

Modern Slavery
Statement 2024

Anglo American in Australia



About this Statement

This Statement provides our stakeholders with an account of the approach and actions we took to assess and address modern slavery risks in our operations, business activities and value chain during 2024.

Scope of this statement

This statement is made in accordance with the *Modern Slavery Act 2018* (Cth) (**MSA**), and is the fifth statement Anglo American Australia Limited and its related reporting entities have submitted. It covers the period 1 January 2024 to 31 December 2024, and is made on behalf of the reporting entities listed at *Appendix I*.

The disclosures in this statement apply in relation to all reporting entities and their owned and controlled entities, unless otherwise specified. A table setting out how this statement addresses the MSA reporting criteria can be found at *Appendix II*.

Changes to the related entities

Anglo American Australia Limited submitted a standalone Modern Slavery Statement for the FY20 reporting year, and due to the integrated nature of Anglo American’s global operations, submitted a consolidated Group statement for the FY21, 22 and 23 reporting years. These consolidated Group statements included all related entities of parent company Anglo American Plc.

On 4 November 2024, Anglo American Plc announced the sale of its minority interest in Jellinbah Group Pty Ltd and on 25 November 2024, the sale of its Australian steelmaking coal operations.

Anglo American Australia Limited is the ultimate Australian holding company for the Australian steelmaking coal and corporate companies, except for Anglo Coal (Jellinbah) Holdings Pty Ltd, which has been transferred to a separate holding entity outside of the Anglo American Australia Limited group, but within Australia.

The full statement from Anglo American Plc regarding the sale of the Australian operations is available [at this link](#).

Due to the intended sale of the steelmaking coal operations, relevant Anglo American Plc entities are making a separate statement in accordance with the MSA.

A separate Modern Slavery Statement is also being made by De Beers and its relevant owned and controlled entities pursuant to section 54 of the *UK Modern Slavery Act 2015*, and a further statement is being made by De Beers Canada Inc. pursuant to section 11(1) and 11(2) of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*.

Consultation to prepare this statement

All reporting entities listed at *Appendix I* were consulted in developing this statement, including consultation with relevant company secretaries.

This statement has been prepared in consultation with stakeholders across Anglo American Australia Limited and Anglo Coal (Jellinbah) Holdings Pty Ltd, including procurement, social performance, corporate affairs, legal, human resources, governance, risk and assurance. The consultation process outlined above helped to ensure that the Statement reflects our approach to identifying, preventing, mitigating and accounting for modern slavery risks.

This statement has been prepared through a process of consultation with, and endorsement by, the boards of Anglo American Australia Limited and Anglo Coal (Jellinbah) Holdings Pty Ltd, and signed by Daniel van der Westhuizen, Chief Executive Officer of Anglo American in Australia and Carleigh Andrews, Director of Anglo Coal (Jellinbah) Holdings Pty Ltd.



Dan van der Westhuizen
Chief Executive Officer, Anglo American in Australia



Carleigh Andrews
Director, Anglo Coal (Jellinbah) Holdings Pty Ltd

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Message from the Chief Executive

“ At Anglo American, we are firmly committed to upholding human rights and embedding ethical practices across every level of our Australian operations. Reducing the risk of modern slavery is a fundamental part of that commitment.



As a business with a global footprint, we recognise the influence we hold across our value chains – from the communities where we operate in Central Queensland to the thousands of people connected to us through suppliers, contractors and business partners. Of our suppliers, 98% are based in Australia, with 66% located in Queensland where we operate. We take our responsibility to vet and engage with them seriously.

In 2024, we continued to strengthen our systems and processes to identify, manage and mitigate modern slavery risks within our supply chains. This includes ongoing engagement with suppliers, targeted risk reviews, updated contractual terms and clearer expectations through our self-assessment processes. We’ve also invested in building internal capability to ensure our teams are equipped to identify and respond to potential issues effectively.

In an ever-evolving regulatory landscape, we understand that addressing modern slavery is not a one-off task. It requires sustained attention, honest reflection, and collaboration with others who share our Values. That is why we continue to engage with industry peers, government and our supply chain to develop a deeper understanding of the risks and help drive broader change.

I’m proud of the work our Australian teams are doing to lead with integrity, remain vigilant, and ensure human rights are respected throughout our business. This statement reaffirms our commitment to continuous improvement and to playing our part in eliminating modern slavery for future generations.

A handwritten signature in blue ink, appearing to read 'Dan van der Westhuizen'. The signature is stylized and fluid, with a large initial 'D'.

Dan van der Westhuizen
Chief Executive Officer, Anglo American in Australia

Introduction

Anglo American is committed to respecting and upholding internationally recognised laws and standards for the protection of human rights.

Everyone at Anglo American is guided by our clear Purpose: **we are re-imagining mining to improve people’s lives.** The foundation to deliver our Purpose is our company Values, which are at the core of our way of working.



Safety

Safety

We give our all to eliminating injuries because we value life and are unconditional about safety, health and well-being at work and at home.



Care and Respect

Care and Respect

We believe in humanity and therefore show care and respect for all people and will not turn a blind eye to what is wrong.



Integrity

Integrity

We always act honestly, fairly, ethically and transparently.



Accountability

Accountability

We own our decisions, actions and performance, and are empowered to make changes and learn from our experiences.



Innovation

Innovation

We challenge assumptions, seek other perspectives and pursue innovative opportunities to transform our business



Collaboration

Collaboration

We collaborate with colleagues and stakeholders towards a common Purpose and to achieve exceptional outcomes.

Guiding principles

Anglo American is committed to the highest standards of ethical conduct, and protection of human rights. Our approach to modern slavery risk management is guided by the following principles.

Respecting Human Rights

We respect and uphold the inalienable human rights of all persons with the potential to be impacted by our operations and supply chain. Our approach is guided by the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labor Organisation’s Declaration on Fundamental Principles and Rights at Work.

All forms of modern slavery, including forced labour, debt bondage, indentured servitude, human trafficking and the worst forms of child labour are considered a serious breach of these rights.

Transparency and Accountability

We are committed to ensuring effective governance and oversight of our efforts to assess and address modern slavery, child labour and other human rights-related risks.

We are proud to be advocates for what we believe is right and to work as partners to solve complex problems through our public policy engagement.

Anglo American in Australia maintains membership to key industry bodies through which we actively engage and advocate for policies that support sustainable, thriving communities in our areas of operation. Through these partnerships, we commit to compliance with recognised international standards for ethical business conduct and voluntarily report on our performance against these commitments. Such memberships include:

- United Nations Global Compact Australia (UNGCA)
- Minerals Council of Australia (MCA), and
- Queensland Resources Council.

Our participation in industry bodies is guided by our Government and International Relations Policy.

Risk-based Due Diligence

We take a proactive, risk-based approach to our due-diligence practices by regularly assessing and monitoring modern slavery risk across our operations and supply chains.

Prospective suppliers must satisfy screening and due diligence checks before on-boarding as an approved supplier, and must produce evidence of ethical business practices when called upon from time-to-time, including as part of an audit conducted by Anglo American or its appointed third-party.

