



Modern Slavery  
Statement 2023

# About this statement

This statement provides our stakeholders with a transparent account of the approach and actions we took to assess and address modern slavery risks in our operations, business activities and value chain during 2023.

This Statement is made in accordance with Australia's Modern Slavery Act 2018 (Commonwealth) (Australian MSA) and the United Kingdom's Modern Slavery Act 2015 (UK MSA). It covers the period 1 January 2023 to 31 December 2023. It is a joint statement made on behalf of the UK MSA and Australian MSA reporting entities listed in Appendix I.

A separate Modern Slavery Statement is being made by De Beers and its relevant owned and controlled entities pursuant to section 54 of the UK MSA 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 (Canadian FLCLA).<sup>1</sup>

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 Australian MSA and UK MSA reporting criteria can be found in Appendix II.

For information regarding the Anglo American group (the Group) terminology, forward-looking statements and third-party information, please refer to the inside back cover of this document.

All reporting entities listed in Appendix I were consulted in developing this statement. In preparing this statement, we also consulted with and obtained input from relevant functions and businesses across the Group, including Supply Chain, Marketing, and Business Assurance Services, and confirm that, for the purposes of sections 14(2) and 16(1)(f) of the Australian MSA, this included those whose responsibilities cover the reporting entities and their owned and controlled entities. We also consulted with the reporting entities and owned and controlled entities covered by this statement by engaging with the company secretary for these entities. In addition, on 30 May, 2024 the directors of the Australian reporting entities met to review, discuss and endorse this Statement.

The consultation process outlined above helped to ensure that the Statement reflects our Group's approach to identifying, preventing, mitigating and accounting for modern slavery risks.

This Statement was approved by the Board of Anglo American plc (the Board) on 5 June, 2024 and each of the boards of Anglo American Services (UK) Ltd and Anglo American Technical & Sustainability Services Ltd, Anglo Platinum Marketing Limited, Anglo American Marketing Limited and Kumba International Trading Limited on 7 June, 2024 under section 54(6)(a) of the UK MSA. The Anglo American plc Board also approved it on behalf of the Australian reporting entities listed in Appendix I on 5 June, 2024 under section 14(d)(ii) of the Australian MSA.

This Statement has been signed below by Duncan Wanblad, Chief Executive of Anglo American plc.



**Duncan Wanblad**  
Chief Executive

1. No other Anglo American entities are required to report under the FLCLA.

## Contents

- 02 About this statement
- 03 Message from the Chief Executive
- 04 Summary
- 08 Embedding our commitment across the business
- 13 Identifying, assessing and addressing modern slavery and child labour risks
- 24 Engagement and collaboration
- 25 Assessing the effectiveness of our approach
- 26 Looking forward
- 27 Appendices



## Our reporting suite

You can find this report and others, including the Integrated Annual Report, the Climate Change Report, our Tax and Economic Contribution Report and the Ore Reserves and Mineral Resources Report, on our corporate website.




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[angloamerican.com/reporting](https://angloamerican.com/reporting)

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# Message from the Chief Executive

Respect for human rights is central to Anglo American's values and a critical foundation of our entire approach to sustainability. We are ever mindful of how our activities can affect the rights of people – through impacts on the health and safety of our workforce, working conditions for our suppliers' workers, or the well-being of communities – and how those impacts can change and evolve over time.

## Addressing our human rights risks

We are proud of the role we play in respecting and supporting human rights – through promoting safe and decent work, our commitment to responsibility, compliance, and transparency in taxation, or through improving health, livelihoods and education in host communities through our Sustainable Mining Plan.

It is also true that some of our activities have the potential to adversely affect human rights. We are committed to the safety and health of our workforce while striving to minimise harmful effects on the environment and communities, including being mindful of the potential human rights impacts related to security services. We also recognise that human rights impacts can occur in our supply chain, and we continue to build our understanding and management of relevant human rights risks such as modern slavery and child labour across our supply chain, which includes a network of more than 13,000 suppliers around the world.

## The changing landscape of business and human rights

The human rights and business landscape is dynamic and encompasses an evolving regulatory landscape with increasingly stringent requirements for businesses around how they should respect human rights and undertake due diligence. This trend, together with ongoing discussion around responsible investment, continues to heighten stakeholder expectations of business. Given new legislation and reviews of existing legislation, such as the recent review of the Australian Modern Slavery Act, we are mindful of the need for continuous improvement both in terms of managing risks to rights holders, and disclosure of actions taken to ensure stakeholders can access the information they need.

## Tackling modern slavery

A number of challenging global developments have increased the economic and social vulnerability of many people around the world. As the number of people experiencing modern slavery is thought to be increasing on a global basis, the International Labour Organization estimated recently that the annual illegal profits from this exploitation amount to US\$236 billion. As vulnerability invariably underpins the incidence of modern slavery, we are ever more conscious of the importance of understanding and addressing modern slavery risks in our business and in relation to our business relationships.

Consequently, in 2022, we took steps to strengthen our approach to identifying and addressing modern slavery, in our operations and value chain (including supply chain). These included undertaking a modern slavery hotspot analysis to identify key risk areas across our business and value chain. We built on this in 2023 and undertook an analysis of risk management processes to identify priority actions to strengthen due diligence in the areas of greatest risk. We have also engaged with strategic supplier partners related to procurement of heavy equipment to enhance supplier due diligence around modern slavery risks. To keep building internal understanding and capacity to manage risks, we provided more issue-specific guidance to better explain how human rights intersect with various areas of our business.

Addressing modern slavery is complex and of course we have more to understand. We are learning from others and are committed to monitoring and evaluating our own actions to help ensure how we identify risks, prevent impact and remediate as necessary, improves over time. Our priorities for improvement include gaining a deeper understanding of our most salient modern slavery risks, bolstering our use of new technology solutions to increase the visibility of our supply chain, and providing more targeted training to ensure that our people have the capability to help us identify and address modern slavery.

I am pleased to sign and present this statement, and thank the Board, our people and all those with whom we work for their support and partnership in 2023.

**Duncan Wanblad**  
Chief Executive



# Summary

At Anglo American, we are guided by our Purpose – re-imagining mining to improve people’s lives – to deliver sustainable value for all our stakeholders. We are transforming the very nature of mining for a safer, smarter, more sustainable future.

Expectations that companies prevent and address modern slavery (including forced labour) remain high and are increasingly being enshrined in domestic laws and other core standards. Canada is the latest country to approve legislation with the establishment of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canadian FLCLA). Demand for responsibly sourced products has also led to sustained scrutiny on how companies, including in the mining sector, assess and address risks across their operations and value chains.

This statement outlines the approach and actions Anglo American took to assess and address modern slavery risks in our operations and value chain (including supply chain) in 2023. It outlines the policies we have in place, the practical steps we have taken, key achievements, and priorities for the year ahead.

This is our seventh Modern Slavery Statement published in compliance with the UK MSA, and our fourth Modern Slavery Statement in compliance with the Australian MSA. (In 2020, our Steelmaking Coal business published a separate statement in compliance with the Australian MSA.)

Our endeavours to address modern slavery and work towards ensuring that our value chain is free from exploitation form part of our broader work to identify and address human rights risks. We recognise our responsibility to respect all internationally recognised human rights and have embedded our commitment to do so in our Group Human Rights Policy. Further information about our approach to human rights, including our recent achievements and priorities, is available in our Sustainability Report 2023.

## Progress against our 2022 focus areas

We have made positive progress on achieving commitments for 2023 that we published in our 2022 Modern Slavery Statement.

2023 Focus Areas (as reported in 2022)	Status
Commence a deep-dive analysis of key modern slavery risks and our risk management approaches	Achieved
Develop and roll out targeted human rights training modules for key functions involved in our efforts to assess and address modern slavery risks	Achieved
Identify opportunities to strengthen our incident reporting processes, including as regards to any modern slavery incidents identified	Ongoing
Continue to engage with our stakeholders on human rights issues, such as modern slavery	Ongoing
Continue to map our supply chains beyond our directly managed suppliers, including to inform our understanding of potential modern slavery risks in our extended supply chain	Ongoing
Develop human rights due diligence guidance for our sites supplementing the analysis they complete in Social and Human Rights Impact and Risk Analyses (SHIRA) and operational risk management processes	Ongoing*
Commence the development of a human rights monitoring and accountability framework	Work to commence in 2024*
Roll out our Responsible Commodity Sourcing Policy requirements	Ongoing
Continue to integrate human rights into operational and functional five-year sustainability plans	Ongoing

\* Due to internal organisational change and the resultant need to respond to an internal assurance efficiency review, some activities planned for 2023 will commence in 2024.

## Highlights in 2023

We worked with an expert third-party advisory firm to conduct a gap analysis of our modern slavery risk management. The gap analysis built on a modern slavery hotspot analysis we undertook in 2022, including by focusing on assessing our modern slavery risk management practices in selected risk areas identified through the hotspot analysis.

