

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Anglo American  
**Sector** Extractives  
**Overall score** 41.4 out of 100

Theme score	Out of	For theme
5.0	10	A. Governance and Policy Commitments
11.4	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
12.5	25	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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 Policy Commitments (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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Human Rights policy states that: 'Anglo American has a strong commitment to human rights. Respect for human rights is stated explicitly in our Code of Conduct and is reflected in our core values of safety, care and respect, integrity, and accountability'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commitment to UNGPs: The policy also adds that: 'Our commitment to human rights is further expressed through our being a signatory to the United Nations Global Compact and the Voluntary Principles on Security and Human Rights (VPSHR), and through being a supporter of the UN Guiding Principles on Business and Human Rights (Guiding Principles)'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: The Human Rights policy states that : 'Our commitment to respect human rights includes recognition of all internationally recognised human rights, in particular [...] the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; and international humanitarian law, where applicable'. Also, see below the explicit commitment to each ILO core labour area. [Human Rights Policy version 3, 10/2021: <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: Explicitly lists all four ILO core principles: The Human Rights policy indicates: 'Our commitment to the International Labour Organisation's fundamental labour rights entails respect for the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero tolerance approach to forced and bonded labour, child labour and unfair discrimination'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to ILO core principles: See above. The Human rights policy also applies to business partners: 'This Policy applies to all stages of operational life cycles and to our relationships with our employees, contractors, and other public and private sector business partners in what they do on our behalf. In those situations where Anglo American does not have full management control, we will exercise our available leverage to influence compliance with this Policy'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for BPs/JVs: As above. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: The Code of Conduct indicates: 'Our operations are fundamentally safe, well-designed and well-maintained plants, equipment and infrastructure, with effective safety management systems. We rigorously comply with all applicable safety laws and regulations in addition to our own policies and requirements. We ensure that all our staff are appropriately trained and are competent to manage their own safety, the safety of their colleagues, and that safety standards are consistently applied across our operations'. Moreover, 'Our operations are fundamentally safe, healthy, well-designed and well maintained plants, equipment and infrastructure, with effective workplace health management systems. Providing workplace environments that are free of occupational health risks is a legal and moral imperative for us'. [Our code of conduct, 20/04/2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Company has provided comments to CHRB regarding this indicator regarding the specificity of its sector and working hours. However, no evidence was found of a commitment to respect ILO standards on working hours, which includes considerations for the extractive sector.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to H&amp;S of workers: The Responsible sourcing standards for suppliers indicates: 'Suppliers must protect the safety and health of their workforce: We work together to maintain a safe and healthy workplace [...]; Comply with all applicable legislation, regulations, by-laws and best practice guidelines [...]; Maintain a zero-tolerance approach to unsafe behaviour [...]; Conduct risk assessments and manage safety risks [...]; Ensure that employees are trained and issued with protective equipment [...]; Offer unrestricted access to water and sanitary facilities [...]; Manage infectious diseases [...]; Contribute to safety innovation and performance [...]; Accommodation (where provided) meets health and fire code requirements [...]'. [Responsible sourcing standards for suppliers, 01/06/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The Responsible sourcing standards for suppliers indicates: 'Maintain working hours which meet legal requirements and operate shifts under 12 hours. Working hours shall be the lower of ILO guidelines or National Legislation. In the absence of special written directives by the respective government ministry, this is limited to 40 hours per week, excluding overtime. Working hours, inclusive of overtime, shall not exceed 12 hours in any 24-hour period unless a written directive is provided by the respective government Ministry. A minimum of 24 consecutive hours of rest shall be provided within every 7-day period. [...] Overtime shall never be excessive, not be regular and remain voluntary. Evidence of voluntary overtime may be requested. Overtime shall always be compensated at the premium rate prescribed by legislation'. [Responsible sourcing standards for suppliers, 01/06/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land,	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>• Not Met: Commitment to respect land ownership/natural resources as in VGGT</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Group Social Way Policy indicates: 'We adopt an integrated and multi-disciplinary approach to identifying and managing social and human rights impacts and risks, seeking to align with the IFC Environmental and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	natural resources and indigenous peoples' rights (EX)		<p>Social Performance Standards 7 and the UNGPs'. It adds: 'Sites shall manage the use and development of land in a sustainable manner that minimises impacts on local communities'. However, 'seeking to align with' is not considered a formal statement of commitment according to CHRB wording criteria. No additional policy statements found referring to IFC Performance Standards. The Company has provided additional comments to CHRB regarding this indicator, no further evidence found. [Group Social Way Policy V.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Code of Conduct indicates: 'We respect the rights, interests and perspectives of Indigenous Peoples, and take into account their unique and special connections to land, water and other natural resources'. [Our code of conduct, 20/04/2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Expects EX BPs to make these commitments: The Social Way Policy indicates: 'Sites shall respect the rights, interests and perspectives of Indigenous Peoples, and take into account their unique and special connections to land, water and other natural resources'. Also, 'We adopt an integrated and multi-disciplinary approach to identifying and managing social and human rights impacts and risks, seeking to align with the IFC Environmental and Social Performance Standards 7 and the UNGPs'. It adds: 'Sites shall manage the use and development of land in a sustainable manner that minimises impacts on local communities'. The Social Way Policy 'applies to our contractors, suppliers and other parties in relation to the activities they conduct on our behalf at our sites and such parties should be required to adhere to it'. However, it is not clear it expects suppliers to commit to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure (VGGT) or the IFC Performance Standards. [Social Way Policy v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>] &amp; [Supplier sustainable development code, N/A: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Social Way Policy indicates: 'We apply a process of informed consultation and participation with potentially affected stakeholders. When engaging with Indigenous Peoples, we apply the principles of Free, Prior and Informed Consent in accordance with the International Council on Mining and Metal's (ICMM) Position Statement5 and Good Practice Guide 6 on Indigenous Peoples and Mining'. [Social Way Policy v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> <li>• Met: Commitment to respect the right to water: The Water Policy indicates: 'Water is a fundamental requirement for our operations and future development, as it is to the communities in which we operate. We must therefore recognize our role and responsibility in water by making informed, sustainable and value protecting decisions as a business and stakeholder'. One of the Policy's fundamental principles states the following: 'recognizing water as an environmental and human right whilst identifying, developing and implementing collaborative solutions with our stakeholders'. [Group water policy 2018, 3/7/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Expects EX BPs to make these commitments: The water policy 'applies to all employees and directors, as well as contractors, consultants and external advisers (and their personnel) when they are acting on behalf of the Group'. The Social Way Policy indicates: 'We apply a process of informed consultation and participation with potentially affected stakeholders. When engaging with Indigenous Peoples, we apply the principles of Free, Prior and Informed Consent in accordance with the International Council on Mining and Metal's (ICMM) Position Statement5 and Good Practice Guide 6 on Indigenous Peoples and Mining'. The Social Way Policy 'applies to our contractors, suppliers and other parties in relation to the activities they conduct on our behalf at our sites and such parties should be required to adhere to it'. [Group water policy 2018, 3/7/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>] &amp; [Social Way Policy v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	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: Commitment to Voluntary Principles on Security and HRs: The Human Rights Policy indicates: 'Our commitment to human rights is further expressed through our being a signatory to the United Nations Global Compact and the Voluntary Principles on Security and Human Rights (VPSHR)'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Uses only ICoCA members as security providers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Commits to International Humanitarian Law: The Human Rights Policy indicates: 'Our commitment to respect human rights includes recognition of all internationally recognised human rights, in particular: [...] international humanitarian law, where applicable'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Expects EX BPs to commit to these rights: See above. The Human Rights Policy adds: 'This Policy applies to all stages of operational life cycles and to our relationships with our employees, contractors, and other public and private sector business partners in what they do on our behalf. In those situations where Anglo American does not have full management control, we will exercise our available leverage to influence compliance with this Policy'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.1.4	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commitment to remedy adverse HRs impacts: The Human Rights Policy indicates: 'Where we have caused or contributed to adverse human rights impacts, we contribute to their remediation as appropriate'. The Social Way Policy adds: '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 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Social Way Policy v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> <li>• Met: Expects EX BPs to make this commitments: See above. The Human Rights Policy states: 'This Policy applies to all stages of operational life cycles and to our relationships with our employees, contractors, and other public and private sector business partners in what they do on our behalf. In those situations where Anglo American does not have full management control, we will exercise our available leverage to influence compliance with this Policy'. The Social Way Policy indicates: 'The Social Way Policy applies to our contractors, suppliers and other parties in relation to the activities they conduct on our behalf at our sites and such parties should be required to adhere to it'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Social Way Policy v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Company has provided comments to CHRB regarding this indicator, however, no explicit policy statement committing it to collaborating with judicial or non-judicial mechanisms to provide access to remedy found. [Social Way Policy v.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> <li>• Not Met: Commitment to work with EX BPs on remedy: The Company has provided comments to CHRB regarding this indicator, however, no commitment to work with extractive business partners to remedy adverse impacts which are directly linked to the Company's operations, products or services found.</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs: The Human Rights policy indicates that 'Civic freedoms and the rule of law are important to the functioning of our business and wellbeing of our stakeholders. Human rights defenders play a crucial role in protecting civic freedoms and human rights. We recognise our duty to respect human rights defenders and commit to working with partners to promote civic freedoms and the rule of law'. The Code of Conduct adds: 'We further emphasise our commitment to civic freedoms and the rule of law, including respecting the rights of human rights defenders'. However, this subindicator looks for a policy statement where it explicitly commits to not tolerate threats or attacks against Human Rights Defenders. In addition, the Sustainability report states that 'Having signed the Public Statement on Supporting Civic Freedoms, Human Rights Defenders and the Rule of Law in 2019, in 2021, we prepared a new protocol for the protection of human rights defenders. We also updated our internal policies governing human rights to reflect our commitment to civic freedoms and human rights defenders and to align with the 'three lines of defence' risk management approach'. However, as indicated above, this looks for a public policy statement. CHRB does not consider the initiative "Public Statement on Supporting Civic Freedoms, Human Rights Defenders and the rule of law" a proxy for this indicator. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [2021 Sustainability report, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Expects BPs to make this commitment: See above. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

