ANGLO AMERICAN SOCIAL WAY
OUR INTEGRATED MANAGEMENT SYSTEM FOR SOCIAL PERFORMANCE
Introduction

The Social Way is the Anglo American management system for social performance.

Our social performance activities are focused on minimising or avoiding adverse impacts and creating an environment where stakeholders affected by our operations can prosper sustainably.

We began our journey towards becoming a leader in responsible mining more than 15 years ago, with the development of the Anglo American Socio-Economic Assessment Toolbox (SEAT) and Social Way Policy. This version – the third – builds on what we’ve learned, and introduces an integrated Social Way Management System.

Effective from January 2020, it replaces both SEAT and the Social Way V2, and consists of three parts:

1. Social Way Policy
2. Social Way Toolkit

Figure 1. An integrated Social Way Management System
1. The Social Way Policy

The Social Way Policy applies to Anglo American-managed sites globally, throughout their life of asset. It provides a framework and underlying principles for social performance management, with the vision to deliver a lasting, positive contribution to local communities and those adversely affected by our activities.

The Policy applies to all Anglo American employees, contractors and suppliers, and accountability for its implementation is multi-disciplinary and cross-functional. Social Performance; Risk; Operations; Safety, Health and Environment; Security; Human resources; Legal; Mine Planning; and Supply Chain are accountable for implementing aspects of the Policy. As part of our commitment to improving standards across our industry, the Social Way Policy is available externally, in the hope that it will encourage other organisations to manage and monitor their socio-economic performance in a responsible way, and act as a model on which to base their own standards and processes.

2. The Social Way Toolkit

The Social Way Toolkit is also available externally and contains detailed guidance on the standards, processes and procedures required for sites to implement the Social Way Policy. Supplementary guidance for Discovery and Projects is also available.

The Toolkit is organised around four sections: Governance; Review and Planning; Engagement and Analysis; and Impact and Risk Prevention and Management.

Like the Policy, the Toolkit is aligned with international standards, including:

- International Finance Corporation’s Environmental and Social Performance Standards
- UN Guiding Principles on Business and Human Rights
- Voluntary Principles on Security and Human Rights
- International Council on Mining and Metal’s Position Statement and Good Practice Guide on Indigenous Peoples and Mining
- Initiative for Responsible Mining Assurance
- OECD Guidelines for Multinational Enterprises.

It has also been informed by numerous best practice guidance documents – please see the Resources section for more details.
3. The Social Way Assurance Framework

The Social Way Assurance Framework is not publicly disclosed. It contains the requirements, criteria and process through which Anglo American sites are assessed on their compliance with the Social Way Policy. All sites are assessed on an annual basis by external, independent assessors. Based on the outcomes of the assurance process, site-level improvement plans, supported by ongoing training and capacity building, are developed for continuous improvement and learning.

Alignment with Plan-Do-Check-Act process

The Social Way follows the Plan Do Check Act (PDCA) process. It outlines a methodological approach to managing social and human rights impacts and risks in a structured way and on an ongoing basis, applying the principles of continuous improvement. At site level, the Social Way is structured according to the PDCA methodology as follows:

Plan

The core of the Social Way is the identification, assessment and management of social and human rights impacts and risks as part of a site’s ongoing operational risk management process. This requires the following:

- An understanding of site activities and plans in short, medium and long-term
- An overview of the area of influence
- Relevant and recent socio-economic baseline data (comprehensively reviewed and updated at least every five years)
- An analysis of stakeholder feedback
- An analysis of grievances and incidents
- An analysis of monitoring and evaluation data
- An analysis of systemic and site-induced vulnerability
- A review of the existing assessment of social and human rights impacts and risks

This is a continuous process.

Do

A Social Management Plan (SMP), with long-term social performance objectives and an annual implementation plan, is developed and maintained based on the outcomes of the risk and impact assessment. The SMP includes a Stakeholder Engagement Plan, a Socio-Economic Development Plan and additional management plans as needed. A Stakeholder Accountability Report that summarises key elements of the Social Management Plan is disclosed every five years at a minimum so that our stakeholders can hold us to account.

Stakeholder engagement is ongoing via Community Engagement Forums, along with grievance and incident management, and the implementation of mitigation measures. The Social Performance Management Committee works to provide leadership to ensure a culture that supports effective multi-disciplinary social performance management.

Check
Management plans include a monitoring framework against which the implementation and effectiveness of mitigation measures (controls) are tracked and measured on an ongoing basis. Participatory monitoring is implemented where relevant.

**Act**

Corrective action is taken as needed based on results of ongoing monitoring and evaluation. Feedback on outcomes of social and human rights impact mitigation, and progress towards meetings long-term objectives is reported internally and externally.

**Integration**


Grievances and incidents in the social performance space are investigated and closed out in accordance with the Group Standard on Integrated Incident Management. The guidance around Contractor Social Management is designed around the Group Integrated Contractor Management Standard and, lastly, the Social Way is the key vehicle for social transition as part of the Mine Closure Toolbox.
A rights-based approach

The Social Way takes a rights-based approach. Aligned with our Human Rights Policy, respect for human rights is incorporated throughout the Social Way. For example, it underpins:

- The required approach for engagement with affected stakeholders, which is based on the principle of inclusion and diversity and must be open, meaningful, respectful and include vulnerable and disadvantaged groups.
- Site-level grievance processes, which must be legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on engagement and dialogue, and require remediation as needed.
- The methodology for identifying vulnerable groups and ensuring specific controls are designed where a site may impact on vulnerable groups.
- Processes for identifying, assessing, and addressing social and human rights impacts and risks.
- The required mitigation hierarchy approach of assessing, seeking to avoid, minimising, mitigating and then remediating potential negative impacts arising from site activities.
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1. Governance

Site leadership is accountable for providing direction, resources and management systems to effectively implement the Social Way Policy as part of an integrated approach to identifying and managing impacts and risks. Accountability implementing the Social Way Policy requirements is multi-disciplinary and includes but is not limited to: Social Performance; Corporate Relations/Affairs; Risk; Operations; Safety, Health, and Environment (SHE); Security; Human Resources; Group Legal; Mine Planning and Supply Chain (or equivalent functions).

This section provides guidance on:

- Leadership's role in delivering a site's social performance objectives, alignment with Life of Asset Plan and Anglo American’s Sustainable Mining Plan, and compliance with the Social Way Policy;
- Appropriate social performance resources, including social performance (and other functions') team size, skills and budget;
- Promoting an integrated approach to social performance, with appropriate accountabilities and reporting, through a Social Performance Management Committee (SPMC) or equivalent internal forum; and
- Overarching principles for monitoring and evaluation.

1.1 Introduction
The Monitoring and Evaluation section of this guidance defines key principles and approaches for sites. Topic-specific monitoring and evaluation guidance is provided in the relevant Social Way toolkit Risk and Impact Prevention and Management sections such as Stakeholder Engagement, Land Access, Displacement and Resettlement, Cultural Heritage (see Section 4).
1.2 Leadership and culture

Role of leadership in delivering the Social Way requirements

Embedding a multi-disciplinary approach

Performance management

The Social Way policy states that sites shall implement an appropriately staffed and qualified social performance team and provide adequate financial resources to manage social and human rights impacts, risks and opportunities in an integrated manner. In addition to supporting the implementation of social performance through properly resourced and capacitated cross-functional teams, leadership in the social performance context is about embodying Anglo American's Purpose and Values to build them into our culture. All staff have a responsibility to integrate social performance when appropriate into their work, and leaders must help to encourage and promote this through their behaviour – it starts with leadership.

Well-managed social performance activities help sites to align with Anglo American's Purpose, values and culture, and the Social Way supports sites in aligning with these critical foundations:

Social performance and our Purpose and values

Purpose: Anglo American's Purpose to re-imagine mining to improve people's lives requires sites to manage our social performance impacts, promote trust with stakeholders through transparent engagement and act fairly with external stakeholders - all critical elements supported through the Social Way.

Values: Anglo American's values promote good social performance, supported by the Social Way:

Accountability: all functions have a responsibility to help deliver on our social performance objectives and we must all take a joint accountability for the goals and outcomes we need to achieve. The Social Way promotes cross-functional accountability for social performance through the following behaviours:

I own what and how I do my work together with my team and clarify anything I am unsure of.

Applied to social performance this means that functions work together to take accountability for social performance work and clarify roles and responsibilities.
I have a ‘can do’ attitude and encourage it in others. Applied to social performance this means that functions recognise the role they have to play and positively contribute to social performance.

I have the courage to admit my mistakes and ensure we all learn from them. Applied to social performance this means that all staff report incidents and grievances and actively participate in investigations.

I go above and beyond for the good of our organisation and our stakeholders. Applied to social performance this means that staff consider the implications to stakeholders and communities in the work we do and integrate them into decision-making.

I deliver on shared commitments. Applied to social performance this means that staff work to deliver stakeholder commitments.

Care and Respect: our engagement processes should promote trust and be based on mutual respect with our stakeholders. The consideration of vulnerable groups throughout the Social Way helps to promote inclusion and diversity and achieve better social performance outcomes for our stakeholders. The Social Way promotes Care and Respect through the following behaviours:

I include and embrace diversity in all its forms. Applied to social performance this means that staff factor in consideration of vulnerable stakeholder groups in engagement activities, risk and impact management and Socio-economic development (SED) planning.

I put myself in others’ shoes and take the time to appreciate and consider their views and needs. Applied to social performance this means that staff consider how activities could be perceived by stakeholders and integrate this into impact management.

I listen to understand and communicate openly, always welcoming difference points of view. Applied to social performance this means that engagement activities are conducted in an open and transparent manner built of mutual respect.

I think carefully about the impact of what I do on others and I am open to change to achieve a better outcome for all. Applied to social performance this means that staff make decisions and work in a way that seeks to pro-actively design processes to avoid impacts to stakeholders.

I take into account the best interests of my colleagues, our stakeholders and the environmental and act accordingly. Applied to social performance this means that managing social performance impacts are integrated into operational decision-making.

Collaboration: we cannot achieve our social performance objectives in isolation and need to collaborate across many functions and with external stakeholders to achieve our goals. The Social Way promotes integration and collaboration throughout through the following behaviours:

I make decisions based on what is good for the entire organisation and our stakeholders, not my own interests. Applied to social performance this means that staff makes decisions in a way that considers impacts to stakeholders and does not only prioritise operations and production.

I believe in, trust and build on contributions of colleagues. Applied to social performance this means that all functions work together to achieve social performance objectives.

I actively listed to my colleagues align on goals and create better ways of working together. Applied to social performance this means that functions work together to optimise social performance work and seek improved performance.
I support the success of others, encourage their feedback and appreciate what we all bring. Applied to social performance this means that reporting and investigating incidents and grievances are processes that are treated as improvement opportunities and are not adversarial.

I partner and share with others, to add value and achieve our goals. Applied to social performance this means that staff recognise that many functions need to collaborate to achieve our social performance objectives.

Innovation: our continuous improvement Plan Do Check Act (PDCA) approach to social performance throughout the Social Way supports the generation of new ideas and new ways of working to progress towards our social performance objectives: I constantly search for new ways of thinking and working, experimenting and learning all the time. Applied to social performance this means that sites apply a PDCA approach to their work, making corrections based on monitoring and evaluation.

I take considered risks in pushing the boundaries, assessing where the chance to improve outweigh failure. Applied to social performance this means that sites involve social performance in the decision-making approach to consider integrated risks and opportunities.

I accept the possibility of failure and learn from it. Applied to social performance this means that, based on monitoring and evaluation, staff are empowered to re-design project and impact controls when they are not achieving the desired effects.

I simplify complexity and remove obstacles. Applied to social performance this means that staff look for opportunities to deliver value to stakeholders from our activities.

I seek out and harness inspiration from inside and outside our organisation. Applied to social performance this means that staff involve stakeholders in the decisions that affect their lives.

Integrity: acting honestly, fairly, ethically and transparently when engaging with external stakeholders demonstrates our commitment to doing the right thing. Building trust and integrity with stakeholders is a crucial element of our approach to engagement in the Social Way and is reflected through the following behaviours: I hold myself accountable for doing what I say and being clear about my motives. Applied to social performance this means that sites act in a transparent way to deliver the commitments made to stakeholders.

I do the right thing and speak up if it is not right, even when something is uncomfortable. Applied to social performance this means that sites self-report incidents and grievances even when stakeholders do not formally register them themselves.

I listen to and respect peoples' concerns with pre-judging and resolve them positively. Applied to social performance this means that sites include stakeholder feedback within the impact management process.

I never take shortcuts that could compromise the principles by which we behave. Applied to social performance this means that sites work to preserve the human rights of all stakeholders.

I do my part to help create a workplace where people do not hesitate to challenge and call out what is wrong. Applied to social performance this means that sites feel confident and able to self-report and investigate grievances and incidents.
The Social Way also aligns with the Anglo American Operating Model and includes: setting targets, assigning resources, tracking and undertaking corrective actions where required. Site leadership teams should also ensure that social performance objectives align with the relevant actions arising from the Sustainable Mining Plan, detailed for each site in the Life of Asset Plan (see Section 2).

Safety: our commitment to being unconditional about safety and to eliminating injuries demonstrates our responsibility to communities to avoid and mitigate potential health and safety impacts. The Social Way requires operations to avoid and control potential community health and safety impacts from our activities and expects sites to fulfil the following behaviours:

1. I put safety and health first in everything I do, no matter what. Applied to social performance this means that sites consider the health, safety and wellbeing of staff and communities when planning and carrying out work.

2. I do everything I can to eliminate loss of life and believe all injuries are preventable. Applied to social performance this means that sites fully consider community health and safety impacts and implement robust controls where necessary.

3. I care about the safety of my colleagues, communities and all our stakeholders as much as I care about my own. Applied to social performance this means that sites apply an unconditional approach to community health and safety management.

4. I am aware of my surroundings and what I need to do to manage risks by ensuring that critical controls and standards are in place. Applied to social performance this means that sites implement relevant community health and safety critical controls and continue to check that standards are upheld.

5. I have the courage to take action and empower others to speak up and do the same. Applied to social performance this means that sites report all grievances they receive and self-report incidents as necessary.

Culture: Anglo American promotes a high-performance and purpose-led culture of safe, responsible production. Well-planned and successful social performance activities and the tools within the Social Way help operations and leaders to align to this culture through the integration of social performance considerations in operational decision-making.
Role of leadership in delivering the Social Way requirements

Contents in this section:

1.2 Leadership and culture

Role of leadership in delivering the Social Way requirements

Embedding a multi-disciplinary approach

Performance management

Critical to the achievement of Anglo American's Purpose, values and culture is the leadership of the operational teams: General Manager, operational and support direct reports, Superintendents and Supervisors.

Supporting Operational Leadership Excellence (as part of the module related to Role and Organisational Design), the General Manager should support the following key tasks related to social performance:

1. Delivering the social performance activities set out in the Life of Asset Plan to improve social performance over time.
2. The plan should address the social performance impacts of any new developments (e.g. expansions, projects, new technologies), operational impacts (legacy, current and future) and be consistent with the site closure plan.
3. It should also enable the site to:
   - Deliver Sustainable Mining Plan commitments.
   - Lead site-specific cross-functional integration on social performance to manage relevant risks/impacts and implement management plans.
   - Ensure compliance with social performance requirements, including commitments to stakeholders.
   - Manage social performance impacts and risks as part of the asset risk management approach in a way that is aligned with Anglo American's purpose and sustainability commitments.
   - Manage social performance opportunities to create an enabling environment for the operation and improve people's lives.
   - Ensure site operations are in line with site closure plan to hand back the lease of the asset at the asset's end of life.

Ensuring processes are in place to build relationships with key local stakeholders:

- Establish site-level local engagement forums.
Considering the following points will support efficient and effective delivery of the site's social performance objectives:

- Identify high-priority engagements to manage external facing risks and opportunities.
- Participate in high-impact engagements which create a platform for the (within the context of broader stakeholder engagement plan) that establish the as the face of Anglo American with local stakeholders.
- Ensure alignment of site-specific engagement with long-term and Group Social Performance initiatives.
- Provide feedback to local stakeholders regarding the Social Performance components of the Life of Asset Plan and wider performance as required.

Leadership's role in balancing site priorities.
Site leadership need to integrate a variety of factors into decision making. Consideration of the sustainability and social performance consequences of decisions, as well as the scheduling, budgeting and production factors, is critical to understanding the full impact of our decisions and aligning with our Purpose and values and to achieving safe, responsible production.

Leadership's role and behaviours inform the culture of a site. Site leadership sets the tone for how departments approach and prioritise social performance. Integrating social performance into the Anglo American Purpose, values and culture will help to promote this. Leaders should consider the following questions to understand the ethos at their site as it relates to affected communities:

- How are local communities discussed during site meetings? Are they seen only as a risk to the business? Is there a 'them versus us' culture or are local communities seen as partners and neighbours?
- Is the Social Way understood across the site and widely referenced?
- Are social performance considerations embedded into the Life of Asset Plan and strategic long-term planning?
- Does the site aim to generate goodwill or resolve tensions through ad hoc social investments or promise of jobs or procurement opportunities, or are community programmes a part of jointly-developed, long-term initiatives?
- What behaviours and priorities are being promoted, e.g. is a production-focused culture creating undesirable community consequences?

Defining accountabilities drives cross-functional integration. Other departments should be held accountable for identifying and managing potential social and human rights impacts and risks associated with their activities, including timely corrective actions in response to grievances. Without a multi-disciplinary approach, social performance teams are sometimes assumed to be responsible for managing all interactions with communities. This often results in continual 'firefighting', with underlying issues left unaddressed, e.g. employment terms, management of environmental impacts, behaviour of security staff.

Active participation communicates importance. Leaders, especially the site , should communicate that social performance is a priority. They can talk about the social performance objectives of the site in public and staff forums, attend and support site-based training sessions and play a visible and proactive role in the .

Ensuring robust social impact and risk identification and management. Site leadership should challenge and scrutinise social impact and risk management through Operational Risk Management and insist on regular updates regarding effectiveness of mitigation measures (i.e. successfully achieving the desired impact of a control). This
should include ensuring social performance considerations are included in site operational and project planning and giving adequate time for community engagement.

Insisting on clear performance metrics for all relevant functions and teams.

The social performance team and other relevant functions should be appraised against robust performance objectives, to the same level of rigour as the rest of the business. Leadership should follow Operating Model (OM) principles and require teams to track their activities, outputs and outcomes using a management system approach. The integration of social activities and outputs in the management routines and operating master schedule can help to integrate these activities into business planning. Social performance activities should be included within staff performance targets and appraisals. Shared accountabilities and performance targets related to social performance, utilising platforms like the scorecard and operations' Teams+ shared objectives, should help to develop cross-functional performance metrics.
Table 1.1 Contribution by Function to social performance

<table>
<thead>
<tr>
<th>Function/Team</th>
<th>Potential contribution to delivering a lasting, positive contribution to local communities</th>
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<tbody>
<tr>
<td>COMMUNICATIONS</td>
<td>Leads engagement with affected and/or interested community stakeholders, including community-based organisations. Raises awareness internally and with contractors of social impacts and opportunities, and promotes (but is not solely responsible for) impact and risk identification, management, monitoring and evaluation. Coordinates implementation of a site’s socio-economic development programmes. Monitors and evaluates efficiency and effectiveness of site social performance activities against stated objectives. Promotes engagement and communication with internal and external stakeholders and supports planning and executing engagement processes. Helps to develop and disseminate internal and external communications materials to promote information sharing.</td>
</tr>
<tr>
<td>RISKS</td>
<td>Considers potential social and human rights impacts and risks and manages process to define appropriate controls.</td>
</tr>
<tr>
<td>SAFETY AND SUSTAINABLE DEVELOPMENT</td>
<td>Identifies, assesses and manages safety, health and environmental (SHE) impacts of current and planned activities on local communities. Teams may lead on community health initiatives; e.g. community road traffic safety, in coordination with the Social Performance team, and on community aspects of emergency preparedness and response planning. SHE Environmental teams will play a critical role in monitoring and evaluating potential community health and safety impacts and in developing and implementing participatory monitoring processes. May participate in incident investigation (as relevant).</td>
</tr>
</tbody>
</table>
The following questions provide a guide to identifying opportunities for improved integration of social performance across site activities:

1. How clearly are accountabilities for implementing the Social Way requirements understood by Site Leadership and Heads of Department? Are performance metrics clear?

2. Do social performance objectives support the Life of Asset Plan and operational/project priorities?

3. Are existing management systems addressing social impacts? Are control measures cross-functional, and is effectiveness of implementation (outputs and outcomes) being monitored?

4. Are community engagement roles and responsibilities clearly defined between Anglo American and any contractors, particularly at Discovery and Project Development stage? If contractors are engaging with communities, are there formal mechanisms to allow consistency of key messages and that feedback is recorded and reported back to Anglo American?

5. Does the social performance team contain people with the appropriate skills to influence, negotiate and communicate within the site organisation, as well as ‘outside the fence’?

6. Do other functions take ownership for relevant grievances and for implementation of remedial action?

GOVERNMENT

Leads engagement with elected and appointed government representatives of community stakeholders. Has a role in ensuring consistency of key messages on matters affecting local communities and as a conduit for hearing community concerns and issues.

HUMAN RESOURCES

Function will advertise roles, define hiring practices and distribution of employment, support local training / skills and capacity development, set terms of employment across the Area of Influence.

Supply Chain, in co-ordination with the Social Performance team, will define socially material contracts and set approaches for impact management. Supplier development activities will require integration with Supply Chain and Social Performance teams.

Security may be a point of contact for community members that come to our site entrances or onto our property and the behaviour of Security personnel will have a significant influence on how Anglo American is perceived by communities. Security is responsible for ensuring that security is managed in accordance with the guidance laid out in Section 4E.

DISCOVERY TEAMS

Discovery (exploration) teams will often be the first source of impacts, both positive and negative, experienced by local communities. The approach taken by Discovery teams will have a longstanding influence on how stakeholders perceive Anglo American.

PROJECT TEAMS

Capital projects can generate significant negative and positive impacts for community stakeholders. Project management teams will be responsible, with support from qualified social performance staff, for ensuring potential social and human rights impacts and risks are identified and managed appropriately.

CLOSURE

Sites are expected to follow an integrated approach to mine closure, as outlined in Anglo American’s Mine Closure Toolkit (see Mine Closure Toolkit, V3.0). A dedicated closure team may be brought in at the end of the asset lifecycle to manage closure activities. During closure phase the closure team must manage impacts appropriately. This requires engagement with stakeholders to reduce the negative impacts of social transition for the workforce and communities, and improve the legacy of benefits from mining activities.

CONTRACT OWNERS

Anglo American contract owners will contribute to delivering lasting, positive contributions to local communities through ensuring their contractor meets the commitments detailed in their Social Performance Plan and efficiently responding to grievances received through implementation of corrective actions.
7. Does the organization demonstrate awareness and willingness to communicate with site employees, contractors and interested external stakeholders on the site's long-term objectives, including social performance objectives?

8. Is social performance knowledge shared across key functions within the site and, for example, in relation to grievance management?

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Performance management

Contents in this section:

1.2 Leadership and culture

Role of leadership in delivering the Social Way requirements

Embedding a multi-disciplinary approach

Performance management

Site leadership should take an active role in defining the social performance work programme and manage it accordingly, in line with the requirements of the [insert requirements here]. Furthermore, as we implement the new Team+ approach (that shifts the focus from a backward evaluation of performance to a more dynamic future-focused, collaborative approach), there is a need to move from individual performance to a team dynamic encouraging collaboration and innovation.

Key Social Way requirements are framed against the components in Table 1.2.

Table 1.2 Alignment of Social Way requirements with the Anglo American Operating Model

<table>
<thead>
<tr>
<th>Component of Operating Model</th>
<th>Alignment with Social Way Policy implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SET BUSINESS</td>
<td>Specify what is expected from Social Performance for the success of the site and specify the Social Way performance targets</td>
</tr>
<tr>
<td>EXPECTIONS</td>
<td>Define social performance objectives, aligned with the Life of Asset Plan and incorporated into the Sustainable Mining Plan</td>
</tr>
<tr>
<td>OPERATIONAL PLANNING</td>
<td>Inform operation performance targets that rely on social performance activities.</td>
</tr>
<tr>
<td>WORK MANAGEMENT</td>
<td>Inform Set Service Strategy through the risk and impact assessment process and relevant controls, engagement planning and activities managed through the . Select the most cost-effective way to predict, prevent and/or mitigate identified risks and impacts. Agree activities (tasks) and sign-off by relevant authority to Plan approved work</td>
</tr>
<tr>
<td>OM</td>
<td>Schedule Programme through Operating Master Schedule (major projects) and provide actions in Service Work Packages</td>
</tr>
<tr>
<td>OM</td>
<td>Set Expenditure Schedule and resources for activities. Plan for the right skills in the right numbers at the right time to deliver the activities in the</td>
</tr>
<tr>
<td>OM</td>
<td>Define schedule for individual activities (tasks)</td>
</tr>
<tr>
<td>OM</td>
<td>Approve budget for delivery of individual activities (tasks)</td>
</tr>
<tr>
<td>OM</td>
<td>Staff resourcing –to deliver individual tasks</td>
</tr>
<tr>
<td>OM</td>
<td>Move from tactics to tasks and implement and associated Plans, owned by multiple functions across the site, e.g. Social Performance, Supply Chain, Security,</td>
</tr>
<tr>
<td>HR</td>
<td></td>
</tr>
<tr>
<td>SHE</td>
<td></td>
</tr>
</tbody>
</table>

Z = y
Component of Operating Model
Alignment with Social Way Policy implementation

**SMP**

**OM**

KPIs

Align with approach through:

- Defining Purpose Measures (typically lagging indicators of process performance) with Effectiveness, Efficiency and Sustainability parameters;
- Defining Theory Measures (typically leading indicators of process performance) with Technical, Strategic, Controls and Work Management measures

Evaluate outcomes of delivery against strategic objectives as identified in the Service Strategy

Analyse and Improve through corrective actions and annual Social Way assessment process – inform Social Way Improvement Plan (SWIP) and next iteration of Service Strategy, inform next iteration of Business Expectations.

Assurance of social performance through annual evaluation to provide feedback and inform the analyse and improve process.

**FEEDBACK** Inform Performance Measurement through social performance monitoring and evaluation inputs, activities, outputs and outcomes for all aspects of through performance indicators. The requires measures or for the Purpose and Theory of the process. Purpose relate to outputs and outcomes; Theory relate to inputs and activities. Social performance measures or may be selected as relevant performance measures and should be integrated as relevant (see Section 1.5 for further details on monitoring and evaluation).
1.3 Social performance resourcing

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1.3 Social performance resourcing
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Skills required in social performance team members
Team size
Social performance team performance metrics
Awareness-raising and training
Budget
External consultants and how to manage effectively

Accountability for site social performance, and compliance with the Social Way Policy requirements, sits with the mine site. The social performance team has core responsibilities in relation to the following activities:

GM Stakeholder engagement.

Lead relationships with community stakeholders, through two-way engagement relating to impacts, mitigation measures and potential benefits. Support engagement with non-community stakeholders as appropriate; e.g. with government authorities (See Section 3A).

Social and Human Rights Impact and Risk Analysis (SHIRA).

Support relevant functions and undertake accurate social and human rights impact identification, assessment and mitigation activities for all site activities in a timely manner using and Investment Development Model – Investment Criteria by Stage (ICbS) approaches (see Section 3C). Where third-party impact assessments are commissioned, confirm the approach meets the requirements outlined in the Performance Standards.

ORM IFC

Socio-economic development (SED).

Develop, implement and assess socio-economic development programmes, in conjunction with Human Resources and Supply Chain teams and others as appropriate, ensuring compliance with the principles and guidelines in (Section 4A).

Grievance management.

Develop and implement site level grievance management procedure that is accessible and understood by all stakeholders (Section 3B).

Incident investigation.

Follow the site's Learning from Incident procedure to manage incidents with social consequences (Section 3B).
Commitments management.

Compile and maintain a social commitments register and regularly track and report on progress status of fulfilling commitments.

Internal engagement.

Engage with Site Leadership team and Heads of Department to build awareness of local community dynamics, priorities, areas of concern, etc and help assess how their activities could generate social and human rights impacts that require management. Additionally, internal engagement should provide site Social Performance teams with the relevant technical information to support engagements, e.g. details of future activities, how risks will be mitigated, types of employment available and skills required.

Management reporting.

Report on at least a quarterly basis to site leadership, with meaningful performance metrics on engagement feedback, projects, grievance management, effectiveness of social and human rights impact management and implementation of commitments.

Skills and resourcing.

Propose the appropriate resourcing required, including external consultancy support, to deliver a site's social performance objectives, at each stage of the mine's lifecycle.
The external socio-economic and political context is unique to each site. However, there are core roles likely to be required in every Social Performance team, listed below. An individual may have more than one role, depending on the stage of the asset lifecycle and intensity of work programme.

- **Social Performance Manager**, with responsibilities for team resourcing, budgeting, skills development and training; ensuring implementation of social performance-led actions in the asset; supporting other functions implement actions they are accountable for; as well as monitoring progress, conducting evaluations and regular reporting to senior management.

- **Stakeholder Engagement Specialist and Community Engagement Officers**, with responsibilities for developing and implementing community aspects of the site Stakeholder Engagement Plan (SEP) (see Section 3A).

- **Impact and Risk Specialist**, with responsibilities for co-ordinating cross-functional identification of social impacts and resulting business risks, mitigation measures and indicators to track their efficiency and effectiveness (see Section 3C).

- **Grievance Officer**, with responsibilities for developing and implementing a site-level grievance management procedure and following the site's Learning from Incident procedure (see Section 3B).

- **Specialist and Officers**, with responsibilities for developing, implementing, monitoring and reporting on socio-economic development programmes (see Section 4A).

- **Monitoring and Reporting Co-ordinator**, with responsibility for developing monitoring indicators for all activities in governance.
Some phases of the mine lifecycle will require resourcing of specialist roles, which may be temporary, including:

- the Social Management Plan (SMP), in co-ordination with relevant functions that have implementation responsibilities. SMP Administrator, with responsibilities for supporting the Social Performance Manager and team with administrative duties, which may include budget tracking, arranging transport logistics, sourcing team equipment, document formatting, and data analysis to support internal reporting.

- Land Access Manager, during intense periods of land leasing/acquisition.

- Resettlement Manager to co-ordinate all aspects of physical and economic displacement of people, including identifying land and construction of new residences (see Section 4F).

- Livelihoods Restoration Manager to develop, implement and monitor livelihood-focused programmes, usually in partnership with external providers (see Section 4F).

- Impact Assessment Lead to manage social inputs to significant impact-assessment studies such as Environmental and Social Impact Assessments (ESIAs) at Project phase and closure-impact assessments towards the end of the mine lifecycle.

- IFC Engineering Procurement Construction Management (EPCM) Co-ordinator during Project phase to support Project-related engagements, check that identified impact mitigations in Environmental and Social Management Plans (ESMPs) are being implemented and benefits delivered.

- Indigenous Peoples Manager may be required to lead on forming and negotiating Indigenous Land Use Agreements, Impact Benefit Agreements and other Benefit Sharing mechanisms, e.g. community trusts (see Section 4I).

- Communications Officer, with responsibilities for developing materials such as presentations, newsletters and posters to explain and raise awareness regarding all aspects of the company's approach to social performance.

- Community Health and Safety Officer, with responsibilities for identifying adverse impacts on local communities; supporting identification and implementation of mitigation measures; and supporting development, implementation and monitoring of initiatives targeting improvements in community health (see Section 4C).

- Contractor Social Management Specialist, with responsibilities for screening contracts for social materiality, reviewing potential contractors' ability to manage potential social and human rights impacts and risks associated with their work programmes, reviewing Contractor Social Performance Plans, and conducting regular monitoring and evaluation of contractor performance against agreed requirements (see Section 4B).
Skills required in social performance team members

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Technical skills

The team’s success depends on having an adequate and appropriate level of technical expertise to respond appropriately to the site’s social performance challenges and opportunities. While these may be modified depending on the context, some typical competencies for a Social Performance Manager could include the following:

- Graduate qualification in environmental science, sociology, anthropology, natural-resource management or a related discipline.
- Demonstrated extractive and/or infrastructure sector knowledge gained through industry, financial institution or consultancy roles.
- Experience of designing Social Performance activities to deliver and maintain Social Licence to Operate.
- Implementation of Social Performance management systems and social-impact management plans across business and project activities.
- Demonstrated experience of developing and implementing community consultation plans, including grievance management.
- Experience in developing, implementing, monitoring and evaluating socio-economic development programmes.
Additional competencies for planning and implementation may also include:

Please contact Group Social Performance for standardised role profiles to support which may assist in determining the skills required to resource an effective Social Performance team.

Non-technical hiring considerations

In addition to technical skills, several complementary 'non-technical' competencies should also be sought in candidates, including:

- Understanding of environmental issues and their Social Performance implications.
- Proven delivery of succinct, analytical reports to a senior management audience.
- Experience of managing people and budgets.
- Development sector project design and management
- Collaboration skill and partnership brokering
- Management of implementation partners
- Management of complex socio-economic, political and environmental environments and the associated internal and external stakeholder relationships
- Socio-economic field research planning and implementation
- Socio-economic data analysis
- Monitoring and evaluation design and management, indicator development
- Writing skills
- Ability to integrate Social Performance across the business

To work effectively across an organisation, social performance teams should have interpersonal skills that allow them to influence, negotiate and communicate with site leadership and Heads of Departments. Consider the following when resourcing a team:

Additional 'non-technical' competencies that should be sought in candidates include strong communication and interaction skills with external stakeholders, in particular community members, ability to work under ambiguity and in

Are there individuals in the team with the ability to communicate complex community issues in a manner that the rest of the business easily understands and who are able to develop clear business cases for required management actions?

Are there individuals with deep experience of negotiation, building dialogue on complex issues, and conflict resolution?

Are there individuals in the team with strong project-management skills, including the ability to monitor and report against KPIs in a consistent manner?
Recruitment timing – right people at the right time

Link the social performance skill-sets to the relevant phase of the mining lifecycle. For example, Discovery activities will need people with land-access negotiation skills. During the transition to the Project Development phase, experience working with large-scale contractors and consultants (e.g. for development) becomes vital.

Proactive recruitment of community engagement staff allows the right people to be found, as well as time for training to build an understanding of the business, Anglo American values and site-specific key messages. A critical element of this will be developing and planning a resourcing and training / capacity development plan for social performance acknowledging the different skills and work that might be required as the operation evolves.

Recognising potential for conflict of interest

Community engagement staff can be placed in a difficult position when recruited from the Area of Influence. There can be a tension that local staff can face as the 'middle person' between their own community and their employer. It is recognised that Anglo American needs to recruit staff locally and that there are significant advantages to recruiting people from the affected/host community (knowledge of local languages and context etc). However, managers should be aware of the potential for perceived or actual conflicts of interest and the personal strain on an individual that this can bring. One way of mitigating this is to rotate staff (where feasible) and avoid giving compensation and benefit-sharing roles to persons working within their own community.

Other factors to consider when reviewing the composition of a team include:

- Does the team reflect Anglo American's inclusion and diversity principles and the diversity of host communities?
- Are there individuals in the team who are able to engage credibly with vulnerable groups, elders and traditional leaders?
- Are local languages spoken by the team to allow all community voices to be heard?
Managers responsible for recruitment should consider the following factors when deciding on the optimum team size:

- Work management – in accordance to the OM, work is planned as accurately as possible and scheduled and resourced against this. This process of planning defines the amount of time required for tasks and the suitable team size (staff or contracted) to be developed and resourced.

- How well integrated is social performance across the business? The greater the level of integration and understanding, the fewer resources required within a Social Performance team.

- What formal requirements have been placed on the site in the form of legislation, permitting requirements (e.g. project-related) and other commitments such as community agreements? ESMPs

- What level of stakeholder expectations exists for shared socio-economic development, and by whom? What business objectives will the social performance team be required to support? For example, capital projects will likely have extensive engagement requirements.

- How complex/volatile is the local community context? See box 1.1 for a simple checklist of factors that will increase complexity and therefore resourcing requirements.
Multiple recognised stakeholders competing for political power, authority, influence and benefit capture.

Complex traditional leadership structures, representation and decision-making.

Legacy issues, including those created by other extractive companies not operating to the same international standards of environmental and social performance as Anglo American.

History of limited success of external groups – e.g. other international companies, donor organisations – in delivering programmes.

History of challenging national, regional and local government relationships, and/or recent changes in distribution of authorities, e.g. devolution of powers to regional authorities.

Limited integration of area of influence economy with mainstream economy, and/or lack of familiarity with cash-based economy.

Weak governance and enforcement of rule of law.

Lack of trust.

BOX 1.1 Factors influencing complexity of external environment and resulting resourcing requirements

SED Indicators that help site leadership teams recognise whether a social performance team may be insufficiently resourced include:

1. The team is preoccupied by ‘fire-fighting’ and is not able to take a long-term, proactive approach to building and maintaining community relationships;
2. If the team has fallen behind in maintaining consultation logs and management reporting of common engagement themes;
3. If the team is overly focused on demanding external stakeholders, at the expense of spending time internally to raise awareness of social performance and to understand the engagement priorities of other departments;
4. If social impacts recorded in the site’s risk register are not regularly reviewed and updated;
5. If monitoring of social and human rights impact management is not undertaken and/or no corrective actions have been taken even when issues are highlighted;
6. If monitoring and evaluation of impact mitigation measures and programmes/projects are not conducted;
7. If a site is continuing to fail to deliver on its long term objectives and/or strategic social performance outcomes; and
8. If lessons learnt from social incident and grievance management are not recorded and communicated as learning opportunities with site leadership.
Social performance team performance metrics

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Site leadership should ensure that team performance targets and metrics are in place and that progress is reported. The following table proposes site social performance indicators that could assist in tracking, analysing and improving team performance. Social performance targets and metrics, utilising processes like the scorecard and platforms like the operations' Teams+ shared objectives, should be used to promote cross functional accountability.

Metrics are used as a means to measure performance and evaluate the success of a site in achieving a target or objective. The best performance metrics are those that are related to a specified outcome and should ideally be tied to social performance objectives. Metrics can include measures of inputs, outputs, outcomes and the impact of process (see Section 1.5 for further details) and may be:

Table 1.3 Potential social performance metrics for consideration

<table>
<thead>
<tr>
<th>Position</th>
<th>Potential metrics to measure social performance team performance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>BU Milestones: interim indicators of progress towards an outcome or result. These may be measures of progress towards inputs, outputs, outcomes and the impact of process and are often tied to a schedule (e.g. half way through a project implementation)</td>
</tr>
<tr>
<td></td>
<td>Performance metrics: indicators of completion of actions that can lead to a result. Performance metrics are typically used to track and assess the status of a process</td>
</tr>
<tr>
<td></td>
<td>Results metrics: indicators that a result or outcome has been achieved</td>
</tr>
</tbody>
</table>

1.3 Social performance resourcing
<table>
<thead>
<tr>
<th>Potential metrics to measure social performance team performance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of social performance headcount positions filled</td>
</tr>
<tr>
<td>On-time delivery of comprehensive social performance reports</td>
</tr>
<tr>
<td>to SPMC and GM</td>
</tr>
<tr>
<td>Budget expenditure against forecast</td>
</tr>
<tr>
<td>Number of training and awareness-raising sessions, including</td>
</tr>
<tr>
<td>Human Rights, members, staff and contractors</td>
</tr>
<tr>
<td>Percentage of all significant social incidents and grievances,</td>
</tr>
<tr>
<td>with supporting ‘lessons learned’ analysis</td>
</tr>
<tr>
<td>Average grievance investigation, reporting and close-out times,</td>
</tr>
<tr>
<td>as well as adherence to target</td>
</tr>
<tr>
<td>Percentage of grievances that are repeats</td>
</tr>
<tr>
<td>Percentage of incidents that are repeats</td>
</tr>
<tr>
<td>Number of social-risk/impact reviews (including monitoring</td>
</tr>
<tr>
<td>and evaluation) held during year, with corresponding changes</td>
</tr>
<tr>
<td>to risk register as required</td>
</tr>
<tr>
<td>Input, output and outcome metrics related to social and human</td>
</tr>
<tr>
<td>rights impacts and risks controls.</td>
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<tr>
<td>Feedback metrics from community perception surveys used to</td>
</tr>
<tr>
<td>evaluate outcomes of mitigation measures</td>
</tr>
<tr>
<td>Percentage of community meetings held against commitments</td>
</tr>
<tr>
<td>Average grievance-response time (measuring supporting</td>
</tr>
<tr>
<td>engagement rather than close-out)</td>
</tr>
<tr>
<td>Percentage of engagements held with corresponding consultation logs</td>
</tr>
<tr>
<td>Qualitative indicators derived from feedback from CEF</td>
</tr>
<tr>
<td>Input from sought prior to each meeting</td>
</tr>
<tr>
<td>Quantity and quality of reports to site leadership team</td>
</tr>
<tr>
<td>with update on stakeholder engagement</td>
</tr>
<tr>
<td>Evidence of participation of the intended beneficiaries of</td>
</tr>
<tr>
<td>projects in determining outcomes and their measurement</td>
</tr>
<tr>
<td>A Theory of Change exists with clearly articulated outcomes</td>
</tr>
<tr>
<td>with development outcome indicators</td>
</tr>
<tr>
<td>Corrective actions implemented following identification of</td>
</tr>
<tr>
<td>issues during periodic monitoring and evaluation</td>
</tr>
<tr>
<td>Percentage of programmes achieving expected results</td>
</tr>
<tr>
<td>Contribution of programmes to risk avoidance/mitigation</td>
</tr>
<tr>
<td>Percentage of programmes managed to time and budget</td>
</tr>
<tr>
<td>Percentage of programmes that have been evaluated by a third-</td>
</tr>
<tr>
<td>party</td>
</tr>
</tbody>
</table>

(In addition, specific projects and programmes should have their own metrics and reporting arrangements.)
Awareness-raising and training

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Leadership and training on specific social performance skills builds awareness and capacity of personnel to effectively and efficiently deliver activities in the site.

Social performance awareness-raising and training should deliver the following:

Social Performance Managers should provide appropriate training to team members, relevant employees of other functions and also appropriate contractor employees.

Furthermore, the Social Performance Manager should provide an overview of Anglo American's approach to social performance to relevant external stakeholder groups, including community leaders, local and regional government authorities, community-based organisations and labour unions. Long-term objectives should be developed in collaboration with affected communities and communicated within sites’ five-yearly Stakeholder Accountability Report (see Section 2).

Awareness of socio-economic context around mine site, including community dynamics, traditional governance structures, culture, as well as community concerns and priorities;

an understanding of multi-disciplinary roles and responsibilities in relation to achieving the Social Way Policy vision;

and consideration for how site activities can generate social and human rights impacts and opportunities, and the importance of early and ongoing engagement with a range of stakeholders across our area of influence.
The Social Performance Manager should conduct an annual training-needs assessment for the site. This assessment should compare available site team skills with the forthcoming business requirements outlined in the Life of Asset Plan. For example, if a resettlement will need to be planned during the following year, then relevant expertise may need to be brought in and complementary training will need to be provided. Training and awareness-raising materials could be developed at a site level or be sourced through internal (Group) or external resources. Resource requirements for the year ahead should be included in the annual implementation plan of the (see Section 2).
External consultants and how to manage effectively

Site teams, including social performance, are required to submit and manage an annual budget. As the team’s budget needs to be approved each year, this can have implications for delivery of a social performance work programme.

Consider the following areas of potential concern relating to annual budget-planning cycle:

1. An annual budget cycle can affect the social performance team’s ability to enter into multi-year partnerships for delivery of socio-economic development programmes with third-party providers. Social Performance Managers should try to avoid a situation where ongoing programme implementation is threatened by delays in budget approval and/or reductions or stoppage of the approved funds. They should aim to have contractual multi-year agreements signed off (or agreed in principle) by the site and relevant authority at the Business Unit level. Additionally, social performance budget items should align with activities and commitments made in the Sustainable Mining Plan and broader Life of Asset Plan.

2. Expenditure levels on projects should not be used as results metrics, as this may dilute a focus on the relevance, effectiveness and efficiency of interventions, and discourage partnerships and leveraging resources from sources other than Anglo American.

3. The site, supported by the Social Performance Manager, should ensure that all planned activities detailed in the site have a corresponding budget. Actions in the will typically be delivered by multiple functions. The site social performance-related spend will therefore be distributed across several cost centres, while site leadership should ensure that functions with implementation responsibilities have included an associated budget.

4. It is important to have the budget for activities broken down to a sufficient level of detail e.g. include details for each specific initiative and if these are tied to commitments such as permits or other legal requirements. This approach can help demonstrate all funds are pre-allocated and avoid the situation where ad hoc community projects are agreed to during the year, potentially leaving budget shortfalls elsewhere.

Consider the following checklist of items to include when putting together an annual budget:

- Governance
- Social performance resourcing
Forecast staff numbers and associated salaries; external training requirements for Social Performance team and for wider Site Leadership; projects including multi-year partnership annual payments (e.g. programmes on skills building, business support, etc) as well as Corporate Social Investment and Collaborative Regional Development (CRD) spend as relevant; external impact assessments; e.g. Project ESIA; impact mitigations; e.g. traffic-safety campaigns, contributions to social infrastructure, community health awareness-raising campaigns; technical support to be provided by consultancies; e.g. to develop a Resettlement Action Plan; logistical costs to support community engagements; e.g. printing, travel, accommodation, drinks, room hire; community engagement forum related costs; participatory monitoring costs; technical experts to support monitoring on issues of community importance; and third-party evaluation costs.
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Management should consider sourcing external consultancy support in the following instances:

- To access specialist skills to manage a particular impact or issue not currently available within the site team; e.g. livelihood-restoration programme, Site-Induced Migration Plan;
- To demonstrate that an independent approach has been used, e.g. to assess impacts through a Project-level, to conduct evaluations of programmes, to verify credibility of monitoring data; and
- To support the social performance team during a resource-intensive phase where demands on the team exceed current capacity e.g. during project construction phase.

Make sure the scope of work is clear, both in terms of activities that the consultant will undertake and the deliverables, including time-scales.

Work alongside the consultant as much as possible to share company-specific information and context to ensure the consultant's work is targeted, and to provide guidance to the deliverable is value-adding for the business.

If consultants are carrying out external stakeholder engagements, make sure that the team has a set of approved key messages for how they introduce their scope of works and/or provide community relations support. The presence of an Anglo American community relations representative will allow relationship consistency through opening and closing the meeting. However, in some cases, communities may speak more freely without the presence...
Consider at the outset which positions will be accountable for reviewing and providing feedback on consultant reports, as well as which positions will be accountable for considering and implementing recommendations arising from the assignment.
An integrated, multi-disciplinary approach is required to manage impacts and risks. To facilitate this, all sites are required to develop, document and implement site-level cross-functional Social Performance Management Committees (an SPMC) or equivalent. This section defines the purpose and scope, key activities, roles and responsibilities of an SPMC.

It is suggested that the SPMC meet monthly and should be chaired by the site Social Performance Manager or the General Manager. The SPMC should actively sponsor and promote the SPMC.

There is not a prescriptive structure that sites should adopt. Sites should ensure a multi-disciplinary committee exists that is able to meet the Purpose and Scope outlined in 4.1 and follow the topics, as considered relevant, detailed in Section 4.2.

The SPMC should typically include representation from the following:
- General Manager
- Social Performance Manager
- Production/Operations Manager
- Safety, Health and Environment Manager
- Risk Manager
- Human Resources Manager
- Contract owners for significant contracts with potential social and human rights impacts and risks; e.g. EPCM contract manager

Communications
Security
Supply Chain
Closure representative, as applicable

The activities of the support alignment with Operating Model (OM) principles by:

- **SPMC providing clarity**: Enables all functions and teams to have a clear understanding of how their own work—and their team's work—produces consistent, improving and repeatable outcomes. The SPMC should help to provide clarity on accountabilities and authorities for social performance work. It supports Anglo American’s Sustainable Mining Plan of building thriving communities with better health, education and levels of employment and the Social Way vision to “contribute to delivering a lasting, positive contribution to local communities.”

- **Promoting stability**: Through building an in-depth understanding of stakeholders and socio-economic conditions in the Area of Influence to increase the site’s ability to predict how activities will affect others—and thus predict outcomes.

- **Reducing variability**: Through embedding a culture of monitoring, evaluation and continuous improvement into site social performance activities, including through the development and review of performance indicators.
The purpose and scope of the SPMC are to:

- Help define social performance objectives for the site to support our Purpose to re-imagine mining to improve people's lives and align with relevant aspects of the site's Resource Development Plan, Life of Asset Plan and Sustainable Mining Plan. Ensure that objectives for social transition (including post-closure land use vision) are defined and considered in planning of operational activities of social performance and other relevant departments.
- Ensure social-related impacts associated with delivering Life of Asset Plan are identified and understood.
- Develop an integrated approach to impact management through developing and implementing avoidance, minimisation and mitigation measures. The SPMC should co-ordinate implementation of critical controls for Priority Unwanted Events as well as other impact management controls.
- Co-ordinate cross-functional activities and share learnings, specifically to:
  - Ensure site is prepared for transition between phases of the asset lifecycle, including (but not limited to) from Project Development into Construction, into temporary Care and Maintenance, and from Operations into Social Transition.
  - Co-ordinate activities for compliance with regulatory and permitting requirements that relate to affected community stakeholders e.g. percentage of local-employment commitments, water borehole monitoring.
  - Co-ordinate engagement with stakeholders, including affected communities, and provide a forum for internal collaboration and knowledge sharing on topics of interest e.g. water management, to allow timely and accurate external consultation.
  - Provide a forum for sharing feedback from affected stakeholders and implementing corrective action. Feedback could come from proactive engagements, grievances lodged, community protests, monitoring indicators and/or the results of periodic evaluation exercises.
Table 1.4 Documents for review

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<tr>
<th>Five-yearly</th>
<th>Annual plans</th>
<th>Issue-specific plans (where relevant)</th>
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</thead>
<tbody>
<tr>
<td>Presented, discussed and agreed following sites' five-year Social Performance Planning (2)</td>
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<tr>
<td>Presented, discussed and agreed annually</td>
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<tr>
<td>Presented, discussed and agreed as needed. Plans marked in bold are a requirement at all sites. Others are required as relevant. Annual updates and progress reports should be discussed as part of the annual implementation plan.</td>
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</tbody>
</table>

- Facilitate cross-functional incident and grievance investigations, close-out and appeals as required. Lead 'Learning from Incidents' exercises and share across the BU as considered appropriate.

- Share information between functions to assist with delivery of function-specific plans and associated impact management. Drive delivery and co-ordination where required for all site social performance actions.

- Monitor and evaluate performance and progress, specifically with regard to: activities against key performance indicators and evaluate effectiveness of projects, programmes and risk management measures against intended objectives. Support implementation of corrective actions as required.

- SMPM Performance of the overall social performance management system and progress of actions against targets.

- SWIP Discuss and agree key management documents as outlined in Table 1.4.
As with all meetings, it is good practice for the to develop an agenda and assign responsibilities (ideally in a Terms of Reference); prepare documents and circulate them in advance of the meeting; agree on decisions taken and next steps; allocate responsibilities for follow-up; and record meeting minutes.

Discussions should aim to cover the following, recognising that some items may not be covered every meeting and may be included quarterly, annually etc as relevant to the site:

- Safety Share, to include community health and safety as appropriate;
- Significant changes or developments in the socio-political context;
- Salient (potential) social and human rights impacts and risks and associated critical controls;
- Priority issues/concerns emerging from stakeholder engagement;
- Grievances or social incidents occurring and any themes; i.e. frequency of certain contractors, issues or locations.
- Progress of grievance or incident investigation and close-out, including discussion of lessons learnt;
- Progress update for Projects and any corrective actions requiring a multi-disciplinary response;
- Function-level progress update against actions they are responsible for in the and any emerging risks experienced during previous months;
- SWIP Risk Register review for accuracy of ratings used for likelihood and consequence of existing risks, as well as new risks added to the register if required;
- Review of and any evaluations undertaken, analysis and improvement identification where required;
- KPIs Review of progress against actions;

1.GOVERNANCE
1.4 Social performance management committee
On an annual basis, and as part of discussions around the annual implementation plan, the SPMC should evaluate the performance of the site against its social performance objectives. This review should be comprehensive and incorporate external stakeholder feedback.

- Any key management plans requiring formal agreement by the SPMC;
- Upcoming site activities, including any changes in schedule, and associated social performance impacts, risks and management measures;
- Social performance resource planning (time, people and skills), including site activities requiring support by community relations officers;
- Upcoming social performance training and awareness-raising sessions, as well as any training needs identified;
- Review of contractor monthly social performance reports and progress against required actions detailed in Contractor Social Management Plan. Feedback on contractor audits and assurance processes, if conducted during previous month; and
- Budget tracked against plan.

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1.5 Monitoring and evaluation

Contents in this section:

- What is meant by monitoring versus evaluation – how do they differ?
- Aligning monitoring and evaluation with Operational Risk Management language
- Considerations in monitoring and evaluation approach
- Setting indicators
- Considering vulnerable groups in monitoring and evaluation
- Participatory monitoring and evaluation

This section provides an overview of monitoring and evaluation, including why it is important, general principles, common approaches and how to set good indicators. The guidance presented here is relevant for all sections of the Social Way toolkit and is overarching. Theme-specific monitoring and evaluation guidance for social performance activities is included in separate toolkit sections.

A comprehensive approach to monitoring and evaluation is important to:

- Help reach clarity and agreement on a project/intervention's intended results (the purpose as defined in the Operating Model (OM), and how to achieve these (the theory as defined in the SP), prior to implementation.
- Inform evidence-based analysis and decision-making for ongoing improvement during implementation of project/intervention. Analysis can also inform design improvements for future projects.
- Demonstrate accountability for progress and outputs of the project or intervention.
- Support accurate reporting – both internal and external – of site progress and challenges in relation to strategic objectives.
- Collect evidence to demonstrate compliance with any related legal and/or contractual obligations and regulatory requirements such as permit conditions.

Box 1.3 Why are monitoring and evaluation important?

For Socio-Economic Development (SED), the Social Way requires sites to implement a 'Theory of Change' approach to...
planning which should also be considered as part of monitoring and evaluation. The theory of change is an approach that can be applied to projects/interventions to outline the steps required to achieve the desired outcome. As a monitoring and evaluation approach it helps sites to measure not only if a project/intervention is being implemented but if it is working to achieve the desired results. This section only includes detailed discussion of the Theory of Change within the monitoring and evaluation context. However, the application of this approach to planning is included in the section on (see Section 4A).

The monitoring and evaluation framework described in this section should be applied to:

A number of terms appear consistently in relation to monitoring and evaluation and are defined in Table 1.5.

Table 1.5 Monitoring and evaluation key terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition and example</th>
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<tbody>
<tr>
<td>Objective</td>
<td>The aim of the project/risk and impact controls i.e. what are we trying to achieve?</td>
</tr>
<tr>
<td>Target</td>
<td>A desired and measurable result expected for an indicator at a specific point of time; e.g. increase number of local businesses as registered suppliers by 50% by end of 2020. A target should include an end-point.</td>
</tr>
<tr>
<td>Milestone</td>
<td>Intermediate results showing progress towards the longer-term objective/targets</td>
</tr>
<tr>
<td>Impact (of Project / Controls)</td>
<td>Changes attributable to an intervention (e.g. a project or risk/impact controls). Impacts refer to longer-term effects of outcomes on households, communities, and society. Compared to outputs that tend to be pre-defined and can be measured objectively.</td>
</tr>
<tr>
<td>Activities</td>
<td>Actions undertaken to achieve the objective. For example, the actual delivery of business skills training or the installation of speed-awareness signs.</td>
</tr>
<tr>
<td>Inputs</td>
<td>Resources, including time, people, finances, information, expertise to deliver activities. For example, the financial cost of developing business skills training, the staff hours allocated to delivering training or the cost of traffic safety signs.</td>
</tr>
<tr>
<td>Outputs</td>
<td>Direct, measurable results derived from activities. For example, the number of people trained, the number of signs installed.</td>
</tr>
<tr>
<td>Outcomes</td>
<td>Observable changes that have occurred and can be directly linked to the intervention (e.g. a project or control). For example, increased numbers of business registrations or reductions in vehicle speeds through local communities. Outcomes are sometimes viewed as the results of an intervention over a short or medium time period, and impacts as the change over a longer time period. For example, the outcome may be increased numbers of business registrations, and impact may be increased levels of wage income in the local economy.</td>
</tr>
</tbody>
</table>

Effectiveness: The extent to which the activity or intervention has met the objective. Demonstrating direct causality with the intervention can be challenging when assessing effectiveness, as other factors typically have had an influence. An effective Project or Risk/Impact control achieved the outcomes and impact that is desired.

Indicator: A qualitative or quantitative variable used to measure the inputs, activities, outputs and outcomes etc as a result of the intervention.

SED Risk and impact controls: are we implementing them and are they working to avoid or mitigate the risk/impact?

SED projects: does the project achieve the results as planned and is it effective in achieving the expected outcomes and positive impacts?

SED Long-term social performance objectives: are we on track to achieve the objectives we set for ourselves?
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition and example</th>
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<tbody>
<tr>
<td>Key Performance Indicator</td>
<td>Critical indicator of progress towards the intended result.</td>
</tr>
<tr>
<td>Baseline</td>
<td>The reference point for a situation prior to the intervention (e.g. a Project or control), to be used to define project targets and measure progress/results of the intervention activities.</td>
</tr>
<tr>
<td>Means of verification</td>
<td>The source of data for the indicators – how the data for the indicator will be collected and calculated in a consistent way.</td>
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<td>SED</td>
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</table>
What is meant by monitoring versus evaluation – how do they differ?

Contents in this section:

1.5 Monitoring and evaluation

1. Aligning monitoring and evaluation with Operational Risk Management language

2. Considerations in monitoring and evaluation approach

3. Setting indicators

4. Considering vulnerable groups in monitoring and evaluation

5. Participatory monitoring and evaluation

Monitoring

Monitoring is defined in the Social Way as "the ongoing collection and analysis of financial and non-financial information to check performance against stated objectives, budget and work plan. Monitoring is normally concerned with inputs, activities and outputs." Monitoring presents what has been delivered and answers the question: did we do what we said we would do? In simple terms the purpose of doing monitoring is to measure if we have implemented the activities (e.g. project or risk / impact controls) that we had planned by measuring against defined indicators.

Monitoring requires defining, in advance, the target indicators for inputs, and outputs of an intervention (e.g. project or risk / impact controls). For example:

- To monitor a project related to capacity development, sites will need to define and measures progress against:
  - Inputs indicator targets: a budget of $25,000, 0.5 full-time employees dedicated to the implementing the project for two months.
  - Outputs indicator targets: 50 people to participate in the training, five separate training sessions to be delivered.

- To monitor an impact control related to mitigating the potential for vehicle accidents involving site vehicle in the community, sites will need to define and measures progress against:
  - Inputs indicator targets: a budget of $10,000, 0.1 full-time employees dedicated to setting up the control for 1.GOVERNANCE

1.5 Monitoring and evaluation
Monitoring tends to focus on progress at any given point of time against targets. Monitoring might tell us that a problem exists i.e. that an indicator is far below target, but will not give the depth of information to understand why the problem has occurred, and how it could be addressed. Monitoring is an ongoing process (e.g. monthly or quarterly) and typically undertaken by Anglo American staff and/or staff working at an external organisation in the case of a project implementer.

Evaluation

Under the Social Way, evaluation is understood as “the process of determining the outcomes of an intervention or programme, as well as its associated value for the intended beneficiaries, on the basis of systematic and regular data collection (monitoring).” Its purpose is to improve the effectiveness and sustainability of interventions (e.g. project or risk / impact controls) to inform decision-making about future plans. Evaluation goes beyond monitoring to answer the question: what has happened as a result of our activities, and has the stated objective been met?

Evaluation requires:

While monitoring focuses on tracking progress in implementation, evaluation focuses predominantly on effectiveness, sustainability and replicability i.e. have we managed to attain the results expected; will the intervention bring long-term value; and does the intervention merit repeating (on a cost-benefit basis as well as in terms of its success in achieving the desired results)? Evaluation requires defining, in advance, the target indicators for outcomes and the impact of the intervention (e.g. project or risk / impact controls). For example:

Outputs indicator targets: 15 vehicle warning signs erected, five sets of ‘speed bump’ calming measures constructed.

Analysis regarding why the intended objectives were or were not achieved; An assessment of which factors contributed or constrained achievement of the intended objectives; Consideration of what the consequences of the activity have been, both intended and unintended; and Documentation of information regarding successes, challenges, whether objectives were met or not and areas for improvement.

To evaluate a project related to capacity development, sites will need to define and measures progress against:

Outcome indicator targets: 30 stakeholders use the skills they gained to register their business with supply chain, 80% of participants indicate they have achieved the learning objectives of the training.

Impact indicator targets: Increasing percentage of local procurement delivered to local businesses, increase in average household income in targeted area (against baseline).

To evaluate an impact control related to mitigating the potential for vehicle accidents involving site vehicles in the community, sites will need to define and measures progress against:

Outcome indicator targets: reduction in relevant ‘near miss’ potential incidents recorded (compared to baseline), reduced average vehicle speed passing through relevant area (against baseline).
Evaluation should be conducted at periodic intervals as relevant for the scale and duration of the activity. In the case of longer term activities, an interim evaluation should be conducted as relevant (ensuring major flaws or problems can be addressed) with a more comprehensive evaluation undertaken on completion (informing the forthcoming year).

For specific time-bound projects (e.g., a three-year partnership to deliver skills training), a mid-term evaluation should be conducted at 18 months (or as relevant) to identify any corrective actions to improve achievement of the stated objective. A full evaluation could then be completed at the end of the programme for the purpose of assessing if the activity has adequately achieved the stated outcomes and impact. Evaluations are often completed by external organisations to bring objectivity and independence.

Figure 1.1 illustrates the different areas of focus between monitoring and evaluation.
Aligning monitoring and evaluation with Operational Risk Management language

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It should be noted that the Operational Risk Management (ORM) approach to monitoring and evaluating risk and impact controls uses specific language that should be considered when applying the approach described above:

Where necessary sites may want to conduct monitoring and evaluation using language defined as part of the system but should ensure that the approach described in Section 1.5 is implemented.

ORM

refers to Control Purpose measures: these equate to the objectives described above and should define the intended outcome of controls.

ORM

also refers to Control Theory measures: these equate to the inputs described above and should define the elements required to consistently achieve the outcomes defined in the Control Purpose. The approach suggests defining four types of control theory (or input) requirements and measures including availability, reliability, survivability and erosion factors:

- Availability: to ensure the control is present and available for use.
- Reliability: to ensure the control is able to perform its function consistently to the expected standard.
- Survivability: to ensure the control will continue to function under the operating and environmental conditions and is matched to the hazard.
- Erosion Factors: to assess what can cause the control to deteriorate or fail and how this can be prevented.
Considerations in monitoring and evaluation approach

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The following success factors are worth considering when defining the site's approach to monitoring and evaluation:

- Monitoring and evaluation should be planned for, budgeted and scheduled from the beginning.
- Monitoring and evaluation can be an opportunity for meaningful stakeholder engagement to help jointly decide what to measure and how to report, and to build trust including on corrective actions when issues are identified (more details on this provided in Section 1.5 on Participatory Monitoring). Use the Community Engagement Forum or equivalent as a mechanism for sharing monitoring results and seeking feedback on how performance could be improved.
- Baseline data for indicators should be collected to define meaningful project targets and understand the impact of the project or intervention.
- Acknowledge assumptions made in relation to the issue the project or intervention is aiming to alleviate and the anticipated results from inputs and activities.
- Recognise where other factors are influencing the issue we are seeking to address and be aware of the difference between correlation and causation.
- Monitoring and evaluation are most useful when they help inform analysis and improvement; i.e. the 'Act' element of the Plan Do Check Act framework.

Section 2 – Review Planning: Example of monitoring and evaluation framework for long term social performance
objectives. This table can also be used as the monitoring and evaluation framework for stakeholder engagement (Section 3A) and for the specific risk management and prevention plans under Section 4.

Section 3C – Social and Human Rights Impact and Risk Analysis: Example of monitoring and evaluation framework for potential impact/risk controls.

Section 4A – Socio-Economic Development: Example of monitoring and evaluation framework for Projects (which often serve as potential impact/risk controls).

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Indicators assist us to objectively measure our progress and performance towards achieving the stated objective. Indicators are used to measure the resources we have used (inputs), how we have used them (activities), what we have done (outputs) and what changes have occurred (outcomes) as a result of our intervention (impact of the intervention).

The socio-economic baseline allows for the identification of indicators for the pre-intervention status. For example: if an outcome indicator for an impact control is a reduced average vehicle speed passing through relevant areas in a community, the baseline 'pre-control' average speed will need to be known in order to measure against this indicator. In this way indicators in the monitoring framework should inform the external context review and vice versa.

Sites should consider establishing both quantitative and qualitative performance indicators. For many social performance-related interventions, qualitative indicators can provide a depth of understanding that helps us understand the effects of our interventions. For example, a quantitative indicator could be used to track the number of participants attending a community-awareness-raising workshop. A qualitative indicator would provide us with data on how useful people found the workshop, and why. As discussed below, sites should work to ensure that indicators are SMART:

**SMART indicators**

1. **Specific** – linked directly with what it is measuring;
2. **Measurable** – simple to understand/measure and indicator collection is precisely defined (what, who, how, where, when) and can be replicated; i.e. the same data will be collected independently of who is collecting it;

**BOX 1.4 SMART indicators**

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| 1.5 Monitoring and evaluation |  |

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Attainable – collection of data for the indicator must be feasible within available time, skills and financial resources;

Relevant – indicator is relevant to the inputs, activities, outputs and outcomes associated with the intervention objective; and

Time-bound – dates/time frames for when indicator is collected should be defined.

Indicators should have a means of verification, which tells you where the data or information for your indicator comes from e.g. feedback received in a survey or through discussions with affected stakeholders; data records from an environmental monitoring tool; internal records; third party study.

Indicators should have an 'owner', i.e. the position accountable for the delivery of the agreed outputs. The owner should monitor the indicator for progress against target and to identify if further corrective action is required or not.

Progress against indicators should be reported to the Social Performance team and a consolidated feedback included within the agenda of relevant meetings (as defined in advance as part of the monitoring and evaluation framework).

Compliance with regulatory, contractual and permitting requirements may require specific monitoring indicators to be adopted that are not relevant for defining inputs, outputs, outcomes or impact of interventions. These indicators will need to be monitored to reflect such compliance requirements.
Considering vulnerable groups in monitoring and evaluation

There may be individuals or groups within the site Area of Influence who are particularly vulnerable or disadvantaged and who could be impacted more severely than others or less able to benefit from positive effects of Projects. Monitoring and evaluation indicators should track how the site's social performance programme has affected these groups to understand if vulnerable groups have access to the same information, engagement opportunities and benefit projects, and that interventions (e.g. Projects and impact controls) are achieving the desired effect for vulnerable groups.

Evaluation indicators should also consider if the project or intervention has led to any unintended consequences, particularly for vulnerable groups.
Participatory monitoring and evaluation

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What is participatory monitoring and evaluation and why do it?

Participatory monitoring (and evaluation) goes beyond simply informing stakeholders of monitoring results and gives them an active role in setting targets and selecting indicators, and involves them in the process of gathering and analysing monitoring data. For some types of impacts, the consequences are so significant that the Social Way requires that a participatory approach is taken to monitoring and evaluating impact controls, for example potential impacts to Indigenous People. Further details are available in the relevant toolkit sections.

Table 1.6 explains the key characteristics of a participatory-monitoring approach compared to conventional monitoring and evaluation. The key steps in a participatory monitoring and evaluation process are shown in Figure 1.2.

Table 1.6 Conventional v participatory monitoring and evaluation

<table>
<thead>
<tr>
<th>Conventional monitoring and evaluation</th>
<th>Participatory monitoring and evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management measure, targets and performance indicators set by site or experts working on site's behalf</td>
<td>Active participation by affected stakeholders to support identification of a project or management measure to address a point of concern and expected outcomes</td>
</tr>
<tr>
<td>Monitoring activity (timing, process, tools) designed by site or experts working on site's behalf</td>
<td>Capacity building of stakeholders to enable their meaningful participation</td>
</tr>
<tr>
<td>Data collected from stakeholders</td>
<td>Involvement of affected stakeholders in developing indicators (i.e. prior to project commencement) that are meaningful to them and agreeing how and by whom the monitoring and evaluation will be done</td>
</tr>
<tr>
<td>Evaluation of results and identification of corrective actions happens internally</td>
<td>Physical presence of affected individuals at the time the monitoring takes place (e.g. when water quality samples are being collected).</td>
</tr>
<tr>
<td>Stakeholders informed of results</td>
<td>Dialogue with stakeholders on the success of the impact control or project being measured</td>
</tr>
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<td>SED</td>
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<tr>
<td></td>
<td>Facilitated group discussion on any emerging issues to help jointly address problems and identify</td>
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</tbody>
</table>

1. Governing
Involvement of affected stakeholders in participatory monitoring can reduce tensions and strengthen relationships through building ownership and accountability on issues of joint importance. By involving stakeholders in the monitoring and evaluation process you are building their capacity to understand what works and what doesn’t, which is likely to help them in future decision making. At the same time, local stakeholders may have valuable insights regarding what factors should be monitored owing to their knowledge of the local environment and communities. Information about how and why a change happened and how important that change is to those affected is also more likely to emerge through participatory monitoring. Stakeholders are also more likely to be committed to activities that they have helped develop. Sites may wish to use their Community Engagement Forum (see Section 3A) as an open and transparent approach to defining indicators, collecting data and holding subsequent discussions to increase trust levels between the company and affected stakeholders.

Key principles and considerations

Sites should consider applying the following key principles when developing a participatory monitoring approach:

1. Participation of affected stakeholders should take place at the design stage i.e. helping formulate meaningful indicators, and not just at the implementation stage.
2. Indicators should be easy to interpret and meaningful for affected stakeholders and other interested stakeholders.
3. Consider using a range of sources to collect data for indicators, to triangulate and check validity.
4. Stakeholders should be provided with a forum to take an active role in discussion of corrective actions when issues are identified.
5. Ideally, participatory monitoring should be put in place in a proactive manner for issues of known community concern and interest. When participatory monitoring is put in place in response to a conflict situation, it is more challenging to build trust.
Care is required to select appropriate and representative affected stakeholders who have the capacity to engage constructively and who are trusted by community members to speak on their behalf. The capacity of participating stakeholders may have to be built to enable effective data collection, meaningful dialogue on collected data and effective discussion of corrective actions. Appropriate resourcing may need to be made available by the site.

Consider the value of involving third parties such as NGOs or local government, jointly agreed to with affected stakeholders, in the participatory monitoring and evaluation programme.

Where participatory monitoring is established for an issue that has been the subject of significant community discontent, it is likely that early discussions may be dominated by community voicing of legacy grievances and issues. These discussions should be allowed to take place, however long they take, to lead the way for constructive dialogue and debate on the issue.

Consider how to share a summary of the monitoring data and decisions made by the participatory monitoring group with wider community members and interested stakeholders e.g. regulatory authorities.
1.6 Tools

Contents in this section:
1.1 Introduction
1.2 Leadership and culture
1.3 Social performance resourcing
1.4 Social performance management committee
1.5 Monitoring and evaluation
1.6 Tools

1 Tool 1 - Social Performance Management Committee (SPMC):
Sample Terms of Reference

1. Governance
2. Review and Planning

2.1 About Social Performance Review and Planning

This section provides guidance on sites' social performance review and planning. Anglo American is committed to building sustainable and mutually beneficial partnerships with potentially affected stakeholders across the Life of Asset (LoA). This requires a long-term vision, defined through collaboration, informed by a deep understanding of our context and our stakeholders, and shaped by the potential impacts we may have and the opportunities we can create.

Specifically, this section:

**Intended users**
The site's Social Performance team is the primary intended user of this section. The Safety, Health and Environment (SHE) team has important responsibilities particularly in relation to environmental and health baseline data gathering and analysis. Supply Chain, Human Resources, Life of Asset Planning, Finance and Operations also have roles to play in social performance review and planning.

**Relevance to other sections**
This section provides guidance on sites' approach to social performance, providing both the long-term vision and the requirements for:
- Conducting both an internal and external context assessment
- Collecting social baseline data and identifying a site's Area of Influence
- Detailing the requirement for a Social Management Plan (SMP) and Stakeholder Accountability Report (SAR)
- Clarifying the content and structure for the SMP
- Identifying the relationship and synergies between the SMP, the Life of Asset Plan (LoAP) and the Sustainable Mining Plan

This section provides guidance on embedding social performance into sites' business planning cycles.
data that underpin all the sections of the Social Way; from engaging stakeholders to identifying and managing impacts to value creation.

Frequency and timing

Social performance review and planning is an ongoing and iterative process because it is based on a constantly changing internal (i.e. site plans and activities) and external (i.e. local community) context.

The is a living document, subject to a substantial refresh every five years following review/update of the external and internal context analysis, or more frequently if significant changes in external and/or internal context or in business objectives occur.

The main deliverables of social performance review and planning are the and the:

Governance (Section 1) – the should inform longer-term and short-term needs for social performance staffing and budgeting. The Social Performance Management Committee (SPMC) should contribute to the development of the

Engagement and Analysis (Section 3) – it is important to maintain an up-to-date understanding of potentially affected stakeholders in order to inform the site's Area of Influence and the vulnerability assessment.

Incident and Grievance Management (3B) – long-term social performance objectives should be informed by trends and patterns of incidents and grievances.

Social and Human Rights Impact and Risk Analysis (3C) – the internal and external context assessment inform the annual Social and Human Rights Impact and Risk Analysis (SHIRA), as well as the development of effective controls. The long-term approach to impact and risk management and a summary of the priority actions to manage the key potential social and human rights impacts and risks should be included in the.

Impact and Risks Prevention and Management (Section 4) – as part of social performance review and planning, sites conduct a screening exercise to identify which of the Impact and Risk Management and Prevention sections apply. Certain topic specific management plans may be annexed to the.

The summarises the context and baseline, lists long-term social performance objectives, key social and human rights impacts and risks, and provides an overview of site-level resourcing. The also includes an annual implementation plan, which should be updated every year as it reflects the priorities and activities for the forthcoming year, and includes a summary of key commitments and their status. The commitments register should either sit as an Annex to the or be managed in an online register and referenced in the.

The is a publicly available report that summarises the for external stakeholders, providing transparency and accountability on a site's social performance. The is to be updated and disclosed to local communities and other interested stakeholders at least every five years.
2.1 About Social Performance Review and Planning

Social performance review and planning encompasses the identification of appropriate, long-term, and strategic social performance objectives. It helps to deliver on Anglo American's Purpose 'to re-imagine mining to improve people's lives.'

Long-term social performance objectives are set based on an understanding of the internal and external context, an analysis of stakeholder engagements and a review of grievances and incidents. Planning and review also support the development of an annual implementation plan to work towards achieving those objectives and to manage potential social and human rights impacts and risks.

Figure 2.1 provides an overview of the social performance review and planning process, including key inputs (baseline and context review; review of findings from stakeholder engagement, incident and grievance management and) and outputs ().
The Sustainable Mining Plan goes beyond compliance with legislation or regulatory requirements and comprises mutually reinforcing elements that will positively transform how our stakeholders experience our business, both locally and globally. The Sustainable Mining Plan is built around three global sustainability pillars (Trusted Corporate Leader, Thriving Communities and Healthy Environment) and is underpinned by our Critical Foundations which are common minimum requirements. The Social Way is one of the Critical Foundations of the Sustainable Mining Plan. A core element of the Sustainable Mining Plan is to bring long-term and sustainable development opportunities to the regions around our operations through Collaborative Regional Development.
Every Anglo American-managed operation is required to develop a five-year sustainability plan that delivers the detailed implementation plans for achieving the Sustainable Mining Plan pillars and stretch goals. The five-year sustainability plans should be aligned with and integrated into the site’s Life of Asset Plan.

A site’s Life of Asset Plan (LoAP) is typically updated every three to five years or as significant changes occur in business context or objectives. The process is described in Figure 2.2. It is highly collaborative and includes multiple approval and review points, in which the Social Performance team should participate.

The key deliverables and activities for the Social Performance team are as follows, explained in more detail below:

- **LoAP Terms of Reference (ToR)** – providing input into the ToR for the LoAP, which provides strategic direction and scope for the development of the LoAP from a social performance perspective.
- **Design Criteria Proforma (DCP)** – writing the DCP for Social Performance, which provides planning input, assumptions and constraints for the development of the LoAP.
- **Review** – participating in the cross-functional mine design and risk reviews with the objective of reviewing the draft LoAP from a social performance risk and impact perspective.
- **Social Performance Implementation Plan** – writing the Social Performance Plan, which includes an implementation plan, schedule and cost estimate for delivering the social performance aspects of the LoAP.
- **Social Performance Chapter of the LoAP Report** – writing the Social Performance Chapter of the LoAP Report, which provides an overview of the key social performance issues, objectives, milestones and plans for delivering the LoAP.
- **Integration into Site Plans and Budget** – ensure that the social performance activities required to deliver the LoAP are integrated into site-level plans and resourcing, including the Social Management Plan.
Terms of Reference

In order to prepare the draft, the team needs to understand the site's external context (see 2.2 Task 3) and its commitments register. The existing long-term social performance objectives (see 2.2 Task 5) can also be informative in preparing the draft. These issues should therefore be included in the Terms of Reference of the draft.

Design Criteria Proforma

The Design Criteria Proforma (DCP) follows a set format for inclusion of design criteria, considerations and requirements to be considered in the development of the draft. Sites should include:

- Relevant context and baseline information: a summary of key issues and developments in context and baselines, to provide the team with an understanding of the social environment that may be affected or that may pose a risk to the business.
- Constraints and opportunities: an overview of specific social performance constraints (including commitments made) and opportunities that need to be considered to deliver the draft, including:
  - Commitments made to stakeholders that may restrict or limit planning i.e. agreements to only blast at certain times; agreements on limits to dust, noise, vibrations or other impacts; agreements to employ certain numbers or percentages of host community members; agreements related to land use; etc.
  - Limits to accessing land i.e. areas being used by community members for economic or livelihood purposes; areas being used by community members for residential purposes; the timing, costs and requirements for accessing certain portions of land through securing lease agreements or purchasing property; etc.
  - Areas identified as cultural heritage or sites of cultural or archaeological importance and associated buffer zones. Where relevant this may include time, costs and requirements should permits be required for relocation or removal.
- Key potential social and human rights impacts and risks to the business associated with the delivery of the draft.
- Budgetary and scheduling implications to deliver the draft.

Identify opportunities to minimise adverse impact and maximise stakeholder value.

Identify potential adverse social and human rights impacts on external stakeholders associated with new or changed activities proposed in the draft (e.g. a proposed increase in the size of a waste-rock dump may require land acquisition, resulting in physical or economic displacement).

Identify potential risks to the business (e.g. an increase in the amount of site traffic in local communities arising from construction activities may result in community protests where local communities have previously indicated that they...
Where potential significant adverse impacts to external stakeholders, risks to the business, and/or implications in terms of timelines and resourcing are identified, these must be communicated to the team and the so that:

Social Performance Implementation Plan

The site's social performance team should write the Social Performance Implementation Plan, which includes an implementation plan, schedule and cost estimate for delivering the social performance aspects of the.

Social Performance Chapter Report

The site's social performance team should write the Social Performance Chapter of the Report, which provides an overview of the key social performance issues, objectives, milestones and plans for delivering the.

Integration into Site Plans and Budget

Once aligned and approved in the, the Social Performance requirements identified must be translated into the 5-year business plan and budget owned by the site's General Manager. It is through the annual planning cycle that business objectives are operationalised in line with the Anglo American Operating Model. The Social Performance team supports this process by providing the necessary budget and resourcing inputs for the plan, with input from and Group as required.

