

Group Policy: The Social Way

Overview: Who we are

At Anglo American, social performance is the way we want to live our company values with our stakeholders. It encompasses our interactions, actions and outcomes with respect to communities and other local stakeholders in areas affected by our activities. We recognise that social performance is essential not only for achieving our strategic business objectives but also to preventing harm and fostering an environment in which communities impacted by our operations can prosper sustainably. Through effective social performance management, we seek to support responsible resource development, meet regulatory requirements, build trust and maintain our long-term licence to operate.

This Policy states and affirms Anglo American's commitment to aligning with international standards and good practice for social performance management to:

- Meaningfully engage with affected and interested stakeholders;
- Avoid, prevent and, where necessary, mitigate and remediate adverse *social impacts*; and
- Identify and optimise opportunities to generate stakeholder value.

Vision

Anglo American's vision for social performance is to prevent and mitigate adverse *social impacts* while creating lasting, positive outcomes for local communities based on a shared vision of development. We aim to deliver long-term stakeholder value and strengthen our position as the preferred partner for those affected by our current and future operations.

Our work is based on respect for the rights of community members and external stakeholders.

We comply with the Social Way Standard and other Group Standards, Policies and Procedures to support implementation of this Policy.

Italics are used to indicate words that are defined or explained for the purpose of this Policy (refer to the section on Key Terms).

Our Principles: How we Manage Social Performance

Management of Social Performance

To achieve our vision for social performance, we apply the following.

Leadership and Culture

We expect our Business Leaders, General Managers, Functional Managers and Supervisors to embody Anglo American's *Purpose* and *Values* in their work both inside the company and when engaging with communities and stakeholders.

All staff have a responsibility to integrate social performance into their work, where relevant, and to act on potential or actual *social impacts* and impacts on community rights linked to their activities.

All individuals acting on behalf of Anglo American are expected to conduct themselves with professionalism, respect, and integrity always and under all circumstances. This includes exercising sound judgment, being mindful of the impact of one's actions and upholding our Values — especially in challenging or high-pressure situations.

Integration

Social performance is a core element and an enabler of our business strategy and management processes. It is embedded into strategic planning for the lifecycle of our assets and in the management of our operations. Accountabilities and responsibilities for social performance management are assigned at all levels of the business to ensure an integrated, consistent approach and to deliver effective performance.

Cross-functional approach

Social performance is a shared, cross-functional responsibility. All employees, contractors, and business partners are accountable for upholding Anglo American's social performance commitments. Functions are expected to work collaboratively to identify, respond to and take accountability for potential impacts on external stakeholders associated with their work.

Continuous Improvement

We are committed to using monitoring and evaluation to assess the effectiveness of our social performance. We use monitoring and evaluation to drive continuous improvement in how we manage social impacts and risk, engage with communities, and deliver socio-economic development. We review internal plans to continuously seek opportunities to improve synergies between business and stakeholder expectations and optimise outcomes for communities and the site.

Human Rights

We shall uphold the principles of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and shall integrate respect for human rights—particularly the rights of communities affected by our operations—into all relevant aspects of our work, including:

- recognising and addressing the specific vulnerabilities of individuals and groups, regardless of gender, age, ethnicity, or social status,
- meaningful engagement to deliver ongoing human rights due diligence,
- ensuring equitable access to remedy, and
- taking proactive measures to avoid the infringement of individual and collective rights.

Respect for human rights is a non-negotiable obligation and cannot be offset by positive impacts in other areas. It applies not only to the outcomes we deliver, but also the way we conduct our work.

Stakeholder Engagement

We are committed to proactive, respectful, and meaningful engagement with stakeholders affected by or interested in our operations, to foster mutual understanding, collaboration, and mutual benefit.

Stakeholder engagement shall be conducted through a process of informed consultation and participation, ensuring stakeholders have access to relevant information and the opportunity to contribute to decisions that may affect them.

Social Performance Impact and Risk Management

The implementation of the Social Way is grounded in the impact and risk context of each operation and site. We shall ensure that our management of *social impacts* and risks is responsive to evolving conditions and aligned with stakeholder expectations.

A proactive, risk-based approach shall be applied, prioritising the prevention of adverse impacts. In doing so, we adopt a zero-harm mindset and apply the mitigation and control hierarchy: eliminate where possible, avoid where elimination is not feasible, minimise residual impacts, mitigate unavoidable effects, and remediate where harm has occurred.

