

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Anglo American
Industry Extractives
Overall Score (*) 52.0 out of 100

Theme Score	Out of	For Theme
7.7	10	A. Governance and Policies
16.1	25	B. Embedding Respect and Human Rights Due Diligence
8.3	15	C. Remedies and Grievance Mechanisms
11.9	20	D. Performance: Company Human Rights Practices
1.3	20	E. Performance: Responses to Serious Allegations
6.8	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2018 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

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"> • Met: General HRs commitment: The human rights policy includes 'recognition of all internationally-recognised human rights: In particular: those contained in the International Bill of Human Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work'. [Human rights policy: angloamerican.com] • Met: UDHR: See above [Human rights policy: angloamerican.com] • Met: International Bill of Rights: See above [Human rights policy: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: The Company is a 'supporter of the UN Guiding Principles on Business and Human Rights' [Human rights policy: angloamerican.com]
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"> • 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: angloamerican.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: All four ILO apply to EX BPs: The Responsible Sourcing Standards for suppliers applies to 'all persons or business either doing or wishing to do business with Anglo American'. It includes contractors, agents and intermediaries. These standards explicitly include all ILO core labour areas and a specific section for health and safety of suppliers' workforce. [Responsible sourcing standards for suppliers: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: See above. [Code of conduct: angloamerican.com] • Met: Respect H&S of workers: The code also contains the Commitments on workers' health and safety. [Code of conduct: angloamerican.com] • Met: H&S applies to Ex BPs: See above. [Code of conduct: angloamerican.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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"> • Met: VPs participant: The Company is a signatory to the Voluntary Principles on security and human rights. The policy applies to relationships with employees, contractors and other public and private sector business partners. [Social Way & Human rights policy: angloamerican.com] • Met: Respecting indigenous rights: The Social Way document describes the governing framework for social performance. Regarding indigenous peoples, it indicates that: 'Anglo American recognises the potential vulnerability of Indigenous Peoples and shall: Respect the rights, interests, special connections to lands and water, and perspectives of Indigenous Peoples, where mining projects are to be located on lands traditionally owned by our under customary use of Indigenous Peoples'. [Social Way & Human rights policy: angloamerican.com] • Met: Expects BPs to respect these rights: See above <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: Regarding empower vulnerable and marginalised groups, the document states that 'this includes our recognition of the right of Indigenous Peoples to Free, Prior and Informed Consent (FPIC) as stated in the International Council of Mining and Metals (ICMM) Position Statement on Indigenous Peoples and Mining and reflected in the UN Declaration on the Rights of Indigenous Peoples. [Human rights policy: angloamerican.com & Social Way] • Met: IFC performance standards: Specifically on land rights, the Company indicates that 'where resettlement is unavoidable, projects shall follow the IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement'. [Human rights policy: angloamerican.com & Social Way] • Met: Respecting the right to water: Finally, one of the principles of the Company's water policy, in relation to stakeholders is 'recognizing water as an environmental and human right whilst identifying, developing and implementing collaborative solutions with our stakeholders. It is not clear, however, whether this commitment is extended to extractive business partners. [Group water policy, 2010: angloamerican.com] • Not met: Expects BPs to respect all these rights: See above
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"> • Met: Commits to stakeholder engagement: The Company's Social Way document describes the governing framework for social performance. Regarding stakeholder engagement commitment, it states that all sites shall develop a Stakeholder engagement plan which shall 'identify, profile, analyse affected communities and other stakeholders or groups, in particular those who may be disadvantaged or particularly vulnerable to adverse impacts' and 'ensure that the views of affected communities and other interested stakeholders, including those of vulnerable and marginalised groups, are incorporated into Anglo American decision-making as appropriate'. The document also indicates that 'to ensure that they are able to express their views on positive opportunities, risks, adverse impacts, as well as prevention and mitigation measures. Effective engagement and participation allows us to consider and respond to stakeholders' views in a proactive way'. [Social Way] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: See above.