## A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: Board level responsibility for HRs: The Sustainability Committee, a Board committee 'provide[s] specific oversight of risks and opportunities in the following areas: [...] Social impact management and socio-economic development – including relationships with communities, community development, human rights, resettlement, housing and indigenous peoples; [...] Supply Chain – specifically local and inclusive procurement, supplier assurance and the impact of procurement decisions on human health and the environment'. [Sustainability Committee Terms of Reference, N/A: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>Not Met: Describes HRs expertise of Board member: The 2021 Integrated annual report discloses information on the Board of Directors' background experience and skills. Elizabeth Brinton has 'experience of developing clean energy strategies aligned with climate change reduction'. Tony O'Neill 'has responsibility for the Technical and Sustainability function'. However, this subindicator looks for a description of the human rights expertise of the Board member(s) tasked with that governance oversight. No further evidence found. [2021 Integrated annual report, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Board member/CEO signal importance of HRs in their communications: The Code of Conduct is signed by the Chief Executive, who is also accountable for the implementation of the Human Rights Policy. However, no communication found where Board members or the CEO clearly signal the Company's commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [Our code of conduct, 20/04/2022: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The Sustainability Committee – Terms of Reference indicates the committee's duties, including: 'Safety – the attainment of zero harm in our operations and for those affected by our operations; Health and wellbeing – including occupational hygiene, community health, and the health and wellbeing of our employees and contractors; [...] Social impact management and socio-economic development – including relationships with communities, community development, human rights, resettlement, housing and indigenous peoples; [...] Supply Chain – specifically local and inclusive procurement, supplier assurance and the impact of procurement decisions on human health and the environment'. The 2021 Sustainability Report indicates: 'The Sustainability Committee holds accountability for overseeing how Anglo American manages its most material sustainability issues. The committee meets four times a year'. See below further detail. [Sustainability Committee Terms of Reference Update October 2019, 24/10/2019: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [2021 Sustainability report, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>Met: Example of HRs issues/trends discussed in last reporting period: Regarding the Sustainability Committee, the 2021 Integrated Annual Report indicates: 'The Committee met four times in 2021 [...]. At each meeting, the Committee reviews detailed reports covering the Group's performance across a range of sustainability areas, including: safety; health and wellness; socio-political trends; human rights; climate change; and environmental and social performance. Significant social, safety, health and environmental incidents are reviewed at each meeting, as are the results from operational risk reviews and operational risk assurance audit observations'. [2021 Integrated annual report, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Meets both requirements under score 1</li> <li>Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The 2021 Integrated Annual Report notes: 'Healthy stakeholder relationships help us to better communicate how our business decisions, activities and performance are likely to affect or be of significant interest to our stakeholders, and provide the opportunity to co-create effective and lasting solutions to business and other challenges'. However, no description found of how the experiences of affected stakeholders or external human rights experts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			informed board discussions on human rights. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a> ]
A.2.3	Incentives and performance management	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: At least one board member incentive linked to HRs commitments: The 2021 Integrated Annual Report indicates that for 2021 '50% of each executive director's bonus outcome was assessed against financial targets. [...] 20% was assessed on Safety, Health and Environment (SHE) measures [...]. Strategic and SHE objectives are shared by the executive directors [...]'. The CEO is a Board member. The key Long Term Incentive Plan (LTIP) performance metrics for 2022 includes Safety and zero harm [15%]; water efficiency [5%]; Water reduction [8%]; Social responsibility [6%]. See below further details on specific KPI. Duncan Wanblad [Chief Executive] and Stephen Pearce [Finance Director] are Board members. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: See above. It includes health and safety metrics as well as water efficiency and water reduction incentives. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: See above. Moreover, it describes the metric, achievement and the specific weighting of each metric related to its SHE performance goals [2021]. The metric includes: 'Total recordable case frequency rate (TRCFR) – improvement of 15% on prior three-year Group average', for instance. The weighting for this metric is 5%. As for the key performance metrics for 2022 include: 'Employee safety is the Group's first and most important value' [15%]; 'Achieve enhanced water efficiency' [5%]; 'Reduction of freshwater abstraction in water-stressed areas to reduce our environmental burden in the areas where we operate' [8%]; Off-site jobs supported at our locations to reinforce our commitment to the communities in which we operate [6%]. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies: The Company has provided comments to CHRB regarding this indicator, however, it is not clear it has reviewed other Board performance incentives to ensure coherence with its human rights policy commitment.</li> </ul>
A.2.4	Business model strategy and risks	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>• Not Met: Board process to review business model and strategy for HRs risks: The 2021 Integrated Annual Report notes: 'Identifying and evaluating matters that are of common material interest to our stakeholders and to our business, and understanding how they may affect our ability to create value over time, are integral to our planning processes and help support the delivery of Anglo American's strategy'. It further explains how its materiality process works. It also discloses matters identified as material to stakeholders and its business, which include human rights. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Describes frequency and triggers for reviewing business model: The Company has provided comments to CHRB regarding this indicator regarding its materiality process and stakeholder engagement. However, this subindicator looks for a description of the frequency of and triggers for reviewing, at board level, its business model or strategy due to impacts on human rights. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews: The Company has provided comments to CHRB regarding this indicator indicating key decisions made in 2021, which include: Exit from thermal coal operations; Increasing our decarbonisation ambitions; Attractive shareholder returns and Chief executive succession. However, no example found of an action taken as a result of a discussion and review of its business model and strategy for inherent risks to human rights at Board level or a Board committee. The Company is expected to provide an example that reflects a change in organisation structure because of specific human rights inherent risk. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul>

## 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	1.5	<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: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The 2021 Sustainability Report indicates: 'The Board delegates executive responsibilities to the chief executive, who is advised and supported by the Group Management Committee (GMC). This committee comprises the chief executive, business unit CEOs, Group directors of corporate functions, and the Group general counsel and company secretary. 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 and sustainable impact'. [2021 Sustainability report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: The Human rights policy indicates that 'the parties responsible for ensuring, and overseeing, compliance with this Policy are as follows: Business Units and Group Functions are responsible for ensuring compliance with this Policy; The International, Government and Sustainability Relations, Social Performance and Group Legal teams are responsible for providing complementary expertise, support, monitoring, and challenge relating to compliance with this Policy; Internal Audit are responsible for providing independent assurance on the adequacy and effectiveness of the Policy controls in meeting the Policy objectives. [Human Rights Policy version 3, 10/2021: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own operations: See above. In addition, the Group Social Way Policy indicates: '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 and 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 Policy v.3.0, 01/01/2020: <a href="https://www.socialway.angloamerican.com">socialway.angloamerican.com</a>]</li> <li>• Not Met: Resources and expertise allocation with EX BPs</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: The 2021 Integrated Annual Report indicates that for 2021 '50% of each executive director's bonus outcome was assessed against financial targets. [...] 20% was assessed on Safety, Health and Environment (SHE) measures [...]. Strategic and SHE objectives are shared by the executive directors [...]'. The CEO is a Board member. The key Long Term Incentive Plan (LTIP) performance metrics for 2022 includes Safety and zero harm [15%]; water efficiency [5%]; Water reduction [8%]; Social responsibility [6%]. See below further details on specific KPI. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: See above. It includes health and safety metrics as well as water efficiency and water reduction incentives. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: See above. Moreover, it describes the metric, achievement and the specific weighting of each metric related to its SHE performance goals [2021]. The metric includes: 'Total recordable case frequency rate (TRCFR) – improvement of 15% on prior three-year Group average', for instance. The weighting for this metric is 5%. As for the key performance metrics for 2022 include: 'Employee safety is the Group's first and most important value' [15%]; 'Achieve enhanced water efficiency' [5%]; 'Reduction of freshwater abstraction in water-stressed areas to reduce our environmental burden in the areas where we operate' [8%]; Off-site jobs supported at our locations to reinforce</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>our commitment to the communities in which we operate [6%]. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies: The Company has provided comments to CHRB regarding this indicator, however, it is not clear it has reviewed other Senior management performance incentives to ensure coherence with its human rights policy commitment.</li> </ul>
B.1.3	Integration with enterprise risk 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"> <li>• Met: HRs risks integrated as part of enterprise risk system: The 2021 Integrated Annual Report indicates its principal risks. It includes: 'Safety - Failure to eliminate fatalities'. Also: 'Community and social relations Failure to maintain healthy relationships with local communities and society at large'. Regarding the latter risk, it adds that the root cause is: 'Failure to identify, understand and respond to community and societal needs and expectations'. It expands on its impacts: 'breakdown in trust with local communities and society at large threatens Anglo American's 'licence to operate', potentially leading to increased costs, future growth being impacted, business interruption and reputational damage'. And finally on its mitigation actions: 'The Anglo American Social Way is our integrated management system for social performance, adopted and implemented at all managed sites'. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>] &amp; [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="https://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party: The 2020 Modern Slavery Statement indicates: 'In 2018, an independent Group-wide review of our human rights framework was completed. The purpose of the review was to determine how aligned our human rights framework was to good practice. The exercise included a review of policies and procedures in place across the Group, extensive consultation with internal and external stakeholders, and an in-depth analysis of supply chain management and site level due diligence. As a result, the Group revisited the categorisation of salient human rights risks'. However, the methodology requires a description of how it assessed the adequacy of the enterprise risk management system in managing human rights during the Company's last reporting year. [Australia Modern Slavery Statement 2020, 14/06/2021: <a href="https://modernslaveryregister.gov.au">modernslaveryregister.gov.au</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: The 2022 Sustainability Report indicates: 'We continued to support the embedding of the Group's policies across the business units and Group Functions responsible for their implementation [...]. We regularly communicate our Values to our employees and provide training on the Code of Conduct and underpinning Group policies'. The Code contains the Company's Human Rights commitments and it is translated into five languages. However, it is not the clear if the Code is communicated in local languages and no further information found on the training programme, including whether it covers all employees. The 2021 Sustainability Report notes: 'We developed and launched several new training processes and materials, including conducting virtual Code of Conduct training for more than 13,000 participants. We also continued to innovate to make our training methods more engaging and impactful – introducing gaming methods and developing animated materials. For face-to-face training, we introduced more customised content using real-world case studies'. Although local languages are assumed in training, it is not clear '13,000 participants' means that all its workers receive the communication of its policy commitments, since the Company seems to have over 100.000 employees. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>] &amp; [2021 Sustainability report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders: The Human Rights Policy indicates: 'Anglo American communicates this Policy and its requirements to internal and external stakeholders, including general awareness raising and specific training on human rights-related issues, where deemed necessary'. However, although the Company indicates it communicates this policy to stakeholders, no further description found of how it communicates it to affected stakeholders, including local communities. [Human Rights Policy version 3, 10/2021: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to EX BPs: The Responsible sourcing standards for suppliers indicates: ‘Every supplier to our business is required to comply with relevant laws and commit to Anglo American’s Responsible Sourcing requirements as a precondition to supply. These requirements are also in our contract templates and purchase order conditions’.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The Responsible sourcing standards for suppliers indicates: ‘Every supplier to our business is required to comply with relevant laws and commit to Anglo American’s Responsible Sourcing requirements as a precondition to supply. These requirements are also in our contract templates and purchase order conditions’.</li> </ul> <p>[Responsible sourcing standards for suppliers, 01/06/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The Company has provided comments to CHRB regarding this indicator, however, no evidence found it requires to cascade the contractual or other binding requirements down their supply chain (independent extractive business partners).</li> </ul>
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"> <li>• Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments: The Human Rights Policy indicates: ‘Anglo American communicates this Policy and its requirements to internal and external stakeholders, including general awareness raising and specific training on human rights-related issues, where deemed necessary’. The 2022 Sustainability Report indicates: ‘We continued to support the embedding of the Group’s policies across the business units and Group Functions responsible for their implementation [...]. We regularly communicate our Values to our employees and provide training on the Code of Conduct and underpinning Group policies’. The Code contains the Company’s Human Rights commitments. The 2021 Modern Slavery Statement adds that it carries out modern slavery training. However, no further description of the training or of the content of the training found. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [2021 Modern Slavery Statement, 06/2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Trains relevant managers including security on HRs: The 2021 Annual report for the Voluntary Principles on Security and Human Rights indicates: ‘The Social Way states training in human rights and the VPs is essential for private security contractors. Training is currently provided by sites to employees, private security personnel and, in some cases, public security personnel’. It then provides information on specific site training and figures on personnel trained in each place. It adds: ‘A total of 5,842 personnel (comprising employees, and private and public security personnel) participated in our security and human rights training courses’. [Annual report for the Voluntary Principles on Security and Human Rights 2021, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains BPs to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	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: Score of at least 1 on A.1.2.a</li> <li>• Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The 2021 Modern Slavery Statement indicates: ‘Our Human Rights Policy is also embedded in the Social Way Management System (Policy, Toolkit, and Assurance Framework), which supports its implementation across the Group’. The Group Social Way Policy states: ‘This Policy is supported by the Social Way Toolkit and the Social Way Assurance Framework. Together, they form the Social Way Management System. [...] The Social Way Assurance Framework is an internal guideline and outlines the requirements and processes through which sites are to be assessed for compliance with the Social Way Policy’. The Social Way Toolbox indicates: ‘The Social Way Assurance Framework is not publicly disclosed. It contains the requirements, criteria and process through which Anglo American sites are assessed on their compliance with the Social Way Policy. All sites are assessed on an annual basis by external, independent assessors. Based on the outcomes of the assurance process, site-level improvement plans, supported by ongoing training and capacity building, are developed for continuous improvement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and learning'. As for its extractive business partners, the Supplier Sustainable Development Code indicates: 'Anglo American may conduct site visits and audits by Anglo American managers/auditors or third-party managers/auditors nominated by Anglo American to verify compliance with this Code. Therefore, we expect our suppliers to allow Anglo American staff or a third-party auditor appointed by Anglo American to audit operations and be allowed access to relevant documentation, premises and workers'. The Responsible sourcing standards for suppliers FAQ adds: 'Suppliers are to complete a self-assessment questionnaire (SAQ), including making updates to the information provided. The SAQ is typically required during supplier registration, qualification, updates and sourcing events. [...] We recommend that suppliers regularly review the SAQ and make updates if there are changes in your business. We will require suppliers to review the SAQ at minimum every 36 months, we may however request a more frequent update should more information be required'. [2021 Modern Slavery Statement, 06/2022: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Group Social Way Policy V.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses % of EX BP's monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process: The Social Way Toolbox indicates: 'Corrective action is taken as needed based on results of ongoing monitoring and evaluation. Feedback on outcomes of social and human rights impact mitigation, and progress towards meetings long-term objectives is reported internally and externally'. The Responsible sourcing standards for suppliers FAQ adds: 'Where Responsible Sourcing risk has been identified - including any breaches to the Standard - suppliers are required to inform Anglo American, develop corrective action plans with realistic timelines to address them and provide feedback on progress'. However, no details found in relation to the actual corrective action process following non-compliances found. [Group Social Way Policy V.3.0, 01/01/2020: <a href="http://socialway.angloamerican.com">socialway.angloamerican.com</a>] &amp; [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