Supplier and Contractor Engagement

We work collaboratively with our suppliers and business partners to promote ethical business practices, and set clear expectations for business conduct by:

- Incorporating modern slavery clauses in all contracts and procurement policies.
- Requiring suppliers to agree to adhere to our Responsible Sourcing Standard for Suppliers, which includes specific obligations related to protecting safety and health, protecting our environment, respecting labour and human rights, contributing to thriving communities, and conducting business fairly and with integrity.
- Requiring suppliers of high-risk goods or services to complete a self-assessment questionnaire using the Informed365 platform for detailed modern slavery risk assessment, and where relevant, requiring suppliers to complete corrective action plans to ensure ongoing compliance with the Standard.

Education and Awareness

We provide regular training for employees, contractors and suppliers to support them to effectively identify, assess, and manage modern slavery risks.

Training is tailored to job roles, and targeted particularly to those whose roles have the greatest potential to positively influence company human rights performance, especially those involved in procurement and supply, human resources and site operational roles.

Grievance management and access to remediation is a core component of our approach to salient human rights issues, and is covered in detail at [Access to Remediation](#).

Summary

We have made positive progress towards achieving commitments for 2024, that we published in our 2023 Modern Slavery Statement.

2024 focus area (as reported in 2023)	Status
Progressing our gap analysis of our modern slavery risk management and identify priorities for further action.	Ongoing
Updating the supplier self-assessment questionnaire tool to automate feedback to suppliers	Ongoing
Continuing to develop and launch human rights training modules (including in relation to modern slavery) tailored to specific business functions	Ongoing
Refining operational due diligence guidance, with human rights considerations continuing to be integrated into operational and functional plans	Ongoing
Continuing to engage with our stakeholders on human rights issues, such as modern slavery	Ongoing
Commencing development of a human rights monitoring and accountability framework	On hold*
Continuing engagement with the sector to promote consistent approaches to supplier engagement	Ongoing
Continuing supplier capacity development programs aimed at increasing supplier awareness, and promoting practical controls that suppliers can implement to mitigate modern slavery risk.	Ongoing

With the acceleration of Anglo American Plc’s strategy and sale of the steelmaking coal portfolio, some activities planned for 2024 were postponed. These activities will be reviewed as part of the broader organisational planning post-sale.

2024 Highlights

Policy Updates

We updated our Responsible Sourcing Standard for Suppliers, reinforcing expectations for ethical business conduct by suppliers. The updated standard outlines performance criteria for suppliers to identify, assess and address modern slavery risks in our value chain, especially in relation to the elimination of all trafficked, forced, bonded and involuntary prison labour.

Towards Sustainable Mining (TSM)

In 2022, we commenced the implementation of Towards Sustainable Mining (TSM) with a pilot at our Capcoal Complex (Capcoal open cut and Aquila underground mines) near Middlemount.

TSM is a globally recognised accountability framework which supports minerals companies to evaluate, manage and communicate site level sustainability performance. TSM is administered by the Minerals Council of Australia, and includes a process of self-assessment, external verification and public reporting.

In 2023, we:

- completed the self-assessment and external verification of the Preventing Child and Forced Labour Protocol¹ and
- as part of the TSM pilot we undertook human rights due diligence assessment as part of the TSM Responsible Sourcing Supplement.

We are proud to have continued with the roll-out of TSM across our other steelmaking coal operations, with our pilot extending to include Dawson Mine in 2024.

Improved Sourcing Processes

We established a Supply Chain Process Improvement Working Group, focused on the performance steelmaking coal portfolio. This working group conducted an internal review of supply chain policy and procedure to ensure that processes remained fit-for-purpose and supported the effective management of business risk though supply chain practices. The working group oversaw the mapping of Group-level salient risks (safety and health of employees and contractors, environmental management, impacts on communities, security and human rights and labour rights) against categories of spend under management. Combined with outcomes of the 2022 Modern Slavery Hotspot Analysis, the working group developed and implemented an updated suite of sourcing templates and guidelines.

¹ Although compliance with the requirements of the Preventing Child and Forced Labour protocol do not satisfy the requirements of the Australian Modern Slavery Act, it can be used to support a company’s modern slavery due diligence activities (TSM Preventing Child and Forced Labour Protocol (2022), p. 5.

Our operations

Our high-quality steelmaking coal assets, located in Queensland’s Bowen Basin, produce premium quality hard coking coal for our customers in the steelmaking industry. We are the world’s third largest exporter of steelmaking coal and our operations serve customers throughout Asia, Europe and South America.

Our steelmaking coal business includes two open cut and three underground steelmaking coal mines being: Grosvenor, Moranbah North, Capcoal, Aquila and Dawson.

Our year in review

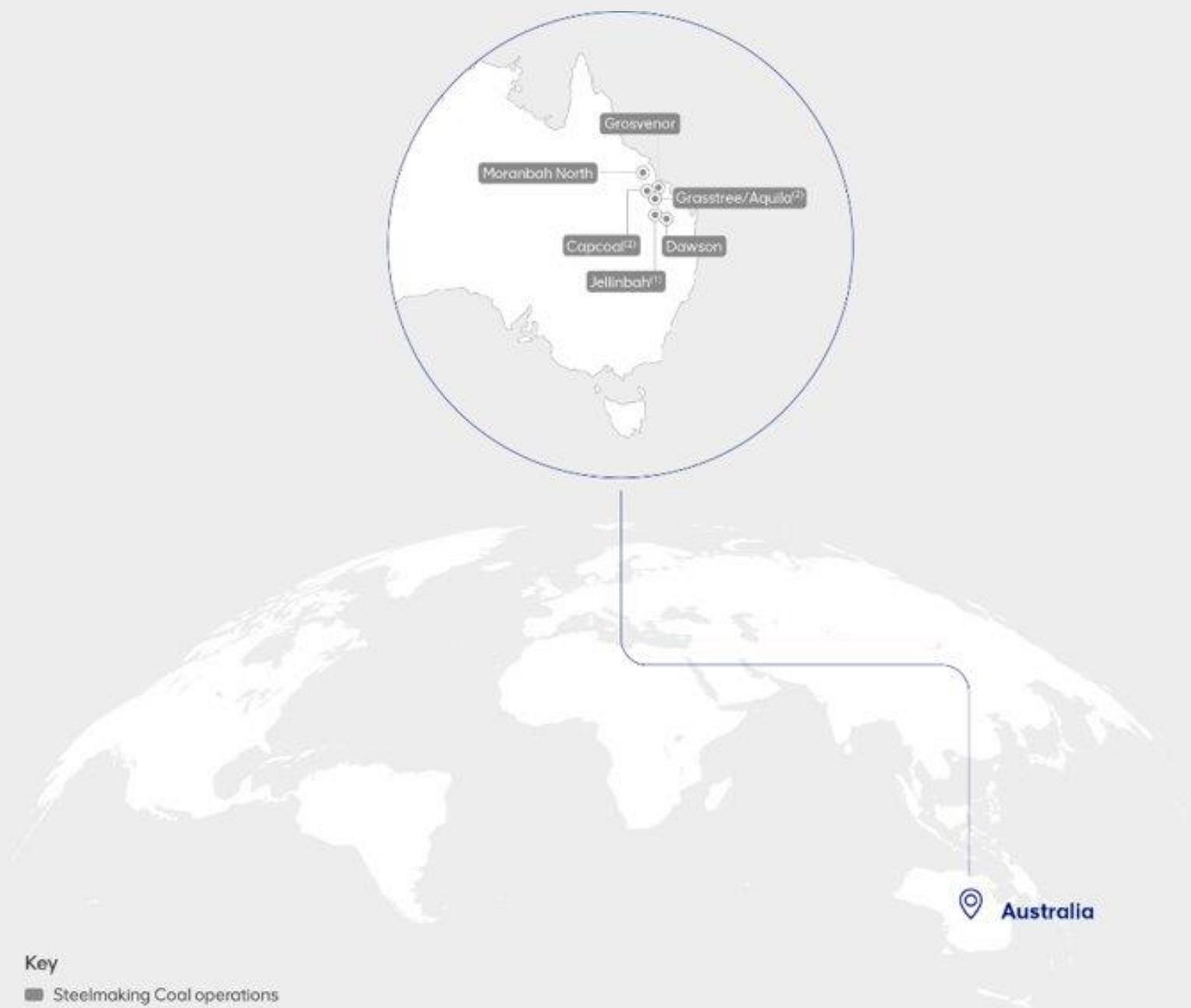
Financial & production highlights (\$US million)	2024	2023
Production volume (Mt)	14.5	16.0
Underlying EBITDA	924	1,320
Underlying EBIT	480	822
Capital expenditure	468	619
Attributable return on capital employed (ROCE)%	15%	27%