A.1.5	Commitment to remedy	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"> • 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'. Also, the Social Way document indicates that effective social performance is linked to respect for human rights, meaning 'avoiding, preventing, mitigating and, where appropriate, remediating adverse human rights due diligence'. [Human rights policy: angloamerican.com & Social Way]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: Social way document states that managed sites shall ensure 'Clear communication that the existence of the complaints and grievance mechanism does not preclude the right of stakeholder to engage in judicial or other legitimate processes, in which Anglo American is committed to cooperate'. [Social Way] • Not met: Work with EX BPs to remedy impacts: The Anglo American Social Way specifies that relevant requirements apply to 'contractors, subcontractors and any other business partners under AA management'. In addition 'it sets out clear requirements for all Anglo American managed sites to ensure that systems are in place to: engage with affected and interested stakeholders; avoid, prevent, mitigate and, where appropriate, remediate adverse social impacts-, and maximises development opportunities'. However, there is no further information on how the Company works with its business partners to remedy adverse impacts either using partners' own mechanisms or collaborating with them on the development of third party non-judicial remedies. [Social Way]
A.1.6	Commitment to respect the rights of human rights defenders	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"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Sustainability report indicates that 'during 2017, Anglo American participated in the Business Network on Civic Freedoms and Human Rights Defenders, convened by the International Service for Human Rights and the Business and Human Rights Resource Centre'. However CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> • Met: CEO or Board approves policy: The Company's human rights policy has been 'approved by Anglo American's Corporate Committee'. [Human rights policy: angloamerican.com] • Met: Board level responsibility for HRs: The document also indicates that accountability for implementation 'lies with the Group Chief Executive and with the Chief Executives of the business units'. The CEO is member of the Sustainability Committee, which oversees human rights. [Human rights policy: angloamerican.com & CEO description on website] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company's CEO participated, in late 2016 as speaker in the UN forum on Business and Human rights in late 2016: 'Leadership and Leverage: Embedding human rights in the rules and relationships that drive the global economy'. [UN forum on Business and Human Rights, 11/2016: ohchr.org]
A.2.2	Board discussions	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"> • Met: Board/Committee review of salient HRs: The Sustainability Committee oversees on behalf of the board the management of different issues, including safety, human rights, indigenous peoples, etc., It met four times in 2017, and its responsibilities include the review of Company's performance in relation the issues mentioned. [Sustainability Committee terms of reference: angloamerican.com] • Met: Examples or trends re HR discussion: Particularly in 2017, the Committee discussed different human rights related issues, including social way assessment results, and safety issues. Safety issues include a review of the incidents that led to fatalities during the year, 'the factors surrounding the incidents, mitigation steps being taken and the process for formal investigation. Following completion of independent investigations, findings are presented to the committee'. [Annual report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both examples and process
A.2.3	Incentives and performance management	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"> • Met: Incentives for at least one board member: Some Company's directors have performance management schemes linked to performance on safety and the CEO linked to the deployment of the Code of conduct and the Approval of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Sustainability Strategy. [Sustainability report, 2017: angloamerican.com & Annual report, 2017: angloamerican.com]</p> <ul style="list-style-type: none"> • Not met: At least one key EX RH risk, beyond employee H&S: No evidence found of these schemes including health and safety performance of local communities and extractive business partners, or referring to other specific salient human rights risk. [Annual report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: The Annual report shows how these performance issues are integrated in the remuneration. [Annual report, 2017: angloamerican.com]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	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"> • Met: Senior responsibility for HR (inc ILO): The Sustainability report indicates that the Board delegates executive responsibilities to the chief executive and the Group Management Committee; 'social performance and human rights fall within the ambit of Anik Michaud, Group director - Corporate Relations. 'Tony O'Neill, technical director, holds accountability for matter related 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, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: Although the Company indicates that its approach to managing human rights is cross-functional and a human rights working group meets each quarter, no further details have been found regarding how day-to-day responsibility is allocated across the range of relevant functions. [Sustainability report, 2017: angloamerican.com] • Not met: Day-to-day responsibility for EX BRs: Regarding value chain, the Company indicates that it has a Modern Slavery working group that is cross-functional and aims to refine the approach to responsible sourcing. However, it is not clear whether this working group handles day-to-day value chain issues, including extractive business partners. [Sustainability report, 2017: angloamerican.com]
B.1.2	Incentives and performance management	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"> • Met: Senior manager incentives for human rights: The Sustainability report indicates that 'Anglo American's safety results affect the performance-based remuneration of all employees in the business'. The annual performance incentives for executives and senior management include 'safety incidents'. The sustainability report states that 'level 3-5 (moderate to significant) social incidents are reported to the Board and included in the chief executive's quarterly performance'. [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: At least one key EX HR risk, beyond employee H&S: No evidence found on whether safety performance include health and safety of local communities and extractive business partners. [Annual report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public: No evidence found of details on the criteria linking the remuneration for managers that are not board members.