B.1.7	Engaging and terminating business relationships	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>• Not Met: HRs performance affects selection EX BPs: The 2021 Sustainability Report indicates: 'As a condition of working with our business, suppliers must comply at a minimum with all relevant laws and industry regulations. We also expect them to meet Anglo American's policies, site requirements and other supply conditions, including our Responsible Sourcing Standard'. However, it is not clear how human rights performance is considered when choosing their suppliers, not after the decision was made and then suppliers have to agree to comply with certain expectations. This datapoint focuses on the selection process. [2021 Sustainability report, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: HRs performance affects ongoing BPs relationships: Regarding non-conformance to the Supplier Sustainable Development Code, it indicates: 'Where elements of this Code are not met, the supplier may be required to prepare, document and implement a corrective action plan to amend the situation and prevent the recurrence. In case of non-compliance, Anglo American may collaborate with or assist suppliers to become compliant. Anglo American reserves the right to disengage from suppliers who fail to comply with this Code'. The Code contains the Company's Human Rights expectations. [Supplier sustainable development code, N/A: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with EX BPs to meet HRs requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	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 workers and communities identified and engaged in the last two years: The Social Way Tool Box indicates: 'The scope of stakeholder engagement is primarily defined by impacts rather than proximity. Sites have a responsibility to identify and engage. [...] Stakeholder analysis is a process of gathering and studying information about stakeholders to determine with whom to engage, about what, with what level of intensity, and with what frequency. It helps determine who to prioritise for engagement and which stakeholders require a tailored engagement approach e.g. vulnerable groups or those with high levels of influence. One of the aims of stakeholder analysis is to understand people's</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>underlying motivations and analyse the root causes of stakeholder concerns or aspirations (though the cause does not alter the level of importance of the issue). Individuals have a variety of motivations for engaging with a site, ranging from wanting the best for their community through to a desire for personal or group gain. Understanding these motivations supports the design of relevant and effective engagement approaches'. The Company provides an example of a mapping matrix, according to impact rating and influence/interest rating: 'Sites can use this technique to map all stakeholders or 'zoom in' to produce separate maps for stakeholder sub-groups or specific issues/activities'. Regarding stakeholder engagements, the 2022 Sustainability Report adds: 'In 2022, we had two dialogue sessions with IndustriALL Global Union. In South Africa, our Tripartite structure (comprising South African businesses, recognised trade unions, the Department of Mineral and Energy Resources and industry councils) met to continue its focus on a number of topics important to our employees'. Moreover, 'In 2022, land access, displacement and resettlement processes were applicable to 13 of our managed sites – these processes were assessed against the Social Way 3.0 requirements as part of the annual third-party Social Way 3.0 assurance process. Our long term approach to potential future resettlement projects prioritises design alternatives to avoid or minimise these potential future impacts'. Although the Company does not mention engagement during displacement and resettlement processes, the Social Way 3.0 [Social Way Tool Box] indicates: 'guidance provided on stakeholder engagement must be adopted when designing and conducting resettlement-specific engagement. Resettlement-specific engagement must be aligned with the site's Stakeholder Engagement Plan (SEP)'. [Social Way Policy v.3.0, 01/01/2020: <a href="https://socialway.angloamerican.com">socialway.angloamerican.com</a>] &amp; [2022 Sustainability Report, 03/03/2023: <a href="https://angloamerican.com">angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Provides two examples of engagement with stakeholders: As indicated above: 'In 2022, we had two dialogue sessions with IndustriALL Global Union. In South Africa, our Tripartite structure (comprising South African businesses, recognised trade unions, the Department of Mineral and Energy Resources and industry councils) met to continue its focus on a number of topics important to our employees'.</li> </ul> <p>The Company further states that 'In Canada, where our operations affect Indigenous Peoples, we work with the relevant authorities to reach Impact and Benefit Agreements (IBAs). At our Metallurgical Coal operations in Australia, we have established cultural heritage management agreements with the traditional owners of the lands in which we operate. Developed through engagement with traditional owners, our revised Reconciliation Action Plan is a framework for Anglo American to support the national reconciliation movement and to contribute to achieving reconciliation internally and in the communities in which Anglo American operates.' [2022 Sustainability Report, 03/03/2023: <a href="https://angloamerican.com">angloamerican.com</a>] &amp; [2021 Sustainability report, 2022: <a href="https://angloamerican.com">angloamerican.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying 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: Describes process of identifying risks in own operations: The Social Way Toolbox indicates: 'SHIRA [Social and Human Rights Impact and Risk Analysis] is an integrated, comprehensive process for identifying, preventing and addressing potential negative impacts on external stakeholders, and risks to the business. SHIRA is guided by the mitigation hierarchy of avoiding, minimising, mitigating, remediating and offsetting/compensating, and by the hierarchy of controls of elimination, substitution, engineering, separation, administration, and PPE. [...]</li> </ul> <p>SHIRA is a requirement at every stage of the asset lifecycle. Across the lifecycle, potential social and human rights risks and impacts are ever-changing, with some impacts specific to the point in the lifecycle'. It includes, among other steps: Review context, Understand stakeholder perspectives, Conduct SHIRA as part of the Operational Risk Management process, Identify the category. The 2021 Modern Slavery Statement indicates: 'Social Way 3.0, requires all sites to conduct a social and human rights impact and risk analysis (SHIRA) on an annual basis throughout the life of an asset'. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="https://staticcontents.investis.com">staticcontents.investis.com</a>] &amp; [2021 Modern Slavery Statement, 06/2022: <a href="https://angloamerican.com">angloamerican.com</a>]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describes process for identifying risks in EX BPs: The Group Social Way Policy indicates: 'All sites shall conduct a Social and Human Rights Impact and Risk Analysis (SHIRA) on an annual basis throughout the Life of Asset and in accordance with the requirements of the Anglo American Integrated Risk Management Policy and the Anglo American Operational Risk Standard. All adverse impacts and risks shall be identified, documented and prioritised [...]'. The Social Way Policy 'applies to our contractors, suppliers and other parties in relation to the activities they conduct on our behalf at our sites and such parties should be required to adhere to it'. The 2022 Sustainability Report indicates: 'All suppliers are expected to commit to responsible business practices and complete self-assessment questionnaires'. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: See above. Moreover, 'Identification of potential impacts and risks is a primary function of stakeholder engagement. Sites can only fully understand their actual or potential impacts through engagement. In turn, stakeholders can only assess the likely effect of impacts and help define prevention and mitigation measures if they are informed of, and consulted on, site activities and plans. Identifying stakeholders and issues that present risks or opportunities to the site itself must also be informed by engagement. Stakeholder engagement is intertwined with the annual, as well as issue-specific Management Plans. [...] Impact and Risk Prevention and Management) provide a guide to identifying which stakeholders need to be engaged and on what topics. [...] Impact and Risk Prevention and Management) provide a guide to identifying which stakeholders need to be engaged and on what topics'. However, it is not clear how internal or external Human Rights expects are involved in its global system'.</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances: The Social Way Toolbox indicates: 'For activities related to a site, e.g. a new project or site expansion, an HIA [Health Impact Assessment] may be commissioned and integrated as part of environmental and social impact assessment (ESIA) work'. However, it is not clear how these systems are triggered by new country operations, new human rights challenges or conflict affecting particular locations. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing 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: Describes assessment process and discloses salient HRs risks: The 2022 Sustainability Report indicates: 'Due diligence is central to Anglo American's approach to human rights. As part of the ongoing process to identify and manage key human rights risks, we have integrated due diligence into existing standards that apply to our critical risks and, increasingly, business activities that cut across several risk areas'. The Social Way Toolbox adds: 'The core of the Social Way is the identification, assessment and management of social and human rights impacts and risks as part of a site's ongoing operational risk management process. This requires the following: [...] An analysis of systemic and site-induced vulnerability'. It then adds it has a Social Consequence Matrix which 'provides guidance for identifying the significance rating for Vulnerability and intends to capture how vulnerable, or resilient, those impacted are in relation to the specific impact. [...] Some individuals or groups might be more vulnerable, or less resilient, to a certain impact than others'. It discloses some examples of it. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Describes how process applies to EX BPs: It is not clear it also applies to extractive business partners.</li> <li>• Met: Public disclosure of results of HRs risk assessment: In the Context of explaining its human rights due diligence, the Company reports that 'Our most salient human rights risks relate to occupational health and safety, the environment, labour, communities, security and human rights, and our supply chain. While these risks have the potential to affect human rights, a key element of managing these risks is through our compliance with relevant legislation. Accounts of our approach and performance in relation to these salient risks are covered in applicable sections of this report. Human rights risks that are not addressed comprehensively under these topics are included in this section'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: The Social Way Toolbox indicates: ‘The mitigation of potential social and human rights impacts and risks may include the development and implementation of socio-economic development (SED) projects. [...] While SED programming is not exclusively based on risk and impact mitigation, in many cases the most effective risk- and impact-mitigation measures entail long-term development support and capacity-building. SED programmes should therefore be informed by an analysis of potential social and human rights impacts and risks. [...] SHIRA is guided by the mitigation hierarchy of avoiding, minimising, mitigating, remediating and offsetting/compensating, and by the hierarchy of controls of elimination, substitution, engineering, separation, administration, and PPE. [...] Adverse impacts on vulnerable groups require different and/or additional controls. In terms of both prevention and mitigation of adverse impacts, sites may also need to initiate additional, targeted and long-term measures to address both the causes and consequences of vulnerability. In the event that some people are vulnerable to the impact and others are not, sites should provide two different consequence levels and two different sets of mitigation measures (i.e. for those vulnerable to the impact, and for those not vulnerable to it)’. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Describes how global system applies to EX BPs: Regarding business partners, the Company contains a table that ‘provides an overview of typical contractor-related risks and impacts’. It contains: Impact and risk category, Examples of potential impacts, Description of potential impact, Contracts and scopes of work typically associated with potential impact. However, it is not clear its global system to prevent, mitigate or remediate its salient human rights issues also apply to its extractive business partners. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: The 2022 Sustainability Report indicates the Living with Dignity framework was created ‘to tackle gender-based violence (GBV) that we launched at the end of 2019. [...] Living with Dignity represents a call to action for all parts of the business to work towards a mining ecosystem that is free from harm and supports dignity and equality. The launch of the Living with Dignity Hub in South Africa is a recent example of how we are investing in providing employees and contractors experiencing harm at home or at work with an additional and independent way of accessing support. [...] On the community front, our work on tackling GBV focuses largely on gender mainstreaming, starting with a full review of our core policies and processes to ensure they deliver positive outcomes for women and other vulnerable groups. This process includes integrating requirements that protect the vulnerable groups we work with in communities against sexual exploitation and abuse. Outside of our work on gender mainstreaming, we launched two major projects in 2022. First, we were a founding member of the Minerals Council of South Africa partnership with the National Prosecuting Authority and the National GBVF Response Fund. The partnership supports a collaborative approach between mining companies and the aforementioned entities to strengthen GBV response measures in mining communities through ‘one stop centres’ called Thuthuzela Care Centres. These centres offer victims – in most cases women and children – medical, psycho-social and legal support and increase significantly the likelihood of successful conviction of perpetrators. The second project is a national campaign to ensure that survivors of rape have better access to care and justice. The project is a collaboration between Anglo American and several partners – Rape Crisis, Mosaic, the Institute of Security Studies’. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Met: Describes how stakeholders involved in decisions about actions taken: The Social Way Toolbox indicates: ‘Potentially affected stakeholders should have the opportunity to inform potential impact identification and mitigation. This happens through a site’s Stakeholder Engagement processes [...] and Social Incident and Grievance Mechanisms’. Both mechanisms are detailed in the Toolbox. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking the effectiveness of actions to respond to 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: Describes system for evaluation effectiveness of actions: In the context of its SHIRA, the Social Way Toolbox indicates how it monitors and evaluates: 'The implementation of Controls should be monitored, and their effectiveness should be evaluated so that corrective action can be taken where needed. To monitor and evaluate controls, appropriate key performance indicators (KPIs) should be developed, which should be recorded and tracked in the Social Way Monitoring and Evaluation Framework. [The table] below provides an indicative example of what might be included. Monitoring of progress in implementing Controls, achieving outputs and outcomes and evaluation of whether the target has been achieved should be undertaken on a regular basis. Monitoring helps ensure that the implementation of Controls is on track and that the Controls are having the desired effect. Modifications of Controls can be made as needed, based on monitoring and evaluation data'. The table includes: Potential Impact, Control, Target, Control Owner, Timeline, Inputs and Implementation Check. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Met: Involves stakeholders in evaluation effectiveness of actions: Regarding Stakeholder participation in control evaluation and participatory monitoring, the Social Way Toolbox indicates: 'Engagement should also include an evaluation of the effectiveness of Controls, taking into account that certain information may be too sensitive to share externally. The extent to which affected stakeholders feel that impact management measures are both appropriate and effective is important. Stakeholder participation in evaluation should happen both informally (e.g. in the course of ongoing consultations as part of sites' stakeholder engagement processes) and formally, for example, through structured discussions at meetings of the CEF [...]. Participatory monitoring [...] is not a requirement in respect of all potential impacts. It is a requirement in certain cases; for example, with respect to impacts on Indigenous Peoples and where physical and/or economic displacement of local communities is unavoidable. It is also recommended in instances where potential impacts are likely to prove contentious with local stakeholders, or where these pertain to PUEs'. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul>
B.2.5	Communicating on human rights impacts	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>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

## C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for 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: Grievance mechanism accessible to all workers: The 2022 Sustainability Report indicates: 'To ensure accountability, our Your Voice confidential reporting service empowers employees, contractors, suppliers and other stakeholders to raise concerns anonymously about potentially unethical, unlawful or unsafe conduct or practices that conflict with our Values and Code of Conduct. YourVoice is operated by an independent multilingual whistleblowing service provider'. The Whistleblowing Policy discloses the different channels available, including the 'YourVoice web platform'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Group Whistleblowing Policy, 16/11/2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism available in appropriate languages and workers made aware: The webpage section Your Voice is available in multiple languages. The 2022 Sustainability Report indicates: 'We regularly communicate our Values to our employees and provide training on the Code of Conduct and underpinning Group policies'. The Code contains the grievance mechanism provisions. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Our code of conduct, 20/04/2022: <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: Describes how workers in EX BPs access grievance mechanism: The Responsible sourcing standards for suppliers indicates: 'All suppliers, including their employees, business associates or others may use the independently managed 'YourVoice' facility to report any potential or actual breach of this Standard, Legal requirements or inappropriate behaviours exhibited by Anglo American or De Beers Group staff'. [Responsible sourcing standards for suppliers, 01/06/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs: No information found.</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	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: Grievance mechanism accessible to all external individuals and communities: The 2022 Sustainability Report indicates: 'To ensure accountability, our Your Voice confidential reporting service empowers employees, contractors, suppliers and other stakeholders to raise concerns anonymously about potentially unethical, unlawful or unsafe conduct or practices that conflict with our Values and Code of Conduct. YourVoice is operated by an independent multilingual whistleblowing service provider. [...] Our operational assets also run site-level grievance mechanisms to allow community and other external stakeholders to raise issues with us'. The Whistleblowing Policy discloses the different channels available, including the 'YourVoice web platform'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Group Whistleblowing Policy, 16/11/2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The webpage section Your Voice is available in multiple languages. However, it is not clear how the Company ensures all affected external stakeholders at its own operations are made aware of it. [YourVoice website, N/A: <a href="http://app.convercent.com">app.convercent.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The Responsible sourcing standards for suppliers indicates: 'All suppliers, including their employees, business associates or others may use the independently managed 'YourVoice' facility to report any potential or actual breach of this Standard, Legal requirements or inappropriate behaviours exhibited by Anglo American or De Beers Group staff'. However, although indicates that 'others' can report against the Company's breaches, it is not clear whether business partners' external stakeholders can also file complaints in relation to extractive business partners' behaviour. [Responsible sourcing standards for suppliers, 01/06/2020: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	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 users engaged on design and performance: The 2022 Sustainability Report indicates: 'Our operational assets also run site-level grievance mechanisms to allow community and other external stakeholders to raise issues with us'. The Social Way Toolkit explains: 'the more collaborative the design process, the more effective the grievance process is likely to be. [...] Sites should: Consult with communities on the design of the grievance process. Practical difficulties (literacy, geographically dispersed communities, connectivity), customary or cultural issues, and difficulties in making the grievance process accessible to all stakeholders (including women and vulnerable groups) should be identified and factored into the design process'. Regularly solicit feedback from external stakeholders on the design and function of the grievance process. Incorporate that feedback into the analysis and continued improvement of the grievance process'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>] &amp; [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism: See above. The Social Way Toolkit adds: 'Regularly solicit feedback from external stakeholders on the design and function of the grievance process. Incorporate that feedback into the analysis and continued improvement of the grievance process'. However, no further details found, including whether actual or potential users are engaged on the improvement of the mechanism. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	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>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Social Way Toolbox indicates: 'Sites should send an acknowledgment of receipt to the complainant, including an overview of the investigation and resolution process to be followed. Sites should set clear timeframes within which the complainant can expect a proposed resolution in line with the grievance process in place, so that the complainant is assured of the predictability and transparency of the process. This timeframe needs to be practically feasible for the teams, while at the same time respecting the stakeholder's needs and expectations. Where there is a clear sense of urgency regarding a grievance (e.g. due to public outcry or perceptions of ongoing harm), it may need to be resolved more quickly. In instances where timeframes set in the grievance process cannot be met, an interim response should be provided, explaining what actions are being taken, that there will be a delay, the reasons for this, and the revised date for a proposed resolution'. It discloses a table with different level for grievances. For each level, it indicates the time scale for issuing a 'confirm receipt', 'Initiate preliminary consultations with complainant' and 'Start investigation'. Level 4-5 seem to be the most urgent levels: 'Confirm receipt within 24 hours; Initiate preliminary consultations with complainant within one day; Start investigation within two days'. The 2022 Sustainability Report indicates: 'Our focus is therefore on incidents with the most severe actual or potential human rights impacts. Such incidents are generally categorised as incidents with Level 4–5 safety, health, environment or social consequences. [...] Adverse impacts on labour rights in the workplace outside of safety and health – such as discrimination, bullying, victimisation and harassment – are reported through YourVoice or human resources processes, but not currently categorised using the same 1–5 severity levels'. Therefore, it is not clear the timescales to inform and address Human Rights issues raised in general, and how complainants are informed throughout the process. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="https://staticcontents.investis.com">staticcontents.investis.com</a>] &amp; [2022 Sustainability Report, 03/03/2023: <a href="https://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> <li>Score 2</li> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: The Whistleblowing Policy indicates: 'Anglo American does not tolerate any form of retaliation against anyone for raising or helping to address a concern'. [Group Whistleblowing Policy, 16/11/2022: <a href="https://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: The 2022 Sustainability Report indicates: 'To ensure accountability, our Your Voice confidential reporting service empowers employees, contractors, suppliers and other stakeholders to raise concerns anonymously'. [2022 Sustainability Report, 03/03/2023: <a href="https://angloamerican.com">angloamerican.com</a>]</li> <li>Score 2</li> <li>• Not Met: Specifies no legal action, firing or violence: The Whistleblowing Policy indicates: 'No employee who makes a disclosure, reasonably believing it to be true, will as a consequence of making the disclosure be subject to retaliation, which includes being: Subjected to any disciplinary action. Dismissed, suspended, demoted, harassed, or intimidated. Transferred against his or her will. Refused transfer or promotion. Subjected to a term or condition of employment or retirement which is altered or kept altered to his or her detriment. Refused a reference or provided with an adverse reference. Denied appointment to any employment, profession, or office. Otherwise adversely affected in his or her employment, including employment opportunities and work security'. However, no further evidence found indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [Group Whistleblowing Policy, 16/11/2022: <a href="https://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: It is not clear the Company expects its extractive business partners to prohibit retaliation against workers and other stakeholders (including those that represent them) for raising human rights related concerns. It is not clear that business</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			partners' external stakeholders can file complaints in relation to business partners' behaviour.
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse 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: Describes how remedy would be provided if no adverse impact identified: The Social Way Toolbox indicates: 'As far as possible, the search for a mutually satisfactory resolution to a grievance should be conducted in a spirit of co-operation and dialogue. The objective is to agree through discussion with the complainant(s) rather than through legal channels [...]. Where an adverse impact has been established, sites have a responsibility to provide remediation. There are typically four types of remediation, a combination of which may be used: Rehabilitation: the complainant may need a range of rehabilitative care with independent oversight, to allow he/she to reconstruct his/her life plan or to reduce, as far as possible, the harm suffered. Restoration: restore the complainant to the original position before the incident occurred. Restoration may provide a more effective remedy than compensation. Satisfaction: satisfaction can take multiple forms, including cessation of a continued practice, changes to policies or practices, a public apology from the company, or sanctions against wrongdoers. A genuine and meaningful public apology can be a vital remedy to partly restore what cannot be compensated or restored. Compensation: when compensation is provided to the complainants, this should be fair and proportional to the gravity of the harm suffered and never offered in lieu of potential criminal liability. In cases in which an agreement is signed by a representative on behalf of a community, confidentiality should not prevent the flow of information within the community about the process and the content of the agreement'. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy: Regarding its investigations of grievances/incidents, the Social Way Toolbox indicates: 'Any specific findings from the investigation that require action must be captured in an action plan, which must be tracked at site level until completion. The site is responsible for ensuring that all actions stemming from an incident investigation are closed-out in a timely fashion'. However, no further details were found including the approach to monitor implementation of agreed remedy. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified: Regarding its investigations of grievances/incidents, the Social Way Toolbox indicates: 'Findings from incident investigations should be shared across the Group in order to prevent similar social incidents from occurring elsewhere in the business. The site's Social Performance business partner should be informed in order to help share the learnings, including via Global Calls to Action as appropriate'. However, it is not clear the approach it would take to review and change systems, processes or practices to prevent similar adverse impacts in the future. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2022 Sustainability Report indicates: 'During 2022, we received 1,089 reports through YourVoice, a 37% increase from 2021. We attribute the increase to a heightened awareness of the channel because of several management initiatives, including the establishment of the Living with Dignity Hub and the Call It Out Hubs in South Africa and Australia, and a growing culture of trust to raise concerns with confidence. Of those allegations closed, 29% were substantiated or partially substantiated. Corrective actions were taken against substantiated allegations in accordance with our policies, resulting in 177 sanctions against employees and contractors, which include 56 exits from the company'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, no further information found including the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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: Pays living wage or sets time-bound target: The 2021 Annual Report indicates: 'Anglo American has been an accredited Living Wage employer in the UK since 2014 via the Living Wage Foundation. In 2021, as a result of the maturity and availability of Living Wage reference values for all the countries in which Anglo has a presence, we were able to conduct an in-depth assessment to understand our overall position regarding the Living Wage and our global employee workforce. Following this study, the following commitments were agreed and published on our corporate website: We are committed to ensuring that every employee at Anglo American earns a fair wage, and we are confident that this principle is applied to all of our employees in each of our locations. We are committed to formalising our approach to fair pay by: a. partnering with an independent third party (the Fair Wage Network), with an aim to become an accredited Living Wage employer globally in 2022 (we are already accredited by the Living Wage Foundation in the UK) b. incorporating a Living Wage analysis into our annual pay review processes to ensure we adhere to fluctuating Living Wage benchmarks. [...] Anglo American has been in partnership with the Fair Wage Network since March 2021. [...] In January 2022, we commenced the accreditation process with the Fair Wage Network, with a view to formalising our status as a committed Living Wage employer. Presently, our focus is on direct employees, with the intention to focus on contractors and suppliers in the future'. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how living wage determined: The 2021 Annual Report indicates: 'In 2021, as a result of the maturity and availability of Living Wage reference values for all the countries in which Anglo has a presence, we were able to conduct an in-depth assessment to understand our overall position regarding the Living Wage and our global employee workforce. [...] Anglo American has been in partnership with the Fair Wage Network since March 2021. The Fair Wage Network is a trusted organisation that has developed an online database that covers Living Wage reference values for every country in the world and is considered an expert in this field. In January 2022, we commenced the accreditation process with the Fair Wage Network, with a view to formalising our status as a committed Living Wage employer. Presently, our focus is on direct employees, with the intention to focus on contractors and suppliers in the future'. However, it is not clear how it determines a living wage for the regions where it operates, including with the involvement of relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying living wage: The 2021 Annual Report indicates: 'Anglo American has been an accredited Living Wage employer in the UK since 2014 via the Living Wage Foundation. [...] In January 2022, we commenced the accreditation process with the Fair Wage Network, with a view to formalising our status as a committed Living Wage employer'. However, it is not clear it pays a living wage to all its workers. [2021 Integrated annual report, 2022: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul>
D.3.2	Transparency and accountability (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"> <li>• Met: Member of EITI: The 2022 Sustainability Report indicates: 'We have been a signatory to the Extractive Industries Transparency Initiative (EITI) since its inception'. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country: The Company publishes a Tax and economic contribution report covering total tax and economic contribution by country. However, it is not clear that the Company publicly reports taxes and revenue payments to all countries where it operates, as its webpage indicates it has business in China and India and tax and revenue payments for these two countries were not included in the report. [Tax and Economic Contribution Report 2021, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Steps taken to promote transparency in non EITI countries</li> <li>• Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements</li> </ul>
D.3.3	Freedom of association and collective bargaining (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"> <li>• Met: Measures to prohibit violence/retaliation against workers for joining trade union: High union recognition, in this case 67%, is taken as a proxy for not intimidating or retaliating. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Discloses % of total direct operations covered by CB agreements: The 2022 Sustainability Report indicates: 'Approximately 67% of our permanent workforce was represented by worker organisations and covered by collective bargaining agreements'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1</li> </ul>
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease 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"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The 2022 Sustainability Report indicates: 'We continue to review and strengthen all operational risk management (ORM) components to ensure they remain effective and provide relevant information for reporting and interventions. Digital critical control monitoring (DCCM) is an area where we have renewed our focus to enhance the access to 'live' information, reducing the reliance upon manual verification, which in turn facilitates timely interventions to mitigate emerging risk factors. We have developed and are executing an implementation plan for DCCM across our global footprint. [...] In October 2022, we introduced our Process Safety Management Standard, a disciplined framework to manage the integrity of potentially hazardous operating systems and processes by applying safe design principles, engineering, operating and maintenance practices. Our Process Safety Management Standard and Specification is aligned with international best practice and integrated with existing processes. It draws on lessons learned through previous incidents at Anglo American and other industry peers, which have shown that the application of a systematic process safety framework will strengthen the understanding, management and learning of process safety risks'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The 2022 Sustainability Report indicates that the total recordable injury frequency rate in 2022 was 2.19. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Discloses fatalities for last reporting period: The 2022 Sustainability Report indicates: 'Safety incidents with severe human rights impacts involved two losses of life in 2022'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Met: Discloses occupational disease rate for last reporting period: The 2022 Sustainability Report indicates: 'In 2022, there were 5 reported new cases of occupational disease, all related to noise exposure (2021:16)'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company discloses its health and safety targets. Regarding to work-related fatal injuries, the 'Target: Zero'. As for the total recordable injury frequency rate, the 'Target: Year-on-year reduction'. Finally, concerning new cases of occupational disease, 'Target: Year-on-year reduction'. [2022 Sustainability Report, 03/03/2023: <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: Met targets or explains why not or actions to improve H&amp;S management systems: The 2022 Sustainability Report indicates it has met its total recordable injury frequency rate and new cases of occupational disease targets. As for fatalities, as indicated above, there were two fatal cases in 2022. The Company explains the each incident. It adds: 'Safety is often the first topic discussed in meetings across the Group, from operations to our corporate offices. We continually focus on improving our safety performance by strengthening our culture and making specific safety interventions when we see deficiencies in our operations. As part of our continuous practice of safety interventions, we continued to focus on CEO safety summits with senior leaders from across the business units; observing and continuously monitoring mandatory critical controls for common catastrophic and fatal risks; sharing of lessons learned and actions taken from incidents across the organisation; safety. [...] As part of our Elimination of Fatalities drive, we adopted the Risk and Assurance Governance Framework, built on the Three Lines Model of the Chartered Institute of Internal Auditors. We are committed to embedding this approach across the business. We are seeking to understand where we are most vulnerable, as well as improving risk understanding and management to prevent repeat incidents. stand-downs (voluntary events to pause production and talk with employees and contractors about safety); employee engagement sessions; and enhanced reporting and progress tracking of safety-improvement initiatives'. [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify/recognise indigenous rights holders: Regarding the process to confirm presence of Indigenous Peoples, the Social Way Toolbox indicates: 'In most cases, a review of literature, United Nations and NGO documentation, and stakeholder engagement activities as part of the external context review, will indicate whether indigenous groups live on or use the land within a site's Area of Influence, or if Indigenous Peoples' lands or traditional territories overlap with a site's Area of Influence. In other cases, it may be more difficult to establish the presence of indigenous groups. In such cases, the process of identifying the presence of indigenous groups and the extent of their land and territories should include engagement with relevant government agencies and experts on local Indigenous Peoples. The community itself should also have a say through their chosen representative'. It also discloses a list of criteria to define Indigenous Peoples. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> <li>• Not Met: Describes how indigenous communities are engage during assessment: The Social Way Toolbox [fourth version] indicates: 'Potential impacts on indigenous people should be assessed and a summary of potential impacts and risks included in SHIRA [Social and Human Rights Impact and Risk Analysis]'. However, it is not clear Indigenous Peoples are involved in the assessment. Moreover, 'Sites are required to establish a Community Engagement Forum (CEF). Depending on the nature and size of the affected communities, a separate Indigenous Peoples Engagement Forum may need to be established; for instance, where the affected community consists of a large community with significant indigenous and non-indigenous populations'. However, it is not clear engagement also occurs in the context of impact assessments. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commitment to FPIC: The Human Rights Policy indicates: 'With great respect for the close connection of Indigenous Peoples to the land, we remain committed to obtaining and maintaining Free, Prior and Informed Consent (FPIC) for all relevant projects, in line with the 2013 ICMM Position Statement on Indigenous Peoples and Mining and IFC Performance Standard 7'. [Human Rights Policy version 3, 10/2021: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2022 Sustainability Report indicates: 'In Canada, where our operations affect Indigenous Peoples, we have worked with the local First Nations communities to agree impact and benefit agreements'. However, it is not clear it has it has obtained free prior and informed consent (FPIC). [2022 Sustainability Report, 03/03/2023: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights: Land acquisition (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"> <li>• Not Met: Describes approach to identifying land tenure rights holders and negotiating compensation: The Social Way Toolbox indicates: 'During the Discovery phase, initial engagement with communities on, and the site's management of, land access and temporary and/or permanent displacement set the tone and precedent for the remainder of the lifecycle. It is critical that temporary land access is managed through an appropriate LAP [land access procedure] and that no premature commitments are made regarding entitlements, compensation or future potential permanent displacement. [...] Eligibility for compensation or resettlement assistance should take the type of tenure arrangement into consideration. For instance, those who do not have a recognisable legal right or claim to the land and/or assets they use and/or occupy may not be eligible for compensation for the land they use/occupy, but (depending on context) may be eligible for livelihood restoration and compensation for fixed assets established on the land'. However, it is not clear how it identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process, with particular attention to vulnerable or marginalised tenure rights holders and how it negotiates with them to provide adequate compensation or requested alternatives to financial compensation. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation</li> <li>• Not Met: Describes steps to meet IFC PS 5 in state deals: The Social Way Toolbox indicates: 'Stakeholders involved in ASM [artisanal and small scale mining] may fall under the category of land users who do not have a recognisable legal right or claim to the land and/or assets they use and/or occupy (e.g. because they operate informally or illegally). As per IFC Performance Standard 5, such land users are eligible for inclusion in a resettlement or livelihoods restoration process. The Guidance Note on IFC 5 states, however, that this does not apply in case of impacts by project activities 'other than land acquisition or restriction of access to land use', for example the loss of access to state-owned sub-surface mineral rights by artisanal miners. In such cases, Guidance Note 5 requires the application of IFC Performance Standard 1, which mandates the application of the mitigation hierarchy and the establishment of appropriate mitigation measures for affected people'. However, it is not clear that if a state has been involved in the transaction, the Company follows IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement. Moreover, the Company is expected to describe the steps it has taken/would take to meet the standards with respect to legitimate tenure rights holders. [Anglo American Social Way V.4 (Social way toolkit), N/A: <a href="http://staticcontents.investis.com">staticcontents.investis.com</a>]</li> </ul>
D.3.7	Security (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"> <li>• Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company discloses an Annual report for the Voluntary Principles on Security and Human Rights where it reports on how it implements its security approach by country: 'Anglo American's business units manage more than 30 mining operations and 10 processing operations globally, including in Australia, Brazil, Chile, Peru and South Africa. Anglo American has non-managed joint venture operations, including in Botswana, Canada, Namibia and South Africa. Exploration activities are conducted in various countries, including Angola, Australia, Brazil, Canada, Ecuador, Finland, Peru, South Africa and Zambia'. It reports on most of them. It also indicates that: 'The Social Way states training in human rights and the VPs is essential for private security contractors. Training is currently provided by sites to employees, private security personnel and, in some cases, public security personnel'. In 2021: 'A total of 5,842 personnel (comprising employees, and private and public security personnel) participated in our security and human rights training courses'. It discloses the number of personnel trained by country. [Annual report for the Voluntary Principles on Security and Human Rights 2021, 2022: <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: Ensures Business Partners/JVs follow security approach: The Annual report for the Voluntary Principles on Security and Human Rights indicates: 'As stated in the Social Way, the procurement of private security contractors should involve gathering certain information about contractors – including the contractor's history of respect for human rights; and training provided by the contractor to its employees on human rights, including the VPs and policies and systems in place to meet the VPs requirements. Before mobilisation, the background of all private security staff must be checked as part of a pre-employment screening to ensure that individuals credibly implicated in human rights abuses are not deployed. Contracts with private security providers are required to include commitments to adhere to the VPs and International Code of Conduct for Private Security Contractors. Information about the training we provide for private security contractors is set out in the next section'. [Annual report for the Voluntary Principles on Security and Human Rights 2021, 2022: <a href="http://angloamerican.com">angloamerican.com</a>] Score 2</li> <li>• Met: Security and HRs assessment includes input from local communities: Regarding its Site-level risk and impact assessments, it indicates: 'Engage with stakeholders such as local communities, public security providers, host-country governments and nongovernmental organisations and human rights defenders to understand the external context and any actual or potential security-related social and human rights impacts. [...] Identify potential security-related risks and impacts, drawing on the information gathered, including in relation to threats to site staff, protests against the site, conflict within and between local communities, intimidation and harassment of local communities and organised crime'. [Annual report for the Voluntary Principles on Security and Human Rights 2021, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Two