3311
employees of Anglo American
in Australia in 2024

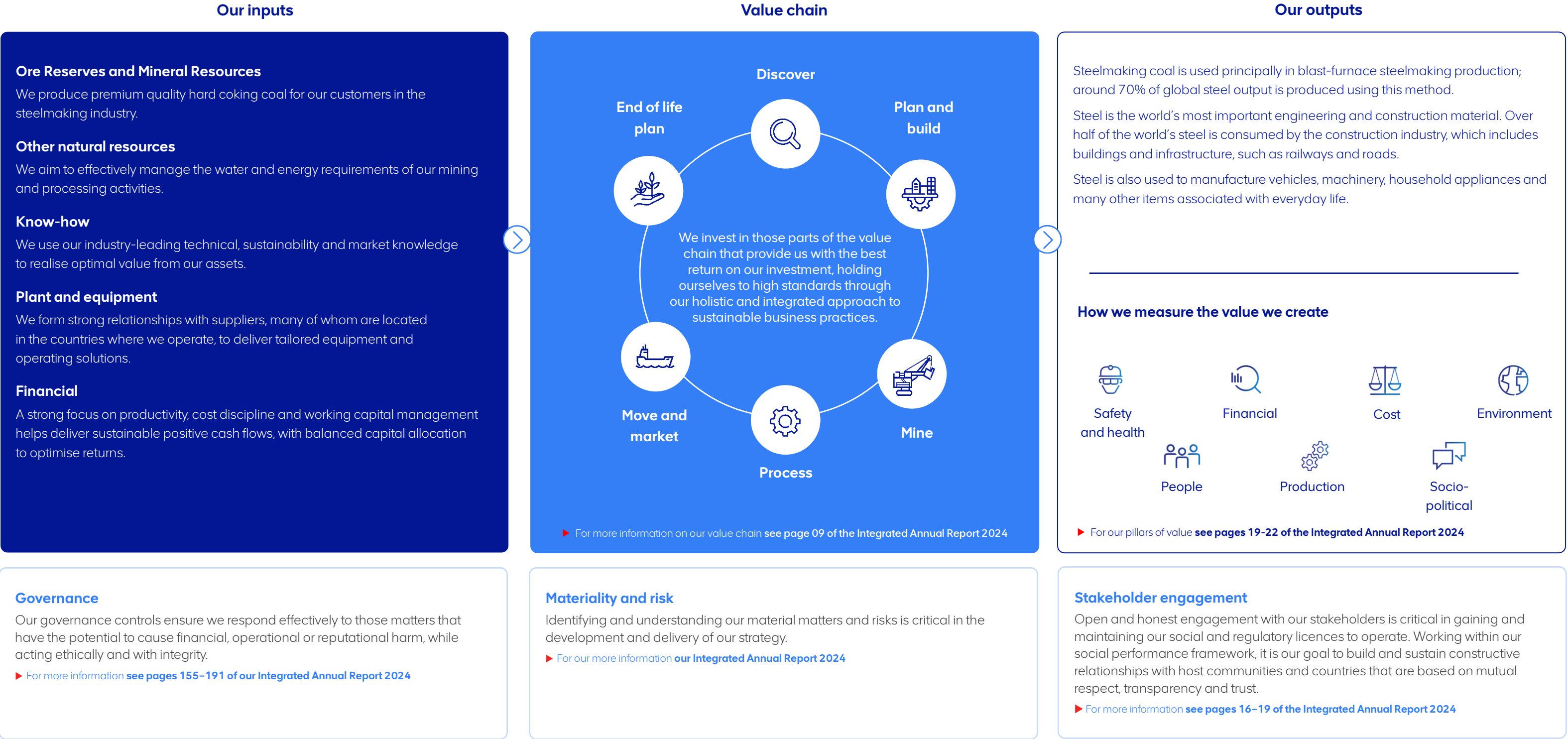


\$652m
wages and benefits paid in
2024



Our business model

Anglo American draws upon a number of key inputs that, through targeted allocation, development, extraction and marketing, create sustainable value for our shareholders and our diverse range of stakeholders.





Embedding our
commitments

Embedding our commitments

As a large mining company with long and often complex supply chains, we are conscious that there is a range of potential modern slavery and child labour risks across many parts of our business model – and that these may change over time in our rapidly changing business context.

Modern slavery, including the worst forms of child labour

Describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

Child labour and other dangerous or sub-standard working conditions

Child labour is any work that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development. Dangerous or substandard working conditions include work that is unsafe or inappropriately compensated.

Decent work

Workers’ rights are respected and there is no child work.

Examples include:

- Children trafficked to work in factories in unsafe conditions.
- Workers trapped in their employment, with employers having confiscated identity documents, such as passports.

Examples include:

- Workers are not fairly paid and do not receive some or any of their entitlements.
- Children are required to leave school to work and to support their families.

Examples include:

- Workers are paid fairly, including for any overtime.
- The workplace is safe and workers are provided with appropriate training and personal protective equipment.

Assessing our risk of involvement in modern slavery

In assessing our risk of involvement in modern slavery and child labour, we use the continuum of involvement set out in the UN Guiding Principles on Business and Human Rights (UNGPs). This continuum of involvement guides our understanding of how we could potentially be involved in modern slavery and child labour, and how we should respond.

	Cause	Contribute	Directly linked
Description	A mining company may cause modern slavery or child labour in its operations where its actions or omissions directly result in modern slavery practices occurring.	A mining company may contribute to modern slavery or child labour in its operations or supply chain through its actions or omissions, including where these facilitate or incentivise modern slavery or child labour in its supply chain.	A mining company’s operations, products or services may be directly linked to modern slavery or child labour through its business relationships.
Example	A mining company (A) knowingly exploits contracted workers that it hires to support the operation of a mine site, including confiscating their identity documents, preventing them from leaving the site for extended periods without exception, and requiring them to work excessive hours.	A mining Company (B) knowingly requires its site management service provider (C) to reduce costs to a level that could only be met by exploiting workers and does nothing to mitigate the situation.	A mining company (D) orders workwear from a wholesaler (E) which was made by a third supplier (F) using modern slavery in its factories. (D) has a modern slavery clause in its contracts with (E).
Response	- Stop or prevent the impact. - Provide for or cooperate in remediation.	- Stop or prevent the contribution. - Use leverage to mitigate any remaining impact as far as possible. - Provide for or cooperate in remediation.	- Build or use leverage to prevent and mitigate the impact. - Be able to show ongoing efforts to mitigate the impact. - Potentially take a role in remediation. - Decide whether to stay in the business relationship.