B.1.3	Integration with enterprise risk management	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"> • Met: HR part of enterprise risk system: The risk management section of the Annual report considers safety to be a part of the Company's principal risks and as such is included in the risk management system. This includes safety risk root causes, impacts, mitigation, and level of risk compared to previous year Although no evidence has been found of other human rights-related risks within this principal risks list, the Company indicates in the SEAT document that 'the annual operational risk assessment requires that each operation builds an understanding of the inherent risks that issues and impacts may present to both the operation and to both operation and to affected stakeholders. The socio-economic issues and impacts are assessed alongside other discipline risks using Anglo American's Integrated Risk Management (IRM Matrix)'. These risks include those related to safety, communities and social, including human rights. [Annual report, 2017: angloamerican.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment: No evidence found regarding assessment of the adequacy of the enterprise risk management systems in managing human rights during last reporting year, although can be mentioned that the Audit Committee reviewed the implementation plan for the Code of conduct. [Annual report, 2017: angloamerican.com]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> Met: Communicates its policy to all workers in own operations: The Company's code of conduct is available on the website in English, Spanish and Portuguese. In the Sustainability report the Company indicates that the engagement programme for the code 'has encompassed all of our employees across a range of different cultural, educational and literacy backgrounds. The approach has been to train team leaders to facilitate discussions on ethical dilemmas and personal action commitments with their employees'. [Approach and policies: angloamerican.com & Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Communication of policy commitments to stakeholder: Regarding communication to stakeholders, the Human rights policy, which contains a commitment to the 'International Labour Organisation's Declaration on Fundamental Principles and Rights at work', also commits to 'actively communicating this policy to internal and external stakeholders, including awareness raising and training on human rights related issues'. [Human rights policy: angloamerican.com] Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> Met: Steps to communicate policy commitments to BRs: Regarding communication to business relationships, the Company indicates that in 2017 it raised awareness about responsible sourcing requirements among suppliers: 'building on our initial work in 2016 with 19 host community suppliers at Platinum's Mogalakwena operation, in 2017 we' undertook a similar initiative with 15 host community suppliers at De Beers' Venetia operation'. IT included training workshops and completing self-assessment questionnaires. [Sustainability report, 2017: angloamerican.com] Met: Including to EX BPs: See above [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: How HR commitments made binding/contractual: The responsible sourcing standards for suppliers apply to all persons or businesses doing or wishing to do business with the Company. The Sustainability report indicates that 'our standard contract terms require acceptance of these requirements and for suppliers to submit self-assessment questionnaires. Regarding security personnel, implementation of VPs include incorporating VP clauses in commercial contracts or agreements with security providers. [Sustainability report, 2017: angloamerican.com & Responsible sourcing standards for suppliers: angloamerican.com] Met: Including on EX BPs: See above [Sustainability report, 2017: angloamerican.com & Responsible sourcing standards for suppliers: angloamerican.com]
B.1.5	Training on Human Rights	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"> Not met: Trains all workers on HR policy commitments: According to the Sustainability report, 'Standardised security and human rights training material is implemented across the Group. In 2017, nearly 3,400 employees and contractors participated in security-related human rights training and relevant employees receive induction or refresher training on security and human rights. All employees and contractors receive training on our Code of conduct, which encompasses human rights'. [Sustainability report, 2017: angloamerican.com] Met: Trains relevant managers including security personnel: See above, security is covered by human rights training. [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met: The Code of conduct was launched at the end of 2016, and in 2017 'we hosted more than 200 workshops in which more than 3,000 individuals received Code of conduct training, which will be offered on a continuous basis'. Specifically, 'more than 3,400 leaders were trained to facilitate Code of Conduct engagement sessions with employees at all levels'. 'The approach has been to train team leaders to facilitate discussions on ethical

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			dilemmas and personal action commitments with their employees'. Therefore, not all employees company-wide have received yet training on the Company's policies containing human rights commitments. [Sustainability report, 2017: angloamerican.com]
