

**Company Name** Anglo American  
**Industry** Extractives  
**UNGP Core Score (\*)** 20.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
1	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>20.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The Codes states that 'we have a fundamental commitment to respecting labour and human rights'. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: The Company is a signatory of the United Nations Global Compact. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: The Company is a 'supporter of the UN Guiding Principles on Business and Human Rights'. [Human Rights Policy version 2, 2018: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: Commitments are contained in the Human rights policy and in the code of conduct. The code states that 'we are committed to the International Labour Organisation's core labour rights, covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to forced labour, child labour and unfair discrimination'. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: The Company 'also expect our contractors, suppliers and agents, along with their employees, to work and act in a way that is consistent with our Code [of Conduct].' It is stated that 'We are committed to the International Labour Organisation's core labour rights, covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to forced labour, child labour and unfair discrimination'. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: Commitments are contained in the Human rights policy and in the code of conduct. The code states that 'we are committed to the International Labour Organisation's core labour rights, covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to forced labour, child labour and unfair discrimination'. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Code states that 'we take personal responsibility to maintain a safe and secure place of work - our operations should have fundamentally safe, well-designed and well-maintained plants, equipment and infrastructure, with effective safety management systems'. 'We ensure that all our staff are appropriately trained to manage their own safety, the safety of their colleagues, and that safety standards are consistently applied across our operations'. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: Following the statement on health and safety above, the code states that 'we expect our consultants, agents, contractors and suppliers to follow our policies and requirements on safety'. [Code of Conduct v.4, 05/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company's social way policy states that 'Sites shall engage in inclusive, meaningful and participative discussions and consultations with affected stakeholders on an ongoing basis. Sites shall develop and implement a Stakeholder Engagement Plan and update it at least annually. Sites shall establish and maintain a Community Engagement Forum,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>which is a commitment in our Sustainable Mining Plan'. [Social Way v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to engage stakeholders in design: The Social way policy, meaningfully and respectfully engage with all of our stakeholders in accordance with the International Finance Corporation (IFC) Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts'. Each site's Social Management Plan 'shall be based on relevant baseline data, and understanding of affected stakeholders and their feedback'. The site's Socio-Economic Development Plan 'shall involve, and be validated by, relevant stakeholders and be reviewed and adjusted during implementation'. The Human rights policy also indicates that its efforts will include 'engaging with relevant, potentially affected stakeholders in assessing and addressing impacts'. [Social Way v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a> &amp; Human Rights Policy version 2, 2018: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Human rights policy indicates that 'Where we have caused or contributed to adverse human rights impacts we will contribute to their remediation as appropriate'. In the Social way it states that 'we apply the mitigation hierarchy approach by first assessing, seeking to avoid, minimising, mitigating and then remediating potential negative impacts and risks arising from our sites' activities'. [Human Rights Policy version 2, 2018: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Social Way v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies: The Company states in its Social Way website that 'Site procedures should make it explicit that site-level mechanisms are not the only means of accessing remedy: affected stakeholders should be provided with information on alternative mechanisms; state and non-state based'. However, no explicit commitment to not obstruct access to other remedies was found. Current evidence refers to provide information on alternative mechanism, not that it will not obstruct access to them. [The Social Way: 3B Incident and Grievance Management: Task 1, N/A: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is commitment to each ILO core area.</li> <li>• Met: Senior responsibility for HR: The Sustainability report indicates that the Board delegates executive responsibilities to the chief executive and the Group Management Committee; 'social performance, human rights and the implementation of our Sustainable Mining Plan fall within the ambit of Anik Michaud, Group director – corporate relations.' 'Tony O'Neill, technical director, has accountability for matters relating to safety, health, environment, supply chain and operational risk'. Tony O'Neill is member of the Sustainability Committee and Anik Michaud also participates in this Committee Meetings. [Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Social Way policy states that 'BU [Business Unit] and site management are responsible for the day-to-day implementation of the Policy and shall ensure that the site and BU teams have clearly-defined roles and responsibilities, adequate financial resources and management systems, and an appropriately staffed and qualified Social Performance team and other functions with accountability for the effective implementation of the Social Way Policy Site and BU Social Performance managers are responsible for, and required to provide, reporting throughout the year to demonstrate implementation of management of Social Performance across their business. Group Social performance is responsible for strategic coordination of reporting, aggregating and reporting the results of the assurance reviews to the Anglo American plc Board on an