The social performance implications of the final should also be reflected in the social performance review and planning process and in the. In some cases, for example, this could mean that long-term social performance objectives need to be updated (see 2.2 Task 5), or that new or different baseline data needs to be collected (see 2.2 Task 5). In other cases, no additional activities may be necessary.

Lifecycle planning

Social Performance Review and Planning should begin early in the Project Development phase and continue until Post-Closure.

Identify any conflicting or opportunistic aspects relevant to the Sustainable Mining Plan stretch goals, current progress against targets and any potential impact of the on achieving these targets.

Identify key requirements for creating an enabling environment and supporting the implementation of the.

Identify the implications in terms of required social performance activities, timelines, and resourcing to deliver the draft (e.g. the construction of an access road may require an Environmental and Social Impact Assessment and community consultation which might impact schedule and budget).

Adjustments can be made to the activities, schedule, and/or budget, in order to avoid or reduce potential adverse social and human rights impacts and risks to the business and include adequate time and budget for analysis and relevant controls.

There is internal awareness of, and agreement on, the implications of the in terms of potential social and human rights impacts, risks to the business, social performance budget, and required timelines.
Social Performance Review and Planning needs to reflect an appropriate level of consideration for future lifecycle transitions. Significant changes or developments within each lifecycle stage (e.g. stay-in-business or expansion projects) should be considered.

Planning for social transition (i.e. mine closure) should be incorporated in initial project design and throughout the operations phase. With five years of life of mine remaining, a Closure Social Impact Assessment must be completed. The results of the Closure Social Impact Assessment should be incorporated into the... sites in Care and Maintenance are not required to undertake full Social Performance Review and Planning (e.g. baseline updates, long-term objectives) but should continue to produce an annual implementation plan as part of the... Some programmes, such as local supplier development and local employment programmes, may need to commence to create an enabling environment for the Project.

Social performance capability, including resourcing, systems and processes, should be commensurate with the context and level of potential impacts and risks. Relevant Sustainable Mining Plan goals and milestones should be included during project planning.

Project-specific requirements on social performance review and planning, impact and risk assessment, and stakeholder engagement for Projects is provided in the Investment Development Model's Investment Criteria by Stage and associated guidance.

With a ramp-up and change in site activities during the construction phase, risks and potential impacts must be carefully managed. Potential social and human rights impacts and risks during construction depend on context, but typically include an increase in traffic on public roads, risks and potential...
Social performance review and planning should recognise that lifecycle stages are not always linear; for example:

- Impacts related to worker accommodation, contractor social management, security, site-induced in-migration, conflict, security, social land management, environmental impacts, etc.

Social performance capability, including resourcing, systems and processes, should be commensurate with the context and level of risk and potential impacts of the construction activities. The size of the Social Performance team or other social performance-related resources and support is typically larger during construction and operations compared with Discovery and Project Development.

- Annual analysis of potential social/human rights impacts and risks, and implementation of mitigation/enhancement measures related to construction activities.

- Ongoing stakeholder engagement via the Community Engagement Forum and other relevant stakeholder engagement approaches, including grievance and incident management.


- Social performance capability, including resourcing, systems and processes, should be commensurate with the context and scale of impacts and risks.

- Annual analysis of potential social and human rights impacts and risks, and ongoing implementation of mitigation/enhancement measures related to operational activities.

- Ongoing stakeholder engagement via the Community Engagement Forum and other relevant stakeholder engagement approaches, including grievance and incident management.

- Implementation and ongoing planning and development of long-term sustainable projects continues.

- Significantly reduced activities and number of workers on site typically results in a reduction in social and human rights impacts and risks.

- Social performance capability, including resourcing, systems and processes, should be commensurate with the context and level of potential social and human rights impacts and risks. This capability may reduce significantly if a site is on Care and Maintenance.

- Annual analysis of potential social/human rights impacts and risks, and ongoing implementation of mitigation/enhancement measures as relevant to the Care and Maintenance context.

- Regular but reduced stakeholder engagement via the Community Engagement Forum and other relevant stakeholder engagement approaches, with the aim of maintaining stakeholder relationships and informing them of developments and timings. Ongoing grievance and incident management is needed.

- Implementation of long-term sustainable projects may or may not continue. Delivery of short-term projects to ensure continued support by communities may or may not be needed.

Social transition planning requires extensive social performance capability, resourcing, and systems, which, depending on context, may be transferred to a nearby site or level at the end of production and scaled down during the monitoring and maintenance phase. A minimum level of social monitoring activities is likely to continue until relinquishment, depending on context.

Further guidance on social transition planning, including requirements for impact and risk assessment, stakeholder engagement, and input into a closure plan, depending on years remaining to closure, is provided in the Anglo American Mine Closure Toolbox (MCT), and the Investment Development Model's Investment Development Criteria by Stage closure requirements.

- A site must be actively planning for social transition, beginning in the Project Development phase. The Social Performance team should be involved in the development of social and human rights impact and risk assessments related to social transition (e.g. out-migration, reduction in employment opportunities, including through discussions with stakeholders), and should include social transition-related activities in the Stakeholder Engagement Plan (SEP) during operations.

- A site in operation may have various projects in study phases or in execution (e.g. stay-in-business projects, incorporation of new technologies, addition of infrastructure such as concentrators, tailings storage facilities, waste rock dumps, etc). These should be included as part of the process as appropriate and may require stakeholder involvement.
engagement, planning and assessment from a social performance perspective as they may have associated social risks, impacts and opportunities that require assessment and management. The Social Performance team should be involved in project development and use its knowledge of the site's stakeholders and social and human rights impacts and risks to inform decision-making. The site's and should reflect integration with Projects where relevant.

A site in operation may have exploration activities ongoing in an adjacent area, managed by the site or the Discovery team. The operation's Social Performance team may not be responsible for social performance and stakeholder engagement activities related to such exploration activities. At a minimum, however, it should be aware of these activities and co-ordinate with the Discovery team to inform its stakeholder engagement and social and human rights impact and risk analysis.

Social Transition planning should be conducted and integrated into the from the Project Development phase and continue throughout Operations, with the aim of leaving a positive legacy and avoiding dependence on the site; i.e. diversification of the local economy away from mining. The baseline data collected for ongoing social performance review and planning will inform strategic planning for social transition (see Tool 1 of the Mine Closure Toolbox (MCT)).

Key aspects to consider in social performance review and planning for social transition include:

- What activities are required to enable co-definition of a closure vision, post-mining land use and social transition success criteria with stakeholders? For example, is capacity building needed, and does the scope of the external context review undertaken as part of Review and Planning provide the required information to inform planning for social transition? (see Tool 1 and 2).
- Do long-term social performance objectives and associated management actions align with the mine closure vision and post-mining land use plan?
- Are commitments related to social transition captured in the site's commitments register?
- Have social aspects been incorporated into the Mine Closure Plan to the required level of detail (i.e. preliminary, draft, detailed, final) and does this align with the? Have any gaps related to social aspects in the closure plan been identified and are actions to close those gaps included in the (see Tool 2 of the MCT)?

With five years life of mine remaining, a closure phase Social Impact Assessment will need to be undertaken and the updated for social transition accordingly.

Note that the scope for 'social' in the Mine Closure Toolbox includes impacts on employees. Assessment and planning for workforce transition and management of closure impacts on employees is the responsibility of Human Resources, with support from and alignment with the Social Performance team as needed. For example, interventions for alternative livelihoods will likely be led by the Social Performance team, whereas portable skills programmes may be a joint effort or HR-led. HR leads on engagement with employees relating to social transition and should provide the relevant inputs for those aspects under their responsibility into the social part of the Closure Plan.
The Social Way follows the Plan Do Check Act (PDCA) management technique. The guidance in this sub-section is structured accordingly. Note that while the tasks are presented in sequence some may overlap.
Task 1: Conduct screening

Contents in this section:

Task 1: Conduct screening

Task 2 – Conduct internal context review

Task 3 – Determine the Area of Influence

Task 4 – Conduct external context review

Task 5 – Assess systemic vulnerability

The PLAN stage includes data collection and analysis that forms the basis of social performance review and planning and management.

Changes in the internal context (see 2.2 Task 2), the Area of Influence (see 2.2 Task 3), the external context (see 2.2 Task 4), and in systemic vulnerability (see 2.2 Task 5) should be reflected, as appropriate, in the site's:

Task 1: Conduct screening

Sites should conduct a screening exercise to determine which of the topics covered in Section 4, Impact and Risk, Prevention and Management, should be screened into their social review and planning process. These topics include:

- socio-economic development (see Section 4A)
- contractor social management (see Section 4B)
- community health and safety (see Section 4C)
- emergency preparedness and response planning (see Section 4D)
- security management (including the Voluntary Principles on Security and Human Rights) (see Section 4E)
- land access, displacement and resettlement (see Section 4F)
- site-induced migration (SIM) (see Section 4G)
- cultural heritage (see Section 4H)
- Indigenous Peoples (see Section 4I)
- conflict management (see Section 4J)
- artisanal and small-scale mining (see Section 4K)

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- Long-term social performance objectives (see 2.2 Task 6)
- Social Management Plan (see 2.2 Task 7)
- Stakeholder Engagement Plan and activities (see Section 3A)
- Assessment of potential social and human rights impacts and risks (see Section 3C).
Screening should be conducted at a minimum every five years as part of the internal and external context review update (see 2.2 Tasks 2 and 4). The screening exercise should be conducted more frequently as needed; for example, where there are significant changes in the [LoAP BU SHIRA], or where it is evident from monitoring and evaluation processes that a topic previously screened out should now be screened in.

A screening tool that explains how to determine whether the topics covered in [Section 4] should be screened in or out is included in Tools. Sites should consult with [LoAP BU SHIRA] and Group Social Performance when using this tool and determining what is screened in or out. Note that socio-economic development, contractor social management, community health and safety, emergency preparedness and response planning, and security management and the Voluntary Principles on Security and Human Rights are always screened in.

Screening requires an understanding of the internal context (see 2.2 Task 2), the Area of Influence (see 2.2 Task 3), and the external context (see 2.2 Task 4). Where a topic is screened in, the relevant [Section 4] chapter provides guidance on any specific baseline data to be collected as part of the external context review (see 2.2 Task 4). In case a topic is screened in, it should subsequently be assessed as part of [Section 3B; A - SHIRA]. However, the social and human rights impacts and risks covered in [Section 4] are not limited to the topics covered in [Section 4]. Sites should use the Social Consequence Matrix (see [Section 3B] or [Section 3C]) to assess the full range of potential social and human rights impacts and risks.
Task 2 – Conduct internal context review

Contents in this section:
Task 1 – Conduct screening
Task 2 – Conduct internal context review
Task 3 – Determine the Area of Influence
Task 4 – Conduct external context review
Task 5 – Assess systemic vulnerability

Social performance management is shaped by the internal context. From changes to site-level activities through to revised Group-level policies or strategic priorities, a site's potential impacts on, and commitments to, external stakeholders are constantly evolving.

The internal context review is updated as needed on an ongoing basis, and more comprehensively refreshed every five years at minimum.

Box 2.2 summarises the elements that should be considered in the internal context review.

INTERNAL CONTEXT

| Legal and permitting requirements, including those related to socio-economic development (SED) |
| Business priorities |
| Production objectives |
| FutureSmart Mining initiatives / Social Licence to Innovate |
| Permanent, temporary employees and contractors, including their accommodation arrangements |
| Planned expansion |
| Lifecycle transitions |
| Land-acquisition plans, changes in land use |
| Anticipated recruitment |
| Planned infrastructure/changes to haul or transport routes |
| New activities or new locations for existing activities (e.g. drilling, blasting) |
| Group policies and standards |

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As part of Anglo American’s FutureSmart Mining approach, sites will see the roll-out of new technologies, making production safer, more efficient, cleaner, and less water and energy intensive. New technologies can deliver real benefits for local communities but can also have implications for potential social and human rights impacts, employment and our supply chains. If not managed well, this could threaten our social licence to operate.

Social Licence to Innovate refers to the work Anglo American is doing to ensure we are adopting a consistent approach, sharing best practice and that operations have the support they need to ensure societal consent and cooperation to the introduction of modern mining.

Managing Social License to Innovate-related risks and potential impacts is therefore an emerging priority for Anglo American. Sites should, where appropriate:

- include managing potential Social License to Innovate-related impacts and risks as one of their long-term objectives
- incorporate Social License to Innovate as a driver in defining the operation's value proposition to stakeholders and therefore (see Section 4A)
- ensure that the potential risks and impacts of new technologies on external stakeholders are considered in planning
- incorporate Social License to Innovate as a topic for engagement with potentially affected stakeholders

**BOX 2.3 Social Licence to Innovate**

*SED*
Task 1 – Conduct screening

Task 2 – Conduct internal context review

Task 3 – Determine the Area of Influence

Task 4 – Conduct external context review

Task 5 – Assess systemic vulnerability

Social Performance teams should define (or review) the site's Area of Influence and map it, ideally using a geographic information system (GIS) platform. GIS can be useful in data interpretation, analysis, and presentation.

The Area of Influence encompasses the geographical extent of a site's potential impacts on the lives, livelihoods, health or well-being of external stakeholders and the natural environment, taking into account the following elements:

- the site's activities and facilities that are directly owned, operated or managed (including by contractors or third parties acting on the site's behalf), including power transmission corridors, pipelines, access roads, construction camps, ports, etc.
- other associated facilities, which are facilities that are funded separately by the company or a third party but whose viability and existence depend (almost) exclusively on the site and without which the site would not be viable.
- the impacts from planned and unplanned developments or activities that may occur in the future or at a different location. This could include developments led by the site (including contractors working on the site's behalf) to support ongoing operations (e.g. stay in business projects, developments etc.) as well as predictable developments that are not managed by the site e.g. expansion of a nearby town due to site-induced migration. It also includes cumulative impacts.
- the indirect impacts on biodiversity or on ecosystem services (i.e. the benefits humans gain from the natural environment and from properly functioning ecosystems), which local communities' livelihoods are dependent on; e.g. loss of fisheries owing to water contamination.
- the site's primary labour-sending areas and areas where income generated from site employment is spent; i.e. the towns and communities that are likely to experience economic benefits from the site.

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A community's proximity to the site (including pipelines, ports, access roads, etc) should not be the sole or primary criterion to determine the site's Area of Influence. Communities further away from the site may be equally or more significantly impacted than those located closer to the site. For example, an environmental incident resulting in the release of chemicals into a river could adversely affect communities located downstream, and sometimes a decrease in employment opportunities at the site may impact on communities located far away (such as labour-sending areas).

Because of this, the Area of Influence does not have to be a single, contiguous area. The Area of Influence may also extend across administrative or national boundaries.

The most effective way to define the Area of Influence is to assess the geographical extent of each of the site's potential social and human rights impacts, including cumulative impacts. Impacts are also identified, in part, through engagement with external stakeholders.

The Area of Influence evolves over time because of changes in the site's footprint, activities, and potential impacts. Lifecycle transitions and site expansions, in particular, may result in a change in the Area of Influence. The Area of Influence may also change owing to changes to the external context.
Task 4 – Conduct external context review

Contents in this section:
Task 1 – Conduct screening
Task 2 – Conduct internal context review
Task 3 – Determine the Area of Influence
Task 4 – Conduct external context review

Task 5 – Assess systemic vulnerability

Social performance management can only be effective if it responds to the constantly changing political, social, cultural and economic characteristics of the Area of Influence. Social Performance Review and Planning, therefore, includes collection and analysis of relevant baseline data.

Every five years, sites are required to review existing baseline data and comprehensively refresh/update (parts of) the data as needed so that the data remains relevant, useful, and recent (ideally, not older than five years). A more frequent refresh/update may be needed as a result of significant changes in the
or site activities, and/or in socio-economic characteristics of the Area of Influence.

A list of baseline data topics that all sites should review is included in Tools (see 2.4 Tools). Mandatory topics include legal and regulatory requirements; land and natural resource use; political and governance context; population and demographics; personal and political security; public services and infrastructure; cultural heritage; and stakeholder perceptions (see Section 3A). For screened-in topics listed in Section 4 (see 2.2 Task 1) specific and additional baseline data may be required, which is detailed in the relevant chapter in Section 4.

Box 2.4 summarises the elements that should be considered in the external context review.

<table>
<thead>
<tr>
<th><strong>EXTERNAL CONTEXT</strong></th>
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<td>Legal and regulatory requirements</td>
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<td>Political and governance context</td>
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<td>Population and demographics</td>
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<td>Cultural heritage</td>
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**BOX 2.4 Summary of external context review**

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![Diagram](image-url)
The type of baseline information required, including granularity and scope, depends on the site. A scoping exercise should be undertaken to establish the required scope, method and resources required for data collection, as well as information already available. Information collected should be relevant to the site and be able to inform the site's decisions, plans, activities, control measures, and/or track relevant trends. The type of baseline data collected, and its level of detail, also depends on the type of potential social and human rights impacts and risks in the site's Area of Influence, and therefore may change over time. Expert review of the baseline data collection method and scope is advised.

Baseline data typically consist of a combination of qualitative, quantitative, and spatial data from secondary, and where secondary data does not suffice, primary sources. Collecting baseline data can be a time-consuming and resource-intensive process. Sites should consider the required scale, detail and disaggregation of data required to allow risks and potential impacts to be adequately assessed and to compare with future monitoring in the Area of Influence.

Secondary data collection is desk-based and involves the collection of existing qualitative and quantitative data. Useful secondary data sources include: previous studies and assessments (e.g. EIA), local government information and statistics; national government information and statistics; local and international NGOs; media, UN and World Bank reports, etc.

Primary data collection must consider gender, age, ethnic, religious, etc. differences. Data collection strategies should be developed to consider data collection from different marginalised or vulnerable groups, allowing accurate information on all groups to be collected. There are several ways to collect primary data, including through:

- Household surveys, which allow for quantitative data collection at the household and/or individual level using questionnaires.
- Focus-group discussion, which allows for quantitative and/or qualitative data collection from talking to specific population groups. This may include livelihood or wealth ranking, community mapping, and/or Venn diagram development.
- Key informant interviews, which allows for quantitative and/or qualitative data collection from specific individuals around a specific topic.
anecdotal evidence can be useful for understanding stakeholder perceptions on certain topics.

Baseline data does not have to be captured in long, text-based reports. There is significant value in maintaining an electronic database or data management system so that data trends, different combinations of relevant data, and other statistics can be easily assessed.

GIS mapping should be used to represent data spatially wherever possible. Charts, graphs and infographics can also be used to interpret results and communicate findings. Any data limitations or uncertainties should be noted.

The external context review also includes a systemic vulnerability assessment (see 2.2 Task 5).

Collecting baseline data can be a time-consuming, resource-intensive and technically complex process requiring specialist skills. It usually involves some degree of outsourcing to consultants.

Where sites have identified gaps in their baseline data, they should consider commissioning consultants to carry out or support the work to collect new or additional data. Section 1 provides more detail on the use of consultants in social performance management. Where external consultants are used and primary data is collected, sites must make sure that sites own the data collected and that the data is made available in a usable format.

Any personal data must be managed in accordance with the Anglo American Group Data Protection Policy.

Data must be processed:

- Appropriately: only process data when we have a lawful reason to do so; take extra care with very sensitive data; recognise and respect the rights of the people (data subjects) whose information we hold.

- Transparently: we must tell individuals when we are collecting their data and what we are going to do with it; we can only use personal data for the purpose it was intended. If we want to use it for something else then we need to go back to the 'data subject' and tell them.

- Securely: We must protect personal data from harm, whether accidental or malicious loss, destruction, damage and unauthorised disclosure. If there is a breach then we must act quickly, and report it to dataprotection@angloamerican.com

We must not share personal data with anyone, unless this is deemed necessary. If it is, we must make sure the person or organisation we are sharing it with will give it the same protection we do. If it is with an external party a data sharing agreement may be needed.

- Responsibly: We must only collect and use the personal data we need. If it does not help to achieve our intended business objective, then it is off limits. We must make sure the personal data we process is accurate and kept up-to-date. We cannot keep hold of personal data forever. We can only store and process it for as long as it is required and then delete it.
Vulnerability is context-specific. While there are factors that are more likely to make individuals or groups vulnerable (e.g. age, gender, health, social status, sexual orientation), they are not absolute determinants. An elderly woman is not vulnerable simply by virtue of being old or female.

Vulnerability depends on a number of factors, including the applicable legal framework, societal or community customs and traditions, socio-economic or environmental conditions, and the provision of public services and infrastructure.

Identification of vulnerability is a multi-layered process. As part of social performance review and planning, every five years, sites are required to identify, first; systemic vulnerability, and, subsequently; site-related vulnerability (see Box 2.7). This should be reviewed and updated if needed on an annual basis.

SED

Vulnerability is the accepted term for the sensitivity of the society, communities, and households to positive and negative impacts and changes.

Vulnerable communities, groups, or individuals may be:

- Excluded or inhibited from meaningful participation in sites' engagement and decision-making processes.

BOX 2.7 Definition of site-related vulnerability
Less likely to be able to cope with potential adverse impacts and manage changes caused by a site.

Assessed in Section 3A – Stakeholder Engagement.

Less able to take advantage of the opportunities and benefits a site provides.

Systemic vulnerability refers to communities, sub-groups or individuals with a reduced or compromised ability to realise or maintain a sustainable livelihood.

A livelihood comprises the capabilities, assets and activities required for a means of living. A livelihood is sustainable when it can cope with or recover from stresses and shocks and maintain or enhance its capabilities and assets, both now and in the future, while not undermining the natural-resource base.

1

**Table 2.2 - Systemic vulnerability assessment**

<table>
<thead>
<tr>
<th>Systemic vulnerability rating</th>
<th>Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MAJOR</strong></td>
<td>Extreme levels of vulnerability across the community. Community is unable to manage almost any change Sub-group’s livelihood and well-being are not sustainable</td>
</tr>
<tr>
<td><strong>HIGH</strong></td>
<td>Profound multiple levels of vulnerability within a community undermining its ability to change Sub-group’s livelihood and well-being are barely sustainable</td>
</tr>
<tr>
<td><strong>MODERATE</strong></td>
<td>A few areas of vulnerability. Community retains an ability to, at least in part, adapt to changes and opportunities Sub-group’s livelihood and well-being sustainability are compromised but manageable</td>
</tr>
<tr>
<td><strong>MINOR</strong></td>
<td>Minimal areas of vulnerability and, consequently, the community has a high ability to adapt to change Sub-group’s livelihood and well-being are sustainable and not compromised</td>
</tr>
<tr>
<td><strong>INSIGNIFICANT</strong></td>
<td>Minimal vulnerability. The community or sub-group has a very high ability to adapt to changes and maximise opportunities</td>
</tr>
</tbody>
</table>

**Box 2.9 - Systemic vulnerability rating**

Systemic vulnerability should be rated at the community level and for the identified sub-groups. Rating categories for systemic vulnerability are defined in Box 2.9 below. Their definitions are context-specific and based on regional and national norms.
### Definition/Aspects of Capital

Capital needed to realise or maintain a sustainable livelihood.

Factors that may contribute to a reduced or compromised ability include:

**Natural Capital**
- forest products, land, clean air and water, biodiversity
- fisheries, minerals

**Physical Capital**
- goods and equipment, facilities and household infrastructure (education, health and nutritional level of education and health, knowledge and skills, technological capabilities)
- productive assets (farmland, forest land, water bodies)

**Human Capital**
- access to health care, education, social services, information, skills, training, leadership, decision-making, involvement in community systems
- ability to participate in political, economic and social systems, ability to provide leadership, strong decision-making

**Economic Capital**
- savings or other financial investments, income, adequate livelihoods, sustainable livelihoods, low levels of poverty, low levels of vulnerability

Factors that may contribute to a reduced or compromised ability include:

**Natural Capital**
- deforestation; construction on arable land; land degradation; loss of biodiversity; high air/water pollution; reliance on degraded water bodies; high rates of water depletion

**Physical Capital**
- limited availability of public services and/or infrastructure; limited accessibility of public services and/or infrastructure; limited affordability of goods and equipment
- transportation and household goods and equipment

**Human Capital**
- discrimination (gender, race, religion, social status); connectivity and access to communication and information; traditional customs; poverty; limited education; levels of education including primary education; school enrolment; quality of education; poor sanitation and hygiene; disability and mental health; traditional customs; presence of social ills; structured social networks; social cohesion; and absence of support networks

**Economic Capital**
- asset ownership; repressive or weak provision of security; inequitable access to savings or other financial investments; low productivity of livelihoods; limited access to savings; unemployment; limited access to alternative employment; high levels of poverty; low levels of productivity of livelihoods; low levels of income

### Description and List of Aspects of Capital in Community A

At community level:
- particularly high 'reduced ability' Factors in Community A with groups of the population
- possible

At sub-group level:
- possible

Supported by statistics where possible.
### Capital

**Definition/Aspects of Capital needed to realise or maintain a sustainable livelihood**

**Factors that may contribute to a reduced or compromised ability to realise or maintain a sustainable livelihood**

**Community A**

At sub-group level:
- Describe and list sub-groups of the population in Community A with particularly high 'reduced ability' Factors, supported by statistics where possible.

**Community n**

At sub-group level:
- Describe and list sub-groups of the population in Community n with particularly high 'reduced ability' Factors, supported by statistics where possible.

### Systemic vulnerability rating

**At community level:**
- Insert the overall systemic vulnerability rating for the community, based on an average of the levels of Capital, using the systemic vulnerability rating definitions.

**At sub-group level:**
- List and insert the overall systemic vulnerability rating for sub-groups in the community that have a higher systemic vulnerability rating than the community as a whole, based on an amalgamation of the levels of Capital, using the systemic vulnerability rating definitions.

---

**References:**


(Accessed: December 2019)
As part of Social Performance Review and Planning, sites are required to identify and review long-term social performance objectives (i.e. typically >10-year objectives) every five years. The purpose of the long-term social performance objectives is to define the approach to secure and maintain a social licence to operate and achieve the business objectives over the long term. The long-term social performance objectives therefore must be based on the LoA, looking ahead at the full LoAP, and should be supported by interim milestones needed to achieve the long-term objectives.

The long-term social performance objectives should draw on:

- Examples of long-term social performance objectives and interim milestones are provided in Table 2.5 in the CHECK section.
- The long-term objectives should be developed through external consultations and internal discussions. The internal Business objectives and plans contained within the LoAP
- The external context review Sustainable Mining Plan goals
- Priorities and issues raised by external stakeholders, including strengthening accountability
- Commitments made to external stakeholders Social Licence to Innovate

2. REVIEW AND PLANNING

- Task 6 – Set long-term social performance objectives
- Contents in this section:
- Task 6 – Set long-term social performance objectives
- Task 7 – Update the Social Management Plan
- Task 8 – Develop Stakeholder Accountability Report (SAR)
The process of setting long-term objectives provides an opportunity to strengthen accountability and reinforce relationships with potentially affected stakeholders. Social Performance teams should engage external stakeholders in defining a site’s long-term social performance objectives. At minimum, sites should consult through the Community Engagement Forum (CEF). Discussions should aim to establish a common understanding of potential significant social and human rights impacts and risks as a basis for defining the objectives. It is good practice for members to take accountability for contributing to the delivery of long-term social performance objectives where appropriate. Creating a shared, or co-owned, vision for the site can further strengthen the sense of partnership and common endeavour.
The primary output of Social Performance Review and Planning is a comprehensive Social Management Plan (SMP). The SMP is the go-to document for a clear overview of the site’s social performance context, issues, and objectives. Anyone who has read the SMP should have a clear understanding of the site’s social performance priorities, plans and management approach.

The SMP defines and drives progress towards the site’s long-term social performance objectives. The SMP is subject to a substantial refresh every five years as a result of a review/update of the baseline and context analysis, or more frequently owing to significant changes in the social context, or in the internal or external context.

The SMP also includes an annual implementation plan, which should be updated every year as it reflects the priorities and activities for the forthcoming year.

The SMP does not have to duplicate detailed information that is already captured in other documents (such as a detailed overview of stakeholder engagement activities, which is captured in the Stakeholder Engagement Plan), but it should provide a high-level summary or highlight key points as indicated in Table 2.3 and make reference to the other documents.

The process of developing the SMP should be cross-functional. In part, this happens through internal discussions around several of the component elements, notably Stakeholder Engagement (see Section 3A) and (see Section 3C) but the process should also include the (see Section 1). A draft of the SMP should be presented and discussed at the and the final version agreed by the .

The SMP should include the sections listed in Table 2.3. Guidance on the monitoring and evaluation component is provided in CHECK and in Section 1.

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<tr>
<th>Table 2.3 - Sections</th>
<th>Content</th>
<th>Frequency of update and review</th>
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2. REVIEW AND PLANNING

Do

Task 7 – Update the Social Management Plan

Contents in this section:

Task 6 – Set long-term social performance objectives

Task 7 – Update the Social Management Plan

Task 8 – Develop Stakeholder Accountability Report (SAR)
An overview of internal and external reporting requirements; i.e. what should be reported to whom and when.

Frequency of update and review

Purpose and objectives

Summary of the purpose and key objectives of the Plan. As relevant

Regulations

and other requirements and other

objectives

Summary overview of relevant laws, corporate standards and international standards that affect social performance

activities.

Summary analysis of operational plans and activities and how they affect social performance management

priorities and desired outcomes is captured in the Social Performance Management Plan, which should be referenced in the Sustainable Mining Plan. The objective of the Sustainable Mining Plan is not to duplicate all the information from the Baseline WRAC, as well as in in-depth plans (as required in

Risk and Opportunities Management). The objective of this section of the Sustainable Mining Plan is to identify and summarise the long-term goals, priorities, and

outcomes and priorities. This should include a summary of specific management plans, both of which should be referenced in the

priorities and desired outcomes is captured in the Sustainable Mining Plan, which should be referenced in the

Signed off by the General Manager.

Review

Reporting

references

requirements

and other

Regulations

objectives

Purpose and objectives

Summary of the purpose and key objectives of the Plan. As relevant

Regulations

and other requirements and other

objectives

Summary overview of relevant laws, corporate standards and international standards that affect social performance

activities.

Summary analysis of operational plans and activities and how they affect social performance management

priorities and desired outcomes is captured in the Social Performance Management Plan, which should be referenced in the Sustainable Mining Plan. The objective of the Sustainable Mining Plan is not to duplicate all the information from the Baseline WRAC, as well as in in-depth plans (as required in

Risk and Opportunities Management). The objective of this section of the Sustainable Mining Plan is to identify and summarise the long-term goals, priorities, and

outcomes and priorities. This should include a summary of specific management plans, both of which should be referenced in the

Signed off by the General Manager.

Review

Reporting

references

requirements

and other

Regulations
<table>
<thead>
<tr>
<th>Section</th>
<th>Content</th>
<th>Frequency of update and review</th>
<th>Commitments</th>
</tr>
</thead>
</table>
| SHIRA  | Describe previous year's social and human rights impact and risk management activities, including main achievements, challenges, etc. Summarise activities for the forthcoming year, incorporating any lessons learned from the previous year. A detailed summary of staff requirements, including additional specialist in-house expertise, consultancy time, budgets and monitoring and evaluation indicators and interim milestones, including significant obstacles in trying to achieve them.
|  | Provide a summary of the previous year's grievances and incidents in terms of number, type, close-out times, the most significant incidents and grievances by community, etc., and describe how this is used to inform and/or amend the grievance process and risk- and impact-control measures. Summarise activities for the forthcoming year, incorporating any lessons learned from the previous year. A detailed summary of planned and required training and capacity development. Include a summary of the previous year's social and human rights impact and risk management activities, including main achievements, challenges, etc.
|  | Summarise activities for the forthcoming year, incorporating any lessons learned from the previous year. A detailed summary of planned and required training and capacity development. Include a summary of the previous year's social and human rights impact and risk management activities, including main achievements, challenges, etc.
|  | Include a summary of planned and required training and capacity development. Include a summary of the previous year's social and human rights impact and risk management activities, including main achievements, challenges, etc.
|  | A summary of the most important social commitments, including commitments that have been fulfilled in the preceding year, commitments overdue, a description of progress towards meeting major commitments and an analysis of any delays, challenges or constraints.
|  | Include a summary of the most important social commitments, including commitments that have been fulfilled in the preceding year, commitments overdue, a description of progress towards meeting major commitments and an analysis of any delays, challenges or constraints.
|  | A summary of the most important social commitments, including commitments that have been fulfilled in the preceding year, commitments overdue, a description of progress towards meeting major commitments and an analysis of any delays, challenges or constraints.
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|  | A summary of the most important social commitments, including commitments that have been fulfilled in the preceding year, commitments overdue, a description of progress towards meeting major commitments and an analysis of any delays, challenges or constraints.
External stakeholder trust in a site depends heavily on the fulfilment of promises made. Sites are therefore required to have a commitments procedure, which stipulates what type of commitments can be made to external stakeholders by whom, the approvals process for making commitments, and the requirement to register all commitments made.

Sites must compile and maintain a Commitments Register (CR) to register and track progress against commitments made. The CR is a critical tool in promoting accountability. It is a living document and sits as an Annex to the or in an online register. The CR should have clear accountabilities, timelines, and budgets (where relevant) allocated to each commitment. Sites may maintain parallel functional commitments registers where different managers monitor commitments; they should, however, be aligned and reported in aggregation.

The CR should reflect all commitments made to external stakeholders, including on elements related to social performance, environmental performance, health and safety etc:

- Regulatory commitments
- Permitting commitments
- Commitments made in community agreements, such as Social and Labour Plans and Impact and Benefit Agreements
- Verbal or written commitments made to stakeholders
- Commitments related to impact management, including resettlement-related commitments where relevant.
- Commitments related to operational activities such as a commitment to avoid blasting or dumping at certain times in certain areas

Progress against commitments should be tracked and analysed on a monthly basis and reported to site management on at least a quarterly basis, using suitable monitoring metrics, such as:

- The number and type of existing and new commitments made

BOX 2.11 - Commitments Management
The number and percentage of commitments closed out on time and within budget
Progress against outstanding commitments in percentage completed
The number and type of commitments nearing the completion date
The number, percentage, and type of commitments overdue and over budget
The risk of not delivering on the commitment. This can be used to prioritise commitments
A review of whether the site is making commitments as per its commitments procedure, where deviations from the procedure occur, and why
A review of whether commitments are made strategically; i.e. to key stakeholders, contributing to risk and/or impact management, contributing to the long-term social performance objectives, etc.
A review of what type of commitments go over schedule and budget and why.

A summary of relevant commitments and progress status against commitments should be monitored and discussed regularly through the CEF or other relevant engagement mechanism and be included in the SAR.
Anglo American's commitment to accountability is realised, in part, through transparent reporting and communication with potentially affected stakeholders about social performance review and planning and management. External stakeholders, including the CFF, should be consulted to inform a site's long-term social performance objectives and priorities, assess potential social and human rights impact and risks, and identify suitable controls for risk and impact management (see Section 3A). This information is then included in the Stakeholder Accountability Report (SAR).

Every five years, upon completion of the review/update of the external and internal context, long-term social performance objectives and priorities, and updating of the Social Management Plan, sites are required to develop and disclose a Stakeholder Accountability Report (SAR). The SAR provides an opportunity to provide an overview and feedback on the steps taken and progress made by the site in terms of social performance management and to highlight long-term social performance objectives and priorities. The SAR should be transparent and candid but is subject to legal and commercial confidentiality and general sensitivity considerations.

The SAR provides the basis for the Social Management Plan, and relevant sections of the SMP should be summarised and compiled into a narrative report for external stakeholders (see Table 2.4). The draft SAR should be reviewed and discussed by the SPMC and the Business Unit (BU), because it contains information and public commitments to stakeholders, which should be properly understood by key internal stakeholders.

<table>
<thead>
<tr>
<th>TABLE 2.4</th>
<th>Review of external and internal context</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder mapping</td>
<td>Describe the site's Area of Influence, including an overview of potentially affected stakeholders, bearing in mind sensitivities around disclosing certain information.</td>
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### Social Management Plan

#### Stakeholder Accountability Report

Potential social and human rights impacts and risks

Summarise the key potential social and human rights impacts and risks, and the key prevention and mitigation measures. These do not have to be explicitly termed as 'human rights impacts' (see Section 3C).

**Socio-Economic Development (SED) priorities**

Describe priorities and desired outcomes. List main projects.

**Commitments**

Describe key social commitments, commitments fulfilled in preceding reporting period and progress towards meeting major commitments still open, including any delays, challenges or constraints.

**Long-term objectives**

Include long-term objectives. This section should also include an overview of progress towards and/or effectiveness in meeting existing objectives. Include milestones as appropriate.

The final report should be presented to and discussed with key external stakeholders. At a minimum, this should be through the CFF and with potentially affected stakeholders. Sites should also consider targeting a wider audience, which could include regulators, local governments, development partners, etc. Sites should use the to discuss progress against long-term objectives, commitments, and social and human rights impact management with external stakeholders on a regular basis. Stakeholder engagement activities related to the should be included in the report.

The final report should be publicly available, at a minimum, through publication of the full report on the Anglo American website in a language understood by affected stakeholders. Additional methods may be required to ensure that affected stakeholders can access and understand the report; for example, by making hard copies available, or by disseminating certain content via local radio or newspapers.
Task 9 – Monitor and evaluate

Monitoring and evaluation of social performance review and planning is designed to track progress against the long-term objectives and interim milestones by assessing the progress and effectiveness of actions and programmes designed to reach the long-term objectives. Table 2.5 provides an example.

The results of monitoring and evaluation should help determine whether adjustments to those actions or programmes need to be made to achieve the long-term social performance objectives. More information on monitoring and evaluation is provided in the Governance section (see Section 1). Guidance on monitoring and evaluation of social and human rights impacts and risk management is provided in the section (see Section 3C).

### TABLE 2.5 – Monitoring and Evaluation Framework for long-term social performance objectives

<table>
<thead>
<tr>
<th>Long-Term Social Performance objective</th>
<th>Long-term target</th>
<th>Interim milestones</th>
<th>Annual objective</th>
<th>Annual activities</th>
<th>Annual inputs</th>
<th>Annual outputs</th>
<th>Annual outcomes</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example 1</td>
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<tr>
<td>Background to internal and external context:</td>
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<td>Site has been in care and maintenance for the last two years, during which most of the workforce was let go and the majority of local procurement contracts terminated and there was a reduction in activities. Stakeholder trust was lost in this process and stakeholders have expressed uncertainty about the site's long-term commitment to the area, making it difficult to build partnerships. The community is divided: there are several different interest groups purporting to represent their community and low levels of confidence in local authorities.</td>
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<td>In 2030: high levels of trust and confidence in the site amongst a broad cross-section of</td>
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<td>In 2030, 90% of community survey respondents report high levels of trust in the site</td>
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<td>In 2022: all members regularly participate in meetings</td>
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<td>In 2020: officially established, with clear mandate, structure, and confirmed</td>
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<td>Consultations with potentially affected communities about membership, structure, and</td>
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<td>Staff time on consultations</td>
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<td>$ spend on venue and logistics for</td>
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<td>Number of consultations held</td>
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<td>Number of community members aware of plan to establish and its mandate</td>
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<td>Official launch meeting held</td>
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2. REVIEW AND PLANNING
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In 2023: all stakeholders are incorporated into project design.

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Example 2

In 2020: All commitments are understood by stakeholders.

Potential social impacts of underground mining are understood by community members.

In 2020: High levels of trust in the site.

Site currently operates one open pit and will be opening a new underground mine in the next 10 years.

The local population has not had exposure to underground mining and therefore has limited understanding of potential adverse and positive impacts.

In 2023: All stakeholders are aware of plan.

In 2025, 65% of respondents report high satisfaction with the site.

In 2027: A sharp decrease in complaints about accessibility is visible in the site.

In 2028: A sharp decrease in complaints about accessibility is visible in the site.

In 2030: 0 protests against the site by potentially affected stakeholders.

In 2027: A sharp increase in participation of community members in consultations.

In 2028: A sharp increase in participation of community members in consultations.

In 2029: A sharp decrease in protests against the site by potentially affected stakeholders.

In 2030: 90% of respondents register with the grievance procedure.

Grievance procedure is more accessible for complainants.

New grievance register is held at the site.

Increase in accessibility are understood by community members.

Decrease in accessibility are understood by community members.

Consultations process is more accessible for community participants.

Revised grievance procedure is more accessible.

New grievance register is documented.

Increase in accessibility are understood by community members.

Decrease in accessibility are understood by community members.

First grievance is received, indicating that the grievance procedure is more accessible.

Revised grievance procedure is more accessible.

Increase in accessibility are understood by community members.

Decrease in accessibility are understood by community members.

New grievance register is held at the site.

Increase in accessibility are understood by community members.

Decrease in accessibility are understood by community members.

First grievance is received, indicating that the grievance procedure is more accessible.
In 2025: all members demonstrate good understanding of potential impacts, risks and opportunities on priorities for health programme interventions.

Conduct participatory monitoring of underground working and associated requirements for medical fitness to work.

In 2030: average 75% of the site's workforce are medically fit to work as assessed by a specialist. The site's ability to operate responsibly, safely and continuously shows an increased level of confidence in the local labour force, reflected in a high level of applicants.

In 2028: 90% of the site's underground mine workforce understand their role in the transition to underground mining and are associated with opportunities and activities to support the local community.

In 2023: 80% of key health factors affecting health behaviours and consumption are demonstrated by respondents in the first round of the health baseline survey.

In 2020: a specialist project team is established, including key stakeholders, to produce an updated report findings to share with stakeholders and third-party opinion leaders.

Undertake consultations with key stakeholders and other key project stakeholders.

Design and produce delivery materials for consultation and communication.

$ Spend on logistics for deliverables review and consultant fees.

Management staff time for consultations.

Number of meetings held to share results of the project and agree to transition to underground mining under terms of a SEP.

Number of grievances relating to underground mining perceptions in the health baseline survey for people received.

Number of enquiries or grievances relating to underground mining concerns about health programme outcomes.

Increase in number of complaints.

Agreement on key health baseline survey amongst key stakeholders.

Results of the health baseline survey are completed, and Endorsement of the results disclosed.

Number of people distributed materials for communication.

$ Spend on communication materials for consultations.

Number of copies of the updated report findings distributed to key stakeholders.

Number of key stakeholders targeted by the project.

Number of people invited to meetings.

Number of people who participate.

$ Spend on consulting with key stakeholders.

Number of reports prepared.

Number of reports shared with stakeholders.

Third-party consultant fees.

Consultations with key stakeholders.

Number of people consulted.

Specialist project management staff time for consulting.

Number of meetings held.

Number of reports prepared.

Number of reports shared.

Third-party consultant fees.

Consultations with key stakeholders.

Number of people consulted.

Specialist project management staff time for consulting.

Number of meetings held.

Number of reports prepared.

Number of reports shared.
Participatory monitoring is not a requirement in relation to social performance review and planning. However, participatory monitoring in respect of a site’s long-term social performance objectives, priorities, and milestones is good practice and recommended particularly where there is, or has been, a confrontational or distrustful relationship between the site and local communities. More information on participatory monitoring is provided in the Governance section (see Section 1).
The final part of the Plan Do Check Act (PDCA) process consists of adjusting the approach to achieving long-term objectives and the annual implementation plan as needed, based on monitoring and evaluation results.

Where monitoring and evaluation shows that the approach to reaching the long-term social performance objectives is not effective, the approach should be adjusted as appropriate.

Internal capacity and resourcing issues, changes to the internal and/or external context, issues raised in stakeholder engagement activities, grievances and incidents, and monitoring and evaluation results of risk and impact mitigation (see Section 3C) may prompt an adjustment in annual activities and/or long-term objectives, which should be captured in the .SMP.
Results of monitoring and evaluating and any adjustments made to the should be reported to internal and external stakeholders through the SMP and SPMC or equivalent structures, as appropriate.

2. REVIEW AND PLANNING

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Table 2.6 lays out the typical roles and responsibilities for social performance review and planning.

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>ROLE</th>
<th>RESPONSIBILITIES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Group Social Performance and Engagement Principal</td>
<td>Advises on development of and Must be consulted on the for the baseline assessment and decisions around outsourcing and selection of external consultants</td>
</tr>
<tr>
<td></td>
<td>Head of Corporate Affairs</td>
<td>Advises on legal and regulatory compliance Must be consulted on the for the baseline assessment</td>
</tr>
<tr>
<td>LIFE OF ASSET PLANNING</td>
<td>Life of Asset (LoA) planning team</td>
<td>Provides information on and Reviews Design Criteria Pro forma Revises as necessary</td>
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<tr>
<td></td>
<td>Social Performance Manager</td>
<td>Conducts external and internal context review. Engages with team to develop the Reviews and updates internal and external context Conducts vulnerability assessment Drafts and Lines of accountability</td>
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COMPANY LEVEL
ROLE
RESPONSIBILITIES

Determines Area of Influence
Updates the ...
as needed
Conducts ...
on long-term ...
objectives

HEADS OF DEPARTMENTS AND ...

Security
Human Resources
S&SD
Supply Chain
Operations
Finance

Involved in developing the ...
and ...
including ...
framework as relevant to ...

SITE MANAGEMENT

General Manager

Signs off on the ...

Accountable for the delivery of ...
Ensures integration of the social performance review and planning into the ...
Approves budget and allocation of human resources
The table below is a tool that sites should use to determine which of the topics covered in Section 4 should be screened in.

The table explains the factors that make some of the Section 4 topics mandatory (i.e. always screened in). These are:

- Socio-Economic Development (4A)
- Contractor Social Management (4B)
- Community Health and Safety (4C)
- Emergency Preparedness and Response Planning (4D)
- Security Management and the Voluntary Principles on Security and Human Rights (4E)

For the 'non-mandatory' topics, the trigger factors presented should be considered by sites to determine which topics should be screened in. These are:

- Land Access, Displacement and Resettlement (4F)
- Site-Induced Migration (4G)
- Cultural Heritage (4H)
- Indigenous Peoples (4I)
- Conflict Management (4J)
- Artisanal and Small-Scale Mining (4K)

The purpose of screening is for sites to determine whether there are or there could be potential impacts on external stakeholders and/or risks to the business associated with these topics. The purpose of screening is not to describe what such impacts or risks might be, assess their significance, define controls or monitoring and evaluation requirements. That is done through the Social and Human Rights Impact and Risk Analysis (SHIRA) process using the guidance provided on each topic in Section 4.

Note that even though a topic is screened in, the risks and/or impacts related to the topic may not be significant. At the same time, the baseline WRAC should not include impacts and/or risks related to a topic that is not screened in, even if these are rated low.

Sites should fill out the relevant sections of the table below and indicate, for each topic, whether it is screened in or out, and provide their reason for the screening decision. Where there is doubt, it is recommended that sites take a cautious approach and screen a topic in until they can determine through the context review and process (using the relevant Section 4 guidance) that impacts related to the topic in question are negligible.

The approach to managing impacts and risks for screened-in topics is commensurate to risk. Standalone management...
Trigger factors for screening a topic in. Not all trigger factors have to be present for a topic to be screened in.

**Source of information**

Potential sources of information to identify trigger factors.

**Screening decision**

Indicate whether the topic is screened in or out and explain why based on the presence/absence of trigger factors.

There are site activities and/or worker accommodation arrangements that could increase exposure of community members to the workforce, including contractors. This could lead to increased pressure on local housing leading to overcrowding and potential spread of respiratory disease (TB, Covid-19), sexually transmitted infections due to inappropriate interactions or fraternization of workforce with the community, increase in social ills such as alcoholism, commercial sex work with the potential for spread of disease and violence/crime, and altered social dynamics in the community.

Site-induced in-migration exists (with the possibility of leading to community health and safety impacts)

Resettlement and/or displacement exists (with the possibility of leading to community health and safety impacts)

There is a complex socio-economic context including high levels of systemic vulnerability relating to: poverty, food insecurity, areas prone to natural disasters, weak governance, conflict, refugees or internally displaced people, marginalised indigenous people or ethnic groups and human rights concerns

The health system in the sites Area of Influence is weak, or poorly capacitated to anticipate, plan and/or respond to potential changes in public health requirements, increased demands or a shifting focus related to changing priorities induced by the site's presence/activities.

There are areas within the site's Area of Influence that are prone to communicable disease outbreaks or epidemics.

**Emergency Preparedness and Response Planning**

There are site activities (including at associated and ancillary facilities such as transmission lines, rail lines, roads, and ports) that could result in an emergency that can impact on local communities. Such activities may include but are not limited to:

- Off-site, public road transport accidents
- Mineral Residue Facility, including Tailings Dam and Water Storage facility failure
- Waste rock dump failure
- Pipeline failure
- Spill of hazardous materials being transported to/from site (via road, rail, sea, air)
- Spill of hazardous materials on site (including at associated facilities)
- Ground subsidence
- Fire (starting on site)
- Accidental atmospheric releases
- Explosions
- Blasting accidents

Life of Asset Plan: information about existing or planned site activities that could result in an emergency impacting on local communities

Baseline WRAC of previous years: this may already include site-induced emergencies that may impact on communities

SHIRA

Incident and grievance records: to identify whether grievances were raised, or incidents occurred in relation to emergencies that could impact on communities

Stakeholder engagement records: to identify whether concerns or issues were raised in relation to potential emergencies that could impact on communities

Emergency Preparedness and Response Plans of previous years: this may already include examples of potential emergencies that could impact on local communities
Indicate whether the topic is screened in or out and explain why based on the presence/absence of trigger factors.
Trigger factors for screening a topic in. Not all trigger factors have to be present for a topic to be screened in.

Potential sources of information to identify trigger factors.

Indicate whether the topic is screened in or out and explain why based on the presence/absence of trigger factors.

External characteristics likely to contribute to site-induced migration, such as:

- **4H Cultural Heritage**
  - Tangible or intangible cultural heritage exists or is likely to exist within the site's Area of Influence, including historical, archaeological, paleontological resources, natural resources with cultural significance, or established cultural practices, norms and customs.

  - Independent of whether cultural heritage is screened in or out, all sites are required to have a Chance Find Procedure. Guidance on the content of the Chance Find Procedure can be found in Section 4H on Cultural Heritage.

- **4I Indigenous Peoples**
  - Presence of indigenous people or indigenous people's land within the site's Area of Influence

  - Where it is not clear whether a local community is indigenous, where there are conflicting opinions about whether a local community is indigenous, or whether indigenous peoples' lands (whether officially recognised or not) are located within the site's Area of Influence, sites should use the guidance provided in Section 4I Task 1 to determine whether the local community is Indigenous and take a precautionary approach.

- **4J Conflict**
  - There is severe and ongoing disagreement between the site and external changes that lead to significantly reduced workforce numbers, which may cause out-migration

  - Exploration or closure activities attracting significant influx of Artisanal and Small scale Miners

  - Changes that lead to significantly reduced workforce numbers, which may cause out-migration

  - Incident and grievance records: to identify whether grievances related to site-induced migration were raised and/or whether incidents related to site-induced migration occurred

  - Stakeholder engagement records: to identify whether issues or concerns relating to site-induced migration were raised

  - Lack of capacity and/or supply of local labour, creating a need to recruit from outside the Area of Influence and bring people into the local area

  - High unemployment in the Area of Influence and neighbouring regions

  - Presence of other mine/industrial projects within or near site's Area of Influence

  - History of ASM in the Area of Influence or region

  - Lack of economic diversification in the Area of Influence (increases likelihood of out-migration at closure)

Life of Asset Plan: understanding of any site expansion activities into areas with known/potential tangible or intangible cultural heritage

External context review: information about tangible or intangible cultural heritage sites in the site's Area of Influence /Baseline WRAC of previous years: this may already include an identification of impacts and risks related to cultural heritage

SHIRA Incident and grievance reports: to identify whether grievances were raised in relation to cultural heritage and/or incidents occurred in relation to cultural heritage

Stakeholder engagement reports: to identify whether issues or concerns relating to cultural heritage were raised

External context review: information about the location of indigenous communities and their land, identified through review of relevant literature, including legal/court decisions, and government, NGO, and UN reports, and engagements with key stakeholders

Life of Asset Plan: understanding of planned site activities that could extend into indigenous peoples' land

Life of Asset Plan: site activities
Trigger factors for screening a topic in. Not all trigger factors have to be present for a topic to be screened in.

Potential sources of information to identify trigger factors.

Indicate whether the topic is screened in or out and explain why based on the presence/absence of trigger factors.

Management stakeholders and/or between external stakeholders, where the issues causing or exacerbating the conflict relate to site activities and/or site presence, and:

OR

There are indications that there is potential for such disagreement to manifest e.g. significant increase in grievances, repeat protests, withdrawal from consultation platforms by certain stakeholders or groups.

Current or recent (1-5 years) presence of artisanal/small-scale mining within the site's Area of Influence (in any status or form, legal/illegal, formal/informal)

Conditions exist in the internal and external context that are likely to attract artisanal/small scale miners.
### Guide for External Context Review

The list of data/prompts in the table below is not exhaustive and should be revised for the specific context and focused around the potentially significant impacts. Data should be collected to develop an understanding of regional and national averages, as well as local conditions, allowing for comparisons to be made.

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
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<tbody>
<tr>
<td>Historical</td>
<td>Provide a brief description of the area and recent history, including any legacy issues attributed to the site or the mining industry more widely</td>
</tr>
<tr>
<td>Legal and Regulatory</td>
<td>Provide a brief description of any legacy human rights issues reported in the Area of Influence.</td>
</tr>
<tr>
<td>Land and Natural-Resource Use</td>
<td>Is there a history of conflict e.g. critical events, mediation efforts, external interventions?</td>
</tr>
<tr>
<td>Political and Governance</td>
<td>List any laws or regulations relevant to social performance and SED.</td>
</tr>
<tr>
<td></td>
<td>Have there been any changes to legal or permit requirements of relevance to social performance?</td>
</tr>
<tr>
<td></td>
<td>Describe the institutional framework for human rights protection e.g. status of ratification and implementation of international human rights law at the national level; level of implementation of national laws and regulations resulting in human rights enjoyment in practice; any laws applicable to companies that enable or constrain respect for human rights; effectiveness of judicial remedies; human rights bodies; access to dispute-resolution mechanisms.</td>
</tr>
<tr>
<td>Land and Natural-Resource Use</td>
<td>Land prices/ownership/tenure/use/occupation, including location of communities and households in the Area of Influence and near the site</td>
</tr>
<tr>
<td></td>
<td>Describe land use in the area of influence, traditional/formal ownership/tenure/occupancy processes</td>
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<tr>
<td></td>
<td>Are there any land disputes or speculation?</td>
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<tr>
<td></td>
<td>What are land prices and have there been any major changes in the past five years? What is driving this?</td>
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</table>
| Natural-resource use including pasture, fishing, water, forest, minerals/subsoil etc. | Natural-resource availability and quality and implications for people:  
  - Air – existing air quality  
  - Water – quantity and quality of surface and ground water  
  - Noise – existing noise levels  
  - Land – soil characteristics, land use and landscape  
  - Ecosystem services (B. Much of the ecosystem services data should be held by the team as part of the Biodiversity Standard baseline data requirement)  
  - What natural resources do local communities currently rely on and to what extent (i.e. what are the alternatives)? Differentiate across different groups within the local area  
  - Are there seasonal patterns of resource use? |
<p>|                                            | Is resource access equal across communities?                                |
|                                            | Who has control (decision-making power) over the most important resources? How does this impact others? |
|                                            | Is there competition for control and/or use of natural resources?         |
|                                            | Has the availability or quality of these resources increased or decreased over time? If yes, how and why, and who has been most affected? |
|                                            | Climate, seasonality, and effects of climate change and whether the area is prone to natural disasters. |
|                                            | Describe administrative areas and structures                              |
|                                            | Describe formal and informal governance structures and processes          |
|                                            | Describe community decision-making processes                               |</p>
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<tr>
<th>POPULATION AND DEMOGRAPHICS</th>
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<tr>
<td>Are governance structures perceived to be democratic, representative and legitimate? What forms of local governance are most accepted and recognised within the local area?</td>
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<tr>
<td>What are the objectives of the area as defined by local government?</td>
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<tr>
<td>Describe key political actors (in and outside government), their area of influence, and their main priorities, interests and concerns</td>
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<tr>
<td>Describe government development-planning processes and priorities</td>
</tr>
<tr>
<td>Describe local conflict-resolution mechanisms (formal/informal)</td>
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<tr>
<td>Is the local media balanced and accommodating of different views? How much influence does the media have in opinion-making?</td>
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<tr>
<td>Describe (barriers to) access to justice</td>
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<tr>
<td>What are the emergent political issues e.g. elections, reform processes, decentralisation, mistrust between certain groups, leadership contestation?</td>
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<tr>
<th>PERSONAL AND POLITICAL SECURITY</th>
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<tr>
<td>Describe the population characteristics and trends, including population size, growth rates, death rates, birth rates, gender composition, population density</td>
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<tr>
<td>Are there indications that Indigenous Peoples are present on or near the site's Area of Influence?</td>
</tr>
<tr>
<td>What are the main ethnic/racial groups in the area? What are the main languages and religions in the local area? How does this compare to the country as a whole?</td>
</tr>
<tr>
<td>What are the main aspects of cultural identity to local stakeholders? (e.g. shared belief system, common language, kinship, livelihoods, recreation, diet, household patterns)</td>
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<tr>
<td>Describe traditional public and private gender roles and responsibilities</td>
</tr>
<tr>
<td>Describe inter-community relations – are there any existing or historical tensions or conflict between different groups? Are there strong community networks? What are the levels of trust between different groups? Are there emerging social issues?</td>
</tr>
<tr>
<td>Is there a large migrant population, and how has this group integrated into the wider community?</td>
</tr>
<tr>
<td>What are the key contextual human rights issues and risks at a national and local level? (Based on published reports or identified by external experts)</td>
</tr>
<tr>
<td>Describe any barriers to political representation or participation in decision-making.</td>
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<tr>
<td>Is there discrimination based on religion, ethnicity, gender, race, cultural practices or beliefs?</td>
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<tr>
<td>Describe any corruption (perceived or actual) within the local area and how is it perceived</td>
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<tr>
<td>List crime rates, types of crime, causes of crime, perceptions related to security and crime</td>
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<tr>
<td>Are any groups within the area particularly vulnerable to violence or other crimes?</td>
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<td>Describe labour and working conditions</td>
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<tr>
<td>What is the history of labour relations in the local area?</td>
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<tr>
<td>Is there evidence of any labour rights abuses in the local area (e.g., child labour, forced labour, etc)? Is the trafficking of people for labour or prostitution an issue?</td>
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<tr>
<td>What are the characteristics of public security provision, and how are these security services viewed by the general population and local authorities?</td>
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<tr>
<th>PUBLIC SERVICES AND INFRASTRUCTURE</th>
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<tr>
<td>Describe access to, barriers to, and quality of social infrastructure and services, including water, sanitation, power, heating, cooking fuel, transport, roads, communication, waste treatment, recreation, law enforcement, justice, emergency services (differentiate according to demographic factors or community as relevant)</td>
</tr>
<tr>
<td>Who is currently responsible for delivering these services?</td>
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<td>What are the primary infrastructure needs in the community?</td>
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<tr>
<td>What are the main housing types in the local area and their quality (e.g. formal dwellings of sound construction, traditional types of home, informal/illegal dwellings)? Where appropriate, differentiate access to housing and housing types across different groups within the local area</td>
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<tr>
<td>Is there adequate housing supply?</td>
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<tr>
<td>Describe any new infrastructure in development or planned within the Area of Influence and the actors involved</td>
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<tr>
<td>Category</td>
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<tr>
<td>CULTURAL</td>
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</table>
What are the main sources of household income?

What is the average cost of living and has it changed in the past five to 10 years? How does it compare to regional or national trends?

What is the average cost of manual labour and has it changed in the past five to 10 years? How does it compare to regional or national trends?

Describe any public social security systems or customary support systems.

What types of savings, banking and credit facilities are available to individuals and businesses?

Health status – Key health indicators and mortality and morbidity data

Epidemiological profile (prevalence of diseases, including vector-borne, non-communicable and communicable diseases) maternal health, mental health, nutrition, road accident and other accidents and emergencies prevalence rates

Factors affecting health – health-related behaviour, poverty, livelihood and working conditions, food security, nutrition, environment, crime rates and patterns, domestic violence, substance abuse, sex work, lifestyle indicators

Health services and infrastructure – Health infrastructure and healthcare system. Clinics, hospitals, traditional medicine, etc., including availability, access, quality of services and affordability

Perceptions of health – understanding priorities. Health concerns affecting specific aspects of the population (e.g. farmers, fishermen, etc). Self-reported health status and perceptions on overall well-being

Literacy and numeracy – % of girls and boys able to read, write and understand basic maths – disaggregated by ethnicity, income status, age and gender

Attendance – % of girls and boys attending school regularly

Completion – % of girls and boys finishing primary, secondary and higher education

Access/affordability – availability and cost of attending school, education infrastructure and facilities (nursery to tertiary education). Teacher-student ratios. Adult education, vocational colleges and training

Quality – class sizes, teacher qualifications, teacher numbers
This section provides guidance and tools for managing relationships with stakeholders. Under the Social Way, every Anglo American site should engage with stakeholders on an ongoing basis across all stages of the asset lifecycle.

Specifically, this section:

- outlines the rationale and principles that underpin Anglo American's approach to stakeholder engagement
- assists sites in the identification, mapping and analysis of stakeholders
- details the requirements for a Community Engagement Forum (CEF) and an annual Stakeholder Engagement Plan (SEP)
- provides guidance on ensuring engagement respects Inclusion and Diversity principles
- describes the roles and responsibilities of different functions and the coordination and cross-departmental collaboration required.

Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. Stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities.

To enable business enterprises to assess their human rights impacts accurately, they should seek to understand the concerns of potentially affected stakeholders by consulting them directly in a manner that takes into account language and other potential barriers to effective engagement.

Box 3A.1 International standards

IFC PS
UNGPs

3. ENGAGEMENT AND ANALYSIS

3A.1 Introduction
Intended users

The intended users of this section are primarily the Social Performance teams. However, other functions involved in stakeholder engagement, notably Human Resources, Security and Health, Safety and Environment (SHE), should familiarise themselves with this guidance (see 3A.1 Introduction, Multi-disciplinary approach). It also applies to certain contractors.

Relevance to other sections

Ongoing stakeholder engagement is fundamental to all aspects of social performance and underpins and informs every section of the Social Way. It lays the foundations for sites to prevent and/or manage their impacts and risks and to contribute to the well-being of stakeholders.

The Social Way components are interconnected: each has requirements, processes and action plans that require ongoing, close internal collaboration and dialogue with external stakeholders.

- Governance (Section 1)
  - Guidance on capacity and skills needed and training available for development.
  - Emphasises the cross-functional collaboration needed for social performance, including stakeholder engagement. The Social Performance Management Committee (SPMC) is the primary vehicle for encouraging a consistent and co-ordinated approach to affected stakeholders.

- Review and planning (Section 2):
  - The baseline assessments and context review updated as part of sites’ five-year Review and planning provide information to understand stakeholders: who they are (including vulnerable stakeholders), the socio-economic context, how stakeholders might be affected and their interests and concerns.
  - The Social Management Plan (SMP) includes an evaluation of the previous year’s engagement activities, providing information on successes, emerging issues, constraints and gaps. It also summarises plans for the forthcoming year, noting any significant changes or improvements required.

- Engagement and analysis (Section 3)
  - Incident and Grievance management - grievance processes should be designed through stakeholder consultation, so they are properly targeted, understood and trusted. Records of incidents and grievances can provide insights into stakeholder concerns that can then be discussed and addressed through the ongoing stakeholder engagement process.
  - Social and Human Rights Impact and Risk analysis – engagement is fundamental to understanding potential impacts and risks. The link between stakeholder engagement and social and human rights impact and risk analysis is perhaps the most important in the Social Way.

- Impact and Risks prevention and management (Section 4)
Stakeholder engagement is explicitly embedded into each section within Impact and Risk Prevention and Management. Anglo American requires an approach that is compliant with IFC; i.e. an informed consultation and participation approach involving meaningful engagement on impacts, mitigations and benefits.

Socio-economic Development - the success of Socio-Economic Development (SED) projects depends on engaging stakeholders so they understand our approach. It means involving them in planning, design, implementation, and monitoring and evaluation processes. Through engagement, projects are done 'with' stakeholders as opposed to done 'to' them.

Cultural Heritage - Informed Consultation and Participation (ICP) is required for commercialisation of any tangible or intangible cultural heritage.

Indigenous Peoples - outlines the additional requirements and provides guidance for engagement with Indigenous Peoples.
3A.1 Stakeholder engagement

Guiding principles

The purpose of stakeholder engagement is to build mutually beneficial, long-term relationships with those who are affected by, or who can affect, a site or Anglo American more broadly. The more effectively sites engage, the more able and likely they are to address issues important to stakeholders. This leads to higher levels of trust and acceptance.

Under the Social Way, stakeholder engagement is underpinned by a set of guiding principles. It should be:

- **Dialogue-based** - Stakeholder engagement should create opportunities for a two-way discussion and for stakeholders to input into company decisions that affect their lives. This dynamic is the cornerstone of all aspects of social performance, from discovery through to closure.

- **Strategic** - Engagement should be outcomes based. A site's potential impacts, risks and long-term objectives should inform engagement priorities and be informed by stakeholder perspectives.

- **Proactive** - Activities should be pre-planned as far as possible. Early and regular communication is critical, allowing space for stakeholders to express any concerns and for the site to adjust its approach accordingly. Communication should provide stakeholders with the necessary information to meaningfully inform their position on issues and policies that affect them and our sites.

- **Clear and direct** - Information relevant to stakeholders should be communicated in ways that the audience will understand, based on their language, education, literacy level, interests and concerns. Engagement should be underpinned by openness and honesty about any potential adverse impacts and include explanations of who may be affected, when and how.

- **Inclusive** - It is important to engage with all affected stakeholders, including vulnerable groups, by using tailored engagement approaches. Engagement approaches should be designed to avoid creating or exacerbating any intra or inter community conflicts or power imbalances in communities.

- **Ongoing** - Engagement is a continuous, regular and iterative process. Reporting back to stakeholders is vital to
Stakeholder engagement fulfils several important functions. Sites should consider the areas depicted in Figure 3A.1 when planning their engagement activities.

**Figure 3A.1 Functions of stakeholder engagement**

- **Multi-disciplinary approach**
  Successful stakeholder engagement is a site-wide responsibility. While the Social Performance team will have lead responsibility for most local external relationships, some will be held by other departments. Clarity about the primary 'relationship-holder' and co-ordination between teams requires ongoing collaboration. Table 3A.1 provides examples of what this might look like in practice.

- **Local employees**
- **Labour unions**
- **Local contractors and sub-contractors working on site.**

**Box 3A.2 Internal stakeholders with an external presence**

- **Communicating information**
- **Understanding stakeholder perceptions/managing expectations**
- **Identifying and mitigating impacts and risks**
- **Facilitating decision-making**
- **Maximising opportunities**
- **Incident and grievance management**

Social Performance teams must be able to translate what they hear 'outside the fence' in a manner that resonates with internal management so that engagement results in action.
The boundary between internal and external stakeholders is porous: workplace information travels with employees off site, and vice versa. These employees may be the first to see warning signs of social problems or community unrest. Equally, dissatisfaction with conditions of work can precipitate unrest in the wider community. Human resources take the lead in relation to the workforce, while other departments will be responsible for specific contractors or sub-contractors, emphasising the importance of close collaboration.

Sites are required to develop a cross-functional Stakeholder Engagement Plan (SEP). This will ensure sites maintain a comprehensive record of stakeholders and engagement activities.

The Social Performance Management Committee (SPMC) (see Section 1) serves as the primary mechanism for co-ordinating this cross-cutting and multi-departmental approach to stakeholder engagement.

Site teams should ensure that responsibilities for engaging with regional and national level stakeholders relevant to the site's area of influence are clearly understood and aligned across different levels of the organisation (for example, with the communications and government relations teams at Business Unit (BU) and Group level).

Table 3A.1 Examples of cross-functional collaboration on stakeholder engagement

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
<th>STAKEHOLDERS</th>
<th>SUPPORTING DEPARTMENT</th>
<th>SUPPORTING ROLE IN RELATION TO STAKEHOLDERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Performance</td>
<td>Human Resources</td>
<td>Affected communities</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(individuals and households)</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Traditional leaders</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Community groups and civil-society organisations</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Political leaders</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Administrative authorities</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vulnerable groups partners</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Local NGOs</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Artisanal and small-scale miners</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social infrastructure and service providers</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Opportunistic migrants</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Local education providers</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Religious or faith-based institutions/organisations</td>
<td>( k )</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
<th>STAKEHOLDERS</th>
<th>SUPPORTING DEPARTMENT</th>
<th>SUPPORTING ROLE IN RELATION TO STAKEHOLDERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Resources</td>
<td>Security</td>
<td>Information on environmental, health and safety impact</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td>SHE</td>
<td>Operational updates</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td>Communications</td>
<td>Explaining technical policies, plans or procedures relevant to external stakeholders</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td>Operations/technical teams</td>
<td>Details of recruitment and procurement opportunities and requirements</td>
<td>( k )</td>
</tr>
<tr>
<td></td>
<td>Government Relations</td>
<td>Permitting/ regulatory updates</td>
<td>( k )</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DEPARTMENT</th>
<th>STAKEHOLDERS</th>
<th>SUPPORTING DEPARTMENT</th>
<th>SUPPORTING ROLE IN RELATION TO STAKEHOLDERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>k</td>
<td>fi</td>
<td>kfi</td>
</tr>
</tbody>
</table>

\[ fi = W \]

| A | k | fi | kfi |

| \( k \) | fi | kfi |

\[ fi = W \]

| \( k \) | fi | kfi |

\[ fi = W \]
Stakeholder engagement is a requirement at all stages of the asset lifecycle from discovery through to closure and post-closure. The scale, depth and nature of the engagement with stakeholders will fluctuate according to the precise stage, planned activities and the level of a site's impacts.

During discovery, the focus of engagement activities will be on doing a preliminary mapping of stakeholders, including identifying potentially vulnerable groups and Indigenous Peoples; explaining the mining process to stakeholders (who may have had little experience with the industry), including being transparent about potential impacts, risks and opportunities; and managing expectations.

During project development, it is likely there will be heightened stakeholder expectations about the future development of:  

- Police
- Military
- Security contractors
- Emergency service providers

Local businesses and business associations, Site suppliers, Contractors and subcontractors, Employees, Government relations, Social performance, Human resources, SHE, Supply chain, Communications, Operations/technical teams, Government relations, Government ministries, Regulator, Health agencies, Emergency service providers, Road traffic safety, Health and safety advice and warnings, Emergency preparedness and response protocols, Media (radio, TV, newspapers, social media), All departments in determining the criteria for contractors and suppliers, Opportunities to provide goods and services, Capacity-building on procurement requirements and how to understand supplier criteria, All departments in following protocols, Environmental impacts – identification, management and monitoring, Communication of policies, procedures, safety protocols, etc., Design of materials to communicate technical information, Planning and hosting events, Long-term business goals, specifically Life of Asset Plan, Project schedules and activities (e.g. construction, drilling, blasting), All departments in providing technical information for communication, Communication of government laws and regulations. 

- Media (radio, TV, newspapers, social media)
- Contractors, suppliers, employees, government relations, social performance, human resources, SHE, supply chain, communications, operations/technical teams, government relations, government ministries, regulator, health agencies, emergency service providers, road traffic safety, health and safety advice and warnings, emergency preparedness and response protocols, all departments in following protocols, environmental impacts – identification, management and monitoring, communication of policies, procedures, safety protocols, etc., design of materials to communicate technical information, planning and hosting events, long-term business goals, specifically life of asset plan, project schedules and activities (e.g. construction, drilling, blasting), all departments in providing technical information for communication, communication of government laws and regulations. 

- Media (radio, TV, newspapers, social media)
- Contractors, suppliers, employees, government relations, social performance, human resources, SHE, supply chain, communications, operations/technical teams, government relations, government ministries, regulator, health agencies, emergency service providers, road traffic safety, health and safety advice and warnings, emergency preparedness and response protocols, all departments in following protocols, environmental impacts – identification, management and monitoring, communication of policies, procedures, safety protocols, etc., design of materials to communicate technical information, planning and hosting events, long-term business goals, specifically life of asset plan, project schedules and activities (e.g. construction, drilling, blasting), all departments in providing technical information for communication, communication of government laws and regulations.
the site, requiring more in-depth engagement. Engagement during this phase will need to support other key processes and activities being undertaken, such as: regulatory and permitting processes; environmental and social impact assessments; land-acquisition processes and management programmes for physical and economic displacement; influx management; and early development and implementation of projects/programmes. A (see 3A.2 Guidance, Task 5) should be set up during the project development phase. Construction is likely to require extensive engagement with stakeholders on impacts and benefits and to address incidents and grievances. This will continue during operations—though, if properly managed, the level of potential impacts and risks should stabilise during operations.

Social transition needs to be considered in stakeholder engagement planning from the early stages of project development through to closure. Key aspects to keep in mind in relation to social transition and stakeholder engagement include:

- Involvement and agreement of stakeholders in the definition of the mine closure vision and post-closure land use through the (see 3A.2 Guidance, Task 5) and/or other appropriate processes.
- Identifying stakeholders relevant to social transition and understanding their requirements to inform strategic planning for closure and to establish closure criteria and success criteria.
- Alignment of the (see 3A.2 Guidance, Task 4) with the closure plan. The will outline more detailed requirements for engagements related to social transition as the mine nears closure.

Appropriate engagement is fundamental to stakeholders accepting the closure plan and to building external ownership of the plan and social transition success criteria over time. Please see the Mine Closure Toolkit V3.0 for additional information.
Plan
Do
Check
Act

The following provides a guide to managing ongoing stakeholder engagement following the Plan Do Check Act cycle for continuous improvement (see Figure 3A.2). A task-based approach is presented, although it should be noted that several tasks will be undertaken in an iterative rather than chronological order and that some tasks are ongoing.

**FIGURE 3A.2 THE CYCLE AS RELEVANT TO STAKEHOLDER ENGAGEMENT**

**PDCA**

**3. ENGAGEMENT AND ANALYSIS**

3A.2 Guidance

1. Review context
2. Understand impacts, risks and opportunities
3. Map stakeholders

4. Develop a Stakeholder Engagement Plan (SEP)
5. Participate in Community Engagement Forum (CEF)
6. Engage with stakeholders
7. Documentation
8. Monitor and evaluate
9. Track and analyse stakeholder perspectives and feedback
10. Adjust
11. Report
Task 1 – Review context

Contents in this section:

Task 1 – Review context
Task 2 – Understand impacts, risks and opportunities
Task 3 – Map stakeholders

PLAN

The plan phase includes collecting and analysing information needed to:

Task 1 – Review context

Sites are required to undertake updates to their baseline data and conduct a comprehensive context review every five years as part of Review and planning (see Section 2). This provides:

- an awareness of developments in the external context, with implications for a site's relationships with stakeholders.
- develop an SEP
- participate in a Community Engagement Forum and identify priority issues from the site's perspective for discussion at the CEF
- knowledge of the socio-economic, health, education and environmental conditions within a site's Area of Influence
- an understanding of the internal context; specifically, planned changes and activities with the potential to impact on stakeholders

The following sources may provide information relevant to stakeholder engagement that can be used to inform the context review:

- Analysis of input received via stakeholder input channels: Community Engagement Forum, incident and grievance records, community development requests, perception surveys
- Analysis and evaluation of internal reports and stakeholder data

Box 3A.4 Additional update sources

3. ENGAGEMENT AND ANALYSIS

Plan
In relation to stakeholder engagement and planning, Social Performance teams should draw on the baseline information gathered through Review and planning (and other sources as relevant; for example, incidents and grievances) and consider the following:

- Are there new operational activities and/or changes that require specific engagement programmes (large-scale maintenance, land acquisition, exploration, lifecycle transition)?
- For existing operational activities, have social-impact mitigations been effective? Do corrective actions require new or improved engagement activities?
- Has there been a change in the significance of any impacts and risks, and does that affect stakeholder engagement?
- Has there been a change in the operational footprint/Area of Influence that requires engagement with new stakeholders?
- What significant socio-economic or political changes have occurred in the area (shifts in the economy, strikes against big business, upcoming elections, emergence of or increase in inter or intra community conflict, natural disasters, etc.)?
- Are all legal and permit requirements being met with regards to social performance? If not, what is the role of engagement in improving compliance?
- Are community requests increasing or decreasing? Is closer collaboration needed with the Human Resources, Security or SHE teams to better explain developments and processes to stakeholders?
- Are there emerging themes in grievances that indicate a need for a different engagement approach, or that require stronger collaboration with other teams?
Identification of potential impacts and risks is a primary function of stakeholder engagement. Sites can only fully understand their actual or potential impacts through engagement. In turn, stakeholders can only assess the likely effect of impacts and help define prevention and mitigation measures if they are informed of, and consulted on, site activities and plans. Identifying stakeholders and issues that present risks or opportunities to the site itself must also be informed by engagement. Stakeholder engagement is intertwined with the annual, as well as issue-specific Management Plans (as relevant, see Section 4. Impact and Risk Prevention and Management).

As with impacts and risks, priorities should be assessed through a collaborative process. The perspectives, needs, concerns and ideas of stakeholders are fundamental elements in the development of sites' activities (see Section 4A).

The impacts, risks and opportunities and associated management measures identified through (see Section 3C), (see Section 4A) and issue specific Management Plans (as relevant, see Section 4. Impact and Risk Prevention and Management) provide a guide to identifying which stakeholders need to be engaged and on what topics.
The scope of stakeholder engagement is primarily defined by impacts rather than proximity. Sites have a responsibility to identify and engage all stakeholders affected by their activities. Stakeholder engagement should aim to include all impacted, as well as:

- The Area of Influence, defined as the area affected by:
  - the site's activities and facilities that are directly owned, operated or managed (including by contractors or third parties acting on the site's behalf).
  - the impacts from planned and unplanned developments caused by the site that may occur later or at a different location. These could include developments led by the site (including contractors) to support ongoing operations (e.g. stay-in-business (SIB) projects, Life of Asset developments, etc.), as well as predictable developments that are not managed by the site; e.g. expansion of a nearby town owing to site-induced in-migration. They also include cumulative impacts.
  - the indirect impacts on biodiversity or on ecosystem services upon which local communities' livelihoods are dependent; e.g. loss of fisheries resulting from water contamination.
  - the site's primary labour-sending and money-spending area(s); i.e. the towns and communities that are likely to experience economic benefits from the project.
  - surrounding areas that could potentially benefit from the project, such as sites of high biodiversity, protected areas, etc.
  - associated facilities, which are facilities that are funded separately by the company or a third party (e.g. government) but whose viability and existence depend (almost) exclusively on the operation, and without which the operation would not be viable.

The Area of Influence is defined (or revised) during sites' five-yearly Review and planning (see Section 2).
Stakeholder mapping and analysis

Stakeholder analysis is a process of gathering and studying information about stakeholders to determine whom to engage, about what, with what level of intensity, and with what frequency. It helps determine who to prioritise for engagement and which stakeholders require a tailored engagement approach, e.g., vulnerable groups or those with high levels of influence.

One of the aims of stakeholder analysis is to understand people's underlying motivations and analyse the root causes of stakeholder concerns or aspirations (though the cause does not alter the level of importance of the issue). Individuals have a variety of motivations for engaging with a site, ranging from wanting the best for their community through to a desire for personal or group gain. Understanding these motivations supports the design of relevant and effective engagement approaches.