In line with the UNGP continuum of involvement, we assess we are mostly likely to be directly linked to modern slavery in the hotspots identified through our 2022 analysis (see section below for more details). We recognise that if our policies, processes, and other controls outlined in this statement are not effective, this could potentially increase our risk of causing or contributing to modern slavery and child labour.

Governance

Oversight of our policies relating to human rights, including modern slavery and child labour, sits with the Executive Committee.

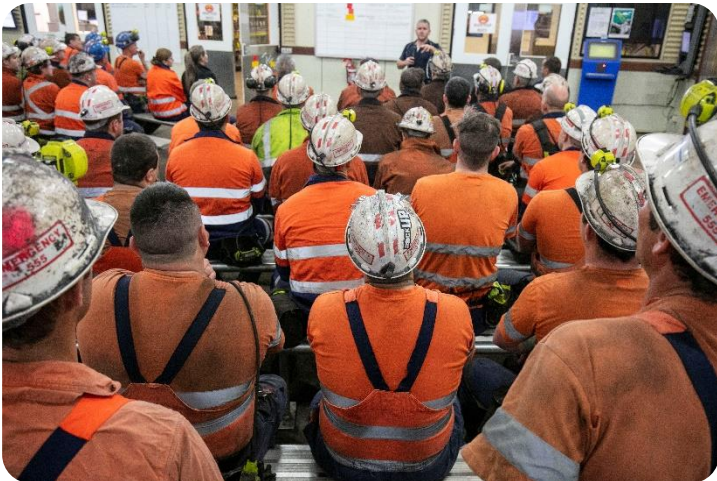
Overall accountability for human rights lies with the Social Performance Function, with other functions (notably, People & Organisation and Supply Chain) and businesses (including Marketing) playing leading roles in managing risks in their respective areas of the business.

Training and capacity building

In 2024, we developed and launched a new online training module on the Code of Conduct, addressing our commitment to ethical business conduct, human rights and labour rights, including modern slavery.

The module covers core elements of the Code of Conduct, including how our Values can be applied in action and how the decision-making tree can be used to navigate difficult situations, including human rights related issues. To ensure compliance with training, this was also the first year failure by an employee to complete the mandatory training would result in a 5% bonus reduction.

Further, our marketing teams received human rights training provided by an expert third-party advisory firm, outlining salient human rights risks and issues related to the marketing function, and the approaches in place to manage these salient human rights issues



99.8%
of our colleagues completed our Code of
Conduct training by the end of 2024

Our policies

We have a robust policy framework, underpinned by our Code of Conduct and our Values. The implementation of our policies is typically enabled by supporting procedures, guidance documents, toolkits and assurance activities.

Set out in the table following are the key policies that support our human rights and modern slavery risk management program.

Policy	Implementation Action
Code of Conduct Incorporates our commitment to respecting labour and broader human rights. This includes our commitment to the International Labour Organization’s fundamental labour rights, including a zero-tolerance approach to modern slavery, forced labour and child labour.	Our Code of Conduct is available in several languages on our website and intranet. Code of Conduct training is mandatory for all employees and contractors and is embedded in employee and key supplier agreements. To encourage a culture of compliance, 2024 was the first year that failure by an employee to complete the mandatory training would result in a 5% bonus reduction.
Human Rights Policy Reinforces our commitment to human rights and support for the UNGPs. It also sets out our commitment to the International Labour Organization’s fundamental labour rights, which includes a zero-tolerance approach to forced, bonded and child labour.	Our Human Rights Policy is available on our website and intranet in several languages and is embedded in the Social Way Toolkit. In 2024 we conducted an internal gap review of the implementation of our Human Rights Policy based on its integration across functions and business processes.
Responsible Sourcing Standard for Suppliers Designed as a ‘Code of Conduct’ for suppliers, the standard was updated to further emphasise action on modern slavery. The updated standard now includes 13 principles and 37 sub-principles to support suppliers to respect labour and human rights, including: not using child labour, opposing unfair or inhumane treatment of the workforce, eliminating irregular employment and acting against modern slavery or other human rights issues in the value chain.	Our updated Responsible Sourcing Standard for Suppliers is available on our website and is supplemented by a due diligence framework, including supplier self-assessments and third-party audits, which suppliers participate in/complete as required. Responsible sourcing requirements are embedded in all supplier contract templates and purchase order conditions. A failure by a supplier to comply with responsible sourcing requirement, including those prohibiting the use of child labour, forced labour and other forms of modern slavery, constitutes a breach of contract and gives us suspension and termination rights under the contract. Typically, we would seek to work with a supplier to address any concerns and implement a Corrective Action Plan before seeking to end the supplier relationship.
Responsible Commodity Sourcing Policy for Marketing Builds on our commitment to respect human rights expressed in our Responsible Sourcing Standard for Suppliers to provide additional guidance for our commodity suppliers and intermediaries. The policy requires commodity suppliers commit to respecting labour and broader human rights and implement appropriate mechanisms to evaluate and address supply chain-related risks. These include the use of child labour and all forms of forced or compulsory labour, including other forms of modern slavery, for the metals and minerals they supply to our marketing business.	Our Responsible Commodity Sourcing Policy for marketing is available on our website. The requirements it sets have been embedded into our Know Your Counterparty (KYC) process in the form of a comprehensive self-assessment questionnaire which existing sourcing counterparties are in the process of completing. We have developed training materials for internal teams, which we continued to roll out in 2024 through targeted training to our marketing business.
Social way policy and toolkit Anglo American’s Social Way Policy underscores our human rights commitment and is based on leading international reference standards, including the UNGPs. A human rights approach has been applied to the Social Way, which requires all sites to conduct a social and human rights risk analysis (SHIRA) annually throughout the life of an asset. One of the categories that is included in the SHIRA process is impacts on personal and political security, including the right to freedom from slavery and forced child labour.	Our Social Way Policy and Toolkit are available in English, Portuguese and Spanish on our website and intranet. Throughout 2024, we have been updating and optimising the policy framework, and we are planning to finalise an updated Social Way Policy and Standard in 2025. The policy and standard are supported by a practitioner toolkit, providing simple practical guidance on how to implement our commitments.

Identifying, assessing and addressing modern slavery and child labour risks



Our people

Our people are our greatest asset. We have more than 3,100 direct employees and 7,000 full-time and part-time contractors working across our operational sites and Brisbane Corporate Office.

Addressing risk to our workforce

We consider the risk of modern slavery and child labour among our direct employee workforce to be low. This reflects the strong labour laws in the Australian jurisdiction, effective employee on-boarding procedures for the verification of employee identity, and the requirement for employees to hold relevant licences to perform their duties.

In addition to direct employees, Contractors make up part of our workforce and may be at greater risk of human rights impact if similar controls are not in place. In relation to contractors, our Contractor Performance Management Framework provides the foundation for safe and stable production by helping to create a psychologically and physically safe, healthy and productive work environment. Human rights considerations are integrated into the framework, which can help us manage potential modern slavery risks in relation to our contractors including minimum labour rights standards that help ensure safe and fair working conditions and opportunities to strengthen contractors’ access to grievance mechanisms.