► [For more on the modern slavery hotspot analysis, See page 14](#)

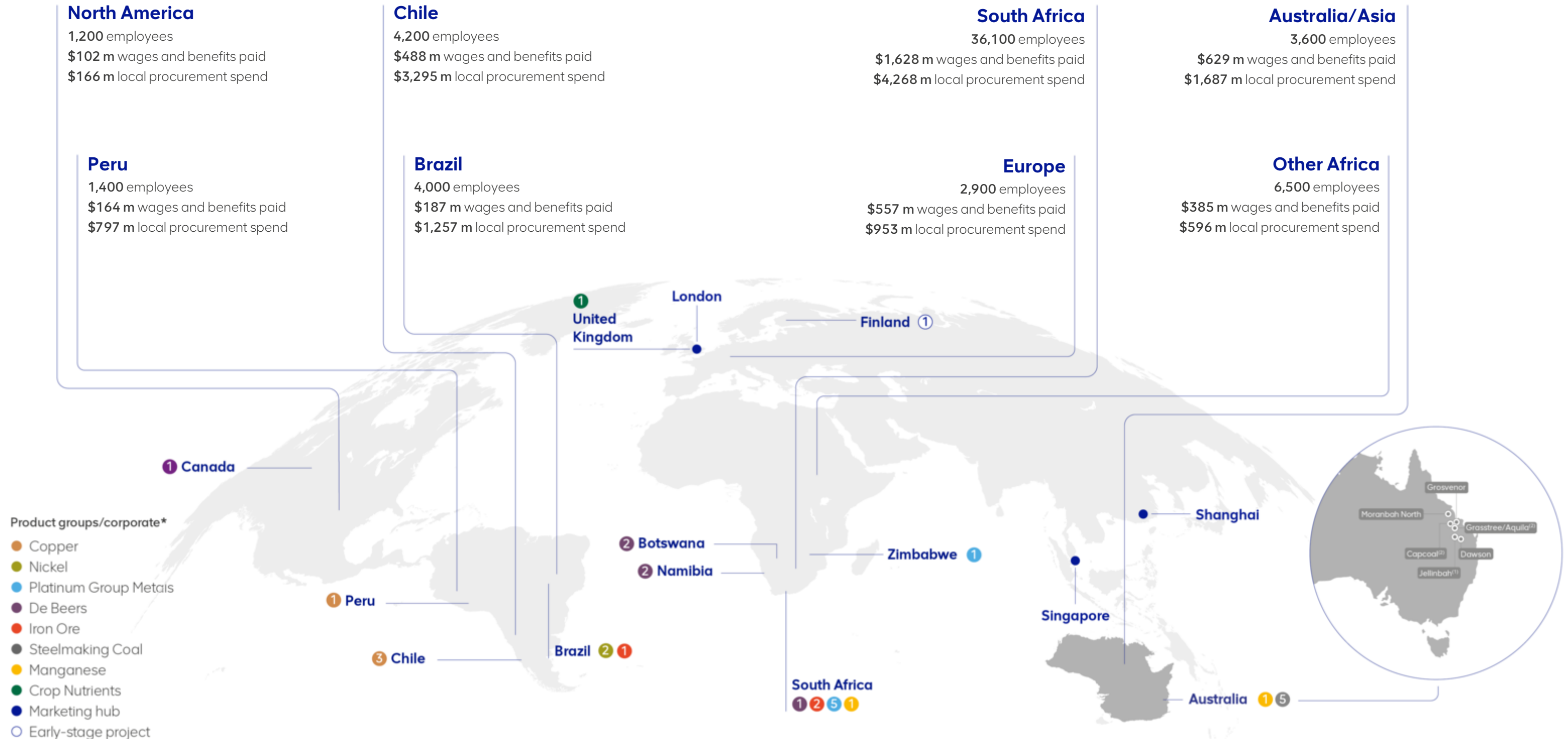
We continued to integrate consideration of modern slavery and child labour risks into our policies, systems and processes and internal and external engagement. Our collaboration with suppliers has continued, and during the year we engaged with strategic suppliers on due diligence related to modern slavery related risks.

► [For more on responsible sourcing, See page 17](#)

During 2023, we initiated a partnership with the Slave Free Alliance – a global NGO that works with companies to help protect supply chains and people from modern slavery and labour exploitation through responsible-sourcing approaches, including engagement with suppliers.

# Our business at a glance

Anglo American is a leading global mining company with a world class portfolio of mining and processing operations and undeveloped resources, providing tailored materials solutions for our customers, with around 60,000 employees working for us around the world.



\* Number within dot denotes number of operations, shown by product.

Estimated prevalence per 1,000 population. Global Slavery Index, 2018. Walk Free Foundation

# 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.

## Our inputs

### Ore Reserves and Mineral Resources

Our high quality, long life mineral assets provide a range of organic options for long term value delivery.

### Other natural resources

We aim to effectively manage the water and energy requirements of our mining and processing activities.

### Know-how

We use our industry-leading technical, sustainability and market knowledge to realise optimal value from our assets.

### Plant and equipment

We form strong relationships with suppliers, many of whom are located in the countries where we operate, to deliver tailored equipment and operating solutions.

### Financial

A strong focus on productivity, cost discipline and working capital management helps deliver sustainable positive cash flows, with balanced capital allocation to optimise returns.

## Our value chain



► For more information on our value chain  
See page 09 of the Integrated Annual Report 2023

## Outputs

We deliver many of the metals and minerals that enable a cleaner, greener, more sustainable world and that meet the fast growing consumer demands of developed and maturing economies. We strive to minimise our environmental footprint through our use of technologies and bring enduring social benefits through our approach, encompassed in our ambitious Sustainable Mining Plan.

Attributable free cash flow

**\$(1.4) bn**

Group attributable ROCE

**16%**

CO<sub>2</sub> equivalent emissions (Scopes 1 and 2)

**12.5 Mt**

Mined product shipped by our fleet

**>75 Mt**

### Production in 2023

- Copper: 826 kt
- Nickel (from Nickel and PGMs): 61.8 kt
- Platinum: 1,749 koz refined
- Palladium: 1,269 koz refined
- Rhodium: 226 koz refined
- Diamonds: 31.9 Mct
- Iron ore: 59.9 Mt
- Steelmaking coal: 16.0 Mt
- Manganese ore: 3.7Mt

### Governance

Our governance controls ensure we respond effectively to those matters that have the potential to cause financial, operational or reputational harm, while acting ethically and with integrity.

► For more information  
See pages 139–177 of the Integrated Annual Report 2023

### Materiality and risk

Identifying and understanding our material matters and risks is critical in the development and delivery of our strategy.

► For more information  
See pages 20–23 of the Integrated Annual Report 2023

### How we measure the value we create



► For our pillars of value See pages 86–89 of the Integrated Annual Report 2023

### Stakeholder engagement

Open and honest engagement with our stakeholders is critical in gaining and maintaining our social and regulatory licences to operate. Working within our social performance framework, it is our goal to build and sustain constructive relationships with host communities and countries that are based on mutual respect, transparency and trust.

► For more information See pages 16–19 of the Integrated Annual Report 2023

# Our global value chain



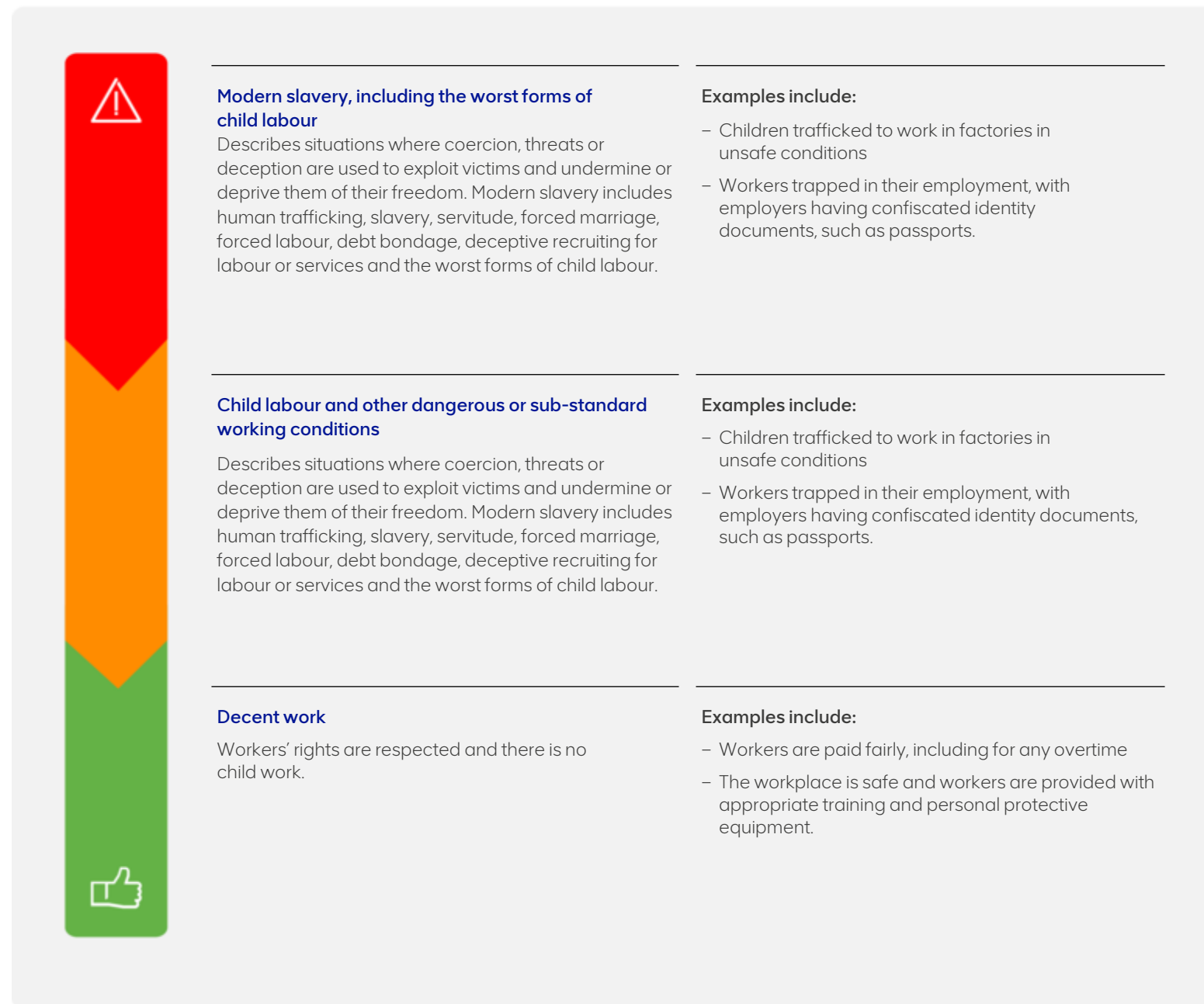
Embedding our  
commitment  
across the business