Stakeholder analysis should also aim to understand:

- An impact v. influence/interest map provides an initial understanding of priorities for engagement. Table 3A.2 provides guidance on how to rate a stakeholder's level of impact and influence/interest. Greater weighting should be given to vulnerable stakeholders, who are likely to be disproportionately affected by impacts (see below for vulnerability assessment).
- While this type of map provides useful guidance on engagement priorities, Social Performance teams should continuously evaluate how the stakeholder may be affected by site activities.
- The stakeholder's level of interest in or expectations from the site and what these relate to.
- The stakeholder's history with the site, including previous engagements, involvement in projects, history of grievances or incidents.
- The stakeholder's level of influence on the site, via their influence on other stakeholders or directly, e.g., through decision-making around permitting.
- Which other individuals or groups the stakeholder may legitimately represent.
- Any areas of knowledge, expertise or capacity the stakeholder holds that may be relevant to the site in relation to managing potential social and human rights impacts and risks, or delivering opportunities. This includes capacity for mediation and conflict resolution.
- Any potential constraints to the stakeholder's participation in engagement activities (see section below on assessing vulnerability).
- Stakeholder preferences and responsiveness to different types of engagement and communication techniques. This may be based on cultural preferences, education levels, demographic factors or physical location.
- Stakeholders' direct or indirect involvement or association with any conflicts and the nature of this involvement (see Section 4J Conflict Management for further guidance on conflict analysis).
- Stakeholder attitudes and positions on different issues and towards other stakeholders.
review whether all stakeholders are being heard, and ensure disproportionate attention is not being given to those 'shouting the loudest'.

Table 3A.2 Stakeholder mapping: Impact and Influence/Interest ratings

<table>
<thead>
<tr>
<th>Impact rating</th>
<th>Definition</th>
<th>Influence/Interest rating</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIGH</td>
<td>The site has a potentially significant impact (positive or negative) on the stakeholder or stakeholder group and/or the stakeholder is highly sensitive to certain impacts.</td>
<td>HIGH</td>
<td>The stakeholder or stakeholder group is considered highly influential and/or has a strong interest in the site and may have the capacity to halt or delay the site's operations or shape the site's reputation locally and/or internationally.</td>
</tr>
<tr>
<td>MEDIUM</td>
<td>The site has a potentially moderate impact on the stakeholder. The stakeholder is moderately sensitive to certain impacts.</td>
<td>MEDIUM</td>
<td>The stakeholder is considered to have moderate influence over, and/or moderate interest in the site, with some capacity to influence the site's operations or reputation.</td>
</tr>
<tr>
<td>LOW</td>
<td>The site potentially has a minor impact on the stakeholder. The stakeholder is not considered sensitive to the site's impacts.</td>
<td>LOW</td>
<td>The stakeholder is isolated and/or has limited interest in the site and limited capacity to exert influence over the site.</td>
</tr>
</tbody>
</table>

Figure 3A.3 provides an example mapping matrix. Sites can use this technique to map all stakeholders or 'zoom in' to produce separate maps for stakeholder sub-groups or specific issues/activities. The map provides a better idea of the level of effort (time, resources) to allocate to the stakeholders in each quadrant.

Stakeholder maps are fluid: people's relationships and attitudes vary over time, and stakeholders may come and go. Social performance teams should review stakeholder maps on a regular basis.
Communities, groups or individuals who may be:
excluded or inhibited from meaningful participation in sites' engagement and decision-making processes
differently and/or more severely affected by a site's impacts
less able to take advantage of a site's benefits.

Box 3A.6 Site-related vulnerability – Social Way definition

Assess vulnerability in relation to engagement

Anglo American is committed to identifying and engaging with vulnerable individuals and groups. During the five-yearly
review and planning (see Section 2), sites are required to identify systemic vulnerability amongst communities, groups
and individuals and include the assessment in the [15x2804]. This supports a more precise identification of site-related
vulnerability (see Box 3A.6 above).

Vulnerability in relation to specific impacts is assessed through [583x2654] (see Section 3C) and vulnerability in accessing
benefits is considered in sites' planning (see Section 4A).

From the perspective of stakeholder engagement, the priority is to identify the extent to which individuals or groups might
be at risk of exclusion from the site's engagement processes. This may be because:

- they are marginalised from mainstream society and not normally included in community activities and discussions

Notes

The coloured circles represent different stakeholder groups. The lines linking stakeholders demonstrate connections between them (e.g., feedback links and influence connections). Levels of engagement from A to D are progressive, i.e., the objectives and tools/methods used for quadrant A will also apply in B, C, and D.
Sites can use Table 3A.3 to link the systemic vulnerability analysis summarised in the with engagement planning.

**Table 3A.3: Assessing vulnerability status and engagement priorities**

<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Systemic vulnerability (see Section 2 for definitions of Capitals)</th>
<th>Priority engagement issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community A</td>
<td>Economic Capital Based on the ratings (determined as part of the systemic vulnerability assessment done as part of Section 2), describe those issues that should be prioritised in engagement processes. For example, if Natural Capital is rated High, it would suggest that questions of land, clean air and water or bio-diversity may be particularly sensitive for this community.</td>
<td>Drawing on the analysis in Section 2, and with reference to Political and Social Capital in particular, list those stakeholders within the community most at risk of exclusion. Low access to Political and Social Capital within a community is the best guide to vulnerability in relation to participation and representation.</td>
</tr>
<tr>
<td>Political Capital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Social Capital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Physical Capital</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Capital</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Stakeholder register**

Sites should capture the results of stakeholder identification, mapping and analysis in a stakeholder register that is updated regularly, at least quarterly and more frequently if there are significant changes or developments. The register should be part of a stakeholder database, which will also include a consultation log and will be maintained on the site’s integrated Information Management System (see 3A.2 Guidance, Task 7).

**Box 3A.7: Data protection**

Any personal data must be managed in accordance with the Anglo American Group Data Protection Policy. Data must be processed:

- Appropriately: only process data when we have a lawful reason to do so; take extra care with very sensitive data; recognise and respect the rights of the people (data subjects) whose information we hold.
- Transparently: we must tell individuals when we are collecting their data and what we are going to do with it; we can only use personal data for the purpose it was intended. If we want to use it for something else then we need to go back to the ‘data subject’ and tell them.
- Securely: We must protect personal data from harm, whether accidental or malicious loss, destruction, damage and unauthorised disclosure. If there is a breach then we must act quickly, and report it to dataprotection@angloamerican.com immediately. We must not share personal data with anyone, unless this is deemed necessary. If it is, we must make sure the person or organisation we are sharing it with will give it the same protection we do. If it is with an external party a data sharing agreement may be needed.
- Responsibly: We must only collect and use the personal data we need. If it does not help to achieve our intended business objective, then it is off limits. We must make sure the personal data we process is...
We cannot keep hold of personal data forever. We can only store and process it for as long as it is required and then delete it.

The stakeholder register should cover the categories outlined in Table 3A.4:

<table>
<thead>
<tr>
<th>Stakeholder details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local /national/international level stakeholder</td>
</tr>
<tr>
<td>Stakeholder category (e.g. local authority, traditional leader, service provider, local community)</td>
</tr>
<tr>
<td>Name of stakeholder representative or group</td>
</tr>
<tr>
<td>Location of stakeholder and contact details</td>
</tr>
<tr>
<td>Stakeholders represented (who/number)</td>
</tr>
<tr>
<td>Sphere/extent of influence</td>
</tr>
<tr>
<td>Level/extent of impacts from the project/site on the stakeholder</td>
</tr>
<tr>
<td>Stakeholder mapping position (link to stakeholder mapping matrix)</td>
</tr>
<tr>
<td>Vulnerability status</td>
</tr>
<tr>
<td>Other key demographic information (as required for purposes of improving engagement): gender, languages spoken, age, ethnicity, livelihood/profession, literacy level, etc.</td>
</tr>
<tr>
<td>Summary of engagement</td>
</tr>
<tr>
<td>Overview of engagement (current and previous)</td>
</tr>
<tr>
<td>History of issues raised, incidents and grievances and how they were addressed (link to the incident and grievance register for full details)</td>
</tr>
<tr>
<td>Summary and status of commitments relevant to this stakeholder (link to the commitments register for full details)</td>
</tr>
<tr>
<td>Links to benefits or partnerships in relation to activities (local supplier to the site, CSI project beneficiary, programme partner, etc.)</td>
</tr>
<tr>
<td>Priority issues for engagement</td>
</tr>
<tr>
<td>Frequency of engagement</td>
</tr>
<tr>
<td>Methods of engagement</td>
</tr>
</tbody>
</table>

Anglo American key contact point
The information and analysis gathered through the PLAN stage will allow Social Performance teams to develop and implement their annual stakeholder engagement processes.

Task 4 – Develop a Stakeholder Engagement Plan

A Stakeholder Engagement Plan (SEP) is the annual tool for planning engagement. It summarises the stakeholder analysis (See 3A.2 Guidance, Task 3), identifies objectives and priorities, and outlines actions and responsibilities.

The SEP is a living document. It should be updated annually and reviewed on a regular basis to reflect changing site activities and contexts.

The components of a best-practice SEP are outlined in Table 3A.5. Note these components do not necessarily represent separate sections of the document - the important thing is that all these aspects are considered within the SEP.

Table 3A.5

<table>
<thead>
<tr>
<th>Components</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose of the document: scope, intended users</td>
</tr>
<tr>
<td>Description and map of the Area of Influence, including key aspects of the social context and how it might affect the engagement approach (e.g. literacy levels, languages spoken, Indigenous Peoples, cultural heritage, quality of life, inter or intra community conflict etc.)</td>
</tr>
<tr>
<td>Most significant social and human rights impacts as per SHIRA</td>
</tr>
<tr>
<td>Summary of previous engagement including any historical tensions or conflicts</td>
</tr>
<tr>
<td>Stakeholder perceptions and expectations from the site/project</td>
</tr>
<tr>
<td>Stakeholder analysis and map – outline of key stakeholders and vulnerable groups</td>
</tr>
</tbody>
</table>

3. ENGAGEMENT AND ANALYSIS
Background and analysis

Approach

Implementation

Monitoring and evaluation (see 3A.2 Guidance, CHECK)

Reporting (see 3A.2 Guidance, ACT)

Objectives and priority issues for engagement

Special measures required (if any) for specific stakeholders

Roles and responsibilities of Social Performance team and other departments

Action plan for the year: activities, tasks, responsibilities, timelines

Measures for documenting engagement activities

Systems and tools used for managing stakeholder data and engagement activities

Key Performance Indicators (KPIs)

Measures for monitoring progress and correcting emerging issues

Measures for collecting stakeholder input on engagement processes

Types of reports and description of:

- their contents, purpose and desired outcome
- Report developers and recipients (from whom and to whom)
- Frequency of each report

Considerations for setting stakeholder engagement objectives

<table>
<thead>
<tr>
<th>Functions of engagement</th>
<th>Considerations for setting objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEP</td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td></td>
</tr>
<tr>
<td>SMP</td>
<td></td>
</tr>
</tbody>
</table>

Table 3A.6 Considerations for setting stakeholder engagement objectives
Communicating information

What information does the site need to communicate over the coming year (policies, processes)? Are there changes or activities that should be flagged in advance? Is there new technology being introduced that stakeholders should be aware of?

Refer to Section 2. Review and Planning.

Understanding perceptions/managing expectations

What processes are needed to understand stakeholders' needs, concerns, interests and agendas in relation to the site? What do stakeholders expect from the site? Are there heightened expectations amongst certain stakeholders that need addressing?

Refer to Sections 2. Review and planning and 3B. Incident and grievance management.

Identifying and mitigating impacts and risks

What are the actual and potential impacts that should be discussed and assessed with stakeholders? How will emerging risks and issues be proactively identified through consultation? How will stakeholders be involved in impact-mitigation measures and opportunities?

Refer to Sections 3C and 4. Impact and risk prevention and management.

Maximising opportunities

What are the main activities planned for the coming year? Are there projects that need to be identified or finalised through consultation? Are participatory monitoring or evaluation activities needed?

Refer to Section 4A. Socio-Economic Development.

Facilitating decision-making

Drawing on the above, what are key decisions that need to be taken that require stakeholder input (impacts, opportunities, project changes, etc.). What processes need to be developed to ensure this happens in a collaborative way? How will stakeholder input be captured and considered in internal decision-making processes?

Note that stakeholder agreement is important, but unanimity is unlikely; this should not stop you from moving forward.

What progress will be made in establishing the or to improve its functioning? Does more need to be done to make it inclusive and participative? What issues or decisions should be discussed and agreed?

Refer to Sections 2. Review and planning, 3C. and 4. Impact and risk prevention and management.

Incident and grievance management

Are all internal and external stakeholders aware of the grievance process? Is stakeholder feedback on the grievance process captured and used to inform continuous improvement? Have there been recurring grievances, which indicate the need for better communication? Is follow-up engagement required on any specific incidents or grievances?

Refer to Section 3B. Incident and grievance management.

Managing commitments

Are all staff and contractors aware of how commitments to stakeholders are made and managed? Is the process for recording and tracking commitments working effectively? How are stakeholders kept informed about the status of commitments and in agreeing whether they have been satisfactorily fulfilled?

Refer to Section 2. Review and planning.

Building on the objectives, develop a table summarising the what, who and when of the main engagement activities. Table 3A.7 provides an example framework with a worked example:

<table>
<thead>
<tr>
<th>Function of engagement</th>
<th>Objective</th>
<th>Activities required</th>
<th>Support required from other departments</th>
<th>Stakeholders to be engaged/consulted</th>
<th>Timeline for the activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communication/expectations</td>
<td>Insert the objective(s) for this category</td>
<td>Summarise the main activities</td>
<td>Outline the support required from other departments</td>
<td>List the stakeholders to be engaged/consulted</td>
<td>Set the timeline for the activities</td>
</tr>
<tr>
<td>SHIRA</td>
<td>SED</td>
<td>CEF</td>
<td>SHIRA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Function of engagement</td>
<td>Objective</td>
<td>Activities required</td>
<td>Support required</td>
<td>Stakeholders</td>
<td>Timeline</td>
</tr>
<tr>
<td>------------------------</td>
<td>-----------</td>
<td>---------------------</td>
<td>------------------</td>
<td>--------------</td>
<td>---------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ensure stakeholders are aware of and understand the recruitment strategy for the construction phase of the expansion project</td>
<td>Develop explanatory messaging and communication materials around the recruitment strategy, informed by an understanding of stakeholder concerns, expectations and perceptions on the issue.</td>
<td>Communicate the recruitment strategy in a timely manner through face-to-face engagements, online, and distribution of written materials</td>
<td>Human resources – providing support to messaging and communication</td>
</tr>
</tbody>
</table>

**Special measures for engaging with specific stakeholders**

Describe the different types of engagement approaches that will be taken for specific groups, as needed; e.g. vulnerable groups, women, indigenous groups and powerful figures in the local community. Detailed guidance on the specific requirements for and approaches to engagement with indigenous peoples, including the development of a community engagement plan for indigenous groups, is provided in Section 4I. Indigenous Peoples.

**Engaging with vulnerable groups**

Examples of special measures that may be taken to address the barriers to participation for certain vulnerable groups include:

- Building trust with vulnerable individuals or households by assigning the same staff person to reach out to them personally on a regular basis ('case worker' model)
- Providing sensitivity training to the Social Performance staff who will be dealing directly with vulnerable groups
- Conducting home visits or one-on-one versions of larger public events
Consideration should be given to the potential vulnerability of human rights defenders and whether special measures are needed to engage them without compromising their safety. Please speak to Group Social Performance for further assistance.

Gender considerations in engagement

In certain cultural contexts it can be difficult to seek women's input and ensure their equal participation in engagement activities. While there is a responsibility to ensure the equal participation of all segments of the population, disrupting cultural protocol and gender norms can also damage stakeholder relationships. Options to help navigate this challenge include:

- organising the same events/gatherings in several different locations, and on different days
- holding activities after work hours or on weekends, and making public events ‘child friendly’
- continually stressing a commitment to confidentiality and demonstrating this commitment is met
- providing various ways for people to access information, register a grievance, ask a question, express opinions about a programme; e.g. toll-free phone numbers, in writing, in person via their regular company community liaison representative
- avoiding drawing attention to vulnerable groups or labelling them as such
- being mindful of perceived associations between the site and figures of authority or power. For example, avoid hosting events or posting information exclusively in public buildings in case a vulnerable person has had negative experiences with public authorities.

Speaking to women separately -

Even when women are not blocked from participating in public consultations, they may not express their true opinions or concerns, but rather echo those of their male relatives and traditional authorities. In these cases, consider organising a separate consultation for the women, where no men are present, if possible.

Speaking to women informally -

In communities where women don’t typically have positions of authority and are not accustomed to expressing their own opinion, a public forum may be intimidating. Try engaging women in informal settings or via an existing women’s group or association.

Identifying issue-specific opportunities for consultation -

There may be numerous opportunities to engage with women outside explicit consultation processes; for example, during health visits or in the context of developing or monitoring initiatives. Participation in such meetings can help to build relationships and potentially provide a safer space for women to express themselves more freely on other topics.

Having female staff initiate engagement with women -

Have male staff find a pretext to speak to the men, while female staff speak to the women. This way, the male community authorities will not feel undermined.

Keeping traditional authority figures informed -

Show respect for cultural norms and protocol by informing, or, if necessary, asking permission from the community authority or male head of household. If necessary, cite company policies and international standards as the reasons for engaging women separately.

Including women in the Community Engagement Forum:

When planning community forums, make sure women are represented and specifically invited to participate. Make it as easy as possible for them to attend (e.g. making meetings child friendly and picking meeting times that won’t interfere with domestic tasks).
Roles and responsibilities

The roles should outline the roles of different members of the Social Performance team, the SEP and other functions in managing stakeholder engagement (See 3A.3 Management and Resources for further guidance). Other functions will need to share how they plan to engage with the stakeholders they have primary responsibility for so that this information can be integrated into the overall site. This can be captured using a Department Stakeholder Management Form, which is shared with the Social Performance team. The form should include the information indicated in Table 3A.8:

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Contact information</th>
<th>Priority (based on mapping)</th>
<th>Engagements over the coming year</th>
<th>Support required from Social Performance Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Resources</td>
<td></td>
<td></td>
<td></td>
<td>Monthly reports on incidents and grievances</td>
</tr>
<tr>
<td>Labour Minister's name</td>
<td></td>
<td></td>
<td></td>
<td>Monthly meetings re. ___</td>
</tr>
<tr>
<td>Location</td>
<td></td>
<td></td>
<td></td>
<td>Awareness messaging on gender diversity in workplace</td>
</tr>
<tr>
<td>Contact no.</td>
<td></td>
<td></td>
<td></td>
<td>Updates on internal grievances</td>
</tr>
<tr>
<td>Labour unions</td>
<td></td>
<td></td>
<td>D (inform, consult, collaborate and partner)</td>
<td></td>
</tr>
<tr>
<td>Rep. name</td>
<td></td>
<td></td>
<td></td>
<td>Monthly reports on incidents and grievances</td>
</tr>
<tr>
<td>Location</td>
<td></td>
<td></td>
<td></td>
<td>Monthly meetings re. ___</td>
</tr>
<tr>
<td>Contact no.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Labour unions</td>
<td></td>
<td></td>
<td>D (inform, consult, collaborate and partner)</td>
<td></td>
</tr>
<tr>
<td>Rep. name</td>
<td></td>
<td></td>
<td></td>
<td>Monthly reports on incidents and grievances</td>
</tr>
<tr>
<td>Location</td>
<td></td>
<td></td>
<td></td>
<td>Monthly meetings re. ___</td>
</tr>
<tr>
<td>Contact no.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Keep the strategic - the SEP is a strategic document that explains the rationale for your engagement activities and approach. The actionable part of the SEP (what needs to be done, when, how, by whom) is necessary, but only represents one component of the SEP. Mistaking a database (or information management system) for an SEP does not constitute an SEP. The SEP is the approach, the database/information system is a supporting tool.

The SEP is too conceptual (required actions are not clear) - an SEP should provide a detailed plan for accomplishing activities. Activities are too focused on delivery of projects - often at the expense of taking the time to study emerging issues and concerns, which can later manifest in grievances. The SEP is not adapted to changing needs - the same approaches and activities are undertaken year after year.

Box 3A.8 COMMON PITFALLS

![Diagram](image-url)
after year, without analysis or evaluation to determine whether activities were effective, or contexts have changed.

Activities focus too much on local or regional government and community authorities—administrative and traditional leaders may not represent the interests of all segments of the population. The project may not be implemented properly because Social Performance staff and resources get diverted to unforeseen operational priorities.

The implementation section of the plan summarises the actions that will be undertaken for that year. Detailed planning (with activities, tasks, responsibilities, budget, timelines) can be captured in an annual planner/engagement schedule that forms part of the Stakeholder Database, preferably held in an online information management system. The planner should be reviewed on a weekly basis and updated as necessary.

The planner should capture not only the schedule of engagement activities, but also the actions and activities that will be undertaken to achieve the overarching stakeholder engagement objectives; e.g. undertaking perception surveys; training needed to support the set-up of the CEF; and design and development of tools and materials to support engagement such as newsletters or social media-channels.
Introduction to Community Engagement Forums - 
[https://youtu.be/gUOdMhDwwPc](https://youtu.be/gUOdMhDwwPc)

Under the Sustainable Mining Plan, one of Anglo American's visions is to transform the relationship between mines and communities and wider society. To help achieve this vision, all sites are required to establish a Community Engagement Forum (CEF). The site-level CEF should cover local communities within the site's Area of Influence, meaning people living nearby that could be directly or indirectly affected by any mining-related activities. The geographic limits that represent can be decided on a case-by-case basis based on the nature of impacts experienced in different areas, as well as local cultural, political and geographical circumstances. A Guidance Note on establishing a forum is provided in the Tools section.

The CEFs are designed to facilitate open and accountable dialogue and build greater mutual trust. CEFs are one means amongst many that promote greater accountability and should not replace other stakeholder engagement or participatory monitoring mechanisms.
Depending on the size and context of affected communities, separate forums may need to be established. For example, where indigenous peoples are present a separate Indigenous Peoples Engagement Forum may be required (see Section 4I. Indigenous Peoples).

Anglo American's commitment to stakeholders includes:

- taking responsibility for our activities and associated impacts and being open and transparent about what they are
- timely disclosure of information that affects (or could potentially affect) stakeholders
- consulting communities on actions that affect them, including both mitigation and community development initiatives, and being evaluated on behaviour, actions and results
- clarity on the rights and responsibilities of different stakeholders.

Box 3A.9 Accountability

The Sustainable Mining Plan accountability goal aims to demonstrate that Anglo American is operating responsibly and has earned stakeholder trust through open communication. In this context, aim to strengthen the participation of stakeholders in shaping, monitoring and evaluating sites' social performance. Stakeholders should understand and accept the responsibilities that come with participating in the and partnering to achieve its objectives.

Stakeholder expectations for communication and engagement, at all levels of society, are changing – both in terms of mechanism and scope. We need to respond to this and provide local stakeholders with a forum for engagement that is genuinely collaborative. Ensuring a participative approach to the establishment and running of such forums is therefore essential to securing a sense of co-ownership and commitment amongst stakeholders. This may include, for example, the use of virtual platforms to support any face-to-face structures.

**Box 3A.10 Definition of a forum**

**Key objectives**

- **Participatory** – stakeholders are co-owners of the forum and involved in its design and management.
- **Inclusive** – all community voices are heard and considered.
- **Representative** – participants in the forum represent their communities' interests and communicate back to the wider community in a timely manner.
- **Cross-functional** – understood and supported by internal stakeholders; for example, by timely disclosure of Anglo American commitments and policies, site plans, and environmental monitoring data.
Community Engagement Forum, Review and Planning, and Sites should consult external stakeholders through the when setting long-term social performance objectives as part of the five-year baseline and planning process described in Section 2. The aim is to jointly review and develop the long-term objectives and milestones to strengthen accountability and build a sense of partnership and common endeavour.

Progress should then be jointly reviewed and assessed with the on an annual basis, in addition to the more in-depth five-yearly review of long-term objectives. The can also be used as a platform to discuss and agree the site's closure vision and post-closure land use for social transition.

The will play a central role in the public disclosure of the five-year Stakeholder Accountability Report (SAR), which summarises the site's for external stakeholders. The can be shared with members for comment before being finalised and signed-off by the . Once the report has been finalised and made public, members of the should share the responsibility to disclose it more widely to the stakeholders they represent. members should also be involved in the annual review of the .

Sites should consult the as part of the social and human rights impact and risk analysis process (see Section 3C).

Information about potential social and human rights impacts and risks should be shared with the and management responses should be discussed. Consider the need for capacity building or use of independent technical advisors to help members understand the risk and impact assessment process and results.

Supportive – providing capacity-building where necessary to allow for meaningful collaboration among participants.

Ambitious – aiming to achieve true partnership on issues that affect stakeholders.

Well-governed – established with a clear set of principles, governance structure, and procedures for decision-making. There must also be a system to communicate information, recommendations and decisions made by the back to the site (i.e. through the ), and for there to be meaningful consideration and response to such information.

SPMC

Properly resourced – sufficient company time and resources are allocated to allow for its effective operation - including the need for external resources such as third-party facilitators, independent technical experts, legal experts, interpreters or translators.
Guidance on engagement approaches

Different engagement approaches are required, depending on what is being discussed and with whom, logistical or time constraints, cultural context, and stakeholder needs and preferences. Table 3A.9 describes different engagement approaches that can be used to disclose information, receive feedback, and for more in-depth processes of informed consultation and participation.

Task 6 – Engage with stakeholders

1 requires that projects with significant adverse impacts on affected communities follow a process of Informed Consultation and Participation (ICP).

Focuses on an in-depth exchange of views and information. It is an organised and iterative process that uses tailored consultation and engagement approaches for different stakeholders, including vulnerable groups. Through an ICP process, stakeholders should be able to discuss the management and mitigation of impacts, how implementation of management measures can be tailored, and identify mechanisms for sharing and capitalising on development benefits and opportunities.

The consultation process should (a) capture both men’s and women’s views if necessary, through separate forums or engagements, and (b) reflect men’s and women’s different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate. The outcomes of this process should feed into site’s decision-making processes.

The guidance provided in this section is aligned with an informed consultation and participation process.

Box 3A.11 Informed Consultation and Participation

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3. ENGAGEMENT AND ANALYSIS

Do
When planning engagement, sites should establish when it may be unproductive (or dangerous) to deal directly with stakeholders and find alternative ways of engaging them. This may be relevant where stakeholders appear inaccessible (high-profile politicians, activists, opposition groups, etc.) and may require sites to identify third parties to engage with those intermediaries instead. (See Section 4J. Conflict Management).

Recognise also that peaceful protest by stakeholders is an important aspect of a free and participative democracy and should be acknowledged as a legitimate form of expression.

Table 3A.9 Engagement approaches

<table>
<thead>
<tr>
<th>Method</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Written correspondence (letter/email)</td>
<td>For formal communication</td>
</tr>
<tr>
<td>Posters, flyers, newsletter</td>
<td>To disseminate information</td>
</tr>
<tr>
<td>Local media (newspaper, radio, social media)</td>
<td>Invitations or announcements To reach stakeholders who are less likely to participate in face-to-face engagements</td>
</tr>
<tr>
<td>Website</td>
<td>To acknowledge receipt of incidents and grievances and to update stakeholders on how their issues, incidents and grievances have been addressed</td>
</tr>
<tr>
<td>Surveys and feedback forms (face-to-face, telephone, SMS/text, postal, email or online)</td>
<td>Periodically update stakeholders about the operation and mine-related initiatives in a simplified way using diagrams and short, simple descriptions using non-technical language</td>
</tr>
<tr>
<td>Town halls or public meetings</td>
<td>To explain the Grievance Process and share contact details</td>
</tr>
<tr>
<td></td>
<td>To advertise job vacancies and local-procurement opportunities</td>
</tr>
<tr>
<td></td>
<td>To announce key news or messages to a wide range of stakeholders</td>
</tr>
<tr>
<td></td>
<td>To announce upcoming public meetings and events</td>
</tr>
<tr>
<td></td>
<td>To disclose information regarding employment and procurement opportunities, provide specific progress updates</td>
</tr>
<tr>
<td></td>
<td>To share stories about past events</td>
</tr>
<tr>
<td></td>
<td>Public disclosure announcements for environmental and social impact assessments (ESIAs) and resettlement action plans (RAPs)</td>
</tr>
<tr>
<td></td>
<td>To share contact details and inform stakeholders about where they can get more information</td>
</tr>
<tr>
<td></td>
<td>To host documents/e.g., meeting minutes, agendas for upcoming meetings</td>
</tr>
<tr>
<td></td>
<td>To gather qualitative or quantitative data, information and feedback from a wide range of stakeholders for assessment and monitoring purposes</td>
</tr>
<tr>
<td></td>
<td>To gain a better understanding of stakeholder needs, issues and concerns</td>
</tr>
<tr>
<td></td>
<td>To gain a better understanding of stakeholder perceptions towards the operation</td>
</tr>
<tr>
<td></td>
<td>Formal meetings to meet with a wide range of stakeholders, especially local communities</td>
</tr>
</tbody>
</table>
|                               | To present information and seek feedback from stakeholders using presentations, posters, models, non-technical
<table>
<thead>
<tr>
<th>Method</th>
<th>Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open day/open house</td>
<td>Invite stakeholders to review information at site or in an accessible location at their own pace and at a time that suits them, using posters, information boards, visual aids, leaflets. Staff the open house to answer questions and guide stakeholders through the information. Gather feedback, views, opinions from targeted stakeholders. Enable stakeholders to speak freely and confidentially about sensitive issues. Allow for in-depth discussion about specific issues. Build personal relations with stakeholders. Gather baseline data. Use to respond to incidents and grievances as necessary. Allows for vulnerable group or gender-sensitive consultation. Allows open, in-depth discussion and joint development of solutions to specific issues between targeted groups of stakeholders. Can be supported by delivery of a presentation or handouts to communicate key messages, or by guidance/questionnaires to facilitate the discussion. Allows for vulnerable group or gender-sensitive consultation.</td>
</tr>
<tr>
<td>One-to-one interviews/meetings</td>
<td>Planning effective messaging is vital, as it: information leaflets, video and visual aids, and question-and-answer sessions. Share information about upcoming studies and disclose results of completed studies; e.g., ESIs, RAPs. Invite stakeholders to review information at site or in an accessible location at their own pace and at a time that suits them, using posters, information boards, visual aids, leaflets. Staff the open house to answer questions and guide stakeholders through the information. Gather feedback, views, opinions from targeted stakeholders. Enable stakeholders to speak freely and confidentially about sensitive issues. Allow for in-depth discussion about specific issues. Build personal relations with stakeholders. Gather baseline data. Use to respond to incidents and grievances as necessary. Allows for vulnerable group or gender-sensitive consultation.</td>
</tr>
<tr>
<td>Focus groups/small group meetings</td>
<td>Present information to a group of stakeholders sharing similar interests. Share technical documents. Get feedback, views and opinions. Build formal relations with high-level stakeholders. Present information to a multi-stakeholder group. Facilitated discussion where all participants have equal status. Allows stakeholders to provide their views, opinions and questions in an open format. Can use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies. Can be one-off or part of regular working groups or forums.</td>
</tr>
<tr>
<td>Formal meetings</td>
<td>Set the record straight with regards to rumours that might be circulating about the site's activities. Helps clarify misunderstandings about the site's or project's activities.</td>
</tr>
<tr>
<td>Workshops/roundtables</td>
<td>Ensures all company staff/representatives are saying the right thing and the same thing – especially regarding sensitive issues.</td>
</tr>
</tbody>
</table>
Social Performance teams should consider compiling key messages (see Table 3A.10) for all departments to use when engaging with stakeholders. The messages should be developed in collaboration with the relevant department, team or subject matter expert and designed in conjunction with the Communications team.

### Table 3A.10 Types of key messages

<table>
<thead>
<tr>
<th>Types of key messages</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>About a specific activity or milestone</td>
<td></td>
</tr>
<tr>
<td>About a specific issue</td>
<td></td>
</tr>
<tr>
<td>About a process, policy or programme</td>
<td></td>
</tr>
<tr>
<td>About the operation in general</td>
<td></td>
</tr>
<tr>
<td>Disclosure of findings</td>
<td>ESIA, population resettlement, compensation calculations, Grievance process, Compensation calculations, Land rehabilitation plans, Disclosure of findings, Production goals/milestones, Project delays, Population resettlement, Disclosure of findings, ESIA, Grievance process, Compensation calculations, Land rehabilitation plans, Project delays, Community development activities, Negative discourse by activists</td>
</tr>
</tbody>
</table>

Key messages should be:
- Clear, concise and consistent.
- Presented in a format and language that the target group can understand, avoiding jargon or technical language.
- Adapted to the interests and concerns of the target group: don't just tell them what the company wants them to know.
- Properly prepared, particularly when involving information that may be unfamiliar or controversial for stakeholders.

Internal planning documents should be shared with other teams and with site management and could include:
- Frequently asked questions or answers to difficult questions
- Fact sheets
- Company position statement

Communicated in an accessible way, taking into account:
- Popular news sources (local radio, social media, newspapers, word of mouth).
- Literacy levels

### Box 3A.12 Principles underpinning key messages

- Clarity
- Conciseness
- Consistency
- Accessibility
- relevance
Consensus-based decision-making is an approach that invites input from stakeholders on company decisions. Although it can sometimes be a slower form of decision-making, it also enhances trust, motivation, innovation and ensures that stakeholders become more involved and invested in the site's activities, potentially leading to better quality and more sustainable outcomes. While the CEF is one mechanism that encourages participative decision-making, sites should consider how they promote the approach through different areas of stakeholder engagement.

Box 3A.13 Issues benefiting from a participative decision-making approach

Figure 3A.4 shows the varying degrees of participation in decision-making with stakeholders:
The highest level of participation, where decision-making is delegated fully to stakeholders, is only likely to be appropriate in certain situations, as the company has existing commitments to regulators, shareholders and other internal and external stakeholders that must be considered in decision-making processes. Depending on the context and issue, company involvement may also be necessary to provide technical advice and assist in the development of viable options.
Task 7 – Documentation

Contents in this section:
Task 4 – Develop a Stakeholder Engagement Plan
Task 5 – Participate in a Community Engagement Forum
Task 6 – Engage with stakeholders
Task 7 – Documentation

Whether documentation is in hard or soft copy, the following tools will be required to adequately document stakeholder engagement. It is recommended that the action planner/engagement schedule, stakeholder register, consultation log and monitoring and evaluation framework are managed in one database, preferably an online information management system. Remember that sites should apply the guidelines for data protection in the design and operation of this management system – see Box 3A.7 Data Protection for further details.

Stakeholder register (see 3A.2 Guidance, Task 3): an ongoing and regularly updated inventory of all stakeholders and their contact information.

Action planner/engagement schedule (see section 3A.2 Guidance Task 4): Forward-looking plan of activities and upcoming engagements, including activity, tasks, resources, budget and timelines.

Consultation log: to record all material exchanges with stakeholders, both planned and unplanned, formal and informal, including at a minimum:
- dates and locations of engagements or other correspondence
- purpose of engagement
- people in attendance (external and internal. For external stakeholders, link details to the stakeholder register)
- information shared
- issues/questions raised, management responses and stakeholder satisfaction with response
- commitments made (link to commitments register)
- follow-up actions required and timeline/responsibilities (this may include an action to engage internally on...
Stakeholder engagement activities may intersect with other social functions and documentation tools. For example:

- Issues raised during the engagement or actions for further external engagements
- A link to an incident and grievance register, if any were identified through the engagement
- Additional comments and next steps
- A facility to link to saved scans or copies of letters, emails, community notices, notes for the record, attendance registers, photos, and videos. These should be labelled with a code that matches the corresponding entry in the consultation log.

**Monitoring and evaluation framework**
(see 3A.2 Guidance, Task 8)

Meeting minutes/notes for the record and attendance lists:
- Formal or important meetings should be written down and minutes approved to create an agreed record of discussions, agreements, and actions. These should be accompanied by attendance lists and, where relevant, photos. Label the minutes to match the corresponding entry in the consultation log. A brief note for the record should be completed for informal engagements if significant issues were raised, a commitment was made, or follow-up action is required.

**Links to other social management tools**

- Incidents and grievances (see Section 3B)
- Commitments (see Section 2)
There are two main elements that Social Performance teams should put in place to monitor and evaluate their stakeholder engagement processes:

Task 8 – Monitor and evaluate is designed to track implementation and verify the effectiveness of stakeholder engagement activities. Under the Social Way, indicators for all impacts on, and processes relating to, external stakeholders should be recorded and tracked in the Social Way Monitoring and Evaluation Framework (see Section 1). In relation to stakeholder engagement, the objectives are framed in the SEP CEF. Table 3A.11 provides an example of what might be included using an example of establishing a.

Selecting indicators to measure outcomes and effectiveness of engagement

Indicators for stakeholder engagement often draw on useful but simplistic measurements, such as numbers of consultations held and frequency and level of attendance at events. While necessary, particularly in relation to tracking activities and outputs, they provide few insights into the actual value of individual initiatives or the process as a whole. Indicators for outcomes and effectiveness should reflect some or several of the following considerations:

Internal monitoring and evaluation (M&E) against stakeholder engagement objectives

External input from stakeholders.

M&E

SEP

CEF

- Quality of participation – numbers are important in determining interest, but so are the level and nature of contributions by stakeholders. Silence may indicate a lack of understanding, a lack of interest or a lack of trust. Equally, excessive interventions by certain stakeholders can disrupt meetings and inhibit the participation of others.

- Representation – who attends, who doesn’t, which stakeholders contribute and which don’t can be a useful guide as to whether certain groups feel excluded or intimidated.

- Inclusivity – Social Performance teams should explicitly record their interactions with individuals or groups identified as vulnerable in the SEP. This will allow them to track whether the site’s engagement processes are reaching all segments of the affected population. Challenges should be noted and addressed through updates to the SEP.

- Analysis and information – while engagement can be valuable in and of itself, it should also provide both site and

3. ENGAGEMENT AND ANALYSIS

Check
## Table 3A.11 Example indicators

<table>
<thead>
<tr>
<th>Function of engagement</th>
<th>Objective (each function might have more than one objective)</th>
<th>Long-term target</th>
<th>Interim milestone</th>
<th>Annual objective</th>
<th>Annual activities</th>
<th>Annual inputs</th>
<th>Annual outputs</th>
<th>Annual outcomes</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communication/expectations</td>
<td>Impacts</td>
<td>Opportunities</td>
<td>Facilitating decision-making</td>
<td>2030 goal: to establish multiple levels of open and accountable dialogue leading to greater mutual trust</td>
<td>In 2030, 90% of survey respondents report high levels of trust towards Anglo American</td>
<td>In 2030, third-party endorsement of quality of engagement and dialogue processes between site and local community</td>
<td>2022 members all regularly participate in meetings</td>
<td>2025: high-quality dialogue and programmes flowing from the forums (verified by third party)</td>
<td>In 2025, 65% of community survey respondents report high levels of trust in the site</td>
</tr>
</tbody>
</table>

### Notes
- CEF: Control, Evaluation, Feedback
- ToR: Terms of Reference

### Additional Information
- A: Action
- k: Key indicator
- ? k: Question mark indicating uncertainty or need for further clarification.
Assessing the effectiveness of stakeholder engagement is a continuous process. Corrective action may address the concerns of one group, while creating new ones among others. This emphasises the importance of ongoing tracking and analysis of stakeholder perceptions and attitudes – towards the site but also in relation to one another. Some ways to encourage and record feedback include:

- Documenting informal and formal dialogue: documenting and reviewing feedback received during discussions and conversations in the consultation log and analysing themes; reporting feedback and results of analysis to other functions and the stakeholder register and engagement schedule as needed.

Meetings should provide valuable insights into how different stakeholder groups are feeling at any given time. An effective CEF, with legitimacy among stakeholders, can be both an early-warning mechanism for emerging frustrations and a pressure valve to air concerns in a constructive way.

Media monitoring: Record and track issues raised by stakeholders in the media and on social media channels.

Incident and grievances: documenting, analysing and reporting on recurring incidents and grievances, including key themes and key stakeholder/stakeholder groups affected (see Section 3B).

Commitments: Documenting and reporting stakeholder satisfaction with progress and close-out of commitments.

Some of the sentiments that stakeholders express may be based on perception rather than fact, and the degree to which the criticisms are founded or not will require further study. Even when untrue, unfavourable perceptions have the potential to damage the company's reputation and relationships. It will be important to determine if negative perceptions are based on poor site performance or a lack of communication or engagement that has led to gaps in understanding.

For these reasons, all recurring complaints and criticisms warrant careful consideration. They should be documented and should inform the stakeholder engagement approach and messaging.
Understanding perceptions

There are many mechanisms available to learn what stakeholders are saying and thinking about the site:

- Perception surveys
- SMS surveys
- Media monitoring
- Analysis of grievances and consultation logs
- Informal engagement (anecdotal evidence, conversations)
- Formal engagement (public consultations, structured discussions on specific topics or with specific groups)

CEF
The final part of the Plan-Do-Check-Act process is to put findings into action.

Task 10 – Adjust

The status of existing stakeholder engagement activities and feedback from stakeholders should be reviewed as part of regular Social Performance team meetings and meetings. This ensures that the Social Performance team and other functions are kept up to date on what stakeholders are saying, so that this can be considered in ongoing decision-making and planning processes.

Social Performance teams should conduct an annual review of the previous year's engagement and use the lessons learned to plan for the forthcoming year. The review should happen as part of the development of the Plan (see Section 2).

Table 3A.12 provides an overview of the issues to be covered in the review.

<table>
<thead>
<tr>
<th>Issues to be discussed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Performance team resources and capacity</td>
</tr>
<tr>
<td>Socio-political and internal context</td>
</tr>
<tr>
<td>Cross-functional approach</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Have there been any major changes in internal team capacity for stakeholder engagement?</td>
</tr>
<tr>
<td>How adequate is the size of the team in relation to its engagement responsibilities?</td>
</tr>
<tr>
<td>Does the team lack expertise in certain areas or specialist skills?</td>
</tr>
<tr>
<td>Were there any major changes in the external/internal operating environment (legal / regulatory, political or socio-economic, project changes, etc.) that affected engagement activities/outcomes?</td>
</tr>
<tr>
<td>Was the team able to respond to these changes?</td>
</tr>
<tr>
<td>To what extent were other functions involved in engagement activities and information-sharing?</td>
</tr>
<tr>
<td>Are there specific issues (e.g. security, environment) where more support is required?</td>
</tr>
</tbody>
</table>

3. ENGAGEMENT AND ANALYSIS

Act
Issues to be discussed

Stakeholder mapping and analysis
Previous Stakeholder Engagement Plan
Stakeholder engagement
Stakeholder input (community meetings, grievances, consultation logs, opinion surveys)
Internal reporting

- Was there adequate co-ordination between departments?
- Did the stakeholder mapping paint an accurate picture?
- Have there been any significant changes amongst stakeholders – either in terms of numbers or dynamics?
- Were any groups (especially vulnerable groups) missed or neglected?
- Were the activities in the appropriate and effective?
- Were the activities planned in the undertaken on schedule and to budget? Why/why not?

KPIs

- Were the anticipated outputs achieved on schedule? What were the outcomes, and how effective were they?
- Are the capturing the information needed to evaluate success?
- Do objectives need to be adjusted?
- What was the general feedback and what does this tell us about the status of the relationship with stakeholders, their levels of understanding of site activities, and their key areas of interest/concern?
- Were there any notable successes or challenges?
- What are the likely priorities for the forthcoming year based on the feedback?
- Was reporting provided in a clear and timely fashion?
- Was it effective in communicating priorities to the relevant Managers?
Reporting in relation to stakeholder engagement is multi-layered. As well as monitoring progress against the stakeholder engagement objectives, a key aim of reporting is to communicate stakeholder feedback so that it is considered in relevant internal decision-making and planning processes e.g. around project design, impact-mitigation measures and benefits.

For this to be effective, it is important that the Social Performance team understands the type of information that other functions need and present it in a way that makes sense to those functions. Reporting lines include:

**Social Performance team –** within the site social team, it is helpful for stakeholder engagement staff to develop regular (weekly or twice-monthly) reports to submit to their Head of Department (HoD), ideally through team meetings at which each staff member presents both a written and verbal update and analysis. The written report could be an update to the framework or present highlights in the form of a dashboard automatically generated from the stakeholder database.

**M&E Heads of Departments (HoDs) –** At each meeting, the Social Performance manager should provide a brief overview of issues emerging from stakeholder discussions and consultations, including:
- Both proactive and reactive engagement activities
- Feedback from stakeholders that could require or inform management decision-making; e.g. change in project design or stakeholder issues or concerns that departments need to consider before undertaking an activity
- Plan deviations and the corrective actions taken
- Any support or input required from managers and other functions
- A 'dashboard style' summary (e.g. colour-coded) so the reader can get a snapshot of the current situation at a glance
- Comparisons with data from previous reports, or use visual elements to demonstrate any trends or fluctuations (e.g. graph)

### 3. ENGAGEMENT AND ANALYSIS

Act
stakeholder issues that could present obstacles or delays
summary of grievances submitted.

Business Unit (BU) and Group – reports to the
and Group should be developed as part of
reporting (see Section 2) and should summarise progress towards meeting objectives defined in the
; any priority and/or
emerging issues identified through engagements that require tracking or active management; and a narrative update
on the overall status of the relationship with external stakeholders and their perceptions towards the site (split as
necessary according to stakeholder group or location), highlighting any changes and the reasons for those.

External reporting – the is the ideal mechanism for ongoing reporting on benchmarks and progress to external
stakeholders. Ensure the report contents are stakeholder-oriented (what do stakeholders care about, what aspects
affect them and what do we need them to know?). Comprehensive reporting to external stakeholders is conducted
on a five-yearly basis through the Stakeholder Accountability Report (see Section 2).
Stakeholder engagement is a specialist role that requires systematic management, dedicated resources and active support from all levels and functions of the company.

Table 3A.13 lays out internal roles and responsibilities in relation to stakeholder engagement. In building and growing Social Performance teams, managers should bear in mind the following common mistakes:

- Having the same staff person implement both engagement and benefit-sharing roles (projects, compensation). These are separate roles requiring different skills that are best managed by separate people. The stakeholder engagement person within a site Social Performance team needs to focus on building relationships and collecting information from the community. If stakeholders see this person as the 'doorway' to accessing money or other privileges, relationships and dialogue, quality may be compromised.

- Focusing on staff numbers rather than skills. Quality of engagement processes matters more than quantity of engagement. Teams require multiple skills (e.g. database management capacity as well as facilitation capacity) that may be difficult to find in one person. Be realistic about competency and the point at which a separate role/person/resource may be required.

- Staff fatigue or complacency. One of the risks of dealing with communities is that staff can become complacent and fail to take stakeholder concerns as seriously as they should. Fatigue management and peer-to-peer triangulation of information can help.
Table 3A.13 Roles and responsibilities in stakeholder engagement

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>GROUP</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Group Social Performance</td>
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<td></td>
<td>Principal</td>
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<td></td>
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<td>BUSINESS UNIT HEAD OF CORPORATE AFFAIRS</td>
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<td>SITE SOCIAL TEAM</td>
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<td>SOCIAL PERFORMANCE MANAGER</td>
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<td>COMMUNITY RELATIONS MANAGER</td>
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Stakeholder engagement is misunderstood

Other departments may not fully understand the Social Performance team's role. It may be assumed that stakeholder engagement is the sole responsibility of the Social Performance team, and the team's main purpose is to 'put out fires' and facilitate other department activities. The Social Performance team will need to raise awareness internally of the role each department needs to play for everyone's collective success.

Insufficient team co-ordination

Don't assume that because team members work in close physical proximity to each other they are sufficiently aware of each other's activities. Formal and systematic co-ordination mechanisms, such as weekly meetings, daily field reports, or activity calendars posted on the office wall, are critical.

Limited training

Training on engagement should not be restricted to Social Performance staff. Consider a standard 'social induction' or presentation of that nature for all workers and partners who interact with local communities.

Provides advice and input on how to meet Anglo American requirements and international standards and best practice

Provides input on stakeholder relations to support plan development

Ensures alignment on implementation

Receives regular updates through quarterly reports

Engages with some stakeholders

Collects inputs from other plans (HoDs, SED, etc.)

Gains understanding of intended engagement by other site teams

Identifies, maps and analyses stakeholders, with input from other teams and management

Analyses and prioritises engagement topics and issues

Develops/updates sections of the Stakeholder Engagement Plan

Co-ordinates/supports the development of components relating to other teams/functions

Defines actions together with HoDs, if required
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Consider the need for independent facilitation in the process of establishing a forum. A facilitator should be viewed as independent and objective by all stakeholders; have experience in community engagement and establishing multi-stakeholder working groups or committees; be familiar with mediation and facilitating dialogue; and have knowledge of the local context. In some cases, at least to begin with, it may also make sense for an independent facilitator to moderate forum meetings.

Capacity-building of internal and external stakeholders should be provided as needed to support effective participation in the establishment and running of the forum. Consider the following needs and ensure the necessary skills (internal or third-party) and resources are in place to address them:

- Administrative and logistical
  - e.g. to enable participatory monitoring or to allow members to understand business processes, financial and budget information, technical reporting
- Technical
- Communication and presentation: to allow members to meaningfully participate in meetings, but also to enable effective communication between forum members and the wider community that members represent
- Facilitation
  - Managing conflict or disagreements.

The steps in Figure 3A.5 outline the recommended process for establishing a forum. These steps will feed into each other and will not necessarily happen consecutively.
Step 1 – Establish baseline - What are the existing structures/platforms/working groups, etc. – who participates, who do they represent, what is their purpose, what issues do they address, who do they benefit most? What are the drivers for establishing a forum? Use this to identify the need for new forums or opportunities to work with existing structures.

Step 2 – Stakeholder analysis - Use the results of stakeholder mapping and analysis (See 3A.2 Guidance, Task 3) to identify potential participants in the based on different interest groups, affected communities, vulnerable groups, existing leadership, etc. Identify decision-makers and influencers in the community, and which members of the community are generally excluded from decision-making. The results of stakeholder analysis should be used to identify any potential challenges to establishing a due, for example, to existing power dynamics and relationships between different stakeholder groups. Potential needs for

FIGURE 3A.5 ESTABLISHING A COMMUNITY ENGAGEMENT FORUM

1. ESTABLISH BASELINE
2. STAKEHOLDER ANALYSIS
3. RISK, CHALLENGES AND OPPORTUNITIES ASSESSMENT
4. CONSULTATION
5. SELECTING MEMBERS
6. CO-DEFINING VISION, SCOPE AND MANDATE
7. TOR/CONSTRUCTION AND GOVERNANCE STRUCTURE
8. PUBLIC DISCOURSE
9. MONITORING AND EVALUATION

k

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fi
Step 3 – Risks, challenges and opportunities’ assessment - Identify and assess potential risks, challenges and opportunities and associated mitigation measures (see Table 3A.14 below).

Step 4 – Consultations - Develop a consultation plan and engage with internal and external stakeholders about the establishment of the forum.

Step 5 – Selecting members - As part of initial consultations, a process for nominating and electing forum members should be agreed with stakeholders. For example, an interim committee could be established with a fixed term mandate to set up the forum, including defining the election or appointment process for members. Alternatively, elections for permanent members could be held upfront within the community and elected members could then be tasked with finalising the set-up of the forum.

Determine how many participants should be included. There is a balance to be struck between ensuring inclusive representation of affected stakeholders and keeping the size of the forum at a manageable level. Also consider the need for a quota for the composition of members to ensure representation from traditionally under-represented groups; e.g. for female membership, youth, or ethnic minorities.

Step 6 – Co-defining vision, scope and mandate: use a participatory process with selected representatives to develop a consensus on the overall purpose of the forum, its main objectives and how it will function. Be open-minded, flexible and willing to change an approach based on stakeholder input. Depending on the context, one overarching forum might be enough, with options to have sub-committees on specific issues (e.g. environmental monitoring, social investment, cultural heritage, local employment). These may be permanent (established as part of the Terms of Reference (ToR)) or linked to a specific time-bound commitment or initiative. It may make sense to begin with a limited mandate and build from there. In other contexts, it may make sense to have more than one forum e.g. based on geography.

Step 7 – Terms of Reference/Constitution and governance structure: determine the forum’s governance structure.

Initial consultations should be undertaken to: a) introduce the concept of the forum (or repurposing/strengthening an existing forum); b) understand stakeholders’ views on what a forum might look like, who should be involved and what issues it should address; c) identify legitimate representatives to participate in setting up the forum and; d) begin to build stakeholder buy-in for the forum.

During the planning stages, identify and engage with vulnerable or less-represented groups to understand how they would like to participate in the forum, either directly or through representatives.

Following these initial consultations, engagement with internal and external stakeholders should continue throughout the process of establishing the forum in order to give timely feedback, explain next steps and continue to build awareness and support for the forum.

Internal consultations are also important to build understanding of the value and purpose of the forum and ensure necessary resources are dedicated to it.

Be clear with stakeholders about any limitations, including on potential geographic constraints, time, finances and resources available. Consider whether there are any limits on information that can be shared (e.g. confidential information) and the decision-making power of the forums on different issues. Be prepared to explain why the limitations exist.
with selected representatives and draft a or similar founding agreement based on legal advice and third-party facilitation as needed (see the tool on sample for guidance on what this might look like). Also establish the practical arrangements for the running of the forum (see Forum Planning Checklist tool). Establish in advance what will happen to the forum in the case of sale, care and maintenance or premature closure, and write this into the Rules can be written into the to ensure the forum is not dominated by certain individuals or interests and to establish responsibilities of members; for example:

Step 8 – Public disclosure: to announce establishment or launch of the forum (if it is a new entity). A series of engagements may be required to ensure that local stakeholders are aware of the forum and that they understand its purpose, who represents them, how they can engage and how members can be held to account.

Step 9 – Monitoring and evaluation: Ongoing to measure:

- Progress towards establishing a forum (in establishment phase)
- How well the forum is functioning (in operations phase)
- The impact the forum is having on the relationship between the site and its stakeholders (see Guidance, Task 8) (in operations phase).

The amount of lead time, resources and flexibility needed when establishing and developing a forum is often underestimated. It can sometimes take years for a fully-functioning, resilient, accountable forum based on mutual trust to evolve. Be prepared for setbacks, disagreements and other challenges. Manage expectations about the timeline for the forum by providing regular updates to internal and external stakeholders about Box 3A.14 COMMON PITFALLS!
progress or setbacks. Unexplained delays could cause stakeholders to lose trust in the process and in the site's commitment to establishing the forum.

The following should be factored in when considering the time required to establish a forum:

- Time required for community representatives to share and gather feedback from their communities
- Time required for institutional stakeholders to make decisions/establish consensus in accordance with their processes and protocols
- Time required to build internal support and get the right cross-functional participation in the process
- Managing expectations/pressures from company stakeholders to meet timelines based on internal reporting or fiscal schedules
- Time needed to build capacity of forum members and trust between members to enable meaningful participation in discussion and joint decision-making
- Changes in local context, e.g. elections

Risks, challenges and opportunities

Table 3A.14 provides an overview of some of the potential challenges and opportunities of establishing a... Following the steps above will help to mitigate many of these challenges and enhance the opportunities. Additional actions to mitigate the risks and take advantage of the benefits are provided in the table.

<table>
<thead>
<tr>
<th>RISKS/CHALLENGES</th>
<th>DESCRIPTION</th>
<th>ACTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of buy-in from external stakeholders</td>
<td></td>
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<tr>
<td>Lack of buy-in from management or other functions</td>
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<tr>
<td>Stakeholder fatigue or confusion at having another engagement forum</td>
<td></td>
<td></td>
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<tr>
<td>Local conflict or politics hinders process of establishing a forum</td>
<td></td>
<td></td>
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<tr>
<td>Low capacity of members of the forum and asymmetry in knowledge/influence between members</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td>Allow time to understand and respond to stakeholder concerns, objections, and questions</td>
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<tr>
<td>CEF</td>
<td>Ensure Social Way requirements are understood</td>
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<tr>
<td>CEF</td>
<td>Dedicated internal co-ordinator</td>
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<tr>
<td>CEF</td>
<td>Appoint functional 'forum champions'</td>
<td></td>
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<tr>
<td>CEF</td>
<td>Reporting on progress and outcomes of the forum</td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td>Understand appetite for new forum, potential tensions with existing structures and sensitise stakeholders on how any new structure will differ</td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td>Understand existing community divisions, tensions and politics. If groups cannot be brought together, consider the need for establishing separate forums or having virtual forums that avoid the need for physical meetings</td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td>Transparent engagement processes to avoid perceptions of favouritism or bias</td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td>Messaging around the neutrality of the forum</td>
<td></td>
</tr>
<tr>
<td>CEF</td>
<td>Understanding of potential power imbalances, relationship/influence mapping</td>
<td></td>
</tr>
</tbody>
</table>
RISKS/ CHALLENGES

DESCRIPTION
Lack of support from authorities owing to perception that forums undermine their role for decision-making, oversight or monitoring

Forum not seen as truly representative and perpetuates power imbalances/exclusion of some groups

Lack of trust between members hinders effective functioning of the forum

The forum becomes a ‘talking shop’ that does meet its objectives around transparency, dialogue and trust

Confidentiality issues

OPPORTUNITIES
Promotion of goodwill and partnership opportunities as stakeholders see we are trying to solve development challenges and create value for others. Expectations are also managed better as stakeholders increasingly understand the limits of what sites can provide and the responsibilities of others

Improved understanding of local stakeholders’ concerns, interests, capacities and knowledge feeding into improved decision-making and planning processes

Creation of an enabling environment so that new capital or exploration projects can be pursued without local opposition

Greater understanding of cumulative impacts and collaboration to address them

ACTIONS
Consult local government on the remit of the forums
Inclusion of local government representatives in setting up and participating in running of forums
Anonymous grievance and feedback mechanism
ToR mechanisms to monitor, evaluate and report on the forums and outcomes they are achieving
Process for all members to report regularly on progress against commitments made
Look at wider processes/practices/behaviours needed to engrain the principles of accountability into the standard way of doing business
Set agendas for forum meetings
Solicit feedback from stakeholders on how forums and wider stakeholder engagement processes can be improved
Mechanisms to monitor, evaluate and report on forums and the outcomes they are achieving
Guidance from Group/BU on decision-making around what can/cannot be publicly disclosed
Set expectations around scope of forums, and provide clear justification for issues not open for discussion
Establish internal processes to get sign-off from relevant levels of the business before making commitments or sharing company information
Be ready to respond to invitations to partner
Continue to look for opportunities for learning and improvement; e.g. re-look at terms of agreement for forums every few years
Share learning and invite other private sector players to join or replicate what has been done
Systematic record keeping, monitoring and evaluation so that learnings can be captured, documented and fed back to site
Build learning from forums into participatory stakeholder engagement processes for projects and exploration opportunities early on
Invitation to other operators to participate in forums either as guests or members and/or share learnings with them
3A Tool 2 – Community Engagement Forum: Sample Terms of Reference

<table>
<thead>
<tr>
<th>Item</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of support from authorities owing to perception that forums undermine their role for decision-making, oversight or monitoring</td>
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3A Tool 2 – Community Engagement Forum: Sample Terms of Reference

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Introduction

Context for the forum

Legal considerations
As applicable

Definitions
List of definitions in the, as needed

Purpose and objectives
Overall purpose/vision/objectives and scope of the forum

Function

Membership

Governance

Administration

Operation

Committees/ programmes (including monitoring)

Budget

ToR

What will the forum do, how will it work e.g. advisory role, monitoring role, sharing information

Resources and rules of use e.g. meeting space, social media

Process for making and responding to recommendations

How commitments are agreed, tracked, reported on

Forum composition i.e. who is represented, dedicated positions for groups/ communities/ structures

Roles and responsibilities of members

Member selection/appointment process

Tenure – how long do members serve on the forum, what are the circumstances and process for replacing or removing members e.g. non-attendance at three consecutive meetings without apology or valid reason; evidence of failure to liaise with community

Code of conduct

Dispute resolution

Conflict of interest

Reimbursements (e.g. for travel expenses)

Capacity-building

Composition/ selection/ tenure of executive (as needed) and chairperson

Forum decision making and voting procedures

Details of secretariat role and other administrative roles to support the functioning of the forum, as needed

Rules of procedure for meetings

Minimum frequency

Meeting location(s)

Moderation/facilitation (if needed)

How agenda is set

Confidentiality

Participation of non-members (e.g. regulator, non-governmental organisation representatives, technical experts, site staff)

Details of any permanent committees or work programmes, including reporting responsibilities

Details of process for establishing ad hoc committees/work programmes

Budget items and source of funding

Financial audit/ reporting (as needed)
### Planning

- Has a baseline; stakeholder analysis; and risks, challenges and opportunities assessment been done to inform the establishment of the forum(s)?
- Is there a consultation plan for engagement with internal and external stakeholders about the forum?
- Is there an agreed process for internal and external stakeholders to participate in establishing the forum?
- Has a third-party facilitator been contracted to assist with establishing and running the forum, if needed?

### Governance

- Has the vision, scope and mandate of the forum been agreed with the local community?
- Has a Terms of Reference (ToR) and governance structure for the forum been agreed?
- Does the ToR include a mechanism to periodically review/ update the ToR and membership?
- Does the ToR include terms to support achievement of the objectives set out in the Social Way guidance (3A..2 Task 5 – Participate in a Community Engagement Forum)?
- Does the ToR include rules to encourage equal participation in the forum by all members?
- Does the ToR stipulate the process for decision making?
- Is the need for sub committees and the rules for these clearly stipulated and agreed to in the ToR?
- Does the ToR stipulate what members will be provided when attending meetings? e.g. transport allowance, refreshments, accommodation if coming from far away? (Note: it is not recommended that members are remunerated for their participation in the forum).

### Resourcing

- Is adequate internal resourcing (staff time, money, equipment) to support the establishment and participation in the forum in place?
- Is adequate funding, from internal or external sources, in place to support operation? E.g. funding for venue hire, transport, logistics, refreshments, communications.
- Is there a need for an independent funding mechanism for activities/programmes coming out of the forum? If yes, is there a plan on how this will be established, funding options etc?
- Is there a capacity building programme in place, if needed, to support members' participation in the forum and/ or community engagement with the forum?
- Is there a mechanism in place to periodically review the need/scope for capacity building?

### Membership

- How will members be selected?
What is the tenure of members?
Are member roles and responsibilities clearly articulated in the And have members acknowledged/accepted these?
Does the code of conduct outline expected behaviour of a member both in forum meetings and outside, when they are acting as a representative of the forum?
Are the consequences of members not fulfilling their responsibilities defined in the or equivalent?
Are grounds for termination or replacement of membership agreed in the or equivalent and understood?
Are there rules in place to manage conflict of interest, defined in the?
Has a process for dispute resolution been agreed and defined in the?
Meeting organisation/administration
What is the minimum frequency of meetings (e.g. at least quarterly)?
Where will meetings be held and what will the format of meetings be? Has provision for members to participate remotely been made, if needed?
Who will organise/administer the meetings (invitations, bookings, registration, follow-ups, presentation material, time keeping etc.)? Has that been agreed in the or equivalent?
How will meeting agendas/work programmes be agreed? Is that defined in the, if needed?
Are the rules for chairing the clearly stipulated in the (e.g. selection of chair, rotation of chair)?
Have provisions been made to make meetings interactive and inclusive for all members e.g. in terms of language, accessibility, assistance for people with disabilities, timing of meetings, venue, seating arrangements.
Who will be available to answer technical questions at the meeting? (internal or external guests)
What mechanisms will you use to capture all the meeting proceedings and exchanges -- minutes, audio-video recording, attendance list? Who is responsible for managing this and has it been agreed with members?
Where will meeting records be kept and who will have access?
How will meeting records be shared with forum members?
If there are sub-committees, how will these report back to the main forum?
Communication and reporting
Does the communication plan for the forum cover both internal and external stakeholders including vulnerable groups?
Is there a mechanism in place to gather and respond to feedback from stakeholders about their perception/expectations of the forum?
Who will liaise with the media (if applicable)?
If a dedicated website or social media page is used for the forum, have the necessary permissions been secured for sharing content online and is there a dedicated resource to monitor and update the site as needed?
How will the forum report back to communities on an ongoing basis on activities, spending, decision-making etc? How will that be monitored?
How will feedback from the forum be communicated to internal (site) stakeholders on an ongoing basis such that it can inform planning and decision making? How will that be monitored?
How will you follow up with participants to address the questions, concerns and suggestions raised at the meeting?
Do you have a process to get the necessary permissions from members before disclosing any reports, photographs or statements from the forum to the wider community?
Monitoring and evaluation
Have been identified to measure progress towards establishing the forum and to monitor its ongoing functioning?
Have been agreed with forum members to monitor and evaluate the effectiveness of the forum?
3B Incident and Grievance Management

3B.1 About Incident and grievance management

The Anglo American Social Way Policy requires all sites to have a grievance management procedure in place, and to screen all grievances and further investigate where appropriate.

In addition, the Social Way Policy and the Learning from Incident Group Standard require all sites to have a Learning from Incident procedure in place. This procedure should cover incidents with social consequences. All incident investigation, management and close-out should align with the Group Standard on Learning from Incident.

S&SD

1

"Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance."

"To make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted."

Box 3B.1 International Standards

IFC PS

UNGPs

In the context of this section, a grievance refers to a complaint from an external stakeholder. The grievance process outlined in this section aims to manage complaints from external stakeholders. Grievances from a local employee about conditions of work on site should be handled through the company's internal human resources processes. However, if a suitable operational level employee grievance mechanism is not in place at a site, the grievance mechanism described in this section may be used by employees as a channel to raise concerns. In such situations the grievance should be referred to the HR team to address and close out.

A grievance expressed by an employee about an environmental impact in his/her community would be addressed.
through the grievance process; i.e. an employee may also be considered an external stakeholder when he/she is also a community member. The line of accountability depends on the principal role the person is assuming and the nature of the grievance he/she is making when lodging the complaint – employee or community member.

This section provides guidance on effective management of grievances from external stakeholders and on incidents that have social consequences, aligned with both IFC Performance Standards (IFC PS) and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Specifically, this section provides guidance on:

- Intended users
- Relevance to other sections
- definitions and explanations of incidents and grievances
- developing a grievance management procedure
- developing a Learning from Incident procedure
- incident classification and categorisation
- investigating incidents
- resolution of grievances.

Governance (Section 1)

Section 1 provides an overview of the Social Performance Management Committee (SPMC). The SPMC provides the internal forum to raise and discuss incidents and grievances, as well as determine remediation measures if and as necessary.

Review and planning (Section 2)

The baseline assessments and context review, updated as part of sites' five-year social performance planning, provide the information required to determine the design of the grievance process. The context review also includes a review of trends around grievances and incidents.

Engagement and analysis (Section 3)

Stakeholder Engagement – consultations with stakeholders are essential in ensuring the grievance process is appropriately designed, understood and trusted.
Social and Human Rights Impact and Risk Analysis – grievances and incidents provide an important source of information on risks and (potential) adverse impacts. Impact and risk prevention and management (Section 4)

Grievances and incidents may arise in relation to contractor social management, community health and safety management, emergency preparedness and response, security management and the Voluntary Principles on Security and Human Rights (VPSHR), land access, displacement and resettlement, site-induced migration, cultural heritage, indigenous peoples, conflict management and artisanal and small-scale mining management, as well as about socio-economic development opportunities. Investigation results should inform improvements to mitigation measures and controls.
3B.1 About Incident and grievance management

**Definitions**

**Incident**: An unwanted event which instantaneously or over the course of time harms or otherwise negatively impacts (internal and/or external) people, the environment, company assets (i.e. plant, property, or equipment) and/or the company's reputation. It is an unwanted event which leads or may lead to the actualisation of risk. An incident can have one or more consequences (material losses/damage/business interruption, harm to people safety, harm to people occupational health, environment, legal and regulatory, social, and reputational) as per the Anglo American Group Risk Matrix.

**Issue**: Issues are questions, requests for information, or general perceptions. If not addressed well, issues may become grievances. Issues do not have to be registered as grievances, but they should be recorded so that emerging trends can be identified and addressed before they escalate (see Section 3A).

**Learning from Incidents (LFI)**: an investigation process used for all incidents, independent of consequence level and consequence type. The process consists of related steps which ensure incidents are reported, investigated, learnings are shared, and corrective and preventative actions are communicated and closed-out in a consistent manner. This will ensure that, as an organisation, we collectively learn from incidents, and the effectiveness of controls is continually reviewed and improved to prevent similar incidents (repeats) from occurring.

**Incident with social consequence(s)**: an unwanted event related to site activities that has an adverse impact on the health and safety of external stakeholders, or results in an actual impact on external stakeholders or contractor workers economic welfare, personal and political security and/or cultural heritage. An incident with social consequences may arise from a site's technical failure or accident, or a failure to anticipate, prevent or mitigate an impact. All incidents with social consequences should be investigated under the LFI process.

**Grievance**: a specific allegation or complaint relating to the site, its policies, activities, real or perceived impacts or the behaviour of its employees or contractors. Grievances are an expression of dissatisfaction with the company on the part of stakeholders. Grievances can be expressed through physical action (e.g. protests, road blockages, land invasions); verbally (in the course of discussions with site staff, etc.); or in writing. All screened-in grievances should be recorded as both a grievance and an (actual or potential) incident and should be investigated using the LFI process. Some grievances,
such as protests or road blockages, may have financial, legal, and/or reputational consequences for the site. These should not be classified as incidents with social consequences, but as incidents with financial, legal, and/or reputational consequences as appropriate, and should also be investigated using the process.

Actual consequence rating: a consequence rating assigned to all incidents, based on the actual unwanted event; i.e. what actually happened.

Potential consequence rating: a consequence rating assigned to all incidents, based on a reasonable worst-case scenario; i.e. what could have happened.

Preliminary consequence rating: a preliminary (actual and potential) consequence rating is assigned to an incident before investigation, based on the preliminary and often incomplete information available at the time.

Final consequence rating: a final (actual and potential) consequence rating is assigned to an incident after investigation, based on all information collected as part of the investigation. Therefore, the final consequence rating may differ from the preliminary consequence rating.

Near-miss: A condition where the release of the hazard and/or exposure to the hazard in an uncontrolled manner does not result in harm (i.e. no injury, ill-health, damage, etc.). Near-misses should be recorded as potential incidents.

Hazard: Source or situation with the potential for harm.

Grievance process: the process for receiving, recording, and resolving grievances.

Objectives

Incident and grievance management is an effective way for both reinforcing positive long-term relationships with stakeholders and to detect issues early on that may result in risks to the business if not addressed. Incident and grievance management is not a substitute for stakeholder engagement, but can be valuable in multiple ways:

- The aim is not to achieve zero grievances. The desired outcome is a process where stakeholders are comfortable sharing information and engaging the company in dialogue. Zero or very few grievances may be an indicator that the grievance process is not effective and could suggest that it is either not known, not accessible, not trusted or not used appropriately by site staff. As awareness of the grievance process spreads among external stakeholders, the volume of reported
- to ensure unwanted events with negative impacts on external stakeholders are dealt with swiftly and appropriately
- to allow sites to identify and correct problems before they recur or escalate into more serious problems
- to elevate sites' credibility and reputation by demonstrating that they listen to stakeholders and take their complaints seriously
- to offer an additional means to track and monitor impacts and risks
- to provide insight into stakeholders' understanding (or misunderstanding) of site policies, activities and behaviour
- to provide an efficient and low-cost means of resolving disputes and remedy, where appropriate
- to avoid tension and conflict with stakeholders resulting from neglect or mismanagement of grievances.
Grievances may increase significantly. This is not unusual and is often temporary. Figure 3B.1 below shows the typical volume flow of a well-functioning grievance process. Regardless of a site’s social performance, external stakeholders will always have grievances of some kind – it is a normal part of any business.

Figure 3B.1 Typical volume flow for a well-functioning grievance process

Lifecycle planning

The policy requirements for a site-level grievance management procedure and a Learning from Incident procedure apply across all stages of the asset lifecycle. The grievance process should be designed to be proportionate to the level of risk and potential impacts.

A grievance management procedure and Learning from Incident procedure will continue during the closure execution phase (decommissioning phase) and subsequent monitoring and maintenance phase. Resourcing for the procedures should be reviewed as the site moves through each stage of closure. During the monitoring and maintenance phase, when there is a much smaller physical presence on site, it may make sense for these procedures to be managed at a different level or by another nearby site. The grievance management procedure should also be updated to reflect any changes to site resourcing and any changes should be clearly communicated to stakeholders.

Box 3B.2 Closure planning: social transition

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The Social Way follows the Plan Do Check Act (PDCA) management process. The guidance in this sub-section is structured accordingly. For the purposes of this section, encompasses the process of designing, implementing and monitoring grievance and incident management.

### 3. ENGAGEMENT AND ANALYSIS

#### 3B.2 Guidance

- Develop a Grievance Management Procedure
- Ensure Grievance Process follows UNGP Principles
- Develop an Integrated Incident Management Procedure
- Conduct stakeholder engagement
- Receiving grievances
- Screen grievances
- Log grievances
- Respond to grievances
- Categorise grievances
- Assign a consequence level
- Notify internal stakeholders
- Investigate grievances/incidents
- Resolve grievances and remediate harm
- Adjust
- Report

1. Monitor and evaluate
Figure 3B.2 The cycle as relevant to incident and grievance management
Task 1 – Develop a Grievance Management Procedure

The grievance management procedure should detail the grievance process. Guidance for designing the grievance process is outlined in the ‘Do’ section of this guidance. The grievance process should be designed to follow the effectiveness criteria for grievance mechanisms outlined in the UNGPs (see 3B.2 Task 2).

The grievance management procedure is an internal document that outlines, at a minimum:

- The channels through which external stakeholders can submit a grievance.
- The process, timelines, and roles and responsibilities for:
  - screening grievances received
  - recording grievances received, including where the grievances will be recorded (in which system or register)
  - responding to grievances received
  - categorising grievances received and assigning a consequence rating
  - internal notification of grievances received and internal reporting on grievance management.
- The Monitoring and Evaluation Framework, including Key Performance Indicators (KPIs), used to monitor and evaluate the effectiveness of the grievance process.
- The roles and responsibilities for resolving a grievance, including management sign-off, and a description of the appeals mechanism in place should the complainant be unwilling to accept the proposed resolution.

Box 3B.3 State-based judicial and non-judicial mechanisms

3. ENGAGEMENT AND ANALYSIS
Site-level social incident and grievance mechanisms are not a substitute for state-based mechanisms.

Site procedures should make it explicit that site-level mechanisms are not the only means of accessing remedy: affected stakeholders should be provided with information on alternative mechanisms; state and non-state based.

Guidance on the above is provided in this section.

Any standardised forms used for registering and following up on grievances with the complainant. These might include:

- A registration form detailing the nature of the grievance, the date it was received, and the complainant's contact information and signature.
- A close-out form for resolved grievances, describing the measure(s) taken to resolve the issue, with signatures from the company and the complainant to attest to their mutual satisfaction.
Task 2 – Ensure Grievance Process follows UNGP Principles

The grievance process can only be effective if intended users are aware of it, trust it, understand it and use it. If the grievance process is poorly designed or implemented, not only is it ineffective, but it can also compound frustrations amongst affected stakeholders. The principles below serve as a checklist for ensuring that the grievance process functions as intended. These principles reflect the effectiveness criteria as outlined in the UNGPs.

**Participative:**
- The more collaborative the design process, the more effective the grievance process is likely to be.
- Consulting with stakeholders in advance can help ensure that the grievance process meets their needs and that they will use it. This is particularly important in the case of Indigenous Peoples (see Section 4I) who may have very specific customs for raising and resolving grievances within their community. Sites should:
  - Consult with communities on the design of the grievance process. Practical difficulties (literacy, geographically dispersed communities, connectivity), customary or cultural issues, and difficulties in making the grievance process accessible to all stakeholders (including women and vulnerable groups) should be identified and factored into the design process.
  - Regularly solicit feedback from external stakeholders on the design and function of the grievance process. Incorporate that feedback into the analysis and continued improvement of the grievance process.
  - Formalise the grievance process: make sure that every step is documented, consistent, and known to stakeholders.
  - Survey stakeholders, formally and/or informally, about their perceptions of the grievance process (would they use it? If not, why not?). If feedback indicates that stakeholders don't trust the grievance process, find the root causes and adjust the grievance process or the engagement approach accordingly.

**Legitimate:**
- The process must be “trustworthy” otherwise, stakeholders are unlikely to use it. Sites should:
  - Plan
Accessible: barriers to access of the grievance process must be identified and removed (e.g. lack of awareness by external stakeholders of the grievance process, language, literacy, physical location, fears of reprisal, costs for transportation). Sites should:

Predictable: stakeholders' trust in the grievance process is enhanced through a predictable and reliable process to handle and respond to grievances. Sites should:

Equitable: affected stakeholders usually have less access to information and expert resources than businesses. The grievance process needs to be a fair and impartial process. Sites should:

Transparent: regular communication with the complainant about the progress of the management of their grievance is essential to retain confidence in the grievance process. The idea is to limit opportunities for (and perceptions of) backdoor deals, favouritism, bribery or other types of unethical practices. The grievance process also protects staff by making it clear to all involved parties that no individual company representative has the sole decision-making power about a grievance resolution. Sites should:

Provide external stakeholders with different ways of presenting a grievance (e.g. phone, face to face, in writing, email). The more options there are, the more likely an external stakeholder will be able to find a channel that suits his/her needs. There should also be an option to submit grievances anonymously or via third parties in case the complainant wishes to remain anonymous and receive feedback via an intermediary.

Consider the most vulnerable segments of the population in the design of the grievance process; e.g. people who cannot afford a mobile phone, who do not have a means of transportation to get to a suggestion box or complaints office, who cannot read or write, who cannot afford to take the time off work to meet with a company representative, etc.

Explicitly discuss the grievance process with women's groups and vulnerable people. Section 3A gives guidance on options for engaging with women in situations where there are obstacles to doing so. The more trust is built, the more honest the feedback.

Discuss with communities the steps involved in registering, responding to and investigating a grievance. Monitor the process carefully to quickly correct any inconsistencies (real or perceived). Communicate with the complainant every step of the way, so they know what to expect next. Deliver on stated commitments around response and investigation times.

Share information with external stakeholders about their rights; for example, to access state-based and non-judicial processes in addition to (or instead of) the site's grievance process.

Consider independent investigations, especially on environmental issues where external stakeholders may not trust site and/or government figures.

Provide for a multi-stakeholder Appeals Panel in the event that no mutually agreed resolution can be identified.

Explain the details of each step of the grievance process to the complainant. Include the complainant in key parts of the process, such as in investigation visits and adjudication meetings, where appropriate.
Where necessary, consider involving non-company representatives in the process (e.g., religious leaders, respected academics) to witness decisions and validate the grievance process's transparency.

There are two instances where sites should take additional considerations in the design of grievance processes: in relation to Indigenous Peoples (see Section 4I) and in relation to Land Access, Displacement and Resettlement (see Section 4F).

The operational principles and the internal procedure for managing grievances should remain the same as outlined in this section. However, sites need a dedicated engagement and design process that recognises the need for cultural appropriateness regarding Indigenous Peoples, and also the substantial and ongoing impacts on households and communities undergoing resettlement.

Efforts and steps taken to tailor the grievance process to Indigenous Peoples and individuals or communities being resettled should be outlined in the relevant management plans.

Box 3B.4 Indigenous Peoples and Land Access, Displacement and Resettlement

Rights-compatible: both the grievance process and any resulting remedy should respect the rights of all involved. Sites should:

- Undertake regular analysis of the frequency, patterns and causes of grievances to learn how site risk and impact management may be improved. Sites should:
  - Ensure that the process for identifying a solution or remedy respects the rights of the complainant, particularly in relation to participation, transparency and fairness in the grievance process.
  - Ensure that any resolution is compatible with domestic law and international standards.
  - Respect the right to privacy of complainants.
  - Establish a process for the regular analysis and evaluation of the grievance process and adjust the process according to the findings (see CHECK).

