

# BUSINESS INTEGRITY POLICY



## WHAT'S CHANGED

This Policy was previously embedded in one document with accompanying Prevention of Corruption Performance Standards. Those Standards are now reclassified and referred to as separate Procedures.

References in the previous version to the Good Citizenship Business Principles have been replaced with alignment to Anglo American's Code of Conduct and Values.

[CLICK HERE TO SEE THE FULL POLICY](#)

### ALWAYS

- Fully disclose any actual or perceived conflicts of interest, involving you or a close relatives, to your line manager or any other person designated by your Business Unit or corporate entity for this purpose.
- Undertake honest and constructive engagement with our host governments and communities at all levels, consulting widely with people who are affected by our activities and interacting with governments and public officials in a fully transparent and ethical way.
- Follow the correct Group procedures for carrying out social investment, making charitable donations and agreeing sponsorships in order to ensure these transactions are free from any actual or perceived wrong-doing.
- Demand the same opposition to corruption of our contractors, representatives, suppliers and other business partners as we expect of ourselves, carrying out appropriate due diligence before engaging such third parties and enshrining this as a requirement in any subsequent contractual agreements.
- Remember you can use the Speak Up facility to report and raise concerns about conduct by anyone representing Anglo American which is contrary to our values and standards, as described in our Code of Conduct, this Policy and the accompanying Business Integrity Prevention of Corruption Procedures.

### NEVER

- Solicit, receive, offer, promise or provide money or anything of material value with the intention of obtaining a contract, permit or any other specific benefit or any improper advantage in the conduct of business, either directly or indirectly through intermediaries or other third parties.
- Offer any gift, entertainment or corporate hospitality in exchange for a contract, a permit or any other specific benefit.
- In any circumstances make donations for political purposes to any politician, political party or related organisation, an official of a political party or candidate for political office.
- Make a facilitation payment; if you feel compelled to make such a payment under duress, you must report this incident to help avoid a repeat occurrence.
- Provide company assets for the personal or discretionary use of customers, public officials or other third parties where there is no underlying proper business purpose or clear public benefit in doing so.