Our updated Responsible Sourcing Standard for Suppliers defines minimum expectations for suppliers and contractors to operate legally and fairly – with added emphasis on the protection of human rights, including combating modern slavery and eliminating child labour.

Additional employee support

The Workplace Support Unit provides dedicated and confidential trauma informed care to those who come forward to report bullying, sexual harassment and discrimination. The unit helps provide end-to-end support through advice, early intervention, mediation, support and recovery.

The Workplace Support Unit collaborates with individuals by listening and communicating without judgment, providing and facilitating support options to individuals so that they are in control of their decision making and empowered to make choices. The aim is to ensure individuals are not exposed to harm and their psychological health and safety is supported.

Individuals who experience or witness bullying, sexual harassment, discrimination or victimisation are encouraged to contact the Workplace Support Unit for confidential support, guidance and information.

The Workplace Support Unit recognises the need for inclusive, fair and transparent approaches. Individuals who are concerned about their behaviours or would like support to improve their behaviours can contact the Workplace Support Unit.



Responsible operations

The Social Way Policy and Toolkit requires operations to conduct social and human rights risk analyses (SHIRAs) as the basis for understanding and managing social and human rights risks and impacts.

This is an integrated process that captures a wide range of impacts, categorised into economic, socio-cultural considerations, infrastructure and services, cultural heritage, community health and safety, and personal and political security impacts. The personal and political security category covers slavery, forced labour and child labour.

In 2024, there were no slavery, forced or child labour impacts identified at our Australian operations through the SHIRA process.

Recognising our workforce and communities overlap, we are strengthening our approach by enhancing how information and learning is shared across teams addressing risks to workforce and communities. Anglo American is developing further guidance for sites to ensure human rights due diligence processes, which include community impact considerations at operations, are comprehensive.



Our supply chain

We procure a variety of goods and services to support the exploration, mining, transportation, aggregation, processing and technology required for our operations and corporate activities.

In 2024, Anglo American in Australia spent about US\$2,236M with suppliers, of which \$2,234M was with Teir 1 suppliers based in Australia.

We remain committed to principles of inclusive procurement to create a more equitable and inclusive supply chain. By focusing on meaningful relationships with host communities and especially Aboriginal and / or Torres Strait Islander owned businesses and small-to-medium enterprises, we are committed to fostering long-term, sustainable prosperity, potentially reducing some of the structural vulnerabilities that can lead to exploitation, including those related to modern slavery.

Informing Supply Chain Due Diligence

Some of the key risk factors that form part of our risk assessment include:

Product or sector: Industries that are known or reported to be associated with labour exploitation, or operate in high reliance on unskilled seasonal migrant labour. Referred to as the “three Ds”, modern slavery risk is increased where procured goods are produced through work considered dirty, dangerous, and dull or demeaning.

Data sources include: UN Global Compact Australia, Global Slavery Index, Stronger Together.

Entity: Entities with a lack of adequate policies and procedures to provide worker protection, have reported non-compliance (civil) or convictions (criminal) related to human rights violations, and no access to grievance pathways.

Data sources include: UN Business and Human Rights Resource Centre; Department of Foreign Affairs and Trade (DFAT) Consolidated List, Financial Action Taskforce List.

Geography: Countries or regions with weak rule of law, systemic corruption, inadequate industrial protections for workers, and / or reported prevalence of human rights violations.

Data sources include: UN Global Compact Australia, Corruption Perceptions Index, Global Slavery Index.

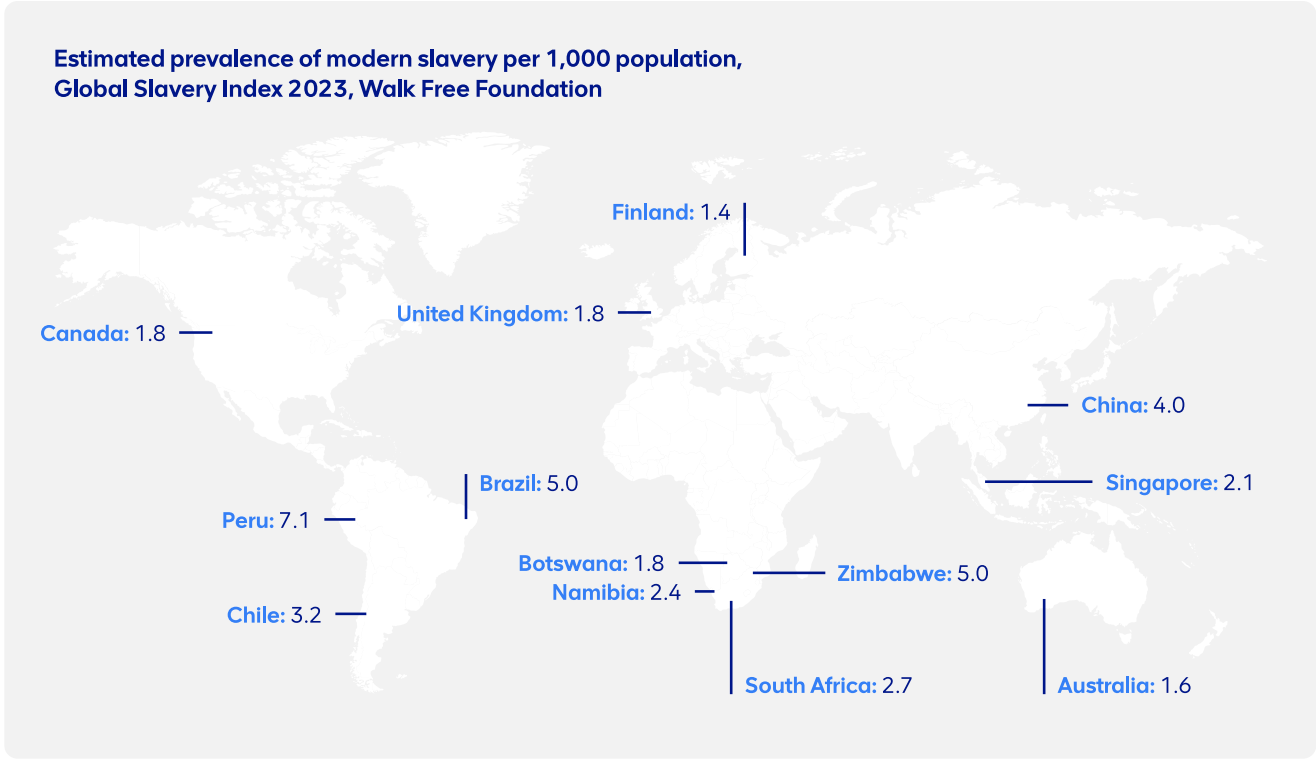
Procurement Models: Avoiding or eliminating procurement models that could result in high-risk labour practices, including those which reward systemic, excessive discounted pricing (including reverse-factoring), demand unrealistic supplier performance or otherwise drive suppliers to a ‘race to the bottom’ that could result in high-risk labour practices.