examples of working with local communities to improve security: The Annual report for the Voluntary Principles on Security and Human Rights indicates: 'Kumba Iron Ore provided both in-person and online VPs training to employees, private security personnel and public security personnel. In addition to covering the principles set out in the VPs the training covered specific human rights, including the rights to: life, security of person, peaceful assembly and freedom of movement. Local communities were invited to attend in-person training'. However, the Company is expected to provide two examples of working with community members to improve security or prevent or address tensions related to its operations. [Annual report for the Voluntary Principles on Security and Human Rights 2021, 2022: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Describes preventative/corrective action plans for water and sanitation risks: The 2022 Sustainability Report indicates: ‘Our Group Water Management Standard (WMS) provides guidance for our work. The standard sets out minimum requirements for water management and incorporates leading water management practices, risk prevention, best mining practices and industry lessons. [...] Water security at our operations is a principal risk for the Group. [...] We need to understand our exposure to the three aspects of water risk – physical, reputational and regulatory – to be able to prevent value destruction and identify where the opportunities for future positive outcomes lie’. It provides different examples: ‘We continued our efforts to divert fresh water for beneficial use and increase water supply to host communities near our Los Bronces operation in Chile. Our integrated water security project (IWSP), which comprises two phases, involves replacing the bulk of the current fresh water sources for the Los Bronces mine with treated waste water. In the first phase, in September 2022, we signed an agreement with Aguas Pacífico, a Chilean water desalination and solutions provider, to secure desalinated water for our Los Bronces copper mine. In this first phase, the desalination plant will supply up to 500 litres per second (l/s) of desalinated water to the mine from 2025, via a pipeline the plant to a water reception pool at our Las Tórtolas operation. This desalinated water will supply more than 45% of Los Bronces’ needs while also providing clean water to approximately 20,000 people in the communities of Colina and Til Til, local to the operation and also to approximately 15,000 people along the pipeline. In the second phase, we are also planning an innovative regional swap scheme to provide desalinated water for human consumption in exchange for treated wastewater that will supply our operation and is currently being discharged into the ocean. This would allow us to stop withdrawing any fresh water for Los Bronces – our ultimate goal – while further enhancing the provision of clean water to local communities in the greater Valparaiso area. The benefits of the IWSP will be wide-reaching. The project will not only provide clean water to host communities, it will also provide a permanent water supply solution for Los Bronces, a key factor in maintaining current and potential future production levels, as well as contributing significantly to the Group’s 2030 fresh water reduction target’. More examples of identified risks in the Company’s direct operations and its response to those risks can be found in the 2020 CDP. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>] &amp; [CDP Water 2020, 2020: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities: The 2022 Sustainability Report indicates: ‘We strengthened our commitment to our Sustainable Mining Plan through the inclusion of our target to reduce the abstraction of fresh water in water scarce areas by 50% by 2030 in the sustainability-linked bond that the Group issued in September’. However, it is not clear the target on water that take into consideration water use by local communities and other users in the vicinity of its different operations. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Reports progress in meeting targets and trends demonstrating progress: The 2022 Sustainability Report indicates: ‘Our fresh water withdrawals included within our Sustainable Mining Plan target decreased by a further 3% to 35,910 ML (2021: 36,888 ML). This is a total reduction of 26% against the 2015 baseline that informs the Sustainable Mining Plan target – one that we are well-positioned to achieve. The reductions in fresh water were mainly due to significant increases in efficiency at the Amandelbult (PGMs) and Venetia (De Beers) mines. The sites achieved this by improving their water re-use and recycling rates, reducing their reliance on fresh water. This focus on efficiency will continue at all our operations throughout 2023’. However, as indicated above, it is not clear how this target takes into consideration water use by local communities and other users in the vicinity of its different operations. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.9	Women's rights (in own extractive operations, which include JVs)	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: Describes processes to stop harassment and violence against women: The 2022 Sustainability Report indicates the Living with Dignity framework was created 'to tackle gender-based violence (GBV) that we launched at the end of 2019. [...] Living with Dignity represents a call to action for all parts of the business to work towards a mining ecosystem that is free from harm and supports dignity and equality. The launch of the Living with Dignity Hub in South Africa is a recent example of how we are investing in providing employees and contractors experiencing harm at home or at work with an additional and independent way of accessing support. [...] On the community front, our work on tackling GBV focuses largely on gender mainstreaming, starting with a full review of our core policies and processes to ensure they deliver positive outcomes for women and other vulnerable groups. This process includes integrating requirements that protect the vulnerable groups we work with in communities against sexual exploitation and abuse. Outside of our work on gender mainstreaming, we launched two major projects in 2022. First, we were a founding member of the Minerals Council of South Africa partnership with the National Prosecuting Authority and the National GBVF Response Fund. The partnership supports a collaborative approach between mining companies and the aforementioned entities to strengthen GBV response measures in mining communities through 'one stop centres' called Thuthuzela Care Centres. These centres offer victims – in most cases women and children – medical, psycho-social and legal support and increase significantly the likelihood of successful conviction of perpetrators. The second project is a national campaign to ensure that survivors of rape have better access to care and justice. The project is a collaboration between Anglo American and several partners – Rape Crisis, Mosaic, the Institute of Security Studies and the University of Cape Town Nelson Mandela School of Public Governance – and is being funded through a grant from Co-Impact Gender Fund'. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> <li>• Not Met: Working conditions take into account gender issues</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2022 Sustainability Report indicates: 'We report on our gender pay gap in UK operations, in line with legislative requirements. As of 5 April 2022, our UK average (mean) gender pay gap for Anglo American Services Ltd (UK) was 39% and our median pay gap was 29% (2021: 44% mean and 33% median). This was primarily due to the high representation of men in the most senior management roles in our UK head office – an issue mirrored across our sector, and one that we continue to address. We also continue to make further progress to reach our gender representation goal of 33% female representation by the end of 2023 at all management levels across the business'. The UK Gender Pay Gap Report discloses different metric to measure pay gaps. However, it is not clear how it measures its gender pay gap outside the UK throughout levels of employment. [2022 Sustainability Report, 03/03/2023: <a href="https://www.angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>



## 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"> <li>• Area: Right to a safe, clean, healthy and sustainable environment; Land Rights; Right to security of persons</li> <li>• Headline: Colombia's Constitutional Court decided to suspend Cerrejon's permit to divert stream over lack of consultations with local indigenous groups.</li> <li>• Story: Glencore is a joint-venture partner (with BHP Billiton and Anglo American) 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 litres 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. <p>In January 2021, a coalition of human rights and environmental NGOs led by the Global Legal Action Network (GLAN) demanded before the Organization for Economic Co-operation and Development the closure of the Cerrejón coal project in Colombia. The activists filed simultaneous complaints before the OECD National Contact Points in Australia, Ireland, Switzerland and the UK, alleging "serious human rights abuses and devastating environmental pollution" at Cerrejón. [Mines and Communities, 27/02/2016, "Cerrejon Coal: brutal evictions of villagers resisting relocation": <a href="http://londonminingnetwork.org">londonminingnetwork.org</a>] [The Business &amp; Human Rights Resource Centre, 02/03/2019, "Colombia: Indigenous communities file lawsuit over lack of impact assessment in alteration of environmental license for Cerrejón coal mine; concerned at impact on health of locals": <a href="http://business-humanrights.org">business-humanrights.org</a>] [London Mining Weekly, 28/01/2022, "OECD accepts complaints against Anglo American, BHP and Glencore at Cerrejón": <a href="http://londonminingnetwork.org">londonminingnetwork.org</a>] [GLAN, 20/12/2022, "Human Rights &amp; Environmental harms at Cerrejón Mine": <a href="http://www">www</a></p> </li> </ul>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: Anglo American accepted an invitation from the UK NCP to respond to the OECD Complaint, and denies the allegations made by the Complainant. The company raised a number of objections to the Complaint. These include: that they consider the Complaint ignores the fact that each of the Investors only has an indirect, one-third shareholding in Cerrejón, none of the current Shareholders is able to exercise independent management or control over</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Carrejón's activities; that they believe similar issues have been, or are being, considered in other domestic or international proceedings, creating a risk of inconsistent findings by the NCP; that they consider the Complainant's allegations are broad-ranging, not specific and not adequately substantiated; that they consider the wide-ranging nature of the issues raised in the Complaint, and the diverse interests of local communities and other stakeholders, render the Complaint unsuitable for resolution via the NCP process. [GOV.UK, 10/01/2022, "Initial assessment: Global Legal Action Network complaint to the UK NCP about Anglo American": <a href="https://www.gov.uk">gov.uk</a>] [Response to Global Witness request for information on allegations relating to Carrejón, 03/03/2021: <a href="https://globalwitness.org">globalwitness.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company in its response merely denied the allegations made by the complainant and presented objections to the complaint based solely on formal/procedural issues but did not go into the merits of the matter (see above). Therefore, the company's response cannot be considered detailed because it does not address any of the substantive aspects of the allegation.</li> </ul>
E(1).2	The company has investigated and taken appropriate action	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>• Not Met: Engaged with stakeholders: There is no evidence that Carrejon has investigated the underlying causes of water shortages or food security. There has been stakeholder engagement through community consultations, however, those were directed at resettlement issues. There is no evidence suggesting the company has engaged with the affected stakeholders regarding the death threats against activists.</li> </ul> <p>In addition, the company points to the stakeholder engagement carried out by the interinstitutional group tasked with the technical investigation by the Colombian Constitutional Court in 2017. However, as one of the affected communities challenged the legitimacy of this group and therefore did not engage this cannot be considered to be meeting the requirements for this indicator.</p> <p>In response to the OECD complaint, Carrejon stated: "We have a large number of commitments in place, agreed with the communities themselves, to address legacy issues in a way that is in line with current international standards and that also seeks to respond to community expectations for the future." However, Carrejon did not specify what these commitments consist of.</p> <p>In an interview with Anglo American executives on the occasion of the publication of its AGM 2021 Report in April 2022, Mark Cutifani, Company Chief Executive, said, with regard to the Bruno Creek, that "the conversation between those who have been impacted and the final resolution is still a work in process between the three parties. There are always two sides of the conversation. Anglo American is trying to monitor whether there has been an appropriate process. The process is not at its end and therefore no final conclusion can yet be drawn". This sibylline response suggests that the company did not directly engage with the affected communities. [Carrejon Letter regarding Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>] [Carrejon, 16/08/2019, "Carrejón reports on partial diversion of Bruno Creek and application of constitutional court ruling": <a href="https://cerrejon.com">cerrejon.com</a>] [Mining.com, 20/01/2021, "NGOs file complaint before OECD, demand closure of Carrejón coal mine in Colombia": <a href="https://mining.com">mining.com</a>] [Colombia Solidarity Campaign, 09/05/2022, "We're Saving The World Too – Anglo American AGM Report": <a href="https://colombiasolidarity.org.uk">colombiasolidarity.org.uk</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Identified cause: Carrejon conducted community consultations regarding resettlement issues, however, it did not present investigative results regarding the underlying issues of these events or other parts of the alleged events.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: Since the submission of the OECD Complaint, Anglo American announced that it had entered into an agreement for the sale of its one-third interest in Carrejón to Glencore which completed in January 2022. However, the sale of Anglo American's holdings cannot be considered an 'improvement' relevant to the CHRB - intended to improve the human rights situation related to Carrejon's activity [GOV.UK, 10/01/2022: <a href="https://www.gov.uk">gov.uk</a>]</li> <li>• Not Met: Stakeholder input to steps taken: See above</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy: 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.</li> </ul> <p>Furthermore, in an interview with the company's executives on the occasion of the publication of its AGM 2021 Report in April 2022, when asked: "Is Anglo American prepared to provide resources to a reparations fund to compensate for the adverse effects the mine in Colombia has had – effects which will long outlast the company's departure?", Anglo American gave a sibylline answer, stating that an enormous amount had been done and was still being done by the local management. This ambiguous response suggests not only that no remedy has yet been provided, but also that Anglo American's intention to engage in providing some form of remedy to affected stakeholders is uncertain. [Cerrejon Letter regarding Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>] [Colombia Solidarity Campaign, 09/05/2022: <a href="https://colombiasolidarity.org.uk">colombiasolidarity.org.uk</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: On the basis of evidence available to the CHRB no remedies were provided. [Cerrejon Letter regarding Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>] [Colombia Solidarity Campaign, 09/05/2022: <a href="https://colombiasolidarity.org.uk">colombiasolidarity.org.uk</a>]</li> <li>• Not Met: Remedy delivered: On the basis of evidence available to the CHRB no remedies were provided. [Cerrejon Letter regarding Roche Community, 29/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>] [Colombia Solidarity Campaign, 09/05/2022: <a href="https://colombiasolidarity.org.uk">colombiasolidarity.org.uk</a>]</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Area: Health &amp; Safety</li> <li>• Headline: One worker dead and four others critically injured in accident at Moranbah North Coal Mine in Australia</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". [Australian Broadcasting Corporation, 21/02/2019, "Queensland mine shut down after grader driver dies in underground collision": <a href="https://abc.net.au">abc.net.au</a>] [Australian Mine Safety Journal, 20/02/2019, "Grader operator killed in underground collision": <a href="https://amsj.com.au">amsj.com.au</a>] [Australian Financial Review, 03/03/2020, "Anglo American charged with coal miner's death": <a href="https://afr.com">afr.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: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In response to the allegation, Anglo's executive head of underground operations, Glen Britton, said the mine would remain in shutdown until operations could be safely resumed. A Company statement further said that "The driver of the grader received immediate treatment on site and was then transported by ambulance to the hospital, but has tragically passed away. The</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 for further treatment." [Australian Broadcasting Corporation, 21/02/2019: <a href="http://abc.net.au">abc.net.au</a>] [Australian Mine Safety Journal, 20/02/2019: <a href="http://amsj.com.au">amsj.com.au</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Detailed response: In a statement issued shortly after the incident, Anglo said "The driver of the grader received immediate treatment on site and was then transported by ambulance to the hospital, but has tragically passed away. The 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 for further treatment." Thus acknowledging critical injuries sustained and the death of one of the victims. [Australian Broadcasting Corporation, 21/02/2019: <a href="http://abc.net.au">abc.net.au</a>] [Australian Mine Safety Journal, 20/02/2019: <a href="http://amsj.com.au">amsj.com.au</a>]</li> </ul>