B.1.6	Monitoring and corrective actions	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"> • Met: Monitoring implementation of HR policy commitments: The Social Way document applies to 'the entire life cycle of the Company's activities'. It includes the commitment to respect human rights: 'This commitment applies to all universally recognised human rights, in particular [...] the ILO Declaration on Fundamental Principles and Rights at Work'. Social Way is implemented through the Company's 'Socio-Economic Assessment Toolbox' (SEAT). The SEAT includes a comprehensive description of human rights issues to review including explicitly all ILO core areas in detail. <p>The Sustainability report indicates that 'each site is assessed annually against the Social Way requirements', and includes information on last years' assessment and comparison against previous ones. [Sustainability report, 2017: angloamerican.com & SEAT Toolbox: angloamerican.com]</p> <ul style="list-style-type: none"> • Met: Monitoring EX BP's: Regarding business relationships, they are audited against the responsible sourcing standards (apply to all persons or business either doing or wishing to do business with Anglo American). The Company reports on working with suppliers to implement controls and practices to better manage the requirements, and conducts follow-up visits and audits. The audits assist in determining the effectiveness of our controls and management processes. [Responsible sourcing standards for suppliers: angloamerican.com & Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes corrective action process: In relation to corrective action processes, 'Social way' describes the 'social incident management', which describes the process to follow after an incident noticed through the site incident management system or through the complaints and grievances procedure. The process includes seven steps including investigation, corrective action, stakeholder engagement, reporting, etc. The Company discloses two serious cases of non-compliance during social way assessments. However, it is not clear whether those two cases where the only ones which required corrective action processes. [Social Way & Sustainability report, 2017: angloamerican.com] • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored: 18 audits were carried out during 2017. No evidence found, however, on the proportion of the extractive business partners that have been monitored. [Sustainability report, 2017: angloamerican.com]
B.1.7	Engaging business relationships	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"> • Met: HR affects selection extractives business partners: The Company indicates in the Sustainability report that 'Our standard contract terms require acceptance of these requirements and for suppliers to submit self-assessment questionnaires'. [Sustainability report, 2017: angloamerican.com] • Met: HR affects on-going business partner relationships: Requirements refer the 'Responsible Sourcing Standard for Suppliers' which covers, among other issues, all ILO core areas. The document, in relation to termination of business relationship indicates that 'We reserve the right to disengage from suppliers who deliberately refuse to comply with legal requirements, this standard, or unable to provide appropriate evidence of steps undertaken to remediate any non-compliance issues'. [Responsible sourcing standards for suppliers: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above [Sustainability report, 2017: angloamerican.com] • Not met: Working with business partners to improve performance: The Company also reports on how it works with suppliers to improve human rights performance, including training workshops, It also describes the works carried out to improve human rights-related performance with a prospective supplier before concluding agreements. However, these examples seem to refer to regular suppliers and not to extractive business partners. [Sustainability report, 2017: angloamerican.com]
B.1.8	Approach to engagement with potentially	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"> • Met: Stakeholder process or systems: The Social Way document contains a section on stakeholder engagement. It requires to all Company's sites to have a stakeholder engagement plan, 'which should be updated annually or more

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	affected stakeholders		<p>frequently as appropriate'. The plan shall 'Identify, profile and analyse affected communities and other stakeholders or groups, in particular those who may be disadvantaged or particularly vulnerable to adverse impacts'. [Social Way]</p> <ul style="list-style-type: none"> • Met: Frequency and triggers for engagement: SEAT devotes a tool to describe how to develop a stakeholder engagement plan (SEP) for the different business operations. The stakeholder engagement plans are ongoing processes with stakeholders that are updated annually. It includes choosing the mode of engagement to reflect both operations' and stakeholder' preferences, activities within the plan and schedule: 'the approach and frequency of engagement activities should reflect the nature and severity of issues and impacts', assuring accessibility through appropriate timing and nature of engagement activities, etc. [SEAT Toolbox: angloamerican.com & Social Way] • Met: communities in the SC engaged [Social Way & SEAT Toolbox: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: Regarding inputs by stakeholders, Social Way indicates that stakeholder engagement plans shall 'ensure that the views of affected communities and other interested stakeholders, include those of vulnerable and marginalised groups, are incorporated into Anglo American decision-making as appropriate'. However, no evidence found in relation to an analysis of the inputs or views given by stakeholders. [Social Way]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Met: Identifying risks in own operations: The Social Way indicates that 'managed sites shall identify, assess and manage social risks and impacts according to the requirements of IFC Performance Standard 1'. Social Way is supported by the SEAT, and all operations 'shall conduct a comprehensive SEAT assessment every three years which will include an assessment of human rights risks and impacts'. 