annual basis'. [Social Way v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility for EX BRs: The Company discloses the following: 'Tony O'Neill, technical director, has accountability for matters relating to safety, health, environment, supply chain and operational risk. Social performance, human rights and the implementation of our Sustainable Mining Plan fall within the ambit of Anik Michaud, Group director – corporate relations.' However, it is not clear how responsibility and day-to-day responsibility to manage human rights issues with extractive business partners is allocated (beyond senior person responsible, this indicator looks for specific teams handling day-to-day operations. [Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: In its Sustainability Report, the Company indicates 'every site must meet the following requirements: Identify, assess and manage social risks and impacts throughout the life of the mine, according to the International Finance Corporation (IFC) Performance Standards'. 'Every Anglo American operation carries out an annual social risk assessment to identify human rights risks and potentially vulnerable groups. Over the past two years, we have conducted human rights due diligence at all our sites'. Tool 1A of the SEAT includes guidance on identifying any potential human rights impacts. The tool indicates that 'this analysis of operational human rights impacts is supplemented with stakeholder engagement'. This tool is used to profile each operation site. [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Identifying risks in EX business partners: Regarding business relationships, the Social way states that 'sites shall comply with the Group Contractor Performance Management Standard and avoid and minimise material adverse social impacts'. Guidance is provided on risk assessment, tender and contractual requirements, and responsibility over their subcontractors, during the pre-contract phase. SEAT includes a specific section about managing contactors and partners, inducing the identification of potential social impacts'. [Social Way v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a> &amp; SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: See above. [Social Way v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a> &amp; SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: In consultation with stakeholders: The tool indicates that 'this analysis of operational human rights impacts is supplemented with stakeholder engagement'. This tool is used to profile each operation site. [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: In consultation with HR experts: In addition, the Sustainability report indicates that in human rights due-diligence exercises, it has counted with 'the help of external experts at 33 operations, including 18 in 2017'. No more recent evidence found. As indicated above, the Company carried out due diligence at all its sites in the last two years. The Company's social way document describe the use of experts in different processes. [Sustainability report 2017, 2018: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not met: Triggered by new circumstances: The Company discloses that 'in 2018 we established a responsible sourcing heatmap which integrates numerous factors, including categories of supply with heightened responsible sourcing risk potential (such as human rights violations), country of origin, the degree of regulation within certain industries, and the extent to which the goods or services are reliant on manual labour. The risk heatmap enables us to classify all our suppliers into one of five responsible sourcing risk groupings, with our primary focus being on high and medium-high risk suppliers.' However, no evidence of new circumstances triggering systems to identify human rights risks could be found. [Modern Slavery Act Statement 2019, 2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Explains use of HRIAs or ESIA (inc HR): See above [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): After identifying issues and impacts, and stakeholder engagement the SEAT includes a tool (3A) to assess these. The process is described in detail and explicitly indicates that any human rights issues or impacts should be assessed. It includes examples of causes of the issues and impacts, such as demographic changes, economic and development change, change in health status, social nuisance factors, etc. [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Public disclosure of salient risks: The Sustainability report includes a chart with salient issues, including risk of sub-standard working condition, risk of forced labour in supply chain, risk of negative long term impact on livelihoods, etc. The report also indicates that each site has identified its key human rights issues in terms of risk for people or the operation, and has developed action plans to address these. 'Common issues identified across all sites included perceptions of discrimination associated with employment and the visibility of procurement opportunities, unfulfilled commitments, and disrespect among contractors for labour rights'. In addition, health and safety is considered to be a main risk for the Company (included in the Enterprise risk management), and it also indicates that no operation is considered at risk regarding freedom of association and collective bargaining, child labour, nor forced labour. [Sustainability report 2017, 2018: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: After assessing the human rights risks, issues and impacts, and developing the stakeholder engagement plan, SEAT includes a tool that allows all operations to outline the management plans to address these issues and impacts identified. The tool provides guidance on how to take action to manage them. [Social Way: <a href="http://australia.angloamerican.com">australia.angloamerican.com</a>]</li> <li>• Met: Including amongst EX BPs: Regarding business partners, the SEAT contains a tool specifically to 'manage the socio-economic impacts associated with contractors. It provides guidance on integrating social performance into the contracting process for contractors at or near Anglo American operations'. The processes included in the tool include identify any social impacts associated with the contracted activities, identify contractor capacity constraints for addressing social issues and agree on a way forward, and develop a social performance management plan with the contractor based on the same tool as referred in this indicator for the Company's activities. [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Example of Actions decided: The Company indicates that 'we have identified gender-based discrimination and violence as a priority area for our efforts to protect human rights. We are taking a holistic approach, which combines workplace interventions with community programmes and wider advocacy'. 