Where Anglo American's activities may cause adverse impacts, we seek to establish transparent and collaboratively defined agreements with impacted communities. In particular, this may be relevant for impacts arising from resettlement, displacement and management of cultural heritage.

Grievance and Remedy

We are committed to addressing stakeholder concerns and *grievances* in a manner that is fair, transparent, predictable, and undertaken in good faith, in accordance with the principles of the UNGPs.

We shall take necessary steps to prevent the recurrence of *grievances* by learning from *grievances* and implementing corrective and preventative measures to strengthen systems, enhance performance and maintain stakeholder trust.

We seek to resolve *grievances* to the satisfaction of the complainant and commit to providing effective access to remedy for those adversely affected by our operations.

Socio-Economic Development

We contribute to the socio-economic development of the communities and regions where Anglo American operates. This contribution is realised through core business activities—including local employment, procurement, and tax payments—as well as through targeted and sustainable socio-economic development initiatives.

We seek to enhance our positive social impacts and act as a catalyst for development by working with external stakeholders, based on a mutual understanding of one another's roles and aligned with our commitments, to support communities in achieving their development aspirations.

Indigenous Peoples

We respect the rights, interests, culture and perspectives of Indigenous Peoples¹ consistent with the UN Declaration on the Rights of Indigenous Peoples. We recognise and respect the special connections that Indigenous Peoples have with land, water and natural resources. We aim to work in partnership with Indigenous Peoples to deliver mutual benefit and support them in achieving their development aspirations, based on agreed roles for all parties.

¹ While there is no universally accepted definition for Indigenous Peoples, the Anglo American Social Way Toolkit provides guidance on criteria for identifying Indigenous Peoples, available here [Task 1 – Confirm presence of indigenous peoples – Anglo American Social Way toolkit](#)

We are committed to:

- **Respect for Self-Identification:** We recognise and respect the right of Indigenous Peoples to self-identify and shall engage with them accordingly.
- **Respect for Collective Rights:** We acknowledge and uphold the collective rights of Indigenous Peoples, including their rights to land, territories, resources, culture, governance, and decision-making.
- **Voluntary Isolation and Initial Contact:** We respect the right of Indigenous people to not engage, and in this instance, we will not undertake business activities that could affect their land, territories or resources.
- **Collaboration and Partnership:** We seek to engage in a way that is meaningful and culturally appropriate, and to collaborate with Indigenous Peoples to manage impacts and deliver benefits aligned with their own development aspirations.
- **Free, Prior and Informed Consent (FPIC):** We shall consult in good faith with Indigenous Peoples and follow the principles of FPIC to seek and maintain agreements with Indigenous Peoples, throughout the lifecycle of the site, reflecting consent for the management of impacts on their rights or interests². This will be done in advance of decision making, based on full disclosure of relevant information and in respect of Indigenous Peoples' right to self-determination. In situations where, despite good faith efforts, FPIC agreement is not achieved, we shall seek to understand the reasons why and continue engaging respectfully to address concerns. Our position is that relevant new operations and capital projects should not proceed without this consent. Accountability for any decision to proceed with an activity, despite residual opposition, sits with the Executive Leadership Team (Investment Committee) and the Board. Such a decision will be based on a clear justification that aligns with legal requirements and international standards and be premised on our continued commitment to mitigate impacts, provide remedy, and maintain long-term respectful relationships with affected Indigenous Peoples.

Land Access, Resettlement & Displacement

We manage land access, displacement and resettlement in a manner that respects the rights and dignity of affected individuals and communities. When displacement and resettlement cannot be avoided, we shall undertake meaningful engagement and good faith negotiations to seek agreement with affected people on resettlement plans and implementation. Through such agreements, we shall aim to restore or improve the livelihoods and well-being of affected people. We avoid non-negotiated or imposed resettlement. Resettlement shall be treated as an involuntary process that may result in significant social and economic impacts and will be undertaken in compliance with International Finance Corporation Performance Standard 5.

All resettlement projects (regardless of cost) shall be treated as Capital Projects and accountability for decision making on resettlement planning and approval to start implementation sits with the Executive Leadership Team (Investment Committee).