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. [Social Way & SEAT Toolbox: angloamerican.com] • Met: identifying risks in EX business partners: Regarding business relationships, the Social way states that 'managed sites shall put in place procedures to avoid and minimise material adverse social impacts [...] that could arise through engagements with contractors, suppliers and business partners'. Guidance is provided on risk assessment, tender and contractual requirements, and responsibility over their subcontractors, during the pre-contract phase. [Social Way & SEAT Toolbox: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above. [Social Way & SEAT Toolbox: angloamerican.com] • 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. [Social Way & SEAT Toolbox: angloamerican.com] • 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'. [Sustainability report, 2017: angloamerican.com & SEAT Toolbox: angloamerican.com] • Not met: Triggered by new circumstances [Social Way & SEAT Toolbox: angloamerican.com] • Met: Explains use of HRIAs or ESIA (inc HR): See above [Social Way & SEAT Toolbox: angloamerican.com]
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"> • 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: angloamerican.com]

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			<ul style="list-style-type: none"> 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: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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"> 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] Not met: Example of Actions decided [Response to Business & Human Rights Resource Centre, July 2018: business-humanrights.org] Met: Including amongst EX BRs: 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: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
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"> 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: angloamerican.com] Not met: Lessons learnt from checking effectiveness [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
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"> Met: Comms plan re identifying risks: The Company publicly describes and communicates, through the Social Way and the SEAT documents the process to identify and assess human rights risks. [SEAT Toolbox: angloamerican.com & Social Way] Met: Comms plan re assessing risks: The Company publicly describes and communicates, through the Social Way and the SEAT documents the process to identify and assess human rights risks. It also communicates through the sustainability report the salient issues (and describes how as part of the stakeholder engagement plan, this is communicated to local communities at operations). [SEAT Toolbox: angloamerican.com & Sustainability report, 2017: angloamerican.com] Not met: Comms plan re action plans for risks: The Company describes its global system to take actions to prevent, mitigate or remediate its salient human rights issues, however, no evidence found of examples of actions taken to tackle at least one of these. [Social Way & Response to Business & Human Rights Resource Centre, July 2018: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Comms plan re reviewing action plans: The Company describes the system for tracking the actions taken in response to human rights risks and impacts assessed and for evaluation whether the actions have been effective or have missed key issues or not produced the desired results. However, no evidence found of specific lessons learned while tracking how it has responded to at least one specific salient issue. [SEAT Toolbox: angloamerican.com] • Not met: Including EX BRs [SEAT Toolbox: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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'. [SEAT Toolbox: angloamerican.com] • 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: angloamerican.com]

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from 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"> • Met: Channel accessible to all workers: The Whistleblowing policy describes the speak up programme which is a 'confidential service for all employees, suppliers, business partners and stakeholders of Anglo American, including De Beers, to raise concerns about potentially unethical, unlawful or unsafe conduct and practices. It is independently managed on our behalf by an external service provider'. The Code of conduct, which contains human rights commitments, includes this mechanism to report. [Whistleblowing policy: speak-up-site.com & Speak up website: speak-up-site.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: In the Sustainability report the Company reports data about the practical operation, including the number of complaints that related to human rights, which were 20 in 2017. [Sustainability report, 2017: angloamerican.com] • Met: Channel is available in all appropriate languages: The Speak up website is available in English, Spanish, Portuguese, German, French and Chinese. The website also discloses specific phone numbers for the different countries in Africa, Asia-Pacific, Europe, North America and South America. In addition to the languages mentioned, contacts in business hours will be offered in 11 South African languages. [Speak up website: speak-up-site.com] • Met: Opens own system to EX BP workers: The Whistleblowing policy states that it is a 'confidential service for all employees, suppliers, business partners and stakeholders of Anglo American, including De Beers, to raise concerns about potentially unethical, unlawful or unsafe conduct practices'. [Whistleblowing policy: speak-up-site.com & Speak up website: speak-up-site.com]