'We are conducting baseline studies to evaluate our approaches to protecting women at our sites. So far, we have completed a baseline study at the PGMs' Amandelbult mine in South Africa, and launched a second study at the Goedehoop thermal coal site. Every Anglo American site will develop gender-based violence prevention plans, to address the issues identified in the baseline studies. We have worked with Business Fights Poverty and other private-sector partners on a toolkit for preventing gender-based violence at work, which draws on our experience and insights from these early baseline studies'. [Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: System to check if Actions are effective: The SEAT tool that provides guidance on how to develop social monitoring plans to address human rights impacts and issues (6A), also contains guidance on how to monitor and evaluate the plan: 'The management actions and monitoring measures should include: key stakeholders (internal and external), timelines (implementation and completion), key performance indicators, performance targets and monitoring and evaluation measures'. The tool describes in detail all these aspects. [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness: The Company assesses its 'compliance with the VPs' requirements through our annual Social Way audits. In 2019, we identified the need to improve public security due diligence at most operations. As a consequence, we contracted a service provider to conduct regional due diligence on public security. In 2019, we trained 6,710 employees and contractors on security and human rights'. However, this refers to a plan implemented to remedy an identified issue. Outcome of action plan and lessons learnt still not found. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met: See above</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process.</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Not met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> <li>• Not met: Including EX business partners: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Responding to affected stakeholders concerns: The SEAT also contains a tool (7B) describing how the Company has to share the SEAT process with stakeholders. Feedback to stakeholders has to be included after impacts and issues have been identified and assessed, once the management and monitoring plans have been developed, and after the draft report on the complete process has been completed. Information provided to stakeholders should include, among other things, a description of the material issues and impacts that were identified during the engagement process; identification of the priority issues or impacts that have been identified and how these priority issues were arrived'. The Company reports in relation to incidents and grievances and how are dealing with them: 'At our PGMs' sites, grievances relating to land and resettlement were raised at Twickenham and Mogalakwena, where we are managing several legacy issues around resettlements, as well as an ongoing resettlement. During the 2019 Social Way assessment, both sites demonstrated challenges in engaging with stakeholder on remedial plans and monitoring and evaluation in a post-resettlement environment. This remains a key focus area'. [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Ensuring affected stakeholders can access communications: All stakeholders involved should at least receive a copy of the report and more important stakeholders also should receive a personal briefing. The operation should take steps to ensure that all local stakeholders at least have the ability to access free copies of the report in electronic and hard copy format. The tools provide guidance on issues that the person in charge needs to think to be able to provide the feedback (timing, preferred mode of engagement by stakeholder group, etc). [SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Whistleblowing policy describes the YourVoice programme: 'The YourVoice programme is available to all employees (including contractors), customers, suppliers and other stakeholders of Anglo American.' The scope of this programme includes breaches of the Code of Conduct, which includes human rights issues. [Whistleblowing policy &amp; YourVoice website, N/A]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: In its Modern Slavery Statement for 2019, the Company discloses the following related to reports to the YourVoice system: 'No alerts related to modern slavery or human trafficking within Anglo American or our supply chain were received in 2019'. In the Sustainability report it indicates that 'grievances that involved human rights aspects constituted 3% of the total grievances received. The main drivers for these grievances are incidents impacting potentially vulnerable groups, and land and land resettlement'. It also states that 'in Brazil, we received six grievances against contractors who were accused of sexual harassment and/or assault'. The Company indicates that in 2019 'we received 505 reports through YourVoice, a 55% increase from 2018, following a successful awareness campaign and a concerted effort to foster a culture where employees can raise their concerns with confidence.' Although the Company, as indicated above, refers that 3% of the total grievances were related to human rights, it is not clear how many were addressed or resolved. [Modern Slavery Act Statement 2019, 2020: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages: The YourVoice website is available in over 15 different languages. [YourVoice website, N/A]</li> <li>• Met: Opens own system to EX BPs workers: The Whistleblowing policy states that 'The YourVoice programme is available to all employees (including contractors), customers, suppliers and other stakeholders of Anglo American.' [Whistleblowing Policy Update 2019, 15/5/2019: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Whistleblowing policy explains 'The YourVoice programme is available to all employees (including contractors), customers, suppliers and other stakeholders of Anglo American.' The scope of reportable issues includes breaches of the Code of Conduct. Additionally, 'While local stakeholders should be encouraged to use the site grievance mechanism where they feel comfortable to do so, Your Voice serves as an alternative, confidential way to lodge complaints when site grievance mechanisms have not been successful, or when grievances pertain to fundamental corporate values'. In the SEAT document the Company explains social incidents, complaints and grievance procedures to be implemented in throughout the life cycle of operations. 