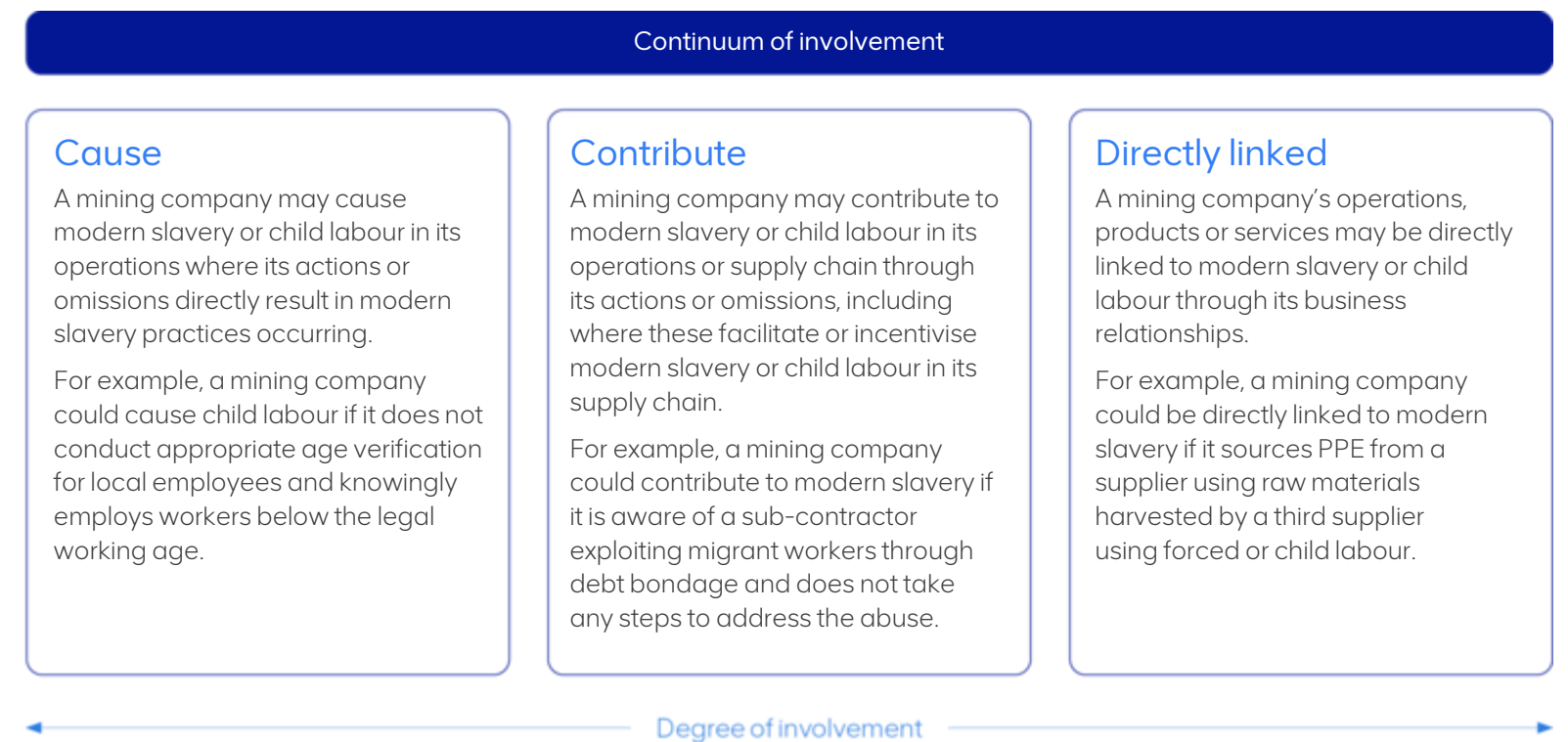
# Embedding our commitment across our business

As a prominent diversified global mining company, we operate in complex environments and in a range of geographies and jurisdictions. 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.



## How can we be involved in modern slavery or child labour?

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.



# Governance

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

Our Sustainability Committee, on behalf of the Anglo American plc Board (the Board):

- Oversees Group-level policies, processes and strategies designed to manage safety, health and well-being, environment, social and human rights, socio-political, and supply chain risks
- Aims to achieve compliance with sustainable development responsibilities and commitments
- Strives to ensure Anglo American continues to be a global leader in sustainable mining, including by maintaining our focus on respect for human rights.

The Sustainability Committee has visibility of risks and opportunities related to human rights across the group, including modern slavery and child labour. A human rights update is presented to the Executive Leadership Team (the team that provides advice and support to the Anglo American plc chief executive) and the Board's Sustainability Committee at least annually, with additional topics presented as the need arises. In 2023, the Sustainability Committee discussed human rights trends and an overview of the most salient human rights issues across Anglo American, which we have identified as occupational health and safety of employees and contractors, environmental management, labour rights, supply chain, community impacts, and security and human rights.

Approval of our policies relating to human rights, including modern slavery and child labour, sits with the Board. Overall accountability for human rights lies with the Strategy & Sustainability 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.



# Policies and resources

Anglo American has a robust policy framework, which is underpinned by our Code of Conduct and Values. The implementation of our policies is typically enabled by supporting procedures, guidance documents, toolkits and assurance activities. The policies and resources set out in the table on this page support our human rights (including modern slavery and child labour) risk management.

In 2023, we continued to implement our Responsible Sourcing Standard and enhanced our existing approach to commodity sourcing by developing a Responsible Commodity Sourcing Policy for our Marketing business. The Policy provides additional guidance for our commodity suppliers and intermediaries and conforms with the requirements of the OECD Due Diligence Guidance (DDG) for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The DDG includes provisions around forced or compulsory labour and child labour. The updated Policy further clarifies and places stronger emphasis on our requirements related to ethical business conduct, environmental management, human rights, and social performance management.

We remain committed to inclusive procurement and we have codified this commitment in our Inclusive Procurement Standard, which works to adequately equip and advance meaningful inclusion of host communities and other marginalised groups into our supply chain to generate shared, sustainable prosperity in those communities.

Policies and resources	Implementation action
<p><b>Code of Conduct</b> Incorporates our commitment to respecting labour and broader human rights. This includes our commitment to the International Labour Organization’s (ILO) core labour rights, including a zero-tolerance approach to modern slavery, forced labour and child labour.</p>	<p>Our Code of Conduct is available in several languages on our website and intranet. Code of Conduct training is mandatory for all connected employees and contractors and is embedded in employee and key supplier agreements.</p>
<p><b>Human Rights Policy</b> Reinforces our commitment to human rights and support for the UNGPs. It also sets out our commitment to the ILO’s fundamental labour rights, which includes a zero-tolerance approach to forced, bonded and child labour.</p>	<p>Our Human Rights Policy is available on our website and intranet in several languages and is embedded in the Social Way management. In 2023, we continued to provide human rights training, for both employees and contractors, as part of the Group’s mandatory compliance training. Around 98% of our total 12,500 connected employees completed the basic human rights training in 2023. We also provided more tailored training for specific functions to address risks related to their parts of the business.</p>
<p><b>Responsible Sourcing Standard for Suppliers</b> Sets out our requirements and expectations of suppliers of goods and services across five pillars, including respecting labour and broader human rights. There are specific requirements that suppliers not use child labour and combat all forms of modern slavery, including the elimination of trafficked, forced, bonded, and involuntary prison labour.</p>	<p>Our Responsible Sourcing Standard is available on our website in several languages (accompanied by explanatory videos in these languages) and its requirements are embedded in our supplier contract templates and purchase order conditions. A failure by a supplier to comply with our Responsible Sourcing Standard, including requirements prohibiting the use of child labour, forced labour and other forms of modern slavery, constitutes a breach of the standard contract and gives us suspension and termination rights under the contract. Typically, we would seek to work with a supplier to address any concerns before seeking to end the supplier relationship.</p>
<p><b>Responsible Commodity Sourcing Policy for Marketing</b> Builds on our commitment to respect human rights expressed in our Responsible Sourcing Standard to provide additional guidance for our commodity suppliers and intermediaries. The policy requires that commodity suppliers commit to respecting labour and broader human rights, and implement appropriate mechanisms to evaluate and address supply chain-related risks, including the use of child labour (including, in particular, the worst forms 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.</p>	<p>Our Responsible Commodity Sourcing Policy 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 rolled out in 2023.</p>
<p><b>Social Way Policy and Toolkit</b> 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) on an annual basis 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.</p>	<p>Our Social Way Policy and Toolkit are available on our website and intranet. A total of 483 people were trained through the Social Way learning programme in 2023, equalling 4,962 total hours of training.</p>

# Training and capacity building

Anglo American strives to enable a continuous learning culture and ensure that our people are supported to build the knowledge and capability needed to help us meet our commitment to respecting human rights, including by addressing modern slavery and child labour risks.

Our Code of Conduct training (which covers human rights and labour rights, including modern slavery) is available on our online training platform and is mandatory for all connected employees and contractors.