People may fear that their grievances will be met with hostility or result in reduced employment or local procurement opportunities. Sites should ensure that there is no retaliation for using the grievance process and reassure local communities that there will be no negative consequences if they submit a grievance.

Box 3B.5 Non-Retaliation
Task 3 – Develop a Learning from Incident Procedure

Contents in this section:

Task 1 – Develop a Grievance Management Procedure

Task 2 – Ensure Grievance Process follows UNGP Principles

Task 3 – Develop a Learning from Incident Procedure

Task 4 – Conduct stakeholder engagement

The Learning from Incident Group Standard and the Social Way Policy require sites to have a Learning from Incident procedure in place. The purpose of the procedure is to outline the site's approach for managing all types of incidents (i.e. those with financial, legal, reputational, social, environmental, and/or safety consequences) in accordance with the Group Standard on Learning from Incident.

The procedure should outline the roles and responsibilities and timelines with regards to incident reporting, assigning consequence levels, recording, notification, investigation using the Learning from Incidents (LFI) methodology, action planning, and close-out, all of which should be in accordance with the Group Standard on Learning from Incident.

The procedure should also outline a process to evaluate the effectiveness of the site's approach to Learning from Incident on at least an annual basis.

Investigation results should inform the grievance resolution process. Some sites may choose to integrate the site's grievance management procedure into the site's Learning from Incident procedure.
The key element that underpins the principles of the grievance process is stakeholder engagement. A grievance process that has been developed through discussions and consultation with internal stakeholders and affected communities is much more likely to be trusted and used.

Consultations with internal stakeholders help to ensure that:

- Internal roles and responsibilities in relation to the grievance process are agreed and understood.
- Potential internal barriers to having an effective process are addressed.
- Stakeholders understand what the grievance process is for (and, equally important, what it cannot address; e.g. requests for help or development projects or alleged criminal behaviour).
- Stakeholders are aware of how to access it and how it works.

A review of the grievance process should be conducted to assess how well it is understood and trusted and the extent to which it complies with the guidance set out here. Community Engagement Forums (CEFs) can also be a useful vehicle for monitoring the effectiveness of sites’ grievance processes.
Task 5 – Receiving grievances

Contents in this section:
Task 5 – Receiving grievances
Task 6 – Screen grievances
Task 7 – Log grievances
Task 8 – Respond to grievances
Task 9 – Categorise grievances
Task 10 – Assign a consequence level
Task 11 – Notify internal stakeholders
Task 12 – Investigate grievances/incidents
Task 13 – Resolve grievances and remediate harm

In developing and implementing a grievance process, sites should consider a number of different elements.

**Task 5 – Receiving grievances**

Incoming channels –

- Allow for grievances to be submitted in more than one channel, to facilitate access for all segments of the population (e.g. people who live in remote areas, who are illiterate, or who may wish to remain anonymous).
- Channels could include:
  - A telephone hotline (preferably toll-free)
  - Site staff who are designated point persons for submission of grievances in person
  - Formal or informal discussions during engagement activities (meetings, public consultations, one-on-one meetings, etc.)
  - Community letter box
  - Email, using a designated email address
  - Online or social media channels

3. ENGAGEMENT AND ANALYSIS

Do
Option to remain anonymous – Anglo American requires that there is an option to submit grievances anonymously or via third parties. This means there can be no direct follow-up with the complainant regarding the investigation and resolution of the complaint (unless and until the complainant waives his/her anonymity or this takes place via an intermediary). In every other respect, anonymous grievances should be processed in the same way.

Self-reporting of grievances – Some grievances; for example, those received during stakeholder engagement activities, may need to be self-reported by the site teams.

Anglo American operates a Group-wide whistle-blowing programme called Your Voice that provides a confidential and secure means for employees, suppliers, business partners and other stakeholders to raise concerns about breaches in company Business Principles. An external and independent service provider receives and analyses all incoming alerts from whistle-blowers. These alerts are made anonymously, then forwarded to a Response Team within Anglo American in order to ensure that the issue is further investigated and resolved.

While local stakeholders should be encouraged to use the site grievance mechanism where they feel comfortable to do so, Your Voice serves as an alternative, confidential way to lodge complaints when site grievance mechanisms have not been successful, or when grievances pertain to fundamental corporate values. Sites should ensure that the Your Voice programme is properly publicised and co-ordinated with the formal on-site mechanisms.

Box 3B.6 Your Voice whistle-blowing programme
Task 6 – Screen grievances

Contents in this section:
Task 5 – Receiving grievances
Task 6 – Screen grievances
Task 7 – Log grievances
Task 8 – Respond to grievances
Task 9 – Categorise grievances
Task 10 – Assign a consequence level
Task 11 – Notify internal stakeholders
Task 12 – Investigate grievances/incidents
Task 13 – Resolve grievances and remediate harm

All grievances should be screened to establish whether:

1. The complaint is in scope of the grievance process. Complaints unrelated to the site (e.g. poor education provision in the area) are not classified as grievances. In these cases, the grievance should be logged in the site's grievance register and closed-out by discussing verbally with the complainant and directing them to a more suitable channel, if relevant.

2. The grievance is credible. Sites should work on the assumption that every grievance is legitimate; in some cases, however, grievances are evidently false or malicious in intent (unfairly targeting an individual or department). In these cases, the grievance should be logged in the site's grievance register, and closed-out by discussing verbally with the complainant and directing them to a more suitable channel, if relevant. Grievances related to perceived impacts are credible grievances, even where the site is confident that the impact is not in fact occurring (see Box 3B.7).
Sometimes, a simple reassurance or explanation suffices to close-out a grievance. This typically happens with grievances expressed verbally in the context of a meeting. Such grievances should still be logged, categorised, rated, and closed-out, but they don't need to be responded to or investigated.

Note that if there seems to be a recurring pattern in the type of grievances resolved on the spot, it could be an indication that the site needs to improve its engagement and communication on the topic in question.
All grievances should be logged in a centralised place in the form of a register and/or online system, where information about the complaint and complainant, the date the grievance was received and closed-out, the preliminary and final consequence ratings, and other relevant information is captured. As all grievances relate to actual or potential incidents, the related (actual or potential) incident should be logged with the grievance. This can be logged as one entry in the same register or system provided that, where relevant, the incident log captures where a grievance was also raised.
Task 8 – Respond to grievances

Sites should send an acknowledgment of receipt to the complainant, including an overview of the investigation and resolution process to be followed. Sites should set clear timeframes within which the complainant can expect a proposed resolution in line with the grievance process in place, so that the complainant is assured of the predictability and transparency of the process. This timeframe needs to be practically feasible for the teams, while at the same time respecting the stakeholder’s needs and expectations. Where there is a clear sense of urgency regarding a grievance (e.g. due to public outcry or perceptions of ongoing harm), it may need to be resolved more quickly.

In instances where timeframes set in the grievance process cannot be met, an interim response should be provided, explaining what actions are being taken, that there will be a delay, the reasons for this, and the revised date for a proposed resolution.

As part of sites’ response and overview of the grievance process, complainants should be informed of alternative avenues available to them. These might be state-based (judicial or non-judicial) or non-state-based (trade unions). Allegations of a criminal nature must be referred to the relevant authority.

Table 3B.1 – Responding to grievances

<table>
<thead>
<tr>
<th>Preliminary Consequence Level</th>
<th>Complainant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level 1</td>
<td>Confirm receipt within five days</td>
</tr>
<tr>
<td></td>
<td>Initiate preliminary consultations with complainant within eight days</td>
</tr>
</tbody>
</table>

3. ENGAGEMENT AND ANALYSIS

Do
Preliminary Consequence Level

Complainant

Start investigation within 15 days

Level 2-3

Confirm receipt within 48 hours

Initiate preliminary consultations with complainant within four days

Start investigation within 10 days

Level 4-5

Confirm receipt within 24 hours

Initiate preliminary consultations with complainant within one day

Start investigation within two days
Grievances relate to actual or potential incidents. Therefore, categorising a grievance is the same as categorising the actual or potential incident associated with the grievance.

The table below provides an overview of examples of grievances and associated actual or potential incident categories. More examples are included in the Tools section (see 3B.4 Tools).

Table 3B.2 – Examples of grievances and associated incident categories

<table>
<thead>
<tr>
<th>Example of grievance</th>
<th>Example of associated (actual or potential) incident categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unfair compensation paid by site</td>
<td>Damage to houses due to fly rock, pipeline vibrations, etc.</td>
</tr>
<tr>
<td>Incident with reputational consequence</td>
<td>Incident with social consequence in case the situation impacted on livelihoods. Captured in the ‘Economic’ category</td>
</tr>
<tr>
<td>Incident with potential financial consequences in case there are indications that community could protest against the site owing to this issue</td>
<td>Incident with social consequence in case procurement procedures and/or opportunity allocation are unfair or discriminatory. Captured in the ‘Personal and Political Security’ category</td>
</tr>
<tr>
<td>Incident with reputational consequence</td>
<td></td>
</tr>
<tr>
<td>Incident with legal consequence</td>
<td></td>
</tr>
<tr>
<td>Incident with social consequence in case of impacts on community member(s) in terms of stress/mental health. Captured in the ‘Community Health and Safety’ category</td>
<td></td>
</tr>
</tbody>
</table>
Example of grievance

Example of associated (actual or potential) incident categories

- Fear of tailings dam collapse
- Speeding/reckless driving of contractor trucks in village
- Site trucks in community causing dust
- Damage to Anglo American office as a result of community violence
- Not enough jobs available at site
- Community protest against site
- Contamination of water affecting crops or animals

Incident with social consequence, resulting in impacts on housing. Captured in the 'Infrastructure and Services' category.

Incident with social consequence in case of impacts on community member(s) in terms of stress/mental health. Captured in the 'Community Health and Safety' category.

Incident with reputational consequence.

Incident with social consequence in case of impacts on community member(s) in terms of stress/mental health. Captured in the 'Community Health and Safety' category.

Potential incident with social consequence; i.e. near-miss in terms of collision with community member or community member vehicle. Captured in the 'Community Health and Safety' category.

Incident with reputational consequence.

Incident with legal consequence.

Incident with environmental consequence.

Incident with social consequence in case of impacts on community member(s) in terms of physical health. Captured in the 'Community Health and Safety' category.

Incident with financial consequence.

Incident with potential safety consequence in case Anglo American staff could have been injured.

Incident with reputational consequence.

Incident with legal consequence.

Incident with environmental consequence.

Incident with financial consequence.

Incident with social consequence, in case water contamination results in impacts on livelihoods. Captured in the 'Economic' category.

Incident with social consequence, in case perception of discharge results in impacts on stress/mental health, even in case where water may not have been contaminated. Captured in the 'Community Health and Safety' category.

Sometimes grievances are related to perceptions; e.g. the perception of the site causing air pollution, the perception of the site affecting water quality, the perception that site jobs or procurement opportunities are...
Negative perceptions about our sites can result in local opposition to our presence in an area, damage our reputation and ultimately prevent us from delivering on our business objectives. It is therefore essential that perceptions related to negative impacts and business conduct are adequately investigated using and addressed appropriately.

Depending on the local context, the incident related to grievances about negative perceptions could consist of:

- Actual stress caused to the complainant caused by the perception of breathing in polluted air, drinking contaminated water, etc. This is captured in the Social 'Community Health and Safety' category.
- Potential reputational consequences, as negative perceptions could lead to negative media coverage and wider reputational damage as a worst-case scenario.
- Potential financial consequences, as negative perceptions could lead to protests and blockades of access roads, for example.

Investigations should be used to establish what led the complainant(s) to distrust site information (such as air-quality-monitoring results) and establish effective mitigation measures to re-establish trust.

It is important to categorise a grievance/ (actual or potential) incident, as it may have various causes that relate to actions or activities being undertaken by other teams or departments on site. Categorisation is also necessary for monitoring and reporting purposes and it makes it easier for sites to identify recurring problems. The table below provides a breakdown of categories and sub-categories for incidents with social consequences.

<table>
<thead>
<tr>
<th>Categories</th>
<th>Sub-category</th>
<th>Potentially caused by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic</td>
<td>Any impact on community members related to economic livelihoods such as a loss of/reduction in/reduced access to/threats to/damage to/inadequate/lack of:</td>
<td>Impacts on economic livelihoods may be caused by the following factors: Responsibility may lie, or be shared, with:</td>
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<tr>
<td></td>
<td></td>
<td>Income Sources of livelihood</td>
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<td>Traditional livelihoods</td>
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<td>Livelihood restoration</td>
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<td>Land-based livelihoods</td>
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<td>Subsistence production-based livelihoods</td>
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<td></td>
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<td>Rivers/marine-based livelihoods</td>
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<td>Forest-based livelihoods</td>
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<td>Pasture-based livelihoods</td>
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<td></td>
<td></td>
<td>Minerals/subsoil-based livelihoods (ASM)</td>
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<td></td>
<td></td>
<td>Work</td>
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<td></td>
<td>Diversity of livelihoods</td>
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<td>Destruction of protected habitat</td>
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<td>Disturbance of plants or animals</td>
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<td>Illegal fishing or hunting</td>
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<td>Illegal removal of wood or bush clearing</td>
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<td>Reduction of access to land where mineral exploitation (ASM) is possible / legal</td>
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<td>Occurrence of exotic vegetation</td>
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<td>Setting of snares</td>
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<td>Contamination affecting crops or animals</td>
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<td>Non-payment of workers</td>
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<td>Social Performance</td>
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<td>S&amp;SD</td>
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<td>Human Resources</td>
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<td>Supply Chain</td>
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</table>

The table provides a breakdown of categories and sub-categories for incidents with social consequence.
Any impact on community members related to personal and political security, such as loss of/reduction in/reduced access to/threats to/damage to/inadequate/lack of:

- Impacts on personal and political security may be caused by the following factors:
  - Productivity of livelihoods
  - Legality of livelihoods
  - Adequate levels of income generation
  - Loans, credit, other financial support
  - Job opportunities
  - Allocation of job opportunities
  - Lack of direct local job opportunities
  - Unfair allocation of business opportunities
  - Unfair allocation of jobs
  - Construction activities
  - Resettlement-related compensation payments
  - Resettlement-related land acquisition
  - Resettlement-related replacement land
  - Resettlement-related livelihood restoration
  - Compensation payments provided
  - Site-induced migration

- Other:
  - Justice
    - Labour rights
    - Freedom from slavery, forced and child labour, debt bondage
    - Freedom from persecution, discrimination
    - Freedom from violence and conflict
    - Ability to participate in political, economic, and social systems
    - Ability to participate in company engagement and consultation
    - Fair policing and public security
    - Freedom from corruption and bribery
      - Corrupt activities by a company or contractor employee
      - Illegal conduct by company or contractor employee
      - Unethical business practices by the company
      - Unfair allocation of business opportunities
      - Non-payment of workers
      - Unfair allocation of job opportunities
      - Unfair or preferential hiring practices
      - Employee housing provided by the company
      - Confrontation or interaction with private security providers
      - Confrontation or interaction with public security providers
      - Unfair allocation of social investment projects
      - Unfair or preferential allocation of training
      - Lack of consultation or information disclosure at site
      - Lack of inclusive engagement

- Social Performance
- S&SD
- Human Resources
- Supply Chain/Procurement
<table>
<thead>
<tr>
<th>Categories</th>
<th>Sub-category</th>
<th>Potentially caused by</th>
<th>Cross-functional responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Socio-cultural networks</td>
<td>Any impact on community members related to socio-cultural networks, such as loss of/reduction in/reduced access to/threats to/damage to/inadequate/lack of:</td>
<td>Impacts on socio-cultural networks may be caused by the following factors:</td>
<td>Responsibility may lie, or be shared, with:</td>
</tr>
<tr>
<td>Infrastructure and services</td>
<td>Any impact on community members related to infrastructure and services, such as loss of/reduction in/reduced access to/threats to/damage to/inadequate/lack of functionality/affordability of/quality of:</td>
<td>Impacts on socio-cultural networks may be caused by the following factors:</td>
<td>Responsibility may lie, or be shared, with:</td>
</tr>
<tr>
<td>Cultural heritage</td>
<td>Any impact on related to tangible and/or intangible cultural heritage, such as loss of/reduction in/reduced access to/damage to/quality of:</td>
<td>Impacts on socio-cultural networks may be caused by the following factors:</td>
<td>Responsibility may lie, or be shared, with:</td>
</tr>
<tr>
<td>Other</td>
<td>Social networks and connectedness</td>
<td>Community groups</td>
<td>Ability to provide leadership</td>
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<td></td>
<td></td>
<td>Education</td>
<td>Housing</td>
</tr>
</tbody>
</table>

**Movable or immovable objects, property, sites, structures, or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values**

**Unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, springs, and waterfalls**

**Intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, cultural networks, innovations, rituals, and practices of**
<table>
<thead>
<tr>
<th>Categories</th>
<th>Sub-category</th>
<th>Potentially caused by</th>
<th>Cross-functional responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community</td>
<td>Health and Safety</td>
<td>Any impact on community members related to (physical and/or mental) health and safety, such as an increase in/incidents of:</td>
<td></td>
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<td></td>
<td></td>
<td><strong>Impacts on community health and safety</strong> may be caused by the following factors:</td>
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<td><strong>Responsibility may lie, or be shared, with:</strong></td>
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<td></td>
<td></td>
<td><strong>communities embodying traditional lifestyles</strong></td>
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<td><strong>Supply Chain/Procurement</strong></td>
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<td><strong>Communicable diseases</strong></td>
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<td><strong>Non-communicable diseases</strong></td>
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<td></td>
<td><strong>Poverty-associated diseases</strong></td>
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<td><strong>Diarrhoeal diseases</strong></td>
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<td><strong>Malnutrition</strong></td>
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<td><strong>Lifestyle-associated diseases</strong></td>
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<td><strong>Alcohol abuse</strong></td>
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<td><strong>Drug abuse</strong></td>
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<td><strong>Obesity</strong></td>
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<td><strong>Smoking</strong></td>
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<td><strong>Injuries</strong></td>
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<td><strong>Death</strong></td>
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<td><strong>Dust</strong></td>
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<td><strong>Gas emissions/particulates</strong></td>
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<td><strong>Odours</strong></td>
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<td><strong>Noise</strong></td>
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<td><strong>Vibration</strong></td>
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<td><strong>Hazardous substances</strong></td>
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<td></td>
<td><strong>Ground water pollution/contamination</strong></td>
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<td></td>
<td><strong>Surface water pollution/contamination</strong></td>
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<td></td>
<td><strong>Unsafe or unhealthy working conditions</strong></td>
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<td><strong>Site vehicles on public roads</strong></td>
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<td><strong>Site-induced in-migration</strong></td>
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<td><strong>Social Performance</strong></td>
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<td><strong>S&amp;SD</strong></td>
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<td><strong>Human Resources</strong></td>
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<td><strong>Supply Chain</strong></td>
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</tbody>
</table>
As explained previously, grievances relate to actual or potential incidents. Therefore, rating or assigning a consequence level to a grievance is the same as rating or assigning a consequence level to the actual or potential incident associated with the grievance.

Incident classification shall be conducted as per the [Learning from Incident Standard. The site’s Learning from Incident Procedure should outline the incident classification process for all incidents, i.e. those with legal, financial, reputational, safety, social, and/or environmental consequences.

When assigning a consequence level to a grievance/incident, sites should look at the actual and potential consequence levels in all categories (i.e. legal, financial, reputational, safety, social, and environment). Near-misses and threats of protests are potential incidents.

A preliminary actual and potential consequence level is assigned as part of grievance screening (see 3B.2 Task 6). A final actual and potential consequence level should be assigned upon completion of the investigation process.

When assigning consequence levels, sites should follow the same approach to the one outlined in Section 3C in terms of risk and potential impact identification and use of the Social Consequence Matrix (see 3B.4 Tools) and the Anglo American Risk Matrix; there is no need, however, to look at likelihood.
The internal notification process for grievances is the same as the internal notification process for incidents. The Standard on Learning from Incident outlines the process for internal notification for incidents.

Grievances may be an indicator of wider stakeholder concerns and may involve reputational risks or be a precursor to (or an opportunity to avoid) legal proceedings. It is therefore important that site management (and in some cases and/or Group) is notified of grievances as appropriate.

Table 3B.4 Site internal notification of grievances

<table>
<thead>
<tr>
<th>PRELIMINARY CONSEQUENCE LEVEL</th>
<th>SITE INTERNAL NOTIFICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level 1</td>
<td>Log within 48 hours</td>
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<tr>
<td></td>
<td>Notify Manager within three days</td>
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<tr>
<td></td>
<td>Notify other HoDs as relevant within five days</td>
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<tr>
<td>Level 2-3</td>
<td>Log within 24 hours</td>
</tr>
<tr>
<td></td>
<td>Notify Manager within 24 hours</td>
</tr>
<tr>
<td></td>
<td>Notify other HoDs as relevant within two days</td>
</tr>
</tbody>
</table>

3. ENGAGEMENT AND ANALYSIS

Do
* Notify (as appropriate) within three days

**Levels 4-5** Log immediately

* Notify Manager, relevant and immediately

* Notify Legal, and Group Head of within 24 hours

* GM

* SP

* HoDs

* GM

* BUs

* SP
Investigating a grievance is the same as investigating the actual or potential incident associated with the grievance. The guidance provided in this section is not stand-alone and should be read alongside the Standard on Learning from Incident.

All incidents (i.e. independent of type and consequence level) should be investigated according to the Learning from Incident Standard, which follows the Learning from Incidents process. Undertaking an investigation provides for a better understanding of the causes of unwanted events. Incident investigation is therefore an important tool to help analyse, review, refine and improve social and human rights impact and risk identification and management.

Logging incidents

All incidents should be logged, in addition to logging all grievances. (See 3B Task 7).

Self-observed incidents

Actual or potential incidents that are self-observed, i.e. that have not been brought to the site's attention via the grievance mechanism, should be categorised, a consequence level assigned, and internal stakeholders notified as per the S&SD 3. ENGAGEMENT AND ANALYSIS.
Standard on Learning from Incident and the site's Learning from Incident Procedure. For self-observed incidents, the process should be followed.

Team Composition

The required team composition by consequence level is outlined in the Learning from Incident Standard. Where multiple consequence types are involved (for example, social, environmental, reputational, and safety), and/or where an incident or grievance has non-social causes (for example, environmental, safety, or labour-related), then the team should reflect this in terms of knowledge and skills.

Involving Legal

Before starting the investigation process, sites should inform the Legal team of the grievance/(actual or potential) incident. The Legal team will assess whether there are any legal risks that should be considered and provide guidance for the investigation process.

Investigation tools

The Learning from Incident Standard lists the investigation tools that should be used, depending on the severity classification/consequence level.

Incident reporting

For all incidents, an incident report should be developed in accordance with the Learning from Incident Standard and associated templates. For actual or potential Level 4 and 5 incidents, an Alert 1, Investigation Report, and Alert 2 must be prepared and submitted according to the Learning from Incident Standard and associated templates.

Incident action plan, sharing and learning

Any specific findings from the investigation that require action must be captured in an action plan, which must be tracked at site level until completion. The site is responsible for ensuring that all actions stemming from an incident investigation are closed-out in a timely fashion.

Findings from incident investigations should be shared across the Group in order to prevent similar social incidents from occurring elsewhere in the business. The site's Social Performance business partner should be informed in order to help share the learnings, including via Global Calls to Action as appropriate.

In certain cases, sites should consider recommending an independent process that is led by a credible institution or organisation, or inviting respected individuals to participate in the investigation. This not only builds confidence but also may be the best way of getting to the facts of what occurred. Independent assessments can also be useful in dealing with technical issues, such as concerns over environmental impacts.

The decision to proceed with independent or participatory processes should be discussed at the Social Performance team's discretion.

Box 3B.9 Independent or participatory investigations
| fi | = | W | fi = W | T | z |
Task 13 – Resolve grievances and remediate harm

As far as possible, the search for a mutually satisfactory resolution to a grievance should be conducted in a spirit of cooperation and dialogue. The objective is to agree through discussion with the complainant(s) rather than through legal channels. A legalistic approach is not only difficult, expensive and time-consuming, it can also be intimidating for the complainant. Sites should consider sharing the non-sensitive parts or conclusions of the investigation report with the complainant.

Where an adverse impact has been established, sites have a responsibility to provide remediation. There are typically four types of remediation, a combination of which may be used:

- **Rehabilitation**: the complainant may need a range of rehabilitative care with independent oversight, to allow he/she to reconstruct his/her life plan or to reduce, as far as possible, the harm suffered.

- **Restoration**: restore the complainant to the original position before the incident occurred. Restoration may provide a more effective remedy than compensation.

- **Satisfaction**: satisfaction can take multiple forms, including cessation of a continued practice, changes to policies or practices, a public apology from the company, or sanctions against wrongdoers. A genuine and meaningful public apology can be a vital remedy to partly restore what cannot be compensated or restored.

- **Compensation**: when compensation is provided to the complainants, this should be fair and proportional to the gravity of the harm suffered and never offered in lieu of potential criminal liability. In cases in which an agreement is
Sign-off by complainant

- The type(s) of remediation agreed upon with the complainant should be documented and signed-off by the complainant, preferably in writing, but verbally or electronically where that is not possible.

- Implementation of remedial activities should be tracked through to completion and the effectiveness of the remediation should be reviewed after implementation.

Sign-off by management

- The action taken to resolve the grievance and/or remediate the harm should be documented and signed-off by a senior member of staff with sufficient knowledge about the topic to provide assurance that it has been adequately resolved.

- Category 1, 2 and 3 grievances/incidents should be signed off by an [HoD], although the person responsible for investigating should not be the same as the one who signs off on the resolution.

- For higher-category incidents and grievances, resolutions should be discussed at the [SPMC] and signed off by the [GM].

Sites should establish an Appeals Panel for stakeholders who are not satisfied with a proposed grievance resolution. The Appeals Panel should consist of senior managers at site or [BU] level, as well as reputable and independent external parties as appropriate.

- If the issue is particularly contentious, it may be necessary to reconstitute the panel without Anglo American representation. The site should take responsibility for driving the establishment of this panel through a process of engagement with key stakeholders, to ensure that the composition of the panel commands confidence.

- Whenever possible, stakeholders should be encouraged to refer to the Appeals Panel before resorting to legal proceedings, which can be highly confrontational, expensive, and time-consuming.

- If a site wishes to refuse an appeal (e.g. because it does not believe the grievance to be made in good faith), input should be sought from management for category 1, 2 or 3 grievances and the Group Head of Social Performance for category 4 or 5 grievances.
On a monthly basis, teams should generate a quantitative summary update, which should be consolidated into a six-month summary. It should track the indicators outlined in the table below.

Table 3B.5 Quantitative summary of grievances

<table>
<thead>
<tr>
<th>Number of grievances</th>
<th>Number and % of grievances by category</th>
<th>Number and % of grievances by consequence level</th>
<th>Number and % of grievances by status (e.g., pending acknowledgement, under investigation, closed-out, in appeals)</th>
<th>Number and % of grievances closed-out in time</th>
<th>Number and % of grievances acknowledged on time</th>
<th>Average grievance close-out time in days</th>
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</thead>
<tbody>
<tr>
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</table>

List those grievances that are proving challenging to manage

On an annual basis, sites should assess whether external stakeholders are aware of the grievance process, are able to access it, and trust it. Involving external stakeholders in evaluation of the grievance process can lead to improvements, as well as strengthening the legitimacy of the grievance process. Options for soliciting feedback include:

- Developing a short feedback form and requesting complainants complete it following the resolution of their grievance.
- Including awareness of, and trust in, the grievance process as part of perception or SMS surveys.
- Presenting a summary of numbers and types of incidents with social consequences and grievances recorded or...
submitted (and successful resolutions) at meetings (see Section 3A) and using the opportunity to encourage greater awareness of the grievance process as well as solicit feedback from participants. While individual grievances are confidential and should not be discussed in public, discuss recurring topics or trends and provide an overview of how the company is managing those issues. Depending on the structure of the CEF, consider establishing a sub- or working group dedicated to monitoring grievances and evaluating the effectiveness of the grievance process.

- Commissioning an external evaluation of the grievance process (for example, every three to five years).
The results of the monitoring and evaluation process should be used to adjust the grievance process and enhance it as required. Also important are the implications for other processes—especially stakeholder engagement, the identification of potential impacts and risks, and the design and implementation of projects. For instance, recurring grievances on similar topics may indicate the need to develop a communications strategy, to implement additional mitigation measures, or to change a current practice.
Sites are required to share the results of incident and grievance monitoring, analysis and evaluation with senior management on a regular basis, according to the existing site-group reporting schedule. Additionally, sites are required to report on the volume and nature of incidents and grievances received. Within the site team, it is helpful to develop weekly and monthly reports to submit to their BU, HoD, and BU HoD. It is then easier for the team to monitor the team's progress, and to use the data from these staff reports to generate the content of other reports up to the BU and Group.

Considerations include:
- A summary of relevant incidents and grievances should also be included in the site's Social Management Plan (SMP).
- BU SP HoD having a 'dashboard style' summary (e.g. colour-coded) for a snapshot of the current situation highlighting any support or input required from managers and other departments
- Providing comparisons with data from previous reports, or use visual elements to demonstrate any trends or fluctuations (e.g. graph)
- Monitoring reports should only include factual information (hard data)
- Analytical reports should focus on your findings and assessments of the monitoring reports, along with recommendations.

Using the grievance process as a replacement for local law enforcement and legal processes.
- The mechanism should not in any way try to duplicate or prevent access to local judicial systems.

Using the grievance process as a replacement for stakeholder engagement.
- The mechanism should not be a substitute for stakeholder engagement.

Not having consistent and objective procedures.
- The company must consider all the grievances that it receives, whether they are deemed founded or not, and regardless of the person or group making the
complaint (e.g. a complaint from a chief or government official should not carry more weight or receive privileged attention). Every complaint must undergo the same process, with the same level of transparency and commitment.

Immediately resorting to compensation or benefits to resolve a grievance.

Aim to remedy problems first before using compensation as a resolution. Example: The best resolution for damage to property caused by the company is to restore the damage, rather than to pay compensation for the damage.

Addressing symptoms rather than root causes.

Remedies should address the underlying causes of the problems raised to prevent re-occurrence.

Compensating too much, or not compensating enough. When a remedy involves compensation, it should aim to return the situation to a level equal to the previous situation (before the incident occurred). Overly generous compensation encourages opportunism, whereas inadequate compensation can appear insulting or dishonest and can damage relationships.

Depending on local customs or the hierarchical structure of local communities, some administrative or traditional authorities may expect all grievances to go through them first. If this is the case, special engagement efforts will be required to help them understand why this is not possible, without undermining their authority. Having a third-party conduit compromises some of the fundamental tenets of a good grievance process: confidential, transparent, without risk of reprisal, without potential interference by other parties/interests.

During stakeholder engagement activities, tensions may rise to the point where crowds form, and where people become verbally or physically abusive. Staff participating in the investigation could find themselves in a vulnerable position, bearing the brunt of stakeholders' frustrations and at risk of being harmed.

Work with the Security department to develop procedures for these eventualities, so that staff can recognise the warning signs of violence, know how to defuse tense situations, and have clear instructions on how to stay safe if a situation becomes dangerous.

Some complainants may be reluctant to undergo the formalities of registering a grievance when they realise that there are forms and signatures involved. Staff should take the time to explain why documentation and signatures are necessary and should offer to complete the forms with or for the complainant (particularly if the person has weak reading and writing skills). It is good practice to have identified third parties who could assist, in case the complainant does not want a staff member involved. Stakeholders should also be reminded of the option to submit a grievance anonymously.

BOX 3B. 12 Potential challenges and risks!
One senior staff member from the team should have overall responsibility for the communication, co-ordination and functioning of the grievance process, although at large sites the person may not need to be personally involved with the handling of every grievance.

Even though grievances are co-ordinated by the teams, all departments need to understand the grievance process and their role in it. Operational and technical teams should be trained in the key components, commitments and lines of communication to ensure that responsibilities are met.

Sites should ensure that enough social performance staff are trained so that they are able to conduct investigations for incidents of all consequence levels.

All site functions need to collaborate with the teams to undertake the following key activities:

### Internal lines of accountability

The table below lays out the internal roles, responsibilities and lines of accountability in relation to Social Incident and Grievance Management.

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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<tbody>
<tr>
<td>SP</td>
<td>help communicate the grievance process to the stakeholders they engage with as part of their work activities</td>
</tr>
<tr>
<td>SP</td>
<td>follow the established procedures for reporting incidents and grievances</td>
</tr>
<tr>
<td>LFI</td>
<td>participate in the investigation of incidents that relate directly to their department and their teams' activities</td>
</tr>
<tr>
<td>SP</td>
<td>participate in the resolution of grievances that relate directly to their department and their teams' activities</td>
</tr>
</tbody>
</table>

### 3B.3 Management and resources

**Contents in this section:**

- 3B.1 Introduction
- 3B.2 Guidance
- 3B.3 Management and resources
- 3B.4 Tools
ROLES AND RESPONSIBILITIES IN SOCIAL INCIDENT AND GRIEVANCE MANAGEMENT

COMPANY

LEVEL

PERSON ROLE

GROUP

Group Social Performance Principal

BUSINESS UNIT

Legal Manager

SITE

Social Performance Team

Health, Safety, Environment; Supply Chain Team

General Manager

CONTRACTOR

Provides advice and input on how to meet IFC Performance Standards and UNGPs

Makes training and knowledge about grievance management available to site teams

Receives details of incidents and grievances rated 4 and 5

Receives quarterly reporting on incidents and grievances

Notified if an actual or potential violation of law is involved

Leads on investigating non-compliance with the law

Liaises with relevant authorities in cases where legal proceedings might be, or have been, initiated

Oversees site-level process where there is a possible violation of the law

Consults external stakeholders on design of grievance process

Develops action plan for implementing the grievance process

Develops communication materials to publicise the grievance process

Raises awareness of the grievance process externally

Develops systems for centralising grievances received via other departments

Updates complainant on a regular basis

Verifies the proper application of procedures, and corrects them where necessary

Processes all incoming grievances by documenting them, tracking them, and following-up with concerned parties

Co-ordinates with relevant departments to resolve grievances

Escalates 'High' and 'Major' (levels 4 and 5) incidents and grievances to the General Manager (GM) and Group BU

Produces reports on incidents and grievances

Closure of each incident

Quarterly report (at minimum) to GM on incident monitoring and analysis findings

Submits reports to Group BU and Group SPMC

Participate in incident investigation as needed

Assume responsibility for investigation of incidents and grievances relating to their department

Discuss serious incidents and grievances at the Social Performance Management Committee (SPMC)

Assumes responsibility for the most serious cases

Receives monthly reports summarising incidents and grievances

Receives immediate notifications of 'High' and 'Major' incidents and grievances (levels 4 and 5) and reports these incidents to the CEO

Involved in resolution of serious incidents

Formally adopts the site's external grievance process
### 3B.4 Tools

#### Contents in this section:

- 3B.1 Introduction
- 3B.2 Guidance
- 3B.3 Management and resources
- 3B.4 Tools

#### Tool 1

- **Examples of grievance classification**

<table>
<thead>
<tr>
<th>Example of grievance</th>
<th>Example of associated (actual or potential) incident categories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use of force by site security forces in handling protests directed at the site</td>
<td>Incident with reputational consequence</td>
</tr>
<tr>
<td>Police harassment against individuals protesting against the site</td>
<td>Incident with social consequence in case use of force resulted in impacts on community member(s) in terms of stress/mental health. Captured in the 'Community Health and Safety' category</td>
</tr>
<tr>
<td>Insufficient compensation paid by site</td>
<td>Incident with social consequence in terms of affecting a person's right to freedom from violence and conflict. Captured in the 'Personal and Political Security' category</td>
</tr>
<tr>
<td>Unfair compensation paid by site</td>
<td>Incident with reputational consequence</td>
</tr>
<tr>
<td>Incident with reputational consequence</td>
<td>Incident with social consequence, resulting in impacts on access to financial assistance. Captured in the 'Economic' category</td>
</tr>
<tr>
<td>Incident with social consequence in case the situation impacted on livelihoods</td>
<td>Incident with reputational consequence</td>
</tr>
</tbody>
</table>
Example of grievance

Example of associated (actual or potential) incident categories

- Unfair site procurement process
- Inadequate livelihood restoration as result of economic displacement
- Inadequate housing provided as result of physical displacement
- Damage to houses owing to fly rock, pipeline vibrations, etc.
- Fear of tailings dam collapse
- Air pollution
- Speeding/reckless driving of contractor trucks in village
- Site trucks in community causing dust

Incident with potential financial consequences in case there are indications that community could protest against the site due to this issue
Incident with legal consequence
Incident with social consequence in case procurement procedures and/or opportunity allocation are unfair or discriminatory. Captured in the 'Personal and Political Security' category
Incident with reputational consequence
Incident with social consequence, resulting in impacts on livelihoods. Captured in the 'Economic' category
Incident with reputational consequence
Incident with social consequence, resulting in impacts on housing. Captured in the 'Infrastructure and Services' category
Incident with reputational consequence
Incident with legal consequence
Incident with environmental consequence
Incident with social consequence in case of impacts on community member(s) in terms of stress/mental health even in a case where air emissions are within legal limits. Captured in the 'Community Health and Safety' category
Incident with social consequence in case of impacts on community member(s) in terms of physical health. Captured in the 'Community Health and Safety' category
Incident with reputational consequence
Incident with legal consequence
Potential incident with social consequence; i.e. near-miss in terms of collision with community member or community member vehicle. Captured in the 'Community Health and Safety' category
Incident with reputational consequence
Incident with legal consequence
Example of grievance Example of associated (actual or potential) incident categories

- Lack of site training opportunities
- Damage to Anglo American office as a result of community violence
- Not enough jobs available at site
- Insufficient disclosure of information about site potential impacts
- Non-representative consultation process applied by site
- Non-accessible site external grievance mechanism
- Site does not adhere to timelines set in external grievance process
- Non-delivery of community investment projects
- Unfair allocation of local procurement opportunities

- Incident with environmental consequence
- Incident with social consequence in case of impacts on community member(s) in terms of stress/mental health, even in cases where dust emissions are within legal limits. Captured in the 'Community Health and Safety' category
- Incident with social consequence in case of impacts on community member(s) in terms of physical health. Captured in the 'Community Health and Safety' category
- Incident with reputational consequence
- Incident with potential financial consequences in case there are indications that community could protest against the site due to this issue
- Incident with reputational consequence
- Incident with social consequence as it prevents community members from participating in company engagement and consultation. Captured in the 'Personal and Political Security' category
- Incident with reputational consequence
- Incident with social consequence as it prevents community members from participating in company engagement and consultation. Captured in the 'Personal and Political Security' category
- Incident with reputational consequence
- Incident with reputational consequence
- Incident with social consequence if absence of community project impacts on community livelihoods. Captured in the 'Economic' category
- Incident with social consequence if absence of community project impacts on community infrastructure or services. Captured in the 'Infrastructure and Services' category
- Incident with reputational consequence
- Incident with social consequence in case procurement procedures and/or opportunity allocation are unfair or discriminatory. Captured in the 'Personal and Political Security' category
- Incident with social consequence in case procurement procedures and/or opportunity allocation have led to reduced
Example of grievance
Example of associated (actual or potential) incident categories

Government does not provide enough electricity
Community protest against site
Excessive working hours of subcontractor workers
Off-site collision between site vehicle and community vehicle, resulting in damage to community-member vehicle
Off-site collision between site vehicle and community vehicle, resulting in death of community member
Sub-contractor not paying wages on time
Sub-contractor using violence against its workers
Damage to protected habitat owing to site construction
Access to work. Captured in the 'Economic' category
Grievance should be screened out as it is not in scope for the external grievance process
Incident with reputational consequence
Incident with legal consequence
Incident with potential safety consequence in case Anglo American staff could have been injured
Incident with financial consequence
Incident with social consequence as it affects access to labour rights. Captured in the 'Personal and Political Security' category
Incident with reputational consequence
Incident with legal consequence
Incident with financial consequence
Incident with social consequence in terms of damage to community member asset/property. Captured in the 'Infrastructure and Services' category
Incident with reputational consequence
Incident with legal consequence
Incident with financial consequence
Incident with social consequence in case of impacts on community member(s) in terms of physical health. Captured in the 'Community Health and Safety' category
Incident with reputational consequence
Incident with legal consequence
Incident with environmental consequence
Incident with financial consequence
Incident with social consequence, in case destruction of protected habitat results in impacts on livelihoods. Captured
Example of grievance Example of associated (actual or potential) incident categories

- Contamination of water affecting crops or animals
- Discharge quality of water exceeds licence conditions
- Site using too much water, affecting community water availability
- Non-permitted bush clearing
- Crime or illegal conduct by site worker in the 'Economic' category
- Incident with reputational consequence
- Incident with legal consequence
- Incident with environmental consequence
- Incident with financial consequence
- Incident with social consequence, in case water contamination results in impacts on livelihoods. Captured in the 'Economic' category
- Incident with social consequence, in case perception of discharge results in impacts on stress/mental health, even in case water may not have been contaminated. Captured in the 'Community Health and Safety' category
- Incident with reputational consequence
- Incident with legal consequence
- Incident with environmental consequence
- Incident with financial consequence
- Incident with social consequence, in case discharge results in impacts on livelihoods. Captured in the 'Economic' category
- Incident with social consequence, in case discharge results in impacts on physical health. Captured in the 'Community Health and Safety' category
- Incident with social consequence, in case perception of discharge results in impacts on stress/mental health, even in case the discharge of water quality does not exceed license conditions. Captured in the 'Community Health and Safety' category
- Incident with reputational consequence
- Incident with legal consequence
- Incident with environmental consequence
- Incident with financial consequence
- Incident with social consequence, in case lack of water availability results in impacts on livelihoods. Captured in the 'Economic' category
- Incident with social consequence, in case lack of water availability results in impacts on physical health. Captured in the 'Community Health and Safety' category
- Incident with social consequence, in case perception of lack of community water results in impacts on stress/mental health, even in a case where the discharge of water quality does not exceed licence conditions. Captured in the 'Community Health and Safety' category
- Incident with reputational consequence
- Incident with legal consequence
- Incident with environmental consequence
- Incident with financial consequence
- Incident with social consequence, in case the bush clearing results in impacts on livelihoods. Captured in the 'Economic' category
- Incident with legal consequence
- Incident with social consequence, in case the crime is perpetrated against a community member and affects the
Example of grievance

Example of associated (actual or potential) incident categories

Unsafe worker accommodation

3B Tool 2

Sample grievance process

Community member’s livelihood assets. Captured in the ‘Economic’ category

Incident with social consequence, in case the crime is perpetrated against a community member and affects the community member’s physical security. Captured in the ‘Personal and Political Security’ category

Incident with social consequence, in case the crime is perpetrated against a community member and affects the community member’s property. Captured in the ‘Infrastructure and services’ category

Incident with social consequence, in case the crime is perpetrated against a community member and affects the community member’s physical or mental health. Captured in the ‘Community health and safety’ category

Incident with reputational consequence

Incident with safety consequence, as it affects worker safety

Incident with social consequence, as it affects labour rights

Captured in the ‘Personal and Political Security’ category

---

Grievance received (Task 5)

- Multiple channels
- Reported by stakeholder or self-reported

Screen grievance (Task 6)

- In scope and credible?

Log grievance (Task 7)

- Related incident also logged
- Capture relevant information in centralised register/database
- Categorise grievance (actual or potential) incident using Table 3B.3
- Assign preliminary actual/potential consequence rating using Social Consequence Matrix and Anglo American Risk Matrix (Task 10)

Investigate grievance/incident (Task 12)

- Investigate following S&S Integrated incident management standard, Learning From Incidents process
- Consider need for independent or participatory incident investigation
- Develop action plan for implementing findings/recommendations from the investigation

Resolve grievance and remediate harm (Task 13)

- Remediate adverse impacts
- Monitor implementation of remediation activities to completion and check effectiveness
- Sign-off on remediation by complainant
- Sign-off on action taken to remediate by management: level 1-3 by HOD / Level 4 or 5 by GM

Monitor and Evaluate (Task 14)

- Monitor grievances received on a monthly basis following Table 3B.5

Adjust (Task 15)

- Use results of monitoring and evaluation to adjust grievance process as needed

---

Respond to grievance (Task 8)

- Send acknowledgement
- Set timeframe for resolution in line with Table 3B.1

Notify internal stakeholders (Task 11)

- Notify internal stakeholders following timelines in Table 3B.4

Incident report

- Develop incident report in accordance with S&S Integrated Incident Management Standard and associated templates
- Share results across business as required

Appeals

- Appeals process triggered if grievant does not accept proposed remediation
- Option for grievant to refer grievance to Appeals Panel (see Box 3B.10)

Report (Task 16)

- Share summary of M&E results with management and stakeholders, and across business as required.
The [site] will establish and maintain a process for identifying the environmental and social risks and impacts of the [site]. The type, scale, and location of the [site] guide the scope and level of effort devoted to the risks and impacts identification process.

In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

This section provides guidance on identifying, prioritising and managing adverse social and human rights impacts and risks.

Under the Social Way, ‘impacts’ are defined as changes to the lives, livelihoods, cultural heritage, health or well-being of external stakeholders directly or indirectly caused by a site. ‘Risks’ are defined as financial, legal, or reputational threats to the business (see Box 3C.2). Risks and impacts may be related; for example: communities may block a site’s access road in response to damage to their houses due to a fly-rock from a site’s blasting. In this example, damage to the community members’ houses is an adverse impact, while lost production caused by the road blockage is a risk to the business.

Management measures and critical controls should be in place to avoid both risks and impacts where possible, and both risks and impacts should be included in the site’s Baseline Workplace Risk Assessment and Control (WRAC).

This section is aligned with both the International Finance Corporation (IFC) Performance Standards (IFC PS) and the...
United Nations Guiding Principles on Business and Human Rights (UNGPs). Every Anglo American site is required to undertake an annual baseline risk assessment in accordance with the requirements of the Anglo American Integrated Risk Management Policy and Operational Risk Standard. The assessment of Social and Human Rights Impacts and Risks (SHIRA) forms part of the (Operational Risk Management) ORM process. This requirement applies across all stages of the asset lifecycle.

Specifically, this section:

- outlines an integrated process that enables sites to identify the full range of potential adverse impacts (on external stakeholders) and risks (to the business)
- provides clarity on adopting a human rights approach to impact identification and management
- offers guidance on developing and embedding controls to prevent or mitigate potential impacts and risks
- describes the roles and responsibilities of different functions, and details the cross-departmental co-ordination and collaboration required to identify and manage potential social and human rights impacts and risks
- integrates social and human rights impacts, risks and opportunities management into the site-level Set Service Strategy, as part of the Anglo American Operating Model.

Impacts

Under the Social Way, ‘impacts’ are defined as changes to the lives, livelihoods, health or well-being of external stakeholders directly or indirectly caused by a site. Impacts can be positive or negative. *SHIRA is focused on identifying potential negative impacts.* Impacts can be cumulative. Cumulative impacts are the combined effects of multiple projects/activities in an area. *SHIRA requires sites to assess potential cumulative impacts.* Adverse impacts should be avoided.

Risks

‘Risks’ are defined as financial, legal, or reputational threats to the business. Risks can arise from impacts and site risk registers should reflect this linkage. The actualisation of a risk should be avoided.

Intended users

The intended users of this section are primarily the Social Performance teams, who have the lead responsibility for developing and for following the guidance set out in this section. However, it is a collaborative process: potential adverse social and human rights impacts can stem from a variety of sources, and multiple departments have a role to play in designing and implementing prevention and control measures. The most significant departments in this regard are typically: Human Resources, Security, Supply Chain, Legal, and Safety and Sustainable Development (S&SD).
This section also outlines an important role for Risk Managers. Risk Managers provide the link to sites’ process and have the necessary expertise to assist Social Performance teams and other departments in identifying potential social and human rights impacts and risks and in developing and monitoring (Critical) Controls.

Relevance to other sections is pivotal to Social Way implementation and supports the following sections:

ORM
SHIRA
Governance (Section 1)

Section 1 requires both resources and skills. Section 1 details the capacity and expertise that social performance teams should have and provides information on training to support skills development. Section 1 also emphasises a collaborative and cross-departmental approach to social performance, including in relation to identifying and managing potential social and human rights impacts and risks. The Social Performance Management Committee (SPMC) is designed to promote consistency and co-ordination across sites and ensure a comprehensive understanding of potential adverse social and human rights impacts and risks.

SHIRA Review and planning (Section 2):
The baseline assessment and context review outlines in this section provide the basic data and analysis essential to understanding a site’s actual and potential social and human rights impacts and risks. Further, the potential social and human rights impacts and risks captured should directly inform the site’s Social Management Plan (SMP).

SHIRA Engagement and Analysis (Section 3):
Stakeholder Engagement (3A) – stakeholder engagement is often an effective mitigation measure. Consultation also informs potential social and human rights impact identification, shapes appropriate responses and promotes trust and confidence.

Social Incident and Grievance Management (3B) – incident and grievance management provides Social Performance teams (and others) with invaluable information and insights. Grievances can be an indication of impacts and can be a useful indicator of the effectiveness of mitigation measures.

Impact and Risk Prevention and Management (Section 4)
defines the potential social and human rights impacts and risks that sites need to address. This section provides guidance on an extensive, but not exhaustive, list of impacts and management approaches commonly encountered. The assessment of potential social and human rights impacts and risks undertaken following the guidance in these sections is part of the process. The findings should be incorporated into the site’s Baseline, and issue specific management plans, as appropriate.

The mitigation of potential social and human rights impacts and risks may include the development and implementation of socio-economic development (SED) projects. Section 4 is focused on the identification of potential positive impacts a site may have on local communities, and on maximising these positive impacts through interventions (4A). While programming is not exclusively based on risk and impact mitigation, in many cases the most effective risk- and impact-mitigation measures entail long-term development support and capacity-building. Programmes should therefore be informed by an analysis of potential social and human rights impacts and risks.
Frequency and timing

Potential social and human rights impacts and risks are reviewed and updated at least annually as part of the baseline risk assessment required under [ORM], informed by the site’s internal and external context (see [WRAC] Section 2), stakeholder engagement processes (see [WRAC] Section 3A) and by its incidents and grievances (see [WRAC] Section 3B). Potential social and human rights impacts and risks form part of the site’s Baseline. Findings from issue specific assessments done under the sections on Impact and Risk Prevention and Management ([ORM] Section 4) should be incorporated into the Baseline as and when appropriate, noting that these updates may not fall within the same timeframe as the site’s annual baseline risk assessment process. The assessment or management of potential social and human rights impacts and risks may also need to be updated more frequently (as necessary) as a result of Learning from Incidents findings, significant changes to operational plans and/or external context, etc.
3. ENGAGEMENT AND ANALYSIS

3C.1 Introduction

About Social and Human Rights Impact and Risk Analysis (SHIRA)

Guiding principles

is one of the primary mechanisms in the Social Way for ensuring that sites fulfil their responsibility to prevent or manage adverse impacts on external stakeholders linked to the site.

is an integrated, comprehensive process for identifying, preventing and addressing potential negative impacts on external stakeholders, and risks to the business.

is guided by the mitigation hierarchy of avoiding, minimising, mitigating, remediating and offsetting/compensating, and by the hierarchy of controls of elimination, substitution, engineering, separation, administration, and PPE.

is underpinned by some key principles:

Stakeholder-focused – the emphasis in is on identifying and managing adverse potential social and human rights impacts on external stakeholders.

Consultative – the process is critical to the outcome. Potentially affected stakeholders should have the opportunity to inform potential impact identification and mitigation. This happens through a site's Stakeholder Engagement processes (3A) and Social Incident and Grievance Mechanisms (3B).

Inclusive – inclusion and diversity are central to both the Social Way and Anglo American's values. We recognise that certain stakeholders may experience impacts differently and more, or less, severely than others. Analyses should consider these factors when determining the consequence level of potential social and human rights impacts and risks.

Transparent and informative – sites should be as transparent as possible in relation to information-sharing, stakeholder engagement and potential social and human rights impact analysis. Transparency may be constrained by legal requirements, commercial confidentiality, or by security considerations (for example, if engaging specific stakeholders puts staff or stakeholders at risk). In general, however, a participatory and inclusive approach should be underpinned by openness. Sites cannot understand the full range of potential and actual impacts without engaging a wide spectrum of stakeholders. Similarly, those stakeholders cannot form a reasoned opinion on potential and actual impacts without an understanding of the site's activities and future plans.
The United Nations Guiding Principles on Business and Human Rights (UNGPs) shape Anglo American’s approach to human rights. The UNGPs set out core expectations for companies, including the requirement to undertake regular human rights due diligence (HRDD), in which potential positive and negative human rights impacts on stakeholders should be identified and described. The UNGPs underline that addressing adverse impacts is a company’s responsibility, not a voluntary choice.

The approach for identifying impacts can consist of a number of integrated processes including formal risk and impact assessment (social, security, environmental, political); incident and grievance management procedures; and internal and external assurance processes.

SHIRA

Cross-Functional – is not the sole responsibility of the Social Performance team. Potential impacts on external stakeholders can arise from the actions, behaviour and policies of each department and those departments are typically best placed to take ownership of the relevant controls.

SHIRA

Comprehensive and continuous – the objective is to identify all adverse potential and actual impacts on external stakeholders within a site’s Area of Influence, including those potential and actual impacts resulting from contractor activities. Impacts may emerge or evolve at any time, emphasising that is an ongoing process.

Box 3C.3 The UNGPs

The UNGPs incorporate the principles and objectives of a HRDD approach into its methodology without explicitly framing potential impacts in human rights terms. For example, an adverse impact on the health of community members as a result of excessive dust caused by site vehicles does not necessarily need to be described as an impact on the right to health. This impact on community health does, however, need to be identified and addressed.

Sites should consider whether, and to what extent, they wish to use the language of human rights in both internal analysis and external consultations. This may be context-specific. Human rights can offer a common point of reference that facilitates a shared understanding of site’s roles and responsibilities in relation to stakeholders. It can be a valuable tool in promoting greater accountability. In other contexts, the term ‘human rights’ may carry particular connotations, and the language of human rights might prove divisive or be
misunderstood. At a minimum, sites should communicate with external stakeholders in terms of actual or potential impacts, how these are being addressed and the effectiveness of controls.

While *assesses potential social and human rights impacts on external stakeholders that may be impacted by site activities, it does not replace the full HRDD process as required by the UNGPs* (see Box 3C.5).

SHIRA

HRDD is an ongoing process for identifying, preventing, mitigating and accounting for how a company addresses actual and potential human rights impacts in their own operations, their supply chain and other business relationships. HRDD is not a discreet, stand-alone exercise but incorporates a number of aspects that are integrated into wider risk management processes across relevant functions.

SHIRA

SHIRA

SHIRA

SHIRA

HRDD is an ongoing process for identifying, preventing, mitigating and accounting for how a company addresses actual and potential human rights impacts in their own operations, their supply chain and other business relationships. HRDD is not a discreet, stand-alone exercise but incorporates a number of aspects that are integrated into wider risk management processes across relevant functions.

SHIRA

SHIRA

SHIRA

SHIRA

*, which focuses on assessing and managing potential social and human rights impacts on external stakeholders (local communities and contractor workers operating at site), is one aspect of the wider HRDD process required across the business. Other functions that will have a key role in assessing and addressing potential human rights impacts include human resources (for potential impacts on direct employees) and supply chain (for potential impacts caused by suppliers e.g. poor labour conditions in a factory that supplies equipment to site). Human rights-related risks and impacts related to joint venture partners and in the context of mergers and acquisitions are managed separately through Group or the BU.

In some cases, a more in-depth, standalone human rights impact assessment may be needed. This may include, for example, where exploration activities are planned in a new high risk environment; if there have been allegations of human rights abuse against the site or site’s business partners; if there has been an increase in allegations of human rights abuses in the local environment more broadly; and where there is a significant change in site activities such as transition between phases of the asset lifecycle. In such cases, the Social Performance team should work with other functions to agree responsibilities for managing the process and actions to address findings. Any findings relevant to impacts on external stakeholders should be incorporated into /the baseline.

The state that when a business is assessing its human rights impacts it should draw on internal and/or independent human rights expertise.

Where such human rights expertise does not exist in-house, sites should involve a credible external human rights expert in the process. Involving an external human rights expert in the process may not be needed every year but should be done at regular intervals. For sites that have potentially significant adverse social and human rights impacts, either due to the nature of activities being undertaken by site or due to high levels of vulnerability in the external context, it is recommended that an external expert is involved every year. Where there have been significant changes in the internal or external context it is also recommended that an external expert be involved.

Where human rights expertise does exist in-house, sites may still choose to commission an independent human rights expert to assess potential social and human rights impacts and risks in order to strengthen credibility of the assessment findings and build trust with potentially affected communities. The potential human rights impacts and risks identified in the independent assessment must be incorporated in /the Baseline.
Lifecycle planning is a requirement at every stage of the asset lifecycle. Across the lifecycle, potential social and human rights risks and impacts are ever-changing, with some impacts specific to the point in the lifecycle.

Sites should be addressing potential impacts and risks related to social transition through operational management to avoid having any closure liabilities. Potential impacts and risks relating to social transition should be identified and assessed as part of the sites annual process, as part of the process.

Increasing levels of detail around potential impacts and risks related to social transition will need to be considered as time remaining to scheduled closure reduces. Findings from will be used to inform the Closure Risk Assessment (see MCT Tool 1) and to develop the social components of the preliminary, draft and final closure plan (see MCT Tool 2).

The actual execution of closure will be managed as a project and the risk management process will therefore follow the Anglo-American Investment Development Model requirements. A Closure Social Impact Assessment (distinct from ) must be undertaken when sites are five years from planned closure and the results of that assessment will inform the final closure plan.

Box 3C.6 Closure planning: social transition
The following provides a step-by-step guide to undertaking a Social and Human Rights Impact and Risk Analysis as part of the process. The Social Way follows the Plan Do Check Act (PDCA) management approach. For the purposes of this section, encompasses the process of developing, monitoring and updating sites' annual.

The figure below illustrates how the process follows the management approach.

ORM
PDCA SHIRA
SHIRA PDCA

3. ENGAGEMENT AND ANALYSIS
3C.2 Guidance
1. Review context
2. Understand stakeholder perspectives

3. Conduct SHIRA as part of the Operational Risk Management (ORM) process
4. Identify the category
5. Determine the scale
6. Determine site-related vulnerability
7. Determine remediability
8. Determine social consequence level
9. Assess cumulative impacts
10. Identify risks to the business
11. Determine likelihood and overall consequence level
12. Develop bowties and controls
13. Engage the Social Performance Management Committee (SPMC)
14. Integrate into management plans

15. Monitor and evaluate

16. Adjust
17. Report
The PLAN phase is focused on collecting the information necessary to develop an annual assessment of potential social and human rights impacts and risks.

Task 1 – Review context

An understanding of the context is the starting point for Task 2 – Understand stakeholder perspectives. The context review should consider the information in the existing (see Section 2), incidents that have occurred over the past year (see Section 3B), the effectiveness of existing controls, and the screening exercise (see Section 2) and the internal and external context review (see Section 2).

It should factor in any significant changes or developments over the preceding year, and anticipated ones for the following year(s).

Sites should reflect on the following issues in particular:

- Progress towards achieving long-term objectives identified in the SMP, and whether any adjustments should be made to improve progress.
- Monitoring and evaluation results of existing controls, and whether any changes should be made to increase the effectiveness of risk and impact management.
- Legal and regulatory changes relevant to social and human rights-related issues.
- Operational plans and procedures of the site. Are there any new projects or stay in business (SIB) developments?
- Which procedures have changed? Will production rates remain the same? Have new mining or surface rights been granted? Are there significant changes to operational processes?
- Evolution in political structures and dynamics. Have there been any recent political changes at national, regional or local level that are affecting, or might affect, social performance? Have elections been scheduled, is there an increase in political instability?
Socio-economic conditions. Has the economic situation improved or deteriorated over the past year? What other changes have taken place, such as demographic developments, etc.?

Market conditions related to the commodity cycle.
An analysis of impacts and risks is impossible without an understanding of the perspectives of potentially affected stakeholders. Site stakeholder engagement processes are pivotal to this, and one of the primary purposes of stakeholder engagement (see Section 3A) is to identify potential impacts and appropriate mitigation measures.

In terms of collecting information, sites can draw on three main sources:

1. Understanding external stakeholders' perceptions is an additional reason for engaging stakeholders on potential impact and risk identification. Perceived impacts should be treated as seriously as those that can be objectively verified. Perceptions influence the levels of trust and confidence in Anglo American and result in risks to the business. For example, a site may be legally compliant in terms of its emissions, but communities may still feel that their health is being negatively affected. In these cases, perceptions may be managed through proactive and ongoing engagement, sharing of site air quality monitoring data, relying on independent and/or participatory monitoring (see Sections 1 and 3A), or further lowering site emissions (where possible).

Task 2 - Understand stakeholder perspectives

- Stakeholder Engagement Plan (3A) – this contains a summary of issues raised by or discussed with external stakeholders; these issues should be categorised by groups or individuals, including those most vulnerable to potential impacts.

- Community Engagement Forum (3A) – over the course of the year, discussions at the CEF provide insights and analysis into a range of concerns held by a cross-section of stakeholders.

- Incidents and Grievance Management (3B) – a review of incidents and grievances allows sites to assess areas where concerns have been raised regarding actual or perceived impacts or ineffective mitigation measures.

3. ENGAGEMENT AND ANALYSIS Plan

Task 2 – Understand stakeholder perspectives

Contents in this section:

Task 1 – Review context
Task 2 – Understand stakeholder perspectives
Task 3 – Conduct SHIRA as part of the Operational Risk Management process

Contents in this section:

Task 3 – Conduct SHIRA as part of the Operational Risk Management process

Task 4 – Identify the category

Task 5 – Determine scale

Task 6 – Determine site-related vulnerability

Task 7 – Determine remediability

Task 8 – Determine social consequence level

Task 9 – Assess cumulative impacts

Task 10 – Identify risks to the business

Task 11 – Determine likelihood and overall consequence level

Task 12 – Develop bowties and controls

Task 13 – Engage the Social Performance Management Committee

Task 14 – Integrate into the management plans

DO

The information gathered through the PLAN phase will allow Social Performance teams to complete an assessment of potential social and human rights impacts and risks, including identification of Priority Unwanted Events (PUEs).

Task 3 – Conduct SHIRA as part of the Operational Risk Management process

Part of the process

The assessment of Social and Human Rights Impacts and Risks (SHIRA) forms part of the annual Operational Risk Management (ORM) process. Potential and actual social and human rights impacts and risks should be recorded in the Baseline. This process should be co-ordinated and facilitated by the Risk Manager and include the Social Performance team, as well as other Functions as relevant, depending on the topic.
Cross-functional responsibility

Departments should be involved in helping to identify potential adverse impacts on external stakeholders related to their Function and should contribute to the design and implementation of prevention and mitigation measures according to their areas of competence and expertise.

Table 3C.1 provides an indicative overview of the Functions potentially involved in identifying and managing impacts within that category. This provides a basis on which to ensure that consideration is given to all potential adverse impacts, to clarify roles and responsibilities, co-ordinate responses and direct the appropriate resources towards mitigation efforts.

**TABLE 3C.1 Examples of potential adverse impacts by category**

<table>
<thead>
<tr>
<th>Category</th>
<th>Definition</th>
<th>Examples of potential adverse impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic Impact</td>
<td>Impacts on economic livelihoods, which include the following elements:</td>
<td>- Fishermen unable to sustain livelihoods, owing to contamination of water sources impacting on fish</td>
</tr>
<tr>
<td></td>
<td>Sources of livelihood (e.g. land, subsistence production, rivers/marine,</td>
<td>- Resettled community unable to sustain livelihoods, due to lack of land available for farming</td>
</tr>
<tr>
<td></td>
<td>forests, pasture, minerals/subsoil, etc.); income; access to work;</td>
<td>- Human resources: Social Performance</td>
</tr>
<tr>
<td></td>
<td>Diversity of livelihoods; Productivity and legality of livelihoods;</td>
<td>- Increase in alcohol abuse, drug use, gambling, as a result of Site-Induced Migration</td>
</tr>
<tr>
<td></td>
<td>Adequate levels of income generation; loans, credit, savings or other</td>
<td>- Decrease in social cohesion, due to presence of foreign site workers</td>
</tr>
<tr>
<td></td>
<td>financial support.</td>
<td>- Lack of affordability of public services, due to increase in inflation caused by a large mining</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Lack of access to public services and infrastructure due to lack of capacity of these services and</td>
</tr>
<tr>
<td></td>
<td></td>
<td>infrastructure to absorb increase in population caused by Site-Induced Migration</td>
</tr>
</tbody>
</table>

**Socio-cultural Network Impact**

Impacts on Socio-cultural Networks, which includes the following elements: social networks and connectedness, community groups, ability to provide leadership, community trust, social cohesion, anti-social behaviour, social ills, access to knowledge and skills.

**Infrastructure and Services Impact**

Impacts on Infrastructure and Services, which include the following elements: access to, functionality and affordability of: housing; education; healthcare; transport; recreation; power; sanitation; water supply; emergency services; places of worship; telecommunications; and household goods and equipment.
**Cultural Heritage**

Impacts on Cultural Heritage, which include the following elements:

1. Tangible forms of Cultural Heritage, such as:
   - And / or
2. Intangible Cultural Heritage; i.e. traditions or living expressions inherited and passed on, such as:
   - Oral traditions;
   - Performing arts;
   - Social practices;
   - Rituals;
   - Festive events;
   - Knowledge and practices concerning nature and the universe;
   - The knowledge and skills to produce traditional crafts.

The importance of Intangible Cultural Heritage is not the cultural manifestation itself, but rather the wealth of knowledge and skills that is transmitted from one generation to the next.

**Community Health and Safety**

Impacts on the physical and/or mental health or safety of individuals, including illness, disease and injuries, and well-being.

Illness or injury may not present itself immediately. Health impacts may be related to changes in air quality, water quality, noise and vibration, etc.

Mental health is defined as a state of well-being in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community.

Mental health impacts may be related to feelings of discomfort, nuisance and/or stress.

**Application of the Social Consequence Matrix**

The Anglo American Risk Matrix includes a row called 'social/community'. To get to the consequence rating in this row, sites must use the Social Consequence Matrix to assess Scale, Vulnerability, and Remediability as these relate to potential social and human rights impacts, and then consult the Scenario Guidance to determine the Social Consequence rating. The sections below describe how the Social Consequence Matrix should be used. The Social Consequence Matrix can be found in Tools.

**Archaeological resources:**

Concentrated and patterned physical remains of past human activity. A resource may include artefacts, human, animal, plant or structural remains, and soil features.

This definition includes prehistoric and historic terrestrial and marine archaeological sites.

**Built Heritage resources:**

Above-ground, standing structures (buildings, monuments, infrastructure, etc.) or groups of structures with historical, cultural, religious, and/or artistic value to stakeholders. This includes graves.

**Living Heritage resources:**

A structure or natural landscape feature that is a part of a living cultural tradition and/or where stakeholders enact, perform, and/or practice cultural traditions and activities, including sacred groves, rocks, lakes, and waterfalls.

**Examples of potential adverse impacts**

- Loss of historic building, due to site expansion
- Damage to graves, caused by site construction activities
- Disturbance of sacred forest, caused by site traffic
- Loss of local customs and rituals, caused by Site-Induced Migration

**Social Performance**

Security

- S&SD Project and Operations teams

- Community fatalities, as a result of accidents involving site traffic on public roads

- Long-term illness, from dust or other air pollution

- Illness, from drinking from contaminated water sources

- Increase in stress levels of community members, due to fear of failure of new tailings dam facility or perceived environmental impacts
The Social Consequence Matrix breaks down potential social and human rights impacts into six categories: Economic; Personal and Political Security; Socio-Cultural Networks; Infrastructure and Services; Cultural Heritage; and Community Health and Safety. These categories allow sites to develop a comprehensive picture of the full range and type of potential social and human rights impacts on external stakeholders. Each of the six categories consists of various elements, as defined in the ‘Description’ column in ‘Scale’ in the Social Consequence Matrix and in Table 3C.1.

Sites should identify into which category the potential impact falls. Examples are provided in Table 3C.1. Note that impacts on the environment are assessed separately. Where several categories apply to one impact, the Impact Category with the highest Consequence Level should be used for analysis. Harm to external stakeholders as a result of environmental impacts should be included in the relevant category (e.g. water pollution damages economic livelihoods and/or personal health).
Task 5 – Determine scale

Contents in this section:
Task 3 – Conduct SHIRA as part of the Operational Risk Management process
Task 4 – Identify the category
Task 5 – Determine scale
Task 6 – Determine site-related vulnerability
Task 7 – Determine remediability
Task 8 – Determine social consequence level
Task 9 – Assess cumulative impacts
Task 10 – Identify risks to the business
Task 11 – Determine likelihood and overall consequence level
Task 12 – Develop bowties and controls
Task 13 – Engage the Social Performance Management Committee
Task 14 – Integrate into the management plans

The Social Consequence Matrix provides guidance for identifying the significance rating for Scale. Scale intends to capture the significance of the impact on those impacted and includes factors such as the duration of the impact and the number of people affected. The user should determine the most suitable significance rating based on their experience, knowledge and skills.
The Social Consequence Matrix provides guidance for identifying the significance rating for Vulnerability and intends to capture how vulnerable, or resilient, those impacted are in relation to the specific impact. For example, a community with high systemic vulnerability in relation to natural-resource dependence may not be vulnerable to a certain health impact. Some individuals or groups might be more vulnerable, or less resilient, to a certain impact than others. For example:

- Children are more vulnerable to health impacts because of air pollution.
- Poor households may be fully dependent on subsistence farming without access to alternative livelihoods, making them vulnerable to impacts on their land.
- Areas with poor sanitation and hygiene may be more vulnerable to communicable diseases.
- Women are more vulnerable to domestic abuse and gender-based violence.
- Women may not have equal rights in terms of land ownership and may therefore be more vulnerable in physical resettlement processes.
LGBTQ+ people may not have equal access to work because of societal discrimination. Communities, groups or individuals who may be:

- excluded or inhibited from meaningful participation in site's engagement and decision-making processes
- differently and/or more severely affected by a site's impacts
- less able to take advantage of a site's benefits

Box 3C.7 Definition of site-related vulnerability

In determining vulnerability to each potential impact, sites should use and build on the systemic vulnerability identified in Section 2. Examples are provided in table 3C.2. The 'Description' column in the Vulnerability section of the Social Consequence Matrix provides an overview of factors that may determine vulnerability for every Category.

Adverse impacts on vulnerable groups require different and/or additional controls. In terms of both prevention and mitigation of adverse impacts, sites may also need to initiate additional, targeted and long-term measures to address both the causes and consequences of vulnerability.

In the event that some people are vulnerable to the impact and others are not, sites should provide two different consequence levels and two different sets of mitigation measures (i.e. for those vulnerable to the impact, and for those not vulnerable to it).

Table 3C.2 Determining vulnerability to potential impacts

<table>
<thead>
<tr>
<th>Vulnerability</th>
<th>Potential impact related to Vulnerability</th>
<th>Potential vulnerable sub-groups</th>
<th>Potential controls for vulnerable sub-groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic</td>
<td>Land degradation as a result of environmental impacts</td>
<td>Some relatively poor households have high dependency on subsistence farming without access to alternative livelihoods</td>
<td>Restoration of land, lease of alternative land, support to establish alternative livelihoods</td>
</tr>
<tr>
<td>Political</td>
<td>Transition to construction leads to more police in the area</td>
<td>Minorities or political activists may be vulnerable to an increased public-security presence</td>
<td>Additional monitoring, regular engagement with groups/individuals, dialogue with NGOs, dialogue with security forces</td>
</tr>
<tr>
<td>Social</td>
<td>Increase in 'social ills'</td>
<td>Women and girls vulnerable to harassment and assault</td>
<td>Support for street lighting, provide night-time transport to/from site</td>
</tr>
<tr>
<td>Physical</td>
<td>Community cut off from health services</td>
<td>Elderly people without the capacity to travel long distances to alternative health services</td>
<td>Put in place alternative access, or transport provision, or support to mobile clinics</td>
</tr>
<tr>
<td>Natural</td>
<td>Increase in dust and traffic fumes</td>
<td>Children more susceptible to health impacts</td>
<td>Close monitoring of impacts. Provision of air filtering in schools</td>
</tr>
</tbody>
</table>

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The type of remedy provided should not create dependency on the site, which may be the case if monetary compensation is provided for a long period of time. Remediation that increases dependency on the site should be recorded with a higher rating.

Task 7 – Determine remediability

3. ENGAGEMENT AND ANALYSIS

Do
3. ENGAGEMENT AND ANALYSIS

Task 8 – Determine social consequence level

The significance ratings for Scale, Vulnerability, and Remediability should be used to determine the social consequence level of the actual or potential impact. The Social Consequence Matrix provides guidance to determine the overall social consequence level in the ‘Scenario Guidance’ section. Where two options are provided, it is at the discretion of the user to determine the most appropriate consequence level, based on their experience, knowledge and skills.
As part of the annual process, sites should consider cumulative impacts. Cumulative impacts are the combined (potential) impacts of multiple sites, activities, or companies in an area on a community, part of a community, or an individual, where the site has contributed to the impact. The context review should assess whether new companies or industry have moved, or are planning to move, into the area, and sites should assess whether this affects cumulative impacts.

Examples of cumulative impacts include, but are not limited to:

- **Environment** – emissions of each site or activity in relation to air, water, or noise may be within legal limits, but together they may cause significant health impacts.
- **Natural resources** – while one site or one company alone may not have a material impact on an area's natural resources, several companies active in the same area may together have impacts that go beyond acceptable limits in terms of environmental impact, impact on land availability, or human health.
- **In-migration** – in-migration into a certain area may be due to the presence of several sites or companies in the same area.
- **Traffic** – while the number of site vehicles on a public road alone may not exceed the road's capacity, in combination...
In [86x308], the potential adverse community health impact as a result of poor air quality should be assessed on the basis of overall pollution levels (which includes the site's emissions), not simply on the site's emissions alone. Cumulative impacts also exist where a community, part of a community, or an individual is potentially exposed to multiple types of site impacts at the same time. For example, the households living near a site may be exposed to noise, vibration, air quality, and traffic impacts concurrently. In these cases, stakeholder engagement with affected households and impact prevention and mitigation should be prioritised.

In [55x398], the potential adverse community health impact as a result of poor air quality should be assessed on the basis of overall pollution levels (which includes the site's emissions), not simply on the site's emissions alone. Cumulative impacts also exist where a community, part of a community, or an individual is potentially exposed to multiple types of site impacts at the same time. For example, the households living near a site may be exposed to noise, vibration, air quality, and traffic impacts concurrently. In these cases, stakeholder engagement with affected households and impact prevention and mitigation should be prioritised.
Task 10

Identify risks to the business

Contents in this section:

Task 3 – Conduct SHIRA as part of the Operational Risk Management process

Task 4 – Identify the category

Task 5 – Determine scale

Task 6 – Determine site-related vulnerability

Task 7 – Determine remediability

Task 8 – Determine social consequence level

Task 9 – Assess cumulative impacts

Task 10 – Identify risks to the business

Task 11 – Determine likelihood and overall consequence level

Task 12 – Develop bowties and controls

Task 13 – Engage the Social Performance Management Committee

Task 14 – Integrate into the management plans

In addition to determining potential impacts on external stakeholders, risks to the business should also be identified. The Anglo American Risk Matrix should be used to determine the risks to the business in terms of financial, legal, and reputational consequences. Examples of risks to the business include: a community protest with potential reputational consequences, a road blockade with potential financial consequence, and a community-initiated lawsuit against the business.

3. ENGAGEMENT AND ANALYSIS
Task 11 – Determine likelihood and overall consequence level

Contents in this section:

Task 3 – Conduct SHIRA as part of the Operational Risk Management process
Task 4 – Identify the category
Task 5 – Determine scale
Task 6 – Determine site-related vulnerability
Task 7 – Determine remediability
Task 8 – Determine social consequence level
Task 9 – Assess cumulative impacts
Task 10 – Identify risks to the business
Task 11 – Determine likelihood and overall consequence level
Task 12 – Develop bowties and controls
Task 13 – Engage the Social Performance Management Committee
Task 14 – Integrate into the management plans

Take the consequence level of the potential impacts and risks and consider the likelihood of it occurring, using the definitions for the various levels of likelihood provided in the risk matrix. Actual impacts, i.e. those currently occurring, should always be classified as 5 in the Likelihood column.

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3. ENGAGEMENT AND ANALYSIS

Do
Task 12 – Develop bowties and controls

Contents in this section:

Task 3 – Conduct SHIRA as part of the Operational Risk Management process
Task 4 – Identify the category
Task 5 – Determine scale
Task 6 – Determine site-related vulnerability
Task 7 – Determine remediability
Task 8 – Determine social consequence level
Task 9 – Assess cumulative impacts
Task 10 – Identify risks to the business
Task 11 – Determine likelihood and overall consequence level
Task 12 – Develop bowties and controls
Task 13 – Engage the Social Performance Management Committee
Task 14 – Integrate into the management plans

Controls should be developed for all (potential) impacts and risks. SHIRA follows the mitigation hierarchy of avoid, minimise, mitigate, remediate, and compensate/offset. Also follows the hierarchy of controls of elimination, substitution, engineering, separation, administration, and PPE. The prioritisation of controls should reflect these hierarchies.

The controls for potential social and human rights impacts and risks are typically cross-functional. While S&SD may be a Risk Owner, Control Owners may consist of Social Performance, Security, et cetera and vice versa.

As per the process, all risks or potential impacts assessed as High or Major in their Social Consequence level are a Priority Unwanted Event (PUE), irrespective of their likelihood. A bowtie analysis should be developed for each. Parent bowties have been developed by Group Social Performance for common and are available for sites as needed.

Sites are required to implement, at a minimum and where relevant, the Critical Controls identified in the parent bowties, and identify additional controls as relevant to the site’s context.

The process of developing controls and bowties should be led by the Risk Owner and should include all Control Owners. Clear controls should be developed, and the roles and responsibilities of different departments in control ownership, implementation, and monitoring and evaluation (see CHECK below) should be clarified.
Potential adverse impacts on vulnerable groups require specific and/or additional controls. Sites may also need to initiate additional, targeted and long-term measures to address both the causes and consequences of vulnerability. In cases where some of those impacted are vulnerable to the impact and others are not, sites should provide two different consequence levels and develop additional controls for those who are vulnerable to the impact. In order to mitigate cumulative impacts, engagement and/or partnerships with relevant external stakeholders, such as other companies or sites active in the area and/or local authorities, may be required.
Task 13 – Engage the Social Performance Management Committee

Contents in this section:

Task 3 – Conduct SHIRA as part of the Operational Risk Management process

Task 4 – Identify the category

Task 5 – Determine scale

Task 6 – Determine site-related vulnerability

Task 7 – Determine remediability

Task 8 – Determine social consequence level

Task 9 – Assess cumulative impacts

Task 10 – Identify risks to the business

Task 11 – Determine likelihood and overall consequence level

Task 12 – Develop bowties and controls

Task 13 – Engage the Social Performance Management Committee

Task 14 – Integrate into the management plans

The completed /Baseline should be presented and discussed with the . The purpose of discussing the with the is to ensure management-level awareness of , Risk Owners and Control Owners, and implementation plans.

3. ENGAGEMENT AND ANALYSIS

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Task 14 – Integrate into the management plans

Contents in this section:

Task 3 – Conduct SHIRA as part of the Operational Risk Management process

Task 4 – Identify the category

Task 5 – Determine scale

Task 6 – Determine site-related vulnerability

Task 7 – Determine remediability

Task 8 – Determine social consequence level

Task 9 – Assess cumulative impacts

Task 10 – Identify risks to the business

Task 11 – Determine likelihood and overall consequence level

Task 12 – Develop bowties and controls

Task 13 – Engage the Social Performance Management Committee

Task 14 – Integrate into the management plans

A summary of the key potential adverse social and human rights impacts and risks, and the site’s approach on how to manage these, should be included in the SHIRA.