Key statistics (all in \$US)



Tier 1 Supplier Locations

Country	# Suppliers	% of Suppliers
Australia	1524	98%
USA	10	<1%
Canada	6	<1%
United Kingdom	5	<1%
South Africa	4	<1%
Malta	2	<1%
Cyprus	1	<1%
Germany	1	<1%
Hong Kong	1	<1%
Ireland	1	<1%
New Zealand	1	<1%
Singapore	1	<1%
Sweden	1	<1%



Modern slavery hot spot analysis

In 2022, our supply chain analysis identified the following key modern slavery risks:

- Low-skilled labour
- Temporary and migrant labour
- Strong pricing competition
- Subcontracting and complex supply chains
- Sourcing from high-risk geographies

Modern slavery hotspots in 2024

We consider the hot spots identified in 2022 remain relevant to our operations and supply chain in 2024 but continue to review how we could be potentially involved in new or evolving modern slavery risks. Our expanded list of modern slavery risk areas is outlined below and reflects the spend categories where additional due diligence is required beyond supplier pre-screening and onboarding processes.

Modern slavery risk hotspot

Temporary low-skilled labour for sites (especially seasonal labour)
Security services
Site-management services
Third-party storage facilities, including warehouses and ports
End-of-life waste management (including demolition and recycling)
Renewable energy sources, including solar panels and batteries
PPE and workwear (including uniforms, masks and gloves)
Tyres and other rubber products
Fuel, oil and lubricants
Processing of commodities from third parties in high-risk geographies
Information and communication technology (ICT) equipment and services
Shipping
Construction labour and materials

We recognise our evolving operations and value chain may give rise to other modern slavery risks in addition to those we have currently identified. We regularly monitor our modern slavery risk profile to account for such changes in our operating environment. For example, we acknowledge the modern slavery risks such as forced labour associated with the products and value chains that support the transition to a low-carbon economy.



Supply chain due diligence

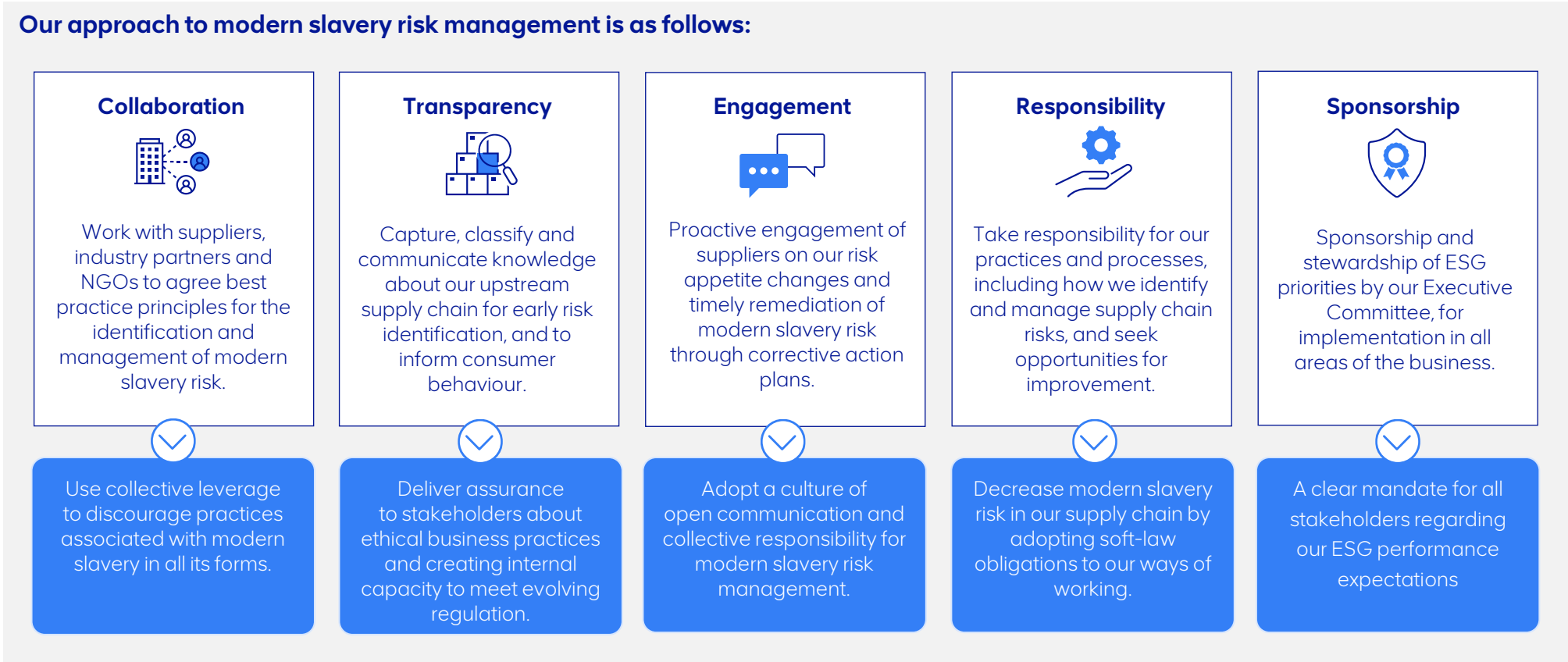
We continue to identify those suppliers with an increased potential for modern slavery risk and use that identification as a basis for informing the level of due diligence required, including whether suppliers must complete a self-assessment questionnaire.

In 2024, we made several updates to our self-assessment questionnaire platform to automate the provision of guidance on identified risk areas. This approach provides suppliers with an opportunity to understand modern slavery and human rights risks in their own operations, enabling them to manage the identified issues to limit unintended consequences. If a supplier rejects the recommendations, or is not able to demonstrate progress towards resolution, the matter is then escalated and may result in review of the supply relationship by the supply chain leadership team in Australia.

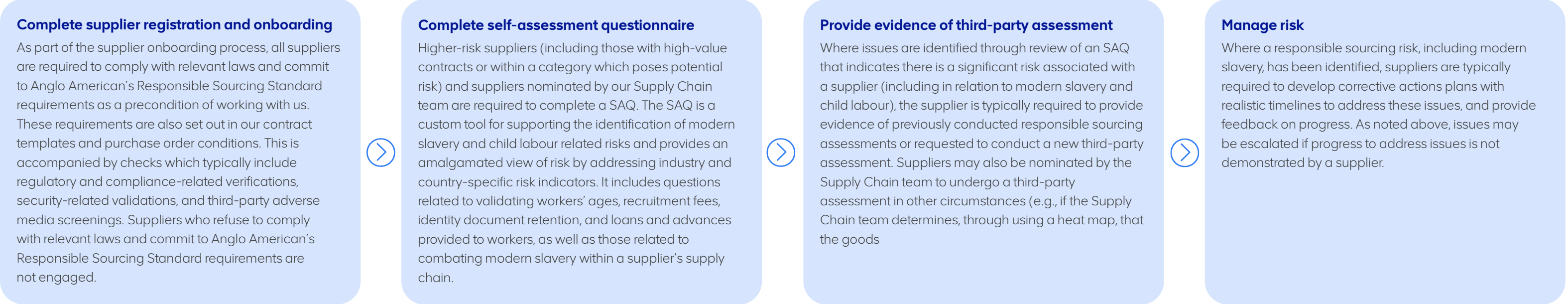
We have adopted a development approach whereby suppliers are given an opportunity to address breaches and serious non-conformances using a corrective action plan where progress is monitored and unresolved actions escalated if required. Evidence of completion of corrective-action plans is expected from suppliers, and, in some cases, we involve third-party assessors to confirm action plan close-out.