In 2023, we developed and launched a new online training module for employees at the manager level. The module on Doing Business with Integrity combined several business integrity related topics, providing practical examples and showing the connections between compliance areas. By the end of 2023, 12,355 of our colleagues had completed the training.

We continued to provide human rights training, for both employees and contractors, as part of the Group's mandatory compliance training. Around 98% of our total 12,500 connected employees completed the basic human rights training in 2023. We also completed the roll-out of more tailored modules for specific functions to address risks related to their parts of the business, including within Marketing, People & Organisation, Supply Chain, and our operating businesses.

We have developed a series of training materials which includes reference to modern slavery and child labour as part of the Labour and Human Rights element. Materials are available to our supply chain community and other internal stakeholders and include: implementation of inclusive procurement; responsible sourcing; due diligence; engaging with suppliers on risk management and corrective actions; and assessor red flag training.

Within Supply Chain, a dedicated Sustainability team supports the implementation of responsible sourcing across our sites, businesses and category management teams. This includes internal awareness and capacity building, management of supplier self-assessment platforms, relationships with external partners and audit companies, and supporting supplier capability development programmes. Short guides on various human rights topics, including modern slavery, are prepared and circulated and an annual 'human rights trends' report is presented across the business and featured on the company intranet along with other resources.



# Identifying, assessing and addressing modern slavery and child labour risks



# Modern slavery hotspot analysis

Our human rights due diligence processes typically cut across the full spectrum of human rights. In 2022, we conducted a hotspot analysis in an effort to better understand where the nature of our business activities and relationships may involve potential areas of modern slavery risk (including the worst forms of child labour). This process included consideration of a range of indicative modern slavery risk factors.

Whilst not addressing every avenue of risk, the modern slavery hotspot analysis pointed to 15 indicative modern slavery hotspots that identify potential areas of most severe modern slavery risk across our value chain. These hotspots are outlined below and they remained current for 2023. They are indicative only and do not cover all potential areas where modern slavery risks could exist.

The hotspot analysis focused on modern slavery risks (including the worst forms of child labour).

In line with the UNGPs continuum of involvement (outlined on page 9), we assess we are mostly likely to be directly linked to modern slavery in each of these hotspots. We recognise that if our policies, processes, and other controls outlined in this statement were not effective, this could potentially increase our risk of causing or contributing to modern slavery and child labour.

## Key modern slavery risk factors

- Low-skilled labour
- Temporary labour
- Strong pricing competition
- Migrant labour
- Sub-contracting, and complex supply chains
- Sourcing from high-risk geographies



Summary of modern slavery hotspot analysis

Modern slavery risk hotspot	Hypothetical examples of risk	Risk factors					Area of value chain							
		Low-skilled labour	Temporary Labour	Strong pricing competition	Migrant labour	Sub-contracting and complex supply chains	Sourcing from high-risk geographies	Discovery	Plan and build	Mine	Process	Move and market	Customers	End-of-life plan
Temporary low-skilled labour for sites	Contracted mining services workers could be exploited through modern slavery practices on the part of the contractor.													
Logistics and transport services in high-risk geographies	Drivers transporting commodities from site to a storage facility could be exploited through modern slavery.													
Security services	Security personnel engaged at a site could be exploited through modern slavery practices on the part of the security provider.													
Site-management services	Sub-contracted workers providing cleaning services at sites could be exploited through modern slavery practices on the part of the service provider.													
Third-party storage facilities, including warehouses and ports	Workers at a port facility owned and managed by a third party could be exploited through modern slavery.													
End-of-life waste management (including demolition and recycling)	Workers involved in end-of-life demolition activities at a site could be exploited through modern slavery.													
Renewable energy sources, including solar panels and batteries	Materials used in solar panels, batteries and other technologies could be produced using workers exploited through modern slavery.													
Personal protective equipment (PPE) and workwear	Workers manufacturing workwear in suppliers' factories could be exploited through modern slavery.													
Tyres and other rubber products	Young migrant workers on rubber plantations producing rubber used in mining truck tyres could be exploited through the worst forms of child labour.													
Fuel, oil and lubricants	Seafarers on vessels transporting fuel from refineries could be exploited through modern slavery.													
Commodities purchased through spot trades	Raw materials purchased through a spot trade were extracted by a third party, which could use the worst forms of child labour.													
Processing of commodities from third parties in high-risk geographies	A mining company provides working capital to a smelter which could use workers exploited through modern slavery to process feedstock.													
Information and communications technology (ICT) equipment and services	Workers providing outsourced ICT support services at a call centre could be exploited through modern slavery by the centre operator.													
Shipping	Seafarers on a vessel chartered to transport commodities could be exploited through modern slavery by the ship owner.													
Construction labour and materials	Workers contracted for construction services on a site could be exploited using modern slavery by the contractor.													

# Responsible operations

Anglo American has more than 90,000 employees and contractors working for us around the world. We recognise our potential to cause or contribute to modern slavery in and around operations through our acts or omissions, and are taking a range of steps to manage these risks.

## Addressing risks to our workforce

We consider the risk of modern slavery and child labour among our direct employees to be low. This reflects the presence of internal controls, including age verifications at the commencement of employment (through, for example, validating identification documents) and other measures designed to safeguard the rights of employees, as well as our commitment to comply with relevant workplace laws and standards in our countries of operation.

In relation to indirect employees, or contractors, the modern slavery hotspot analysis undertaken in 2022 pointed to potential risks around low-skilled, temporary and migrant labourers. The waste management, construction, security, site management and ICT services industries were identified as higher-risk industries in this regard and we recognise some of these industries may also present broader child labour risks.

Human rights considerations were integrated throughout the development of our Contractor Performance Management Framework, which can help us manage any potential modern slavery risks in relation to our contractors. The framework includes minimum labour rights standards. Our Responsible Sourcing Standard for Suppliers also outlines our minimum expectations relating to human rights, including modern slavery and child labour. Participation in our responsible sourcing programme is a mandatory requirement for suppliers which is embedded in our supplier management processes and contracting arrangements.

## Addressing risks to communities

The Social Way Policy and Toolkit requires operations to conduct 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, including economic, socio-cultural considerations, infrastructure and services, cultural heritage, community health and safety, and personal and political security impacts. One of the categories of impacts identified for management through the SHIRA process covers slavery, forced labour and child labour.

In 2023, no slavery, forced or child labour impacts were identified 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 at operations (which include consideration of community impacts) are comprehensive.





# Responsible sourcing

Anglo American has an extensive supply chain, including working with more than 13,000 suppliers across multiple geographies. These suppliers vary in reach and complexity, ranging from complex multi-national providers of mining goods and services to small-scale host-community-based suppliers. We recognise that through our relationships with suppliers, there is the potential for us to contribute to, or be directly linked to, modern slavery within the value chain and we take a range of steps to manage these risks. We also recognise that our leverage with suppliers to drive action to manage human rights risks may vary due to a range of factors, including our level of spend and whether the supplier is a tier one supplier or is deeper in 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 2023, our global procurement of goods and services with suppliers amounted to approximately \$14.4 billion (compared with approximately \$14.8 billion in 2022). We remain committed to principles of inclusive procurement in order to improve livelihoods, the skills base and economic activities in host countries through supply chain activities. To this end, we achieved significant expenditure with designated supplier groups (including Black Economic Empowerment in South Africa, Indigenous communities in Canada, and Aboriginal Suppliers in Australia) of \$3.7 billion (2022: \$3.4 billion), representing 29% of total supplier expenditure. Of this, approximately \$2.4 billion worth of goods and services were procured directly from suppliers located within host communities in the vicinity of our operations (2022: \$1.9 billion).



