

ANGLO AMERICAN PLC

WHISTLEBLOWING POLICY

1. Introduction

At Anglo American we are striving to become the leading global mining company. Our Guiding Values help to influence how we behave and interact with others. Our commitment to these values is reflected in the Group Management Committee's decision to support the establishment of the **Speak Up** whistleblowing programme.

The **Speak Up** programme is a confidential service for all employees, suppliers, business partners and stakeholders of Anglo American, including De Beers, to raise concerns about potentially unethical, unlawful or unsafe conduct and practices. It is independently managed on our behalf by an external service provider.

This policy is applicable to Anglo American plc and all of its managed operations.

2. Scope of Reportable Issues

The **Speak Up** programme provides a confidential and secure means to facilitate the raising of concerns about conduct contrary to our values and to make a contribution in those areas of our business activities where ethical behaviour is particularly important. Conduct which is contrary to our values includes:

- Actions that may result in danger to the health and/or safety of people or damage to the environment.
- Criminal offences, including fraud, bribery, corruption and money laundering.
- Conflict of interest.
- Anti-competitive behaviour.
- Failure to comply with any legal obligation.
- Misuse of company assets, including unethical practice in accounting, internal accounting controls, financial reporting and auditing matters.
- Any other legal or ethical concern.
- Concealment of any of the above.

3. Rationale for the Programme

Anglo American recognises that employees, suppliers, business partners, providers of capital, local communities and other stakeholders have a strong

preference to be associated with organisations that value and practice ethical conduct. As a means of reinforcing Anglo American's values, **Speak Up** serves to build employee, supplier and business partner loyalty through identifying and eliminating unethical practices.

The **Speak Up** programme provides a confidential means of conveying information and does not replace existing lines of communication.

4. Whistleblower Anonymity

An external and independent service provider (Service Provider) has been appointed to receive and analyse all incoming alerts from whistleblowers. The Service Provider will sanitise information received from whistleblowers before submitting it to nominated senior managers in the Corporate Office. In terms of contractual arrangements with Anglo American, it is incumbent on the Service Provider to protect the identity of the whistleblower, including never revealing the person's identity to Anglo American without that person's consent. However, Anglo American may not be able to investigate anonymous reports fully because of the inability to question the whistleblower or provide feedback. Therefore, anonymous reports may not be dealt with as effectively as direct reports to appropriate company officials.

5. Whistleblower Protection

The protection of whistle-blowers is fundamental to the success of the **Speak Up** programme. No employee who makes a disclosure in good faith, reasonably believing it to be true, will as a consequence of making the disclosure be:

- Subjected to any disciplinary action
- Dismissed, suspended, demoted, harassed or intimidated
- Transferred against his or her will
- Refused transfer or promotion
- Subjected to a term or condition of employment or retirement which is altered or kept altered to his or her detriment
- Refused a reference or provided with an adverse reference
- Denied appointment to any employment, profession or office
- Threatened with any of the above
- Otherwise adversely affected in his or her employment, including employment opportunities and work security

The aforementioned only applies if the whistleblower has disclosed his or her identity or the whistleblower's identity has become known.

The equivalent protection, where relevant, is also extended to any external organisation represented by the whistleblower.

The aforementioned protection is not afforded to an individual who has opted to blow the whistle on his or her own irregular conduct.

Deliberate reporting of false information equates to misconduct and is not protected by company policy.

6. Anglo American Commitments

- The Speak Up programme will be actively promoted in the workplace.
- All concerns submitted will be appropriately investigated and closed out.
- Individual feedback on outcomes will be provided where possible and general feedback on the programme provided on a periodic basis.
- No-one will be prejudiced for voicing their concerns in good faith.

This policy will be reviewed at appropriate intervals and revised when necessary to keep it current.