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"> • Met: Grievance mechanism for community: The Company indicates that 'Speak Up facility is a confidential and secure means for our employees, contractors, suppliers, business partners and other external stakeholders around the world to report concerns about conduct that is contrary to our values and integrity standards'. The Social way document requires having site-based grievance mechanisms. The above, 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'

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>whistleblowing programme. [Whistleblowing policy: speak-up-site.com & Speak up website: speak-up-site.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Speak up website is available in English, Spanish, Portuguese, German, French and Chinese. The website also discloses specific phone numbers for the different countries in Africa, Asia-Pacific, Europe, North America and South America. In addition to the languages mentioned, contacts in business hours will be offered in 11 South African languages. <p>In addition to the speak up programme, 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. [Whistleblowing policy: speak-up-site.com & SEAT Toolbox: angloamerican.com]</p> <ul style="list-style-type: none"> • Met: EX BP communities use global system: See above [Whistleblowing policy: speak-up-site.com & SEAT Toolbox: angloamerican.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> • Not met: Engages users to create or assess system • Not met: Description of how they do this: The Company reports in the SEAT document an example of work carried out with local stakeholders to design a grievance procedure. However, this example refers to 2009. No additional evidence found in relation to engagement with potential or actual users on the design, implementation or performance of the channels/mechanisms, nor examples of doing so. [SEAT Toolbox: angloamerican.com & Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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"> • Met: Response timescales: In relation to procedures for managing complaints, the SEAT tool 4A indicates the following: 'it is critical that the complaints and grievance procedure is clearly communicated to stakeholders. A set of clear timeframes within which the complainant(s) can expect the complaint or grievance to be investigated and resolved should also be communicated [...] This timeframe needs to be practically feasible, whilst at the same time respecting the stakeholder's need for a response and resolution of the issue. It may therefore be useful to have a timeframe for an initial response and another for the resolution. Where there is a clear sense of urgency regarding a complaint or grievance, they will need to be resolved more quickly. In instances where the deadline cannot be met, an interim response should be provided (e.g. a "holding letter" explaining that there will be a delay, the reasons for this, and the revised date for resolution)'. [SEAT Toolbox: angloamerican.com] • Met: How complainants will be informed: In addition to the description mentioned above, the Social way indicates that procedures need to align with the UNGP effectiveness criteria, including communications of the procedures 'to affected communities and interested stakeholders in a culturally appropriate manner'. [SEAT Toolbox: angloamerican.com & Social Way] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The Sustainability report indicates that 'Our mandatory Group-wide complaints and grievances reporting procedure, which includes social incidents, is designed to ensure openness, accountability and respectfulness in our handling of stakeholder grievances. Level 3-5 (moderate to significant) social incidents are reported to the Board and included in chief executive's quarterly performance scorecard'. [Sustainability report, 2017: angloamerican.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	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"> • Met: Public statement prohibiting retaliation: The Business Integrity Policy states that 'Anglo American will not tolerate any form of retaliation against employees raising concerns in good faith. Allegations of retaliation against or harassment or intimidation of an employee by others as a result of a call to Speak up with be investigated and appropriate action taken, including disciplinary action up to and including dismissal of the employee responsible for reprisals'. The Whistleblowing policy enumerates different examples of what can be considered retaliation and also indicates that 'the equivalent protection, where relevant, is also extended to any external organisation represented by the whistleblower'. [Business integrity policy, 05/2014: angloamerican.com & Whistleblowing policy: speak-up-site.com] • Met: Practical measures to prevent retaliation: The mechanisms is operated by an independent service provider and the policy states that 'In terms of contractual arrangements with Anglo American, it is incumbent on the Service Provider to protect the identity of the whistleblower, including never revealing the person's identity to Anglo American without that person's consent'. In addition, allegations of retaliation may end up in disciplinary action, including dismissal of the employee responsible for reprisals. [Whistleblowing policy: speak-up-site.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects EX BRs to prohibit retaliation: As noted above, stakeholders are covered by the Company's system.