'All procedures should allow for complaints to be presented 'in person to elected community members and /or non-governmental organisations (NGOs) who will gather and forward stakeholder concerns'. In addition to the site-based procedure, the SEAT also refers to the 'Speak-up' whistleblowing programme. [Whistleblowing Policy Update 2019, 15/5/2019: <a href="http://angloamerican.com">angloamerican.com</a> &amp; SEAT Toolbox: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The YourVoice website is available in many different languages. In addition, according to the SEAT, 'every exploration site, project and operation is required to have a social incidents procedure. This provides mechanisms for addressing incidents and stakeholder concerns before they escalate'. The grievance procedure should be 'a transparent, clearly structured, simple and culturally appropriate process whereby stakeholders can submit their complaints and grievances free of charge and, if necessary, anonymously, or via third parties'. Procedures should allow complaints to be submitted in more than one format, including: 24 hour telephone hotline, in person to identified staff members, in writing by hard-copy or via email, in person to elected community member and/or NGOs who will gather and forward stakeholder complaints/concerns to the operation, or informally through employees on behalf of a community in which they live. [YourVoice website, N/A]</li> <li>• Met: EX BPs communities use global system: The YourVoice programme is available to contractors and suppliers and additional grievance mechanisms are put in place for external stakeholders at Company sites. [Whistleblowing Policy Update 2019, 15/5/2019: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: In Platinum operation in South Africa there were social unrest incidents within host communities. They had impact on mining and processing operations. In relation to this case, the Company indicates that: 'The effect of all potential unrest incidents was minimised through a proactive approach in which Social Performance teams, local government, community leader and established community task teams play a pivotal role. Once Protection Services receives information that the community is planning to disrupt the activities of an operation, the Protection Services Manager, in collaboration with state security agencies, municipal traffic agencies and road management companies further serves to ensure that Protection Services receive early warning about social unrest on public roads outside the immediate vicinity of the Platinum operation. This early warning system allows Protection Services to adjust product movement routes to avoid affected areas'. [Annual report on the voluntary principles on security and human rights, 2017: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition: The Company states that following: 'There were no serious cases of non-compliance across the Group. The cases of moderate non-compliance did not impact stakeholders and plans are in place to remedy these non-compliances. Each operation implements an improvement plan to meet requirements that are not met in full.' 'In South Africa, we place a strategic focus on collaborating with stakeholders to mitigate social conflict and promote socio-economic development across Limpopo province, which hosts several of our PGM and diamond assets. This includes partnering to promote regional water conservation and develop agricultural initiatives that optimise the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>use of available land on a regional scale. The Eastern Limb of South Africa's Platinum Belt in particular has experienced community unrest, related to grievances over the lack of socio-economic opportunities.' It also talks about engaging regularly with stakeholders. However, no evidence of changes introduced to prevent similar adverse impacts could be found. No further relevant details found in the latest sustainability report. [Sustainability Report 2018, 2018: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Approach to learning from incident to prevent future impacts: 'Level 3–5 (moderate to significant) social incidents are reported to the Board and included in the chief executive's quarterly performance scorecard. Stakeholder complaints and grievances provide valuable indicators to help operations anticipate deeper community concerns and proactively mitigate social risks. We continue to improve social incident and grievance management to enhance the accuracy and consistency across the Group in identifying, reporting and classifying complaints and grievances. Business units receive Group-level support with incident classification and management, as well as with implementing appropriate remedial measures and closing-out social incidents'. The Social Way toolkit requires to 'undertake regular analysis of the frequency, patterns and causes of grievances to learn how site risk and impact management should be improved'. However, it is not clear what changes would be introduced as a result of lessons learnt. No further relevant details found in latest revision. [Sustainability Report 2018, 2018: <a href="http://angloamerican.com">angloamerican.com</a> &amp; The Social Way: 3B Incident and Grievance Management: Task 2, N/A: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> <li>• Not met: Evaluation of the channel/mechanism: The Company states the following: 'Every year, we commission independent assessments of our sites' social performance and compliance with The Social Way through the Social Way Assurance Framework. We use the results of these assessments to drive improvements.' However, it is unclear if there has been a specific evaluation of the effectiveness of the grievance mechanism. The social way requires to 'establish a process for the regular analysis and evaluation of the grievance process and adjust the process according to the findings. No further details found, including how the evaluation takes place. [Sustainability Report 2019, 3/2020: <a href="http://angloamerican.com">angloamerican.com</a> &amp; The Social Way: 3B Incident and Grievance Management: Task 2, N/A: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> </ul>



## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Colombia's Constitutional Court decided to suspend Cerrejon's permit to divert stream over lack of consultations with local indigenous groups.</li> <li>• <b>Area:</b> Environment/Right to land/Right to livelihood/Right to security of persons</li> <li>• <b>Story:</b> Anglo American is a joint-venture partner (with Glencore and BHP Billiton) in the Cerrejon coal mine in Colombia. On August 21, 2017 Colombia's Constitutional Court suspended Cerrejon's permit to divert a stream because of inadequate consultation with local indigenous groups. The court postponed the start of mining activity towards the natural course of Bruno Creek for a period of three months while it considered an application for the protection of constitutional rights (tutela) relating to the communities of La Horqueta, Paradero and Gran Parada. In November the court found the project to divert the river would indeed threaten fundamental rights. The Constitutional Court also ordered that works continue on the maintenance, stabilization, and preservation of the new course in accordance with the respective environmental plan and the authorizations granted by the environmental authorities. It is also alleged that the transnational mining conglomerate Carbones del Cerrejón, who owns the El Cerrejón mine, consumes 24 million liters of water per day in a department like Guajira where 87 percent is desert. The population is experiencing a dramatic shortage of water, which in the last two years has reportedly caused the death of hundreds of children due to malnutrition and the diseases caused by water scarcity. In February 2019, indigenous and afro-descendent communities in the state of La Guajira launched a legal challenge against a recent modification of the environmental license for the Cerrejón coal mine. They argued that the alteration was carried out without an Environmental Impact Assessment, and requested the suspension of any further alteration of the license that would allow an expansion of mining activities. Jakeline Romero, a plaintiff from the community organisation, Fuerza de Mujeres Wayúu, said that the mine has impacted on the health of the Wayúu people, as well as impacting on the environment and access to water. The legal team claimed that the expansion of the mine would exacerbate the current humanitarian crisis in La Guajira caused by the mine, including a loss of food security and lack of access to water that has influenced the deaths of 5,000 children and malnutrition of 40,000. The Indigenous Wayuu people of Colombia have also alleged that when the Cerrejon coal mine opened the river they rely on to grow crops began to dry up and became contaminated. The Guardian also stated in an October 2018 article that: "In the neighbouring department of El Cesar, three Drummond mine union leaders were murdered in 2001. More recently in La Guajira, activists who resist Cerrejón's expansion plans have received renewed death threats. Despite the 2016 Colombian Peace Agreement, there has been a spike in assassinations of social leaders nationwide. At least 123 were murdered in the first six months of 2018".</li> <li>• <b>Sources:</b> [Business &amp; Human Rights Centre - 21/08/2017 -: <a href="https://www.business-humanrights.org/en/latest/news-and-analysis/colombian-constitutional-court-suspends-permit-to-divert-stream-at-cerrejon-coal-mine/">business-humanrights.org</a>][ Mines and Communities - 27/02/2016 : <a href="https://www.londonminingnetwork.org/news/2016/02/27/colombian-constitutional-court-suspends-permit-to-divert-stream-at-cerrejon-coal-mine/">londonminingnetwork.org</a>][The Guardian, 1/10/2018: <a href="https://www.theguardian.com/environment/2018/oct/01/colombia-constitutional-court-suspends-permit-to-divert-stream-at-cerrejon-coal-mine/">theguardian.com</a> -][Business &amp; Human Rights Centre - 2/03/2019: <a href="https://www.business-humanrights.org/en/latest/news-and-analysis/colombian-constitutional-court-suspends-permit-to-divert-stream-at-cerrejon-coal-mine/">business-humanrights.org</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Public response available: Though Cerrejon itself has responded in detail, Anglo American has not responded publicly to the allegations, nor has it pointed to Cerrejon's comments and therefore does not meet CHRB indicator. [Cerrejon response, November 2018: <a href="https://www.cerrejon.com/">cerrejon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Response goes into detail: Though Cerrejon itself has responded in detail, Anglo American has not responded publicly to the allegations, nor has it pointed to Cerrejon's comments and therefore does not meet CHRB indicator. [Cerrejon response, November 2018: <a href="https://www.cerrejon.com/">cerrejon.com</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Company policies address the general issues raised: With regards to water the Company states on its website: 'To maintain our license to operate, we cannot degrade water quality or compromise the access rights of other users'. It also states in its Group water policy that one of its principles is 'recognizing water as an environmental and human right'. It has also disclosed its 'Water Policy' which states as one of its five fundamental principles "Our stakeholders – recognizing water as an environmental and human right whilst identifying, developing and implementing collaborative solutions with our stakeholders". In relation to land rights Anglo American says "All Anglo American managed sites</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>shall seek to avoid and, when avoidance is not possible, minimise involuntary resettlement wherever feasible by exploring alternative project designs. Where resettlement is unavoidable, projects shall follow the IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement...Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement". This is not sufficient for a commitment to respecting ownership and land use. The company has a commitment to the UDHR. [Group water policy 2018, 3/7/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Social Way: <a href="https://australia.angloamerican.com">australia.angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Policies apply to the type of business relationships involved: The 'Social Way' document states that "Where Anglo American does not manage, but is linked to, an activity through its business relationship, it shall seek to influence the management of social risks and impacts in accordance with this standard." Additionally in its 'Responsible Sourcing Standards for Suppliers' state "This Standard applies to all persons or businesses either doing or wishing to do business with Anglo American. This includes persons conducting businesses on our behalf (contractors, agents and intermediaries)." [Social Way: <a href="https://australia.angloamerican.com">australia.angloamerican.com</a> &amp; Group water policy 2018, 3/7/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: The SEAT document includes a tool for resettlement planning and implementation. It states that these risks and negative impacts are 'often particularly harsh for poor and vulnerable groups', It provides a definition of these groups and states that it conducts socio-economic surveys 'of all affected people, with specific identification of poor and other vulnerable groups'. However, no evidence found in relation to how it identifies rights holders, with particular attention to vulnerable tenure rights holders in new or on-going resettlements. Additionally the company has not endorsed the CEO Water Mandate. The company is a participating member of the Voluntary Principles on Security and Human Rights [SEAT Toolbox: <a href="https://angloamerican.com">angloamerican.com</a>]</li> </ul>
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: In a letter published online, Lina Echeverri, Vice President of Public Affairs and Communication at Cerrejon, says that the company has engaged in consultations with the members of the Roche community to discuss issues of re-settlement, water shortages and compensation payments. Additionally the company also outlines the consultations undertaken with nearby communities in relation to the modification of the Bruno Creek riverbed [Cerrejon letter Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Cerrejon work group Bruno Creek, 09/05/2019: <a href="https://cerrejon.com">cerrejon.com</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: The CHRB was unable to find any publicly available evidence of Anglo American encouraging its linked business (Cerrejon) to engage with the affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: The letter from Cerrejon's Lina Echeverri, states that internal conflicts between the Roche Black Afro-descendent Community Council and its legal representatives resulted in "a situation preventing an agreement being reached" of which subsequently the Ministry of the Interior officially protocolised the consultation without an agreement. The letter states "We understand that, with this result, the expectation of many families who hoped to gain access to the compensations and indemnification have not been met". On the basis of this evidence no remedy has been provided to the affected community stakeholders. [Cerrejon letter Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Has reviewed management systems to prevent recurrence: The CHRB has not identified any publicly available evidence that Cerrejon has reviewed its management systems in light of the engagement with the Roche community to prevent similar complications and impacts occurring in the future. [Cerrejon letter Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: Cerrejon has not provided any compensation to the 33 families identified as beneficiaries on the basis Council of State of criteria defined by the Council of State, thus remedy cannot be considered satisfactory. [Cerrejon letter Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Has improved systems and engaged affected stakeholders: The CHRB has not identified any publicly available evidence that Cerrejon has improved its</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			management systems in light of the engagement with the Roche community to prevent similar complications and impacts occurring in the future. [Cerrejon letter Roche Community, 29/01/2019: <a href="http://business-humanrights.org">business-humanrights.org</a> ]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: Minas Gerais to fine Anglo American USD 37.73 million after pipe leak</li> <li>• Area: Environmental damage</li> <li>• Story: On April 4, 2018, the Brazilian state of Minas Gerais imposed a BRL 125.6 million (USD 37.73 million) fine on Anglo American for pollution caused by the March 12 spills from a pipeline that carries iron ore from the company's Minas-Rio mine. The leak forced the company to suspend operations until March 7, 2018. According to Semad, the environmental regulator for Minas Gerais, the spill caused pollution and environmental degradation that resulted in damage to water resources and may have caused harm to public health and the wellbeing of the population. It also caused water supply to the local population to be interrupted.</li> </ul> <p>Semad also said it required the company to clean the stream where the spill occurred and resume water supply to the local population which was interrupted due to the incident. On March 29, 2018, two days after the resumption, a second leak in the same pipeline occurred 400 meters away, prompting the company to again halt operations for 90 days while it completed an inspection. In regard to the second leak, Semad said it was still studying the incident and would announce a fine in that case as well.</p> <ul style="list-style-type: none"> <li>• Sources: [Mining.com - 05/04/2018: <a href="http://mining.com">mining.com</a>][Reuters - 05/04/2018: <a href="http://reuters.com">reuters.com</a>]</li> </ul>
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available [Pipeline information Center: <a href="http://brasil.angloamerican.com">brasil.angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: Anglo American provides extensive details on the Minas Gerais pipeline leak. The page includes information concerning the source of the incident, the areas affected, a timeline of events, and data on the resumption of operations. [Pipeline information Center: <a href="http://brasil.angloamerican.com">brasil.angloamerican.com</a>]</li> </ul>
E(2).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: Anglo American states that its "environmental vision is to minimize harm to the environment by designing, operating and closing all of our operations in an environmentally responsible manner." In addition, Anglo American must perform Environmental, Health and Social Impact Assessments and other authorizations and approvals, including commitments made as part of the application process prior to company operations. [Environment: <a href="http://angloamerican.com">angloamerican.com</a> &amp; Safety, Health, and Environment (SHE) way, 3/2017: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: Anglo American states that "every business or operation must ensure that they determine and fulfil all of the requirements relating to their SHE compliance obligations which include all applicable SHE legal requirements and any other SHE requirements that we must or choose to comply with." Moreover, the company expects all "...consultants, agents, contractors and suppliers to follow our [Anglo American] policies and requirements relating to SHE management and practices." [Safety, Health, and Environment (SHE) way, 3/2017: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: The policies address the specific right of environmental protection as states that it designs, builds, operates, rehabilitates and closes all company operations in an environmentally controlled and responsible manner that minimizes pollution and eliminates where possible or prevents irreversible environmental impacts. However, it is not signatory to the CEO Water Mandate. [Safety, Health, and Environment (SHE) way, 3/2017: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