E(2).2	The company has investigated and 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>• Not Met: Engaged with stakeholders: The company stated: "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". However, the Company does not clarify whether the conversations with the employees were undertaken to support an investigation into the causes of the incident. [Australian Broadcasting Corporation, 21/02/2019: <a href="http://abc.net.au">abc.net.au</a>]</li> <li>• Met: Identified cause: In a statement issued shortly after the incident, Anglo said the collision occurred "in the access drift close to the surface of the mine" [Australian Broadcasting Corporation, 21/02/2019: <a href="http://abc.net.au">abc.net.au</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: Anglo American immediately stopped production at the time and Queensland Mines Department staff are believed to be en-route to the site. However, there is no evidence that the company made changes to its management systems following the events and their human rights impacts. [Australian Broadcasting Corporation, 21/02/2019: <a href="http://abc.net.au">abc.net.au</a>] [Australian Mine Safety Journal, 20/02/2019: <a href="http://amsj.com.au">amsj.com.au</a>] [Australian Financial Review, 03/03/2020: <a href="http://afr.com">afr.com</a>]</li> <li>• Not Met: Stakeholder input to steps taken [Australian Mine Safety Journal, 20/02/2019: <a href="http://amsj.com.au">amsj.com.au</a>]</li> </ul>
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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>• Not Met: Provided remedy: The Company stated that "Our focus is on continuing to respond to the emergency situation, including the treatment and care of injured employees and supporting the affected families and colleagues." However, the Company does not indicate what this support entailed and there is no further evidence suggesting the company provided remedy to the affected stakeholders. [Australian Broadcasting Corporation, 21/02/2019: <a href="http://abc.net.au">abc.net.au</a>] [Australian Mine Safety Journal, 20/02/2019: <a href="http://amsj.com.au">amsj.com.au</a>] [Australian Financial Review, 03/03/2020: <a href="http://afr.com">afr.com</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: See above.</li> <li>• Not Met: Remedy delivered: See above.</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Area: Health &amp; Safety</li> <li>• Headline: Explosion at Anglo American coal mine in Australia injures five</li> <li>• Story: On May 6, 2020, the press reported that an explosion halted production at a coal mine run by Anglo American in Australia, leaving five people injured, and in critical condition after suffering burns to their upper bodies and airways following the blast.</li> </ul> <p>According to the press, it's not clear what had caused this ignition, but there had been several incidents where gas had been recorded above safe levels. State government mine inspectors are at the site and will go underground to investigate when gas levels return to a safe level. Union safety inspectors were also at the mine and will undertake a thorough, independent investigation into what caused a possible ignition of gas.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>On February 22, 2022, the Queensland Office of the Work Health and Safety Prosecutor (OWHSP) announced that it will not be laying charges against Anglo American following the 2020 explosion at its Grosvenor coal mine, which injured five workers. The Resources Safety and Health Queensland (RSHQ) also confirmed to the company that mining operations at Grosvenor coal mine could recommence following the incident.</p> <p>The Mining and Energy Union Queensland president Stephen Smyth said workers were angry and dismayed by the move. Mr Smyth claimed the Board of Inquiry outlined the mine's "repeated failure to drain dangerous gases in pace with production". He further added: "The report painted a picture of an accident waiting to happen. It was a foreseeable event and no action was taken to protect the miners at Grosvenor".</p> <p>[ABC News Australia, 06/05/2020, "Moranbah mine explosion may have started with 'ignition of gas along coal face', mine safety inquiry under consideration" -: <a href="http://abc.net.au">abc.net.au</a>] [Reuter, 06/05/2020, "UPDATE 1-Blast at Anglo American coal mine in Australia injures five": <a href="http://reuters.com">reuters.com</a>] [ABC News , 22/02/2022, "Anglo American avoids prosecution for foreseeable mine explosion" : <a href="http://abc.net.au">abc.net.au</a>] [Mining Weekly,- 22/02/2022, "Anglo American won't face charges for Grosvenor": <a href="http://miningweekly.com">miningweekly.com</a>]</p>
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: Immediately after the incident, an Anglo American spokesperson said Anglo American confirms that an incident at Grosvenor Mine has occurred. The company said "Five people have been injured and transported to the hospital. All of the injured people's families have been contacted. All remaining on-site personnel have been accounted for. The mine is in the process of being evacuated and operations stopped. Emergency response is currently underway. The mines inspectorate has been contacted and Anglo American is working to ensure the injured people have the best available medical care." Anglo updated the statement AM 7th May stating operations at the site remain suspended, as we work with relevant authorities to ensure the mine is safe to return underground to commence an investigation into the incident.</li> </ul> <p>In a later statement, Anglo American's chief executive of its Metallurgical Coal business, Tyler Mitchelson, said the company wanted to ensure this type of incident never happened again. [ABC News Australia, 06/05/2020 : <a href="http://abc.net.au">abc.net.au</a>] [Australasian Mine Safety Journal, 15/06/2020, "Anglo American Grosvenor Mine Explosion": <a href="http://amsj.com.au">amsj.com.au</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Detailed response: The company addressed the serious injuries sustained by the victims. [ABC News Australia, 06/05/2020 : <a href="http://abc.net.au">abc.net.au</a>] [Australasian Mine Safety Journal, 15/06/2020: <a href="http://amsj.com.au">amsj.com.au</a>]</li> </ul>
E(3).2	The company has investigated and taken appropriate action	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>• Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders.</li> <li>• Not Met: Identified cause: After the incident, Anglo American's chief executive of its Metallurgical Coal business, Tyler Mitchelson, said: "We are all devastated and we don't yet understand what caused this incident. Once it is safe to return underground, we will commence an expert technical investigation to ensure we understand what has happened."</li> </ul> <p>Anglo American reported on the 15 July 2020 that the preliminary investigation found there was a significant gas overpressure event at the mine immediately prior to the explosion but at this stage, they have been unable to confirm the ignition source or what caused the overpressure event.</p> <p>However, the investigation was undertaken by the Queensland Mines Inspectorate – Resources Safety &amp; Health Queensland, a governmental body, and the investigative results were reported by an inquiry commissioned by the Queensland state Labor government. The company did not report detailed and reliable investigation results on the incident. [ABC News Australia, 06/05/2020 : <a href="http://abc.net.au">abc.net.au</a>] [Australasian Mine Safety Journal, 15/06/2020: <a href="http://amsj.com.au">amsj.com.au</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: Anglo American's metallurgical coal business chief executive Tyler Mitchelson said at the time that the restart followed significant investment in new equipment. "Over the past 18 months, we have worked with leading industry experts and invested significantly in underground automation technology, remote operations, gas management and data analytics, to introduce a number of advancements in the way our</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>underground metallurgical coal mines operate. [...]Our scale in underground mining has allowed us to leverage technologies being developed and piloted at our other operations, to ensure [the] Grosvenor Mine restarted with the benefit of proven advancements in safety and technology."</p> <p>However, there is no evidence that the company made changes to its management systems following the event. [ABC News , 22/02/2022 : <a href="http://abc.net.au">abc.net.au</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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>• Not Met: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders.</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• Area: Health &amp; Safety</li> <li>• Headline: COVID-19: Brazilian prosecutors demand suspension of Anglo American's Minas Rio activities</li> <li>• Story: On 4 September 2020, Minas Gerais state prosecutors requested the suspension of activities at Anglo American's Minas Rio mine in Brazil for 30 days, given the company's failure to meet health protocols to avoid the spread of Covid-19. State prosecutors filed the injunction and requested a BRL 1 M (USD 189,270) daily fine as long as the company continues operations.</li> </ul> <p>Prosecutors also asked for a BRL 100,000 per day (USD 18,925) fine for each new employee the company hires, whose work agreement is non-compliant with health protocols established by city health administrations.</p> <p>The prosecutors pointed out that most cases in the region are linked to Anglo American's activities. Allegedly, Anglo American did not comply with a testing protocol set by local city health authorities. In the municipality of Dom Joaquim, the city reported that 90% of confirmed Covid-19 cases in the city originated from Anglo American.</p> <p>[Steel Orbis, 09/09/2020, "Prosecutors demand suspension of Anglo American's Minas-Rio activities" : <a href="http://steelorbis.com">steelorbis.com</a>] [G1, 05/09/2020, "Ministério Público pede suspensão das atividades do mineroduto Minas-Rio da Anglo American": <a href="http://g1.globo.com">g1.globo.com</a>]</p>
E(4).1	The Company has responded publicly to the allegation	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: Public response: In a statement, the company said that it is complying with all health and safety protocols, as well as health measures related to the coronavirus. It also informed that it has invested 50 million reais in actions to combat Covid-19.</li> </ul> <p>According to the company, 23,300 tests for Covid-19 were carried out as part of the Minas-Rio operation between July and August this year. It also pointed out that the tests were sent to the municipality of Conceição do Mato Dentro and neighbouring cities.</p> <p>In addition, 2,000 employees are working from home. [G1, 05/09/2020: <a href="http://g1.globo.com">g1.globo.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail. In particular, the company mentioned the actions it is allegedly taking to combat Covid-19, but did not address the enormous spread of the virus in the municipality of Dom Joaquin. [G1, 05/09/2020: <a href="http://g1.globo.com">g1.globo.com</a>]</li> </ul>
E(4).2	The company has investigated and taken appropriate action	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>• Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders.</li> <li>• Not Met: Identified cause: The company does not present investigative results on the underlying causes of the enormous spread of Covid-19 in the municipality of Dom Joaquin.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: According to the company declarations, "Since the beginning of the pandemic, the company has already invested more than 50 million reais in actions to combat and prevent Covid-19 to encourage research for tests and vaccines, respond to requests from municipalities through the purchase and donation of medical and personal protection equipment and respirators, community analysis, support for suppliers, the purchase of tests for Covid-19, as well as internal adjustments. The company has also taken all the necessary health measures to maintain the safety of its activities. We have adopted the minimum distance of two metres in common areas, the use of masks, temperature control in access to operations, about 2,000 employees of Minas-Rio have been working at a distance for about six months, reducing the movement of people in its operations, among other actions. However, it is unclear whether the company implemented these improvements as a result of the events concerned or had already implemented them beforehand. [G1, 05/09/2020: <a href="http://g1.globo.com">g1.globo.com</a>] [IBRAM, 04/05/2021, "Anglo American destina mais R\$ 13 milhões a ações de combate e prevenção à Covid-19": <a href="http://ibram.org.br">ibram.org.br</a>]</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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>• Not Met: Provided remedy: There is no evidence suggesting that the company provided remedy to the affected stakeholders.</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> <li>• Area: Health &amp; Safety; Right to safe, clean, healthy and sustainable environment</li> <li>• Headline: Anglo American sued over alleged mass lead poisoning from Kabwe Mine in Zambia</li> <li>• Story: On 21 October 2020, a class action lawsuit was filed against Anglo American over its alleged failure to prevent widespread toxic lead pollution in the Zambian town of Kabwe. Anglo SA was one of the owners of the Kabwe lead mine between 1925 and 1974. Then it was nationalised by the Zambian government, which operated it until it was closed in 1994.</li> </ul> <p>According to the filed legal documents: "The public environmental health disaster left behind by Anglo means there are more than 100,000 children and women of childbearing age in Kabwe who are likely to have suffered lead poisoning as a result of pollution caused by Anglo". The case is being brought by 13 representative plaintiffs. Some are children with very high blood lead levels and others are women, as lead pollution poses great risks to fetuses during pregnancy.</p> <p>On 15 January 2021, Africa Resources Watch (AFREWATCH), a Congolese human rights NGO sent a letter to the United Nations Committee on the Rights of the Child (CRC) regarding the alleged serious and ongoing violations to the development of children in Kabwe, Zambia, owing to toxic pollution emanating from the lead mine previously controlled by Anglo American South Africa Limited (AASA).</p> <p>The NGO claimed that Anglo American is violating the rights to health and development – one of the founding principles of Article 6 of the UN Convention on the Rights of the Child. It also alleged that because of Anglo American's alleged negligence, young children are suffering from alarming levels of lead poisoning that causes permanent physical damage to their bodily organs, neurological systems and fertility. The children will also suffer psychological, intellectual and behavioural damage. Many are at risk of brain damage and death.</p> <p>AFREWATCH expressed its support to the ongoing class-action lawsuit against Anglo American, which was filed in the Gauteng Division of the High Court of South Africa in October 2020.</p> <p>Kabwe, a mining town in northern Zambia, was managed by Anglo American group of companies between 1925 and 1974 when the majority of the lead poisoning was caused. Evidence has revealed that Anglo American was aware of the lead</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>poisoning. The residents have some of the highest lead levels in the world and health studies in Kabwe have recorded alarmingly high blood lead levels in children aged 5 years and younger.