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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"> • Met: Won't impede state based mechanisms: The Company states in its Social Way document that 'managed sites shall ensure that procedures align with the UNGP effectiveness criteria, including: clear communication that the existence of the complaints and grievance mechanism does not preclude the right of the stakeholder to engage in judicial or other legitimate processes, in which Anglo American is committed to cooperate'. [Social Way & Whistleblowing policy: speak-up-site.com] • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
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"> • 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: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Pays living wages: The Company is an accredited Living Wage employers according to Living Wage Foundation. However, this initiative focused on UK operations only. [Living wage Foundation: livingwage.org.uk] • Not met: Reviews livings wages definition with unions

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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"> • Met: Member of EITI: The Sustainability report indicates that 'Anglo American has voluntarily provided information about our tax payments on a country-by-country basis for the past 12 years and we remain a supporter of the Extractive Industries Transparency Initiative (EITI), despite having no operational mines in countries that are implementing the EITI'. [Sustainability report, 2017: angloamerican.com & Tax and contribution report, 07/2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The Company publishes a Tax and economic contribution report covering total tax and economic contribution by country and by project. In this document the Company indicates that 'payments are included on a 100% basis regardless of the exact percentage of ownership by Anglo American'. [Sustainability report, 2017: angloamerican.com & Tax and contribution report, 07/2017: angloamerican.com]
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: CHRB has not identified any documents in the public domain which contain a commitment to not interfering with the right of workers to form or join trade unions and to bargain collectively and putting in place measures to prohibit retaliation against workers seeking to exercise these rights. However, it has a significant union recognition (beyond 60%), which is a proxy for not intimidating or retaliating. [Sustainability report, 2017: angloamerican.com] • Met: Discloses % covered by collective bargaining: The Sustainability report indicates that 'approximately 72% of our current permanent workforce is represented by works councils, trade unions or other similar bodies and covered by collective bargaining agreements' [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	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"> • Met: Injury Rate disclosures: Total recordable cases frequency rate for the last five years. [Sustainability report, 2017: angloamerican.com] • Met: Lost days or near miss disclosures: Lost time injuries for the last five years. [Sustainability report, 2017: angloamerican.com] • Met: Fatalities disclosures: Total fatal injuries and fatal injury frequency rate for the last five years. [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: Company's objectives include zero work-related fatal injuries, and 15% year-on-year reduction in total recordable cases of frequency rate. The Company has not achieved these targets. [Sustainability report, 2017: angloamerican.com] • Met: Met targets or explains why not: The Company indicates that 'failure to identify hazards and respect risks, not following standard operating procedures, and inadequate supervision and oversight, are routinely identified as contributing factors in significant and fatal incidents across the Group. Over the past two years, 90% of Group fatalities have occurred at our South African operations. Ensuring safety at South African mines is an ongoing issue across the industry. We continue to focus on further strengthening our safety culture and controls at more challenging mines'. [Sustainability report, 2017: angloamerican.com]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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"> • Met: Process to identify indigenous rights holders: The Social Way document states that the Company 'shall identify communities of Indigenous People that are potentially affected by our activities. Where the indigenous status of a people is not defined or is unclear, Anglo American shall refer to the definition contained in International Labour Organization Convention 169 and outlined in Section 1.3 of ICMM's Good Practice Guide: Indigenous Peoples and Mining. If further clarification is required, external expertise shall be commissioned'. It adds that it 'shall respect the rights, interests, special connections to lands and waters, and perspectives of Indigenous Peoples, where mining projects are to be located on lands traditionally owned by or under customary use of Indigenous Peoples'. [SEAT Toolbox: angloamerican.com & Social Way]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How engages with communities in assessment: The SEAT states that, during impact, risk and opportunity analysis links between indigenous peoples, culture, livelihoods and lifestyles must be taken into account. 'In new projects, risks and opportunities should be analysed as part of pre-development impact assessments. For existing operations, and particularly for older sites that did not undertake pre-development social impact assessments, indigenous groups should be consulted as a part of the SEAT process or as a stand-alone exercise'. The document also states that 'Sites must ensure ongoing interaction with local indigenous peoples. This does not necessarily need to be a separate exercise from the overall community /stakeholder engagement processes at the operation, but it must respect indigenous culture and norms. The level of engagement should be appropriate to the types of impacts the operation may have on the indigenous peoples' livelihoods, as well as cultural and traditional practices' <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to FPIC (or ICMM): The Company states it is committed to 'the 2013 ICMM Position Statement on Indigenous Peoples and Mining, which endorses the principle of Free, Prior and Informed Consent (FPIC). [Sustainability report, 2017: angloamerican.com & ICMM Commitment: icmm.com] • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	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"> • Not met: Approach to identification of land tenure rights holders: 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. [SEAT Toolbox: angloamerican.com] • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works: The Company disclosed its compensation framework in its Socio-Economic Assessment Toolbox, under the description