E(2).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: Anglo American reports that it has engaged in dialogue with the affected local communities. The company's website states that it has provided regular updates to the local population and relevant authorities. [Pipeline information Center: <a href="http://brasil.angloamerican.com">brasil.angloamerican.com</a>]</li> <li>• Met: Provides remedies to affected stakeholders: The company suspended operations in the affected area but resumed operations later in December 2018 after performing repairs on the leaking sections of pipeline. After the detection of the leak on March 12, work immediately started on the containment and drainage</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>of the affected area. Water samples were also collected from the Santo Antonio do Grama creek together with Suatrans, a company specialized in environmental emergencies, and with Senai (National Industrial Training Service). During the clean-up, Anglo American assured water supply to population with water tank trucks and bottled water. As of March 2018, the clean-up of the Santo Antonio do Grama creek, impacted by the first leak on 12 March, was still ongoing, involving some 200 people, half of which were local residents. [Pipeline information Center: <a href="http://brasil.angloamerican.com">brasil.angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Has reviewed management systems to prevent recurrence: In response to the spill, Anglo American started the internal inspection of the entire length of the Minas-Rio pipeline, with the help of PIGs (pipeline investigation gauges) manufactured to order, equipped with sensors that can accurately detect any signs of dents, corrosion or cracks in the pipe. [Pipeline information Center: <a href="http://brasil.angloamerican.com">brasil.angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Met: Has improved systems and engaged affected stakeholders: In response to the spill, Anglo American started the internal inspection of the entire length of the Minas-Rio pipeline, with the help of PIGs (pipeline investigation gauges) manufactured to order, equipped with sensors that can accurately detect any signs of dents, corrosion or cracks in the pipe. [Pipeline information Center: <a href="http://brasil.angloamerican.com">brasil.angloamerican.com</a>]</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Headline: Mineworkers and gold producers including Anglo American reach a settlement over lung diseases class action</li> <li>• Area: Health &amp; Safety</li> <li>• Story: On May 3rd, 2018, South African gold producers including Anglo American reached a class action settlement with law firms representing thousands of miners who contracted the fatal lung diseases silicosis and tuberculosis while working for them. The settlement of USD 400 million was signed by Richard Spoor Inc, Abrahams Kiewitz Inc and the Legal Resources Centre, representing the affected workers, and the Occupational Lung Disease Working Group, which acted on behalf of African Rainbow Minerals, Anglo American, AngloGold Ashanti, Gold Fields, Harmony Gold and Sibanye-Stillwater.</li> </ul> <p>Anglo American no longer has an interest in gold mining.</p> <ul style="list-style-type: none"> <li>• Sources: [Financial Times - 03/05/2018: <a href="http://ft.com">ft.com</a>][Mining.com - 3/5/2018: <a href="http://mining.com">mining.com</a>][Media release - 3/5/2018: <a href="http://mining.com">mining.com</a>]</li> </ul>
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The Company states: "Through our active participation in an Occupational Lung Disease Working Group, which was formed in 2014, Anglo American South Africa (AASA) together with five other mining companies (African Rainbow Minerals, AngloGold Ashanti, Gold Fields, Harmony and Sibanye Stillwater) – concluded a settlement agreement on 3 May 2018 in the silicosis and tuberculosis class-action litigation with the claimants' lawyers" [Response letter to Business &amp; Human Rights Resource Centre, July 2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The Company states: "This is an historic settlement, resulting from three years of extensive negotiations. The Agreement provides meaningful compensation to all eligible workers suffering from silicosis and or tuberculosis who worked in gold mines – which these companies either owned or operated or to which they previously provided technical services (as was the case with AASA) – from 1965 to date." [Response letter to Business &amp; Human Rights Resource Centre, July 2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company has a Health &amp; Safety policy. [Code of conduct, 25/10/2016: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Code of conduct, 25/10/2016: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company discloses its injury frequency rates. [Sustainability Report 2018, 2018: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: The Company states that "This is an historic settlement, resulting from three years of extensive negotiations." [Response letter to Business &amp; Human Rights Resource Centre, July 2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Provides remedies to affected stakeholders: The Company states that "The Agreement provides meaningful compensation to all eligible workers suffering from silicosis and or tuberculosis who worked in gold mines". [Response letter to Business &amp; Human Rights Resource Centre, July 2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Remedies are satisfactory to the victims: The Company states regarding the settlement that "The parties believe the settlement represents a fair outcome for claimants, and a sustainable outcome for the companies." [Response letter to Business &amp; Human Rights Resource Centre, July 2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system.