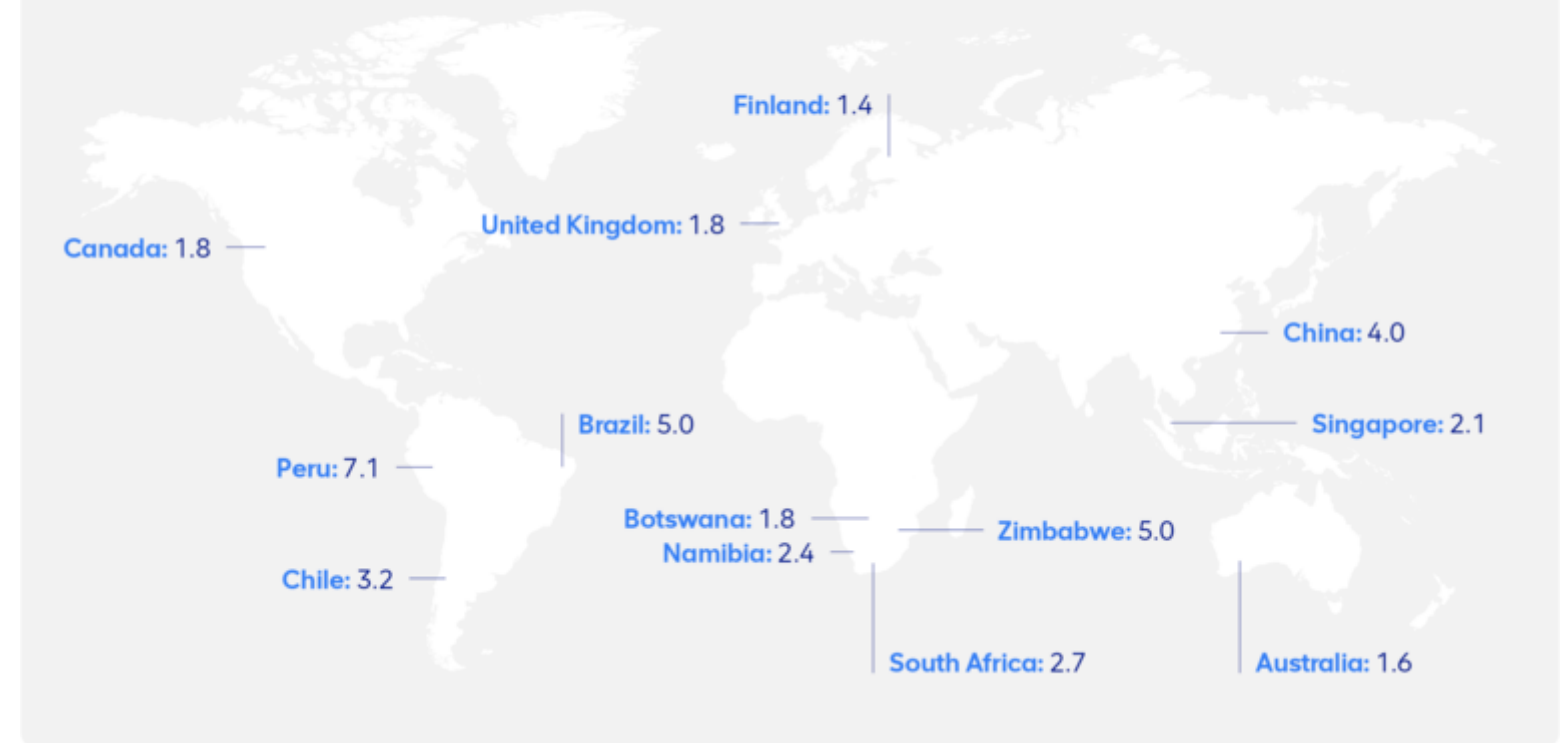
## Understanding and managing risks

The [Responsible Sourcing section of our global website](#) contains several materials, including the Responsible Sourcing Standard for Suppliers and a supplier self-assessment questionnaire (SAQ). The SAQ supports our supplier due-diligence process. Higher-risk suppliers (including those with high-value contracts or within a category which poses potential risk) and suppliers nominated by our Supply Chain team are required to complete the SAQ when requested. The SAQ is dynamic and contains various questions, including whether the supplier is aware of all risks related to forms of modern slavery and is committed to taking appropriate risk management steps within its supply chains and its own suppliers' supply chains. It also includes specific questions relating to validating workers' ages, recruitment fees, identity document retention, and loans and advances provided to workers.

In our effort to drive an inclusive supply chain, and increase the awareness of customer sustainability requirements, the SAQ platform remains free-to-use for suppliers, regardless of their turnover or complexity. We believe that making this tool available and transparent to suppliers, including prospective suppliers, enables these entities to better identify process gaps and practices which may contribute to modern slavery and broader human rights risks.

Further support for suppliers is provided in the form of introductory videos and a Frequently Asked Questions (FAQ) guide. The FAQs represents a collection of questions received from suppliers to Anglo American and De Beers related to responsible sourcing, human rights and modern slavery requirements. It continues to act as a resource for suppliers and includes information related to definitions of modern slavery, what the expectations are of suppliers and potential budgets for small and medium suppliers to cover on-site assessment costs. The support we provide to suppliers facilitates and informs our work to evaluate modern slavery and child labour

Estimated prevalence of modern slavery per 1,000 population, Global Slavery Index 2023, Walk Free Foundation



risks in our supply chains as part of assessing our broader responsible sourcing risks. In 2023, we continued to use a heat map to identify those suppliers that have an increased potential for sustainability risk. This approach considers factors such as the degree of manual labour involved in the type of work undertaken, the level of regulation in the category and risks associated with the country of origin for goods.

Where we identify or suspect a human rights risk such as modern slavery or child labour, our practice is typically to engage with suppliers to request further due diligence information. We may require suppliers to develop a corrective action plan and commit to providing regular feedback on their response. This dialogue gives suppliers an opportunity to understand and manage the risk. If a supplier refuses to remediate any actual harm, or is not able to demonstrate progress towards resolution, the matter may then be escalated, and may result in a review of the supply relationship by our Supply Chain leadership team.

More broadly, we are also working to enhance our understanding of our extended supply chains below tier one<sup>1</sup>, which we recognise is important to support our current and future due diligence activities. This includes assessing the capabilities of global service providers and enhancing the quality of due diligence and compliance related data (which could include data related to modern slavery). Mapping suppliers beyond the first tier is a complex process and we will continue to work to build our capacity in this area.

1. Our tier one suppliers are those with which we have a direct contractual relationship.

### Country risk

We use the Global Slavery Index to inform our understanding of responsible sourcing risks in the countries in which our directly managed suppliers are located. In 2023 more than 80% of our total expenditure was with suppliers located in South Africa, Brazil, Chile, Peru, Australia and Canada, although we recognise that the countries in which our directly managed suppliers are located do not always reflect the source countries from which goods and services have been procured by those suppliers.

► For more information on relevant country data  
See page 17

### Category risk

We have identified several goods and services we procure as having a higher responsible sourcing risk across several criteria. During the reporting period, we progressed work on a gap analysis of our modern slavery risk management across selected categories to help us identify opportunities for improvement.

The procurement of heavy mining equipment, including tyres and blasting equipment, forms a significant portion of our annual spend, and our 2022 modern slavery hotspot analysis identified tyres and other rubber products as a potential modern slavery risk hotspot. In 2023, we engaged with our strategic supplier partners across these categories to enhance supplier due diligence around potential modern slavery and child labour risks. This involved conversations with suppliers covering their approach to identification and management of value chain risk, including modern slavery. We also engaged internally with relevant category managers to consider key learnings from their engagement with suppliers. We have also signed a memorandum of understanding (MoU) with 10 of our strategic global suppliers to align our ambition towards sustainability and ethical value chains.

We recognise that our evolving operations and value chain may give rise to other modern slavery risks in addition to those we have currently identified. We are committed to regularly monitoring 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 within the value chains of renewable energy componentry available to the global market.

### Higher responsible sourcing risk

- Road transport
- Construction materials and services
- Load and haul services
- Contract mining
- Feeder, screens and cyclones
- Bulk chemicals
- Re-agents and frothers (including processing chemicals)
- Mine ventilation (including installation and supply of fans and extraction systems)
- Freight forwarding

### Modern slavery hotspots

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

We have identified the following goods and services that we procure as having a higher risk of modern slavery in connection with our Steelmaking Coal business in Australia:

- Electrical components
- Electrical equipment
- Explosives
- Tyres and conveyor belts
- Construction materials and services
- Equipment and parts
- Personal protective equipment (PPE), uniforms and all textile products
- Solar panels and green energy products
- Transport services (including shipping)
- Security services
- Facilities management services, including cleaning and food services.

### Safety risk

Certain goods and services are more reliant on manual labour in their value chains, which is a potential indicator of higher worker safety risk. These include goods and services that are reliant on lifting and rigging, explosives handling and hazardous materials handling. While poor management of worker health and safety standards does not itself constitute modern slavery, it can be seen as an indicator of broader labour rights risk.



### Certification schemes increase transparency around modern slavery and child labour issues

We believe participation in recognised, independent assurance programmes such as the Initiative for Responsible Mining Assurance (IRMA) promotes transparency and best practices and sends an important message to our stakeholders about our commitment to openness on responsible sourcing issues, including on issues related to forced and child labour. In 2023, our Minas-Rio iron ore operation in Brazil was one of our mines assessed against IRMA achieving the IRMA 75 level of performance. We substantially met or fully met indicators in the 'Fair labour and terms of work' section related to forced labour, child labour and trafficking of persons. The public audit report noted, "prior to supplier evaluation, the HR department conducts a due diligence process, examining the supplier's labour history, legal infringements, and interactions with the Ministry of Labor to ensure adherence to the Responsible Sourcing Standard as indicated in the Ethics Report Example (2023)". We continue to engage in the IRMA process and address and monitor the findings from audits to strengthen our approach.

## Our approach to responsible sourcing

Our commitment to responsible sourcing prioritises ethical decision making when purchasing goods and services.

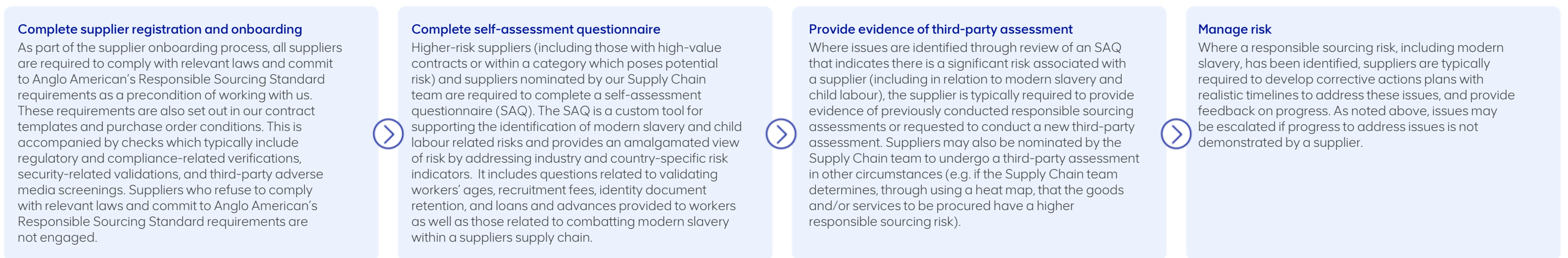
Our Responsible Sourcing Strategy consists of four focus areas:



Supported through:



Suppliers are expected to:





### Supplier capability development within the Supply Chain approach

Human rights (including relating to modern slavery) due diligence and performance requirements vary between companies and can represent significant implementation challenges for suppliers. Our approach has been predicated on supporting a wider understanding of risk, with targeted support towards suppliers. Examples of this include:

- The Responsible Sourcing Standard for Suppliers is written in clear language, with unambiguous wording for critical performance requirements and is translated into multiple languages. We continue to add information and support materials to our global website, including videos in multiple languages.
- The SAQ tool remains free-to-use for current and prospective suppliers –with our company meeting all subscription costs with the service provider.
- Since 2017, all costs associated for supplier on-site assessments have been paid for by Supply Chain. This investment in audits allows suppliers to benefit from the experience of qualified auditors who support the identification of risk.
- In 2023, two 2-day supplier workshops on Responsible Recruitment, including addressing modern slavery and child labour risks, were held at our Platinum business in South Africa. These workshops were delivered by a leading global development NGO and attended by 36 supplier representatives from small businesses.
- We continue to evolve the quality and reach of supplier materials – including implementation guides, and plan to launch online learning content in 2024.

