. 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, training, oversight and monitoring within their specific businesses, including any applicable local-grievance mechanisms.

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