Control Owners should ensure that the activities agreed are incorporated into departmental management and individual work plans. Security management plans, environmental management plans, and safety management plans should include -related controls as required.

SMP

SHIRA

3. ENGAGEMENT AND ANALYSIS

Do
Task 15 – Monitor and evaluate

The CHECK stage includes the development of KPIs for the Controls, review by the Management Plans.

Task 15 – Monitor and evaluate

The implementation of Controls should be monitored, and their effectiveness should be evaluated so that corrective action can be taken where needed.

To monitor and evaluate controls, appropriate key performance indicators (KPIs) should be developed, which should be recorded and tracked in the Social Way Monitoring and Evaluation Framework (Section 1).

Table 3C.3 below provides an indicative example of what might be included.

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Control</th>
<th>Target</th>
<th>Control Owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation Check</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Describe the potential impact</td>
<td>List the Controls</td>
<td>What are we trying to achieve?</td>
<td>List function responsible for the Control</td>
<td>Date the Control should start and be competed</td>
<td>Human and financial resources needed to implement the Control</td>
<td>How do we know that the controls are being implemented?</td>
<td>Outputs produced</td>
<td>Changes that have occurred as a result of Control</td>
<td>Value and success in managing the impact</td>
</tr>
<tr>
<td>Increase in number of accidents as a result of Driver safety training provided to drivers</td>
<td>Driver time spent in training</td>
<td>Training logs show that all drivers have been trained</td>
<td>X number of drivers aware of safety</td>
<td>No speeding of site traffic through villages</td>
<td>Reduction in number of traffic accidents</td>
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</table>

2.4. CHECK KPIs SPMC

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Stakeholder participation in control evaluation and participatory monitoring is crucial. Engagement should also include an evaluation of the effectiveness of controls, taking into account that certain information may be too sensitive to share externally. The extent to which affected stakeholders feel that impact management measures are both appropriate and effective is important. Stakeholder participation in evaluation should happen both informally (e.g., in the course of ongoing consultations as part of sites' stakeholder engagement processes) and formally, for example, through structured discussions at meetings (see Section 3A).

Participatory monitoring (see Section 1) is not a requirement in respect of all potential impacts. It is a requirement in certain cases; for example, with respect to impacts on Indigenous Peoples and where physical and/or economic displacement of local communities is unavoidable. It is also recommended in instances where potential impacts are likely to prove contentious with local stakeholders, or where these pertain to...
Task 16 – Adjust
Contents in this section:
Task 16 – Adjust
Task 17 – Report

The ACT phase incorporates a process of continuous improvement in response to the results of monitoring and evaluation for the effective management of potential impacts and risks, and reporting.

During the course of the year, information derived from grievances, incidents, and/or consultations with potentially affected stakeholders may prompt, where significant, an update of SHIRA. The likelihood of certain potential impacts may have increased, or the number of people affected may prove to be greater than anticipated. Additionally, new potential impacts may emerge that were not previously foreseen.

3. ENGAGEMENT AND ANALYSIS

Act
Monitoring and evaluation results and any updates to should be regularly reported internally to maintain awareness amongst senior management on the status of impact and risk management, and so that the information can inform decision making in a timely manner. Updates on should also be regularly shared with the and other stakeholders/stakeholder groups as appropriate.

SHIRA

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3. ENGAGEMENT AND ANALYSIS
### Table 3C.4 – roles and responsibilities in developing the SHIRA

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
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<tr>
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<td>GROUP</td>
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<td>Social Performance Principal</td>
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<td>Head of Corporate Affairs/ Relations</td>
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<td></td>
<td>Social Performance Manager</td>
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<tr>
<td>All Social Performance</td>
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<td>SHIRA</td>
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</table>

Provides analysis on regional and national dynamics and government relations.
Provides guidance on relevant legal and regulatory requirements and changes.
Co-ordinates and shares experience/lessons learned with other sites.
Receives regular updates on major risks through quarterly reports (at minimum).
Reviews context and highlights any relevant changes or anticipated threats (e.g. elections).
Collects inputs from other plans and processes (Stakeholder Engagement, Risk Prevention and Management Plans, Incident and Grievance Management Procedures).

3. ENGAGEMENT AND ANALYSIS
3C Social and Human Rights Impact and Risk Analysis (SHIRA)
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**ROLES AND RESPONSIBILITIES IN COMPANY LEVEL PERSON ROLE**

**SHIRA**

- Determines impacts and risks
- Analyses and prioritises impacts, risks and PUEs
- Consults with HoDs on impacts and risks
- Establishes Risk and Control Owners
- Produces consolidated and comprehensive
- Develops prevention/mitigation plans for relevant controls
- Develops bowtie analyses for relevant PUEs
- Presents to SHIRA SPMC for final sign-off
- Reviews impacts and risks with stakeholder groups (e.g. Stakeholder Engagement Forum)
- Integrates M&E of impacts and risks into associated processes (e.g. Stakeholder Engagement, Risk Prevention and Management Plans)
- Provides quarterly analytical reports of and social and human rights risks to GM HoDs
- Provides feedback to external stakeholders as required
- Facilitates and co-ordinates discussions with Social Performance team to make preliminary identification of impacts, risks and PUEs
- Provides input on operational with potential social/human rights consequences
- Facilitates discussions with relevant HoDs to ensure capture of all impacts and risks
- Supports bowtie analysis of PUEs
- Provides analysis on specific impacts and risks as relevant
- Takes ownership of Risks and/or Controls
- Develops prevention/mitigation measures for relevant impacts and risks
- Establishes KPIs
- Implements and monitors plans and tasks
- Provides quarterly updates on progress and effectiveness
- Receives monthly updates on significant-high impacts/risks

**Risk Manager**

- Staff
- SITE MANAGEMENT
- Human Resources
- Security
- Supply Chain
- S&SD
- Operations
3C.4 Tools

Contents in this section:
3C.1 Introduction
3C.2 Guidance
3C.3 Management and resources
3C.4 Tools

3C 4 Tool 1
‒ Social consequences matrix

3C 4 Tool 2
‒ Social and Human Rights Impact and Risk Analysis (SHIRA)

Coming soon

3. ENGAGEMENT AND ANALYSIS
3C Social and Human Rights Impact and Risk Analysis (SHIRA)
Anglo American seeks to make a lasting, positive contribution to the communities and regions in which we operate. A key way of achieving this is through Socio-Economic Development (SED) - supporting stakeholders to bring about sustainable improvements in their well-being at individual, household, and/or community levels. Drawing on existing models of the social and economic development needs of individuals, families and communities, 16 elements have been identified as being determinants of a “good” life. These elements can be grouped into four broad themes and, where they are lacking, improving them would make life better (Figure 4A.1 and Table 4A.3).
These elements are linked to specific goals of the Sustainable Mining Plan in regions with significant socio-economic deprivation, or as part of mine closure planning. In line with the Anglo American Sustainable Mining Plan, it is about acting as a catalyst for change in the communities and regions where we operate, in cross-sectoral, multi-organisational partnership with other stakeholders to promote larger scale, long-term development. CRD looks beyond the immediate vicinity of our sites to identify opportunities to improve the prospects of those in our host regions, independent of our presence, so the benefits will be felt long beyond the life of the mine. CRD is not a separate, standalone programme but should rather be considered a new approach to sustainable development. Over time, and the current local approach should form an integrated approach that puts initiative sustainability at the centre. Sustainable Mining Plan, which applies to all sites, is an important driver of our activities. The three Thriving Communities stretch goals in the plan – education, health and well-being, and livelihoods – will typically form the basis for the bulk of our work, although other locally-relevant initiatives will also often be necessary. Together, and play an important role in Anglo American's approach to securing socio-political acceptance and our social licence to operate. In this sense, and contribute to risk management. Strategic and effective projects are controls to manage risks to the business. Where there is a legal requirement related to , the relevant projects are controls to manage legal and compliance risks to the business. See Table 4A.1 for a more detailed overview of how fits with sites' approach. Also refer to the guidance note (see 4A.4 Tools and Guidance Notes).
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Governance (Section 1): Social Performance Management Committee (SPMC) – planning and implementation typically involves multiple departments. The provides the platform to ensure that all relevant functions are engaged on a regular basis.

Sections:

1. Review and Planning
   As part of social performance review and planning, sites are required to review and update their internal and external context review. This information is required for planning and objectives should be incorporated in the SMP.

2. Engagement and Assessment
   A. Stakeholder Engagement (3A) – consultations and collaboration with local communities and government authorities are key to successful planning and implementation.
   B. Incident and Grievance Management (3B) – grievances or incidents may be related to the planning and/or implementation of projects.
   C. Social and Human Rights Impact and Risk Analysis (SHIRA) (3C) – an project can be a control in the management of social and human rights impacts and risks to the business and should therefore be captured in the Baseline Workplace Risk Assessment and Control (WRAC).
All projects should align with the key principles outlined in Table 4A.2.

**TABLE 4A.2**

<table>
<thead>
<tr>
<th>Principle</th>
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<tbody>
<tr>
<td>Risk, opportunity and impact management</td>
</tr>
<tr>
<td>Outcome focused</td>
</tr>
<tr>
<td>Sustainable</td>
</tr>
<tr>
<td>Aligned with existing public development plans</td>
</tr>
<tr>
<td>Linked to site value chains and expertise</td>
</tr>
<tr>
<td>Participatory</td>
</tr>
<tr>
<td>Inclusive and diverse</td>
</tr>
<tr>
<td>Collaborative</td>
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</table>

**SED**

Projects need to be designed in a way to avoid creating or exacerbating stakeholder dependency on the site or the project, and in a way that ensures their impacts will outlive the direct involvement of the project.

**Aligned with existing public development plans**

Wherever possible, projects should align to already established local, regional and national public development plans to complement rather than duplicate existing efforts, to avoid positioning the site as the cornerstone in the area and to ensure sustainability.

**Linked to site value chains and expertise**

Anglo American's value chains and expertise are an opportunity to leverage a site's investment and add value. Unlocking employment and small-business opportunities at site and in local markets expands the ability to deliver opportunities for local labour and suppliers and, if planned well, drives long-term sustainability.

**Participatory Engagement**

Engagement is a critical element in the success of projects and includes involving relevant external stakeholders in the planning, design, implementation, and monitoring of projects.

**Inclusive and diverse**

The concentration of benefits from community investments among a few groups in a society can exacerbate disparity, increase vulnerability, and spark conflict. Vulnerability, diversity and inclusion issues should be considered in project selection and design to ensure that (access to) project benefits are shared broadly within communities.

**Collaborative**

Sites do not have all the necessary knowledge to design and implement projects, so collaborating with other organisations is essential. In the case of projects, collaboration is a prerequisite. It allows sites to:

- Leverage their budget through greater contribution of in-kind resources and co-funding (including government grants, loans and commercial offtake agreements)
- Tap into the knowledge and experience of other stakeholders; and
- Improve the sustainability of projects.
Lifecycle planning and implementation applies across the asset lifecycle. The scope and scale of projects should be commensurate to site risks and potential impacts and should consider available resources. SED planning must take into consideration the mine’s social-transition success criteria and post-mining land-use plan throughout operations. Activities are one of the key mechanisms for delivering social-transition success criteria such as economic diversification and reduced long-term dependency on mining. Projects must avoid creating additional dependencies on the mine and should always have a clear exit strategy. The intention is to avoid having any ongoing costs related to programming after closure. Embedding opportunities in public development planning and improving capacity of local authorities will enhance their sustainability beyond the life of mine. Collaborative Regional Development (CRD) planning applies across the whole asset lifecycle and is a key approach in helping communities and local authorities to effectively manage social transition. Taking a wider geographic view and long-term perspective, opens opportunities to foster sustainable beyond mining in partnership with other organisations. Based on a rigorous spatial analysis, allows us to identify value chains with high-impact potential in order to reduce the region’s dependency on mining. Social-transition success criteria and planning and objectives need to be aligned. Local and activities that support social transition should be included in the Mine Closure Plan. For further guidance on planning related to mine closure, please refer to the Mine Closure Toolkit and guidance note (see 4A.4 Tools and Guidance Notes).
4A.2 Guidance Overview

This section provides step-by-step guidance for planning and implementation. Anglo American's Social Way follows the Plan Do Check Act (PDCA) management process. The guidance in this section is structured accordingly. For the purposes of this section, SED encompasses the process of assessing the need for projects, gathering data to determine which elements, and consequently which projects, are most effective, developing a management plan, and monitoring and evaluating projects.

FIGURE 4A.2 THE CYCLE AS RELEVANT TO SED PDCA

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4A.2 Guidance
Task 1 – Review context

Sites should gather context-related information as part of the internal and external-context review, which is reviewed annually and updated every five years or more frequently if deemed appropriate. Table 4A.3 provides an overview of context-related information that should be collected to inform the planning and element prioritisation.

<table>
<thead>
<tr>
<th>TABLE 4A.3 context information</th>
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</thead>
<tbody>
<tr>
<td><strong>Internal-context information</strong></td>
<td><strong>External context information</strong></td>
</tr>
<tr>
<td>Site Social and Human Rights Impact and Risk Analysis (SHIRA).</td>
<td>Site social commitments.</td>
</tr>
<tr>
<td>Site social commitments.</td>
<td>Activities and plans over the Life of Asset that may pose opportunities related to.</td>
</tr>
<tr>
<td>Internal resources available for planning and implementation.</td>
<td>SED</td>
</tr>
<tr>
<td>Current local employment and local procurement data.</td>
<td>Group and level and other SED-related commitments such as the Sustainable Mining Plan (see Section 2).</td>
</tr>
<tr>
<td>An overview of local, regional and national government development plans and priorities.</td>
<td>BU SED</td>
</tr>
<tr>
<td>An assessment of the capacity and success of local authorities to achieve delivery of their mandate for service delivery.</td>
<td>A mapping of NGOs and development institutions active in the area of influence, including the outcomes they plan to achieve and the projects they are (planning on) implementing.</td>
</tr>
</tbody>
</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
Section 2 on Review and Planning includes the following information relevant for planning:

- Legal requirements for SED
- Area of Influence and Systemic vulnerability has been determined in Section 2
- Socio-economic baseline data, including baseline data for livelihoods, education, and health, has been collected as part of Section 2.
Task 2 – Conduct stakeholder engagements

Contents in this section:

Task 1 – Review context
Task 2 – Conduct stakeholder engagements
Task 3 – Prioritise SED elements of a Thriving Community
Task 4 – Develop element Statements of Work
Task 5 – Prepare project terms of reference

Inclusive engagement is a critical element in data gathering, planning, prioritisation, implementation, and monitoring and evaluation for initiatives.

Stakeholder engagement needs be conducted to: understand the development priorities of local community members, local and regional government and others; and explain the site’s prioritisation and planning process and its outcomes. Affected stakeholders should be engaged throughout the process. Affected communities should, through the Community Engagement Forum (CEF), provide input to and be involved of the eventual conclusions of the planning and prioritisation process, and then be regularly updated on the progress of project implementation and effectiveness, including evaluation findings and recommendations.

If requested by the community and not provided by the appropriate public authorities, the operating company shall provide third-party facilitation for mutually agreed upon experts to aid in the participatory process.

Some external stakeholders may try to direct benefits towards themselves or their group. In addition, formal consultations about planning and prioritisation may carry the risk that the site is not able to meet the expectations of all consulted stakeholders. Sites must take these sensitivities into account and conduct stakeholder engagement suitable to their circumstances.

Stakeholder engagement activities should be incorporated in the Stakeholder Engagement Plan (see Section 3A). Should a programme be operating in the region where the site is located, sites should engage with Group/teams to ensure alignment and consideration of opportunities identified as part of planning.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
1

<table>
<thead>
<tr>
<th>Category</th>
<th>Element</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Living conditions</td>
<td>Employment</td>
<td>Entrepreneur, job creation and employment security are the most immediate ways to reduce poverty. 'Employment' refers to all the ways that people use their time to support themselves and their households to acquire income and the skills development needed to make improvements. Work can be categorised into paid labour/jobs where an individual works for a wage, and enterprise where individuals and households sell goods and services (ranging from trading, selling value-added goods, offering services, selling surpluses from subsistence production).</td>
</tr>
<tr>
<td>Education and skills</td>
<td>Education and skills</td>
<td>Obtaining a quality education and skills underpins a range of fundamental development drivers. This element covers participation in, and effectiveness of, all levels of education (primary, secondary, tertiary, and adult), including the quality of education (teacher training), curriculum enhancement (rote vs critical thinking, science, technology, engineering, maths (STEM) courses), adult literacy, access to education, addressing barriers to student participation in education, and physical education infrastructure.</td>
</tr>
<tr>
<td>Health and well-being</td>
<td>Health and well-being</td>
<td>Good health is essential to sustainable development. Community health looks at the incidence of disease and illness (major and minor), vaccination, access to treatment, the balance between self-treatment vs traditional medicine vs Western medicine, knowledge, attitudes and practices of people regarding their health, mental health issues, and how to improve health infrastructure.</td>
</tr>
<tr>
<td>Finance</td>
<td>Finance</td>
<td>Finance covers the availability and accessibility of financial products for host communities (e.g., access to credit through micro-finance and insurance), as well as people's understanding of money and related issues, including financial literacy, personal financial management, debt and investment habits.</td>
</tr>
<tr>
<td>Food security</td>
<td>Food security</td>
<td>Access to sufficient, good-quality and nutritious food is fundamental to human existence. Secure access to food can produce wide-ranging positive impacts, including: human well-being, economic growth and job creation. Food security looks at the availability, access, utilisation and stability of food as critical precursors to.</td>
</tr>
<tr>
<td>Quality of life</td>
<td>Housing</td>
<td>Housing provides a cornerstone for household security, shelter and safety and considers factors such as: quality and affordability of materials used; construction standards; modernity of facilities (kitchens and toilets); and comforts, including people per room, climate management, and furniture and appliances.</td>
</tr>
<tr>
<td></td>
<td>Water and sanitation</td>
<td>Water scarcity, poor water quality and inadequate sanitation all have a negative effect on food security, livelihood choices and educational opportunities for poor families across the world. Similar to food security, water covers the availability, access, utilisation, and stability of water for individuals. Sanitation is closely linked to health and water and covers individual, household and public cleanliness, use of septic systems, and public and household solid-waste management.</td>
</tr>
</tbody>
</table>
local communities and/or local authorities, should be listed by element. This may include specific projects or more general commitments, for example to maximise local employment. Sites should not make voluntary-related commitments unless the element, project, or activity committed to contributes to the desired outcomes (see 4A Task 2) and long-term objectives. Existing commitments should be reviewed to ensure they contribute to the desired outcomes. Where this is not the case, sites should assess whether it is possible to discontinue the commitment and substitute it with a more effective one. Where existing commitments contribute to the desired outcomes or where discontinuation is not possible, sites must deliver on their existing commitments.

Community priorities. Sites should identify which elements are a priority for community development and why, and what the community perceptions are of the importance of the various elements. Elements that are deemed key for community development should be prioritised over other elements.

Government priorities. Sites should identify which elements are a priority in local, regional and national government development plans and describe any existing government initiatives for each element. Government capacity to support projects related to each element should be assessed. Elements that are a priority in government development plans, and elements for which government support capacity is strong, should be prioritised over other elements.

Site plans and activities. Sites should identify if there are any site plans or activities that could be used to leverage an project related to a certain element, such as shared infrastructure or local-content opportunities. Elements that include opportunities to leverage site activities should be prioritised over other elements.

Prior context and level of difficulty. Sites should consider the prior context when considering projects related to each element. This includes a review of similar projects implemented by the site or the development sector more generally as well as examples of successful projects. This allows to identify critical success factors, key risks and challenges in order to avoid similar pitfalls as well as to estimate expected value/impact.

Partnerships and collaboration. Sites should identify if there are any ongoing, development institution, and/or other company initiatives and projects related to each element in the area of influence, and list opportunities for co-funding or collaboration by element. Elements for which the potential for co-funding and effective partnerships is high should be prioritised over other elements.

Cost and timelines. Sites should assess, at a high level, the anticipated budget and estimated timelines needed to make a positive impact in relation to each element. Elements that do not require a disproportionate share of the budget are able to positively impact a large number of people and do not require long timelines to show first impact should generally be prioritised over other elements. However, this might not apply to CRD-led projects that normally take longer to implement.

Unintended consequences. Sites should assess whether there could be any unintended consequences associated with each element. This includes considerations about dependency (i.e. whether a focus on this element is likely to increase dependency on the site) and corruption (i.e. whether activities within this element are particularly susceptible to corruption). Elements with no associated unintended consequences should be prioritised over other elements.

Vulnerability, inclusion and diversity. Sites should assess issues related to vulnerability, inclusion and diversity for each element. Will focus on a certain element disproportionately benefit a certain population group? Will vulnerable people be able to access benefits? Elements that do not disproportionately benefit certain population groups and that benefit vulnerable people should be prioritised over other elements.
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fi ____________________

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• A A kf
  kf
• A
• kf
  kf
A
• A
• A
• A kf
• A
<table>
<thead>
<tr>
<th>TABLE 4A.5 Delivery mechanisms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local procurement (LP)</td>
</tr>
<tr>
<td>Foster local economic activity and job creation by leveraging the site's supply chain and procuring locally. Local procurement requires significant participation of Supply Chain and contractor management in order to unlock opportunities and promote access for local suppliers (unbundling contracts, simplifying tendering, etc.).</td>
</tr>
<tr>
<td>Enterprise and supplier development (ED)</td>
</tr>
<tr>
<td>Support capacity building in local entrepreneurs by providing these enterprises with support to address issues around access to knowledge, skills, markets and capital in order to foster job creation, diversify the local economy and balance the effect of local procurement, reducing dependence on the mine.</td>
</tr>
<tr>
<td>Local employment / Skills development (LE/SkD)</td>
</tr>
<tr>
<td>Build capacity in local communities to access job opportunities not only at Anglo American but also in other organisations (public and private sector). Local employment requires significant participation of Human Resources in order to unlock opportunities and promote access for local labour.</td>
</tr>
<tr>
<td>External capacity development (ECD)</td>
</tr>
<tr>
<td>Develop skills of local public institutions (e.g. through training, mentoring, technical assistance, participatory planning), seeking to strengthen them to fulfil their role more effectively and reduce pressure on Anglo American to deliver public services, as well as projects to build the capacity of local stakeholders to hold local institutions to account.</td>
</tr>
<tr>
<td>Employee volunteering (EV)</td>
</tr>
<tr>
<td>Leverage the skills of Anglo American's employees to support capacity building in community organisations and other participation opportunities across the site's portfolio – e.g. Ambassadors for Good Programme, Platinum for Good.</td>
</tr>
<tr>
<td>Synergies with infrastructure (SwI)</td>
</tr>
<tr>
<td>Design projects so that asset infrastructure (e.g. water, power, roads) provides development benefits in host communities and improves access to social infrastructure. Includes leveraging opportunities around infrastructure maintenance activity to support local infrastructure development and supporting community/government-led infrastructure projects.</td>
</tr>
<tr>
<td>Corporate social investment (CSI)</td>
</tr>
<tr>
<td>Invest in strategic outcomes not achievable through mining value-chain-based approaches, focused on the more vulnerable and those with reduced or no access to opportunities from core activities. Community building activity (community small grants projects, self-help groups, community-based savings groups, and known sources of external funding.</td>
</tr>
</tbody>
</table>

**SED**: An approach for exit and sustainability strategies to avoid creating dependency on the site. Indicative resourcing needs, including budget, staffing, and collaborations.
Task 5 – Prepare project terms of reference

Once SoWs are developed for priority elements, sites should identify and design a portfolio of projects that together contribute to the desired outcomes for each priority element. Sites should identify projects that:

- can be implemented in partnership with other organisations and/or that can be co-funded by other organisations (see Box 4A.3).
- are feasible to plan and implement;
- are aligned with the LoAP;
- do not increase dependency on the site;
- have a clear exit strategy;
- are cost-effective;
- are inclusive and accessible to vulnerable people;
- do not have unintended consequences.

Partnerships can have several benefits, including:

- providing diverse perspectives and insights;
- providing expertise, skills and solutions not available at site-level;
- enhancing the scale and reach of interventions;
- leveraging resources and expertise from other organisations.

Box 4A.3 Collaboration and partnerships
While partnerships provide many benefits, they can also be challenging. Organisations may have different mindsets and ways of working. Partnerships therefore require patience, understanding, mutual respect, and, above all, shared objectives. Once objectives have been defined, potential partners with similar objectives can be identified.

A range of partnership options is available to sites to support planning and implementation of projects. Sites should first consider whether collaboration is necessary and which options (organisation or individual/partnership or service provider) are best suited to their context and requirements for planning and implementation. Partnerships can range from more transactional ones, which are only short-term in nature and focus on executing pre-determined plans, to strategic ones, which are long-term and constitute an ongoing and strategic collaboration, with proactive engagement among partners.

Collaboration may be needed for various tasks in planning and implementation, such as:

- External-context review in relation to, including the identification of challenges and opportunities related to each element.
- Developing a theory of change and monitoring and evaluation framework at the element and project level.
- Conducting a detailed study of an element.
- Drafting a SoW or ToR.
- Implementing projects.
- Co-funding of projects.

For each project a Terms of Reference (ToR) should be developed. The ToR is the key reference document for designing, contracting, and implementing a project and should include:

- The specific problem the project is trying to address.
- A mapping of desired outputs and outcomes at the project level, including, where possible, the anticipated Social Return on Investment SROI (see 4A.4 Tools and Guidance Notes and 4A.2 Task 7), and in all cases, the Theory of Change (see Tools and Guidance Notes).
- How the project delivers on the commitment, legal or permitting requirement, or control objective.
- Activities and timelines of each activity.
- Project beneficiaries, including vulnerable groups.
- Delivery mechanism of the project.
- Outline of project-critical success factors, risks and mitigation factors, and assumptions.
The project ToR should be used to procure an organisation to implement the project, where necessary. The team should actively participate in the procurement process, from developing the tender documents, developing shortlists for implementers, reviewing and scoring proposals, and interviewing prospective implementers. In addition to procuring an implementing party based on a completed project design, tenders can also be used as a competition to see who brings the most suitable solution to the problem as well as a means to gather additional expert advice on effective intervention solutions. See Figure 4A.3 below for a process overview from element prioritisation to SoWs and project ToRs.

For projects where the annual budget exceeds $500,000, or where the total budget for the project exceeds $1 million, engagement and approval need to be sought from the Group Head of Responsible Business Partnerships. A summary of the Tasks 3 to 5 is shown in Figure 4A.3.
Task 6 – Develop SED Plan

Contents in this section:

Task 6 – Develop SED Plan
Task 7 – Update SHIRA

This section is focused on updating (see Section 3C) and developing an SED Plan.

Task 6 – Develop Plan

All sites need to develop an SED Plan. A stand-alone SED Plan ensures continued focus on SED and allows for a comprehensive and holistic overview of the strategic approach to SED, including prioritisation, planning, and implementation.

The SED Plan outlines the strategic approach to SED and should include:

- A description of the priority elements and why these were selected as priority elements (see 4A.2 Task 3).
- The SoWs for each priority element (see 4A.2 Task 4).
- A description of how the SoWs and the desired outcomes contribute to meeting the drivers of SED (i.e. legal and regulatory requirements, social and human rights impact and risk management, commitments, etc.).
- An outline of the project portfolio (see 4A.2 Task 5), including sequencing of projects over time.
- An overview of stakeholder engagement activities for engagement on element prioritisation and design and implementation of projects.
- A monitoring and evaluation framework for the SED Plan (see 4A.2 Task 8).
- The budget and human resources requirements for implementation of the SED Plan, including financial and in-kind contributions from partners.
- An annual Implementation Plan, which outlines the SED-related activities to be conducted for the year ahead and should include:
The Plan should be discussed with the and updated every year based on monitoring and evaluation results (see 4A.2 Task 8). The results of the five-yearly update/refresh of internal and external-context information may require a more thorough update of the Plan, as needed.

Sites must integrate the priorities, approach, and annual implementation plan into the SMP, as indicated in Section 2 on Review and Planning. Note that long-term social performance objectives may be related to . Sites may choose to include the Plan as an Annex to the SMP.

- Strategic priorities for the year.
- List of projects to be designed, tendered, implemented and/or closed.
- SED
- For each project, include: the activities to be conducted for the year ahead in a schedule format, objectives for the year, key milestones and target dates, roles and responsibilities, estimated budget, and monitoring and evaluation activities.
- SED
- Staffing requirements and staff training for the year ahead.
- SED
- SPMC
- SED
- SED
- SED
- SED
The planning and prioritisation process may result in a different understanding of effective risk and impact management and controls, and vice versa. Sites should ensure that risk-related controls for risk and impact management are aligned with projects and the Plan (see 4A.2 Task 7).
Task 8 – Monitor and evaluate

Contents in this section:

A monitoring and evaluation framework should be developed to track the effectiveness of each project and the plan in total.

Guidance on monitoring and evaluation (M&E) is included in Section 1. An example of monitoring is included in Table 4A.7.

Long-term objectives identified as part of Review and Planning (see Section 2) relate to . A monitoring and evaluation framework should be developed to track progress against these long-term objectives.

At the project level, M&E should be applied to assess if the project is achieving the results as planned and is effective in achieving the expected outcomes and positive impacts.

The project ToR should include the M&E framework, defining clearly:

- Objectives of the project.
- Input targets/indicators: resources expected to be needed, including time, people, finances, information, expertise to deliver activities.
- Output targets/indicators: direct, measurable results derived from activities, which can be quantitative or qualitative.
- Outcome targets/indicators: observable changes that have occurred and can be directly linked to the project.
- Impact targets/indicators: estimated longer-term effects of outcomes on households, communities and society which the project helped bring about but are the result of a combination of factors, which cannot be directly influenced.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Check
Monitoring is an ongoing activity that should be incorporated into everyday project work, which also means that it should be resourced for. Indicators are regularly monitored to assess whether the project is implemented according to plan in order to help the project manager quickly identify and solve any issues. Participatory monitoring is not a mandatory requirement in relation to . However, it is good practice and recommended where community trust in the site is low. This is especially valuable given the collaborative approach required to address -related issues. More information about participatory monitoring is included in Governance (see Section 1).

Regular reports summarising the monitoring results for all projects should be shared with Group to enable the business to have an overview of projects by element, and to enable support to be provided for projects early on in case of problems.

Evaluation, in contrast to monitoring, should take place at specific times during the project. Baseline research should take place prior or near the start of an project to obtain information that allows to define meaningful indicators and targets against which changes, over time, can be tracked and compared. Further evaluations are usually made at intervals of between two and three years and at the end of the project. Evaluation can be conducted by the site or by, or in collaboration with, external, independent parties, which may be seen as more objective and hence credible. In order to assess the efficiency and effectiveness of flagship projects and larger expenditures, the Social Return on Investment (SROI) approach can be considered. is an outcomes-based measurement tool that helps understand and quantify the social, environmental and economic value of projects. Developed from traditional cost-benefit analysis, is a participative approach that allows to monetise outcomes and impacts so that they can be weighed against project costs. can also be used upfront for developing projects by supporting decision-making. See the Tool for more information (see 4A.4 Tools and Guidance Notes).

Multi-year and projects should include a mid-term and end-of-project evaluation led by Group/. For projects that are multi-year or multi-phase, and have a budget exceeding a certain size an external evaluation should be undertaken. Table 4A.6 gives further guidance on this.

<table>
<thead>
<tr>
<th>Required evaluation type for projects*</th>
<th>Total project cost</th>
<th>Project cost per annum</th>
<th>Project duration</th>
<th>Level of risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>External evaluation (interim and end-of-project)</td>
<td>$1.5M</td>
<td>$1M</td>
<td>&gt; 24 months</td>
<td>&gt;10</td>
</tr>
<tr>
<td>Interim and end-of-project evaluation</td>
<td>$500k – $1.5M</td>
<td>$500 and &lt; $1M</td>
<td>&gt; 24 months</td>
<td>&gt;10</td>
</tr>
<tr>
<td>End of project evaluation only</td>
<td>$250k – $500k</td>
<td>$250 – $500k</td>
<td>&gt; 12 and &lt; 24 months</td>
<td>&gt;6</td>
</tr>
<tr>
<td>No evaluation</td>
<td>&lt; $250k</td>
<td>&lt;12 months</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
the delivery mechanism was effective; there were any unintended effects; the theory of change was accurate; resources allocated were sufficient; the monitoring and evaluation process, including data collection, was efficient.

**TABLE 4A.7**

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Controls</th>
<th>Objective</th>
<th>Control</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increased income generation in the area of influence</td>
<td>Training for local businesses on participating in local procurement opportunities</td>
<td>Increased local procurement</td>
<td>Supply Chain Start date, end date</td>
<td>$ to fund venue hire, transport, logistics and training-material development</td>
<td>1 FTE dedicated to implementing the project for 1 year</td>
<td>Training logs show attendance of local business</td>
<td>80% of participants indicate they have achieved the learning objectives of the training</td>
<td>30 stakeholders use the skills they gained to register their business with supply chain</td>
<td>Increasing percentage of local procurement delivered to local businesses</td>
</tr>
</tbody>
</table>
The ACT phase incorporates corrective action, which should be taken based on M&E results, as needed.

Task 9 – Adjust

The results of M&E should inform any adjustments that need to be made at the project level and/or at the element level, including to the Theory of Change, the SoW, and the portfolio of projects. Changing the related controls in (see Section 3C) may also be necessary.

With proper consideration of the context within which projects are initiated, and of how to sustain a project, changes to ongoing projects should be rare. However, monitoring and evaluation may show that certain ongoing projects no longer align with, fit within, or sufficiently contribute to priorities and desired outcomes. In such cases, sites should assess whether adjustments to the project can be made to improve alignment. Where this is not possible, sites should assess whether it is possible to close the project without damaging key stakeholder relations and/or expectations, or creating other risks. Such actions should involve consultations with the intended beneficiaries of the project. In the case of participatory monitoring, relevant external stakeholders will have been involved in the assessment process from the beginning, and might be more open to changes to the project. Where close-out is not possible, sites should document this, continue with the project as planned, and clarify the approach taken to the (see Section 3A)

Box 4A.4 - Changing ongoing SED projects

; - A W

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Act


Task 10 – Report

Contents in this section:
Task 9 – Adjust
Task 10 – Report

Results of monitoring and evaluating and any adjustments made to activities should be regularly reported to internal and external stakeholders through the (see Section 1) and or equivalent structures as appropriate.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Act
4A.3 Management and resources

Contents in this section:

4A.1 Introduction

4A.2 Guidance

4A.3 Management and resources

4A.4 Tools and Guidance Notes

Internal lines of accountability

Table 4A.8 lays out typical internal roles and responsibilities in managing. Ideally, each site should assign one individual responsible for coordinating and managing. This individual will need to work closely with other departments at site level as well as with the Site Social Performance team to ensure a fully regional approach.

TABLE 4A.8 Internal roles and responsibilities in managing

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business unit Head of corporate Affairs/ Relations</td>
<td></td>
</tr>
<tr>
<td>Site Social performance team</td>
<td></td>
</tr>
<tr>
<td>Social Performance team</td>
<td></td>
</tr>
</tbody>
</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4A Socio-Economic Development (SED)
<table>
<thead>
<tr>
<th><strong>Company level Role Responsibilities</strong></th>
<th><strong>Related departments</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>General Manager (GM)</td>
<td>Mine planning, Human Resources, Procurement</td>
</tr>
<tr>
<td></td>
<td>Risk manager</td>
</tr>
<tr>
<td></td>
<td>Manages drafting of Plan and SoW.</td>
</tr>
<tr>
<td></td>
<td>Develops monitoring framework and evaluation plan.</td>
</tr>
<tr>
<td></td>
<td>Provides quarterly analytical reports of Plan implementation progress to SED, heads of department (HoDs) at SPMC.</td>
</tr>
<tr>
<td></td>
<td>Provides feedback to external stakeholders as required.</td>
</tr>
<tr>
<td></td>
<td>Signs-off the site-specific elements of the Plan, aligned with the Social Management Plan (SMP) (see Section 2).</td>
</tr>
<tr>
<td></td>
<td>Receives quarterly updates on implementation monitoring.</td>
</tr>
<tr>
<td></td>
<td>Receives mid-term and final Plan evaluation reports.</td>
</tr>
<tr>
<td></td>
<td>Provides information for Knowledge Review related to upcoming activities at site.</td>
</tr>
<tr>
<td></td>
<td>Provides information on the estimated life of the asset (LoA) and technological changes and implications over time.</td>
</tr>
<tr>
<td></td>
<td>Provides information for Knowledge Review related to human resources needs.</td>
</tr>
<tr>
<td></td>
<td>Supports development of SoW and Theory of Change for employment-related elements.</td>
</tr>
<tr>
<td></td>
<td>Provides information for Knowledge Review related to site impacts and risks.</td>
</tr>
<tr>
<td></td>
<td>Supports risk analysis and mitigation for Scopes of Work.</td>
</tr>
</tbody>
</table>
4A.4 Tools and Guidance Notes

Contents in this section:

4A.1 Introduction
4A.2 Guidance
4A.3 Management and resources
4A.4 Tools and Guidance Notes

Tools

4A Tool 1 – Element Priority Setting Matrix and Template
Download full PDF
Download full Excel

4A Tool 2 – Theory of Change (ToC)
Coming soon

4A Tool 3 – Social Return on Investment (SROI)
Coming soon

Guidance Notes

4A Guidance Note 1 – Collaborative Regional Development (CRD)
Coming soon

4A Guidance Note 2 – Scope of Work (SoW)
Coming soon

4A Guidance Note 3 – elements

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4A Socio-Economic Development (SED)
Guidance Note 3.1a: Enterprise development
Guidance Note 3.1b: Local procurement
Guidance Note 3.1c: Workforce development
Guidance Note 3.2: Education and skills
Guidance Note 3.3: Health and well-being
Guidance Note 3.4: Finance
Guidance Note 3.5: Food security
Guidance Note 3.6: Housing
Guidance Note 3.7: Water and sanitation
Guidance Note 3.8: Energy
Guidance Note 3.9: Connectivity
Coming soon
Guidance Note 3.10: Environment
Coming soon
Social cohesion
Guidance Note 3.11: Support networks
Coming soon
Guidance Note 3.12: Safety and security
Coming soon
Guidance Note 3.13: Community and citizenship
Coming soon
Civic Engagement
Guidance Note 3.14: Transparency & rule of law
Coming soon
Guidance Note 3.15: Institutional capacity development
Coming soon
Guidance Note 3.16: Participation and engagement
Coming soon
4B Contractor Social Management

This section provides guidance for sites about contractor social management. There are a number of potential benefits associated with contractor activities, including opportunities for local employment, increased skills and training opportunities, an increased demand for goods and services and associated indirect local employment and economic opportunities.

However, if not well managed, contractor activities can have negative impacts and damage Anglo American’s relationships with local communities and other stakeholders. Anglo American remains ultimately responsible for ensuring that our social performance objectives and requirements are met — even though contractors undertake a significant portion of the work at our sites. Anglo American therefore recognises its obligation to ensure that contractor social performance is managed professionally.

Specifically, this section will:

1. Help sites determine whether a contract is socially material or not.
2. Outline the social performance aspects of the Anglo American process for contractor management as described in the Group Contractor Performance Management Standard.
3. Detail the potential impacts and risks associated with contractor management in relation to social performance.
4. Opportunities for benefit creation through contractor activities also exist and are addressed and further explained in Section 4A on Socio-Economic Development Planning.
5. Provide guidance on including social performance issues in planning, sourcing, contracting, mobilising, managing, monitoring and closing-out of contracts.
6. List the cross-departmental roles and responsibilities involved in contractor social management.
contractors; and that Anglo American should ensure that contractors have the required knowledge, skills, and training to implement their scope of work.

In addition, the Performance Standards require Anglo American to conduct due diligence of our contractors in relation to certain human rights and labour-related issues such as debt bondage, human trafficking, forced and child labour, and ensure that our contractors comply with minimum wage, hours of work, overtime payments, occupational health and safety conditions and other legally mandated employment terms.

The provides guidance on contractor social management in its good-practice note "Managing Contractors' Environmental and Social Performance."

Intended users Various departments are responsible for different parts of the contractor social management process (plan, source, contract, mobilise, manage, close – as outlined in the Group Contractor Performance Management Standard), depending on the scope of the contract. The intended users of this section are therefore the departments of Social Performance, Supply Chain, Human Resources, Security, Safety and Sustainable Development (S&SD), Legal and the designated Anglo American contractor representative.

Relevance to other sections Contractor social management involves several of the guidance sections in the Social Way Toolkit. IFC Governance (Section 1) Social Performance Management Committee (SPMC) – depending on the scope of the contract, contractor social management may require the involvement of multiple departments. The provides the mechanism to ensure that all relevant functions are engaged in tender evaluations, developing contractor social management plans and monitoring. SPMC Review and Planning (Section 2) Where contractor social management has been identified as a risk, mitigation measures should be summarised in the Social Management Plan (SMP). The site's will also be used to inform the Contractor Social Management Plan (CSMP) and any controls or actions the contractor should implement to avoid, mitigate, or manage potential social risks and impacts in relation to its scope of work.

Engagement and Analysis (Section 3) A. Stakeholder Engagement (3A) – the way in which contractors interact with external stakeholders can have significant impacts on Anglo American's reputation. Sites typically impose requirements or restrictions on contractors for engagement and communication with communities, government entities, NGOs and media on a site's behalf.

B. Incident and Grievance Management (3B) – contractors are required to participate in Anglo American's social incident and grievance investigation process as and when deemed necessary. It is important that contractor workers have access to a worker grievance mechanism, and that any external grievances related to contractor activities are properly investigated and closed-out. Grievances and incidents also provide information about contractor social performance.
C. Social and Human Rights Impact and Risk Analysis (SHIRA) – the Social and Human Rights Risk and Impact Analysis (SHIRA) identifies potential social and human rights impacts and risks at site level. These may be relevant to a certain contractor's scope of work, in which case the contractor's requirements for social performance should include relevant controls from the SHIRA. The SHIRA also assesses the potential risks related to contractor management.

A. Socio-Economic Development (4A) – Local procurement and supplier development forms part of the Socio-Economic Development section.

C. Community Health and Safety (4C) – certain contractor activities can have a negative impact on community health and safety. It is important to clearly outline the controls and requirements contractors should implement and adhere to, in order to prevent or minimise these negative impacts. Depending on the scope of work, the contractor may be required to develop an emergency response plan that includes references to external stakeholders who may be impacted, including vulnerable groups. Contractors should be aware of Emergency Preparedness and Response Plans and should be involved in the development of such plans as appropriate.

E. Security Management and the Voluntary Principles on Security and Human Rights (VPSHRs) (4E) – Anglo American's commitment to the Voluntary Principles on Security and Human Rights (VPSHRs) has implications for the selection process, training and required contractual language in relation to private security contractors.

G. Site-Induced Migration (4G) – Depending on the scope of work and number of workers, certain contracts can impact on influx, particularly the Engineering, Procurement and Construction Management (EPCM) contractor. It is important to clearly outline the controls and requirements contractors should implement and adhere to, in order to prevent or minimise any negative impacts.

H. Cultural Heritage (4H) – Depending on the scope of work, contractors may need to be aware of the site's Chance-Find Procedure and other cultural heritage issues.
Contractor activities can have negative impacts on and damage Anglo American’s relationship with local communities and other stakeholders. This section focuses on the identification of such potential social and human rights impacts and risks, and actions to be taken within the contractor management process to prevent, mitigate and manage these.

Opportunities for benefit creation through contractor activities also exist, which is further explained in Section 4A on Socio-Economic Development.

The guidance provided in this section applies to complex contracts, such as those for EPCMs, and to more straightforward scopes of work, such as for transportation contractors. The key principle underpinning the approach to contractor social management is to ensure that it is commensurate with the level of potential social and human rights impacts and risks (and opportunities) that relate to a contractor’s activities.

Once it is determined that a contract is socially material, the potential social and human rights impacts and risks associated with the contract need to be assessed so that appropriate controls and other requirements can be established. It is essential that the tender documentation provides sufficiently detailed information about potential social and human rights impacts and risks, required controls, applicable standards and other requirements specific to the scope of work. This information must also be reflected in the contract. The social performance component of the contractor’s proposal should be appropriately weighted and evaluated. Social requirements must be reflected in the contract and the contractor should not be allowed to commence work until all required plans, processes and procedures are developed and signed off. Where potential social and human rights impacts and risks are significant, a Contractor Social Management Plan (CSMP) should form part of the Contractor Management Plan (CMP). Contractor social management does not stop once the contractor mobilises to site: regular reporting, monitoring, and audits must be conducted to ensure that the contractor implements the contract (and, as applicable), as agreed, and to ensure that potential social and human rights impacts and risks are adequately managed.

Definitions

Contractor: An individual, a company or other legal entity with a formal supply chain or temporary employment services contract to do a specific job or to provide a specific service. The term contractor includes mining and non-mining contractors. This category includes any sub-contractors who are included as any part of these contractual arrangements. The term contractor also includes bidders; i.e. an individual, a company or other legal entity without a formal supply chain contract or temporary employment services contract.
or temporary employment services contract to do a specific job or to provide a specific service, but which is trying to obtain such contract by going through a tender process.

Mining contractor:
A contractor whose work with Anglo American is directly associated with the core processes of the mine and/or plant, and includes contractors involved in mining extraction, handling/beneficiation, processing, engineering, maintenance and maintenance support, mining rehabilitation, gas drainage (ongoing mine operations) and roles that touch product through the midstream and downstream value chain areas of the business. This includes those contractors where Anglo American has outsourced a mining activity to the contractor.

Non-mining contractor:
A contractor whose work with Anglo American is in a non-mining capacity; i.e. not directly associated with the core processes of the mine and/or plant.

Sub-contractor:
An individual, a company or other legal entity contracted by a contractor to conduct (a portion of) the specific job or to provide (a portion of) a specific service as part of the contractor's work with Anglo American.

Supplier:
See contractor.

Vendor:
See contractor.

Bidder:
See contractor.

Lifecycle planning
Across the lifecycle of the asset, consideration needs to be given to how contractor-related impacts and risks are assessed, mitigated, managed and monitored. Even though, typically, there are few contractor workers involved in exploration drilling, the way such contractors interact with and behave around local stakeholders is crucial for Anglo American's relationship and reputation with local communities. The same is true for the Environmental and Social Impact Assessment (ESIA) contractor, who engages with local communities, NGO and local governments to collect baseline data, assess potential impacts and design appropriate mitigation measures.

The highest volume of (contractor) employment occurs during the construction phase, during which the contractor workforce can consist of thousands of non-locals requiring accommodation near the mine site. Social and human rights impacts and risks being at their peak, it is crucial that contractors understand the potential impacts associated with their activities and implement the identified mitigations and controls, as agreed.

EPCM
Requirements for contractor social management continue to apply as the site moves into closure. Contractors undertaking work for closure execution and subsequent monitoring and maintenance phases may be managed at BU level, in which case accountability for following the contractor management process will also move to BU level.

Potential social and human rights impacts and risks associated with contractor v. owner execution of closure activities should be considered when determining the most appropriate option.

Contractors must be aware of and support sites in achieving the social transition success criteria and post-mining land use plan. Contract terms should be reviewed to ensure they align with social transition requirements.

Closure planning: Social transition
The following provides guidance on how to implement the Group Contractor Performance Management Standard. The Standard should be read alongside this guidance. It applies to the Supply Chain, S&SD and Social Performance disciplines and defines five steps in the contractor-management process. For each step, the Standard outlines the minimum requirements at a high level.

The guidance in this section is structured according to those same five steps – or 'tasks', as outlined below – but focuses on the social performance aspects of contractor management in more detail. The Standard and this guidance apply to all types of contracts, from large contractors to smaller contractors providing transportation services, for example.
While this section does not explicitly follow the Plan Do Check Act cycle, it does so implicitly. The Plan stage of Plan Do Check Act is covered in the Define and Plan, Sourcing and Contracting and Pre-Commencement steps of the Group Contractor Performance Management Standard. The Do stage is covered in the contract execution component of the Contract Execution and Performance Management step. The Check stage is covered in the performance management component of the Contract execution and Performance Management step, as well as in the Close-out step of the Group Contractor Performance Management Standard where lessons learned are identified. The lessons learned should be used to improve contractor social management policies, processes and activities at the site, and inform future contractor selection.
Task 1 - Define and plan

Task 2 - Sourcing and contracting

Task 3 - Pre-commencement

Task 4 - Contract execution and performance management

Task 5 - Close-out

Screen for social materiality

Criteria for socially material contracts should be established and included in the site's procurement procedures. The objective of establishing criteria for social materiality is to screen whether the draft scope of work includes potential social and human rights impacts and risks that need to be managed. The criteria should be appropriate to the local site and community context: what is socially material for one site may not be socially material for another. For example, socially material criteria could include one or more of the following elements:

- Procurement categories with high potential social and human rights impacts and risks, such as construction contracts (including EPCM), transportation, security
- Size of the workforce
- Workforce requiring accommodation
- Financial value of the contract
- Duration of the contract
- Potential for significant numbers of non-local workers
- Potential for local recruitment
- Potential for local contracting
- Work activities that require engagement with communities and other local stakeholders
Assessing whether a scope of work is socially material is typically conducted using a checklist of socially material criteria, developed with or by the Social Performance Manager. If a scope of work is not deemed socially material, only the minimum requirements (see Box 4B.1) should be included in the contract. No additional due diligence on the contractor in terms of social performance is required, no tender questions specific to social performance need to be included, and the contractor is not required to develop a CSMP.

If a scope of work is socially material, the guidance outlined in the rest of this section must be followed.

- Work activities that could cause damage to private property or limit public access
- Whether the work is to be performed inside or outside the site’s Area of Influence

**Box 4B.1 – Minimum contract requirements**

IFC

- **Worker grievance process**: The contract should require the contractor to implement a grievance process for workers, including the workers of its sub-contractors. The worker grievance process can be that of the contractor, if the grievance process is in line with Performance Standard 2. Alternatively, Anglo American’s worker grievance mechanism can be extended to the contractor. The contract should specify how grievances should be addressed and it should outline roles, responsibilities and required reporting on worker-related grievances.

- **External grievance process**: The contract should require the contractor to participate in the site’s external grievance process, and clearly outline the contractor’s responsibilities in investigating and resolving any grievances related to the contractor. The contract should include information about the site’s external grievance process, including response and investigation timelines, and specify what the contractor should do if an external stakeholder directs a complaint to the contractor.

- **Incident reporting investigation**: The contract should specify what the contractor should do if an incident related to its scope of work occurs. The contract should require the contractor to participate in the investigation of incidents as deemed necessary by Anglo American. The contract should include information on Anglo American’s Learning from Incidents (LFI) investigation process.

- **Labour rights**: The contract must specify applicable labour rights, including but not limited to minimum wages, working hours and overtime, payment frequency, freedom of association and collective bargaining, as well as policies with regards to forced and child labour, non-discrimination, retrenchment and collective dismissals, in line with applicable laws and International Labour Organization standards.

- **Sub-contractor management**: The contract should specify that contractors are responsible for social performance management of their sub-contractors and suppliers. This includes ensuring that labour standards and local hiring and local procurement requirements are enforced throughout the contractor’s supply chain involved in delivering the contract.

- **Cultural heritage**: The contract should include the site’s Chance-Find Procedure.

- **Induction**: The contract should specify that all contractor employees are required to participate in a site-induction programme, which includes social performance topics relevant for the site, such as: the external grievance mechanism; the worker grievance mechanism; the local community context and other external stakeholder issues the contractor should be aware of; incident reporting and investigation requirements; and guidelines for engaging with local communities.

- **Code of Conduct**: Anglo American’s Code of Conduct should be included in the contract. Sometimes a specific code of conduct for contractors is developed, that outlines behavioural guidelines for work outside the fence and for engagement with stakeholders.
An assessment of potential social and human rights impacts and risks associated with the scope of work should be conducted by the social performance team in conjunction with the requestor, using Section 3C. Table 4B.1 provides an overview of typical contractor-related risks and impacts.

The site should also think about whether and how the scope of work can support the local socio-economic benefit delivery strategy in terms of local procurement. Guidance on this is provided in Section 4A on Socio-Economic Development.

### Table 4B.1 Examples of potential social and human rights impacts and risks associated with contractors

<table>
<thead>
<tr>
<th>Impact and risk category</th>
<th>Examples of potential impacts</th>
<th>Description of potential impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community health and safety</td>
<td>Increase in HIV/AIDS and other sexually transmitted infections, and increase in prostitution, because of contractor workforce</td>
<td>The employment of (contractor) workers who live without their families or away from their home can result in casual sexual relations, including relations with commercial sex workers. Such behaviour increases the risk and incidence of transmission of communicable diseases such as HIV and other sexually transmitted infections.</td>
</tr>
<tr>
<td>Community health and safety</td>
<td>Personal and political security</td>
<td>Contractor workers who live without their families or away from their social network may engage in casual sexual relations with members of the local community and may create increased demand for commercial sex workers. This may lead to an increase in the number of people engaging in prostitution. Young girls and women may also be tempted to engage in sexual relationships to attract workers with money. This can lead to various indirect impacts including unwanted pregnancies and increased risk of impoverishment for single mothers, increased school drop-out rates for young girls, and family breakdown.</td>
</tr>
<tr>
<td>Community health and safety</td>
<td>Inadequate housing conditions provided to contractor workers</td>
<td>When a contractor needs to provide accommodation for its workers, such accommodation should safeguard the health and safety of the workers and provide adequate and sanitary living conditions and appropriate leisure and health facilities.</td>
</tr>
<tr>
<td>Community health and safety</td>
<td>Economic</td>
<td>Negative environmental impacts on communities (water quality, water quantity, hazardous material spills, dust, noise, vibration) impacting on community health and safety and/or livelihoods</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Various contractor activities can negatively impact on the environment, which in turn can affect local communities. For example, blasting can cause nuisances in terms of noise; exploration drilling contractors can pollute private landowners' land; heavy contractor traffic on public roads can increase dust; incorrect disposal of waste can pollute ground and surface water; and incidents involving hazardous materials spills can impact on community health and safety.</td>
</tr>
<tr>
<td>Community health and safety</td>
<td>Increase in traffic in local communities, increased risk of collisions</td>
<td>Contractor transportation services (including worker/personnel transportation) using public roads can significantly increase traffic in local communities and negatively affect community health and safety in relation to accidents, noise, and dust generation.</td>
</tr>
</tbody>
</table>
Impact and risk category

Examples of potential impacts

Description of potential impact

Contracts and scopes of work typically associated with potential impact

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**Personal and political security**

Reputational risk to the business

(Perception of) lack of fairness and transparency in the contracting and/or recruitment processes used by the contractor

Tension and/or conflict can result from resentment by local residents if they perceive that contractors have hired non-locals or expatriates into jobs for which locals are or perceive themselves to be qualified. Resentment from local residents can also result from contractors hiring a local workforce, with only some individuals/groups benefiting and others not.

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**Personal and political security**

Human rights infringements by security contractors

Security service providers can infringe on the human rights of community members or other external stakeholders. These risks are outlined in more detail in the Security Section (4E).

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**Personal and political security**

Labour rights infringements of contractor workers

Labour rights infringements can include unfair dismissals, withholding of wages, denial of freedom of association or collective bargaining, unfair or discriminatory terms and conditions of employment, use of child or forced labour, withholding of passports and other documents for identification, unsafe or unhealthy working conditions or accommodation, etc.

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**Infrastructure and services**

Lack of availability and affordability of housing for local residents

Sometimes a contractor needs to provide accommodation for its workers outside the mine area. Options typically considered are a worker camp (such as when there is a large, foreign workforce on a temporary construction contract) or the integration of workers into local settlements (such as when there is a moderate-sized workforce on a long-term operational contract).

Each of these options has its own range of positive and negative impacts. Generally, it is easier to control and provide for a large, temporary workforce if it is housed on site in a purpose-built accommodation camp. However, this can result in dissatisfaction among local communities, who may feel alienated and who may be unable to see any tangible economic benefits for the community from the workers' presence.

On the other hand, provision of housing within local settlements carries its own risks, such as increased pressure on local infrastructure and services, potential for cultural and religious insensitivity, increased sexual relations with local residents and associated spread of communicable diseases, and increase in other social ills.

Decisions around which option is most suitable should be dictated by the following:

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**Infrastructure and services**

Damage to private property

Certain contractor activities could result in the contractor accidentally damaging the private property of external stakeholders. For example, exploration drilling contractors could unintentionally damage access gates of private landowners, or vibrations caused by heavy contractor vehicles (e.g., trucks) damage houses located along the public-transportation road.

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**Contracts with a large non-local workforce**

Contracts requiring significant recruitment and procurement

Security service providers

All contractors

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**Contracts requiring worker accommodation**

Exploration drilling contractors

Transport contractors

Any work conducted outside of mine area
Impact and risk category

Examples of potential impacts

Description of potential impact

Contracts and scopes of work typically associated with potential impact

Socio-cultural networks

Increase in crime rates, social ills, and resentment among the local population as a result of demobilisation of a large non-local contractor workforce

Sometimes non-local, demobilised contractor workers do not leave the local communities after they have been demobilised. Impacts linked to demobilisation can include an increase in resentment by/of the local population and an increase in crime rates and social ills.

Socio-cultural networks

Increased skills and training opportunities in the local area

Anglo American provides numerous opportunities for contractor employees to improve their skills and experience, thereby enhancing their employability. This can include training courses for contractors on required health, safety and environmental standards.

Socio-cultural networks

Rude or inconsiderate behaviour of contractor workers towards local residents

Contractors, exploration drilling contractors, contractors that have a temporary office in the local communities, and contractor non-local workers that live in worker accommodation typically interact with local community members on a regular basis. There is a risk that, in this interaction, contractor workers are (perceived as) rude, disrespectful, or inconsiderate, especially if not familiar with local customs.

Economic

Increased local employment

One of the key potential benefits of mining is increased local employment; the extent of these benefits can be limited, however, by the lack of suitable skills at the local level.

Economic

Increased demand for local goods and services

National and local businesses can benefit from procurement opportunities for goods and services with Anglo American sites. Large Anglo American contractors typically contract parts of their work out to smaller contractors, which local service providers may be able to benefit from.

Economic

Decreased or limited access to land used for livelihood activities

Implementation of contracts that require the construction of infrastructure outside the mine area can result in (temporary) limitations in accessing land areas owing to imposed restrictions on movement or access.

Reputational risk to the business

Raised/unrealistic local community expectations because of contractor commitments

When contractors (such as contractors) interact with community members or other external stakeholders on behalf of Anglo American, there is a risk that they make commitments (for example, about available job opportunities) which Anglo American is not able to fulfil, resulting in frustrated community members.
Prepare the tender documentation
The purpose of the tender process is to select the most suitable contractor to implement the scope of work and who can successfully manage the potential social and human rights impacts and risks associated with it.

The site’s social performance team should work with the site’s supply chain team to ensure that appropriate and specific social performance objectives, targets related to social performance and minimum social performance controls, standards or requirements are included in the tender documentation. The tender documentation should also include relevant background information about the Area of Influence that helps highlight and contextualise social performance issues.

The information in the tender documentation should be tailored to the scope of work. The more generic the tender documentation is in terms of social performance expectations and requirements, the more difficult it is for the contractor to understand what is expected, appropriately price its proposal, allocate sufficient financial and human resources, and demonstrate their experience in meeting the requirements. Merely including the Anglo American Social Way Policy and Guidelines as part of the tender documentation does not provide sufficiently detailed information for the contractor to understand the social objectives and requirements specific to the scope of work.

The tender documentation and scope of work should therefore clarify social performance expectations, including compliance with relevant Social Way requirements. This can be done by setting social performance objectives, binding contractor-performance targets and minimum controls the contractor must implement, if these exist. Examples of controls for potential social and human rights impacts and risks related to contractor activities can be found in Table 4B.2. The contractor should be asked to provide implementation plans explaining how it aims to achieve the objectives and targets set, which must be approved by the site before the work commences.

Where an contractor is being sourced, a comprehensive document detailing their approach to social performance should be provided by the contractor, which includes a description of how social performance requirements are cascaded to the sub-contractors and monitored. The document forms part of the tender documentation (and will form part of the final contract) and spells out in detail the requirements to manage potential social and human rights impacts and risks, including clear definitions of responsibilities, an overview of applicable standards and legislation, social performance training needs, social performance measurement tools, contractor performance monitoring, requirements to offices in local communities Contractors with a non-local workforce living in worker accommodation Exploration drilling contractors Earthwork contractors Construction contractors EPCM EPCM
The identified potential social and human rights impacts and risks associated with the scope of work.

Requirements to implement specific or minimum controls or mitigation measures in relation to the above potential social and human rights impacts and risks.

Social performance objectives and targets.

Relevant parts of the site's Social Management Plan (SMP).

The latest socio-economic baseline information of local communities.

An overview of the Area of Influence, and a definition of ‘local’.

Relevant parts of the site's commitment register, including Impact Benefit Agreements, Social and Labour Plans, licences and permits.

The site's external grievance process and a description of how the contractor will be required to participate in grievance management and investigation.

The site's worker grievance process (and/or YourVoice) and the requirement for the contractor to provide a grievance process that meets or exceeds the site's standards to its workers or extends the site's grievance process to its workers.

The Anglo American definition for incidents and the requirement for the contractor to report immediately any incidents with social consequences in which it is involved.

The requirement for the contractor to participate in any Learning from Incident (LFI) investigations of incidents related to its activities.

Requirements for minimum qualified resources to manage social performance (for example, a social performance manager, community liaison officers), as applicable.

An overview of applicable Anglo American, local and International Labour Organization (ILO) laws and standards on minimum wages, hours of work, overtime work, collective bargaining, child labour, forced labour, and social security.

An overview of minimum requirements for worker accommodation.

Targets or objectives for local employment and local procurement, including the definition used for ‘local’ and the definition used for ‘skilled’ and ‘unskilled’ work.

Any requirements to follow a specific process for hiring local workers and sub-contracting local companies, as well as required payment terms.

The site's Chance-Find Procedure and the requirement that the contractor implement the procedure.

A description of applicable standards and regulations, including national and international legislation.

The Voluntary Principles on Security and Human Rights (VPSHRs), and a description of any specific requirements the security contractors should implement or adhere to.

Anglo American's Social Way Policy, the Anglo American Code of Conduct, the Anglo American Human Rights Policy, and other relevant policies, plans and standards, such as: retrenchment policy and procedures; equal opportunity and diversity policy and procedures; alcohol and drug policy; emergency-preparedness and response plans.
as those social risks and impacts related to hazardous-materials spills, water management, vehicles using public roads, and the generation of dust, noise and vibration. As such, the applicable standards, requirements and controls will typically be included as part of the safety, health and environment (SHE) component of tender documentation.

Preparing tender questions

The tender documentation should include a request for the contractor to provide information regarding its social performance management capabilities, as relevant to the scope of work. The site's social performance team should work with the site's supply chain team to include appropriate tender questions and requests for information from the contractor regarding its social performance experience and approach. The amount and level of detail of information requested from contractors should be commensurate to the risks and impacts associated with the contract. For example, tender questions will be more extensive than for other contractors.

Information can be requested about one or more of the following:

- **EPCM**
  - The contractor's experience with implementing scopes of work with similar social performance objectives, targets, and social and human rights impacts and risks. Box 4B.3 lists examples of information that can be requested to demonstrate the contractor's experience with similar issues.

- **CSMP**
  - The contractor's existing policies and systems, relevant to the scope of work and associated risks and impacts. Box 4B.5 lists some examples.

- **Human and financial resources**
  - The contractor proposes to provide to manage the potential social and human rights impacts and risks associated with the contract and adhere to Anglo American's standards and requirements. Box 4B.6 provides some examples.

To assess contractor experience, depending on the scope of work and associated risks and impacts, a selection or combination of the following information can be requested:

- Experience with contracts in similar contexts and with similar social performance objectives, targets, and social and human rights impacts and risks; how these objectives and targets were achieved; and how social and human rights impacts and risks were managed, including any lessons learned.

- Experience with regards to labour management (both direct and indirect in terms of sub-contractors), including:
  - Incidents such as worker strikes or demonstrations and how these were resolved.
  - Fines and sanctions imposed by labour regulators and authorities.

**Box 4B.3 Examples of general information that may be requested to assess contractor experience**

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Details on how the contractor has managed a large non-local workforce in the past.

Details on how the contractor has managed a large number of sub-contractors in the past, in particular with regards to ensuring that sub-contractors adhere to the contractor's labour standards.

Details on how the contractor has managed retrenchment and demobilisation of its workforce in the past.

An organisation chart of a past contract as an example that shows how social performance and labour issues were managed at the site level, including in relation to sub-contractors.

Experience in relation to grievance and incident management, including:

- The number of stakeholder grievances received in the past three years, disaggregated by severity and topic, and a description of how these were resolved, including any lessons learned.

- The number of worker grievances (including from sub-contractor workers) received in the past three years, disaggregated by severity and topic, and a description of how these were resolved, including any lessons learned.

- The number of incidents involving contractor vehicles on public roads (including accidents), and how these were investigated and resolved, including any lessons learned.

- The number of grievances related to contractor camps, disaggregated by topic, including details of how these were solved, and any lessons learned.

Experience with selecting and managing sub-contractors, particularly in relation to:

- An example of a past project where the contractor experienced issues with sub-contractor management of social and labour issues, and how these were resolved.

Examples of experience of procurement of local goods and services, including how the contractor achieved this at equivalent quality and price.

How the contractor has successfully monitored sub-contractors' compliance with social and labour requirements on a similar contract.

How the contractor has successfully developed local suppliers on a similar contract.

Experience in hiring locally, particularly in relation to:

- Achieving local hiring targets and objectives.

- Ensuring that sub-contractors comply with local hiring targets and objectives.

Experience regarding the provision of worker accommodation, in particular in relation to the standards that were applied to sanitation, access to potable water, waste management, etc.

Experience with prevention and handling of emergencies that may affect communities, such as an explosion, traffic accident, or an environmental spill or release into a local water course.

Experience with community engagement and knowledge of stakeholder engagement techniques.

Experience may also involve respecting existing relationships between the site and local communities, and/or how the contractor contributed to that relationship.

Experience with security-related incidents received when working on similar contracts, and how these incidents were dealt with.

Experience with cultural-heritage management, including the implementation of Chance-Find Procedures.
The following information can be requested to assess the contractor's understanding of the potential social and human rights impacts and risks in relation to their scope of work, as well as the Anglo American requirements and standards the contractor is expected to adhere to:

- A description of the social issues related to the scope of work, including the local context, in the contractor's own words.
- An outline of an approach, solutions or options proposed by the contractor to manage the risks and potential impacts associated with the contract and meet relevant Anglo American standards and requirements, such as for:
  - achieving targets and objectives for local employment, including the expected size of the (local) workforce, disaggregated by unskilled and skilled workers
  - building local labour capacity
  - recruitment of local workers, including advertising of opportunities and the employee-selection process
  - demobilising and retrenching employees
  - subcontracting of local companies, including advertising of opportunities and the supplier-selection process
  - engagement with communities
  - respecting community culture and customs
  - worker accommodation, including number of workers to be housed, type of accommodation proposed, standard of living conditions, etc.
  - management and monitoring of subcontractor social performance and labour management
  - managing labour-related grievances, including those of subcontractors
  - managing community-related grievances
  - investigating incidents.

For social and human rights impacts and risks with an environmental or other non-social cause, the contractor approach to managing these issues and adhering to Anglo American's standards and requirements will typically be requested as part of the component of tender documentation.

BOX 4B.4 Examples of information that may be requested to assess contractor understanding of potential social and human rights impacts and risks for this contract

- The following information can be requested to assess the contractor's current policies and systems:
  - policies related to sustainability
  - policies related to stakeholder engagement
  - policies related to security and human rights
  - policies related to diversity of the workforce, including anti-harassment and non-discrimination

BOX 4B.5 Examples of information that may be requested to assess adequacy of contractor current policies and systems

- The following information can be requested to assess the contractor's understanding of the potential social and human rights impacts and risks for this contract.

- The following information can be requested to assess the contractor's current policies and systems:
policies describing expectations for the behaviour of direct and sub-contracted employees in the host community

policies related to local procurement and supplier development

Code of Conduct

grievance mechanism in place for external stakeholders

grievance mechanism in place for workers and sub-contractor workers

incident-management procedure

systems in place to monitor sub-contractors' compliance with social and labour requirements

systems in place to incorporate social performance management into general project management.

For social and human rights impacts and risks with an environmental or other non-social cause, the relevant policies and systems will typically be requested as part of the SHE component of tender documentation.

In order to assess the proposed human and financial resourcing of the scope of work, the contractor can be requested to:

explain how it will ensure that social performance management staff with appropriate qualifications and experience are available

provide a breakdown of allocation of financial resources to manage potential social and human rights impacts and risks associated with the contract, including for the implementation of specific requirements and controls.

Contractors should be required to provide an overview of key personnel, including their experience and qualifications, who will work on implementation of (parts of) the scope of work. This may include the identification of a social performance point of contact for the duration of the contract, who is responsible for monitoring the implementation of CSMP and engaging and co-ordinating with the company representative.
The information requested in the tender documentation should form the basis of the social performance criteria used to evaluate contractors' bids. Anglo American's or the site's own previous experience of working with a contractor, as well as any high-profile adverse press and media reports on social and human rights-related issues related to the contractor, could also inform the evaluation. For security-related contracts, due diligence on the contractor must be conducted in accordance with the... Box 4B.7 provides examples of due-diligence topics for security contractors.

The social performance team should evaluate the social performance component of bids. Where significant potential social and human rights impacts and risks are foreseen, social performance managers should be involved in the proposal evaluation process.

Where social performance risks and opportunities are material, adequate management of social issues should be a basic eligibility requirement and non-compliant bids should either be rejected, or tenderers should be required to re-work their proposals. Options for achieving this include a simple pass/fail approach, or the bid-evaluation criteria could require minimum scores in each area (price, technical, social performance).

In circumstances where the social requirements are particularly challenging or unusual there may be an opportunity to work with the contractor to develop its capacity and improve its social performance approach to satisfactory levels before mobilisation. However, this approach should be carefully considered as it may fail and may result in delays to the schedule and an increase in costs.

Some social and human rights impacts and risks associated with the scope of work may have an environmental or other non-social cause, such as those social risks and impacts related to hazardous-materials spills, water management, VPSHRs... SHE... 4.IMPACT AND RISK PREVENTION AND MANAGEMENT 4B.2 Guidance
vehicles using public roads and the generation of dust, noise and vibration. As such, the evaluation of contractor competence in these areas will typically be included as part of the technical and/or social performance considerations may need to be integrated into those assessment criteria. This is typically the case for exploration drilling, as well as for transportation contractors.

A combination of one or more of the following could be considered grounds for disqualification of the contractor based on social performance, depending on the scope of work and associated social and human rights impacts and risks:

- Insufficient experience with implementing scopes of work with similar social and human rights impacts and risks
- Lack of understanding of the social and human rights impacts and risks in relation to the scope of work
- Insufficient human and/or financial resources committed to implementing the social performance aspects of the scope of work
- Failure to meet or adequately respond to tender documentation requirements and questions relating to social performance
- Failure to declare compliance with relevant standards, policies and other requirements
- Evidence of ongoing and unresolved labour issues with contractor and sub-contracted workers
- A history of fines and sanctions imposed on the contractor by labour regulators and authorities
- Evidence of ongoing and unresolved material community grievances
- Material adverse media and press reports on social performance issues
- Refusal to adhere to Anglo American policies and standards or recognised equivalents.

As part of the due diligence conducted on private security providers, the following should be considered, and findings and conclusions must be documented:

- Contractor’s history of respect for/violations of human rights law and international humanitarian law
- Personal/management and business reputation
- Litigation and criminal-offence history
- Training provided by the contractor to its employees on human rights
- Business and equipment licences, particularly as these relate to weapons and firearms
- Procedures on use of force and firearms, policies regarding appropriate conduct and the local use of force; e.g. rules of engagement
- Any commitments the contractor has made around human rights/international best practice.

Before mobilisation, the background of all security staff must be checked as part of a Pre-Employment Screening to ensure that individuals credibly implicated in human rights abuses are not deployed. This should include conducting an official check of police records for any outstanding criminal warrants, and a check of records of the appropriate law enforcement authorities and judiciary.

Please see the section on Security Management and the Voluntary Principles on Security and Human Rights (VPSHR) for more information (see Section 4E). There are also a number of international documents relating...
Contractual language

Depending on the scope of work and severity of potential social and human rights impacts and risks, and whether social performance contractual terms have been standardised based on the scope of work, the inclusion of social performance elements in the contract can be undertaken by the supply chain team or the legal department. For non-standardised language and more complex scopes of work, the social performance team should provide support and oversight.

Rather than relying on general language to describe the required social performance objectives, targets and controls the contractor is expected to implement, the contract must be specific to the scope of work and associated potential social and human rights impacts and risks. The contractual language pertaining to social performance is a combination of the requirements outlined in the tender documentation and the proposal of the contractor. Table 4B.2 and Box 4B.8 include examples of social performance issues to be included in contracts. For each of the social performance requirements and management actions, a corresponding verification and validation action should be specified, as far as possible.

Sometimes, the social performance component of the contractor's proposal necessitates some adjustment or improvement. Also, at times, contractors may need to finalise some social performance plans before contracts are signed and/or work can commence. For contracts with material potential social and human rights impacts and risks, the Social Performance Manager should review and approve the documentation.

The contract should specify that timely resolution of non-compliances is required, that corrective action should be implemented as identified, and it should detail the circumstances under which the contract can be terminated, payment to the contractor can be withheld, and/or the contractor can be required to stop work. Such circumstances could include failure to take appropriate action, ongoing unsatisfactory management of social performance issues, ignoring notices and warnings, etc. Unless included in the contract, Anglo American will likely not be able to impose social performance requirements on the contractor without having to renegotiate the contract, which could jeopardise the implementation schedule.

Depending on the scope of work and associated potential social and human rights impacts and risks, the following topics should be considered for inclusion in the contract (see also Table 4B.2 for controls and requirements based on typical contractor-related social and human rights impacts and risks):

- Payment structure: The contract should specify that payments shall be based in part on satisfactory implementation of social performance requirements. Key Performance Indicators (KPIs) used to measure and evaluate contractor social performance should be included. Milestone and final payments for completion or partial completion of work should be specified, including penalties (including the right to terminate the contract) for failure to implement required controls, actions and other requirements. The payment structure may also include financial incentives for good social performance management, such as: a higher contractor-evaluation score at contract close-out, which will positively impact on the
The contract should specify that appropriate key social performance personnel be appointed by the contractor. The contract should refer to the number of full-time equivalents required at various levels of seniority; the required qualifications and high-level roles and responsibilities of key social performance personnel, such as those responsible for community health, safety and security; worker accommodation; and grievance management. Should a prospective contractor propose to substitute key social performance personnel, the contract should require that the replacement(s) has at least equivalent qualifications and experience of the previous professional and that they be approved by the site.

**Training**

The contract should specify the roles and responsibilities regarding social performance training needs of contractor workers. Where appropriate, the contractor should be asked to submit a training plan, which must be approved by an appropriate site representative, as part of the contract.

**Reporting**

The contract should specify required social performance reporting, including the frequency of reporting. The contractor should also be required to maintain records of social performance.

**Audits and inspection**

The contract should specify that announced and unannounced audits and inspections may be conducted by Anglo American. In terms of social performance, this could include inspections of worker accommodation, and, where legally permitted, audits of worker contracts and payslips (including those of sub-contractor workers), etc.

### Table 4B.2 Examples of potential social and human rights impacts and risks and controls/requirements for contractors

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples of potential impacts</th>
<th>Examples of requirements for contractors</th>
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<tbody>
<tr>
<td><strong>Community health and safety</strong></td>
<td>Increase in HIV/AIDS and other sexually transmitted infections and increase in prostitution, as a result of a workforce</td>
<td>Implement an STI and HIV/AIDS training and education programme which addresses the symptoms and behaviour change issues around the transmission and infection of HIV/AIDS, as well as other communicable diseases. In areas where there is a lack of recreational activities, consider the provision of suitable recreational infrastructure and opportunities; for example, in the (contractor) worker camp(s). It may be necessary to require a closed (contractor) camp, with limited interaction allowed with local residents. In such instances, it is vital to ensure adequate recreational facilities for the construction workforce and ensure that work rotations are suitable for maintaining the mental health of the workforce. Dry camps prohibiting alcohol or any other substance use. Develop guidelines which clearly outline expectations for (contractor) workforce behaviour. Develop and implement induction programmes, including a Code of Conduct and cultural awareness programme, for all new workers. This should increase sensitivity to local norms and customs and ensure that contractor workers are aware of appropriate and acceptable behaviours. If a contractor worker camp is deemed appropriate, consider a strategic location to limit the impact of the high numbers of external workers converging on local communities. If appropriate, require a closed contractor worker camp to limit the interaction between its workforce and local communities. Dry camps prohibiting alcohol or any other substance use. In areas where there is a lack of recreational activities, consider the provision of suitable recreational infrastructure and opportunities; for example, in the (contractor) worker camp(s). Develop guidelines which clearly outline expectations for (contractor) workforce behaviour. Contractually require the contractor to provide worker accommodation in compliance with Anglo American standards, as well as with national and local building regulations, including applicable standards on food safety, water, sanitation, waste management, and fire safety.</td>
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<td><strong>Personal and political security</strong></td>
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<td><strong>Community health and safety</strong></td>
<td>Sex</td>
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<tr>
<td><strong>Socio-cultural networks</strong></td>
<td>Sexual exploitation and abuse</td>
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<td>Community</td>
<td>health</td>
<td>Negative environmental impacts on communities (water quality, water quantity, noise, vibration)</td>
<td>Require contractors to make information about job opportunities available. Requirements for contractor.</td>
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<td>safety</td>
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**Contract requirements for contractors**

- **Process:** The contract should include a definition for discrimination and specify how promotion of equal opportunity and a diverse workforce, including in relation to recruitment, hiring, and the prevention of discrimination. The contract should set targets, objectives, and/or conditions around the recruitment, hiring, and promotion of equal opportunity and a diverse workforce.
- **Transparency:** The contract should require the contractor to report any incidents involving discrimination or mistreatment as per the relevant laws and regulations, and to report any investigations conducted. The contract should require the contractor to maintain records of any grievances related to the contractor's operations, and to participate in the site's external grievance mechanism and associated investigations. The contract should require the contractor to develop and implement a site-specific grievance investigation process, and clearly outline the contractor's responsibilities in this regard.
- **Preventive Measures:** The contract should require the contractor to implement and maintain a site-specific fire prevention and response plan (including potential impacts on external stakeholders, and response timelines). The contract should include the contractor's plan for first aid and medical facilities, with appropriate accommodations for workers. The contract should require the contractor to provide access to emergency medical services, and to develop and implement a site-specific incident-investigation process, and clearly outline the contractor's responsibilities in this regard.
- **Worker Accommodation:** The contract should require the contractor to provide appropriate worker accommodation that is clean, safe and meets the basic needs of workers. The contractor should also provide rest and recreation rooms, common dining rooms, and other facilities as required. The contractor should also provide access to first aid and medical facilities, including provision of emergency medical services. The contractor should also ensure that worker accommodation is accessible to workers, and that movement to and from the accommodation is not unduly restricted.
- **Hazardous Materials Management:** The contract should require the contractor to implement and maintain a hazardous materials management plan, and to provide appropriate training and oversight to ensure compliance. The contractor should also provide appropriate hazardous materials training and oversight, and to develop and implement a site-specific incident-investigation process, and clearly outline the contractor's responsibilities in this regard.

