

# GROUP HUMAN RIGHTS POLICY

Version 2

**FOR FURTHER INFORMATION:** CORPORATE OFFICE  
INTERNATIONAL AND GOVERNMENT RELATIONS  
20 Carlton House Terrace, London, SW1Y 5AN, UK  
T +44 (0) 20 7968 8888  
F +44 (0) 20 7968 8637  
[humanrights@angloamerican.com](mailto:humanrights@angloamerican.com)  
[www.angloamerican.com](http://www.angloamerican.com)

© Anglo American plc 2018

All rights reserved.

No part of this publication may be reproduced in any material form, stored in a retrieval system, or transmitted in any form or by any means (electronic, mechanical, photocopying, recording or otherwise) without acknowledgement and the written permission of the copyright owner. Applications for the copyright owner's written permission to reproduce any part of this publication should be addressed to:

Head of Government Relations  
Anglo American  
20 Carlton House Terrace  
London SW1Y 5AN

Tel. +44 (0) 20 7968 8888

Warning: The doing of an unauthorised act in relation to a copyright work may result in both a civil claim for damages and criminal prosecution.

# Anglo American Human Rights Policy

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.

## CONTEXT

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 principles are embedded in a number of our internal Policy documents, including those related to employment practices, exploration, environmental practices, social performance and security.

We accept and support the corporate responsibility to respect human rights and actively seek to avoid involvement with human rights abuses. We aim to identify, assess and minimise potential adverse human rights impacts that we may cause or contribute to, or that are linked to our business, through on-going due diligence and appropriate management, as stated in the Guiding Principles.

We also recognise that our host governments have a duty to protect the human rights of everyone within their jurisdiction. Where it is appropriate and within our power to do so, we also seek to promote the observance of human rights in the countries where we work and will work with states to build capacity in support of that objective.

## DOES THIS APPLY TO ME?

This Policy applies 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.

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.

Accountability for implementation of this Policy lies with the Group Chief Executive and with the Chief Executives of the business units.



## WHAT DO I NEED TO KNOW?

### Respected rights

Our commitment to respect human rights includes recognition of all internationally-recognised human rights, in particular: those contained in the International Bill of Human Rights (which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights); the International Labour Organisation's

Declaration on Fundamental Principles and Rights at Work; and international humanitarian law, where applicable.

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.

As a signatory to the Voluntary Principles on Security and Human Rights (VPSHR), we have made a commitment to maintaining the safety and security of our operations and staff within an operating framework that encourages respect for human rights via any necessary interactions with both public and private security providers.

We commit to address both adverse human rights risks and impacts and to contribute positively to an enabling environment for human rights to be respected. We are also committed to paying special attention to the rights of potentially vulnerable groups.

We recognise that the nature of mining operations, from the earliest stages in the life of our mines, creates the potential for a wide range of human rights risks and we seek to mitigate the risk of any breaches.

As part of our commitment to respect human rights and to a comprehensive approach, we will also undertake appropriate due diligence throughout the lifecycle of mining operations. Where we have caused or contributed to adverse human rights impacts we will contribute to their remediation as appropriate. We will inform and engage appropriately with affected and potentially affected persons on risks, impacts and management measures and keep them involved in monitoring performance.

We will make particular effort to ensure that we engage with those most vulnerable, in particular where they encounter challenges in voicing their opinions or having them heard, and to identify any additional specific measures to avoid, prevent or mitigate impacts on them.



## DELIVERY AND IMPLEMENTATION

We commit to embed this Policy into our corporate culture and practices. Our efforts will be guided by the relevant sections of the Guiding Principles and will include:

- Incorporating ongoing human rights due diligence into relevant business processes as appropriate, such as impact assessments.
- Engaging with relevant, potentially affected stakeholders in assessing and addressing impacts.
- Including human rights-related requirements within contractual arrangements with business partners and host governments as appropriate.
- Collaborating with or providing access to remedy through effective complaints and grievances procedures.

We will continue to play an active and constructive role in relevant human rights-related multi-stakeholder initiatives, including the VPSHR, for which the continued implementation is an important pillar of the human rights approach set out in this Policy.

Anglo American will always comply with applicable laws and respect the rule of law. In situations where there is a conflict between domestic legal requirements and international human rights norms, we shall seek to uphold our company values. In doing so we will consider all options; this may include refraining from new, or exiting from existing, investments in the respective jurisdiction.

## WHAT DO I NEED TO DO?

It is everyone's responsibility to uphold our commitment to show respect for human rights in every aspect of how we do business. This means we must demonstrate care and respect in our interactions with each other and with our stakeholders. It also means we must undertake risk-based due diligence of any new activity or business partner where there is a possibility of adverse human rights impacts arising as a result of that activity or relationship, and also on an ongoing basis in our existing activities. It also highlights the importance of having the courage to report any potential or suspected labour or human rights abuse you may observe in our operations or in those of a business partner.

### Training and communication

Anglo American will communicate 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.

## MONITORING AND REPORTING:

### Monitoring and reporting

The adherence of Anglo American sites to this Policy and the on-going process of human rights due diligence it outlines will be monitored as a component part of wider assessment of social performance that is conducted on an annual basis under the Anglo American Social Way.

Suppliers' and contractors' human rights performance will likewise be monitored as stipulated in their contractual agreements with Anglo American as outlined in the Group's [Responsible Sourcing framework](#).

Any incident identified through the [Speak Up](#) confidential reporting service or the Social Way reporting mechanism that may constitute a potential or actual infringement of human rights will be reported to the owner of the Human Rights Policy as well as to the Board Sustainability Committee.

### Consequences of breach

Employees', contractors' and suppliers' performance contracts incorporate a commitment to Anglo American's Code of Conduct, and by extension an undertaking to maintain adherence to this Policy. We will all be held accountable for our behaviour while working on the company's behalf and action will be taken where the Code or this specific Policy has not been followed. Consequences will depend on how an individual has contravened the Policies in the Code and in what circumstances, and could range from a warning to dismissal.

Where a breach of legislation is proven in this regard, Anglo American also reserves the right to refer the matter to the relevant authorities for further action.

## FURTHER INFORMATION:

### Internal references

- Anglo American Safety, Health and Environment (SHE) Way
- Anglo American Social Way
- Group Equality and Inclusion Policy
- Group Business Integrity Policy
- Group Climate Change Policy
- Anglo American Human Rights framework
- Anglo American Responsible Sourcing framework

### External references

United Nations Global Compact

United Nations Guiding Principles on Business and Human Rights

Voluntary Principles on Security and Human Rights

Universal Declaration of Human Rights

International Covenant on Civil and Political Rights

International Covenant on Economic, Social and Cultural Rights

International Labour Organization (ILO) Fundamental Conventions

If you need any further information or require guidance on reporting on suspected/alleged human rights-related incidents, email [humanrights@angloamerican.com](mailto:humanrights@angloamerican.com) or contact the Government Relations team.