² [This includes impacts on Indigenous Peoples land, territories and resources; traditional livelihoods; and critical and intangible cultural heritage.](#)

Cultural Heritage

Anglo American will not explore or operate in World Heritage sites³, and will avoid impacts on Indigenous People's critical cultural heritage⁴.

We work with local communities and the custodians of the land on which we operate to identify heritage resources of value to them. We work collaboratively to protect those cultural heritage resources while seeking to support affected communities to enjoy its full value across the lifecycle of the site.

Monitoring and Reporting

Reporting and Analysis

Local business leaders, General Managers, Functional Managers and Operations management are required to monitor, report and analyse performance, and implement improvement actions for *social performance* in their area of responsibility.

Business and Functional *social performance* managers provide reporting, measurement, analysis and suggestions to management teams for improvement on a predefined frequency.

The Chief Strategy and Sustainability Officer and Senior Vice President Sustainability and Social Impact are responsible for informing the Chief Executive, Executive Leadership Team and the Anglo American Board of Directors of our performance in relation to expectations and outcomes for *social performance* management.

Assurance

The Anglo American Risk, Assurance and Governance (RAG) Policy explains the role of risk management and assurance activities in supporting the governance of Anglo American, to ensure that all roles working together collectively contribute to the creation and protection of value and to the prioritised interests of stakeholders. Local business leaders, General Managers and Functional Managers are required to ensure an effective "Three Lines" model is implemented for the Social Way in accordance with the RAG Policy. Assurance helps ensure that our commitments, both internal and external, are delivered at every level of the Company.

Alignment with External Standards

We are committed to upholding internationally recognised good practice standards. The Social Way framework is designed so that it is aligned to and will continuously improve its practices in accordance with the following standards and policy frameworks:

- **International Finance Corporation (IFC) Performance Standards:** We shall follow the IFC Performance Standards on Environmental and Social Sustainability as a benchmark for identifying and managing social risks and impacts.⁵
- **Voluntary Principles on Security and Human Rights (VPSHR):** We adhere to the highest international standards with regard to respect for human rights in the application of our

³ <https://www.icmm.com/en-gb/our-work/nature/world-heritage-sites>

⁴ <https://www.icmm.com/en-gb/our-principles/position-statements/indigenous-peoples>

⁵ <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

security arrangements, whether public or private, and ensure these are implemented in alignment with VPSHR requirements.⁶

- **Global Industry Standard on Tailings Management (GISTM):** We shall adhere to the GISTM to ensure the safe and socially responsible management of tailings storage facilities, including the integration of social considerations into risk management, stakeholder engagement, and emergency preparedness.⁷
- **International Council on Mining and Metals. (ICMM) Performance Expectations and Position Statements:** We shall implement the ICMM Performance Expectations.⁸ and Position Statements.⁹
- **United Nations Guiding Principles on Business and Human Rights (UNGPs):** We shall respect internationally recognised human rights, avoid infringing on the rights of others, and provide access to effective remedy where adverse impacts occur, in alignment with the UNGPs.¹⁰

Further guidance, breaches and reporting

Further guidance

This Policy is supported by the Social Way Standard, Social Way Toolkit, training and other resources, available through our Policy Hub and intranet sites. The Social Way Policy is implemented through the Social Way Standard, which defines Anglo American's minimum mandatory requirements for *social performance*. The Social Way Toolkit provides guidance on how to meet the requirements outlined in the Standard. Collectively, the Social Way Policy, Standard, Toolkit and Assurance make up the Social Way Framework.

There are many interdependencies between social performance and other areas. The Social Way Policy should therefore be considered with reference to other relevant Group policies, including:

- Climate Change Policy
- Human Rights Policy
- Enterprise Risk Management Policy
- Safety, Health and Environment Policy
- Security Policy

Reporting suspected breaches

Our people must report any breaches, or potential breaches, of this Policy of which they become aware, to relevant internal functions.

Our YourVoice facility provides a confidential and secure means for our people, contractors, suppliers, business partners and other external *stakeholders* to report and raise concerns about conduct which is contrary to our Values, Code of Conduct and policies. For more information, go to: www.yourvoice.angloamerican.com

⁶ <https://www.voluntaryprinciples.org/>

⁷ <https://globaltailingsreview.org/global-industry-standard/>

⁸ <https://www.icmm.com/en-gb/our-principles/mining-principles/mining-principles>

⁹ <https://www.icmm.com/en-gb/our-principles/position-statements/indigenous-peoples>

¹⁰ <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

We co-operate with the legitimate enquiries of relevant law enforcement agencies, sectoral regulators, national courts and other fora with powers to enforce the laws relevant to this Policy.