**Other Requirements:**
- **Transportation:** The contractor should be contractually required to implement a traffic emergency-planning process that considers the specific driving route, and to develop a traffic emergency-planning process. The contractor should also be required to conduct a traffic-safety risk analysis, and to develop and implement a site-specific traffic-safety risk analysis plan, and clearly outline the contractor's responsibilities in this regard.
- **Driver Training:** The contractor should be required to provide minimum vehicle standards, and to adhere to speed limits. The contractor should also be required to monitor the speed and movement of drivers. The contractor should also be required to conduct a driver-safety programme, and to only use vehicles that adhere to Anglo America's minimum vehicle standards. The contractor should also be required to participate in the investigation of incidents as deemed necessary by the contractor, and to develop and implement an incident-investigation plan, and clearly outline the contractor's responsibilities in this regard.
- **Accommodation:** The contractor should be required to provide appropriate worker accommodation that is clean, safe and meets the basic needs of workers. The contractor should also provide rest and recreation rooms, common dining rooms, and other facilities as required. The contractor should also provide access to first aid and medical facilities, including provision of emergency medical services. The contractor should also ensure that worker accommodation is accessible to workers, and that movement to and from the accommodation is not unduly restricted.
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Impact
Category
Examples of potential impacts
Examples of requirements for contractors

Personal and political security
Rude or inconsiderate behaviour of contractor workforce towards local communities.

Contractually forbid the use of child and forced labour in the supply chain.

Ensure contractor employees are aware of/have access to site-worker grievance mechanism, including confidentiality of information.

Include the security contractor training plan and grievance investigation process.

Specify whether security forces are allowed to use force or not.

Specify that contractors are required to exercise restraint and caution in a manner consistent with the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN Code of Conduct for Law Enforcement Officials.

Develop and implement induction programmes, including a Code of Conduct and cultural-awareness programme, for contractor workers. This should increase sensitivity to local norms and customs and ensure that contractor employees are aware of appropriate and acceptable behaviours.

Where force is used, require the contractor to properly investigate and report the incident to the site security manager, and refer the matter to the local authorities.

In a case where physical force is used, require the contractor to provide medical aid to injured persons, including to offenders.

Where force is used, the contractor should participate in the site's external grievance mechanism and associated response and investigation timelines.

The contract should include information on Anglo American's Code of Conduct, which prohibits bullying, discrimination or harassment.

The contract should require the contractor to develop and implement policies regarding appropriate conduct and the use of force.

In the event of any reports of unlawful or abusive behaviour by contractor personnel, the contractor should participate in the investigation of incidents as deemed necessary by the contractor and any local authorities.

Costs and other matters related to force should be borne by the contractor, and force should only be used when strictly necessary and to an extent proportionate to the threat.

If appropriate, require a closed contractor worker camp to limit the interaction between its workforce and local communities.

If appropriate, consider a strategic location to limit the impact of the high numbers of external workers converging on local communities.

If appropriate, enable the contractor to present a list of external workers to the police for identification during off-hours, and provide an address to local entities to identify potential local contractors.

The contract should include a definition for the term 'local' procurement, and include any targets, objectives, and/or conditions for, for example, a contractor to be trained on the site's external grievance mechanism, including confidentiality of information and grievance investigation process. The contract should incorporate specific requirements and roles and responsibilities for the contractor in terms of stakeholder engagement, including engagement with local communities.

If appropriate, consider a closed contractor worker camp to limit the interaction between its workforce and local communities. This should increase sensitivity to local norms and customs and ensure that contractor employees are aware of appropriate and acceptable behaviours.

If appropriate, take into account areas around local procurement. For example, if the contractor is recommended to use a site's database of (pre-approved) enforcement officials, then the contract should specify this.

The contract should include information on Anglo American's Code of Conduct, which prohibits bullying, discrimination or harassment.

The contract should require the contractor to participate in the site's external grievance mechanism and associated response and investigation timelines.

Costs and other matters related to force should be borne by the contractor, and force should only be used when strictly necessary and to an extent proportionate to the threat.

If appropriate, enable the contractor to present a list of external workers to the police for identification during off-hours, and provide an address to local entities to identify potential local contractors.

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Impact

Category

Examples of potential impacts

Examples of requirements for contractors

Infrastructure and services

Pressure on availability and affordability of local housing

Where worker camps are preferable, the following requirements for contractors should be considered:

Contracts should include the contractor’s plans (approved by the appropriate site representative) for worker accommodation, with details of location, timelines, size, standards, etc.

Infrastructure and services

Damage to private property

The contract should require the contractor to participate in the site’s external grievance mechanism and associated grievance investigation process, and clearly outline the contractor’s responsibilities in investigating and resolving any grievances related to the contractor’s behaviour, activities, scope of work, etc. It should include information about the site’s external grievance mechanism, including response and investigation timelines.

Socio-cultural networks

Demobilisation of a large non-local contractor workforce, resulting in an increase in crime rates and social ills

Socio-cultural networks

Increased skills and training opportunities in the local area

Economic

Increased local employment

Require contractor adherence to standards on child labour, forced labour, minimum wages, working hours, social security, etc.

ILO

Prohibit Anglo American contractors from withholding workers’ passports and other identification documents.

Specify health and safety requirements for worker accommodation (see above).

Contractually allow for termination of the contract where there is credible evidence of ongoing labour-rights infringements.

The contract should require the contractor to implement a grievance mechanism for workers, including the workers of its subcontractors. The worker grievance mechanism can be that of the contractor, if the grievance mechanism is in line with Performance Standard 2. Alternatively, Anglo American’s worker grievance mechanism can be extended to the contractor. The contract should specify how grievances should be addressed and it should outline roles, responsibilities, and required reporting on worker-related grievances.

IFC

Camp access rules – will it be open or closed to the public, and will camp residents be allowed to use local facilities?

Realistic local-procurement requirements and targets for camp services such as catering, food, cleaning, etc.

Develop and implement induction programmes, including a Code of Conduct and cultural awareness programme, for all contractor workers. This should increase sensitivity to local norms and customs and ensure that contractor employees are aware of appropriate and acceptable behaviours.

Require the contractor to participate in any investigation process as deemed necessary by Anglo American.

LFI

Contractually specify responsibilities for compensation for any damage.

Maximise the local contractor workforce by requiring realistic targets for local employment.

Require contractors to facilitate transport of demobilised workers to their area of origin.

Require contractors to provide electronic payment of salaries to their workforce.

The contract should require the contractor to participate in the site’s external grievance mechanism and associated grievance investigation process, and clearly outline the contractor’s responsibilities in investigating and resolving any grievances related to the contractor’s behaviour, activities, scope of work, etc. The contract should include information about the site’s external grievance mechanism, including response and investigation timelines.

The contract should specify requirements for the retrenchment of (local) workers.

The contract should include the contractor’s plan (approved by an appropriate site representative) for demobilisation.

Ensure that contracts include requirements and targets for training and development of local workers.

The contract should specify the contractor plans (approved by an appropriate site representative) for skills transfer to local (unskilled) employees, and other training, for the duration of the contract.

Write requirements for maximising local employment into contracts and prohibit discrimination based on gender or diversity.
**Impact**

**Economic**
- Increased demand for local goods and services
- Limited access to land used for livelihood activities

**Reputational**
- Risk to the business
- Raised/unrealistic local community expectations due to contractor commitments

**Cultural**
- Heritage damage to cultural heritage

**Examples of requirements for contractors**

- Sites can conduct a skills census in local communities to identify suitable workers, develop a list of potential workers, and recommend contractors to use this list to hire local workers.
- Require the contractor to advertise its employment opportunities and associated skills requirements locally.
- The contract should include a definition for 'local' employment, and include any targets, objectives, and/or conditions around the recruitment, hiring and training of the local workforce. For example, if the contractor is required to use a site's pre-established process for identifying potential local job candidates, then the contract should specify this.
- The contract should include the contractor's plan (approved by the appropriate site representative) for meeting local hiring targets, including approaches for advertising, identifying and selecting local workers.
- Assess whether the scope of work/contract can support the local socio-economic benefit delivery strategy in terms of local procurement, including the potential of unbundling large contracts – see SED (section 4A).
- Contractually require contractors to prioritise local subcontracting where feasible.
- The site should conduct a local business census in local communities to identify suitable local enterprises, develop a list of such enterprises, and recommend contractors to use this list to procure locally.
- Require contractors to advertise sub-contracting opportunities locally.
- The contract should include a definition for 'local' procurement, and include any targets, objectives, and/or conditions around local procurement. For example, if the contractor is recommended to use a site's database of (pre-approved) local entities to identify potential local sub-contractors, then the contract should specify this.
- The contract should include the contractor's plan (approved by the appropriate site representative) for meeting local procurement targets, including approaches for advertising, identifying, and selecting local suppliers.
- The contract should specify requirements for sub-contractor management (including labour-related issues such as labour conditions and payment terms).
- Require the contractor to conduct the works in such a way as to minimise any public-access issues. This could include adjusted working hours.
- The contract should require the contractor to participate in the site's external grievance mechanism and associated grievance investigation process, and clearly outline the contractor's responsibilities in investigating and resolving any grievances related to the contractor's behaviour, activities, scope of work, etc. The contract should include information about the site's external grievance mechanism, including response and investigation timelines.
- Require the contractor to only make commitments to external stakeholders if these commitments have been authorised by the appropriate Anglo American staff member.
- The contract should include specific requirements and roles and responsibilities for the contractor in terms of stakeholder engagement, including engagement with local communities, government, and media. For example, a site may have guidelines for interaction with local communities which the contractor has to adhere to, or a site may have protocols for engaging with government or media which may or may not permit contractors to engage with these entities.
- Require contractors to implement the site's Chance-Find Procedure.
- Include information about cultural-heritage sites in and near the mine site, including any protection measures that have been put in place to protect these sites in the induction training to raise awareness.
A company/site representative responsible for the day-to-day supervision and management of the contractor needs to be appointed. The representative also monitors whether the contractor implements the agreed social performance requirements. Therefore, it is key that the representative understands the social performance objectives, targets, potential social and human rights impacts and risks, as well as the social performance requirements and controls the contractor will implement. Depending on the severity of the potential social and human rights impacts and risks, the Social Performance team should be involved in ensuring that the representative understands the applicable requirements.

The company representative is not necessarily responsible for monitoring all social performance actions and controls. Roles and responsibilities of the company representative and the social performance team related to the monitoring and evaluation of the performance of the given contractor should be agreed and clearly defined.

The Contractor Social Management Plan

The Contractor Social Management Plan (CSMP) forms part of the Contractor Management Plan (CMP). The includes all approved plans, procedures and specific controls and requirements for achieving social performance objectives and targets and managing potential social and human rights impacts and risks in relation to the contract. It also outlines roles and responsibilities; social performance reporting requirements; for social performance monitoring and evaluation (including verification and validation actions for each social performance requirement and management action); site visits, audits and inspections; and requirements for record-keeping. An example of an outline of the risk, impact and mitigations section of an is included in the Tools section.
and human rights impacts and risks associated with the scope of work. The contractor will consist of various plans with extensive controls that cut across disciplines, requiring coordination between the social performance, S&SD and other teams. For other contracts, a brief plan may be sufficient.

Where the potential social and human rights impacts and risks associated with the scope of work have solely an environmental or other non-social cause, such as those social and human rights impacts and risks related to hazardous materials spills, water management, vehicles using public roads, and the generation of dust, noise and vibration, a plan may not be necessary as the plans, procedures, requirements and controls form part of the component of the project.

This is typically the case for exploration drilling contracts. The CSMP can be developed by the contractor (as part of the bid), the social performance team, or a combination of teams. The CSMP must be approved by the contractor, the company representative, and by the Social Performance Manager, before mobilisation of the contractor.

Depending on the complexity of the scope of work and associated potential social and human rights impacts and risks, an appropriate CSMP may take some time to develop, which must be taken into account for resourcing and planning reasons.

The site could ask the contractor to appoint a person who, on behalf of the contractor, will be responsible for implementing the CSMP and who will be the first point of contact for the site's social performance team.

Induction training is mandatory for all contractor workers. Depending on the site and community characteristics, as well as potential social and human rights impacts and risks, the induction may include the following social performance topics:

1. Relevant Anglo American or contractual social performance requirements
2. Incident reporting and investigation requirements, and how they relate to contractors

In addition to the induction training, additional social performance training may be needed for contractor workers. For example, security workers will require training on the use of force and the VPSHRs. Other contractor workers may require training to ensure that the various standards, requirements, controls and mitigation measures are well understood.

The external grievance process, and how it relates to contractors

The worker grievance process and/or YourVoice, and how it relates to contractors

Minimum labour requirements

The local community context and other relevant external stakeholder issues
Ensuring that contractors implement the CSMP in accordance with the contract is one of the most important aspects of Anglo American’s responsibilities about contractor social performance management. This can be done through one or more of the following, depending on the associated potential risks and impacts and their severity:

- Timely resolution of non-compliances or other issues is required, and additional reporting and/or monitoring may be needed to follow up on their close-out. A failure to act, unsatisfactory management of social performance issues, or ignoring notices and warnings should merit a decision for the contractor to stop work until the issues are resolved.

- Regular progress meetings: As part of the regular progress meetings with the contractor, social performance issues must be discussed, including upcoming and past activities and progress in relation to social performance measures.

- Reporting: Contractors must report on their social performance at an agreed frequency and as per the KPIs and other reporting requirements outlined in the contract and in the CSMP. Examples of KPIs and other reporting requirements for social performance can be found in Box 4B.9.

- Audits and inspections: Audits and inspections can be announced as appropriate. Audits and inspections should focus on verification and validation of implementation of social performance requirements, as stipulated in the contract. This typically includes record checks, and visits to offices and worker accommodation. The frequency of audits and inspections should be commensurate with the associated potential social and human rights impacts and risks in relation to the scope of work.
Local employment:
- performance and progress against set objectives or targets
- the number and percentage of workers, indication of origin (expatriate, local, non-local nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management)

Local procurement:
- performance and progress against local procurement targets
- number of local companies recruited as sub-contractors
- payment-status reports
- number and location of local suppliers
- value of locally procured goods and services

Worker grievances:
- number of new grievances received, broken down by topic, actions taken to resolve issues, percentage of grievances closed-out as per policy, number and type of repeat grievances
- unresolved and still outstanding grievances

External grievances related to contractor SoW:
- number of new grievances received, broken down by topic, actions taken to resolve issues, percentage of grievances closed-out as per policy, percentage of grievances resolved to a satisfactory level, number and type of repeat grievances
- unresolved and still outstanding grievances

Incidents related to contractor SoW:
- number of incidents related to contractor activities, topic of incidents, root-cause analysis, and actions taken to prevent incident from happening again in the future

Off-site activities and impacts:
- details of any work outside site boundaries
- description of any potential off-site impacts (previously identified or not) and actions taken to prevent negative impacts

Social performance staffing:
- any new hires and departures, and listing of current staff working on social performance issues

Training:
- performance and progress against training plan

Worker accommodation:
- results of inspections and audits of accommodation conducted by the contractor or by third parties (including authorities), including date, inspector or auditor name, sites visited, records reviewed, major findings, and actions taken

Labour inspections:
- results and inspections of labour-related issues conducted by the contractor or by third parties (including authorities), including date, inspector or auditor name, sites visited, records reviewed, major findings, and actions taken
Other potential social and human rights impacts and risks
progress and evidence of implementation of any plans submitted by the contractor relating to social management.

Some social and human rights impacts and risks may have an environmental or other non-social cause, such as those social and human rights impacts and risks related to hazardous-materials spills, water management, vehicles using public roads, and the generation of dust, noise and vibration. Monitoring of implementation of requirements in relation to these risks and impacts is typically covered by the team.

Review of effectiveness of contractor social management

The site’s social performance team should assess whether the approach to contractor social management is effective, and take corrective action as required. This should include a review of:

- Contractor inspections, audits, and validation and verification of the implementation of contractor social performance requirements.
- The categories for social materiality and whether these are correctly defined.
- Whether potential social and human rights impacts and risks associated with the contract were adequately assessed.
- Whether the mitigation measures, controls, and other requirements were effective in managing potential social and human rights impacts and risks.
- Incidents and grievances related to contractor activities, whether these were resolved effectively, and whether the issues were adequately identified/updated in the process.
- Whether contractual language adequately covered social performance issues, and whether the contract was effectively enforced.
A review to ensure that contract terms regarding social performance have been met must be conducted, and any discrepancies or gaps must be addressed before the C(S)MP is signed off as completed. In particular, all commitments the contractor is responsible for implementing must be closed-out. All grievances and incidents in which the contractor is involved must be closed-out and associated corrective measures should be completed. The close-out meeting should include lessons learned and opportunities for improvement regarding social performance management.
The level of human and financial resources allocated to contractor social management and the departments involved depends on the type and severity of the potential social and human rights impacts and risks associated with a contract. Contracts require a more intense level of involvement of the social performance team than a transportation contract, for example.

For high-risk contracts, the social performance manager should participate in risk, impacts and opportunities identification; developing tender documentation and questions; assuring that social performance is appropriately weighted in the bid evaluation, assessing bids, developing and reviewing contract content; developing and approving the; and monitoring the implementation of social performance requirements.

The risk-assessment and sourcing process of contracts with less complex potential social and human rights impacts and risks, for example those where potential social and human rights impacts and risks have environmental and/or technical causes, can follow a more standardised approach that may not require significant involvement of the social performance team.

Responsibilities of the social performance team in labour-related issues in the supply chain differ by site. It is important that responsibilities are clarified to ensure effective coverage of labour-related issues in the sourcing process, contractual language, and monitoring of contract implementation. For example, the social performance team is typically not responsible for procuring local goods and services or for hiring local contractor workers. However, the criteria for what 'local' means and/or targets for local hiring can be developed by or in co-ordination with social performance teams, and subsequently used by the human resources and supply chain teams for the site's hiring, sourcing, monitoring, and auditing processes.

Table 4B.3 outlines what roles and responsibilities in contractor social management typically look like; these, however, may differ by site.

<table>
<thead>
<tr>
<th>Role/Responsibility</th>
<th>EPCM</th>
<th>CSMP</th>
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<tbody>
<tr>
<td>Management and resource allocation</td>
<td></td>
<td></td>
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<tr>
<td>Risk assessment and sourcing process</td>
<td></td>
<td></td>
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<tr>
<td>Labour-related issues</td>
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</table>

Responsibilities of the social performance team in labour-related issues in the supply chain differ by site.
Provide advice and support on how to meet required standards and international practice.

Provide advice and support to ensure alignment with Supply Chain standards and processes.

Escalation point for contract related grievances and incidents in the supply chain as required.

Ensure contractor social management learnings are effectively communicated across the BU portfolio.

Develop site-specific criteria for socially material contracts.

Screen for social materiality, as required.

Input into the contractor social management process as required and depending on the scope of the contract and/or its associated potential social and human rights impacts and risks. Input may include: screen for social materiality, assessing potential social and human rights impacts and risks associated with the contract, defining specific social performance requirements for the scope of work, preparing tender documentation, specifying social and other requirements to be included in contracts, developing and/or approving the contract, contractor pre-mobilisation checking for social performance issues, contributing to contractor engagements and audits, and assisting in the closure of contracts.

KPIs

Provide advice and guidance to the company representative appointed to govern the contractor relationship, as well as to the end-user and to the contractor and their staff, on social performance requirements and expectations as required.

Participate in incident investigations as required.

Investigate grievances related to contractors as required.

Develop definitions, criteria and/or targets for local procurement and local hiring.

Screen for social materiality, as required.

Prioritise local procurement.

Monitor local procurement in the supply chain as required.

Conduct local-procurement-related audits of the supply chain.

Investigate local-procurement-related grievances and incidents in the supply chain as required.

Negotiate contractual requirements with contractors.

Site contractor management procedures developed and implemented in a manner consistent with applicable legislation and this guidance.

Develop contractual requirements.

Assess labour-related risks and impacts in the supply chain as required.

Develop requirements and contractual language for labour-related issues in the supply chain.

Monitor local hiring in the supply chain as required.

Conduct labour-related audits of the supply chain.

Investigate labour-related grievances and incidents in the supply chain as required.

Develop contractual requirements for security contractors.

Monitor security-related contractual requirements.
Investigate security-related incidents and grievances as required.

Develop contractual requirements for issues.

Monitor-related contractual requirements.

Investigate-related incidents and grievances as required.

Ensure that all individuals involved in contractor social management are properly trained, competent, and resourced to effectively carry out their respective roles.

Ensure that contractor social management is regularly audited for compliance with legal requirements and this guideline.

Ensure that technical specifications related to contractor requirements are provided to supply chain.

Define performance requirements of contractors to supply chain.

Support potential pre-tender briefings.

Support performance monitoring of selected contractors.

Ensure contractual obligations are implemented.

Day-to-day management of the contractor relationship on site and adherence to the defined requirements and which may relate to social performance.

Monitor contractor performance and ensure that any non-conformances or non-compliances are managed and addressed. This may include social performance issues.

Ensure contractors have all the required permits and authorisations to complete their work and activities.
4B.4 Tools

Contents in this section:

4B.1 Introduction
4B.2 Guidance
4B.3 Management and resources
4B.4 Tools

4. IMPACT AND RISK PREVENTION AND MANAGEMENT
4B Contractor Social Management
About Community Health and Safety (CHS)

This section provides guidance on managing community health and safety (CHS) impacts and risks. Proper identification, analysis and management of CHS can contribute towards:

- Avoiding and minimising adverse environmental and human rights impacts, including current and future impacts.
- Avoiding and minimising risks, including current and future risks.
- Providing a transparent and reliable approach to planning and funding community health systems strengthening, including infrastructure and programmes (in support of the Sustainable Mining Plan commitments).
- Building trust and confidence with local stakeholders.
- Improving the health and well-being of potentially affected stakeholders in a sustainable manner.

There are several good international industry practice (GIIP) guidelines that support an approach to evaluating community health impacts linked to development projects. The 2012 version of the IFC Performance Standard 4 is regarded as the benchmark for community health safety and security, with the 2009 guidance note 'Introduction to Health Impact Assessment' as a reliable approach and method.

IFC Performance Standard 4 requires sites to evaluate the risks and impacts to the health and safety of affected communities (giving particular attention to vulnerable populations) arising from site-related activities during the entire project lifecycle, and to establish preventive and control measures consistent with this. The site will identify risks and impacts and propose mitigation measures that are commensurate with their nature and magnitude, with avoidance prevention measures favoured over reduction.

Site activities to be evaluated include, but are not limited to:
- Infrastructure and equipment design and safety; e.g. tailings dams, natural hazards, etc.

Box 4C.1 International standards – IFC Performance Standard 4
traffic and road safety.

- Community exposure to hazardous materials and substances released by the site or transported to the site.
- Community exposure to communicable or non-communicable disease, especially from temporary or permanent project labour.
- Impacts to ecosystem services which directly affect health and safety, e.g. loss of vegetation that mitigates the effect of landslides or flooding, or reduction in water availability essential for growing certain traditional staple foods, or indirectly through climate change.

This section is aligned with the International Finance Corporation Performance Standards (PS) on Environmental and Social Sustainability (IFC PS, 2012) and specifically PS 4 (Box 4C.1) as this relates to Community Health, Safety and Security. However, it has a clear overlap into other PSs, including:

1. Assessment and Management of Environmental and Social Risks and Impacts,
2. Labour and Working Conditions,
3. Resource Efficiency and Pollution Prevention,
4. Land Acquisition and Involuntary Resettlement,
5. Biodiversity Conservation and Sustainable Management of Living Natural Resources,
6. Indigenous Peoples,
7. Cultural Heritage.

This section also aligns with the United Nations Guiding Principles (UNGPs), recognising health as an international human right, aimed at ensuring that everyone, including vulnerable groups, can enjoy the highest attainable level of health and well-being.

Specifically, this section highlights core concepts and principles.

CHS presents a methodological approach to assess and address potential impacts and risks following a standardised Health Impact Assessment (HIA) approach, including reference tools and resources.

CHS provides a framework to establish an appropriate health external context review that supports the evidence for the impact and risk assessment, as well as future monitoring and evaluation activities.

CHS provides a method to link the assessment of impacts and risks to the Way and socio-economic development (SED) so that health is integrated as part of cross-functional assessments and related environmental and social management plans.

CHS describes the synergies and inter-connectedness between existing Anglo American policies and commitments, including the Safety, Health and Environment (SHE) Way; the Sustainable Mining Plan; the vision of zero harm; and integrated standards related to Environmental, Social and Health Impact Assessment.

CHS guides the development of a management plan and related monitoring and evaluation processes as part of impact and risk management.

CHS provides considerations for stakeholder engagement on issues.

CHS details the external partnerships required, as well as the internal co-ordination and cross-functional collaboration needed.
Community health and safety is everyone's responsibility, particularly the site management team. Community health impacts associated with mining can stem from multiple sources and all those working on site should strive towards the same goal of safeguarding the asset, the workers and potentially affected external stakeholders.

The primary responsibility for identification and assessment of impacts and risks, and development, implementation and co-ordination of management plans (including external context reviews), rests with the site Social Performance and Safety, Health and Environment (SHE) teams.

There is also a link to the Sustainable Mining Plan and specifically, the Thriving Communities stretch goals that includes the element of health and well-being; therefore, cross-functional collaboration is important. The link to is discussed below and, while approaches and methods may differ, opportunities to integrate community health initiatives should always be considered.

Relevance to other sections

In addition to this section, community health and safety management is supported by other guidance in the Social Way toolkit.

- Governance (Section 1): Section 1 provides guidance on social performance management and resourcing, including in relation to . It also details the requirement to establish a Social Performance Management Committee (SPMC). The SPMC is the primary vehicle for ensuring cross-functional collaboration in developing, implementing and monitoring the management plan.

- Review and Planning (Section 2): Social Performance planning – sites' internal and external context review and vulnerability assessments provide information critical to . The internal context review will provide important information about all site activities and infrastructure, including ancillary features (such as transmission lines, roads, rail lines) that must be considered when assessing potential impacts and risks. The internal and external context will be considered throughout the impact assessment process, with a specific emphasis on scoping to determine potential health impact areas of concern, and again at the impact-assessment phase. Any material changes in either the internal and external context will need to be continually evaluated and, as required, the Social and Human Rights impact and Risk Analysis (SHIRA) should be updated to include these elements.

- Engagement and Assessment (Section 3): Stakeholder engagement – in order to properly assess and manage impacts and risks, it is necessary to involve appropriate external stakeholders, including local and national authorities, relevant institutions and affected communities. The process outlined in this section should be incorporated into sites' Stakeholder Engagement Plans (SEPs).

- Incident and Grievance management – incidents and grievances are a critical tool in tracking and improving a site's impact assessment, management, and performance.
Definitions

Social and Human Rights Impact and Risk Analysis (SHIRA) – the potential adverse impacts on stakeholders and risks to the business should be tracked through sites' processes. Information about other types of potential human rights impacts in and associated mitigations may also be relevant for community health.

Socio-economic Development (SED) Planning (4A) – a number of health determinants are included in the model of Thriving Communities, including community health and well-being under the living condition theme. The information and analysis developed through this section should inform planning and setting of priorities as it seeks to identify opportunities to enhance or optimise potential beneficial impacts that may be associated with the development or operation of the site.

Contractor Management (4B) – various contractor activities may have an impact on and contracts should specify the controls and requirements needed to prevent or minimise these impacts. Examples of potential impacts and risks associated with contractor activities are summarised in 4C Guidance Note 3.

Emergency Preparedness and Response Planning (4D) – local capacity for emergency preparedness should be screened through a health lens. Guidance and requirements to safeguard in emergency situations through emergency preparedness and response planning are outlined in section 4D.

Security Management and the Voluntary Principles on Security and Human Rights (4E) – potential-related risks and impacts linked to a site's security arrangement should be assessed and managed in accordance with the Voluntary Principles on Security and Human Rights (VPSHRs).

Land Access, Displacement and Resettlement (4F) – displacement and resettlement can have impacts on affected stakeholders' health and mental well-being and can make stakeholders more vulnerable to other impacts. Examples of potential impacts and risks that may be associated with physical displacement and economic resettlement are summarised in 4C Guidance Note 4.

Site-induced Migration (4G) – site-induced migration (SIM) can be a source of several impacts. Examples of potential impacts and risks that may be associated with SIM are summarised in 4C Guidance Note 5.

Cultural Heritage (4H) – the value of cultural heritage resources, traditions and practices, including traditional medicine practices, should be understood and any potential impacts managed.

Indigenous Peoples (4I) – potential impacts related to Indigenous Peoples need to be understood in the context of such peoples' unique past and current cultures, rights, traditions and experiences. Given these unique circumstances, several specific determinants may influence health outcomes of indigenous groups compared to non-indigenous people. For example, access to traditional food, spirituality, ceremonies and traditional teaching, access to traditional territory, and engagement in traditional practices.

Artisanal and Small-scale Mining (4K) – the presence of artisanal and small-scale mining (ASM) can affect, as this activity may increase stakeholder vulnerabilities to certain health outcomes. In addition, loss of the ability to practise as a form of livelihood as a direct consequence of physical displacement or land clearing may have significant social and economic (including health) consequences.
Determinants of health
The range of personal, social, economic, and environmental factors that influence health status.

Direct health impact effect
A direct (primary) effect demonstrates a specific cause-and-effect relationship caused by an action occurring at the same time and place (e.g. traffic accident with a site vehicle or emissions from a site process affecting air quality).

Equity in health
Refers to fair, just and unavoidable differences in exposure to health risk factors and status, among groups of people. As an example, significant differences in mortality or environmental risk exposure between low- and high-income groups would be considered unfair and avoidable, and therefore considered an equity challenge.

Good international industry practice (GIIP)
Means standards, practices, methods and procedures conforming to local legislation/regulations and the exercise of the degree of skill and care, diligence, prudence and foresight which would reasonably and ordinarily be expected from a skilled and experienced person or body engaged within the relevant industry or business sector.

Health indicator
Is a characteristic of an individual, population, or environment which is subject to measurement (directly or indirectly) and can be used to describe one or more aspects of the health of an individual or population (quality, quantity and time).

Health inequality
Refers to descriptive measures of difference in exposure to health risk factors, and to differences in health status between groups of people.

Health need (and opportunities) assessment
A community health needs assessment involves a systematic review of the current health issues faced by a population, with the outputs leading to agreed priorities, and development of strategies to direct resource allocation with the aim of addressing identified community health needs, improving health outcomes and reducing inequalities. The process involves the community and collaborative participation.

Health outcome
A change in the health status of an individual, group or population which is attributable to a planned intervention or series of interventions, regardless of whether such an intervention was intended to change health status.

Health sector
Consists of organised public and private health services, health departments and ministries, health-related non-government organisations (NGOs), community groups and professional associations.

Health status
Is a description and/or measurement of the health of an individual or population at a particular point in time against identifiable standards, usually by reference to health indicators.

Indirect health impact effect
An indirect effect is a secondary by-product (removed by distance or caused by an action occurring later in time) of an interaction among multiple variables and may be a consequence of a direct effect (e.g. site induced in-migration and pressure on basic services, transmission of communicable diseases, or change in traditional values due to resettlement).

Potentially affected stakeholder
In the context of community health and safety, the term potentially affected community is often used instead of the more generalised term potentially affected stakeholder.

For the purposes of completeness, the term potentially affected community(ies) generally describes a community (e.g. town(s), village(s) or group of settlements) within a clear geographical boundary where site-related health impacts may reasonably be expected to occur. Potentially affected communities are inherently prospective and simply represent best professional judgments, with the potential that these may change over time. These communities may be affected by impacts that can be direct (communities affected by proximity and operations of the project), indirect (e.g. influenced by transport routes, local economic changes and changes in culture and lifestyles), or cumulative impacts. Potentially affected communities may be classified collectively based on the homogeneity of their impacts/risks.

Sensitive receptor
Sensitive receptors are people or communities that may have a significantly increased sensitivity or exposure to contaminants by virtue of their age and health (e.g. schools, day care centres, hospitals, nursing homes), proximity to source of exposure or contamination (noise, air quality), or the facilities they use (e.g. water supply). The location of sensitive receptors must be identified in order to evaluate the potential impact of the contamination on public health and the environment.

World Health Organization (WHO)
The WHO SARA is a health facility assessment tool using a set of tracer indicators designed to assess and monitor the service availability and readiness of the health sector and to generate evidence to support the planning and managing of a health system. The objective is to generate reliable and regular information on service delivery (such as the availability of key human and infrastructure resources), on the availability of basic equipment, basic amenities, essential medicines,
Service Availability and Readiness Assessment (SARA) Tool and diagnostic capacities, and on the readiness of health facilities to provide basic healthcare interventions relating to family planning, child health services, basic and comprehensive emergency obstetric care, HIV, TB, malaria, and non-communicable diseases. In addition to the SARA assessments, specific guidance on health capacity assessments to respond to emergencies in case of site-induced migration are published by the WHO. As required, these can be adapted to consider other health service indicators such as the ability to manage trauma cases either through effective in-transit stabilisation, definitive care and referral care.

The right to health is a human right. In line with the Way, the fundamental objectives of management are to achieve zero harm from site-related impacts, to manage risks to the site operations and to improve overall community health and well-being.

Effective management embraces the workforce and local communities as integral parts of a system that is dynamic, responsive to changing contexts, and allows for transparency and accountability.

Core community health concepts and principles

Understanding the following concepts will support a broadened and deeper understanding of SHE.

- The concept of health
- Health Impact Assessment (HIA)
- Key community health and safety areas
- Determinants of health and health outcomes
- International guidance and national regulations/legislation
- Key considerations in assessing and managing risks and impacts
- Lifecycle planning
- The inter-connectedness of community and workforce health
- The inter-connectedness of management and health and wellness as part of socio-economic development (SED)
The World Health Organization (WHO) defines health as: “A state of complete physical and mental and social well-being and not purely the presence or absence of disease,” and “the extent to which an individual or a group is able, on the one hand, to realise aspirations and to satisfy needs, and on the other, to change or cope with the environment.”

Achieving good health also implies that people are safe. Unless stated otherwise, this tool uses the term “health” as encompassing issues. Community health is highly dependent on context and can differ across geographical landscapes. Different communities and cultures might give importance to diverse aspects of health and well-being.

Health impact assessment (HIA)

The International Association of Impact Assessment (IAIA) defines health impact assessment (HIA) as a combination of procedures, methods and tools that systematically judges the potential, and sometimes unintended, effects of a project, programme, plan, policy or strategy on the health of a population, and the distribution of those effects within the population. HIA is the required methodology in identifying, analysing and managing risks and impacts, with the approach focused on a mining project or operating site, and not on methods that consider policies or plans.

HIA is a structured planning and decision-making process using a variety of evidence sources for the identification and analysis of impacts and risks, with the objective to produce prevention and management measures that are technically sound, socially acceptable, practically achievable and economically feasible (broadly ‘fit for purpose’). These management measures (aimed to protect and promote health) are presented in a structured Community Health and Safety Management Plan (CHSMP), which is supported by an associated monitoring and evaluation process to evaluate changes in health indicators and adjust interventions as appropriate.

As HIA considers the ways in which a site or project may create health hazards and associated health impacts, as well as health promoters and associated health opportunities, it has application to both the analysis of negative impacts and risks but also on opportunities for socio-economic development associated with (see Section 4A and as discussed later).

While an HIA can be a separate stand-alone process, it is generally more efficient when integrated with the assessment of other impacts and risks as part of a multi-disciplinary approach (such as Environmental Impact Assessments or Social Impact Assessments), as similar methodological steps are followed, with potential benefit to:

- Avoid duplications and minimise overlaps (for example, combined stakeholder engagement activities, reduce survey fatigue in data-collection efforts, etc.).
- Reduce costs and improve efficiency.
- Consider the interlinkages between bio-physical (environmental) and socio-economic determinants, especially in the collection of data and analysis of impacts and risks. For instance, baseline environmental health data such as water and air quality collected by the environmental team is utilised in the HIA, thus avoiding duplication of effort.
- Integrate management interventions by limiting siloed approaches.
- Develop a unified social (including CHS) management plan and/or environmental management plan that consider management measures and integrates the monitoring and evaluation system.
potentially cause significant adverse social impacts and/or risks that are diverse, irreversible, or unprecedented, the determination of the level or type of required for a site is generally defined at scoping. Importantly, not all sites require a comprehensive assessment with extensive data collection or stakeholder engagement, with this decision process described under the guidance section (see Section 4C.2 Task 1 and Guidance Note 4C.1) considering the potential health impacts, social sensitivities and project footprint as outlined in Figure 4C.1.

Finally, the process relies heavily on inputs from external stakeholders (with health authorities, health experts, social workers, local communities, etc.). External stakeholder engagement supports the participatory process of and promotes inclusive decision-making based on presented evidence if there is transparent and open consultation.

Key community health and safety areas (CHSAs)

To ensure that assessments follow a systematic approach in considering relevant/appropriate topics, a standardised methodological process should be followed that considers 12 areas, termed community health and safety areas (CHSAs). This approach is aligned to the Environmental Health Area method as described in both the International Finance Corporation (IFC) Introduction to Health Impact Assessment (2009) and the International Association of Oil and Gas Producers Health Impact Assessment guide for the oil and gas industry (2016), considered as reference.
This method considers both environmental and social determinants of health, as well as different pathways where outcomes may be influenced by direct and indirect site-related activities, which ultimately supports an integrated and holistic consideration of various topics. Various health determinants and health outcomes are described in more detail below, with the 12 outlined in Table 4C.1 and a more detailed description in Tool 4C.2. Notably, 9 and 10 relate to environmental and socio-economic determinants of health, with overlaps into the biophysical and external social context and how these could be affected by site-related activities.

It is recommended that the approach be used for Tasks 1-3 (scoping, baseline health data collection, and impact/risk assessment) as described in the guidance section, to ensure that a systematic process is followed, and that all topics are scoped in at these stages. However, to support the cross-cutting nature of prevention and mitigation measures, the are typically separated into thematic areas as part of the Community Health and Safety Management Plan.

Table 4C.1 Community health and safety areas

<table>
<thead>
<tr>
<th>Community health and safety areas (CHSAs)</th>
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<tbody>
<tr>
<td>Communicable diseases linked to the living environment and housing</td>
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<td>Vector-related diseases</td>
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<td>Soil-, water- and waste-related diseases</td>
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<td>Health-seeking behaviours and cultural health practices</td>
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</tbody>
</table>

The methodology is supported by the concept of determinants of health, which are factors that may influence, or be influenced by, health outcomes, and can be seen as the drivers of good or poor health and well-being for a given population. As described in Box 4C.3, determinants of health can be categorised specifically to a person's individual characteristics and behaviours, while others are more collective in nature and include the socio-economic as well as bio-physical environment. Key bio-physical (environmental), social and health determinants and their inter-relationships are presented in Figure 4C.2, demonstrating complex overlaps and the need for a 'simpler' or more systematic approach to considering health topics as presented in the approach (Table 4C.1). Notwithstanding the approach, these determinants are especially important to consider, as they represent the 'causes of the causes' and are important in affecting or influencing disease profiles and health outcomes. In addition, they have a clear overlap to the elements presented in section 4A, with the interconnectedness in data-collection approaches between an and an described below. The good-practice guidance on HIA (2009) developed by the International Council on Mining & Metals (ICMM) provides, in chapter 1.2, a detailed description of the impacts of mining projects on the various determinants of health.
Individual determinants of health

Environmental determinants of health

Socio-economic determinants of health

Age
Gender
Ethnicity
Genetics
Income, employment and economy
Education and learning
Social status
Health status
Lifestyle, including substance abuse
Diet and nutrition status
Health and risk-taking behaviour
Coping skills

State of the physical environment (built or natural), including aspects such as traffic, housing/shelter, ecosystems services, agriculture/food supply, water supply and sanitation

Exposure to environmental or physical hazards, including waste management

Exposure to hazardous substances

Transport and connectivity

Employment and working conditions
Livelihoods and local economy
Access to goods and services
Affordability of goods and services
Culture, customs, faith and traditions
Institutional capacity of health and other public services (police, justice, social care)
War and conflict (safety/security)
Social and community cohesion

Box 4C.3 Examples of determinants of health

There is the potential that could follow a biomedical or health-outcome approach that purely considers disease or illness and related causal mechanisms. The focus of this approach may be excessively concentrated on disease processes and rates of disease, and neglect the cause, or contributing factors that influence or affect disease rates (the determinants of health; i.e. the 'causes of the causes'). The approach gives due consideration to health outcomes, as well as related health determinants, in considering potential changes in the health status of communities or groups within the potentially affected stakeholders which are attributable, directly or indirectly, to site-related activities. Health outcomes are generally categorised into five broad categories:

- Infectious or communicable diseases, including vector-borne (malaria, dengue); water-borne (diarrhoeal, typhoid, cholera); sexually transmitted (HIV, syphilis); zoonotic (infections that can be passed between animals to humans e.g. Ebola, Covid-19); and respiratory/droplet transmitted conditions (TB, influenza, meningitis).
- Non-communicable diseases, including cardiovascular disease, diabetes, chronic lung disease and cancer.
- Nutritional disorders, including undernourishment, obesity, vitamin disorders or micronutrient deficiencies.
- Physical injuries, including road traffic accidents, failure of equipment or infrastructure (e.g. tailings storage facilities), drowning, non-accidental injury (assault), etc.
- Mental health and well-being, including stress and loss that may be associated with physical resettlement, financial stress, noise associated with a project, etc.
International guidance and national regulations/legislation

National laws regarding the consideration of impacts/risks from mining sites can be extremely variable and are often included in the regulatory framework typically addressed by the environmental and social impact assessment process, Environmental Management Act or equivalent. The detail on methodology and expected outputs in these regulations may be limited; as a result, merely following local legislation and permitting processes may not be sufficient to adequately manage impacts and risk related to [specific contexts]. In addition, there is often inadequate alignment and integration between the various ministries in host governments to ensure that impacts are effectively addressed as part of the mandated Environmental Impact Assessment (EIA) process. Conversely, national regulations and legislation may prescribe methodological steps that need to be aligned with the tasks described in this section.

Country-specific guidance is available for Australia, Canada, Brazil and other jurisdictions, but where these are not available it is recommended to follow guidelines, fully aligned to the standards described in this section, including:

Chapter 3.3 of the standard for responsible mining (June 2018) addresses community health and safety under the social responsibility section. This current 4C toolkit substantially meets the requirements outlined in, but special note is taken of the specific provisions on HIV/AIDS, TB, malaria, and other emerging infectious diseases in section 3.3.4 of the standard. If the area method (see Table 4C.1 and Tool 4C.2) is followed in the recommended systematic fashion, it is anticipated that these communicable disease threats will be identified at the scoping phase and be subject to adequate baseline data collection so that evidence-based impact and risk assessments can be performed, and effective management measures proposed.

Box 4C.4 Initiative for Responsible Mining Assurance (IRMA)

Key considerations in assessing or managing risks and impacts
To effectively understand and manage impacts and risks, the following are important to note:

Health inequality and health inequity
Health inequalities are differences in health status or in the distribution of health determinants between different population groups. Some health inequalities are attributable to biological variations or free choice, and others are attributable to the external environment and conditions mainly outside the control of the individuals concerned. In the latter, health inequalities may also lead to health inequities, where equity in health refers to fair, just and unavoidable differences in exposure to health-risk factors and status, among groups of people. As an example, significant differences in mortality or environmental risk exposure between low and high-income groups would be considered unfair and avoidable, and therefore considered an equity challenge.

This is important, as a site can cause “hidden costs” on affected communities and the health system at large in the form of an increased burden of disease and reduced well-being. The adverse health effects are often experienced most by groups that are vulnerable. As an example, loss of land, pollution of various sources (especially water and air), and inflation (food and basic services) may disproportionally affect those suffering from poverty or those with pre-existing diseases. However, extended benefits supported by company-sponsored health programmes can bring about more significant improvements in vulnerable populations or groups as their needs may be so much higher; but this depends on the appropriate recognition, targeting and successful implementation of interventions.

Task 5 in Section 2 (Review and Planning) outlines systemic vulnerabilities in detail with the presentation of five capitals. It is essential that the process consider these vulnerabilities to evaluate vulnerable groups and assess potential inequalities that may emerge or increase in relation to site-based activities.

Privacy and protection of health data
Health data is privileged and the privacy and protection of information about people and their health status must be ensured. Maintaining identifying health information of community members can bring discriminatory harm to...
individuals if mishandled. Self-reported health status data also requires sensitivity. This information, if collected, should be anonymised, with restricted access. Data protection and privacy considerations within Anglo American are described in Box 4C.5, and these will be expanded in the baseline data collection section related to ethics of data collection and management as described in Box 4C.8.

Working with local authorities

Local health authorities should be viewed as long-term partners with deep insight, knowledge, and expertise on community health and how health determinants affect health outcomes at the local level (the 'causes of the causes'). Local health authorities are often the most trusted and influential stakeholders in a local community. A good relationship with community health workers, local doctors, nurses, hospital administrators and other allied health-related professionals (emergency-response professionals, etc.) and non-health professionals (police, social workers) helps ensure collaboration to implement joint actions and approaches required to safeguard and promote community health and safety. In many cases, local authorities have insight into health information not captured by other data (participatory data); for example, they may have knowledge of an influence on health outcomes that should be considered (e.g. increased disposable income leading to an increase in drug use, use of traditional medicine as a preference in care-seeking behaviour). Ideally, as part of stakeholder engagement, a site should collaborate with local authorities to complete relevant health assessment work, request access to primary and secondary data, assist in the implementation of mitigation measures, and play an essential role in monitoring and evaluation activities.

Engaging local institutions in assessment and interventions

When considering potential community health and safety partners for assessments and intervention, sites should try to engage with local academic institutions or local NGOs, as these are often experts in local data collection and analysis, can provide human resources to undertake larger surveys, and can help ensure that health strategies appropriate to the local context are developed. Collaborating locally can also strengthen regional capacity to address certain issues.

In addition, sites should look for local implementation partners that have the correct skills and capacity to support the design, implementation and monitoring of certain health interventions. In the absence of suitable local implementation partners there should be a strong focus on building local capacity if external resources are required. The intent should be to create some degree of separation and limit the company from being entangled in the delivery of public health services, even through health system strengthening activities.

Any personal data must be managed in accordance with the Anglo American Group Data Privacy Policy. Data must be processed:

- Appropriately: only process data when we have a lawful reason to do so; take extra care with very sensitive data; recognise and respect the rights of the people (data subjects) whose information we hold.

- Transparently: we must tell individuals when we are collecting their data and what we are going to do with it; and we can only use personal data for the purpose for which it was intended. If we want to use it for something else, then we need to go back to the 'data subject' and tell them.

- Securely: We must protect personal data from harm, whether accidental or malicious loss, destruction, damage and unauthorised disclosure. If there is a breach, then we must act quickly, and report it to dataprotection@angloamerican.com immediately. We must not share personal data with anyone, unless this is deemed necessary. If it is, we must make sure the person or organisation we are sharing it with will give it the same protection we do. If it is with an external party, a data-sharing agreement may be needed.

- Responsibly: We must only collect and use the personal data we need. If it does not help to achieve our
intended business objective, then it is off limits. We must make sure the personal data we process is accurate and kept up to date. We cannot keep hold of personal data forever. We can only store and process it for as long as it is required, and then delete it.

Lifecycle planning

The process is flexible and can be used at any stage of a project/site lifecycle (from Discovery to feasibility, development and construction, site operations or as part of a modification of an existing activity) to anticipate impacts/risks, appraise a past event or to support planning for closure and social transition. The process should consider various lifecycle stages when assessing potential impacts or recommending associated management measures; for example, impacts and management controls may be different in construction compared with operations (e.g. owing to the presence of a construction workforce) and some controls may need to extend into the post-closure phase in order to address impacts that may only become apparent at that stage (e.g. tailings storage facilities and water-quality management).

An (the level discussed in Task 1 under guidance) or integrated study e.g. Environmental, Social and Health Impact Assessment (ESHIA) should be initiated as a scoping process as the site moves into the project stage. It should also be integrated into other relevant studies and plans as the site advances through project-study phases; for example, into feasibility assessments, resettlement and land-access planning (see Section 4F), and site-induced migration assessments (see Section 4G). Incorporating it into project planning as early as possible allows the project design to be adapted to avoid impacts (as the most effective control).

Construction activities and the presence of a large construction workforce are likely to present significant impacts and risks. Sufficient resourcing, including specialist expertise to manage certain issues, depending on context, should be planned for.

Once the site is operational, there should be regular review of impacts and risks and associated management plans. Significant changes in the internal or external context may trigger a need for a more in-depth health assessment, which may include updating or expanding the as applicable (see Figure 4C.1 and Guidance Note 4C.1 under scoping that outlines the various levels of).

During operations, actions needed to achieve desired long-term community and employee health outcomes post-mining (e.g. no residual risk of adverse health impacts, particularly those related to exposure to environmental hazards) should be included in relevant management plans (operational social management plans, the Management Plan, as well as Human Resources (HR) Plans), and in the social component of the Mine Closure Plan.

Community health and safety impacts related to social transition should be assessed either in a stand-alone or as part of an integrated . When sites are five years from planned closure and the results
A formal and documented mechanism must be established during social transition for following potentially affected stakeholders considered to be “at risk” (e.g. of exposure to environmental hazards) into the future, post-closure. This involves specific follow-up for exposure groups and general follow-up for the remainder of the affected community.

The interconnectedness of community and workforce health

Workplace health and safety and community health and safety are interconnected, with various health determinants potentially influencing or affecting health outcomes in both the community and the workplace. The term ‘health risks and impacts don’t respect the fence line’ is often used to demonstrate that activities in the workplace can influence community health and safety, and that prevailing diseases or health conditions in the community can influence worker health and safety. Some examples are demonstrated in Figure 4C.3, with an instance of an important cross-over consideration when workers act as transmission agents for potentially hazardous exposures (e.g. chemicals or infectious diseases) and potentially transmit the exposure effects from the workplace to the community. Notably, the workforce may originate from, live in or near a local community, use a local community’s social and health services, and spend recreational time in the area of influence.

The assessment methodology for workplace health and safety generally takes the form of a health-risk assessment that is captured into the workplace risk and controls register (WRAC) and defined by processes in Operational Risk Management (ORM) implemented by the occupational health and safety team. The health-risk assessment, or workplace health and safety risk assessment, is compared to the health-impact assessment process in 4C Tool 3, which includes a comparison between the assessment of potential community health impacts and the Sustainable Mining Plan Thriving Communities health and well-being stretch goal pillar (as discussed in the next section).
The inter-connectedness of community health and safety management and health and wellness as part of socio-economic development

Recognition of the interconnectedness and overlaps between this section and the Thriving Communities elements described in toolkit 4A is vital so that similarities in approach and outcomes can be maximised, while differing objectives can be separated. Importantly, while objectives may differ between the two processes, data-collection activities often share the same inputs and therefore integration opportunities may be possible.

Typically, an anticipates and identifies appropriate actions to prevent or mitigate negative health impacts and risks, as well as ways to enhance or promote health benefits or opportunities. However, as the Anglo American’s Social Way 3.0 process is focused on identifying potential negative impacts, the assessment as described in this toolkit has this objective in mind.

toolkit 4A seeks to evaluate opportunities to make lasting positive contributions to communities or regions where Anglo American operates that include health and well-being as a key element of the living condition category. Most elements described in the Thriving Community model (presented in Figure 4A.1) consider determinants of health presented in Box 4C.3, including housing, water and sanitation, energy, connectivity, social cohesion and food security, with an overlap to the as described in Tool 4C.2.

Even though the process can identify benefits, two separate methods are recommended:

1. The health risk assessment approach may also have some relevance; however, it is not included within this section and is not subject to Social Way guidance.

These three methods are described in detail in Tool 4C 3, with Figure 4C.4 outlining the various approaches, objectives and outcomes.

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**Key Points**

- Inter-connectedness of community health and safety management
- Health and wellness as part of socio-economic development
- Recognition of overlaps between sections
- Importance of maximizing similarities and separating differing objectives
- Integration opportunities through shared inputs in data-collection activities
- Anticipation of actions to prevent and mitigate negative health impacts
- Focus on potential negative impacts
- Toolkit 4A aims to evaluate lasting positive contributions
- Elements from Thriving Community model
- Overlap with health determinants
- Three methods described in Tool 4C 3

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**Diagram Description**

- **Workplace Health** and **Community Health** sections are linked.
- **PILLAR 1**: Health Risk Assessment
  - Methodology
  - Objective
  - Update WRAC Occupational health and safety
- **PILLAR 2**: Health Impact Assessment
  - Analysis of future community health impacts
- **PILLAR 3**: Health Needs & Opportunities Assessment
  - Analysis of existing community health needs
  - SED health and wellbeing management
FIGURE 4C.4 VARIOUS HEALTH ASSESSMENT APPROACHES


Anglo American's Social Way 3.0 follows the Plan Do Check Act (PDCA) management method. The tasks outlined in each stage of the cycle are not strictly chronological and may overlap. Risks and impacts can change over time, so risk and impact management must be dynamic and regularly reviewed. Engagement with a range of stakeholders is required across the cycle and should be aligned with activities conducted for other impact and risk assessment and management activities, in line with guidance in section 3A.

1. Define the appropriate approach through scoping
2. Review context (data collection)
3. Assessment of community health and safety risks and impacts

4. Update SHIRA
5. Develop a Community Health and Safety Management Plan
6. Provide workforce training

8. Adjust
9. Report
The tasks to support the assessment process are summarised in Figure 4C.5 and a process flow in Figure 4C.6 which provides the required linkages to a standard methodology and the cycle. A more detailed summary of these steps, the purpose/objectives, broad inputs and outputs, what resources may be required, and the general timeframes per task, is to be found in Tool 4C.4.

Use of consultants is described in section 1 and Tool 4C.5 describes considerations when engaging an external health impact assessment specialist/consultant.

As described in Section 2, community health and safety considerations are always screened into the Anglo American’s Social Way 3.0 assessment, as road traffic accidents and risks related to accidents and injuries represent a significant likely impact present at every site. Considerations related to assessing community safety elements linked to road safety should be addressed in the process under 7, but additional guidance for consideration in the baseline-data-collection efforts and design of management plans are discussed in 4C Guidance Note 6.
Plan stage includes a scoping process to define the approach and level of effort required to assess impacts and risks and to identify the kind of expert support needed, such as addressing data gaps and taking advantage of data-collection opportunities (Task 1). Projects/sites should then compile or obtain the required external context data (Task 2) and conduct the health impact and risk assessment (Task 3) and integrate the results into (Task 4) as part of the first stage of the DO cycle.

Planned and incremental stakeholder engagement (Section 3A) is crucial to achieve the objectives of management.

**Task 1 – Define the appropriate approach through scoping**

Identifying and managing impacts and risks can be a complex task because they are related to:

- Changes in the health determinants and health outcomes caused directly or indirectly by site activities
- The individual health determinants
- The external context.

Understanding the potential impact areas of concern that may be directly and indirectly associated with project/site activities in the area of influence (AOI).

**HIA**

**CHS**
The scoping process plays a central role in with the general method described in Figure 4C.7. The scoping process is informed by, expands on and feeds into the information collected and analysed as part of Section 2 Review and Planning and Section 3 Engagement and Analysis, which includes collecting data from both the internal and external context, assessing systemic vulnerability, defining the impact areas of concern, engaging with stakeholders, reviewing grievances/incidents and reviewing past or planned interventions and programmes. In addition, available information or data collected as part of Section 4 elements of the Social Way 3.0 may be relevant to consider as part of the scoping process; e.g. data collected as part of planning, assessment, Land Access Displacement and Resettlement (LADAR) assessment, etc.

Based on a review of the available information, the potential impact areas of concern are identified. An analysis of data gaps indicates what additional baseline data needs to be collected to provide a more detailed understanding of the context (task 2) before an evidence-based assessment of impacts and risks is undertaken (task 3). Data collection should be viewed as an ongoing process, from scoping to inform the impact and risk assessment and future monitoring and evaluation considerations. For areas for which sufficient information may be available, a preliminary assessment of impacts and risks should be undertaken using the approach described in Task 3.

Describing the prevailing health conditions in the external context (within the AOI) to determine systemic vulnerabilities.

Understanding what data is available on each area, what data gaps exist on the potential impact areas of concern and the opportunities for data-gap closure. This avoids collecting unnecessary data.

Outlining potentially affected stakeholders in the AOI.

Defining a consultation approach that avoids stakeholder fatigue or stress associated with over-consultation.

Recommending next steps in the process, including defining the level of required: desktop, rapid or comprehensive; stand-alone or integrated as part of a wider assessment.

Guidance on managing the scoping process is described in 4C Guidance Note 1, but broad principles for consideration include:

- **Inputs and resources:** Ideally, the scoping process should be managed internally. However, the available technical
The scoping process should be formally documented to support the preparation of the terms of reference, including the data collection, risk/impact assessment process and development of a management and monitoring plan. This can also be used to support the development of scopes of work if elements of these activities need to be outsourced.

Stakeholder engagement is a key component of scoping. The site Social Performance (SP) teams must retain a leading role in stakeholder engagement even if an external consultant is used to support different activities. The team will retain the responsibility for outlining current/future project/site activities and managing questions/requests for support so that any commitments are managed and recorded, as well as for understanding and managing any grievances/comments.

However, sites should consider whether it is appropriate for site staff to participate directly in certain engagements where an independent consultant may be better placed to conduct the engagement; for example, in key informant interviews or where there may be controversy regarding responsibility for certain health impacts. Notwithstanding this, opportunities should be created for the site staff and at least the lead to build relationships with health authorities, or to better understand issues that are emerging, and to build relationships that support future partnerships.

Sites should engage with institutions that can support health assessments or the provision of data/information; e.g. local health-service providers, government social agencies, emergency-preparedness and response bodies, as they can be valuable resources of information and can possibly be contracted to support data collection or other related activities on a consultancy basis. As data collection is an ongoing iterative process that continues through the baseline data collection, impact assessment and management plan phase, engagement at scoping will support and facilitate this.

Methods for data review that support the data-gap analysis and further health baseline-data-collection opportunities/requirements are discussed in the Tool 4C.7 and 4C Guidance Notes 1 and 2 (noting the overlap to Section 2 (Review and Planning) and Task 2).

The Sustainable Mining Plan stretch goal on Health and Well-being will contribute to achieving the Sustainable Development Goals (SDG) targets for health in our local communities by 2030. In 2019 and 2020, sites worked with a consortium led by the London School of Hygiene and Tropical Medicine to develop community health baseline assessments (applying a mixed-method approach using quantitative and qualitative data) and define prioritised strategies to achieve targets relevant to their context.

The scope of these baselines focuses on secondary information required to address certain targets, sometimes aggregated to the level of national or regional data. Nevertheless, the baselines are a good starting-point necessary to understand and manage site risks and impacts and should be taken into consideration as part of scoping (see 4C.2 Task 1).
the following considerations:

Refer to 4C Guidance Note 1 (Managing the scoping process) for practical guidance on undertaking the scoping process.

Not all sites require a comprehensive or a detailed or complicated baseline-data-collection effort. Determining the level of the (desktop, rapid or comprehensive) related to the factors described in 4C Guidance Note 1 (Managing the scoping process) will support decisions related to the effort that will be required, particularly in relation to the collection of new community-level data and the extent of external stakeholder engagement.

HIA For activities related to a site, e.g. a new project or site expansion, an HIA may be commissioned and integrated as part of environmental and social impact assessment (ESIA) work. HIA If work has already been completed that did not include an HIA, a stand-alone may be necessary to identify and assess impacts and risks. Importantly, do not need to be performed as part of an integrated assessment but are commonly performed in a stand-alone manner.

HIA CHS If little or no information is available on specific impact areas of concern, new studies on that topic may need to be conducted as part of the process, often including additional data collection.

HIA Where sufficient data is available, detailed studies may not be needed to assess impacts and risks, but more disaggregated data may still be needed for monitoring to confirm the level of impacts on different people or populations (including vulnerable groups).
As mentioned in Task 1, data collection is an iterative process, starting at scoping, and should be gradually completed and detailed as needed to allow for full assessment of impacts and risks, as well as future monitoring. Under this task, sites should focus on collecting data based on the gaps and issues identified in Task 1.

The main objective of data collection in this task is focused on gathering evidence to inform the impact and risk assessment, and not on monitoring recommended management or mitigation measures, as these are not clearly defined at this stage. It has been noted, however, that data collected can be used to support monitoring and evaluation efforts (Task 7), but as this may not be all-inclusive, or consistently the case, it is recommended that good baseline data is collected that informs both impacts and proposed interventions.

Data for CHS assessment purposes requires analysing the 12 approach as defined in Table 4C.1 and Tool 4C.2. Potential sources of data and some guiding principles are described in Tool 4C.7 and 4C Guidance Note 2, with potential key primary and secondary data sources summarised in Table 4C.2.

<table>
<thead>
<tr>
<th>Baseline health data collection and sources</th>
<th>( \text{Type of data} )</th>
<th>( \text{Source of data} )</th>
<th>( \text{Type of data} )</th>
<th>( \text{Source of data} )</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary data</td>
<td>Qualitative</td>
<td>Key informant interviews with broad range of stakeholders, including health authorities, local authorities, health development partners and community representatives.</td>
<td>Secondary data</td>
<td>Literature review of health data in public domain, including: Group meetings with local authorities, health workers, community health workers, communities, etc. Health data</td>
</tr>
<tr>
<td>Secondary data</td>
<td>Baseline health data</td>
<td>Health data</td>
<td>( \text{CI} )</td>
<td>Literature review of health data in public domain, including: Group meetings with local authorities, health workers, community health workers, communities, etc. Health data</td>
</tr>
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4. IMPACT AND RISK PREVENTION AND MANAGEMENT Plan
Baseline health data collection and sources

**Primary data**
- Focus group discussions with key sections of the community, including vulnerable groups.
- Social data
  - Health facility assessments (e.g. following the Service Availability and Readiness Assessment or similar)
- Environmental data
  - Direct visualisation of communities, prevailing environmental health and social challenges.
- Similar projects
  - Evaluating similar projects in similar settings and understanding their potential and actual impacts and what mitigation measures were applied.
- Stakeholder engagement and reports
  - Analysis of minutes or reports from stakeholder meetings.
- Data sources from social and environmental baselines and impact assessments.
  - Community grievance or concerns register.
  - Routine health information systems.

**Secondary data**
- Quantitative epidemiological cross-sectional baseline health surveys focused on specific objectives, potentially modelled on national level demographic/health surveys or similar cluster indicator studies.
- Stakeholder engagement and reports
  - Social baseline and impact assessment reports, as well as community development reports.
  - Other data such as traffic and crime reports.
- WHO Specialist bio-physical reports on aspects such as water and air quality.
- Environmental monitoring data on aspects such as water and air quality.
- Maps and spatial areas of influence.

**Primary data collection**
- Often sensitive in terms of ethical concerns. The site must consider the applicable regulations in its jurisdiction, as well as protocols on how data should be obtained, preserved, shared and reported (including informed consent, as applicable) before engaging in collecting information (see Box 4C.8).
- Data protection (Box 4C.5), as discussed earlier, must also be addressed. Vulnerable groups and gender must also be considered in data collection, as discussed in Box 4C.9.
- Depending on the scope of the data collection, large amounts of data may be collected. Sites are expected to plan how data will be documented, recorded and accessed. For example, using a database allows for effective organisation of data, facilitation of statistical analysis and, if possible, should allow for links to Geographic information system (GIS)-enabled data. The database should be structured to store health determinants and health-outcome data, ideally in a form that can be analysed and used to inform monitoring and evaluation activities using key indicators.
in some jurisdictions, health assessments may only be conducted by local authorities. Memoranda of Understanding (MoUs) can be developed with local authorities and should define the conditions under which local health data can be shared with sites and reported on.

In other jurisdictions, the collection of sensitive health data such as biological sampling (blood, hair, urine) needs to undergo ethical clearance. Engagement and partnership with experts such as recognised health-research institutions or university population health researchers is a good option to obtain ethical clearance.

Prior to primary health data collection, consent forms for participation need to be developed, which outline the ethical and legal requirements for data collection, data use, and measures to protect the privacy of participants. Forms must be reviewed and signed by all participants.
Task 3 – Assessment of community health and safety risks and impacts

This task identifies, analyses and ranks the potential impacts and risks that may be associated with a project/site, spatially at the level of potentially affected stakeholders and temporally through different lifecycle stages. The impact and risk assessment must respect available evidence and:

- Be performed at the appropriate level defined in the scoping phase (desk-based, rapid appraisal and comprehensive).
- Clearly identify the potentially affected stakeholders (sensitive receptors), including an accurate community profile and, if possible, quantified and geo-referenced.

Consider certain key elements that are described in the analysis (see section 3C), including:

- The future and current operational status of the project/site (e.g. move from surface to underground, feasibilities for expansion, etc.).
- Information on in the current, particularly specific progress to achieving long-term objectives related to , and any planned adjustments to improve progress.
- Review the effectiveness of existing controls. Importantly, these controls should be specific to identified impacts/risks and not just general community health interventions. However, certain interventions not targeted to the identified impact/risks may inadvertently, or indirectly, be effective in supporting a control and should therefore be considered in terms of their effectiveness.
- Any changes in the legal or regulatory framework related to .
Additional biophysical, socio-economic and health-related assessments that can contribute to completing an HIA include:

- Changes or anticipated changes to the local socio-economic conditions and political structures/dynamics.
- Consideration of the outcomes of the review of the external context, including the health status and health priorities (baseline health data), as well as specific potential vulnerabilities of the potentially affected stakeholders. As described earlier, stakeholder comments, concerns and perspectives are an important source of information to support this understanding. Perceived health impacts should be given due attention.
- Determine the social consequence level using the scale and site-related vulnerability of the potential impact/risk. The social consequence matrix notes that remediability is not considered.
- Indicate differences and inequities of how impacts will affect vulnerable groups, as per considerations in Box 4C.9.
- Consider cumulative impacts as an integral part of the assessments, as discussed in Section 3C under Task 9.
- Quantify impacts, when appropriate and when adequate data/models are available.
- Identify and, if possible, quantify uncertainty and limitations.

**Mental health and mental well-being impact assessments**: focus on impacts which affect how individuals maintain or can recover a state of good mental health and well-being in which they realise their own potential, are able to cope with the normal stresses of life, can work productively and fruitfully, and are able to contribute to their community.

**Workplace health studies or interventions**: including health risk assessments, medical service capability assessments, medical emergency response and evacuation plans, communicable disease plans, etc.

**Local waste management and hazardous materials management assessments**: assess the local capacity and infrastructure for transportation, handling, and disposal of waste and hazardous waste, if these are not addressed as part of the process and included in specific environmental management plans.

**Traffic-risk assessments**: aim to identify pre-existing traffic-risk areas and model optimal transportation and haul routes and times.

**Land access, displacement and resettlement health-risk assessments**: evaluate resettlement and livelihood-restoration plans through a health lens. Potential generic direct and indirect health impacts that may be associated with physical displacement and economic resettlement are summarised in the 12th approach in 4C Guidance Note 4.

**Site-induced management assessments and plans**: evaluate site-induced migration (SIM) impacts and risks from a health perspective, with generic impacts/risks summarised in the 12th approach in 4C Guidance Note 5.

**Bio-physical studies or monitoring reports**: including, air quality, surface/ground water quantity and quality, geochemistry/soil studies, noise and vibration.

**Socio-economic studies**: including baselines, community appraisals, etc.

**Artisanal and small-scale mining assessments**.
Inclusivity is a fundamental part of Anglo American’s approach. As part of our commitment to respecting human rights, we engage with all affected stakeholders, including those who are often excluded from traditional consultation or decision-making processes.

This approach is especially important, and potentially challenging, in respect of community health and safety. Impacts can vary significantly across different groups. The same impact may be more or less serious, depending on who is affected.

When assessing impacts and developing prevention/mitigation controls, the following should be borne in mind:

- All affected stakeholders need to be engaged in giving their consent to participate in health surveys.
- Consent needs to be based on information provided to individuals directly, rather than through others. This process may entail consulting with women separately.
- Baseline data should be disaggregated and analysed according to gender and age, and other relevant vulnerabilities (pregnancy, ethnic minority, etc.).
- The analysis of impacts should detail specific impacts on vulnerable groups, including systemic and site-specific vulnerabilities (as discussed in section 2 of the Social Way 3.0 (Task 5)).

Box 4C.9 Vulnerable groups and gender considerations

The impact and risk assessment process should ideally follow the approach (12 areas), to include:

- Identification of health-related issues that describes salient points of the internal and external context, specific vulnerabilities and stakeholder perspectives.
- The impact/risk definition that includes:
  - A health impact pathway – a cause of potential impact and risk on potentially affected stakeholders related to health determinants and outcomes owing to direct, indirect and cumulative activities of the site/project.
  - Effectiveness of existing controls.
  - A description of the unwanted event or identification of a priority unwanted event that may result from the anticipated impact.
- The impact evaluation (or impact analysis or assessment) that includes:
  - A rating of the social consequence level following the social consequence matrix (see Section 3C) that considers:
    - A modified determination of the scale for in relation to the specific impact or risk under evaluation. Several factors need to be considered as part of the definition of scale in the impact evaluation, including:
      - The magnitude of the health impact/risk that considers the intensity/severity of the health effect on receptors.
      - The temporal scale and duration of an impact/risk that may result in an acute short-lasting or a...
Determining the significance level for the scale of an impact is not a straightforward computation of duration of impacts versus numbers of community members affected. Likewise, determining the magnitude of an impact may be open to interpretation. Therefore, the analysis (assessment or evaluation) of each impact should be performed by a competent expert (i.e. a specialist with competencies in public health and HIA– see 4C Tool 5), who gives due regard to a range of relevant evidence and informs a transparent and reasoned conclusion on the significance levels for impacts, including:

- Chronic or long-term consequence. This can include both the duration of exposure to a hazard as well as the potential duration of a potential negative health outcome due to the impact.
- Spatial scale or extent of physical extent of influence of the impact/risk on sensitive receptors. This can include considerations as to whether potential impact is at: i) a localised area or confined to a small number of sensitive receptors (limited to a few individuals, small number of households or small settlement); ii) localised to an area within a site/project—this generally involves a number of communities or potentially affected stakeholders in the immediate area of the site/project; iii) a regional area which generally includes potentially affected stakeholders which may be away from the immediate area; and, iv) where health impacts can spread across vast areas (e.g. within a country or even internationally).

A determination of vulnerability for potentially affected stakeholders, including the ability to adapt to the pre-impact level of health.

Determine the risk rating by taking the defined consequence level and consider the likelihood of it occurring following the 5x5 matrix. The priority or significance of the risk is defined in the matrix and, importantly:

- Actual impacts/risks (i.e. those currently occurring) should always be classified as 5 in the likelihood column.
- All potential impacts/risks rated as High or Major social consequences are considered Priority Unwanted Events, irrespective of their likelihood.

Recommended mitigation/management measures/controls to effectively avoid, minimise, mitigate or remediate identified impacts.

The timing of the impact/risk in the project/site lifecycle and how long it may persist for (e.g. is the impact only expected during construction, or may it extend from construction into operations, or persist into closure?).
A robust, reasoned conclusion (in the impact evaluation) on the magnitude or significance of an impact, as well as the vulnerability of affected stakeholders to such impacts, should relate the evidence to the specific context of each health issue. The reporting should include a structured narrative that draws together the range of relevant information and dimensions to support the professional judgment taken on the significance level (consequence (scale and vulnerability) x likelihood) of each impact. The Social Consequence Matrix provides a framework to guide this process; however, specialist expertise and knowledge should be used to categorise impact consequence levels.

As relevant and possible, it is recommended that proposed controls or management measures are divided into three management components based on the focus of the intervention:

- **Policy context in the jurisdiction.**

- **Site-impact mitigation:** Interventions required to manage the potential health impacts/risks on sensitive receptors. These are deemed as required or recommended for the project/site to implement and are not voluntary contributions. The precautionary principle should apply while analysing these options together with practical considerations.

- **Occupational health, safety and environmental management:** Interventions aimed at ensuring a healthy, safe and productive workforce. In addition, it considers aspects that can be controlled in the workforce to address community health impacts.

- **Socio-economic development (SED) initiatives:** Interventions suggested that will improve the existing health status of the communities. These are voluntary contributions and should bring about health benefits and improve the social licence to operate in the receptive communities. These recommendations should be integrated into planning aligned to Section 4A, with overlap where possible to impact mitigation. It may be possible that certain management/mitigation controls can extend further than just reducing a negative effect and create a benefit.
Task 4 – Update SHIRA

Contents in this section:

Task 4 – Update SHIRA
Task 5 – Develop a Community Health and Safety management plan
Task 6 – Provide workforce training

The DO stage concerns updating and developing/updating and implementing the management plan. These tasks require internal and external stakeholder engagement. The DO stage also covers related training and education for site staff.

Task 4 – Update Impacts and risks and the related controls identified in the impact/risk assessment task (see 4C.2 Task 3) should be included in the site (see Section 3C).

For each health issue identified during the impact assessment, projects/sites should determine the level of impact and risk based on the consequence (scale, scope, remediability) and likelihood model. Impacts and risks with a higher consequence rating will require increased review, attention, management, and surveillance.

Where relevant for controls in the community (outside the fence) the proposed interventions should be presented to partner health authorities to involve and inform them of the potential impact, proposed intervention and to collaboratively identify and implement effective management measures.

Management actions are best developed based on engagements with local experts, health authorities and affected communities, as these stakeholders may identify special community concerns or additional management measures that can be considered based on the local context or culture. In addition, local stakeholders may be able to assist in developing additional or specific measures that may be required to reach vulnerable groups. However, while input from affected and other key stakeholders is critical to developing practical measures that are locally implementable, it is essential to manage expectations at an early stage, including pointing out that not all suggested measures may be adopted for implementation by the site, or that some activities may be phased.

Some impacts, risks and opportunities may be linked/related to other areas of social performance and/or DO SHIRA CHS.
environmental impacts; e.g. emissions, population influx, land access, displacement and resettlement, and contractor management, etc. Projects/sites should ensure that there is good understanding of the linkages and that the potential impacts and risks captured in are consolidated to avoid duplication, or having different ratings or controls for the same impacts or risks.

Controls for risks and impacts may include disease prevention; e.g. interventions that seek to reduce or eliminate the potential impacts, such as immunisation and use of treated bed nets to reduce risks from malaria; health promotion, such as hand-washing programmes and safe-sex awareness campaigns; and remedy, e.g. treatment intervention for road traffic accidents involving members of the community. Controls should be commensurate with impacts and risks, implementable, proven to work based on evidence, socially and culturally acceptable to the affected community, and cost-effective.

Recommendations for mitigation/management will focus on identification of measures that can be taken to reduce potential impacts to as low as reasonably practicable, both from a technical and financial perspective, ideally following the mitigation hierarchy of controls: avoid, minimise, mitigate, remediate and offset/compensate.
Based on defined impacts/risks and recommended controls (from Task 3) a Community Health and Safety Management Plan (CHSMP) should be developed that sites can use to plan, prioritise and monitor controls. The development of the CHSMP requires that the impact and risk assessment be completed, and control measures are agreed to and finalised. It is recommended that sites utilise a monitoring and evaluation matrix to guide the CHSMP, as outlined in Tools (see 4.6 Tools), which includes the following key elements:

- **Health impact/risk intervention theme** (for example, communicable disease management, accident and injury-prevention management, environmental health management, etc.).
- **What**: Proposed management intervention and specific elements/actions.
- **Priority of intervention**.
- **When/timing**: Phase of project. Period of intervention (short, medium or long term).
- **Where**: Targeted location of the activity (linked to area or potentially affected stakeholder, etc.).
- **Who**: Roles and responsible people/organisations, with a clear matrix developed on responsibility, accountability,
Sites may choose to develop the **CHSMP** as a stand-alone document, include as an Annex to the **SMP** or integrate the **CHSMP** into the **SMP**. However, high consequence/significant-related impacts and risks should be summarised in the **CHSMP** where the **SMP** is a stand-alone document.

Engagement with the **CHSMP** will be necessary prior to implementation of the **SMP**, in line with Task 13 in **Section 3C** (see **Section 3C**). Where controls for impacts or risks relate to other aspects of social performance or other functions, e.g. site-induced migration (**SIM**), environmental issues, resettlement, contractor social management, etc., they should be incorporated into the relevant management plans, while avoiding duplication. This may include engaging with other functions' plans where controls are cross-functional. Management plans should be aligned and cross-referencing to other management plans should be made where needed, with integration support by the **CHSMP**. For example, if site-induced migration (**SIM**) is predicted to have an impact on the transmission of HIV/AIDS in a community, controls to manage this impact should address and may be best captured in the **CHSMP**.

Implementation of certain actions to control impacts and risks may not be the sole responsibility of sites and may rely on partnerships with health authorities and public-health services, universities or NGOs with expertise and/or the mandate to do so. Ideally, sites should not take on the direct role of supporting health-systems strengthening in the public sector, or conducting health programmes, but should appoint a suitably qualified implementing partner. Where possible, existing or similar projects/programmes should be leveraged. Sites should assess potential partners' capacity to deliver in a sustainable manner during the development and, where needed, identify ways to support partners in fulfilling their roles more effectively. Sites must develop clear memoranda of understanding (MoU) or partnership agreements prior to commencing any implementation, in order to ensure that other parties' responsibilities are clear and to provide mechanisms for monitoring and reporting to track implementation.

If not completed in the scoping or data-collection phase, the institutional capacity of the host country or local health system should be evaluated for systemic weakness, as this absorptive capacity is often a limiting factor for the successful implementation of mitigation strategies. Specific capacity building and health systems strengthening may be required, noting that this may be a slow process that requires extended commitment.
The workforce can be directly affected by conditions, and, in turn, the workforce can have an impact on conditions. The site workforce, therefore, should understand relevant issues. This information should be a component in site-induction training. Ongoing training on specific issues should also be provided to senior management, contractors and sub-contractors as needed.
Task 7 – Monitor and Evaluate

Contents in this section:
Task 7 – Monitor and Evaluate

The CHECK stage concerns monitoring the health and safety status of the potentially affected stakeholders to ensure the management actions and mitigation hierarchy adopted are effective in managing identified impacts and that management controls are effective.

Task 7 – Monitor and evaluate

Sites should monitor whether controls are being implemented according to plan and whether the controls are effective at preventing, mitigating, or managing identified impacts and risks.

Monitoring data can also inform further investigations to identify the root causes of emerging issues.

Sites should develop appropriate and relevant monitoring indicators for control implementation, control effectiveness, and overall health conditions of the affected communities, as relevant and appropriate. An example is provided in Table 3C.3 in Section 3C.

Where impacts and risks, management interventions and associated indicators require extensive monitoring and/or monitoring data collection by a range of internal and external parties, sites should consider developing a Community Health Monitoring Plan (ideally as part of the CHSMP) to outline the process and roles and responsibilities for collecting, tracking and analysing monitoring data. The plan should consider opportunities for participatory monitoring.

Long-term objectives identified as part of Review and Planning (see Section 2) may also relate to”, in which case a monitoring and evaluation (M&E) framework should also be developed to track progress against the long-term objectives (see Section 2).

Monitoring of impacts and risks and controls can be complex and require the ongoing methodological collection of data to provide an indication of progress towards achieving a desired goal(s). Evaluation is focused on measuring the short, medium- and long-term results obtained from the monitoring data, to determine the overall effectiveness of interventions/actions, ideally linked to key performance indicators (KPIs).
Define a clear framework before commencing the project/intervention. Define key performance indicators (KPIs) that:

- capture leading and lagging data sets.
- use units that are measurable and can support an evaluation of change (quantitative and/or qualitative).
- can be clearly linked to the site and identified impacts (and are different from indicators that may be unrelated to the site).
- are able to distinguish between input, output and outcome indicators.
- are simple to measure.
- are reasonable and practical to implement and track.
- are time-based.

GIS-enabled

Ability to analyse trends over time, visually and spatially

Ensures privacy and protection

Has linkage with worker-health surveillance data (where the denoted workforce are part of the community under evaluation).