</p> <p>On 5 July 2021, law firms Mbuyisa Moleele and Leigh Day said a key witness had come forward, as a class action lawsuit continued against Anglo American in relation to alleged lead poisoning in Kabwe, Zambia.</p> <p>Dr Ian Lawrence, was a doctor at the Kabwe mine from 1969 until the early 1970s. The law firms alleged that his statement sheds light on the extent to which Anglo knew about the dangers of lead poisoning in Kabwe as early as 1970. Allegedly, the blood levels of staff were checked regularly and that mine management was aware of the risk of lead poisoning. Lawrence said he noted a prevalence of child deaths in the community living downwind of the mine and his tests showed high levels of lead in 500 children's blood tests, something he immediately flagged with his superior, Dr Frances Smith, who he was "almost certain was employed by Anglo American".</p> <p>On July 26 the UN published a letter from two UN special rapporteurs, to the government of Zambia, about the severe lead pollution and serious human rights concerns in and around the former mine in Kabwe, Central Province. According to press sources, Kabwe was the site of a mine and smelter that polluted the environment with extremely high levels of toxic lead from 1904 to 1994. Kabwe residents still have lead-polluted homes, backyards, schools, play areas, and roads, as documented in a 2019 report by Human Rights Watch. Tens of thousands of children living near the mine are at acute risk of severe health risks from lead poisoning. It is estimated that up to 200,000 people in the vicinity have elevated blood lead levels.</p> <p>On March 15, 2022, law firms Mbuyisa Moleele and Leigh Day accused Anglo American for trying to deny the allegations for lead poisoning and pass the blame to Zambia Consolidated Copper Mines (ZCCM), a state owned company that took over the mining operation in 1974 until it was closed in 1994.</p> <p>Following the Anglo American's denial of the allegations, the firms argued in a statement that "It is contradictory for Anglo to argue, on the one hand, that elevated soil and blood lead levels are not due to the mine and, on the other hand, to accuse ZCCM of recklessness and neglect over its handling of the mining operations and failure to clean-up". Zanele Mbuyisa, partner at Mbuyisa Moleele also added "Anglo has consistently denied responsibility for the Kabwe tragedy. With this filing, we submit further strong evidence to demonstrate the inextricable link between Anglo's operations and the ongoing contamination in Kabwe, supported by world-class expert witnesses and a wealth of evidence."</p> <p>Lawyers from firms Mbuyisa Moleele and Leigh Day also stated that blood lead levels in Zambia's central Kabwe district have caused cognitive impairment in an important proportion of the population and are higher than the levels of residents in Flint, Michigan, the United States where an approximate of USD 600 m settlement was reached with people who suffered from lead poisoning. [The Guardian, 21/10/2020, "Anglo American sued over alleged mass lead poisoning of children in Zambia": <a href="https://www.theguardian.com">theguardian.com</a>] [Business &amp; Human Rights Resource Centre, 15/01/2021, "AFREWATCH urges the Committee on the Rights of the Child to investigate lead poisoning claims against Anglo American in Kabwe, Zambia, lawsuit": <a href="https://www.business-humanrights.org">business-humanrights.org</a>] [Mining Weekly, 05/07/2021, "Lawyers say key witness comes forward as alleged lead poisoning case against Anglo continues": <a href="https://www.miningweekly.com">miningweekly.com</a>] [Mining.com, 15/03/2022, "Zambia lead poisoning victims seek court approval for Anglo case ": <a href="https://www.mining.com">mining.com</a>]</p>
E(5).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>Met: Public response: After the filing of the complaint, a company spokesperson said: "Anglo American reports that a case has been filed in South Africa in relation to alleged lead poisoning in Zambia, No such claim has yet been served on Anglo American. Once the claim is received, the company will review the claims made by the firm and will take all necessary steps to vigorously defend its position. By way of context, Anglo American was one of a number of investors in the company that owned the Kabwe mine until the early 1970s. Anglo American was, however, at all times, far from being a majority owner."</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Speaking with Reuters, the company added that it was one of several investors in the mine before it was nationalised. It added: "Furthermore, in the early 1970s, the company that owned the mine was nationalised by the Government of Zambia and for more than 20 years thereafter the mine was operated by a state-owned body until its closure in 1994."</p> <p>On October 30, 2020, Anglo American CEO Mark Cutifani said the company was not responsible for lead poisoning in Zambia at a lead mine it part-owned nearly 50 years ago and planned to defend itself after a class action was filed against the miner over allegations of negligence. "We intend to defend our position as we don't believe Anglo American is responsible for the current situation," said Cutifani said during the presentation of a company sustainability report.</p> <p>In addition, the company has a page on its website called "Our position on the Kabwe legal claims" specifically dedicated to the Kabwe mine claim, in which it provides statements to refute the allegations of the class action.</p> <p>[The Guardian, 21/10/2020: <a href="http://theguardian.com">theguardian.com</a>] [Mining.com, 30/10/2020, "Anglo American CEO says not responsible for lead poisoning in Zambia": <a href="http://mining.com">mining.com</a>] [Reuters, 21/10/2020, "Anglo American's S.Africa unit faces class action over Zambia lead poisoning": <a href="http://reuters.com">reuters.com</a>] [Our position on the Kabwe legal claim, N/A: <a href="http://angloamerican.com">angloamerican.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: On the webpage dedicated to the lawsuit, the company addresses the allegations by stating "Anglo American has every sympathy for the people of Kabwe, the pollution that they experience today and any harm that has come from it. Contamination is not acceptable anywhere." However, the Company is not addressing the impacts of the contamination on the environment and the population. [Our position on the Kabwe legal claim, N/A: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul>
E(5).2	The company has investigated and taken appropriate action	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>• Not Met: Engaged with stakeholders: There is no evidence suggesting that the company ever engaged with the affected stakeholders.</li> <li>• Not Met: Identified cause: The company argues that lead poisoning is to blame for the activities carried out at the mine after it sold its shares. However, it does not present investigative results corroborating this theory. [Our position on the Kabwe legal claim, N/A: <a href="http://angloamerican.com">angloamerican.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: According to the plaintiffs' lawyer, the company "failed to take measures to prevent and minimise lead poisoning of the community; additionally, AASA failed to ensure the clean-up of the communities' contaminated land". The company did not provide any evidence or statement to refute these allegations nor does it present evidence that it generally implemented improvements or reinforced its management system to avoid such human rights impacts in the future</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(5).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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>• Not Met: Provided remedy: The company denies its responsibility and did not provide any form of remedy to the affected stakeholders.</li> <li>• Not Met: Evidence for lack of Impact or link: The company reiterated that it is not responsible for lead poisoning in Zambia at Kobwe lead mine, denying it ever owned the assets and passing blame to the state-owned Zambia Consolidated Copper Mines that took over the operation in 1974.</li> </ul> <p>Lawyers for the plaintiffs, however, said most of the pollution happened when the mine was part of Anglo American South Africa and that AASA, despite its minority shareholding, had an actual role in controlling, managing, supervising, and advising on the technical, medical, and safety aspects of the mine's operations and should thus be considered liable.</p> <p>The company did not publicly provide sufficient evidence to refute such allegations of the plaintiff.</p> <p>[Mining Technology, 24/02/2022, "Paying for the past: how long can a miner be held responsible?": <a href="http://mining-technology.com">mining-technology.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> <li>• Area: Freedom of Association and Collective Bargaining</li> <li>• Headline: Workers banned from striking for 12 months after lockout</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Story: On 8 December 2020, the mine management and the National Union of Mineworkers (NUM) reached an agreement, suspending the lockout which the employer resorted to after workers went on a strike. However, workers claimed they were issued with final written warnings restricting them from taking part in a strike for the next 12 months. They were also forced to abandon their demands. [Eyewitness News, 08/12/2020, "Modiwka mine workers called back to work after being locked out": <a href="#">ewn.co.za</a>] [Eyewitness News, 08/12/2020, "Num affiliated workers locked out at Anglo Platinum's modikwa mine": <a href="#">ewn.co.za</a>]</li> </ul>
E(6).1	The Company has responded publicly to the allegation	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: Public response: Anglo Platinum has publicly defended its decision to lock out hundreds of its employees affiliated to the NUM at its Modikwa operations. The company said it took the decision in the interest of the safety of its employees and to safeguard their jobs. Anglo-American Platinum said the employees who went on a second strike in the space of a month breached a pre-existing agreement with the NUM that was reached through CCMA mediation after a strike in November. The company also said there was no legal basis for the workers' demand to be paid a lump sum of R16,100. [Eyewitness News, 08/12/2020: <a href="#">ewn.co.za</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company responded in very general terms and did not address the allegation of sending final written warnings restricting workers from taking part in a strike for the next 12 months. [Eyewitness News, 08/12/2020: <a href="#">ewn.co.za</a>]</li> </ul>
E(6).2	The company has investigated and taken appropriate action	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>• Not Met: Engaged with stakeholders: The company engaged with the National Union of Mineworkers reaching an agreement to suspend the lockout. However, the striking workers were forced to abandon their demands and there is no evidence that the company engaged with them to understand the causes that led to the violation of FoA/CB rights. [Eyewitness News, 08/12/2020: <a href="#">ewn.co.za</a>]</li> <li>• Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: There is no evidence the company has implemented improvements or reinforced its management system to avoid such human rights impacts in the future.</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(6).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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>• Not Met: Provided remedy: There is no evidence suggesting that the company provided remedy to the affected stakeholders.</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(7).0	Serious allegation No 7		<ul style="list-style-type: none"> <li>• Area: Health &amp; Safety</li> <li>• Headline: Victims and their families still await compensation and answers after 8 years since the collapse of the Anglo American port in the town of Amapá</li> <li>• Story: The collapse of the Anglo American mining company's port in March 2013 left six employees dead and interrupted the economic development of the entire region. Families of the victims and residents of the municipality are still fighting for redress. The Amapá Public Ministry (MP) denounced Anglo and four company directors for the deaths of workers and environmental crimes that occurred after the collapse. A report by the Technical and Scientific Police of Amapá (Politec) indicated that the lack of adequate containment structures along the shore of the port terminal was the main cause of the collapse. The company contested the report and presented its own findings alleging "natural causes". Relatives of the dead workers denounce the concealment of the accident and claim that another landslide had happened a month earlier. According to reports, this accident that preceded the port collapse was covered up by Anglo.</li> </ul> <p>The families of the victims received compensation from the company, but the amount was not disclosed. However, the relatives are fighting for a lifetime</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>pension from Anglo for the children of the dead employees. After intense negotiations, only an educational agreement was signed to guarantee payment for the children's studies.</p> <p>In 2020 the local public prosecutor's office filed a criminal proceeding against the company. According to this complaint, Anglo American had knowledge of previous incidents that caused soil instability in 1993.</p> <p>In 2013, months after the incident the Indian Zamin Ferrous took over the Anglo enterprise. [A Publica, 20/01/2021, "Mining causes death of workers and misery in the Amazon": <a href="http://apublica.org">apublica.org</a>] [Business and Human Rights Resource Centre, 23/02/2021, "Brazil: victims and family members are still waiting for the compensation and answers after 8 years of the collapse of Anglo American's port in Amapa Municipality": <a href="http://business-humanrights.org">business-humanrights.org</a>]</p>
E(7).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In the days after the incident, press sources cite a statement by Anglo American indicating that 'The accident on Thursday night in the Port of Santana killed three workers whose bodies were recovered from the river by divers who continue searching for three others still missing' and that 'The cause of the accident is being investigated'. [Reuters, 30/03/2013, "Fatal Brazil pier accident halts Anglo American iron ore shipments": <a href="http://reuters.com">reuters.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Detailed response: In its initial response the company addressed the accident and the number of victims. [Reuters, 30/03/2013: <a href="http://reuters.com">reuters.com</a>]</li> </ul>
E(7).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: In a response published by the Business and Human Rights Resource Centre the company states that it has 'carried out studies with professionals from respected and independent institutions in Brazil and abroad, such as the University of Sao Paulo (USP), PUC-Rio, Federal University of Rio Grande do Sul and the University of Toronto, in Canada.' However, this does not demonstrate engagement with affected stakeholders.</li> </ul> <p>A Publica reports that an agreement was formed between the Company and relatives of victims, however, there is no indication that this included an investigation into the causes of the event. [Business &amp; Human Rights Resource Centre, 21/02/2021, "Repostas da Anglo American": <a href="http://business-humanrights.org">business-humanrights.org</a>] [A Publica, 20/01/2021: <a href="http://apublica.org">apublica.org</a>]</p> <ul style="list-style-type: none"> <li>• Met: Identified cause: The Company states that "all these studies indicate that the accident did not involve any cause for which the company could be held responsible. It was caused by a type of soil, the occurrence of which was , until then, unknown in the southern hemisphere and which gave way though natural causes."</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(7).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provided remedy: The Company has provided remedy based on agreements with the state authorities and relatives of the workers killed. [A Publica, 20/01/2021: <a href="http://apublica.org">apublica.org</a>] [Business and Human Rights Resource Centre, 21/02/2021: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: The families of the killed workers are not considering the remedy to be satisfactory according to the report by A Publica. [A Publica, 20/01/2021: <a href="http://apublica.org">apublica.org</a>]</li> <li>• Met: Remedy delivered: The Company has commenced paying compensation in the form of health and dental plans. It has further deposited in court the amount agreed for the municipalities affected. [A Publica, 20/01/2021: <a href="http://apublica.org">apublica.org</a>] [Business and Human Rights Resource Centre, 21/02/2021: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not Met: Independent remedy process used</li> </ul>

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