Our responsible sourcing strategy consists of four focus areas:

- Progressive standards and policies.
- Awareness training and capacity building.
- Risk-based due-diligence.
- Advocacy for wider industry alignment



Suppliers are expected to:



Our counterparties

Anglo American has formal relationships with various stakeholders across the value chain, including suppliers, customers, shareholders, financial institutions, industry associations and joint-venture partners.

We recognise that through each of these types of relationships, a mining company could potentially contribute to, or be directly linked to, modern slavery, and we are taking a range of steps to manage these risks.

Joint Venture Partnerships

A mining company could potentially contribute to, or be directly linked to, modern slavery through its joint ventures or non-managed joint ventures. Through proactive engagement of our joint venture partners on ethical business conduct and human rights matters (including those relating to modern slavery and child labour) we seek to influence the adoption of a framework commensurate with the requirements of our policies, procedures and standards, and to ensure compliance with local laws and associated requirements.

Anglo American in Australia holds interests in several joint ventures, and in the case of the steelmaking coal business is the majority shareholder in each operation (as outlined below). As the major joint venture partner, Anglo American is a steward of responsible business practices.

- | | |
|--------------------|-----|
| • Moranbah North | 88% |
| • Grosvenor | 88% |
| • Capcoal Open Cut | 70% |
| • Aquila | 70% |
| • Dawson | 51% |

Divestment

As part of the intended sale of the Anglo American steelmaking coal portfolio, Anglo American Plc has considered the ESG credentials (health and safety, human rights, social, and environmental) and management experience of prospective buyers. This due diligence has been undertaken alongside the assessment of potential buyers’ financial and technical capabilities as appropriate.

Marketing

We endeavour to support our commitment to reliable steelmaking coal supply with robust assurance around responsible production. We are building a consistent approach to sustainability risk and opportunity identification (including in relation to modern slavery and child labour) through screening, due diligence and post-deal management processes.

The marketing business operates under the Anglo American Responsible Commodity Sourcing Policy, which aids us in identifying and mitigating risks related to purchasing third-party mined commodities. This policy provides guidance for our commodity suppliers and intermediaries, informed by the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

As noted above, in 2023, our Anglo American Group marketing business commenced a high-level human rights due diligence project with the support of an expert third-party advisory firm to better understand human rights related risks associated with areas covered by the marketing business (specifically, related to shipping and trading). Though ongoing training was delivered in 2024, further implementation of actions identified from this project were paused following Anglo American’s portfolio simplification focus.

A key aspect of the marketing business due-diligence program is the Know Your Counterparty (KYC) procedure, which assesses factors including ESG and legal risks and ethical business conduct available.



KYC Process

Initial screening

Marketing counterparties are screened for adverse news through a third party. While the adverse news screening does not specifically focus on modern slavery, it does include specific search filters on various issues which may relate to modern slavery.



Due diligence and risk classification

Higher-risk counterparties, including those acting as intermediaries in a trading relationship, are also required to complete a questionnaire. As part of the questionnaire, they are required to state and provide evidence on whether they comply with relevant human rights and Modern Slavery legislation or equivalent laws which involve the prohibition of child labour; forced, bonded or involuntary prison labour; inhumane treatment of the workforce (including physical, sexual, or verbal abuse, bullying or any other forms of intimidation); and human trafficking. These counterparties will be required to confirm if they place requirements or expectations on their third parties (e.g., suppliers, sub-contractors and business partners) to identify and manage risks in relation to human rights (including modern slavery). Based on the questionnaire responses, counterparties are given a risk score of either low, medium, or high risk.



Enhanced due diligence

High-risk counterparties are assessed on a case-by-case basis, and enhanced due diligence is conducted. If any red flags or risk factors are confirmed, the counterparty is expected to provide an explanation of how these have been resolved/mitigated.



Risk mitigation

In the event that risks identified through the enhanced due diligence process are not adequately managed, counterparties are required to develop corrective action plans, with realistic timeframes for addressing the risks. This could include risks relating to modern slavery.

Our counterparties continued

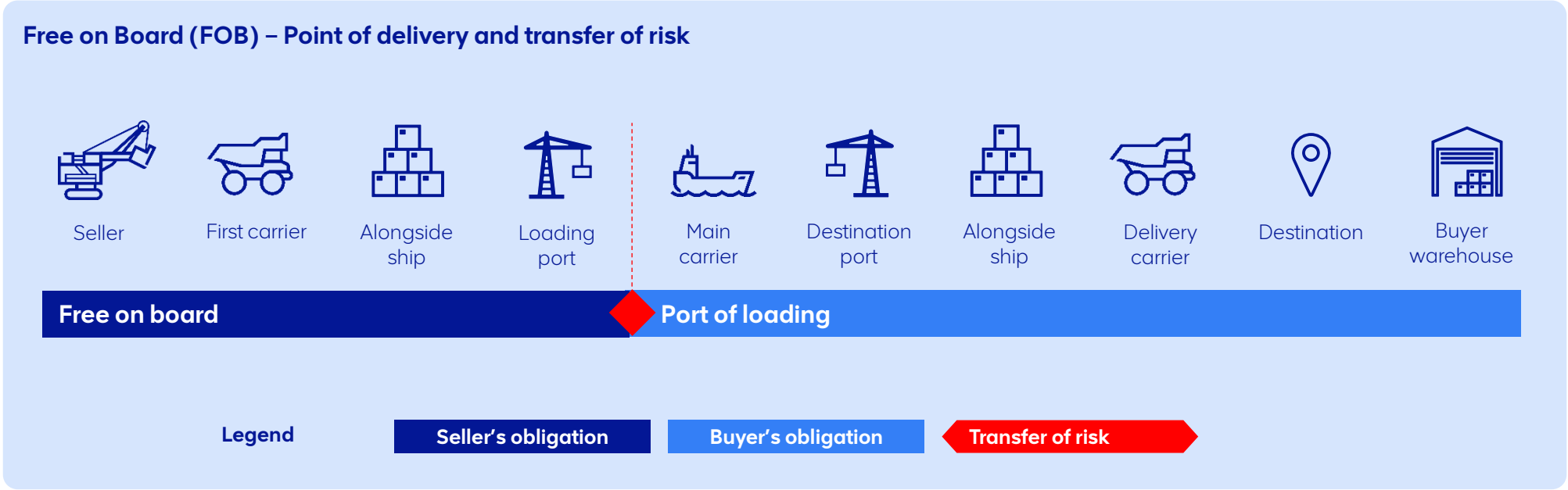
Shipping

The shipping industry has made significant progress in respecting human rights through regulatory improvements, industry initiatives, technological advancements and increased advocacy. However, working conditions, welfare and lack of legal protection remain an ongoing concern. Many maritime workers spend a great deal of their time in international waters, out of reach of authorities on land. This adds to the challenges posed by the fragmented nature of shipping activities due to varying regulations and enforcement standards across different jurisdictions.

As part of the Know Your Counterparty process, Anglo American’s marketing business has developed specific questions relating to seafarers’ rights. We request potential counterparties providing shipping services to respond to these questions by providing information and tangible evidence that help us understand how they prevent and mitigate any potential issues.