Is expandable and updatable as new indicators emerge

Informs ongoing risk/impact assessments

Informs update of major actions

Required during major phase changes and at regular intervals during high-risk period (construction phase).

M&E

SED

Different sources of data may be considered to support the framework, with examples discussed in Tools (4C.7 Tools).

Table 4C.3 Example

<table>
<thead>
<tr>
<th>Potential impact</th>
<th>Controls</th>
<th>Target</th>
<th>Control owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation check</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness or Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase in the incidence of vector-borne disease</td>
<td>Management of malaria and arboviral breeding sites on site</td>
<td>Prevention of transmission of malaria and arboviral disease by mosquitoes</td>
<td>Site social team, Site environmental team</td>
<td>4 months before construction</td>
<td>Ongoing into operations</td>
<td>Specialist in infectious disease special</td>
<td>Larval source management controls within Anglo American property</td>
<td>Workers and community taking prevention measures-</td>
<td>Behaviour change</td>
</tr>
</tbody>
</table>

Example: MoU in place with health authority to support disease and vector-control interventions
<table>
<thead>
<tr>
<th>1</th>
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</tbody>
</table>

Participatory monitoring is not a requirement in relation to construction activity disturbing ground and creating suitable breeding sites for mosquitoes in manmade receptacles. Awareness campaigns for workers and communities, distribution of repellents, larval source management of places of mosquito breeding sites, control of adult mosquitoes through chemical control programmes, site health team input, specialist entomology input, capital and operational expenses for vector-control equipment and commodities, data generated by public local-health surveillance authority, workers and community members aware of prevention measures, larval source management controls in the community, % coverage of vector control activities, % coverage of diagnostic and treatment establishment of entomology and disease surveillance system, reduction in mosquito breeding rates on entomology surveillance, reported cases of arboviral disease, reported cases of malaria, effective treatment of malaria, vector-control activities vs target.

Verification: Health survey results provided by health authority, malaria and arboviral point prevalence rates, verification: seroprevalence studies, entomological inoculation rates, verification: entomological studies, participatory monitoring.

Participatory monitoring of impacts and risks particularly helps adherence to management actions that depend on external stakeholders, such as adherence of communities and individuals to health and safety good practices; e.g. safe driving, use of mosquito bed nets and insect repellents, proper domestic-waste disposal. Because health is a sensitive issue, early stakeholder engagement is the basis for the success of participatory monitoring. It helps define who can, wants and needs to participate at the monitoring stage; identifies ethical considerations and uncertainties; and allows discussions to take place about how information will be used before data is collected or stored.
Monitoring helps ensure that the implementation of controls is on track and that the controls are having the desired effect. Modifications of controls can be made as needed, based on monitoring and evaluation data, and action should be taken if an emerging health issue was not anticipated or if controls in place are not proving effective.
The assessment of impacts and risks, the management plan and monitoring results should be consolidated and reported to the [INSERT], as applicable (see Section 1).

External reporting will depend on regulatory requirements; e.g. cases where an [INSERT] or [INSERT] is mandatory, and [INSERT] stakeholder commitments. It is advisable that results of [INSERT] studies are well documented and consolidated in tailored reports to be shared with partners, authorities and communities, as applicable.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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The nature, scale and complexity of the site and its associated risks and impacts, along with the external context, should be considered when planning for human and financial resources allocated to management. Those responsible for overseeing are likely to be embedded within the social performance team. Coordination with all teams is essential, as risks and impacts are typically associated with many different functions; e.g. operations.

Roles and responsibilities

Table 4C.4 lays out roles and responsibilities for managing. Sites have the responsibility to engage with local authorities, local institutions and the population at risk. Clearly assigned responsibilities for management should exist from the project-development stage onwards.

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
<th>GROUP</th>
</tr>
</thead>
<tbody>
<tr>
<td>GROUP Social Performance</td>
<td></td>
<td>Provides oversight, advice and input on implementation of the toolkit. Particular consideration on providing guidance on how sites can meet Performance Standards, especially 1, 4, 5 and 7, and relevant international practice</td>
<td></td>
</tr>
<tr>
<td>GROUP Socio-Economic Development and Partnerships team</td>
<td></td>
<td>Provides oversight, advice and input on implementation of Section 4A Socio-Economic Development, and consideration of how the Community Health and Safety workstream may contribute data or information for health needs assessment.</td>
<td></td>
</tr>
<tr>
<td>GROUP Environment, Occupational Health, and Safety</td>
<td></td>
<td>Provides guidance on how to integrate social requirements (e.g. community health) into the Management system and supporting Standards.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>BUSINESS UNIT</th>
<th>E.g. Government CHS</th>
<th>CHS</th>
<th>CHS</th>
<th>IFC</th>
<th>SHE</th>
<th>S&amp;SD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Provides advice on national health and safety legislation and regulations</td>
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</tr>
</tbody>
</table>

**4C Community Health and Safety Management**
Relations Manager

SITE SOCIAL PERFORMANCE TEAM Manager, supported by experts as relevant

Engagement

Planning

Implementation

Monitoring and reporting

SITE OCCUPATIONAL HEALTH AND SAFETY AND SUSTAINABLE Environment Manager

Acts as contact point with regional and national authorities

Receives regular updates through quarterly reports

Ensures appropriate capacity and expertise are available to site

Supports stakeholder engagement activities to promote alignment and integration between departments.

Engages and builds relations with local authorities.

Builds and maintains relations with local communities

Recruits and trains support staff, including person responsible for CHS.

Liaises with HR on workforce-community health issues

Co-ordinates input from other departments

Overall responsibility to conduct the scoping exercise.

Defines, in consultation with local authorities (as required), terms of reference for the health impact assessment, including baseline-data-collection activities.

Oversees commissioning of assessments

Participates in the assessments to ensure consistency of relations with communities, where appropriate. Refrains from participating when there are sensitive or controversial issues with communities.

Supports the establishment of a health database as part of the health baseline or stakeholder comments

Co-ordinates stakeholder engagement activities with other teams.

Undertakes/co-ordinates an impact and risk assessment, drawing on baseline data supported by expert specialists, as needed

Meets and respects ethical requirements

Ensures the development of a CHSMP, as needed

Selects implementation partners, as relevant

Evaluates opportunities to co-ordinate or integrate community-health activities.

Trains and educates local workforce on relevant issues

Develops and implements a health monitoring plan, as needed

Manages the implementation partners, as required

Adapts/controls and practice according to feedback via the monitoring system

Develops health-reporting strategies

Provides analytical reports to GM HoDs BUs
DEVELOPMENT TEAMS
Planning
Implementation
Monitoring and reporting
SITE MANAGEMENT
General Manager (GM)/
Supports, engages and builds relations with local authorities
Liaises with Human Resources (HR) on workforce-community health issues
Aligns with stakeholder engagement plans and processes to ensure effective co-ordination and recording of engagement/commitments and grievances.
Supports conducting of the scoping exercise and to define terms of reference for the assessments as part of the working group or steering committee
Supports the establishment of a health database and shares occupational-health data
Contributes to impact and risk assessment, drawing on baseline data supported by expert specialists, as needed
Supports the development of a,

HoDs
Designates representatives from relevant departments to support team on issues

Accountable for delivery of the commitments to achieve the Group's Sustainable Mining Plan
Approves the development and implementation of the / controls

CHS

Accountable for delivery of / controls

CHSMP CHS

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A range of tools and guidance notes that support the toolkit section is included below and should be used as relevant to support.

4C Tool 1 – Sample table of contents for a health impact assessment study report

The guidance note on health impact assessment (HIA) provides a sample outline of the general contents that should be included in an HIA. While the content may vary at scoping, depending on the scale of the project, the table below provides an overview of elements that should be considered in reports:

<table>
<thead>
<tr>
<th>Main heading</th>
<th>Sub-heading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive summary</td>
<td></td>
</tr>
<tr>
<td>Terms of reference</td>
<td></td>
</tr>
<tr>
<td>Site description and activities (expanded from internal context)</td>
<td></td>
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<tr>
<td>Relevant legislation and regulations</td>
<td></td>
</tr>
<tr>
<td>Health-impact assessment approach methodology</td>
<td></td>
</tr>
<tr>
<td>Activities performed in the health-impact assessment</td>
<td></td>
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<tr>
<td>Project background</td>
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<tr>
<td>Objectives of:</td>
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<tr>
<td>Outputs of the CHSMP</td>
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<tr>
<td>Scope of work</td>
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<tr>
<td>Project location and community context</td>
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<tr>
<td>Overview of project/site activities, key operational aspects and infrastructure (e.g. front-end engineering design)</td>
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<tr>
<td>Labour force and accommodation</td>
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<tr>
<td>Project/site temporal boundaries</td>
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<tr>
<td>Project/site spatial boundaries (linear features (roads))</td>
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<tr>
<td>Specific elements:</td>
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<tr>
<td>Size and origin of workforce (especially contractors)</td>
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<tr>
<td>Housing/accommodation</td>
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<td>Water supply and sanitation</td>
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<td>Waste management</td>
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<tr>
<td>Need for dams</td>
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<tr>
<td>Current/planned workplace health services</td>
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<tr>
<td>Transport (goods and workers)</td>
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<tr>
<td>Need for displacement/resettlement</td>
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<tr>
<td>Potential for site-induced migration (SIM)</td>
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<tr>
<td>Current, planned or past development initiatives</td>
<td></td>
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<tr>
<td>National regulations and legislation</td>
<td></td>
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<tr>
<td>International management standards and regulations</td>
<td></td>
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<tr>
<td>Form and level of HIA (desk/rapid/comprehensive)</td>
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<tr>
<td>Completed activities:</td>
<td></td>
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<tr>
<td>Desk-based data collection</td>
<td></td>
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<tr>
<td>Field-based data collection</td>
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<tr>
<td>Stakeholder engagement and analysis</td>
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</tbody>
</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4C Community Health and Safety Management
4C Tool 2 – Community health and safety areas

To ensure that assessments follow a systematic approach in considering relevant/appropriate topics, a standardised methodological process is recommended that considers 12 areas – termed CHS. While not every area will be relevant for all projects, this method provides a structure for organising and analysing potential health impacts and risks on the community and broadly supports a structure to capture the majority of linkages between project/site-related activities and community level impacts.

These sets of areas can be used at scoping, in collecting baseline data and for the impact assessment process. They can be used for all levels of assessment (desk-top, rapid appraisal and comprehensive).

### Community health and safety areas (CHS)

**Relevant determinants of health**

**Potential health issues**

1. Communicable diseases linked to the living environment and housing
   - Transmission of communicable diseases through close contact and via the respiratory or droplet route:
   - Bacterial: bacterial pneumonia (e.g. Streptococcus pneumonia, Haemophilus influenzae etc.), bacterial meningitis (Group B streptococcus), plague, diphtheria, and pertussis.
   - Mycobacterial: tuberculosis, leprosy
   - Viral: Covid-19, influenza, viral meningitis, measles, varicella, rhinovirus, RSV etc.

2. Vector-related diseases
   - Mosquito: malaria, dengue, yellow fever, lymphatic filariasis, rift valley fever.
   - Fly: human African trypanosomiasis, onchocerciasis, etc.
   - Tick and flea: rickettsial, lyme's disease, plague.
   - Lice-related diseases

3. Soil, water- and waste-related diseases
   - Poor socio-economic conditions
   - Environmental sanitation/hygiene
   - Health prevention and care-seeking behaviour
   - Access to, acceptability and affordability of health services.
   - Age and pregnancy
   - Education

   - Diarrheal diseases- bacterial (E.coli, shigella, cholera, salmonella), protozoal (giardia) and viral (rota-virus)
   - Schistosomiasis (bilharzia)
   - Hepatitis A and E
   - Poliomyelitis
   - Soil-transmitted helminthiases (hookworm) or intestinal parasites (round worm)

4. Sexually transmitted infections
   - Poverty

5. Systemically vulnerable groups

6. Potentially affected stakeholders

7. Key indicators and burden of disease from national, regional and district
   - Key indicators and burden of disease data at the local level as a summary

8. Potentially affected stakeholders

9. Potentially affected stakeholders

10. Potentially affected stakeholders

11. Potentially affected stakeholders

12. Potentially affected stakeholders
### Community Health and Safety Areas

<table>
<thead>
<tr>
<th>Relevance</th>
<th>Determinants of Health</th>
<th>Potential Health Issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>CHSAs</td>
<td>Transmitted infections</td>
<td>Gender inequality, health prevention and care-seeking behaviour, access to, acceptability and affordability of health services, substance abuse, cultural education, feeding behaviours and practices, health prevention and care-seeking behaviour, access to, acceptability of, and affordability of health services, exposure to hazardous substances, road traffic accidents, work-related accidents, community accidents related to site infrastructure and equipment, non-accidental trauma linked to inter-personal or crime-related violence, gender (domestic)-based violence, poverty, culture, education, war and conflict (safety/security), police and justice system, social and community cohesion, cardiovascular diseases, diabetes, chronic lung disease, cancer.</td>
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<td>Non-communicable diseases</td>
<td>Age, gender, poverty, substance abuse, cultural education, feeding behaviours and practices, health prevention and care-seeking behaviour, access to, acceptability of, and affordability of health services, exposure to hazardous substances, emergency-response services, health facilities, culture, education, war and conflict (safety/security), police and justice system, social and community cohesion, road traffic accidents, work-related accidents, community accidents related to site infrastructure and equipment, non-accidental trauma linked to inter-personal or crime-related violence, gender (domestic)-based violence, poverty, culture, education, diet and nutrition status, health and risk-taking behaviour, education, health prevention and care-seeking behaviour, access to, acceptability of, and affordability of health services, food inflation, climate and propensity for natural disasters, ecosystems services and biodiversity.</td>
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<td>Accidents/injuries</td>
<td>Age, gender, poverty, substance abuse, cultural education, feeding behaviours and practices, health prevention and care-seeking behaviour, access to, acceptability of, and affordability of health services, exposure to hazardous substances, emergency-response services, health facilities, culture, education, war and conflict (safety/security), police and justice system, social and community cohesion, road traffic accidents, work-related accidents, community accidents related to site infrastructure and equipment, non-accidental trauma linked to inter-personal or crime-related violence, gender (domestic)-based violence, poverty, culture, education, diet and nutrition status, health and risk-taking behaviour, education, health prevention and care-seeking behaviour, access to, acceptability of, and affordability of health services, food inflation, climate and propensity for natural disasters, ecosystems services and biodiversity.</td>
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<td>Veterinary medicine and zoonotic diseases</td>
<td>There is a significant overlap in the environmental impact assessment in this section. Outcomes may include:</td>
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<td>Environmental health determinants</td>
<td>Often co-morbid linkages to other conditions such as HIV and TB.</td>
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<td>Gender inequality, health prevention and care-seeking behaviour, access to, acceptability and affordability of health services, substance abuse, cultural education, feeding behaviours and practices, health prevention and care-seeking behaviour, access to, acceptability of, and affordability of health services, exposure to hazardous substances, road traffic accidents, work-related accidents, community accidents related to site infrastructure and equipment, non-accidental trauma linked to inter-personal or crime-related violence, gender (domestic)-based violence, poverty, culture, education, war and conflict (safety/security), police and justice system, social and community cohesion, cardiovascular diseases, diabetes, chronic lung disease, cancer, under- and over-nutrition, anaemia or micronutrient deficiencies (folate, Vitamin A, iron, iodine), food safety and security, access to land plays a major role in developing subsistence-farming contexts, food inflation, climate and propensity for disasters, education.</td>
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<td>Diseases affecting animals (e.g. bovine tuberculosis, swinepox, avian influenza). Diseases that can be transmitted from animal to human (e.g. rabies, brucellosis, Rift Valley fever, Lassa fever, Ebola fever, leptospirosis, etc.).</td>
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<td>Other conditions such as HIV and TB, often co-morbid linkages to other conditions such as chronic bronchitis, tuberculosis, cardiovascular disease, chronic lung disease, cancer, under- and over-nutrition, anaemia or micronutrient deficiencies (folate, Vitamin A, iron, iodine), food safety and security, access to land plays a major role in developing subsistence-farming contexts, food inflation, climate and propensity for disasters, education.</td>
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<td>Noise, water (surface/ground), soil pollution, and air pollution (indoor and outdoor). Exposure to heavy metals and hazardous chemical substances and other compounds from process activities. These can be related to emissions, or spills (including transport, disposal) or transfer from the workers to the public (e.g. on contaminated clothing).</td>
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<td>Ionizing radiation, visual impacts, malodours.</td>
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<td>The hazard and potential exposure. Emergency-response systems to deal with acute exposure episodes. Psychosocial stress and mental health issues.</td>
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Community health and safety

Relevant determinants of health
Potential health issues

10. Social determinants of health

As described in Box 4C.3, this considers the social health determinants and may include:

Social determinants of health

There is a significant overlap in the social impact assessment in this section. Health outcomes may include:

11. Health-seeking behaviours and cultural health practices

12. Health systems issues

Health system determinants, including:

4C Tool 3 – Comparison of health assessment methodologies

Workplace health and safety and community health and safety are interconnected, with various health determinants potentially influencing or affecting health outcomes in both the community and the workplace. Actions or activities in the workplace may affect community health and safety (for example, directly through emissions that may affect air quality, or indirectly through site-induced in-migration that places pressure on existing public services and amenities), and prevailing conditions in the community may affect workplace health and safety (for example, a high burden of communicable disease may result in a high incidence in the workforce). In addition, assessments may seek to understand the potential impacts and risks related to a site, project or programme, the objective of this assessment being to anticipate future issues; however, assessments may also have the objective of supporting or strengthening the health system or an element in the community, the objective of the assessment being to understand the current needs and opportunities to provide targeted support.

With these objectives and outcomes in mind, the table below describes three potential health assessment methodologies, and while they can benefit from exchanging or sharing data, the objectives differ. The suggested application for Anglo American sites includes:

Gender
Poverty
Social status
Housing
Land access and physical/economic displacement
Inequalities
Education
Employment and working conditions
Culture and ethnicity.
Security and violence
Substance abuse
Access (transport, information, communication)
Affordability
Social and community cohesion
Expectations of the project

Psychosocial stress and mental health issues
Gender issues and gender-based violence
Suicide
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**4C Tool 4 – Health impact assessment process**

- **Task 1: Scoping**
  - Identify and analyse the context (baseline data).
  - Collect additional baseline data (potentially participatory data).

- **Task 2: Review**
  - Define level of risk/impact.
  - Outline potential data sources.
  - Anticipating potential health impacts for baseline data assessment.

- **Task 3: Analysis**
  - Impact definition: cause and comment on potential health impacts.
  - Evaluate how site/project-potentially cause risk or impact.
  - Identify and analyse SED, SHIRA, and SUNA impacts.

- **Task 4: Reporting**
  - SHIRA Update.
  - Risk/impact evaluation.

**Priority-setting**

- External stakeholder engagement:
  - Community stakeholder engagement.
- Sustainability considerations:
  - Not central, as primary focus is on risk and impact assessment.
- Monitoring and evaluation:
  - Needs to consider systemically vulnerable groups.
- Interventions to track outcomes.

**Data collection**

- Extensive engagement with actors mentioned in scoping.
- Generally limited unless communication on complex issues/concerns is always included as a component of the Social Way 3.0.
- Ideally, internal steering group support is required/warranted.
- May require specialist group support.
- Generally, not required unless communication on local or regional level.
- Initial engagement with programme managers.
- Extensive engagement with organisations (NGOs).
- Support from responsible committee.
- May require steering committee.
- May require report to the steering committee.

**Baseline health data**

- A health impact assessment report that includes:
  - A fully referenced baseline health and wellness programmes.
  - A summary of next steps.

**Legal processes and requirements**

- Generally, not required unless communication on communication (as required)
- Part of disclosure and transparency management.
- Workplace exposure risks and controls is required to manage stakeholder perceptions.
- Generally limited unless communication on workplace controls.
- Extensive engagement with workplace exposure risks and controls is required to generally not required unless communication on workplace exposure risks and controls.

**Community and government priorities**

- Should involve the community as co-decision-makers.
- Needs to ensure transparency and manage stakeholder perceptions.
- Will potentially present divergent views.
- Should involve the community as co-decision-makers.
- Needs to ensure transparency and manage stakeholder perceptions.

**HIA process**

- Process is not linear, the essential elements typically involve the tasks described in the table below, supported by the general context (baseline data).
HIA Identifies what needs to be managed
HIA
Stakeholder engagement
Can support
Can lead complex HIAs
Can support training as required

Provision of the following skills is recommended for an HIA practitioner:

- Skilled knowledge of the disease or condition
- Awareness of local public health resources

The selection of a suitably qualified health impact assessment practitioner or public health resources to perform specialised tasks can be a complex process. Tool 4C Tool 5 – Use of external specialist consultants

The allocation for financial and human resources to support an HIA should be proportionate to the anticipated impacts and risks, level of the project/site, and the extent of external support. HIAs for complex mining projects or sites should be led by a practitioner experienced in the impact/risk assessment process and the collection of baseline data, and with the local stakeholder relationships (local communities or health authorities). Depending on the context, familiarity of the local health conditions, language, culture and stakeholders will be essential. In these instances, Experience in workplace health and safety (occupational health) would be beneficial. Experience or understanding of mining or industrial processes and indirect activities. Experience in development initiatives; ideally, mining, oil and gas, infrastructure or agricultural projects. Training in designing and implementing health interventions. Design of specialised health interventions. Surveys (such as entomology or toxicology exposure assessments). Need to conduct specialised or comprehensive baseline data collection, including household surveys, biomedical sampling, specialised surveys (such as entomology or toxicology exposure assessments). Complex local context, including: Specialised skills required. Lack of resources or skills at the site level. Absolute need for independence even at the stage of scoping. Cultural or traditional factors. Local stakeholder relationships (local communities or health authorities). The following skills are recommended for an HIA practitioner:

1. Good understanding of the HIA process/tasks
2. Has suitable public health experience and qualifications
3. Has led at least 2 years’ experience conducting HIAs
4. As above, requires at least 5 years’ experience in doing HIAs
5. Substantial experience in implementing health interventions.
6. Good understanding of the mining process and company impact/risk assessment processes
7. Post-graduate qualification in health or social sciences, supported by public/global or population health exposure/qualification. A medical doctor should not be a requirement, and it is noted that at, times, such a qualification may not be suited to an HIA practitioner.
8. Adequate skills and qualifications to appraise and audit a non-complex HIA, with support from an experienced practitioner.
9. Good understanding of the IFC PS or Equator Principles processes and guidelines
10. At least 2 years’ experience conducting HIAs
11. As above, requires at least 5 years’ experience in doing HIAs
12. Substantial experience in implementing health interventions.
13. Good understanding of the mining process and company impact/risk assessment processes
14. Post-graduate qualification in health or social sciences, supported by public/global or population health exposure/qualification. A medical doctor should not be a requirement, and it is noted that at, times, such a qualification may not be suited to an HIA practitioner.
15. Adequate skills and qualifications to appraise and audit a non-complex HIA, with support from an experienced practitioner.
16. Good understanding of the IFC PS or Equator Principles processes and guidelines
17. At least 2 years’ experience conducting HIAs
18. As above, requires at least 5 years’ experience in doing HIAs
20. Good understanding of the mining process and company impact/risk assessment processes
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85. Adequate skills and qualifications to appraise and audit a non-complex HIA, with support from an experienced practitioner.
The matrix in the table below presents a template of a community health and safety management and monitoring plan that sites can use to address each theme or management plan element (e.g. communicable disease management plan) to provide the required detail of actions and monitoring elements, including:

- Target location, especially if focus on discrete areas/populations is required.
- Specific roles and responsibilities in detail, including possible service-level agreements.
- Funding and human resources requirements – including capital and operational budgets.
- Potential partners and implementing partners/providers. This may include terms of reference for proposals, service-level agreements, etc.
- Reporting of activities and on defined metrics.
- Financial and human resources requirements – including capital and operational budgets.
- Specific roles and responsibilities in detail, including possible service-level agreements.
- Target location, especially if focus on discrete areas/populations is required.
- Timing and detailed implementation and monitoring schedule.

Data collection and monitoring linked to specific plans and programme interventions, with the following considerations:

- Input could be education and health systems strengthening.
- Collecting data is not only important to inform the baseline health status as part of the impact/risk assessment process, but also to support the performance indicators and details on how data will be collated, stored and analysed and reported.

An example could be a sexually transmitted infection (STI) management programme:

<table>
<thead>
<tr>
<th>Theme</th>
<th>Timing/phase</th>
<th>Monitoring and evaluation</th>
<th>Surveillance method</th>
<th>Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>CHSAs</td>
<td>Transport workers.</td>
<td>Target population/area</td>
<td>developed and completed and affected stakeholders.</td>
<td></td>
</tr>
</tbody>
</table>

The reason for this is so that overlapping actions between CHSA operations through community and workplace programmes in the affected workplace and programme in the affected workplace can be addressed as a collective impact and risks, but it is generally important to inform the baseline health status as part of the impact/risk assessment process, but should be based on the workplace and programme in the affected workplace.
This Guidance note provides practical advice to facilitate planning and implementation of health impact assessment (HIA) processes. It outlines key considerations to ensure the effectiveness and feasibility of the scoping process.

### Inputs
- **Identifying**: External context review (considering the external context review undertaken as part of Section 2 Task 4 and internal context review undertaken as part of Section 2 Task 2). The approach to conducting a cross-sectional baseline health survey that includes a variety of indicators is attached in Guidance note 4C.2.
- **Evaluate Priorities and Provide a Wide Set of Demographic, Health, Core Welfare, and Socio-Economic Indicators**: This can be very useful and powerful for tracking a reproducible set of indicators to see how things have changed over time, reducing the lag, that will limit the ability to respond proactively.

Rapid adjusting interventions (e.g., increasing testing rates of syphilis and HIV in health centers) can be used to support specific points of departure for interventions and can provide local-level information that can support sustainability and scaling up.

### Scoping Exercise
- **Performance Management Committee**: Determined on a case-by-case basis. The steering committee can be defined, e.g., a lead assigned to lead the scoping exercise.
- **External Skilled Resources**: As far as possible, the scoping exercise should be conducted internally, with support from the Group External site resources or specialists that may have data or information that can be used.

A working group should be established to support different elements of the scoping studies and overlap across studies is supported, as needed.

### Working Group
- **Potential Service Providers or Implementing Partners**: Can include government health authorities, authorities' social development at the regional or local level, healthcare workers/officials, Public health authorities at a national, regional (provincial) or district/local level, Engineering and mining, Occupational health and safety, Human resources on workplace demographics etc., specifically of local quality, noise modeling etc.

The working group should or can be established in addition to the steering committee and/or the steering Committee and/or the lead (responsible/accountable person at site level) can be the same or a different person, but they should be accountable to a single person at the site level so that integration of each action throughout the scoping process may include site relations with government health authorities, and the authorities' responsibilities.

The inclusion of external stakeholders on the steering group and external resources, as needed, is important to obtain so that it facilitates the engagement and participatory process, including supporting engagement with various internal and external resources.

### Areas of Concern
- **Spatial and Temporal Boundaries**: Include timelines for various elements of the scoping process, including specific milestones.
- **External Stakeholder Engagement Strategy**: The cross-functional support and make-up of the working group should continue throughout the entire process.

Benefits of including health and social development in the scoping process – the preliminary assessment of risks and overlap across studies is supported, as needed.

### Plan
- **Linkage to Other Social Way and 4G: Site-induced Migration**: Cross-functional support and make-up of the working group should or can be established in addition to the steering committee and/or the lead (responsible/accountable person at site level) can be the same or a different person, but they should be accountable to a single person at the site level so that integration of each action throughout the scoping process may include site relations with government health authorities, and the authorities' responsibilities.

The inclusion of external stakeholders on the steering group and external resources, as needed, is important to obtain so that it facilitates the engagement and participatory process, including supporting engagement with various internal and external resources.

### Outputs
- **Outputs can be a process activity of the number of people reached and improved testing and treatment capacity in health facilities.**

- **Outcomes may be behavioral change and the testing rates of syphilis and HIV in health centers.**
Guidance

It also informs the establishment of the CHS HIA AOI methods (actions) guidance.

Internal-context review (desk work and internal engagement across various functions)
Field work (including external engagement)

Screen for stakeholder engagement in the study area, including:

Site and prospective site.

Stakeholder engagement, including:

Kick off meeting with the local collection of data (to perform some of the field tasks below).

Any studies or reports from peer mining companies that highlight what is available or easily collectable.

CHS baseline at the local level and will form the basis of the preliminary baseline health data description.

Review the current external context (available from Review and Planning, i.e. Section 2 Task 4)
Review any past specialist studies of reports and specialist studies that have been completed and on potentially affected stakeholders.
Review workplace risk and controls register (if in projects phase or new elements) preliminary project description and planned front-end study.

Historically for the site

Research on background for the site.

Baseline should not be captured solely in a defined based on environmental or social criteria.

Ideally, the internal context review undertaken as part of Review and Planning, i.e. Section 2 Task 4 should take place during the scoping exercise, with the objective of developing a preliminary scoping report around each area of concern and/or each potential AOI.

Defining potentially affected stakeholders is an iterative exercise based:

- relevant stakeholders feedback (from past 2 years or another relevant time period)
- timing and logistics
- any nature – whether for Sustainable Mining Plan, workplace health or community health, etc. 

Vulnerability assessment (for example, on the human capital’s exposure to its objective and intended outcomes, and to outline the envisaged role of the health management measures) for each.

At the end of the scoping exercise, with the objective of developing a preliminary scoping report, which will continue, with additional information on baseline and how Baseline Health Studies are planned for later on.

The external-context review for CHS/HIA should be various

- consolidation (within the
- should be collected during the scoping exercise, with the objective of developing a preliminary scoping report)
- stakeholder engagement is fundamental to this
- scoping exercise can be used to inform the systemic vulnerability assessment (for example, on the human capital’s exposure to its objective and intended outcomes, and to outline the envisaged role of the health management measures) for each.

Ideally, the internal context review undertaken as part of Review and Planning, i.e. Section 2 Task 4 should take place during the scoping exercise, with the objective of developing a preliminary scoping report around each area of concern and/or each potential AOI.
Methods (actions) Guidance

Healthcare workers at public health centres (mobile clinics, clinics or hospitals) and team leaders of community health workers are identified as key individuals whose traditional role as gatekeepers to community and family health. Male focus group discussions using a semi-structured tool can be conducted to understand their traditional roles.

Field visits to the potentially affected stakeholders or communities to directly involve their perspectives in the scoping exercise can be conducted. If possible, conducting a Service Availability and Readiness Assessment (SARA) based on an adapted methodological review of three variables as described in Figure 2 can be considered.

Analytical activity includes a preliminary assessment of areas of concern and preliminary assessment of significant potential health impacts will be highlighted so they can be addressed without waiting for the entire scoping exercise. These impacts identified may already be included in the site Management Plan, or, in a more intensive and complex process. Therefore, data gaps should be prioritised when planning for specific baseline health studies to fill them. The resources employed on filling the gaps should be proportionate to the scope and scale of the possible/likely impacts and risks.

If important data gaps are identified and primary data collection involves outsourcing to consultants or national/academic institutions, the proportion of the budget should be prioritised. If insufficient or inadequate data is available, a project activity should be established (i.e. during Task 7 ‘Initial data collection’) and recommended controls can be proposed for early implementation. Data collection should be prioritised when planning for specific baseline health studies to fill them. The resources employed on filling the gaps should be proportionate to the scope and scale of the possible/likely impacts and risks.

Proposed project activities (in general terms) and how they are defined during the scoping exercise, as well as the definition of a monitoring framework is key to developing terms of reference for such activities – and then be concluded. However, if significant data gaps are identified within the scoping exercise, then the working group should make a professional judgement about whether further data and information should be collected later on in the process when a decision has to be made about whether continuing on with the scoping exercise versus continuing on with the baseline health and well-being assessment.

Data-collection option should be considered in the context of stakeholders within the site management plan, key health impact areas, stakeholder comment and concern, as well as direct or indirect fashion (site-level vulnerabilities). These may impact the prevailing health conditions in the potentially affected stakeholders and the health systems and services being assessed. Stakeholder comment and concern, as well as interlinkages, synergies and overlaps across functions and wider Anglo American work with external stakeholders. Identify data-quality issues, or the available data is not sufficiently linked to specific key performance indicators (KPIs). This means data-collection strategies and activities to be highly focused and linked to specific KPIs. This means data-collection strategies and activities to be highly focused and linked to specific KPIs.

On identifying major concern (the likely case of inadequate or insufficient data, whether the collection of additional baseline health data is warranted. In practice, the gap analysis has a focus on the health outcomes and determinants of significant data gaps. Gaps may exist because baseline should clearly identify the critical data/information is not adequate or sufficient (e.g. there may be data-quality issues, or the available data is not sufficiently linked to specific KPIs). This means data-collection strategies and activities to be highly focused and linked to specific KPIs.
Figure 2 - Triangulation of data to determine areas of concern
Planning next steps in the process as an output from scoping process

A key objective of the scoping process is to define the scope, limits, time and resources for the process (i.e. the assessment of impacts), or, in other words, define the remaining tasks to perform as part of the process. The level of the is also generally defined as an outcome of the scoping process, which defines the required intensity/effort and resources, particularly in relation to the collection of new community-level data, the extent of external stakeholder engagement and overall time needed to complete the assessment.

While there is no formal algorithm to select the type of, three variables are often considered, which include: i) complexity of the site/project footprint; ii) magnitude and complexity of potential impact areas of concern; and, iii) social sensitivities. Often there isn't a clear demarcation between these considerations, and they should be seen as a continuum.

The three levels that are defined for application in Anglo American projects/sites are supported by the matrix in Figure 4C.1 in the introduction section, and include:

The characteristics and elements of the various levels of are described in Table 3.

Table 3 - Levels and characteristics of different

<table>
<thead>
<tr>
<th>Type of</th>
<th>Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Desktop</td>
<td>Provides a broad overview of possible health impacts and risks</td>
</tr>
<tr>
<td>Rapid appraisal</td>
<td>Analysis of existing and accessible secondary data (no new data collection)</td>
</tr>
<tr>
<td>Comprehensive</td>
<td>Collection of additional secondary data and limited primary participatory data</td>
</tr>
<tr>
<td>HIA</td>
<td>Robust definition of risks and impacts</td>
</tr>
<tr>
<td>CHS</td>
<td>New project-specific survey data collection, including primary data from participatory studies or even cross-sectional household or biomedical studies. Analysis of specific sub-populations such as children, pregnant woman, elderly, urban and rural residents, etc.</td>
</tr>
<tr>
<td>Stakeholder imput and precedence</td>
<td>Requirements external consultant or public health support</td>
</tr>
</tbody>
</table>

(y = requires health-data collection when implementing management actions)

(z = requires health-data collection when implementing management actions)

(w = requires health-data collection when implementing management actions)
4C Guidance Note 2 – Baseline health data collection

Planning for completing the external context review on <site> to report from a point of departure on activities and achievements using well-recognised health indicators.

Outputs of the scoping process

The key output from the scoping process is a formal documented report – the Scoping Report. This report may include or be accompanied by additional outputs such as Terms of Reference for additional engagement opportunities and integration into other studies. As relevant, significant potential health impacts can be addressed without waiting for the entire process to be completed (with the legal and regulatory framework, as the external-context baseline-data-collection requirements and considerations). Seek advisory support for an outline of the methodology and tasks/activities that took place within each area of concern, key data and data gaps can be covered in surveys of this nature, having this data will facilitate communications with the communities prior to commencement of the project activities, or at a specific point of time. While not every important data gap is identified and primary-data-collection activities are required, it is important for data-collection strategies and resources employed on filling the gaps should be proportionate to the scope and scale of the possible/likely intensive and complex process, it is essential that any studies focus on collecting priority data that can inform the impact/risk assessment. The initial baseline data collected during scoping may highlight data gaps. As addressing data gaps may be a time-consuming, resource-intensive and complex process, it is essential that any studies focus on collecting priority data that can inform the impact/risk assessment. The baseline health status of the potentially affected stakeholders, prior to the development or initiation of a project, or to establish a new baseline for an existing site.

A summary of the internal context that may be relevant to a preliminary identification of potential impacts and a tentative assessment of each impact, as comparison sites (as required and relevant).

A description of specific health-related key performance indicators (KPIs), both in the potentially affected state of health and allow comparisons through future surveys or monitoring.

For the baseline health studies usually involve outsourcing to consultants or national/academic institutions.

Any commitments made to external stakeholders during the scoping exercise.

External-engagement activities that took place.

Membership of the working group.

Draft of the preliminary baseline health description, following the 12 literature review, as well as secondary and participatory data collected in the field. It is noted that this will be an iterative document that will be updated in step 2 (literature review, as well as secondary and participatory data collected in the field). A final summary on the next steps in the HIA can be proposed for early implementation.

To guide health-mitigation measures that will be implemented as part of the Community Health and Safety Area of Impact (AOI) as comparison sites (as required and relevant).

To describe specific health-related key performance indicators (KPIs), both in the potentially affected state of health and allow comparisons through future surveys or monitoring.

To provide a baseline of the health status of the potentially affected stakeholders, prior to the development or initiation of a project, or to establish a new baseline for an existing site.
When planning for baseline health studies, it is useful to think about:

Table 1 describes some important elements of baseline-data collection that should be considered, with Figure 1 an example of a modular approach to conducting a cross-sectional baseline health survey that includes a variety of indicators.

### Table 1 - Elements of health baseline information

<table>
<thead>
<tr>
<th>No.</th>
<th>Description</th>
<th>Relevant Indicators</th>
<th>Additional Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Health priorities</td>
<td>Life expectancy, maternal health, child health outcomes.</td>
<td>Health profile of the potentially affected community and the contracted workforce, especially from droplet or respiratory routes.</td>
</tr>
<tr>
<td>2</td>
<td>Socioeconomic status</td>
<td>Income, poverty, employment, education levels</td>
<td>The required level for data collection (individual, household or community)</td>
</tr>
<tr>
<td>3</td>
<td>Demographics</td>
<td>Age, gender, ethnicity, family size</td>
<td>The presence, activities and behaviours of contractors may be associated with numerous potential impacts and risks. The table below summarises the potential impacts and risks, following the AOI format.</td>
</tr>
<tr>
<td>4</td>
<td>Health and safety areas</td>
<td>Work injuries, illness, disease</td>
<td>The temporary (or mobile) contracted workforce may have a higher burden of certain communicable diseases than the communities in the surrounding areas, if contractor accommodation camps are not developed to meet the demand and make the most of the temporary economic opportunity. To meet the demand and make the most of the temporary economic opportunity, households may rent portions of their housing structure (or create backyard dwellings) to support activities that require a significant number of contractor workers. To meet the demand and make the most of the temporary economic opportunity, households may rent portions of their housing structure (or create backyard dwellings) to support activities that require a significant number of contractor workers.</td>
</tr>
<tr>
<td>5</td>
<td>Basic information</td>
<td>Contact details, addresses</td>
<td>The required data-collection tools and methods (questionnaire surveys, service and infrastructure assessment, clinical field unit, etc.)</td>
</tr>
<tr>
<td>6</td>
<td>Health outcomes</td>
<td>Prevalence, incidence, mortality, morbidity</td>
<td>The required level for data collection (individual, household or community)</td>
</tr>
<tr>
<td>7</td>
<td>Risk factors</td>
<td>Substance use, nutrition, hygiene</td>
<td>The required level for data collection (individual, household or community)</td>
</tr>
<tr>
<td>8</td>
<td>Potential impacts</td>
<td>Communicable disease owing to overcrowding and living in poor environmental health conditions that could potentially lead to an increase in communicable disease</td>
<td>Exposure to infectious agents, including pathogens, and potential transmission routes such as droplet or respiratory routes.</td>
</tr>
</tbody>
</table>

**FIGURE 1 - MODULAR APPROACH TO CONSIDERING CROSS-SECTIONAL BASELINE-HEALTH-DATA COLLECTION**
As an extension to the point discussed in the use of accommodation in the local community, as discussed in contractor workforces, especially temporary or mobile skilled/semi-skilled workers, CHSA health and safety areas may be at risk for zoonotic disease or snake bite (if attracted by increased rodent densities). The behaviour of contractors in communities may give rise to an increase in non-accidental injuries such as assault, with substance abuse a common contributing factor. Substance abuse is often a contributing factor to high-risk sexual encounters, with bars and clubs often safe havens for fraternisation. Some contractors may be attracted by increased rodent densities, and to their own health.

Localised increase in prices due to supply-and-demand economics related to the presence of the temporary (or mobile) contracted workforce may have a higher burden of STIs than the communities in the area of influence (e.g. HIV), with the potential that these can be introduced locally, or be associated with higher transmission rates at the local level. The temporary (or mobile) contracted workforce may have a higher burden of STIs than the communities in the area of influence (e.g. HIV), with the potential that these can be introduced locally, or be associated with higher transmission rates at the local level. If resettlement is effectively and sustainably implemented, there is the potential to significantly improve the living conditions in the areas of gender imbalance/inequality, poverty and lack of access to income, and to their own health.

The beneficiaries of the improved housing renting out space in the building or in backyard rentals, with the potential to increase the risk for disease transmission in communicable disease. Development of informal makeshift settlements with the potential that these can be introduced locally, or be associated with higher transmission rates at the local level. The temporary (or mobile) contracted workforce may have a higher burden of STIs than the communities in the area of influence (e.g. HIV), with the potential that these can be introduced locally, or be associated with higher transmission rates at the local level. If resettlement is effectively and sustainably implemented, there is the potential to significantly improve the living conditions in the areas of gender imbalance/inequality, poverty and lack of access to income, and to their own health.

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Housing design and town planning as above, with planning to ensure adequate supplies of potable, 

Altered access as above in 

Altered access to sources of livelihood through physical resettlement or economic displacement

CHSA

Resettlement of households and altered access may induce negative impacts through changes in 

provides an excellent 

Community

health and
safety areas
( )

Potential direct impacts Potential indirect impacts
CHSAs

No. 2.
Vector-related
diseases
 No. 3. Soil-,
water- and waste-
related diseases
 No. 5.
Food- and
nutrition-related
issues

CHSA

housing (and safety areas Community health

issues

Health-systems

practices Cultural health

behaviours and

CHSA

health determinants of

Social

issues

and safety-related

Accidents/injuries

Food- and

water- and waste-

CHSA

Vector-related

CHSA

 activities outside of the 'formal' health sector. This may lead to inappropriate care or a delay in diagnosis, or include the site activities as a barrier, or a longer travel time with inadequate roads or public transport, etc.

The location of the resettlement village may be further from arable lands or markets where goods 

may lead to food shortages or insecurity certain settings.

Effective planning and sustainable implementation may lead to a net improvement in health in 

should also include environmental hygiene and health, including solid waste management.

prevent vector-breeding sites are important to reduce the risk of vector-related conditions.

SIM are all likely to influence environmental health conditions and potentially play a role in increased communicable-disease transmission, especially via the respiratory or droplet 

SIM are likely to increase the risk of vector- 

Movement of people may introduce or continually 

reintroduce vectors 

Deteriorating environmental health conditions leading to

Potential direct (not many) and indirect risks and impacts presented in the table below (not exhaustive).

A number of direct and indirect 

induced migration

4C Guidance Note 5 – Potential direct and indirect health impacts that may be associated with site--

and can contribute to this.
and the development of unplanned informal settlements may lead to an increase in social pathologies that may increase rates of non-accidental injuries linked to crime, anti-social and criminal activities, and prostitution. Unplanned developments with poor sanitation and domestic waste management also have the potential to attract wild animals and rodents into these areas, with the risk for increased transmission of zoonotic disease or snake bite (if attracted by increased rodent densities).

Uncontrolled noise in stores, entertainment areas (nightclubs/taverns) or places of worship, etc. may increase the risk for disease transmission as the parasite may be continually introduced from other areas. This can be similar for various arboviral diseases. Reduced air quality owing to dust and burning of biomass fuels for heating/lighting/cooking. Dust may be an issue if roads are unsealed due to vehicle-entrained dust, or if the construction of the settlement is ongoing, especially if sand is used in the construction.

Disruption to traditional values and social cohesion that may create stress and potentially lead to violence owing to the mixing of cultures. Increased transport of goods and services into the area may create a situation where transport workers contribute to the development of a local sex network along their route and within site's potentially affected communities. Influx of 'outsiders' may contribute to a richer social environment through the introduction of skills or services that may not have previously been possible. Improved economic and employment (including informal) opportunities through local investment and development.

Unplanned informal settlements may influence various environmental determinants:

- Infrastructure/changes to haul or transport routes; new activities or new locations for existing activities (e.g. drilling, blasting);
- Group policies and standards; Sustainable Mining Plan; security arrangements and systems issues;
- Traditional employees and contractors, including their accommodation arrangements; planned expansion; lifecycle transitions; land-acquisition plans, changes in land use; anticipated recruitment; planned delivery of equipment and other critical supplies; planned plant and equipment; total assets; cost of capital; and environmental, health, and safety risk assessment.
- Unemployment and poverty. Where there are high unemployment and poverty levels, there is an increased potential for criminal activities. Unemployment and poverty may lead to social pathologies such as substance abuse, gender-based violence, and domestic violence. In some cases, the increased demand on ecosystem services, such as fishing, may lead to increased levels of poverty and social pathologies.
- Increased demand on ecosystem services; for example, fishing.
This section provides guidance on preparing for, and responding to, site-induced emergencies. The focus of the section is on engagement, coordination and collaboration with external stakeholders in Emergency Preparedness and Response (EPR). Participatory planning is a critical factor in helping to protect lives, safeguard the environment and minimise adverse impacts.

This section is aligned with the International Finance Corporation (IFC) Performance Standards, the World Bank General Environmental, Health and Safety (EHS) Guidelines, and the Awareness and Preparedness for Emergencies at Local Level (APELL) methodology of the United Nations Environment Programme (UNEP). This section draws heavily from the Handbook.

Performance Standards 1 and 4 require all sites to establish and maintain an emergency preparedness and response system as part of their Environmental and Social Management System. This is to ensure that sites are properly prepared to respond to emergency situations as necessary in order to prevent and mitigate harm to workers, local communities, and/or the environment.

Every site is required to develop and maintain a comprehensive Emergency Preparedness and Response Plan (EPRP) for site-induced emergencies that could affect local communities. This requirement applies across the whole life of asset, beginning in the project development stage.

Typical emergency situations arising out of site activities and that may impact on local communities include, but are not limited to:

- Mineral residue waste facilities failure
- Tailings storage facilities failure
- ...
Emergency scenarios stemming from the site's use of ancillary features (such as transmission lines, roads, rail lines, ports) must also be identified.

There are also emergency situations that are not site-induced; i.e. that do not stem from a technical failure at site. These include terrorism threats, high levels of political and social unrest, natural disasters such as earthquakes or floods, an outbreak of infectious disease, etc. The process described for emergency preparedness and response in this section could also be applied to emergencies that do not arise out of site activities.

Specifically, this section:

- outlines a process of consultation and awareness-raising to ensure local communities are prepared for potential emergencies that may affect them
- details the requirement for a multi-disciplinary emergency preparedness response plan (EPRP)
- outlines management actions and resources required for effective planning and implementation
- describes the internal and external co-ordination required to develop and implement an EPRP
- Group Safety, Health and Environment (SHE) Way
- Anglo American Mineral Residue Facilities and Water Management Structures Standard
- Group Crisis Communications Policy.
The intended users of this section are primarily the Social Performance, S&SD and Security teams with responsibility for emergency planning and response. Requires an inter-disciplinary team approach. Additionally, as part of Anglo American's commitment to zero harm, general concepts of emergency preparedness and response should be understood by all site employees, including contractors.

Relevance to other sections

Emergency preparedness and response planning is supported by other guidance in the Social Way Toolkit.

______________________________________


Social Incident and Grievance management

Stakeholder engagement (3A) – the consultation and awareness-raising process outlined in this section should be incorporated into sites’ Stakeholder Engagement Plans (SEPs). Key external stakeholders include emergency responders, relevant government authorities and affected communities.

Social and Human Rights Risk Analysis (SHIRA) (3C) – the potential adverse impacts on stakeholders arising from site-induced emergencies should be assessed annually as part of the Operational Risk Management (ORM) process.

Impact and risk prevention and management (Section 4)

Socio-Economic Development (SED) (4A) – in certain contexts, support and capacity-building for emergency responders and government agencies are key elements in an Operational Plan. These should be factored into the planning process.

Community Health and Safety management (4C) – Local capacity for emergency preparedness and response is a critical community health and safety topic and should be screened through a health lens to appropriately identify and manage associated risks.
4D.1 About Emergency Preparedness and Response planning

Contents in this section:

4D Emergency Preparedness and Response Planning

Emergency:

Several definitions of an emergency exist. In general, an emergency is defined as a serious, unexpected and often dangerous situation requiring immediate action. The World Bank General Environmental, Health and Safety (EHS) Guidelines define an emergency as "an unplanned event where a site loses control of a situation that may result in risks to human health, property, or the environment, either within the facility or in the local community". UN defines an emergency as "an event that will produce or exacerbate injury to people and/or damage to property unless immediate intervention occurs. A threatening condition that requires urgent action."

Functional exercise:

A simulated exercise with no actions in the field. The dominant feature of this exercise is the actual performance of some or all of the actions that would be required of participants in an actual emergency, except those activities that are performed at the scene of an accident. The purpose is to test planning and response capabilities of personnel and systems without actually deploying response equipment or resources; i.e. without any 'boots on the ground'. A functional exercise involves co-ordination between the company and external entities.

Field exercise:

A field exercise involves response operations conducted during a simulated emergency. The purpose of a field exercise is to rigorously test emergency capabilities of the total response system. Response equipment is deployed, realistic scenarios are used, medical personnel and equipment including operating rooms are included, etc. Field exercises involve all or most of the emergency-response functions, as well as community groups and government agencies. A field exercise is a multi-party, multi-jurisdictional, multi-disciplinary exercise, with 'boots on the ground' response. Field exercises may attract media attention.

Drill:

A drill is a type of field exercise. A drill is a co-ordinated, supervised activity usually employed to test a single, specific operation or function within a single entity (e.g. a fire department conducts a decontamination drill).


Definitions

APELL

IMPACT AND RISK PREVENTION AND MANAGEMENT

4D.1 Introduction
Emergency Response Plan (ERP): Related to Anglo American’s on-site preparation for emergencies. Contains key emergency roles and responsibilities of staff on site.

Emergency Preparedness and Response Plan (EPRP): An integrated plan that includes all aspects related to both Anglo American’s on-site preparation as well as preparation with external stakeholders. Internally, these two elements may be captured as two separate plans: an EPP, for the on-site plan, and the ERP, for external stakeholders. While some sites may find it beneficial to keep the EPP and the ERP as two separate documents, for the purposes of the Social Way both aspects must be co-ordinated in order to manage the impact of emergencies on local communities.

Site-induced emergency: An emergency caused by site activities or stemming from a technical failure at site.

Relevant international standards: For emergency preparedness and response planning, the IFC Performance Standards, the World Bank General Environmental, Health and Safety (EHS) Guidelines, and the World Bank Guidelines for Mining are all relevant and applicable.

Performance Standards 1 and 4 require all sites to establish and maintain an emergency preparedness and response system so that the company is able to respond to emergency situations associated with its site(s) to prevent and mitigate harm to workers, local communities, and/or the environment. Emergency preparedness and response plans and activities should be documented and based on the risks to community health and safety identified during the risk and impact identification process. The IFC Performance Standards and the World Bank Guidelines provide an overview of the information an Emergency Preparedness and Response Plan should contain. This includes: guidance on developing emergency plans in collaboration and consultation with potentially affected communities, governments, and other stakeholders; and requires training programmes and practice exercises to be conducted at least annually to test equipment, plans, protocols and systems to ensure an adequate level of emergency preparedness.

The IFC Performance Standards require that appropriate information about the nature and extent of environmental and human health effects that may result from emergencies at the site or caused by site-related activities is provided to potentially affected communities, relevant government agencies, emergency services, and other relevant parties. In addition, the Performance Standards state that information campaigns should describe appropriate behaviour and safety measures in the event of an emergency. Affected community and other stakeholders should be included in regular training exercises to familiarise them with proper procedures in the event of an emergency that may have an impact on them.

The Emergency Response section of the World Bank Guidelines for Mining refers to the process, which sets out a 10-step process required for the development of an integrated and functional emergency response plan involving local communities, governments, emergency responders, and others.

Lifecycle planning: Emergency Preparedness and Response planning is applicable to any phase of an asset lifecycle. Potential emergency scenarios related to new activities, procedures and systems introduced for closure execution and subsequent monitoring and maintenance must be understood and the
Plan formulation - Plans must be in place through each phase of closure to keep potentially affected communities informed about the potential emergencies that could affect them, how they should respond and where to get more information during an emergency.

Options analysis - Options analysis for post-mining land uses (see MCT Tool 1) should consider potential emergency scenarios associated with each land use option and the required management actions to address them.

Emergency preparedness and response planning - Emergency preparedness and response planning will only end when a site has been successfully relinquished and monitoring and evaluation results have demonstrated there are no remaining closure liabilities linked to potential emergency scenarios.

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This section outlines a step-by-step guide to emergency preparedness and response planning for the site-induced emergencies that may impact on local communities. Anglo American's Social Way follows the Plan Do Check Act (PDCA) management method. To be successful in implementing this method, both financial and human resources are required. Engagement with a range of stakeholders is mandatory across the cycle. Key tasks during each stage are shown in Figure 4D.1 and discussed in the sub-sections below.

1. Assess potential impacts in detail
2. Develop a co-ordinated approach with key external stakeholders
3. Assess local capacity for emergency response
4. Conduct stakeholder engagement

5. Update SHIRA
6. Develop an Emergency Preparedness and Response Plan (EPRP)

9. Adjust
10. Report
Figure 4D.1 The cycle as relevant to emergency preparedness and response planning

7. Conduct training, functional and field exercises
8. Conduct an evaluation
Task 1 – Assess potential impacts in detail

Contents in this section:
Task 1 – Assess potential impacts in detail
Task 2 – Develop a co-ordinated approach with key external stakeholders
Task 3 – Assess local capacity for emergency response
Task 4 – Conduct stakeholder engagement

For each emergency that may impact on local communities, sites should assess the size and nature of the off-site area potentially affected, prepare inundation/impact maps where relevant, assess the number of people potentially impacted, including their location, vulnerability (see Section 2), and the type of impact (physical harm, toxic, chronic, etc.).

The type of impact can also be secondary or indirect; for example, in the case of a tailings storage facility failure that results in the pollution of waterbodies, which contaminates drinking water and has a negative effect on the livelihoods of local fishermen.

A site's activities typically rely heavily on the use of public roads. In such cases, sites have an important role and responsibility in preventing road accidents in order to protect community residents as well as their own workers. This is particularly important where infrastructure is of poor quality, where driver behaviours, regulations and enforcement of road safety rules are weak, and where inadequate emergency response infrastructure to respond to traffic accidents involving trauma cases and other serious injuries has been identified.

Sites should implement off-site driver and traffic safety programmes proportional to risks and potential impacts. The site's EPRP should include relevant scenarios for off-site traffic emergencies. This requires an understanding of the main transport routes used, response times, average timing and routes to primary care facilities, sensitive receptors (humans, environment, and property) along the route, locations where serious accidents can and do occur, which types of accidents can and do occur, who and what could be affected, what damage could be caused, etc. Contingencies for emergency assistance to the driver and to third parties should be addressed in the EPRP. Vehicles may need to be equipped with necessary response tools, and drivers may require first aid training.

BOX 4D.3 Off-site traffic accidents and EPRPs
Task 2 – Develop a co-ordinated approach with key external stakeholders

Contents in this section:
Task 1 – Assess potential impacts in detail
Task 2 – Develop a co-ordinated approach with key external stakeholders
Task 3 – Assess local capacity for emergency response
Task 4 – Conduct stakeholder engagement

Typically, government agencies, including national government and local agencies, have the statutory accountability and legal responsibility to respond to the off-site impacts of site-induced emergencies. Local emergency-response providers, environmental agencies, the local planning authority, etc. also have roles and responsibilities related to responding to such emergencies. An effective and co-ordinated emergency response, involving multiple external agencies and other stakeholders, should be planned for. The site may not be responsible for responding to the off-site impacts of a site-induced emergency; however, it must understand which entities are responsible for such response and establish ways to effectively communicate and co-ordinate as needed.

To ensure the site's suitability to the local context, it is essential to work with local stakeholders and understand and assess the features of the emergency preparedness and response system present within the region (if present at all). It is important to understand the kinds of emergencies the current off-site emergency response system is designed to address (spill, clean-up, management of waste capacity), as well as the capacity of first responders and primary treatment facilities to respond to potential exposures, injuries and deaths.

To achieve this, the site should engage with key external stakeholders, such as those responsible for responding to emergencies and those who have a legitimate interest in preparing and planning for the identified emergencies, including those potentially affected by an emergency.

The objective of engagement and co-ordination with external stakeholders includes:

- Ensuring an adequate understanding of key external stakeholders of the potential site-induced emergencies that may have an impact on local communities
- Reviewing and improving the assessment of identified site-induced emergencies, including associated controls
- Ensuring that the site's legal obligations relating to emergency responsiveness are met in full.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
The list of key external stakeholders depends on context, but typically includes: emergency-response providers; environmental authority; the local planning authority; mine inspectorate; agencies with responsibility for fire, health, water quality, air quality; police; other mining companies or other large facilities in the area; local/regional hospital; transport authorities and operators; relevant NGOs and other local organisations; and leaders of communities that may be impacted by a site-induced emergency.

Open and informed communication and engagement with such key external stakeholders results in better emergency response. It is best practice to establish an emergency co-ordination group with key external stakeholders to regularly discuss emergency preparedness and response planning.

Various key external stakeholders are likely to have their own emergency plans that go into effect in case of a site-induced emergency with off-site impacts. Emergency plans may exist as regional and local government plans, police and fire plans, hospital plans, army disaster-response plans, etc. These plans should be identified, and it should be determined whether these plans, jointly, adequately address the identified emergency scenarios.

Based on engagement with key stakeholders, a description of all external-emergency participants, their roles and resources, including gaps and overlaps and unclear roles and responsibilities in each emergency scenario, should be identified. It is important to collectively identify missing or weak elements or emergency-response tasks not being covered by anyone, as well as additional tasks that need to be undertaken to complete or improve emergency response, based on a shared understanding of what must be done in each emergency scenario and taking into account the authority and jurisdiction of the various parties.
As mining exploration and operational activities tend to occur away from city centres, the local capacity to respond to emergency scenarios is an important consideration. While a site may have a good plan in place, implementation may hinge on the capacity of a locality, region, or even nation, to respond.

A site may be located in a remote area where infrastructure and government presence, capacity and resources are weak. In such cases, the site will have to provide the majority of the resources required to deal with emergencies. Other sites may be located in highly developed areas with efficient and numerous well-resourced government-led emergency services. A detailed assessment of capacity should be undertaken. If the local emergency-response system plays a role in response efforts, but its capacity is limited, capacity building should be prioritised.

Guidance on how to conduct a capacity assessment is included in Section 4 (see 4D.4 Tools).
Engaging with potentially affected communities reduces community concerns about the operation, ensures that communities have an adequate understanding of the operation and associated risks, and ensures that communities know what to do in case of an emergency. This process should be incorporated into sites' Stakeholder Engagement Plans (see Section 3A).

Each member of the potentially affected community, including vulnerable groups who may be affected by an emergency, must:

This should be achieved through regular awareness-raising campaigns, training, and involving communities field exercises as appropriate, to ensure they are familiar with the procedures that apply in the event of an emergency that may affect them.

Engagement with potentially affected communities and other key external stakeholders is not a one-off event but should be ongoing (at least annually) and be commensurate to the level of risk and impact and the interest of and concerns raised by the potentially affected communities and other external stakeholders.

Engagement should also be triggered by relevant (anticipated) changes at site (such as waste rock dump expansions, change in transportation routes, etc.), a change in demographics and/or land use in potentially affected communities (such as an expansion of the potentially affected communities due to site-induced migration), a change in regulations, be informed of emergencies that may impact on them, including the nature and extent of associated environmental and health impacts

know what the warning signs for an emergency are

what to do during each emergency scenario

where/how to get information during an emergency.
Task 5 – Update SHIRA

Contents in this section:

Task 5 – Update SHIRA
Task 6 ‒ Develop an Emergency Preparedness and Response Plan

Sites should incorporate potential impacts on a local community as a result of site-induced emergencies in the Baseline WRAC, taking a worst-case/catastrophic-scenario approach, and identify appropriate mitigations and controls to prevent, mitigate, and manage such impacts (see Section 3C). Reputational, financial, and legal risks to the business in relation to site-induced emergencies that could impact on local communities should also be included.

SHIRA
4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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W
Task 6: Develop an Emergency Preparedness and Response Plan

Contents in this section:

Task 5 – Update SHIRA

Task 6: Develop an Emergency Preparedness and Response Plan

All sites are required to develop an Emergency Preparedness and Response Plan (EPP) for site-induced emergencies that may impact on local communities. The plan should take into account the information collected in Tasks 1, 2, 3 and 4.

For the purposes of this guidance, an emergency plan refers to an integrated plan that includes all aspects related to both Anglo American on-site preparation as well as preparation with external stakeholders. Internally, these two elements may be captured as two separate plans: an Emergency Response Plan (ERP), for the on-site plan, and an Emergency Preparedness Plan (EPP), for external stakeholders. While some sites may find it beneficial to keep the ERP and the EPP as two separate documents, for the purposes of the Social Way both aspects must be co-ordinated to effectively manage the impact of emergencies on local communities.

Each emergency scenario that could impact on local communities should be covered separately in the site’s EPP, and include the population and residential centres at risk, maps of communities, and likely impact area for each emergency scenario. A site may also have a specific plan for each emergency scenario. For the purpose of this guidance note, we refer to ‘the site’s plan’.

For each emergency scenario, the following should be identified:

- Roles and responsibilities in the various emergency scenarios, for internal and external stakeholders as identified in planning and engagement activities.
- These should include roles and responsibilities to alert and communicate with the authorities and with affected communities. For example, depending on jurisdiction and context, it may not be the responsibility of the site to alert affected communities. In any case, this requires agreement from local authorities.
- Assigning roles and responsibilities across key internal and external stakeholders should take account of authority, jurisdiction, expertise, capacity, and available resources. This requires agreement from local authorities.
- Establishing a clear command structure between internal and external stakeholders in each emergency scenario.
For more information about the contents of an EPRP, please refer to the Anglo American Emergency Management Standard and the Emergency Response Plan Specification available on the Eureka Standards HUB.

Emergency preparedness and response planning involves a co-ordinated, cross-functional approach; it is critical that the scenario is key. This requires agreement from local authorities.

A contact roster of appointed individuals, with alternates, within local authorities, community leaders, and nearby residents that should be notified in case of emergency. This requires agreement from local authorities and other stakeholders. The list should include the name, description, location, and contact details (telephone, email) for each individual, and be confirmed annually (or twice per year for mineral residue waste facilities, tailings storage facilities and/or water storage dams rated as major on the Anglo American Consequence Classification of Structures (CCS) ratings system or those rated high for human and environment consequences).

Emergency notification and communication systems in place to alert and communicate with affected communities to inform them of the details and nature of the emergency, options for protection (such as evacuation, shelter, escape routes, etc), and to ensure they keep receiving accurate and timely information throughout the duration of the emergency and rehabilitation. This should include communication systems for vulnerable groups. Depending on jurisdiction and context, it may not be the responsibility of the site to alert and/or communicate with affected communities. In such cases, the site should know who is responsible for alerting and/or communicating with affected communities.

To alert and communicate with relevant local authorities, including emergency, health, and environmental authorities and other key external stakeholders. Relevant authorities may include those who need to be notified for legal or permitting reasons, as well as those who are involved in responding to the emergency. Triggers for alerting the relevant authorities and affected communities (as appropriate) should be included.

Procedures for safeguarding potentially affected communities and vulnerable groups in particular, including evacuation routes, shelter and assembly points. Procedure for notifying families of those injured, and key messages. Process to assist in off-site emergency response Options for deploying site emergency-response teams to the off-site area to assist in emergency response. This may not be allowed in all jurisdictions. Options for providing other off-site support and clean-up plan in terms of emergency shelter, water supply, environmental rehabilitation, etc. Immediate and long-term off-site emergency response and rehabilitation efforts should be assessed and designed to ensure that they do not cause or exacerbate negative impacts.

The frequency and type of training, Functional and Field Exercises. Triggers for new drills should be included. Triggers for review and updating of the EPRP. This should include the frequency of reviews in the absence of material changes, and a list of triggers that could affect emergency preparedness and response and, therefore, should lead to a review of the EPRP.

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Task 7 – Conduct training, functional and field exercises

Contents in this section:

Task 7 – Conduct training, functional and field exercises
Task 8 – Conduct an evaluation

It is critical that all relevant internal and external stakeholders are aware of their collective and individual responsibilities, and that regular training is provided. Internal training should enable site workers and contractors to understand the local context for emergency preparedness and response and to ensure emergency preparedness and response efforts are as effective as possible. Training should reflect core knowledge and competencies expected for response to potential emergency scenarios. Training should include functional and field exercises to test the different scenarios outlined in the Anglo American Consequence Classification of Structures (CCS) ratings system or those rated high for human and environment consequences, field exercises are to be carried out at least once every five years. Training activities and the outcomes of the training should be documented. Upon completion of a functional exercise or field exercise, the site and external stakeholders such as the relevant local emergency response service providers should evaluate what worked well and what aspects require improvement.
After completion of a functional or field exercise, and in case an emergency occurs, the site should conduct a post-drill or post-emergency evaluation, which should include a review of whether the emergency response was conducted according to plan, what worked and what didn’t, lessons learned, etc. The review should incorporate the views of affected communities, local emergency service providers, and other relevant external stakeholders. The review should also draw upon the results of the investigation conducted on the incident. The results of the review should be documented and inform the updating of the [LFI EPRP].

For more information about evaluating functional and field exercises, please refer to the Emergency Management Standard and Emergency Training and Simulations Specification available on the Eureka Standards HUB.
In order to ensure that the site's information remains current, it should be reviewed and updated at least annually to ensure appropriate contact information is relevant. Additional triggers for reviewing and updating the information include:

- It is best practice to also develop an overall, integrated emergency preparedness and response plan officially signed off by the site, the community, local government, and other appropriate agencies.

EPRP information collected through Task 3 regarding (gaps in) roles and responsibilities in addressing off-site emergencies.

EPRP information collected through Task 4 regarding capacity of local emergency-service providers.

Findings from drills and field and functional exercises (see 4D.3 Task 6).

Findings from actual emergencies (see 4D.3 Task 7).

Expansion of the mine and/or its associated facilities.

A near-miss incident.

The use of new transport routes.

A new community being potentially affected.

Significant changes in the context or size of potentially affected communities.

A significant change in the capacity or resources of key emergency providers or other key stakeholders.

The development of new industry in the vicinity of the mine.
Results of monitoring and evaluating and any adjustments made to manage potential emergencies should be regularly reported to internal and external stakeholders through the SPMC and CEF or equivalent structures, as appropriate.
### Management and resources

Table 4D.1 lays out typical roles and responsibilities in managing emergency preparedness and response planning. Sites have the responsibility to engage with local authorities, local institutions and the population at risk.

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
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<tbody>
<tr>
<td></td>
<td>GROUP</td>
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<td></td>
<td>Group Social Performance Principal/Environment, Health, and Safety</td>
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<td>BUSINESS UNIT</td>
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<td></td>
<td>Government Relations Manager</td>
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<td>SITE SOCIAL PERFORMANCE TEAM</td>
<td>Social Performance Manager</td>
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<td></td>
<td>Provides advice and input on how to meet Performance Standards, especially 1 and 4, and relevant international practice</td>
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<td>Ensures appropriate capacity and expertise are available to site</td>
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<td>Support for live drills and review</td>
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<td></td>
<td>Provides advice on national health and safety legislation and regulations</td>
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<td></td>
<td>Acts as contact point with regional and national authorities</td>
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<td>Receives regular updates through quarterly reports</td>
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<td>Engages, builds and maintains relations with local authorities</td>
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<td></td>
<td>Builds and maintains relations with local communities</td>
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<td>Co-ordinates input from external stakeholder in response plans</td>
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<td></td>
<td>Co-ordinates input from other departments, including through the establishment of a (part-time) cross-functional team</td>
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<td></td>
<td>Undertakes a risk assessment with cross-functional team</td>
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<td>Participates in the development of plans to ensure consistency of relations with</td>
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## Impact and risk prevention and management

### 4D Emergency Preparedness and Response Planning

1. **Management and resources**
   - **Introduction**
   - **Guidance**
   - **Management and resources**
   - **Tools**
<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITE MANAGEMENT</td>
<td>General Manager/HoDs</td>
<td><strong>Develops the required input related to community aspects and awareness for the EPRP</strong>&lt;br&gt;<strong>Adapts the EPRP as needed</strong>&lt;br&gt;<strong>Designates representatives from relevant departments to support EPRP</strong>&lt;br&gt;<strong>Accountable for development, delivery and maintenance of the EPRP</strong>&lt;br&gt;<strong>Ensures training for entire workforce</strong>&lt;br&gt;<strong>Supports the development and implementation of the EPRP</strong></td>
</tr>
</tbody>
</table>
4D Tool 1 – Guidance on conducting a capacity assessment of local emergency service providers

Undertaking a capacity assessment of local emergency service providers is essential to identifying gaps in potential response efforts. The assessment enables an accurate overview of current capacity to respond to potential and real emergency scenarios that will vary in scale (e.g. localised chemical spill, or a large-scale disaster) and is adapted from the World Health Organisation's toolkit for assessing health-system capacity for crisis management.

The assessment involves four main steps, which are as follows:

Step 1. Investigate local capacity using questionnaire matrix

Six components require investigation as part of a local capacity assessment, including:

- Anglo National and regional governance
- Human resources
- Financial resources
- Supplies and equipment
- Information sharing and communication
- Emergency service delivery

To undertake Step 1, the following questionnaire matrix can be used. The assessment should be completed by an Anglo National and regional governance.
American site member who holds responsibility for emergency preparedness and response planning, in collaboration with the community health and safety delegate. During the assessment, it is essential to take detailed notes on responses.

### NATIONAL AND REGIONAL GOVERNANCE

1. Is there national legislation related to all phases of emergency management?
2. Are procedures for declaring and terminating a state of emergency at all jurisdictional levels defined in the legislation?
3. Does the national structure for emergency management and co-ordination consist of a multi-sectoral committee or a national level entity with clearly defined roles and responsibilities?
4. Is the health sector present on such a committee?
5. Are national and regional resources allocated to support disaster-risk reduction and/or emergency preparedness and response?
6. Are there any regulations relating to the entry of foreign workers to provide emergency services?
7. Are emergency relief items exempt from import taxes?
8. Do existing mechanisms of emergency co-ordination and partnership agreements exist with entities in the public/private sector and civil society?
9. Has a national or regional disaster/emergency risk-reduction programme been established?
10. If so, has it defined risk-prone populations and facilities using a risk-assessment approach?
11. Is the programme resourced to address vulnerabilities and reduce risk?
12. Do emergency preparedness resources include an information system and database which is maintained and up to date?
13. Are exercises and drills developed, undertaken and evaluated?
14. Does the programme involve co-ordination, monitoring and regular reporting?
15. Is there a national emergency preparedness and response plan developed and based on an all-hazards approach with risk assessment?
16. Is the plan tested through exercise, drills and simulations?
17. Is the plan updated?
18. Is the plan publicly available?
<table>
<thead>
<tr>
<th>NATIONAL AND REGIONAL GOVERNANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the plan define activation, co-ordination and incident-command mechanisms?</td>
</tr>
<tr>
<td>Are guidelines for emergency management developed, updated and disseminated to all relevant stakeholders?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HUMAN RESOURCES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does an plan for emergency management exist and, if so, is it based upon defined competencies?</td>
</tr>
<tr>
<td>Is there a maintained database of staff trained in emergency management?</td>
</tr>
<tr>
<td>Do procedures exist for integrating national and international volunteers into service delivery in emergency situations?</td>
</tr>
<tr>
<td>Do training programmes exist and, if so, are they developed based on needs assessments?</td>
</tr>
<tr>
<td>Does a training plan exist for potential emergency scenarios?</td>
</tr>
<tr>
<td>Are funds available for the multi-sectoral preparedness, and management of emergencies at the national and regional level?</td>
</tr>
<tr>
<td>Do multi-sectoral financing mechanisms include contingency funding for response and recovery at the national and regional level?</td>
</tr>
<tr>
<td>Are multi-sectoral financing procedures available for the request, acceptance and utilisation of international financial assistance?</td>
</tr>
<tr>
<td>Do financing mechanisms include a budget for risk-reduction programming?</td>
</tr>
<tr>
<td>Do financing mechanisms include effective and rapid recovery for loss and damage to critical facilities (e.g. health facility)?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>MEDICAL AND LABORATORY SUPPLIES AND EQUIPMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are essential medical supplies and equipment and essential pharmaceutical supplies readily available in sufficient quantities?</td>
</tr>
<tr>
<td>Are medical supplies periodically tested and, when expired, disposed of appropriately?</td>
</tr>
<tr>
<td>Are medical supplies and equipment maintained with rotation and safe stockpiling of medical supplies?</td>
</tr>
<tr>
<td>Question</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Is there a system in place for the distribution of medical supplies and equipment in the event of a health-sector emergency?</td>
</tr>
<tr>
<td>Do procedures exist for the procurement of medical supplies that are not normally on the list of basic equipment?</td>
</tr>
<tr>
<td>Are essential laboratory supplies and equipment for emergency operations determined based on risk assessment?</td>
</tr>
<tr>
<td>Are they readily available in sufficient quantities?</td>
</tr>
<tr>
<td>Are laboratory supplies and equipment tested and when expired disposed of appropriately?</td>
</tr>
<tr>
<td>Do procedures exist for the exceptional procurement of laboratory supplies and equipment?</td>
</tr>
<tr>
<td>Are the safe transport and export of biological and environmental specimens for testing and or/confirmation by national and international reference laboratories assured?</td>
</tr>
<tr>
<td>Are essential supplies and equipment for blood services determined based on risk assessment?</td>
</tr>
<tr>
<td>Are blood supplies readily available in sufficient quantities?</td>
</tr>
<tr>
<td>Are arrangements in place for the rapid and exceptional collection, storage and distribution of blood in place in accordance with established guidelines?</td>
</tr>
<tr>
<td>Do procedures exist for the exceptional procurement of laboratory supplies and equipment for blood services?</td>
</tr>
<tr>
<td>Is the safety of blood and blood products (and their safe disposal) ensured in accordance with established guidelines?</td>
</tr>
<tr>
<td>Are responsibilities and authority related to an information system defined?</td>
</tr>
<tr>
<td>Do protocols exist for the collection, management, analysis and dissemination of the necessary data for conducting risk assessments and performing emergency preparedness planning?</td>
</tr>
<tr>
<td>Does a national profile of health risks exist and, if so, is it based on disaggregated data?</td>
</tr>
<tr>
<td>Are the triggers for switching from routine to emergency reporting defined?</td>
</tr>
<tr>
<td>Have information mechanisms been established at the community level and are trained staff available?</td>
</tr>
<tr>
<td>Do emergency managers have access to relevant data?</td>
</tr>
<tr>
<td>Question</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>INFORMATION SHARING AND COMMUNICATION</strong></td>
</tr>
<tr>
<td>Are epidemic-related intelligence activities being carried out (baseline estimates, trend analysis, thresholds for alert and action, etc)?</td>
</tr>
<tr>
<td>Is early-warning capacity in place to enable recognition of and reporting on any event of potential public health concern within 24 hours?</td>
</tr>
<tr>
<td>Does health surveillance have standardised protocols defining roles, responsibilities, and procedures related to the standardisation, collection, management, analysis and dissemination of data?</td>
</tr>
<tr>
<td>Does the surveillance system have data-sharing protocols with other related entities?</td>
</tr>
<tr>
<td>Does an emergency reporting system exist?</td>
</tr>
<tr>
<td>Are resources and trained staff available?</td>
</tr>
<tr>
<td>Is data from all relevant stakeholders collected through the emergency reporting system?</td>
</tr>
<tr>
<td>Are communication strategies developed that are culturally appropriate and based on risk assessment findings?</td>
</tr>
<tr>
<td>Are co-ordination mechanisms in place for involving stakeholders in the formulation of information for the public and media to ensure consistency in messaging?</td>
</tr>
<tr>
<td>Do procedures exist for the dissemination of information?</td>
</tr>
<tr>
<td>Is information regarding ongoing emergency preparedness activities systematically communicated to the public and media?</td>
</tr>
<tr>
<td>Are specific strategies in place that target minority and vulnerable populations?</td>
</tr>
<tr>
<td>Has information on specific risks and self-protection measures for responders involved in emergency operations been prepared?</td>
</tr>
<tr>
<td>If so, is it regularly updated and disseminated?</td>
</tr>
<tr>
<td>Do emergency telecommunications exist?</td>
</tr>
<tr>
<td>Do protocols exist for, and have staff been trained on, the use of emergency telecommunications equipment?</td>
</tr>
<tr>
<td>Are adequate resources available for emergency telecommunications?</td>
</tr>
<tr>
<td><strong>EMERGENCY SERVICE DELIVERY</strong></td>
</tr>
<tr>
<td>Do mechanisms and resources exist for carrying out a rapid impact assessment for disasters?</td>
</tr>
</tbody>
</table>
Is the health sector involved in planning, preparation and implementation of rapid impact assessments for disasters?

Do professionals receive appropriate training to carry out rapid impact assessments for disasters?

Is there a system in place for medical evacuation and dispatch to appropriate health facilities?

Do search and rescue operations exist? If so, do they include a medical component?

Are there specific arrangements in place for pre-hospital handling of patients with epidemic potential?

Are mechanisms in place to assure displaced populations have access to basic services and essential health programmes?

Are mechanisms in place to establish mobile teams that operate outside the existing health facility if needed?

Are mechanisms in place to ensure efficient monitoring of the health status of people living in temporary settlements?

Are mechanisms in place to ensure adequate sanitary and personal hygiene for displaced populations?

Are mechanisms in place to address cultural and language barriers to access needed services?

Do procedures and facilities exist for the safe disposal of medical waste in emergencies?

Do procedures exist for the safe disposal of non-medical waste in emergencies?

Do hospitals have planning committees and plans for emergency response and recovery?

Are staff assigned to the programme?

Do fire engines/trucks and ambulances exist within the local area?

Are first-responder vehicles in good working condition and maintained?

Are first responders able to respond to current conditions in a timely manner?

Do first responders have the space in their general response day to accommodate extra pressures?

Are first responders trained to respond to potential emergency scenarios identified?

Are first responders able to transport victims to a primary care facility in an appropriate time?
**EMERGENCY SERVICE DELIVERY**

- Are there mechanisms in place for identifying victims and tracking missing persons?
- Are there mechanisms in place for the storage and release of corpses?
- Are there mechanisms in place for informing the public about the deceased?
- Has surge capacity been provided for with respect to forensics and mortuaries?
- Are there mechanisms in place for assisting in victim identification if needed?
- Is the security of healthcare facilities guaranteed during emergencies?
- Have transportation and fuel requirements for emergencies been considered in planning?
- Do guidelines exist for the establishment and operation of temporary health facilities?
- Are resources available for establishing temporary facilities?

**Step 2. Summarise findings and gaps**

Once the assessment is complete, main findings and gaps identified require summary using the following table.