### Self-assessment questionnaires completed in 2023

In 2023, 329 suppliers completed SAQs. A further 20 suppliers in Peru were required to complete them through our delivery partner on a separate technology platform. These suppliers were selected for engagements, as they provide goods and services in categories with higher potential for risk. These potential risk factors included higher working hours and a high volume of temporary workers.

In addition to the SAQs, we conducted 6 on-site assessments of suppliers in Brazil and undertook third-party assessments of suppliers for 13 sites in South Africa and 5 sites in Zimbabwe. Our assessments are based on principles from the ILO, the Ethical Trade Initiative (ETI) and country-specific legal requirements. To date, SAQs have been successful in identifying a limited number of poor practices by suppliers. Once identified, further clarification on responses and evidence was requested to better understand circumstances and gaps and develop corrective actions. A sample of suppliers was also included for third-party assessment to confirm that these practices were subsequently eliminated. Based on available information, we have assessed that none of these situations amounted to modern slavery. Anglo American continues to work with suppliers to strengthen overall management processes, including in relation to modern slavery.

### Strengthening our approach to responsible sourcing

We have taken a number of additional steps to strengthen our approach to responsible sourcing. As noted in the previous section, we are engaging with our strategic supplier partners to enhance supplier due diligence where we have identified potentially higher risks around modern slavery.

Further, six major multinational producers of equipment have been engaged on responsible sourcing requirements and requested to provide responsible sourcing plans up to 2027 as a precondition to participate in a global tender. We envisage that these plans will include actions related to modern slavery.

In 2022, we established a supplier partnership model whereby senior managers at sites act as liaison points between host-community suppliers, our Social Performance and Supply Chain functions. These managers identify procurement opportunities, provide performance feedback and direct potential grievances to the business. This model has been implemented in our Platinum Group Metals (PGMs), Kumba Iron Ore, and De Beers businesses in South Africa and will be scaled across all regions in which we operate. This partnership approach will help us deepen our engagement with suppliers, which may also result in opportunities to address modern slavery risks.



### Engagement with suppliers on modern slavery in Australia

In Australia, work has taken place to consolidate commitments made under our Social Way 3.0 Policy, and our region-specific Sustainable Mining Plan Reconciliation Action Plan, as well as in-country regulatory and legislative requirements, and map these to the categories of spend under management by the Australian supply chain team.

This assists supply chain professionals to categorise and prioritise the relevant social performance and human rights impacts and risks as they relate to the scope of work, and provides guidance on minimum tender response criteria requirements, and guidance on how to evaluate and validate supplier responses. This approach provides suppliers with detailed guidance on Anglo American's expectations for supplier human rights performance.

Suppliers of high-risk scopes of work, or scopes that have been assessed as socially material (i.e., likely to impact the livelihoods of the communities within our Areas of Influence), may be required to enter into a Contractor Social Management Plan (CSMP). CSMPs are negotiated as part of the contractual agreement, and performance against the agreed key indicators (KPIs) is incorporated into the existing contract performance management processes. CSMPs may be used as part of plans to address any adverse findings as part of the tender process, or as a means for contractors to commit to improvements within their operations, throughout the course of the contract.

Examples of CSMP KPIs of relevance to modern slavery include:

- Commitment to participate in Community Reference Forums for grievance management and resolution, especially where the nature of the services is likely to impact communities.
- Addressing identified failures to meet modern slavery reporting requirements under the Australian Modern Slavery Act, with time-bound commitments to achieve compliance.

Support and guidance are available to suppliers who indicate that they are unsure how to identify, analyse and remediate modern slavery risks within their operations or supply chain. This includes extending access to training and support to navigate open-source modern slavery assessment tools. This has been particularly effective when engaging small- to- medium-sized enterprises which are at an early stage in their modern slavery risk management journey, and is provided at no cost.

# Other responsible business relationships

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.

In addition to our broader procurement activities, the most material business relationships in the context of modern slavery are associated with, but not limited to, our joint-venture partnerships and our Marketing business.

## Joint ventures

Anglo American holds interests in many joint ventures, including both managed and non-managed joint ventures (NMJVs). A mining company could potentially contribute to, or be directly linked to, modern slavery through its joint ventures or NMJVs. As NMJVs represent a higher risk, we seek to influence NMJVs to adopt and implement policies meeting international best practice, especially with regard to health and safety, human rights and environmental management.

We continue to implement our guidance that sets out our expectations and preferred outcomes for the terms of NMJV agreements, including in relation to human rights (including modern slavery) issues. This supports us, among other things, to set clear expectations when entering into new NMJV agreements regarding how human rights (including modern slavery) risks should be managed.

The NMJV guidance identifies, inter alia, both required and preferred terms regarding the management of human rights risks and issues. For example, the guidance includes terms relating to:

- Human rights-related policies and procedures.
- The application of recognised international standards, such as the UNGPs and the ILO Core Labour Rights.
- Assessments and audits in respect of human rights and related issues.
- Board or committee oversight of environmental, social and governance matters.
- Supplier policies and procedures.
- Management training.



## Marketing business

We endeavour to match our commitment to reliable supply with robust assurance around responsible production, and by prioritising ethical decision making across our entire Marketing supply chain. We are building a consistent and comprehensive 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.

Our Marketing business optimises the value of our mineral resources for the benefit of all our stakeholders, including by demonstrating the high sustainability standards to which we are committed. We source and market resources from our own portfolio, as well as through complementary third-party production, with a focus on iron ore, steelmaking coal, PGMs, copper and nickel. The business meets the needs of more than 2,790 counterparties in over 80 locations by providing our physical products, logistics and technical support, as well as financing solutions.

### Counterparty due diligence

We have an integrated risk-based approach that is applicable to all our minerals suppliers. Our 'Know Your Counterparty' procedure assesses actual or potential compliance; financial and legal risks, such as sanctions; ethical business conduct; and politically exposed individuals. As noted above, suppliers are required to complete the SAQ as a pre-condition of a supplier contract.

Building on our established KYC process, we have put in place a consistent and comprehensive approach to sustainability due diligence across our structured origination deals. This includes human rights considerations such as a counterparty's commitment to the UNGPs, and whether there are any indications that the counterparty is, or has been, involved in adverse human rights impacts (including modern slavery-related impacts). This process informs Anglo American's decision making. Should a potential human rights (including modern slavery) issue be flagged during this process, we investigate how the company has addressed the issue and, where relevant, we engage further with the company around expected future actions. No modern slavery-related issues were flagged through this process in 2023.

## The 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. In line with the new commodity sourcing policy, 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.

## Responsible commodity sourcing

In 2023, our Marketing business commenced a high-level human rights due diligence project with the support of an expert third-party advisory firm. The project aims to identify salient human rights issues (including issues relating to modern slavery, forced or bonded labour and child labour) associated with our trading and shipping value chains. It will also support us to identify opportunities to strengthen our approach to managing these salient human rights issues. This work will continue into 2024.

### Acquisitions

As our business expands, evolves and acquires new assets, Anglo American could potentially become involved in modern slavery through an acquisition.

We conduct sustainability due diligence on potential acquisitions, including identifying, assessing and addressing human rights (including modern slavery) risks and issues. Our approach to sustainability due diligence when acquiring a new asset is similar to the due diligence approach described above in relation to our Marketing business. In addition, we undertake a gap and deficit analysis against our policies and procedures and put in place an action plan to close any gaps and achieve alignment with Anglo American's approach.