Consequences of breaches

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

Key terms

Defined for the purposes of this Policy.

Grievance

A specific allegation or complaint relating to the site, its policies, activities, real or perceived impacts or the behaviour of its employees or contractors. Grievances are an expression of dissatisfaction with the company on the part of *stakeholders*. Grievances can be expressed through physical action (e.g. protests, road blockages, land invasions); verbally (during discussions with site staff, etc.); or in writing.

‘Social Impact’

Changes to the lives, livelihoods, health or well-being of external *stakeholders* directly or indirectly caused by a site. Impacts can be positive or negative. Impacts can be cumulative - cumulative impacts are the combined effects of multiple projects/activities in an area.

Social Performance

Encompasses our interactions, activities and outcomes with respect to local communities and other local stakeholders in those areas affected by our mining activities. Social performance is not philanthropy for reputational purposes nor is it focused solely on those activities required to satisfy local legal or regulatory requirements. Rather, social performance is essential for achieving our strategic business objectives while ensuring the Anglo American Group avoids harm and creates an environment in which communities impacted by our operations can prosper sustainably.

Stakeholder

Interested or affected parties, including neighbouring communities and businesses; local, regional and national governments (i.e. the authorities); traditional leaders; employees, contractors, and suppliers; non- governmental organisations (NGOs) and community-based organisations (CBOs); media groups; other Anglo American operations and Anglo American corporate centre.

About the Policy

Scope and application

This is a Group Policy that applies to Anglo American globally, unless any aspect of the Policy is not permitted by local law or regulation. Our people have a duty to uphold and comply with the laws of the countries and jurisdictions in which they operate.

This Policy sets out Anglo American's position in respect of areas within its scope. It is not, and is not intended to be, comprehensive and should not be regarded as legal advice. Appropriate guidance on this Policy, relevant laws and their application to any particular situation should always be sought.

This Policy applies to all directors, employees, contractors and representatives of entities in which Anglo American plc has a direct or indirect interest of greater than 50% unless notified to the contrary, and/or unless any aspect of the Policy is not permitted by local law or regulation.

Group Terminology and Responsibility

In this Policy, and any related procedures or standards, references to "Anglo American", the "Anglo American Group", the "Group", "we", "us", and "our" are to refer to either Anglo American plc and its subsidiaries and/or those who work for them generally, or where it is not necessary to refer to a particular entity, entities, or persons. The use of those generic terms is for convenience only and is in no way indicative of how the Anglo American Group, or any entity within it, is structured, managed or controlled.

Anglo American subsidiaries, and their management, are responsible for their own day-to-day operations, including but not limited to securing and maintaining all relevant licenses and permits, operational adaptation and implementation of Group policies, management, training and any applicable local grievance mechanisms.

Anglo American produces group-wide policies and procedures to ensure best uniform practices and standardisation across the Anglo American Group but is not responsible for the day-to-day implementation of such policies. Such policies and procedures constitute prescribed minimum standards only. Group operating subsidiaries are responsible for adapting those policies and procedures to reflect local conditions where appropriate, and for implementation, oversight and monitoring within their specific businesses.

Prevailing language

The English language version of this Policy shall be controlling in all respects and shall prevail in case of any inconsistencies with translated versions, if any. Any other language versions of this Policy are provided for convenience only.

Non-Managed Sites

Where Anglo American does not have direct management control of a site but is associated with it via a business relationship, such as a joint venture, Anglo American will use its influence to promote the adoption of social performance standards aligned with this Policy. At a minimum, Anglo American will expect that such sites comply with applicable regulatory requirements.

Legal Compliance

Anglo American is committed to full compliance with the laws and regulations of all jurisdictions in which it operates. In instances where there is a discrepancy between domestic legislation and the requirements of the Social Way Policy, the organisation shall strive to uphold the higher standard, provided it does not conflict with legal obligations. This approach ensures both legal compliance and alignment with Anglo American's commitment to ethical and socially responsible practices.