of the tool 'Resettlement Planning and Implementation'. However, no evidence found in relation to how it plans to or provides compensation, including its valuation methods and how right holders are involved in new or on-going resettlements. [SEAT Toolbox: angloamerican.com] • Not met: Steps to meet IFC PS 5 in state deals: In its Social Way document, the Company indicates: 'Where resettlement is unavoidable, projects shall follow the IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement'. However, there is no further information about the steps taken to meet IFC PS 5 in state deals. [Social Way] • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	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"> • Met: How implements security (inc VPs or ICOC): The Company devotes a section of the SEAT to explain its approach to implement security following the Voluntary Principles on Security and Human Rights. [Social Way & SEAT Toolbox: angloamerican.com] • Met: Example of respecting HRs in security: See above. In addition, the Company publishes a specific annual report on the implementation of VPs [SEAT Toolbox: angloamerican.com & Annual report on the voluntary principles on security and human rights, 2017: angloamerican.com] • Met: Ensures Business Partners follow security approach: Social Way, which contains the Company's commitments on management social impacts, applies to the entire life cycle of the activities and are mandatory for contractors, sub-contractors and any other business partners under Anglo American management where it has been identified that the contracted activity as the potential to result in material social impacts. [Social Way] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assesses and involves communities: The document also indicates the following regarding local community: 'Each Anglo American operation should engage community concerns regarding security arrangements and human rights; and disclose, to the extent possible, the information of security arrangements'. [Social Way & SEAT Toolbox: angloamerican.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Working with local community: The Company publishes an annual report on the Voluntary Principles which contains examples of working with community members to prevent or address tensions related to its operations. [Annual report on the voluntary principles on security and human rights, 2017: angloamerican.com]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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"> • Met: Action to prevent water and sanitation risks: The Sustainability report describes some cases of water stewardship. They include the case of Platinum operations in South Africa, where 80% of the operations are located in water-scarce regions. It is implementing water-conservation initiatives and involved in partnerships 'to source water into the Northern and Eastern Limb platinum operations and communities. This has included collaboration with 30 organisations to provide bulk water services to mines and communities in the area'. Platinum unit is working in understanding water availability in the longer term and commissioned a water project in collaboration with the Department of Water Affairs and Sanitation to restate the regional water balances of catchments in Limpopo. 'The objective is to understand the water deficits and surpluses in order to undertake, in collaboration with other regional stakeholders, a conceptual source-water project to address shortfall'. [Sustainability report, 2017: angloamerican.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors: The Company is developing and implementing a new water-management standard and associated reporting requirements. It estimates that by the end of 2018 it will have a more consistent baseline of data with which to determine targets and water plans for each site. [Sustainability report, 2017: angloamerican.com] • Not met: Reports progress in meeting targets and shows trends in progress made [Sustainability report, 2017: angloamerican.com]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Access to water • Headline: Colombia's Constitutional Court decided to suspend Cerrejon's permit to divert stream over lack of consultations with local indigenous groups. • Sources: Colombia: Constitutional Court suspends Cerrejon's permit to divert stream over lack of consultations with local indigenous groups; incl. company statement - Business & Human Rights Centre - 21/08/2017 - business-humanrights.org • Allegation: Anglo American is a joint-venture partner (with BHP Billiton and Glencore) 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. <p>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.</p>
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"> • Not met: Public response available: Although the operating company for Cerrejón stated it respects the court's decision and will not work in the mining area towards the natural course until a definitive ruling is issued, CHRB could not find any public statement from Anglo American regarding its position. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
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"> • Met: Company policies address the general issues raised: With regards to water the Company states on its website: 'To maintain our licence 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 also states in its 'The Social Way' report: 'Through our social performance management, we seek to assist in addressing

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>previous disadvantage, to involve vulnerable and marginalised groups in decision-making and to support their empowerment through socio-economic development opportunities. This includes our recognition of the right of Indigenous Peoples to Free, Prior and Informed Consent (FPIC)'. However the Company has not published any document in which it states that it commits to respect the right to sanitation. Neither has it disclosed a public policy stating it requires its extractive business partners to commit to respect the rights to water and sanitation or to commit to respect the rights of indigenous peoples.</p> <ul style="list-style-type: none"> • Not met: Policies apply to the type of business relationships involved Score 2 • Not met: Policies address the specific rights in question
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.58 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Anglo American made data public that met one or more elements of the methodology in 34 cases, leading to a disclosure score of 3.58 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows: Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The sustainability report contains a GRI index. [Sustainability report, 2017: angloamerican.com]
F.3	Key, High Quality Disclosures	1.2 out of 4	<p>Anglo American met 3 of the 10 thresholds listed below and therefore gets 1.2 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, 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.