## Connecting society with essential resources

### Societal expectations

- Rising global population and rapid urbanisation
- Demographic and social change
- Climate change resource scarcity

### Customer needs

- A trusted partner
- Solutions designed around customer needs
- Shaping the future, together

### Commercial platform

- Product with physical characteristics that fulfil
- Customer requirements
- Service capability for a high-quality customer experience
- Production to industry-leading standards:
- Responsible and sustainable supply chain

### Tailored offering

- Tailored and integrated solutions
- Diversified mined portfolio
- Complementary third-party production

### Connecting mine to market

- Efficient and integrated processes
- Sustainable freight
- Digital and innovation
- Commercial hubs and digital global presence

### Mining

- Equity
- Third party
- A portfolio of high-quality and long-life resource assets
- Innovative practices and technologies
- Operate all aspects of our business responsibly

# Remediation processes

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

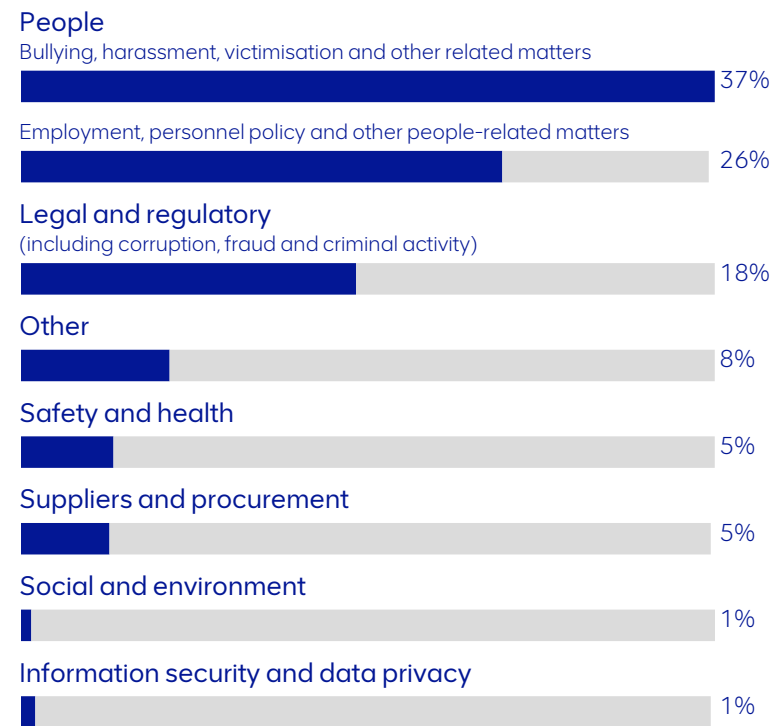
Our Whistleblowing Policy sets out our approach to reporting issues and concerns confidentially or, if preferred, anonymously. Anglo American does not tolerate any form of retaliation against anyone raising or helping to address a concern. This policy also outlines the availability and use of our YourVoice confidential reporting service, which 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. Concerns related to human rights (including modern slavery, forced labour and child labour) can also be raised through YourVoice, which is operated by an independent multilingual whistleblowing service provider.

During 2023, we received 1,403 reports through YourVoice, a 29% increase over 2022. The increase can be attributed to several awareness initiatives, including running an 'Action for Integrity' campaign in August 2023 to raise the awareness and use of the YourVoice channel.

An independent investigation team reviews the allegations. In 2023, 25% of those received were substantiated or partially substantiated. Corrective actions were taken against substantiated allegations in accordance with our policies, resulting in 182 sanctions against employees and contractors, which include 55 exits from the organisation.

Our operating assets also run site-level grievance mechanisms to allow community and other external stakeholders to raise issues with us.

## Breakdown of YourVoice reports received (%)<sup>1</sup>



<sup>(1)</sup> Computational discrepancies may occur due to rounding.

In addition to YourVoice, through our Social Way Policy, sites are required to implement grievance management procedures, and all grievances must be screened. As stated in the Social Way Toolkit, site-level mechanisms should follow the effectiveness criteria for operational-level grievance mechanisms in 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 and, if they have a social consequence of 4–5, discussed by the Sustainability Committee of the Board. No issues of that level related to modern slavery were escalated in 2023.

Our Responsible Sourcing Standard for Suppliers requires suppliers to provide or allow access to a grievance mechanism, including YourVoice.

In 2023, we received no modern slavery related allegations or reports via YourVoice and no issues reached the threshold for escalation from our site-level mechanisms. We recognise that a lack of allegations or reports of modern slavery does not of itself mean that modern slavery is not present in our operations and supply chains.

## Considering impacts on vulnerable families

Vulnerability to modern slavery and child labour can be associated with deeper structural factors, such as poverty and restricted access to education. In this context, we are conscious that measures taken to manage modern slavery and child labour risks in our operations and supply chains may have broader, unintended implications for vulnerable families and wider communities. This could involve situations where a company identified and removes child labourers from a worksite, which may result in loss of income for the families of child labourers. It could also include situations where actions to manage modern slavery risks, such as terminating a relationship with a supplier due to modern slavery concerns, leads to loss of income for the supplier's workers.

During the reporting period, we did not identify any incidents of modern slavery or child labour, and are not aware of circumstances where our broader modern slavery and child labour risk management actions may have impacted vulnerable families' income. Going forward, we will continue to consider how our risk management actions and responses to any specific modern slavery or child labour cases may impact vulnerable individuals and families on a case by case basis.

# Engagement and collaboration

Healthy stakeholder relationships help us to better understand and 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, such as modern slavery.

As identified in our 2023 Sustainability Report, key stakeholder groups for Anglo American include investors, employees, communities, suppliers and contractors, customers, civil society (NGOs, faith groups and academia), governments, and multilateral institutions and industry associations.

Matters with potential human rights implications, such as climate change, water, taxation, health and safety, livelihoods, transparency, community development and equality, are regularly discussed in engagements with relevant stakeholder groups, where relevant. Human rights as a dedicated topic of discussion takes place most frequently with civil society, suppliers and contractors, customers and investors. Our social performance teams also regularly engage with communities, formally through community engagement forums, or informally through direct outreach activities. These engagements provide opportunities for our teams to identify any potential human rights issues and, if necessary, escalate them to ensure they are addressed.

## Engagement with stakeholders on human rights and modern slavery related matters

Stakeholder	Approach	Human-rights-related matters discussed
<b>Employees and unions</b>	In 2023, we had more than 90,000 employees and contractors working for us around the world. We undertake global employee engagement surveys, the results of which are communicated to the Executive Leadership Team and the Board. The Group's Global Workforce Advisory Panel meets during the year to discuss a range of topics. Feedback from the meetings is shared with the Board and the Executive Leadership Team. Every business has formal points of contact for union engagement, and material matters are routinely reported to various boards. In 2023, we had one dialogue session 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 topics primarily related to health and safety. A similar structure has been formed at our Steelmaking Coal business in Australia.	<ul style="list-style-type: none"> <li>a. Physical and psychological safety and health</li> <li>b. Job security</li> <li>c. Organisation and workforce restructuring</li> <li>d. The future of work</li> </ul>
<b>Communities</b>	Community engagement and local accountability are central to our Social Way 3.0 and Sustainable Mining Plan. The Social Way Policy sets out requirements for stakeholder engagement in support of social and human rights impact assessments, and the management of grievances and incidents, which are aligned with the UNGPs' effectiveness criteria.	<ul style="list-style-type: none"> <li>a. Community health and safety</li> <li>b. Livelihoods and job creation</li> <li>c. Land access, displacement and resettlement</li> <li>d. Local accountability forums</li> <li>e. Grievances and incidents with social consequences</li> <li>f. Cultural heritage</li> <li>g. Collaboration in emergency preparedness planning</li> </ul>
<b>Investors</b>	Through our investor relations team we have an active engagement programme with our key financial audiences, including institutional shareholders. Significant concerns raised by a shareholder are communicated to the Board. The Board receives a briefing at each meeting from the investor relations team.	<ul style="list-style-type: none"> <li>a. Sustainability, including climate change (strategy, targets and progress), water, nature and biodiversity, and safety</li> </ul>
<b>Suppliers and contractors</b>	The Group engages with suppliers through several channels, including: supplier events; host community procurement forums; supplier capability development initiatives; various digital platforms; and our responsible sourcing programme.	<ul style="list-style-type: none"> <li>a. How to mitigate the risk of modern slavery and labour rights abuses within the supplier network</li> <li>b. Protecting the safety, health, well-being, human rights and dignity of workers employed by contracting companies and suppliers</li> </ul>
<b>Customers</b>	Our Marketing business engages with customers through direct personal engagements and via business and industry forums.	<ul style="list-style-type: none"> <li>a. Decarbonisation roadmap and carbon management solutions</li> <li>b. Assurance that products have been responsibly mined or sourced</li> <li>c. Collaboration opportunities</li> <li>d. Participation in responsible mining certification systems</li> </ul>
<b>Civil society (NGOs, faith groups and academia)</b>	Our engagement includes one-on-one interactions (including with Executive Leadership Team members); various multi-stakeholder initiatives and partnerships; addresses at civil society gatherings; and open and ongoing dialogue on tax transparency, the future of resource taxation and responsible mining practices. We host accountability dialogues on the UN's Sustainable Development Goals (SDGs), which bring together a cross-section of stakeholders around our performance related to SDGs. Any key concerns or trends from these engagements are reported to relevant executive and/or Board structures. Anglo American participates in the global Mining and Faith Reflections Initiative and the South African multi-faith 'courageous conversations' initiative, and also has longstanding partnerships with NGOs such as TechnoServe, Fauna & Flora International, Right to Care, HBGI and The Global Fund.  Our Steelmaking Coal business in Australia is a member of the UN Global Compact Network Australia and its Modern Slavery Community of Practice	<ul style="list-style-type: none"> <li>a. Climate change and Just Transition</li> <li>b. Respect for human rights</li> <li>c. Our impact on water and biodiversity</li> <li>d. Avoiding/mitigating environmental harm</li> <li>e. Investing in social and community development</li> <li>f. Critical raw materials supply chains</li> <li>g. Ethical value chains/product provenance</li> <li>h. Free, prior and informed consent</li> </ul>
<b>Governments and multilateral institutions</b>	We engage proactively with host governments at both local and national levels, as well as with other governments in countries of strategic interest – both directly and through industry bodies, and via participation in inter-governmental and multilateral processes.	<ul style="list-style-type: none"> <li>a. Stable, secure supply of responsibly sourced critical raw materials for the energy transition in an increasingly challenging geopolitical context</li> <li>b. Wider sustainability and development agenda, including climate change</li> <li>c. Contribution to national and international developmental priorities</li> </ul>
<b>Industry associations</b>	We participate in more than 130 industry associations worldwide. An audit of our memberships is undertaken and published biennially. The Group's participation is directed by our Government and International Relations Policy.	<ul style="list-style-type: none"> <li>a. Contributing to shared responses to challenges faced by governments and societies in host jurisdictions and markets</li> <li>b. General knowledge sharing on our approach to managing material issues</li> </ul>



# 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.

For Anglo American, an effective approach to managing modern slavery risks includes having:

- Clear policies that set modern-slavery-related expectations of personnel and business partners across the value chain.
- Robust due-diligence processes to identify, prevent, mitigate and account for how modern-slavery-risks are addressed.
- Processes to enable the remediation of any modern-slavery-related incidents which we identify we have caused or contributed to, including grievance mechanisms that align with the UNGPs' effectiveness criteria for non-judicial grievance mechanisms.