Anglo American’s steelmaking coal operations in Australia sell mined product as ‘Free on Board’, meaning the buyer assumes all subsequent costs and risks related to ocean freight, including cost, insurance, unloading at the destination, and any import duties. We recognise the fundamental requirement for responsible business conduct in shipping industry, and encourage compliance by:

- incorporating modern slavery clauses in marketing and sales contracts, and
- requiring counterparties to warrant that they conduct business in a manner that respects the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, and applicable anti-slavery and human trafficking laws, statutes and regulations, including the Modern Slavery Act and global equivalents in connection with the sourcing, handling, transportation and storage of products Anglo American supplies.



Access to remediation

In line with our Human Rights Policy, where we identify that we have caused or contributed to adverse human rights impacts (including modern slavery or child labour), we will co-operate in or provide for their remediation as appropriate, in line with the expectations in the UNGPs.

YourVoice

We ensure accessible and safe grievance mechanisms are available to all people impacted by our operations, including employees, contractors, suppliers and other business and community stakeholders. [YourVoice](#) is our confidential reporting service, available 24 hours as a safe avenue to raise concerns about potentially unethical, unlawful or unsafe conduct. YourVoice is an independent third-party reporting service and will investigate any report made in good faith regarding practices that conflict with our [Values or Code of Conduct](#). We have a zero-tolerance policy for any form of retaliation against whistleblowers, as outlined in our [Whistleblower Policy](#).

In 2024, we received no modern slavery related allegations or reports via YourVoice, and no issues reached the threshold for escalation from our site-level grievance mechanisms. We recognise a lack of allegations or reports of modern slavery does not of itself mean modern slavery is not present in our operations and supply chains.

Grievance Procedure

In addition to YourVoice, each Anglo American operating site in Australia has a publicly advertised Grievance Procedure that aligns with the International Finance Corporation Performance Standard 1 “Assessment and Management of Environmental and Social Risks and Impacts” and the UNGPs.

External stakeholders, including contractors, can report grievances and incidents that have a social consequence through a site-level mechanism. One of the categories of incidents that can be reported is personal and political security, which includes incidents related to the right to freedom from slavery, forced and child labour, and debt bondage. Grievances and incidents of a higher social consequence level would be escalated to Group level.

In 2024, no slavery, forced or child labour impacts were identified through the operating site grievance process.



Assessing the effectiveness of our approach

We recognise that assessing the effectiveness of our overall approach and specific actions is a critical component of our response to modern slavery and is key to continuous improvement.

Key performance indicators that underpin the assessment of our effectiveness include:

- Year-on-year increase in the number of supplier self-assessment questionnaires completed.
- Increase in the number of suppliers with Contractor Social Performance Management Plans.
- The proportion of employees that have completed Code of Conduct training.
- The number of YourVoice cases received, and the nature of those cases.
- Internal audit outcomes.
- Outcomes of Social Way and TSM self-assessment.
- External verification of performance against standards, including TSM.



Looking forward

Despite not identifying any incidents in 2024, we recognise that the nature of our industry, the countries where we operate and source from, and the categories of goods and services we procure, mean there is still potential for modern slavery risks.

In 2025, Anglo American in Australia commits to the following actions:

- Continue the roll out of TSM to our Dawson Mine operations until the separation of steelmaking coal entities from Anglo American Plc.
- Deliver ongoing awareness and training to support our personnel to understand, identify, assess and manage modern slavery risks.
- Defining roles and responsibilities for modern slavery risk management through the organisational transition.



Appendix I – Reporting entities

Reporting Entity	Description
Anglo American Australia Limited (ACN 004 892 371)	Ultimate Australian holding company for the Australian steelmaking coal and corporate companies.
Anglo American Steelmaking Coal Holdings Limited (ACN 079 017 940)	Main sub-holding company for Anglo American’s steelmaking coal operations in Australia.
Anglo American Steelmaking Coal Finance Limited (ACN 081 152 276)	Finance company for the coal operations in Australia. Borrows funds from Anglo American Australia Finance Limited and on-lends to the joint venture participant companies and other companies in the coal group.
Anglo Coal (Dawson) Holdings Pty Ltd (ACN 100 197 699)	Holding company for Anglo American’s interests in the Dawson coal mine.
Anglo American Steelmaking Coal Assets Pty Ltd (ACN 081 022 246)	Subsidiary of Anglo American Steelmaking Coal Holdings Limited and the main subholding company for Anglo American’s coal joint venture participant and operating companies
Anglo American Steelmaking Coal Assets Eastern Australia Limited (ACN 009 727 851)	Subsidiary of Anglo American Steelmaking Coal Assets Pty Ltd and a sub-holding company for various companies.
Anglo American Australia Finance Limited (ACN 104 162 638)	Main finance company for the Australian group. The company is the borrower of funds from Anglo American’s UK finance companies which it on-lends to the Australian group of companies.
Anglo Coal (Dawson) Limited (ACN 100 155 342)	Joint venture participant company that holds a 51% interest in the Dawson joint venture. The company is also a sub-holding company for various Dawson companies.
Anglo Coal (German Creek) Pty Ltd (ACN 081 022 415)	Joint venture participant company that holds a 56.97% interest in the Capcoal joint venture, which includes the Aquila underground mine, and the Lake Lindsay open pit mine. It also holds a 52.7% interest in the Roper Creek joint venture.
Moranbah North Coal Pty Ltd (ACN 007 083 249)	Joint venture participant company that holds an 88% interest in the Moranbah North Coal Joint Venture which owns the Moranbah North underground longwall mine and the Grosvenor underground longwall mine, both of which are located near the township of Moranbah in Central Queensland.
Anglo Coal (Jellinbah) Holdings Pty Ltd (ACN 099344993)	Previously held Anglo’s 33.33% interest in Jellinbah Group Pty Ltd, which was sold on 29 January 2025. The company is now dormant.

Appendix II – How our statement addresses MSA reporting criteria

Reporting Criteria	Reference in this statement
Identify the reporting entity.	About this statement (page 02) Appendix I (page 24)
Describe the reporting entity’s structure, operations, and supply chains.	About this statement (page 02) Our operations (page 07) Our business model (page 08) Tier one supplier locations (page 16) Identifying, assessing and addressing modern slavery and child labour risks (page 13-19)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Embedding our commitments (page 9-12) Identifying, assessing and addressing modern slavery and child labour risks (page 13-19)
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Summary (page 06) Embedding our commitments (page 9-12_ Identifying, assessing and addressing modern slavery and child labour risks (page 13-19)
Describe how the reporting entity assesses the effectiveness of such actions.	Assessing the effectiveness of our approach (page 22)
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	About this statement (page 02)
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	About this statement (page 02) Message from the Chief Executive (page 03) Looking forward (page 23)

Contacts and other information

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This document includes forward-looking statements. All statements other than statements of historical facts included in this document, including, without limitation, those regarding Anglo American’s financial position, business, acquisition and divestment strategy, dividend policy, plans and objectives of management for future operations, prospects and projects (including development plans and objectives relating to Anglo American’s products, production forecasts and Ore Reserve and Mineral Resource positions) and sustainability performance related (including environmental, social and governance) goals, ambitions, targets, visions, milestones and aspirations, are forward-looking statements. By their nature, such forward-looking statements involve known and unknown risks, uncertainties and other factors which may cause the actual results, performance or achievements of Anglo American or industry results to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements.

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Comments or queries related to this report

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[Tax and Economic Contribution Report](#)

[Voluntary Principles on Security and Human Rights](#)

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