</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• Headline: One worker dead and four others critically injured in accident at Moranbah North Coal Mine in Australia</li> <li>• Area: Health &amp; Safety</li> <li>• Story: 20 February 2019, A mine site in Queensland owned by Anglo American was forced to temporarily halt its operations following the death of a worker in an underground collision involving two vehicles. A total of 10 people were injured in the incident, four of whom had to be taken to hospital by helicopter for further treatment. In a statement at the time, Anglo's executive head of underground operations, Glen Britton, said the mine would remain in shutdown until operations could be safely resumed..."The Queensland Mines Inspectorate investigation is underway and the mine remains in shutdown until operations can be safely resumed...". Subsequently, in March 2020, the Department of Natural Resources Mines and Energy confirmed the inspectorate had charged Anglo American with the mine workers death. A spokeswoman from Anglo American said "It's very early in the legal process and we will be seeking further details to respond to the conclusions reached by the department and the evidence upon which those conclusions are based...The safety and wellbeing of our people is our priority".</li> <li>• Sources: [Australian Broadcasting Corporation - 21/02/2019: <a href="https://abc.net.au">abc.net.au</a>][Australian Mine Safety Journal - 20/02/2019: <a href="https://amsj.com.au">amsj.com.au</a>][Australian Financial Review - 03/03/2020: <a href="https://afr.com">afr.com</a>]</li> </ul>
E(4).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company has responded publicly to the incident and the subsequent legal action. [Response to Moranbah North mine incident: <a href="https://abc.net.au">abc.net.au</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The company's response to the original incident goes into detail. In a statement issued shortly after the incident, Anglo said the collision occurred "in the access drift close to the surface of the mine...the driver of the grader received immediate treatment on site and was then transported by ambulance to hospital, but has tragically passed away...the 10 employees who were in the other vehicle immediately received medical treatment on site for injuries and subsequently two people have been transported by helicopter to Mackay and two people to Rockhampton for further treatment...the other six people were assessed on site but needed no further treatment." Additionally in the safety section of its annual report the company notes "Metallurgical Coal suffered one loss of life during 2019, when... lost his life in a mobile equipment related incident at Moranbah North mine in Queensland. The lost-time injury frequency rate decreased by 41% to 4.32 (2018: 7.33), and the total recordable case frequency rate decreased by 31% to 6.20 (2018: 9.04). The business safety improvement plan is focused on Elimination of Fatalities. Improvements have been made in operational risk management and critical control management, as well as operational planning and cultural and behavioural change." [Response to Moranbah North mine incident: <a href="https://abc.net.au">abc.net.au</a> &amp; Integrated Annual Report 2019, 2020: <a href="https://australia.angloamerican.com">australia.angloamerican.com</a>]</li> </ul>
E(4).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company has a publicly available policy on Health, Safety and the Environment, which outlines the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>management system frameworks for these risks. [Safety, Health, and Environment (SHE) way, 3/2017: <a href="http://angloamerican.com">angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Policies apply to the type of business relationships involved: The policy applies to Anglo American's operations. [Safety, Health, and Environment (SHE) way, 3/2017: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The company discloses qualitative information of health and safety, relating to injuries, lost days and fatalities. [Safety, Health, and Environment (SHE) way, 3/2017: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
E(4).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: The company has engaged with the affected stakeholders, Anglo's executive head of underground operations, Glen Britton, said the mine would remain in shutdown until operations could be safely resumed..."Our focus is currently on supporting Bradley's family and our colleagues...We spent today talking to our employees about the incident and there is a great deal of shock and sadness...The Queensland Mines Inspectorate investigation is underway and the mine remains in shutdown until operations can be safely resumed." [Response to Moranbah North mine incident: <a href="http://abc.net.au">abc.net.au</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: There is no publicly available evidence that Anglo American has provided remedy to the affected stakeholders.</li> <li>• Not met: Has reviewed management systems to prevent recurrence: In reference to the incident, the company says in its latest Annual Report "The business safety improvement plan is focused on Elimination of Fatalities. Improvements have been made in operational risk management and critical control management, as well as operational planning and cultural and behavioural change." However there is insufficient detail as to what review took place following the incident. [Integrated Annual Report 2019, 2020: <a href="http://australia.angloamerican.com">australia.angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: There is no publicly available evidence that Anglo American has provided remedy to the affected stakeholders.</li> <li>• Not met: Has improved systems and engaged affected stakeholders: In reference to the incident, the company says in its latest Annual Report "The business safety improvement plan is focused on Elimination of Fatalities. Improvements have been made in operational risk management and critical control management, as well as operational planning and cultural and behavioural change." However there is insufficient detail as to what these improvements actually entail. [Integrated Annual Report 2019, 2020: <a href="http://australia.angloamerican.com">australia.angloamerican.com</a>]</li> <li>• Not met: Denies allegations, but implements review recommendations</li> <li>• Not met: Denies allegations, and ensures systems prevent such impacts</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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