In 2023, quantitative measures we used to track the effectiveness of our modern slavery approach included:

- Number of KYC checks.
- Number of SAQs requested and completed by suppliers.
- Number of corrective action plans in place and completed by suppliers and counterparties.
- Percentage of employees who completed Code of Conduct training.
- Number of YourVoice cases received and issue type.
- Number of on-site assessments conducted on supplier premises.

We also monitor third-party benchmarks and other reporting about the quality of modern slavery statements in Australia and the United Kingdom. In 2023, the CCLA published a UK Modern Slavery Benchmark based on points allocated across 48 questions related to: Modern Slavery Act compliance and registry, conformance with the UK's modern slavery guidance and a "find it, fix it, prevent it" framework. Anglo American scored in the 61-80% bracket which was categorised as "Evolving Best Practice", where the Benchmark found, "Evidence of human rights due diligence practices on modern slavery informed by experts and/or civil society partners. There is evidence of activity in the find it, fix it, and prevent it categories". We will review any gaps and determine appropriate action in 2024.

Additionally, as part of the Social Way Management System, we have a Social Way Assurance Framework, which contains the requirements, criteria, and processes through which Anglo American sites assess compliance with the Social Way Policy, including in relation to SHIRA. In 2023, site self-assessments were supported by a verification exercise with relevant members of our Business and Group Social Impact team to test the results and support continuous improvement and learning. As the process was different to previous years, the data may not be directly comparable.

Our broader governance processes also include mechanisms that assist us to monitor our effectiveness. For example, Anglo American's modern slavery risk management performance is tracked as part of the Group's human rights programme by the Sustainability and Strategy function.

Due to internal organisational change and the resultant need to respond to an internal assurance efficiency review, we did not complete development of a human rights monitoring and accountability framework planned for 2023. In 2024, we will continue to work to strengthen how we track the effectiveness of our modern slavery approach, including monitoring and accountability.



# Looking forward

Despite not identifying any incidents in 2023, we recognise 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 potential for modern slavery to occur. In 2024 and beyond, we will continue to strengthen our approach to identify, assess, and address modern slavery risks in our operations and supply chains.

## Focus areas for 2024 and future years

- Progressing our gap analysis of our modern slavery risk management and identify priorities for further action.
- Updating the SAQ tool to automate feedback to suppliers based on potential risk and enhance our ability to track requests for follow-up actions with suppliers.
- Continuing to develop and launch training modules tailored to specific business functions to promote understanding of potential human rights impacts and related expectations (including in relation to modern slavery).
- Refining operational due-diligence guidance, with human rights considerations continuing to be integrated into operational and functional plans.
- Continuing to engage with our stakeholders on human rights issues, such as modern slavery.
- Commencing development of a human rights monitoring and accountability framework.
- Continuing engagement with the sector to promote consistent approaches to supplier engagement, including scope for mutual recognition of non-competitive due-diligence data.
- Continuing supplier capacity development programmes aimed at increasing suppliers' awareness, and promoting practical controls that suppliers can implement to mitigate modern slavery risk.



# Appendix I – Reporting entities

Entity	Description
<b>UK MSA reporting entities</b>	
Anglo American plc (company number 03564138)	Global mining company listed on the London, Johannesburg, Swiss, Botswana and Namibia stock exchanges.
Anglo American Services (UK) Ltd (company number 02295324)	Principal activity is an investment holding company and provides management services to certain companies in the Group.
Anglo American Marketing Limited (company number 00405724)	Principal activity is the sale of nickel, copper, and iron ore to international customers, as well as the provision of sales services for various commodities produced by the Group or sourced from third parties, and the provision of marketing and other supporting services for certain companies in the Group.
Anglo Platinum Marketing Limited (company number 06726161)	Principal activity comprises the sale of platinum group metals and associated by-products to international customers.
Anglo American Technical & Sustainability Services Limited (company number 11352289)	Provides management, technical and consultancy services to certain companies in the Group.
Kumba International Trading Limited (company number FC035694)	Principal activity is the sale of iron ore to international customers in Europe, as well as to its subsidiary Kumba Singapore Pte Ltd which in turn sells the iron ore to customers in China and other countries in Asia Pacific region. Some additional sales are made by the Company to customers in Africa, the Americas and the Middle East.
<b>Australian MSA reporting entities</b>	
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 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 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 Operations (Australia) Pty Ltd (ACN 084 204 606)	Holding company for Anglo American's manganese interests, comprising the 40% shareholding in Groote Eylandt Mining Company Pty Ltd.
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 (Jellinbah) Holdings Pty Ltd (ACN 099 344 993)	Holding company that owns 33.33% of the shares in Jellinbah Group Pty Ltd, which is not managed by Anglo American.
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 American Australia Limited (ACN 004 892 371)	Ultimate Australian holding company for the Australian steelmaking coal and corporate companies.

## Appendix II – How our statement addresses the UK MSA and Australian MSA reporting criteria

UK MSA recommended reporting criteria	Australian MSA mandatory reporting criteria	Reference in this Statement
N/A	Identify the reporting entity.	About this statement ( <a href="#">page 2</a> )
Organisation’s structure, its business and its supply chains.	Describe the reporting entity’s structure, operations, and supply chains.	About us ( <a href="#">pages 5 - 7</a> )
The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk* <i>Note: steps taken to assess and manage that risk are also described below.</i>	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Identifying, assessing and addressing modern slavery and child labour risks ( <a href="#">pages 13 - 23</a> )
Its policies in relation to slavery and human trafficking	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.	Identifying, assessing and addressing modern slavery and child labour risks ( <a href="#">pages 13 - 23</a> ), Policies and resources ( <a href="#">page 11</a> )
Its due diligence processes in relation to slavery and human trafficking in its business and supply chains		
The training about slavery and human trafficking available to its staff.		
Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Describe how the reporting entity assesses the effectiveness of such actions.	Assessing the effectiveness of our approach ( <a href="#">page 25</a> )
N/A	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 ( <a href="#">page 2</a> )
N/A	Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	Embedding our commitment across the business ( <a href="#">pages 8 - 12</a> ) Engagement and collaboration ( <a href="#">page 24</a> )

# Contacts and other information

## Group terminology

In this document, 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 herein 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 licences 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.

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## Forward-looking statements and third party information

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.

Such forward-looking statements are based on numerous assumptions regarding Anglo American’s present and future business strategies and the environment in which Anglo American will operate in the future. Important factors that could cause Anglo American’s actual results, performance or achievements to differ materially from those in the forward-looking statements include, among others, levels of actual production during any period, levels of global demand and product prices, unanticipated downturns in business relationships with customers or their purchases from Anglo American, mineral resource exploration and project development capabilities and delivery, recovery rates and other operational capabilities, safety, health or environmental incidents, the effects of global pandemics and outbreaks of infectious diseases, the impact of attacks from third parties on our information systems, natural catastrophes or adverse geological conditions, climate change and extreme weather events, the outcome of litigation or regulatory proceedings, the availability of mining and processing equipment, the ability to obtain key inputs in a timely manner, the ability to produce and transport products profitably, the availability of necessary infrastructure (including transportation) services, the development, efficacy and adoption of new or competing technology, challenges in realising resource estimates or discovering new economic mineralisation, the impact of foreign currency exchange rates on market prices and operating costs, the availability of sufficient credit, liquidity and counterparty risks, the effects of inflation, terrorism, war, conflict, political or civil unrest, uncertainty, tensions and disputes and economic and financial conditions around the world, evolving societal and stakeholder requirements and expectations, shortages of skilled employees, unexpected difficulties relating to acquisitions or divestitures, competitive pressures and the actions of competitors, activities by courts, regulators and governmental authorities such as in relation to permitting or forcing closure of mines and ceasing of operations or maintenance of Anglo American’s assets and changes in taxation or safety, health, environmental or other types of regulation in the countries where Anglo American operates, conflicts over land and resource ownership rights and such other risk factors identified in Anglo American’s most recent Annual Report. Forward-looking statements should, therefore, be construed in light of such risk factors and undue reliance should not be placed on forward-looking statements. These forward-looking statements speak only as of the date of this document. Anglo American expressly disclaims any obligation or undertaking (except as required by applicable law, the City Code on Takeovers and

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## Comments or queries related to this report

### Jonathan Dunn

Head of Climate and Human Rights

## Other Anglo American publications

Integrated Annual Report

Tax and Economic Contribution Report

Climate Change: Our plans, policies and progress

Modern Slavery Statement

Voluntary Principles on Security and Human Rights

UK Gender Pay Gap Report

Transformation Performance Report

Ore Reserves and Mineral Resources Report

## Business reports

Building Forever at [www.debeersgroup.com](http://www.debeersgroup.com)

Anglo American Platinum Integrated and ESG Report

Copper Chile Sustainability Report

Kumba Iron Ore Integrated Report and Sustainable Development Review

For the latest reports, visit:

[www.angloamerican.com/reporting](http://www.angloamerican.com/reporting)

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