<table>
<thead>
<tr>
<th>Component</th>
<th>Main Findings and Gaps</th>
</tr>
</thead>
<tbody>
<tr>
<td>National and regional governance</td>
<td></td>
</tr>
<tr>
<td>Human resources</td>
<td></td>
</tr>
<tr>
<td>Financial resources</td>
<td></td>
</tr>
<tr>
<td>Supplies and equipment</td>
<td></td>
</tr>
<tr>
<td>Information sharing and communication</td>
<td></td>
</tr>
<tr>
<td>Emergency service delivery</td>
<td></td>
</tr>
</tbody>
</table>

**Step 3. Prioritise gaps**

A risk registry is then developed based on gaps. Identified gaps are prioritised and actioned through a risk-assessment process. Each gap should be evaluated based on the risk-assessment matrix provided to ensure critical issues are resourced appropriately. Gaps that are catastrophic in nature should be eliminated.
<table>
<thead>
<tr>
<th>M</th>
<th>a</th>
<th>?</th>
</tr>
</thead>
</table>

References:
4E Security Management and the Voluntary Principles on Security and Human Rights (VPSHR)

Contents in this section:

4E Security Management and the Voluntary Principles on Security and Human Rights (VPs)

4E.1 About Security Management and the VPs

This section provides guidance on identifying and mitigating potential social and human rights impacts on external stakeholders related to a site's security arrangements. The focus of this section is not on protecting or securing a site and its workers, but rather avoiding harm to, or conflict with, external stakeholders caused by public or private sector security. This section therefore outlines a cross-functional approach with an emphasis on coordination and collaboration between security (or protection services) and social performance functions.

This section is aligned with IFC Performance Standards (IFC PS), the Voluntary Principles on Security and Human Rights (VPs) and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Established in 2000, the Voluntary Principles on Security and Human Rights (VPs) are a set of principles designed to guide companies in maintaining the safety and security of their operations within an operating framework that encourages respect for human rights. Anglo American is a participant in the VPs.

IFC Performance Standard 4

IFC Performance Standard 4 requires companies to consider the impacts their security arrangements might have on local communities and:

- assess potential impacts posed by its security arrangements to those within and outside the project site
- assess and document risks and/or impacts arising from the site's use of government security personnel deployed to provide security services for the site.
- investigate allegations of unlawful acts by security personnel.

Box 4E.1 Voluntary Principles on Security and Human Rights (VPs)

Specifically, this section:

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4E.1 Introduction

...
Intended users

The intended users of this section are primarily the social performance, security, and risk management teams. Other functions, notably legal, supply chain, international government relations and S&SD, should be aware of security arrangements and associated risks and impacts. Contractors, especially security contractors, also need to be aware of the guidance in this section.

Relevance to other sections

Planning for and management of security involves several Social Way guidance sections:

- Describes the range and nature of potential security-related social and human rights impacts and risks
- Details the requirement to assess potential security-related social and human rights impact and risks
- Outlines the coordination and cross-functional collaboration required to prevent and manage potential social and human rights impacts and risks
- Provides guidance on contractual language for contracts with private security
- Provides guidance on working towards a Memorandum of Understanding with public security forces
- Provides guidance on human rights-focused training programs for security providers

Governance

Section 1

Social Performance Management Committee (SPMC) – security management is cross-functional and requires both coordination and collaboration between different departments. The SPMC provides the primary mechanism for ensuring that security provision is understood by all relevant functions.

Section 2

Review and Planning: The internal and external context review provides information needed for the annual security assessments.

Section 3

Engagement and Assessment:

- Stakeholder Engagement (3A) – engagement with local communities helps sites understand security-related concerns. Public and private security providers are key stakeholders and should be included in stakeholder mapping and engagement processes.
- Incident and Grievance Management (3B) – complaints about a site’s security arrangements may be lodged via the site’s grievance process. Security-related grievances and incidents should be investigated as per the guidance in Section 3B.
- Social and Human Rights Impact and Risk Analysis (3C) – potential social and human rights risks and impacts related to public or private security providers should be included in the Baseline WRAC.

Section 4

Impact and Risk Prevention and Management:

- Contractor Social Management (4B) – all private security providers should be procured following the Group Contractor Performance Management Standard.
Community health and safety — potential community health and safety related risks and impacts related to a site's security arrangements must be assessed and managed.

Conflict management — public or private security providers are likely to be stakeholders in conflict management and may also be targets if there is a conflict between the site and local communities.

Artisanal and Small-Scale Mining — any security arrangements that are part of management actions to avoid or manage artisanal and small-scale mining at a site must meet the VPSHR requirements.
Effective security management is underpinned by two inter-related objectives: the protection of the site, its workers and property; and avoiding adverse social and human rights impacts on external stakeholders resulting from a site's security arrangements.

Anglo American bears varying degrees of responsibility for the actions and behaviour of private and public security acting on its behalf or as a result of its presence. If excessive force is employed by public security forces, for example to clear land or to disperse a protest, a site may be linked to these human rights abuses. A site's presence may lead to greater public security or military forces being deployed in the site's vicinity, which may result in local communities (in particular vulnerable groups) feeling threatened or intimidated. Conversely, site induced in-migration related to an Anglo American operation may stretch public sector security forces meaning they are less able to fulfil their duties.

Table 4E.1 provides an overview of potential security risks to the site, and potential social and human rights impacts caused by a site's private and/or public security providers. Therefore, sites should not only assess risks to the site, but also assess the potential adverse social and human rights impacts of the site's security context and security arrangements, as required by the VPs. This section is designed to be fully aligned with the requirements of the VPs. Sites do not need to conduct a separate VPs risk assessment.

### TABLE 4E.1 Principal security threats and impacts

<table>
<thead>
<tr>
<th>Potential security risks to site</th>
<th>Potential social and human rights impacts caused by a site's private and/or public security providers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trespassing</td>
<td>Restricted access to certain areas</td>
</tr>
<tr>
<td>Theft of site property</td>
<td>Excessive use of force by private or public security</td>
</tr>
<tr>
<td>Damage to site property</td>
<td>Local communities feeling threatened or intimidated by security forces</td>
</tr>
<tr>
<td>Attacks on site staff</td>
<td>Public/private security forces using site material or equipment to commit human rights abuses</td>
</tr>
<tr>
<td>Kidnapping/hijacking/hostage taking of site staff</td>
<td>Public/private security forces confiscating material/property of trespassers or ASM, and benefitting from onward sale</td>
</tr>
<tr>
<td>Terrorism</td>
<td>Inappropriate behaviour on the part of public/private security providers, including harassment and discrimination when acting on behalf of the site</td>
</tr>
</tbody>
</table>

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<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4E.1</td>
<td>Introduction</td>
</tr>
<tr>
<td>4E Security Management and the Voluntary Principles on Security and Human Rights (VPSHR)</td>
<td></td>
</tr>
<tr>
<td>4E.1</td>
<td>About Security Management and the VPs</td>
</tr>
<tr>
<td>Contents in this section:</td>
<td></td>
</tr>
</tbody>
</table>
Lifecycle Planning

Security management is a critical issue from Discovery through to Post-Closure.

Extortion, bribery and corruption
Illegal mining
Illegal occupation / squatting on mining lease
Harassment, discrimination or arbitrary arrests or detention of community members by public security forces, for example following a protest against a site or following allegations of theft of site property or trespassing on the site

Requirements for assessment and management of security related social and human rights impacts on stakeholders do not change as the site moves into the closure execution phase (decommissioning phase), and subsequent monitoring and maintenance phase. However, resourcing should be reviewed as the site moves through each stage of closure. During the monitoring and maintenance phase, when there is a much smaller physical presence on site, some aspects of site security management may transfer to level or to another nearby site.

Options analysis for post-mining land uses (see MCT Tool 1) should consider potential security related impacts and risks, and the required management actions to address them. Potential increased security risks around the site post-closure due to a decreased presence of personnel on the site should also be assessed and appropriate controls put in place as activities ramp down.

Box 4E.2 Closure Planning: Social transition
The Social Way follows the Plan Do Check Act (PDCA) management technique. The guidance in this sub-section is structured accordingly. For the purposes of this section, encompasses the assessment of security risks and impacts, prevention and mitigation measures and monitoring and evaluation. The tasks outlined under are not strictly chronological and may overlap.

1. Conduct stakeholder engagement
2. Review external context
3. Review internal context
4. Update SHIRA
5. Develop Security Management Plan
6. Procure private security services
7. Train private security staff
8. Work with public security forces
9. Develop a procedure for equipment transfer
10. Monitor and evaluate
11. Adjust
12. Report
FIGURE 4E.1 The cycle as relevant to Security and the VPSHR PDCA
The PLAN stage incorporates the elements required to conduct a VPs-aligned security assessment.

**Task 1 – Conduct stakeholder engagement**

Understanding the external context and any potential security-related social and human rights impacts is strengthened through regular engagements with a range of stakeholders. Table 4E.2 provides an overview of key stakeholders and the objectives of engagement. Different functions may lead on engagement with certain stakeholders according to their areas of competence.

*Section 3A provides guidance on stakeholder engagement. Discussions relating to security should be incorporated into the site’s stakeholder engagement plan (SEP).*

<table>
<thead>
<tr>
<th>Key stakeholder</th>
<th>Engagement objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local communities</td>
<td>Security issues should be incorporated into sites’ stakeholder engagement processes with a view to communicating arrangements and identifying/mitigating impacts. Engagements should gather information about:</td>
</tr>
<tr>
<td>Public security</td>
<td>Building solid relationships and understanding the capacities and attitudes of public security providers towards local communities are essential. The objectives of engagement include:</td>
</tr>
</tbody>
</table>

4. **IMPACT AND RISK PREVENTION AND MANAGEMENT**

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### TABLE 4E.2 Key stakeholders and engagement objectives

<table>
<thead>
<tr>
<th>Key stakeholder</th>
<th>Engagement objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local communities</td>
<td>Security issues should be incorporated into sites’ stakeholder engagement processes with a view to communicating arrangements and identifying/mitigating impacts. Engagements should gather information about:</td>
</tr>
<tr>
<td>Public security</td>
<td>Building solid relationships and understanding the capacities and attitudes of public security providers towards local communities are essential. The objectives of engagement include:</td>
</tr>
</tbody>
</table>
Host-country government
National governments are responsible for national security and the protection of human rights. They also have a strong interest in, and, in some contexts, responsibility for, protecting the site. Some countries also have Human Rights Commissions or equivalent bodies who should also be consulted. Discussions should include the need for proper investigation of allegations of abuse.

Human Rights Defenders
Local and international are invaluable sources of information on security and human rights issues. In some cases, they can also be important interlocutors with local communities.

Industry peers
Other companies can provide valuable information on their experiences regarding security and human rights issues, as well as help identify and vet private security companies. Speaking with a collective voice can also be important in lobbying local, regional or national authorities.

Home country embassy
Home governments can be important sources of information on public security providers, a potential interlocutor with governments on sensitive issues and effective convenors of multi-stakeholder meetings.

Communicating the site’s commitment to the VPs and national and international standards
Exploring issues of capacity, expertise and application of standards
Building a shared understanding of when and how public providers will intervene
Establishing regular lines of communication and sharing analysis as appropriate (i.e. without putting individuals or groups at risk)
Assessing capacity-building support

NGOs
NGOs
As part of Review and Planning (see Section 2), sites undertake a five-yearly comprehensive external context review. The information collected as part of the external context review, coupled with information from discussions with key stakeholders (see 4E.2 Task 1), helps determine existing and potential future impacts (assessed as part of, see 4E.2 Task 3). Information collected as part of the legal and regulatory, political and governance, and personal and political security categories is typically most relevant for security-related issues.

In addition to the five-yearly update of baseline information, sites are required to collect and maintain up-to-date information about private and public security providers, commensurate to the level of risk and potential impacts in their jurisdiction. Examples of the types of information that will inform the context review are outlined in Table 4E.3.

The frequency, scope and approach to the context review should be determined commensurate to risk and potential impacts. In contexts with a good track record on human rights and security risks, and where the external environment is stable, it may be appropriate to update information on the external context, for example, once every two or three years based on publicly available secondary data. In other contexts, the external context should be reviewed on an annual basis and will require a more detailed review of information from a wider number of sources. All sites should update their external context review if there have been any major changes in the external environment that could affect the security context such as change in government, outbreak of conflict, increase in crime, and major political or policy changes.

In respect of public security providers, the objective of the external context review is to fulfil the VPSHR requirement for public sector VPSHR due diligence to understand the context related to a national/regional security environment. This public sector VPSHR due diligence should be used to inform a review of potential threats to Anglo American and potential impacts to stakeholders related to relying on public sector security providers for security provision and/or rule of law. The extent and detail of this public sector VPSHR due diligence, including the information outlined in Table 4E.3, should be commensurate to the level of risk and potential impacts in the jurisdiction and context.

In respect of private security providers, the objective of the external context review is to fulfil the VPSHR requirement for a private sector VPSHR due diligence to understand the history and track record of the individuals and businesses providing security services. This private sector VPSHR due diligence should be used to inform a review of potential threats to Anglo
American and potential impacts to stakeholders related to utilising this security provider. The private sector VPSHR due diligence should be conducted as/when new private sector security firms are added and/or when the scope of work or work location changes materially. The information outlined in Table D that needs to be gathered should be scaled appropriately.

<table>
<thead>
<tr>
<th>Private security</th>
<th>Public security</th>
</tr>
</thead>
<tbody>
<tr>
<td>History and track record, especially allegations of inappropriate or abusive behaviour and corruption</td>
<td>History and track record, especially allegations of inappropriate or abusive behaviour and corruption</td>
</tr>
<tr>
<td>Type: unarmed/armed, type of weapons used</td>
<td>Type: police/military, unarmed/armed, type of weapons used</td>
</tr>
<tr>
<td>Composition: from local communities or from elsewhere; ethnic/religious/gender balance</td>
<td>Force composition and command and control structures</td>
</tr>
<tr>
<td>Level of training in use of force, human rights/humanitarian law</td>
<td>Location – close to or removed from local communities</td>
</tr>
<tr>
<td>Level of professionalism</td>
<td>Capacity and resourcing</td>
</tr>
<tr>
<td>Hiring process</td>
<td>Wages and conditions of work</td>
</tr>
<tr>
<td>May include review of key individuals within private security firm and their criminal record</td>
<td>Competence, qualifications required and training provided</td>
</tr>
<tr>
<td></td>
<td>Regulations and required standards in relation to use of force, weapons and alignment with VPSHR approach</td>
</tr>
<tr>
<td></td>
<td>Level of professionalism</td>
</tr>
<tr>
<td></td>
<td>Awareness of human rights</td>
</tr>
<tr>
<td></td>
<td>Accountability mechanisms (i.e. independent complaints body etc.)</td>
</tr>
<tr>
<td></td>
<td>Human rights record, including credible allegations of abuses</td>
</tr>
<tr>
<td></td>
<td>History of relations with local communities</td>
</tr>
<tr>
<td></td>
<td>Process for screening of new recruits and hiring process</td>
</tr>
</tbody>
</table>

Home country embassies and government officials
Host country government officials
National and international and civil society, including for example International Alert, Amnesty International and Human Rights Watch. Potential differences in viewpoint should be understood and sites must ensure individuals within civil society/NGOs/Peer companies and VP networks
National and international media reports
Human rights reports by governments and inter-governmental agencies, including the UN, EU, and US
Consultancies and academics specialising in human rights and security issues
Task 3 – Review internal context

Contents in this section:
Task 1 – Conduct stakeholder engagement
Task 2 – Review external context
Task 3 – Review internal context

On an annual basis, in addition to the five-yearly internal context review update (see Section 2), sites are required to evaluate their security arrangements. The site’s security measures (fences, cameras, gates, checkpoints, access restrictions, etc) can negatively impact or inconvenience external stakeholders. High fences and multiple checkpoints can negatively impact the perception local communities have of the site. In principle, the less obtrusive the security arrangements, the more approachable and welcoming the site appears.

Sites should evaluate:

- The level of public and private security provision
- Whether current arrangements are proportionate to the risks and potential social and human rights impacts
- Whether there are alternative arrangements that are less conspicuous (e.g. new technology, planting of natural barriers)
- Whether existing arrangements are disproportionately affecting certain groups, including vulnerable groups
- Any confrontations or complaints relating to security measures and determine whether changes should be made
- The impacts of restrictions on movement or access to determine whether these can be relaxed.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan

- Task 3 – Review internal context
  - Contents in this section:
    - Task 1 – Conduct stakeholder engagement
    - Task 2 – Review external context
    - Task 3 – Review internal context

- The impacts of restrictions on movement or access to determine whether these can be relaxed.
Task 4 – Update SHIRA

The DO phase includes incorporating security-related risks and potential social and human rights impacts into the Baseline WRAC, and includes guidance on controls for security management, including contractual language, training of security staff, working with public security forces, and responding to requests for equipment transfers.

Task 4 – Update

Drawing on the information collected in Task 1, 2, and 3, Security and Social Performance should work together to identify potential security-related impacts and risks, particularly in relation to:

- Threats to site staff
- Protests against the site, and the cause of these protests
- Security response to theft of site property and illegal occupation or use of Anglo American owned or leased land
- Conflict within and between communities, and social disturbances
- Organised crime
- Local community trust in, and perceptions of, the site and public and private security forces
- Presence of public security in local communities
- Accountability of public security forces

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Do
Task 5, Task 6, Task 7, and Task 8 include an overview of controls to prevent, minimize or mitigate security-related impacts and risks. Task 5 and Task 6 are mandatory for sites using or procuring private security services, Task 7 is mandatory for sites using public security, and Task 8 is mandatory for all sites that receive requests for equipment transfers. Even though Task 5, Task 6, Task 7, and Task 8 are mandatory as applicable, the controls included in the Tasks should be implemented commensurate to the level of risk and impact and relevant to the issues identified in the local context.

Abuses in the judicial system, including unfair detention
Intimidation and harassment of local communities
Involvement of site staff in illegal or inappropriate activity
Confrontations with public and private security providers
Checkpoints impeding access to areas important to local communities
Disrespectful behaviour by private security providers arising from cultural differences
Harassment of individuals opposed to the mine, including by other community members who may be in favour of the mine

Security-related incidents and grievances lodged by local community members should be handled according to the guidance provided in Section 3B on Incident and Grievance Management and should be used to inform.

In the event of an allegation of a human rights abuse by public security forces related or linked to a site, the following additional actions should be taken beyond those outlined in 3B:

1. Report the allegation to the Business Unit (BU) CEO and Head of Corporate Affairs (or equivalent), copied to Group Social Performance and Legal.
2. Collect all relevant documents concerning the relationship with the accused party, including internal and external context information (see 4E.2 Task 2 and 3).
3. Collect information about the incident from key stakeholders.
4. Assess the credibility of the allegation. If not credible, then a formal response should be communicated to interested parties and all relevant documentation should be retained. If credible, proceed to step 5.
5. Do not engage directly with the accused party (or his/her superior). Do not seek recourse at the local level and ensure that at all times the identity of the accused party and sources of information are protected.
6. In discussion with the SHIRA BU and Group BU SP, determine how the allegation / incident should be reported to external stakeholders, such as police, the relevant embassy, the national human rights office, or other authorities.
7. Consider the ability of local judicial bodies to handle the allegation in an impartial and practical manner.
8. Monitor any publicly conducted investigation into the alleged abuse.
9. Report developments in the investigation of the allegation to the SHIRA BU and Group BU SP.

Box 3E.3 Incident and Grievance management
Security-related risks and impacts and the approach to managing these risks and impacts should be incorporated in the SMP and in the Security Management Plan as appropriate (see 4E.2 Task 9).
Task 5 – Develop Security Management Plan

Contents in this section:

Task 4 – Update SHIRA
Task 5 – Develop Security Management Plan
Task 6 – Procure private security services
Task 7 – Train private security staff
Task 8 – Work with public security forces
Task 9 – Develop a procedure for equipment transfers

The site Security Management Plan or equivalent should be developed or updated to reflect the relevant controls for security management. Key security-related risks and potential social and human rights impacts should also be included in the sites SMP as relevant.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Do
Task 6 – Procure private security services

Contents in this section:
Task 4 – Update SHIRA
Task 5 – Develop Security Management Plan
Task 6 – Procure private security services
Task 7 – Train private security staff
Task 8 – Work with public security forces
Task 9 – Develop a procedure for equipment transfers

All private security providers should be procured following the Group Contractor Performance Management Standard (see Section 4B). Security contracts are considered socially material.

As part of the procurement process, the following information should be gathered about the private security contractors:

- The information should be analysed, and findings and conclusions should be documented.
- Before mobilisation, the background of all private security staff must be checked as part of a Pre-Employment Screening.

- Contractor’s history of respect for/violations of human rights
- Personal/management and business reputation
- Litigation and criminal offence history
- Training provided by the contractor to its employees on human rights, including the VPs, International Humanitarian Law, the United Nations (UN) Code of Conduct for Law Enforcement Officials and the Basic Principles on the Use of Force and Firearms.
- UN Policies and systems in place to meet VPSHR requirements.
- Business and equipment licenses, particularly as these relate to weapons and firearms
- Procedures on use of force and firearms, policies regarding appropriate conduct and the local use of force, e.g. rules of engagement
- Any formal commitments to human rights/international best practice

4. IMPACT AND RISK PREVENTION AND MANAGEMENT
To ensure that individuals credibly implicated in human rights abuses are not deployed. This should include conducting an official check of police records for any outstanding criminal warrants, and a check of records of the appropriate law enforcement authorities and judiciary.

Contracts with private security providers should include commitments to adhere to the VPs, the International Code of Conduct for Private Security Contractors, and the ISO 18788 Standard (Security Operations Management System). Table 4E.4 details additional contract provisions.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Contract provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct</td>
<td>Conduct towards both employees and members of the surrounding community to:</td>
</tr>
<tr>
<td>Policies and procedures</td>
<td>Policies and procedures that commit security staff to proper standards, including:</td>
</tr>
<tr>
<td>Training</td>
<td>Training done to a high standard including:</td>
</tr>
<tr>
<td>Oversight</td>
<td>Oversight of contract performance including an active review or audit program for, at a minimum, employee background checks and training (materials, qualification of trainers, and training logs).</td>
</tr>
<tr>
<td>written policies on conduct and use of force</td>
<td>observe Anglo American's policies regarding ethical standards, inclusion and diversity, and human rights</td>
</tr>
<tr>
<td>exercise restraint and caution in a manner consistent with international guidelines on the use of force</td>
<td>be the basis for termination of the contract where there is evidence of unlawful or abusive behaviour by security staff</td>
</tr>
<tr>
<td>pre-employment screening for all supervisors, guards, consultants, security specialists and other staff that identifies any history of human rights abuse or other wrongdoing</td>
<td>reporting and investigating allegations of unlawful or abusive behaviour and all use of force incidents, followed by appropriate disciplinary action, as necessary</td>
</tr>
<tr>
<td>sufficient training on weapons, including firearms if issued and any less-than-lethal weapons</td>
<td>training on use of force, to include:</td>
</tr>
<tr>
<td>o force continuum</td>
<td></td>
</tr>
<tr>
<td>o use-of-force technique training and practice</td>
<td></td>
</tr>
<tr>
<td>o human rights training that emphasises avoidance of unlawful or abusive behaviour</td>
<td></td>
</tr>
<tr>
<td>o training in rules of engagement.</td>
<td></td>
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</tbody>
</table>

The decision to deploy armed security guards at site-level should only be taken based on a clear assessment of the need and should be authorised at the level. Where possible, security guards shall apply non-violent means before resorting to the use of force and/or firearms. The use of lethal force is only acceptable in line with local law and to protect human life in the case of an imminent threat. The storage and use of weapons and ammunition must be detailed in the Security team's procedures at the site.
Site private security staff should participate in training prior to and during the contract timeframe to make sure that security staff operate according to the required standards. Sites are responsible for the quality and frequency of training.

Sites may share their training materials with private security contractors and/or review the training materials used by security contractors to train their own staff.

The frequency and content of training varies according to the existing levels of capacity of the private security contractor staff and commensurate to the potential social and human rights impacts related to security. Task 2, Task 4, and Task 5 should enable sites to identify a tailored programme that addresses any identified gaps.

Technical training and training in human rights and the VPs is essential. Training should also prepare security staff to engage with community members appropriately and impartially and might therefore need to include issues such as gender sensitivity and local cultures and traditions.

Security management is about engagement as well as protection. How contractors relate to, and interact with, local communities can be as important as what measures and procedures they employ. Hiring from communities can support better stakeholder relations and can reduce the risk of misunderstandings resulting from cultural differences. Equally, recruiting or using local people to provide security services brings potential challenges. There may be a conflict of interest, or reluctance to act against a fellow community member.

Sites should consider the composition of the security force. Security is an important gender issue. How women and men perceive security can differ significantly. Women are more likely to feel threatened by a strong security presence and are far more vulnerable to harassment and intimidation.

While security can be a male-dominated function, it is critical to ensure that women make-up a significant...
percentage of the guard force security complement. Female guards are essential wherever searches of female staff or contractors are required. Similarly, in contexts of ethnic or religious diversity, sites should make every effort to ensure their security provision is representative of local communities.
Task 8 – Work with public security forces

Contents in this section:
Task 4 – Update SHIRA
Task 5 – Develop Security Management Plan
Task 6 – Procure private security services
Task 7 – Train private security staff
Task 8 – Work with public security forces
Task 9 – Develop a procedure for equipment transfers

When working with public security forces, sites should:

In higher-risk contexts (as informed by the external context review and the public sector VPSHR due diligence), sites (or equivalent agreement) can be an effective way to manage risks related to public security forces.

Even where a written agreement is not possible, the process of working to achieve a mutual understanding of security arrangements and procedures can be just as valuable. Efforts to reach an agreement should be documented.

Typically, an MoU includes:

- Establish a mechanism for regular meetings with public security forces to share information and discuss emerging security concerns.
- Communicate Anglo American's commitments to the VPs and respect for human rights to the public security forces.
- Develop a mutual understanding of the respective roles and responsibilities of public and private providers, including procedures for public security interventions.
- Establish if there are existing training programmes for public security forces in human rights, international humanitarian law and rules of engagement for public security providers, and, where appropriate, identify opportunities to strengthen such efforts.
- Monitor the level and type of public security provision and interactions with the site or local communities.

Scope and purpose of the deployment of public security forces

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Do
Depending on the context and sensitivities involved, sites should consider whether it is appropriate to communicate the fact or substance of the

Voluntary Principles on Security and Human Rights (2019)
Voluntary Principles Initiative Tools.

Available at: https://www.voluntaryprinciples.org/copy-of-resources-3
(Accessed: December 2019)

- Commitment to ongoing engagement between the site and security forces on relevant issues such as security risks and human rights
- Clear procedures for the use of force and the manner in which security forces are armed
- Recruitment and vetting procedures of security personnel to ensure the exclusion of individuals who may have a history of committing (alleged) human rights abuses or criminality
- Commitment to ensure the proper and appropriate level of training for security forces on basic standards of conduct and human rights
- Basis upon which equipment or resources may be provided by the company to security forces (see 4E.2 Task 8).
- The method in which abuses by security forces are reported and investigated
- The process for removal of individuals within security forces from the community if there are allegations of abuse
Requests from public or community security providers for equipment (e.g. fuel, use of vehicles, communications equipment, etc) can be a common occurrence. Where this is the case, sites should develop a procedure for equipment transfers commensurate to the level of risk this presents. This can be developed at a national level and adapted at a site level.

A clear procedure helps to respond to requests and should prohibit the transfer of lethal equipment (e.g. firearms) and establish clear safeguards for all equipment transfers. The procedure should also include the requirement to examine alternatives (for example, providing training or non-lethal equipment instead of lethal equipment) and confirming that the reasons for the equipment are valid.

If equipment transfer does go ahead, safeguards should be put in place. The procedure should outline that the legality of the equipment transfer should be confirmed and the site should only agree to such requests on the condition that the public providers will respect human rights and follow international humanitarian law.

The use of transferred equipment should be monitored. This might be done by using a tracking device, requesting specific monitoring reports from public providers, or even accompanying the public security provider when the equipment is to be used. Another option is to seek third party verification that equipment that has been transferred is being used appropriately. The procedure should outline the requirement for monitoring of transferred equipment.
Task 10 – Monitor and evaluate

The CHECK stage focuses on monitoring and evaluation.

Security-related risks and impacts and the effectiveness of controls should be monitored and evaluated. Table 4E.5 provides a security-related example. More information on Monitoring and Evaluation can be found in Section 1 on Governance.

<table>
<thead>
<tr>
<th>Potential impact</th>
<th>Controls</th>
<th>Target</th>
<th>Control owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disrespectful behaviour towards local community members by private security providers arising from cultural differences</td>
<td>Cultural training for private security staff</td>
<td>0 grievances and incidents related to disrespectful behaviour towards local community members by private security staff due to cultural differences</td>
<td>Positive feedback from community members about private security providers</td>
<td>Social Performance</td>
<td>Start date, end date</td>
<td>Spend on consultant to deliver training.</td>
<td>Training attendance logs show attendance of all private security staff</td>
<td>( X ) number of security staff aware of cultural sensitivities</td>
<td>( \text{Verification: No incidents or grievances related to disrespectful behaviour of private security providers.} )</td>
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</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

CHECK

Through discussion with security staff/direct observation

Number of incidents/grievances relating to disrespectful behaviour of private security providers before and after control implementation

Perception survey (before and after)
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</table>

Example: Excessive force used by public security providers against protesters during protests against the site.

Formally agree guidelines on intervention and use of force with public security forces.

0 incidents or grievances related to excessive use of force used by public security providers against protesters during protests against the site.

Verification: Appropriate interventions occur when public security forces are involved.

Support training of public security forces on VPs.

Number of incidents and grievances on this matter before and after implementation of control.

Direct observations in the event of protests involving public security.

Check through engagement and discussion with public security personnel.

Training attendance logs show attendance of all public security staff involved with providing site-related security.

Training materials specifically address the issue.

X number of public security aware of VPs requirements.

Verifications: X% increase in public awareness of VPs requirements.

Check through engagement and discussion with public security personnel.

Number of incidents and grievances on this matter before and after implementation of control.

Direct observations in the event of protests involving public security.
The final part of the Plan Do Check Act process is to put monitoring and evaluation findings into action.

Where monitoring and evaluation of security-related controls, risks, and impacts show that mitigation is not effective, sites should take corrective action. Security-related incidents or grievances related to security may also prompt corrective action.
Sites should report on the outcomes of monitoring and evaluation, and any corrective actions taken as part of regular internal and external reporting through the [see Section 1](#) and CEF [see Section 3A](#) or equivalent structures as appropriate.
Developing and maintaining a comprehensive security programme that provides appropriate security to people, assets, reputation and communities requires a substantial investment of staff time and resources across multiple departments. Although security is the lead on security management, the guidance outlined here assumes close coordination and collaboration with Social Performance in particular. The Government Relations team also has an important role to play, for example through reporting on VPSHR compliance, engaging governments on policy-level security and VPSHR issues and security issues.

**Lines of accountability**

The table below lays out roles and responsibilities in managing VPS-aligned security arrangements.

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
<th>GROUP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>GROUP Social Performance</td>
<td>Principal</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GROUP Legal</td>
<td></td>
<td></td>
</tr>
<tr>
<td>BUSINESS UNIT</td>
<td>Government Relations</td>
<td>Manager</td>
<td></td>
</tr>
</tbody>
</table>

- Provides advice and input on how to meet the Voluntary Principles on Security and Human Rights and IFC Performance Standard 4.
- Ensures appropriate capacity and expertise is available to site
- Provides advice on national legislation and regulations regarding security and human rights.
- Acts as contact point for local and national government regarding engagement with public security
- Negotiates (or agreement around principles) with public security providers (as agreed with site and depending on context)

**4. IMPACT AND RISK PREVENTION AND MANAGEMENT**

**4E Security Management and the Voluntary Principles on Security and Human Rights (VPSHR)**
Receives regular updates through quarterly reports.

Involves relevant departments in communicating security plans and understanding potential security risks to the site.

Engages with communities as agreed through discussions with Social Performance.

Maintains relationships with public security.

Gathers background information on private and public security with the support of Social Performance and BUs.

Coordinates findings with Social Performance to develop a full picture of impacts and risks.

Coordinates with Social Performance to develop Controls.

Ensures new or revised contracts with private providers are aligned with the Group Contractor Performance Management Standard.

Monitors application of contract provisions.

Provides, or oversees and monitors, appropriate training for private providers.

Monitors composition of guard force.

Works closely with BUs to negotiate or agree equivalent principles.

Works closely with BUs to develop a policy or procedure on equipment transfers.

Monitors use of equipment provided by the site.

Designs overall consultation process with affected communities to understand security-related issues.

Engages site security teams to build relations with affected communities, including communication of VPs and human rights commitments.

Reviews context to inform identification of impacts and risks.

Coordinates with security team to identify impacts and risks and establish risk rating for public security.

Works with security team to develop Controls.

Supports security teams as needed.

Monitors and maintains relationships between private providers and local communities.

Monitors relationship between public providers and affected communities.

Ensures cross-departmental coordination through SPMC.

Facilitates coordination with BU.
This section provides guidance on land access, displacement and resettlement (LADAR). Anglo American recognises the significant impact of displacement on communities and the importance of managing it in a way that promotes positive and sustainable outcomes for both the affected communities and the business. This section is aligned with the International Finance Corporation (IFC) Performance Standards (PS), particularly PS 5. Under the Anglo American Social Way ('The Social Way'), every Anglo American site is required to identify, assess and manage impacts in a timely, consistent and transparent manner. This requirement applies across all stages of the asset lifecycle.

Specifically, this section:

- Within Anglo American, all resettlement projects are treated as capital investment projects and follow the governance requirements as set out in the Investment Committee (InvestCo) Terms of reference (ToR). In the context of this Toolkit section, the term "resettlement project" refers to distinct projects involving the management of temporary or permanent physical or economic displacement. Task 1 (see 4F.2 Guidance) sets out how these resettlement projects are identified.
- This step-by-step guide to manage land access, displacement impacts, and resettlement projects is aligned with the Investment Development Model's (IDM) Investment Criteria by Stage (ICbS) requirements.

### Contents in this section:

- **4F Land Access, Displacement and Resettlement**
- **4F.1 About land access, displacement and resettlement**
  - This section provides guidance on land access, displacement and resettlement (LADAR).
  - Anglo American recognises the significant impact of displacement on communities and the importance of managing it in a way that promotes positive and sustainable outcomes for both the affected communities and the business. This section is aligned with the International Finance Corporation (IFC) Performance Standards (PS), particularly PS 5. Under the Anglo American Social Way ('The Social Way'), every Anglo American site is required to identify, assess and manage impacts in a timely, consistent and transparent manner. This requirement applies across all stages of the asset lifecycle.
  - Specifically, this section:
    - Within Anglo American, all resettlement projects are treated as capital investment projects and follow the governance requirements as set out in the Investment Committee (InvestCo) Terms of reference (ToR). In the context of this Toolkit section, the term "resettlement project" refers to distinct projects involving the management of temporary or permanent physical or economic displacement. Task 1 (see 4F.2 Guidance) sets out how these resettlement projects are identified.
    - This step-by-step guide to manage land access, displacement impacts, and resettlement projects is aligned with the Investment Development Model's (IDM) Investment Criteria by Stage (ICbS) requirements.

### Key terms

- **LADAR**
  - Explores the topic of land access, displacement and resettlement and highlights key terms relating to it to ensure a common understanding.
  - Provides guidance on site-level management of land access, displacement impacts, and resettlement projects through the development of a strategy and framework.
  - Outlines the preparatory scoping and framing work required before commencing with participatory resettlement planning.
  - Provides guidance on the development, operationalisation and implementation of Displacement Management Plans (DMPs) (Resettlement Action Plan (RAP), Livelihood Restoration Plan (LRP), Land Access Procedure (LAP) and Remedial Plans).
  - Explains the monitoring and evaluation (M&E) requirements, as well as compliance reviews and close-out audits.
  - Indicates the roles and responsibilities of various internal stakeholders to ensure the cross-functional collaboration required for management.

### Impact and Risk Prevention and Management

- **4F.1 Introduction**
The intended users of this section are primarily the operations Social Performance (SP) teams and the project teams responsible for planning and implementing displacement and resettlement. However, managing land access and displacement requires a cross-functional approach; various activities may necessitate land access and displacement impacts may stem from a variety of sources. As such, multiple functions have a role to play in avoiding and minimising displacement impacts or implementing a... Other key functions, in addition to, include Mine/Asset Planning, Strategic Planning, Technical, Projects, Environment, Health and Safety, Legal (including teams responsible for land transactions and acquisitions), Project Management and Security.

Relevance to other sections
Planning for and managing... involves several of the guidance sections in The Social Way. RAP

Governance (Section 1): Social Performance Management Committee (SPMC) – multiple departments have a role to play in minimising and managing... The provides the forum to ensure that all relevant functions at site-level are engaged. LADAR SPMC

Review and Planning (Section 2)
As part of Social Performance planning, sites are required to review and update their baseline data and context review. This information is central to anticipating and understanding land access and displacement impacts. Additionally, systemic and site-related vulnerability must be considered as part of planning and implementation.

Engagement and assessment (Section 3)
A. Stakeholder Engagement (3A) – guidance provided on stakeholder engagement must be adopted when designing and conducting resettlement-specific engagement. Resettlement-specific engagement must be aligned with the site's Stakeholder Engagement Plan (SEP).
B. Incident and Grievance Management (3B) – similarly, the resettlement-specific grievance mechanism must be aligned with and utilise the tools of the incident and grievance management process.
C. Social and Human Rights Risk Analysis (SHIRA) (3C) – potential displacement-related impacts must be included and assessed in... SHIRA

Impact and risk prevention and management (Section 4)
A. Socio-Economic Development (SED) Plan (4A) – livelihood restoration programmes should be informed by and aligned with... Plans and, conversely,... plans should be cognisant of livelihood restoration requirements resulting from resettlements. Poor livelihood restoration outcomes undermine Anglo American's Purpose, can have a direct influence on our ability to meet the Sustainable Mining Plan commitments, and negatively impacts our ability to undertake wider community engagement.
C. Community Health and Safety (CHS) Management (4C) – displacement and resettlement can have impacts on affected stakeholders' health and mental well-being and can make them more vulnerable to other... impacts. Impacts may also be a resettlement trigger. CHS CHS
Refers to monetary payment and/or provision of replacement or alternative assets in exchange for the taking of land, including fixed assets thereon, in part or whole.

- Cultural heritage impacts resulting from or associated with physical or economic displacement.

- The cut-off date provides a basis for determining eligibility for inclusion in the resettlement process. It may be defined by national legislation, and typically coincides with either the start or completion of the census and asset inventory of persons affected by the project. Persons who start occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees and woodlots) established after the cut-off date need not be compensated.

- Loss of assets (including land), or loss of access to assets, that leads to loss of income or means of livelihood as a result of project-related land acquisition or expropriation is deemed to be in the public interest, and often necessary for social and economic development.

- The displacement and resettlement of Indigenous Peoples require additional consideration; most notably, free, prior and informed consent (FPIC).

- The overarching principles for land access, compensation and resettlement/livelihood restoration planning that will apply to all resettlement processes, and is the precursor to the detailed framework.

- A document setting out the principles and procedures to be adopted for resettlement. It promotes consistent good resettlement practices over time by defining a Resettlement Action Plan (RAP). Encompasses physical and economic displacement (see definitions for 'physical displacement' and/or 'economic displacement').

- A survey undertaken to identify (a) persons eligible for compensation, and (b) identify and assess/value all assets (by owner and/or rights holder) that will need to be replaced/compensated under the Resettlement Action Plan (RAP). The survey is known as the Asset Survey (ASM). For purposes of resettlement, the survey/asset inventory is presented in the Conflict Management section.

- The audit is undertaken by an independent assessor or assurance body and should commence during displacement management planning. Measures, especially livelihood restoration, are required to complete the displacement management process. The audit is undertaken by an independent assessor or assurance body and should commence during displacement management planning. Measures, especially livelihood restoration, are required to complete the displacement management process.

- The review is undertaken by an independent assessor or assurance body and should commence during displacement management planning.

- Regular assessment against predetermined indicators on whether displacement management complies with company requirements. The review is undertaken by an independent assessor or assurance body and should commence during displacement management planning.

- The sanction is required to restructure land and/or avoid or minimise displacement impacts. G. Site-Induced Migration (SIM) (4G) is required to relocate the graves (see Section 4H.2 Guidance, Task 5 for individual project components). Additionally, the Graves Protection and Repatriation Act (GPR) is required to relocate the graves (see Section 4H.2 Guidance, Task 5). Potential human rights impacts related to security require specific consideration; most notably, free, prior and informed consent (FPIC).

- It is a legal commitment or promise to give something of value for the taking of land, including fixed assets thereon, in part or whole, whether planning objectives have been met and if any corrective actions or extension of existing mitigation are required.
The compensation offered to persons, households, groups and/or communities physically and/or economically displaced by the project. This includes (but is not limited to): replacement cost/value of lost assets; economic loss; relocation assistance, and other short-term assistance required to move from one site to another.

**Resettlement**

An umbrella term denoting the spectrum of actions to mitigate the adverse impacts of physical and/or economic displacement.

**Involuntary resettlement**

An eviction process, usually government-led, that is developed in consultation with relevant authorities to deal with cases where it has not been possible to reach a negotiated settlement.

Analogous to a government allowance without providing access to legal or other forms of protection. To be distinguished from legal eviction.

**Replacement land**

Includes the outright purchase of property and purchase of access rights, such as rights of way.

**Livelihood**

A livelihood comprises the capabilities, assets and activities required for a person to make a living, such as: wages from employment; cash income earned through agricultural or other productive activities; income from self-generated goods or produce used for exchange or barter; income from renting land or premises; income from a harvest or animal husbandry; share of agricultural enterprises; government allowances (child allowances, special assistance for the very poor); and remittances from family or relatives.

**Replacement cost as a rate of compensation for lost assets**

Must be calculated as market value plus transaction costs. (terms)

**Physical displacement**

Loss of house/apartment, dwelling or shelter as a result of project-related land acquisition which requires the affected person(s) to move to another location.

**Involuntary displacement**

Forced eviction without providing access to legal or other forms of protection.

**Involuntary resettlement**

Involuntary displacement of persons, households, groups and/or communities from land by a public authority or other person or entity without providing access to legal or other forms of protection. To be distinguished from voluntary eviction.

**Replacement cost/value**

Involuntary displacement can occur when affected individuals or communities do not have the right to refuse land acquisition that will result in displacement.

**Project-led resettlement**

In contrast to government-led resettlement, project-led resettlement refers to land access and displacement funding and management by the company.

**Negotiated**

Forced eviction without providing access to legal or other forms of protection. To be distinguished from voluntary eviction.

**Displacement**

This may include relocation of persons, households, groups and/or communities caused by a project affecting their land.

**Displacement (terms)**

Involuntary displacement can occur when affected individuals or communities do not have the right to refuse land acquisition that will result in displacement.

**Displacement impacts**

Similar to a definition of adverse impacts, displacement impacts may be physical (e.g. loss of house/apartment or shelter) or economic (e.g. loss of operating or productive assets).

**Livelihood restoration**

A programme intended to set out how to replace or restore livelihoods lost or reduced as a result of a project. The livelihood restoration section of a resettlement plan is often part of the project’s expected benefits and outcomes.

**Restoration programmes**

Programmes designed to replace or restore livelihoods that have been lost or reduced as a result of a project. Involuntary displacement would generally involve providing replacement land and/or housing, service provision, transport and resettlement assistance.

**Resettlement plan**

A plan that provides a comprehensive set of actions for addressing impacts related to physical and economic displacement. It describes the procedures and actions to be taken to compensate for losses, mitigate adverse project impacts, and provide development benefits to those who will be resettled or displaced.

**Remedial planning**

Similar to a resettlement plan; however, remedial planning is undertaken where past land access and displacement management are not compliant with company and/or good practice guidelines.

**Competent resettlement staff**

Qualified/competent resettlement staff must have appropriate background, credentials, professional registration and/or qualification. Where relevant, expertise should be supported by formal training and/or professional development.

**Qualified resettlement staff**

Individual who has considerable, demonstrable and recent expertise in the specific field in comparable contexts. Where relevant, expertise should be supported by formal training and/or professional development.

**Land Access**

A procedure required in cases where short-term and/or intermittent requisite land access will result in temporary restrictions on land access; damage to or loss of crops, trees or structures of economic value; temporary disturbance in livelihood activities; or temporary physical displacement as a result of short-term risks to health and safety.

**Dwelling unit**

A person or group of persons who share a dwelling unit. A dwelling unit is a house, apartment, mobile home, cluster of rooms, or a single room in which the members of the household live together.
Resettlement assistance
Support provided to people who are physically displaced by a project. Assistance may include transportation, food, shelter, and social services that are provided to affected people during their relocation. Assistance may also include cash allowances that compensate affected people for the inconvenience associated with resettlement.

Resettlement trigger
The activity or circumstance that causes displacement and requires resettlement. This may be land access for operational purposes, or environmental, health or safety impacts on a specific community.

Schedule of rates
A gazetted set of monetary compensation rates to be used in the valuation and calculation of compensation for various categories of land, structural assets, crops and trees, and other assets which might be purchased by authorities during land acquisition.

Vulnerable persons
People who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status, may be more adversely affected by project-induced displacement than others and who may be limited in their ability to re-establish themselves or take advantage of resettlement assistance and related development benefits. They may include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities, communities dependent on natural resources or other displaced persons who may not be protected through national land compensation or land titling legislation. In a project-specific context, vulnerability is a relative concept in that it is intended to identify persons, households or groups requiring additional support/assistance over and above that applicable to the displaced community as a whole.

Lifecycle planning
Across the lifecycle of the asset, consideration needs to be given to how potential displacement impacts and risks can be prevented, mitigated, managed, and monitored.

During the Discovery phase, initial engagement with communities on, and the site's management of, land access and temporary and/or permanent displacement set the tone and precedent for the remainder of the lifecycle. It is critical that temporary land access is managed through an appropriate and that no premature commitments are made regarding entitlements, compensation or future potential permanent displacement. It is equally important to avoid securing rapid co-operation from communities by agreeing to unrealistically high compensation rates for damages or disturbance, as this would create the expectation that all future projects and/or operations will apply similar rates.

In Project Development, when strategic planning decisions are being made in terms of requisite land access, project teams should aim to avoid and minimise land access needs and resultant displacement impacts. This is best achieved through considering alternative project designs.

During the Operations phase, the operations teams must assess possible displacement impacts on an ongoing basis, particularly related to impacts resulting from mining activities.

While resettlement may be planned and physical relocation might happen during operations, livelihood restoration activities and monitoring and evaluation may extend into the closure and post-closure phases. If this is the case:

- Social transition success criteria should include the close-out of any ongoing resettlement process.
- The Mine Closure Plan should include resource and budget to close out resettlement (including ongoing monitoring and evaluation, compliance reviews and close-out audits).
- Closure and post-closure teams, if different to operational teams, should have capacity to manage.
- If possible, there should be continuity in the teams managing the process between the different lifecycle stages.

Other aspects to consider in relation to social transition and include:

- Closure and social transition should be considered during planning e.g. do strategies for livelihood restoration align with post-mining land use options and wider social transition success criteria aimed at reducing dependency on the mine? Has this been discussed with stakeholders as part of consultations on both resettlement and social transition?
Ensure any potential displacement impacts associated with mine closure and options for post-mining land use are understood and factored into closure planning.

Long term monitoring should also identify any potential triggers for resettlement during the closure and post-closure phases e.g. linked to community health and safety.

During land access negotiations, options around restoring landowners/land users' access to the land post-mining should be transparently discussed and agreed in advance, where feasible, e.g. land buy-back schemes, conditions for rehabilitating or improving leased land prior to restoring it to the original owners/users. To manage expectations and avoid potential conflict, the site should be clear on the reasons it may not relinquish land post-closure, especially where it is considered of value to local stakeholders (e.g. for artisanal and small-scale mining or agricultural use). Any restrictions on land-use options for land that is relinquished should be made clear.
Resettlement is defined as the comprehensive process of planning for and implementing the relocation of people, households and communities, including (a) monetary compensation or compensation in kind for lost assets, resources and inconvenience, and (b) the provision of support for livelihood restoration and enhancement, re-establishment of social networks, and restoring or improving the social functioning of the community.

In practice, resettlement also includes activities aimed at mitigating the adverse effects associated with economic displacement.

Displacement emanates from a variety of site requirements and activities, including land access and land-take, as well as impacts. The latter may relate to the location of communities in proximity to mine infrastructure such as tailings storage facilities (TSFs) and waste rock dumps (WRDs). Relocation, defined as changing the location of residential dwellings, businesses and/or livelihoods, cultural or other activities from one place to another, is required when communities are displaced from (or somehow restricted in their use of) land utilised for these purposes.

Resettlement is either voluntary or involuntary. In the case of voluntary resettlement, affected individuals, land users and/or communities have a choice to relocate. Involuntary resettlement occurs when affected parties do not have the right to refuse relocation and the legal right to expropriate land exists. As a safeguard, Anglo American considers all resettlements as involuntary and manages the process accordingly, even if negotiated agreement is reached with the affected individuals. As such, resettlement must be planned and implemented in accordance with good practice standards such as the CHS.

Decades of research have shown that resettlement associated with public and private sector projects, including mining, frequently results in the impoverishment of local land users. The most significant impacts associated with displacement are landlessness, joblessness, homelessness, marginalisation, food insecurity, increased morbidity and mortality, loss of access to common property and services, and social disarticulation.

The disruption of education is another notable impact.

Resettlement has a significant impact on affected communities, is often controversial, and also represents a high risk to the company. The way in which Anglo American engages stakeholders on the topic, relocates displaced communities and restores livelihoods is central to our Purpose to reimagine mining to improve people's lives.

It typically takes many years to plan and implement resettlement, and reach the point where unencumbered land access is achieved; accordingly, displacement impacts must be identified well ahead of the time, ideally 10 years or more in advance of the required land.
The resettlement process requires extensive and on-going topic-specific stakeholder engagement and negotiation, and detailed planning led by a team with significant resettlement expertise. Internally, dedicated resources and governance structures are required, and often also substantial funding.

Key objectives and guiding principles

Box 4F.2 lists the key objectives of good practice resettlement. Operations and project teams must adopt these as guiding principles during the planning and implementation of resettlement projects.

- To avoid, and when avoidance is not possible, minimise displacement by exploring alternative project designs.
- To avoid forced eviction.
- To anticipate and avoid, or where avoidance is not possible, minimise adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost, and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- To improve, or restore, the livelihoods and standards of living of displaced persons.
- To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.

Types of displacement

In addition to voluntary and involuntary, it is important to distinguish between two types of displacement:

- Physical displacement is the loss of houses, dwellings or shelter and entails the relocation of households to an alternative location given the need to access the land or potential sustained impacts on the community.
- Economic displacement is the loss of assets (including land), or the loss of access to assets that results in the loss of income or means of livelihood. While physical and economic displacement usually go hand in hand, in some cases households can be economically displaced without being physically displaced.

Permanent displacement occurs when displaced households are not able to return to or make use of the land from which they are displaced within a reasonable period such that there is no material impact on their socio-economic well-being and as appropriate to the context.

Temporary displacement occurs when a household’s access to their home or means of livelihood is disrupted for a short period of time, typically not longer than a year but it could be as short as few days. Additionally, there are no sustained impacts resulting from the temporary displacement that would alter post-displacement conditions. To manage expectations of local communities and be precise in describing the impact, temporary displacement should be referred to as disturbance.
These tenure circumstances include the following:

Eligibility for compensation or resettlement assistance should take the type of tenure arrangement into consideration. For instance, those who do not have a recognisable legal right or claim to the land and/or assets they use and/or occupy may not be eligible for compensation for the land they use/occupy, but (depending on context) may be eligible for livelihood restoration and compensation for fixed assets established on the land. This excludes opportunistic settlers and speculators who encroach on to the land after the cut-off date.

Claims recognisable under national law should be verified through a legal process, as dictated by the local context. Table 4F.7 (see 4F.4 Tools and guidance notes) provides a list of scenarios that may result in displacement, categorised according to the tenure arrangements listed above.

Different requirements are required depending on the type of displacement:

In the case of commercial land transactions, an impact assessment or due diligence must be conducted to determine whether the transaction may result in displacement impacts. The voluntary sale of a property by the landowner could result in the involuntary displacement of the landowner's employees and/or other land users. If it does, the appropriate resettlement triggers are required.

There are several possible triggers for permanent displacement. The most common ones are:

- Those who have formal legal rights to the land and/or assets they use and/or occupy;
- Those who do not have formal legal rights but who have a claim recognisable under national law over the land and/or assets they use and/or occupy; and
- Those who do not have a recognisable legal right or claim to the land and/or assets they use and/or occupy. This includes informal or opportunistic settlers who reside in the resettlement-affected area prior to the cut-off date and customary land users.

Permanent physical displacement requires a DMP, inclusive of a plan to address livelihood restoration of the displaced households. Remedial (Corrective) Plan is required.

Permanent economic displacement requires a RAP, which is comparable to a LRP but applicable in cases where there is no physical displacement.

Temporary physical and economic displacement requires a Land Access Procedure (LAP). Where a close-out audit of a DMP or RAP finds that the process deviated significantly from good practice standards, a Remedial (Corrective) Plan is required.

When households are living on or using land required for mining/processing purposes or within buffer zones:

- When households could be expected to experience significant or sustained health and safety impacts, or cumulative effects from the impacts, attributable to the activities of, infrastructure for and presence of the site.
Even if a site does not cause physical displacement, it may inadvertently cause economic displacement. The displacement may be along the outskirts of the site’s Area of Influence and may only materialise in the future. Understanding the external context is therefore key to identifying displacement impacts. Similarly, displacement impacts must be considered even if the site or business unit (BU) has legal rights over the land it needs to access.

Disturbance (temporary displacement) is triggered by short-term land access needs at any stage of the lifecycle. During Discovery, for example, drilling activities may result in disturbance of agricultural land. During Construction, it may result from temporary laydown areas and, in Operation, periodic maintenance or temporary rerouting of access roads may cause disturbance. If the activity requiring short-term land access results in significant impacts adversely affecting the post-disturbance environment (for example, grazing land that cannot be fully rehabilitated once construction is completed), the displacement must be treated as permanent.

Resettlement timing

The identification of displacement impacts and their management by means of a resettlement plan are long-lead items. The physical land area that will be affected is ideally vacated before it is required for mining purposes or before the impact causing displacement begins to occur. To enable this, the following timelines are recommended:

- Detailed resettlement planning (4F.2 Guidance, Task 7) must start four to seven years before land access is required;
- Resettlement implementation must commence one to three years before land access is required (4F.2 Guidance, Task 9).

These timelines are recommended minimums; however, it is acknowledged that adherence to the timelines may not always be feasible or necessary. Small uncomplicated resettlements may require less time, and for larger resettlements, strategies such as phased land access can be employed to reduce timelines. Operations and project teams must seek guidance from Group in instances where the recommended timelines cannot be adhered to.

Managing accessed land

Securing and maintaining land access after obtaining the legal right and social licence to do so is both critical and challenging; it requires a predetermined strategy, ongoing cross-functional collaboration and is time and resource-intensive. Failing to prevent unauthorised land use in an area that has been accessed for a specific business purpose is a significant risk and may result in impacts, including additional displacement. The most common threats to maintaining land access are listed in Table 4F.1, alongside potential prevention and mitigation measures for each.

<table>
<thead>
<tr>
<th>Threat</th>
<th>Potential management strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Illegal settlement and/or economic activities, including ASM</td>
<td>Proactively secure land and control or restrict land use on an ongoing basis. The use of physical barriers and signage should be considered.</td>
</tr>
<tr>
<td>Speculative settlement and/or economic activities, motived by hopes of inclusion in the resettlement process or other forms of compensation</td>
<td>Monitor the accessed land against the census and asset inventory compiled during resettlement planning to detect, report and deal with illegal uses as soon as possible. Consider the use of satellite imagery, drone aerial imagery and the establishment of a joint task force with representatives from local communities and authorities. Liaise with appropriate local authorities responsible for dealing with illegal land use.</td>
</tr>
</tbody>
</table>

Displacement impacts must be scoped five to eight years before land access is required (4F.2 Guidance, Task 4); Detailed resettlement planning (4F.2 Guidance, Task 7) must start four to seven years before land access is required; and Resettlement implementation must commence one to three years before land access is required (4F.2 Guidance, Task 9).
Threat Potential management strategy

Expansion of surrounding communities as a result of Delay between obtaining land access and site's use of the accessed land

Resettlements as capital projects

All resettlement projects within Anglo American are treated as capital investment projects and follow the governance as set out in the. Specifically:

Formal mechanisms to identify potential future resettlement projects and initiate resettlement investigations are as follows:

Once identified, resettlement projects are categorised according to the phases listed below, and progress through these phases by means of stage-gate reviews:

Reiterate restrictions on land use in the accessed area and implications for transgression of these restrictions through instating a post-relocation moratorium or memorandum of understanding (MOU) with relevant stakeholders, such as local leaders or the Community Engagement Forum (CEF). MOU must be managed according to Section 4K.

Ensure that a management plan (see Section 4G) considers accessed land and includes measures to control access and prevent illegal land uses.

In collaboration with teams, identify suitable interim land uses that are mutually beneficial to the site and local communities, and that can be managed and discontinued without significant additional displacement prior to land access.

To monitor a pipeline of potential future resettlement, Resettlement projects must adhere to the; InvestCo resettlement projects must adhere to the; IDM/Group Director of Corporate Relations (CR) must approve the scope of review by Group Investment Assurance (GIA) or other delegated assurance body, and ensure that the appropriate assurance has been undertaken by an assessor with the suitable expertise; and InvestCo stage-gate approval of the resettlement process by or the Group Director of CR through the investment assurance process from a mining capital project; or through a proposal from Group or -level to for consideration, based on the site's land access and displacement strategy (see Section 4F.2 Guidance, Task 1).

Pre-concept: the resettlement may be required in the long-term (more than 10 years in the future) and is included in the site's land access and displacement strategy. The purpose is to document the potential future resettlement to ensure that relevant parameters (such as land use on and influx into to-be-accessed land) are monitored over time. If the displacement impact can be avoided, pre-concept resettlements will not progress into Phase 1; progression into Phase 1 is triggered by the nature and timing of mining activity and associated impacts and by means of the formal mechanisms mentioned above.

Phase 1 – Scoping and framing: the initial scope of and indicative approach to a potential resettlement is defined to inform the decision about whether the resettlement is indeed required and desirable from a business perspective. No engagement with the potentially displaced households is required for completion of this phase. This phase typically aligns with the Concept and Pre-Feasibility Study (PFS) A stage.
Stage-gate reviews are carried out in accordance with the and Investment Assurance Guidelines and are supported by this Toolkit. As per the requirements, a Post-Investment Review (PIR) is completed after the commencement of implementation of a resettlement project (see 4F.2 Guidance, Task 9).

Phase 2 – Resettlement planning: if there is a high degree of confidence that a resettlement project is required, robust planning is undertaken during this phase. Potentially displaced households are engaged in a participatory planning process which includes negotiations about compensation, replacement land and/or housing, livelihood restoration and other aspects of the resettlement process. Failure to complete the resettlement after commencement of this phase may have significant negative consequences for both the community and the business. This phase typically aligns with the PFS-B stage.

Phase 3 – Resettlement implementation readiness: resettlement planning documentation is operationalised during this phase, in preparation for implementation during the execution phase. This phase typically aligns with the Feasibility Study stage (FS).


The following provides a guide to managing land access, displacement impacts and resettlement projects following the Plan Do Check Act (PDCA) cycle (see Figure 4F.1).

![Diagram of PDCA cycle with tasks](image)

**1. Develop land access and displacement strategy**
**2. Update SHIRA**
**3. Develop displacement framework**

**4. Conduct scoping**
**5. Establish resource plan and management framework**
**6. Develop resettlement stakeholder engagement plan**
**7. Develop management plan**
**8. Operationalise management plan**
**9. Implement management plan**

**10. Monitor and evaluate**
**11. Compliance reviews and close-out audits**
**12. Adjust**
**13. Report**

**FIGURE 4F.1 THE PDCA CYCLE AS RELEVANT TO LADAR**
Tasks 1 to 3 are undertaken at site-level and are the responsibility of the operations team (with inputs from and coordination with other Functions, and support from Group, and/or external resettlement consultants as required). Task 1 involves the identification of potential future resettlement projects; some sites may require only one resettlement project, but there will be instances where a site will have two or more resettlement projects that need to take place in different areas and at different times in the site’s lifecycle.

Tasks 4 and onwards are undertaken separately for each individual resettlement project; it is possible that the same site may be simultaneously engaged in different tasks for separate resettlement projects. Task 4 (detailed scoping of the resettlement project) up to Task 9 (implementation of... Tasks 10 to 13) reverts to the operations team.
Task 1 - Develop land access and displacement strategy

The PLAN phase focuses on achieving a holistic understanding of the site's requisite land access, its timing, the magnitude and type of displacement impacts, and associated necessary to address the impacts. The PLAN tasks prepare sites to achieve long-term good practice outcomes and enables timely action to secure land, thereby minimising land access-related risks and impacts. The tasks do not require engagement with external stakeholders about the potential displacement and subsequent resettlement. In fact, it is discouraged at this stage to avoid generating fears or expectations amongst the communities who may be affected.

Task 1 – Develop land access and displacement strategy

The purpose of Task 1 is to identify the site's planned land access needs and associated displacement impacts over time, and gain a consolidated view of past, current and potential future resettlement projects as relevant to the site. It aims to:

- Identify potential future resettlement projects based on requisite land access and potential risks and impacts associated with the site (indirect displacement);
- Determine the nature and estimate the magnitude of displacement impacts associated with potential future resettlement projects;
- Highlight risks associated with land access needs and potential future resettlement projects;
- Outline a schedule for when land access is required, or when the impact necessitating resettlement will begin to occur; and
- Provide high-level timing for the initiation of detailed studies as per the resettlement phases.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan

Task 1 - Develop land access and displacement strategy

Contents in this section:

- Task 1 - Develop land access and displacement strategy
- Task 2 – Update SHIRA
- Task 3 - Develop displacement framework
Performance Review and Planning (see Section 2A) and (see Section 3C). It may be necessary to collect additional information from primary and secondary sources. Using an appropriate GIS platform, the following data must be spatially presented for the site’s Area of Influence (see Section 2A Guidance, Task 3):

Based on this information, particularly the site-level data relating to the,

and buffer zones, potential future resettlement projects must be identified, roughly delineated on the GIS platform and categorised according to its

phase. When identifying potential future resettlement projects, the following should also be considered:

**Site-level data:**
- site layout, including infrastructure, mining areas and access roads;
- current and anticipated future exploration and expansion areas as per the Life of Asset Plan (LoAP) and Resource Development Plan (RDP);
- buffer zones for mitigating potential impacts (informed by the Social Management Plan (SMP)) and for relevant infrastructure such as;
- TSFs (TSFs)
- WRDs (WRDs)
- original location of communities that were resettled previously;
- areas where replacement housing and land was provided as part of previous resettlement projects (relocation sites);
- communities currently engaged in a resettlement process and their relocation site(s) when it is agreed; and
- areas benefitting from social or economic development projects implemented by the site or another party.

**Community-level data:**
- local communities and areas used for seasonal or permanent residential purposes;
- land known or suspected to be used by the local communities for any purpose, including residential, business, livelihoods and cultural or religious practices;
- cultural heritage resources, including graves and cemeteries (see Section 4H.2 Guidance);
- administrative and judicial boundaries, both formal and traditional;
- available data indicating likely future expansion of settlements and/or population influx (such as applications for township establishment, planned roads, etc.);
- access routes and service infrastructure such as schools and healthcare facilities.

**Cadastral information for each land parcel on which site or community-level data is shown:**
- ownership, size, extent, third party valuation and existing permits or licenses (held either by Anglo American or another party);
- land claims or other legal disputes; and
- legal/formal land use and land user information.

The impact of one or more resettlement projects on communities in proximity to but not directly displaced by...
The following information must then be determined for each resettlement project:

Potential future resettlements must be presented in a schedule indicating both when land access may be required or when the impact necessitating displacement may begin to occur, and when the project should progress from pre-concept into Phase 1 of the process (ideally five to eight years in advance) if displacement impacts cannot be avoided.

The strategy document and GIS data are for internal planning purposes only, and must be reviewed and updated at least on an annual basis, or as new information regarding land access needs becomes available. Table 4F.4 (see 4F.4 Tools and guidance notes) provides a template for the land access and displacement strategy.

It should be noted that the land access and displacement strategy will contain only high-level estimates of displacement impacts and geographical areas associated with each resettlement project. Refined estimates suitable for detailed planning are developed during resettlement scoping (see 4F.2 Guidance, Task 4) and are undertaken on a project-by-project basis rather than for the site as a whole.

Nature of the displacement impact, that is temporary or permanent, and physical or economic or both, and the associated required (DMP, LAP, RAP, LRP);

Whether the resettlement project would trigger a grave relocation and require a GRP, and whether other cultural heritage resources may be displaced, requiring specific management measures;

Estimated magnitude of the displacement impact (hectares of land, number of land users or owners, number of households, number of graves or other cultural heritage resources, etc.);

Design alternatives considered as part of the RDP, LoAP, or mine planning to avoid displacement or minimise its magnitude; and

Risks to the successful planning and implementation of the resettlement project. Possible examples of such risks include existing land claims, known or suspected community opposition to resettlement, and political instability or interference.
Task 2 – Update SHIRA

Contents in this section:

Task 1 - Develop land access and displacement strategy
Task 2 – Update SHIRA
Task 3 - Develop displacement framework

Impacts and risks identified in the land access and displacement strategy (see 4F.2 Guidance, Task 1) should be assessed and summarised in [15x1142], recorded in the site’s baseline workplace risk assessment and control (WRAC) and the [15x778](see Section 3C.2 Guidance). Impact management controls should be identified in accordance with the mitigation hierarchy and good practice:

Avoidance and minimisation of displacement impacts is cross-functional; the [15x488](see Section 1) is one key vehicle for ensuring co-ordination. Integration of land access and displacement management into the process is critical (see Section 2). Proposed site changes and developments contained in the [15x398] should be assessed for their potential displacement impacts to allow for design changes, where necessary, or ensure advanced planning for the effective management of displacement impacts.

Displacement impacts may be linked to other areas of Social Performance, including [15x278](see Section 4A), [15x278](see Section 4C), [150x278](see Section 4G), and [373x278](see Section 4K). Operations teams must ensure that there is good understanding of the linkages and that the potential displacement impacts and risks captured in [854x248] are consolidated to avoid duplication or having different ratings or controls for the same risk or impact.

Displacement impacts included in [348x158] must be updated once the scope of a specific resettlement project is refined (see 4F.2 Guidance, Task 4) and again once the scope is finalised (see 4F.2 Guidance, Task 7).
Depending on context, the displacement schedule may indicate that potential future resettlement projects may be required at different times and locations over the site's lifecycle. To promote consistent good resettlement practices, and thereby reduce business risk, all elements of resettlement planning and implementation, particularly entitlements and compensation principles must be applied consistently across the site over time. This is achieved through the development of a displacement framework which, amongst other things, sets out guidelines for entitlements and compensation.

Every site where displacement is likely to occur is required to develop a displacement framework, even if the land access and displacement strategy (see 4F.2 Guidance, Task 1) identifies only one likely resettlement project, as this is required in preparation for the development of the appropriate DMP or RAP. If not already in place, the displacement framework should be developed as part of the Phase 1 – Scoping and framing study for the potential resettlement.

The displacement framework must be developed by a resettlement expert; if an external expert is engaged, operations teams must play an active and guiding role during the process, provide information as required by the consultant and facilitate internal approvals of the framework.

In developing this framework, consideration of any previous resettlement and compensation practices by the site is required to understand the context in which future practices and compensation will occur:

An important component of the framework is a review of mining, land, compensation, housing and other relevant national legislation to determine the minimum requirements as per the host country. A gap analysis must be conducted between these requirements and that of the LRP, to determine a clear approach to bridge this gap. The legal review should:

- Identify any gaps or shortcomings in the current legal framework.
- Determine how these gaps can be addressed to ensure compliance with host country requirements.
- Outline a strategy for transitioning from current practices to a new, more robust framework.
- Ensure alignment with international best practices and standards.

If past practices were sub-standard, future practices may elicit grievances from historically displaced households. The displacement framework should highlight this potential risk and consider the approach to deal with these grievances.

If past practices exceeded requirements, a benchmark has been set for the site's affected community – who may expect the same. The displacement framework must acknowledge this benchmark. To the extent possible, future practices and compensation must be aligned to this benchmark.
also consider land access alternatives if negotiated settlement cannot be reached.

An equally important component is the entitlement matrix and compensation strategy, including the approach to valuation of assets and determination of rates according to which various assets will be compensated, while recognising that actual compensation rates will only be determined during the development of the (4F.2 Guidance, Task 7).

Aligned with the IFC PS5 requirement, compensation for loss of assets as a result of physical or economic displacement must be provided at replacement cost, and the compensation package must include other assistance, such as various types of allowances and transitional assistance.

Adequate consideration of vulnerability and gender aspects during the resettlement process is required to avoid disproportionate and/or unforeseen impacts on vulnerable or marginalised groups. Measures to allow meaningful participation by these groups must be embedded in the displacement framework.

Table 4F.5 (see 4F.4 Tools and guidance notes) provides the scope and contents of a Displacement Framework, accompanied by guidance notes on each aspect. Once completed, the displacement framework must be approved by Group. The displacement framework should be reviewed upon completion of resettlement implementation (at the time the project team hands over to the operations team) or when there are changes in local legislation or international good practice standards.
Task 4 - Conduct scoping

The purpose of this task, the first of a resettlement Phase 1 – Scoping and framing study, is to ensure adequate consideration to avoid or minimise displacement. The scoping undertaken during this task should build on the provisional estimates of displacement impacts and affected areas defined during Task 1 (see 4F.2 Guidance, Task 1). Scoping is undertaken by the project team and separately for each resettlement project which progresses from pre-concept into Phase 1 planning. Scoping involves:

- Using available data (such as aerial or satellite imagery, data collected by operation teams, etc.) to estimate the approximate number and distribution of affected households;
- Determining the types of land uses (cultivation, grazing, residential, burial grounds, etc.) that will be affected, and the approximate number of hectares of each land type to be affected;
Upon completion of this task, the following must be in place:

Impacts included in (see 4F.2 Guidance, Task 2) must be updated by the operations team once the scope of a resettlement project is refined.

Identifying access routes to services (schools, health facilities, etc.) and resources (water, grazing, agricultural land, cultural heritage, etc.) that may be disrupted through land access; and

Identifying measures that can be considered to avoid or minimise displacement impacts. Avoidance and minimisation are most successfully achieved through design alternatives (such as changing the location of infrastructure and waste management facilities or considering underground as opposed to open pit mining methods) and operational changes.

However, mitigation of and other impacts causing displacement is another way through which avoidance can be accomplished. It should be noted, though, that efforts to avoid or minimise displacement may not stop at scoping; they may be ongoing until finalisation of detailed planning (see 4F.2 Guidance, Task 7).

CHS evidenced and justified confirmation regarding the need for land access which results in displacement and subsequent resettlement;

sound justification for why displacement cannot be avoided or further minimised, supported by evidence of design alternatives and other measures considered; and

a clear scope for the resettlement project, including approximate number of households, hectares of potentially affected land types, and other affected infrastructure and assets.

SHIRA
Task 5 - Establish resource plan and management framework

Contents in this section:
Task 4 - Conduct scoping
Task 5 - Establish resource plan and management framework
Task 6 - Develop resettlement stakeholder engagement plan
Task 7 - Develop management plan
Task 8 - Operationalise management plan
Task 9 - Implement management plan

Resettlement projects require a dedicated cross-functional team, including strong project management skills and resettlement expertise. To ensure a resettlement project is adequately resourced, a resource plan must be developed for resettlement planning, implementation and close-out. The resource plan must be commensurate to the size, potential impact and risk of the project. The team structure, as well as roles and responsibilities must be clearly defined.

If adequate resources and resettlement expertise are not available internally, engagement of external experts with suitable local knowledge is required.

To ensure strong project management, a project management framework (PMF) must be established that is aligned with the requirements of the project. The PMF must include as a minimum:

- Communication protocols;
- Cross-functional work breakdown structure (WBS), including the critical path, dependencies between activities, inputs or decisions by external stakeholders, and when land access is required;
- Budget and schedule, aligned with the WBS;
- Progress reporting procedure and requirements,
- Record keeping and document management procedure;
- Change management plan;
- Human resources plan; and

4. IMPACT AND RISK PREVENTION AND MANAGEMENT
The must also define the governance structure for the resettlement project. As a minimum, a multidisciplinary Steering Committee (SteerCom) must be in place, and include representation from the resettlement project team, operations team and the General Manager, BU and Group SP. BU functions represented on the SteerCom must include, as a minimum, CR, Legal, Mine/Asset Planning, Strategic Planning, Technical/Projects, and Finance. The SteerCom will play a high-level advisory and oversight role for the resettlement project, will be responsible for senior level stakeholder engagement and will instigate independent reviews as required. The SteerCom requires a well-defined mandate and become operational once resettlement planning commences (see 4F.2 Guidance, Task 7).

Risk, legal and commitments register.

PMF
Task 6 - Develop resettlement stakeholder engagement plan

Contents in this section:
Task 4 - Conduct scoping
Task 5 - Establish resource plan and management framework
Task 6 - Develop resettlement stakeholder engagement plan
Task 7 - Develop management plan
Task 8 - Operationalise management plan
Task 9 - Implement management plan

Genuine engagement is fundamental to building trust with displaced households and to eventual successful resettlement. Informed by the site's Stakeholder Engagement Plan (SEP) (see Section 3A), a Resettlement Stakeholder Engagement Plan (RSEP) must be developed by a resettlement expert. The purpose of the RSEP is to guide engagement from the commencement of displacement management planning (see 4F.2 Guidance, Task 7). The RSEP must be updated periodically as the resettlement process progresses. An RSEP is needed because of the lack of specificity of the SEP to address land access, compensation and resettlement activities, and the fact that the SEP should be specifically focused on displaced households and/or individuals, rather than on all local stakeholders. However, the RSEP and SEP must be aligned.

The RSEP must address engagement methods and activities with the displaced households and/or individuals at various stages of the process. Critical to the RSEP is the design of a resettlement working group (RWG) or similar committee(s), depending on project requirements, context, institutional arrangements and needs of displaced communities. The formation of the RWG happens as part of development (see 4F.2 Guidance, Task 7), when this aspect of the RSEP must be updated. The RWG is distinct from the CEF (Section 3A) and other site-level engagement platforms in the same way that the RWG is distinct from the SEP, in that it is specifically focused on resettlement-related consultation. More than one or similar committee can be established. The resettlement project team must apply the same guidance provided for establishing a CEF.

The composition of the RWG must include a resettlement expert and representatives from the displaced households/individuals, resettlement project team, and formal and traditional leadership structures as appropriate. The project team must consider the viability of involving civil society and non-governmental organisations in this forum, and ensure that vulnerable groups, women and host communities are included.
The must detail a resettlement-specific grievance mechanism, aligned with the grievance management process established under Section 3B but tailored to the resettlement context. There are important differences in focus and approach to grievance management specific to land access, compensation, resettlement and livelihood restoration.

In addition, the must include, as a minimum:

- Stakeholder mapping, including vulnerability assessment in relation to engagement (see 3A.2 Guidance, Task 3);
- Analysis of stakeholders' capacity and availability to meaningfully participate in the resettlement process;
- An overview of previous resettlement-related stakeholder engagement undertaken at the site, including a summary of issues raised by stakeholders during such engagement (which may be indicative of legacy issues – see 4F.2 Guidance, Task 7);
- Activities, procedures, structures and roles in relation to stakeholder engagement during the resettlement planning process;
- Engagement and communication activities to be undertaken as part of stakeholder engagement;
- Disclosure requirements in terms of the, notifications and other materials; and
- Additional consultation or capacity-building requirements for the, vulnerable people and/or households.

At completion of this task, stage-gate approval may be required before progressing. An assurance review will be conducted, guided by the ICbS Stage-gate - Phase 1 - Phase 2.
Prior to commencement, the project team must be fully resourced as per the resourcing plan (see 4F.2 Guidance, Task 5) and the SteerCom established. This task must only commence if there is a high degree of confidence that the resettlement project is required. Failure to implement the resettlement after starting detailed participatory planning may result in significant risks and impacts.

Resettlement planning is a long and involved process that evolves over time, and should commence, at a minimum, four to seven years prior to when land access is required or the impact resulting in displacement will begin to occur. Different displacement impacts require different types of management plans (see 4F.1 Introduction):

- An A Plan is specific to a given resettlement project, and it builds on the overarching principles and approach defined in the (site-level) displacement framework (see 4F.2 Guidance, Task 3). Development of the A Plan is the responsibility of the resettlement project team, and requires extensive engagement with external stakeholders, including affected communities and authorities.
- CHS, inclusive of a plan to address livelihood restoration, for permanent physical displacement;
- RAP for permanent economic displacement only;
- LRP for temporary physical or economic displacement; or
- LAP Remedial (Corrective) Plan as may be required based on the findings of a close-out audit (see 4F.2 Guidance, Task 11 and Task 12).

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

- A Plan
- CHS
- RAP
- LRP
- LAP
- Remedial Plan as may be required based on the findings of a close-out audit.
Upon commencement of resettlement planning, the resettlement project team must engage the displaced stakeholders regarding the provision of independent legal and/or other experts for the purpose of representing and/or advising the displaced stakeholders during the resettlement process. The resettlement project team must facilitate access to independent experts, and the cost of such services must be covered by the resettlement project.

During this task, a representative from the operations team actively participates in the SteerCom and updates (see 4F.2 Guidance, Task 2) as required. Alignment between the and is maintained and the site team ensures that resettlement planning adequately considers the .

Table 4F.8 (see 4F.4 Tools and guidance notes) presents roughly sequential activities of the displacement management planning process using external consultants and highlights roles and responsibilities for each phase. Each project’s planning phase is context-specific; thus, the sequence and nature of the steps can vary depending on the nuances of the land access required. The must be commensurate to the scale and complexity of the project, context specific, culturally appropriate and aligned with the expectations of the displaced households or individuals. Depending on the type of plan, some components listed in Table 4F.8 may not be required. For instance, in the case of a , sections on replacement housing would be omitted. Vulnerability and gender considerations are required during several of the displacement management planning activities.

Regardless of the sequence and nature of the planning process, its output should be a detailed , , or Remedial Plan, aligned with IFC PS5 requirements and best practice. Table 4F.6 and Table 4F.10 (see 4F.4 Tools and guidance notes) provide guidance on the structure and contents of these .

Where includes impacts on cultural heritage such as graves, the resettlement surveys must collect data on such resources. However, the identification of graves needing to be relocated will trigger Section 4H and a will be required.

If is government-led, management of displacement impacts requires a different approach – see Guidance note 1 in 4F.4 Tools and guidance notes.

When a comprehensive and participatory resettlement planning process, typically implemented over many years, has failed to achieve negotiated settlement with displaced parties, operations and project teams must seek guidance from Group and Group Legal. As a last resort, legal eviction may be considered if: See Guidance note 2 in 4F.4 Tools and guidance notes. Additional considerations may apply if the process involves Indigenous Peoples, including .

Personal data collected as part of this task should be treated and stored in accordance with the Anglo American Code of Conduct and data protection requirements, as well as national data privacy laws and regulations.

Box 4F.3 Management of legacy resettlement projects!
shortcomings in the application of good practice standards. These situations typically occur where land access was secured under any of the following circumstances:

- A government or public entity was responsible for securing land access and managing associated displacement impacts. Under such circumstances, land access is usually secured through a legislated process, which in most cases does not require the comprehensive assessment and management of displacement impacts, including livelihood restoration;
- A previous company or mining partner secured land access and implemented the or . In such instances, national legislative requirements or outdated standards may have been applied, or the appropriate standards may have been applied during planning but not implemented accordingly; and
- Land access was negotiated and resettlement implemented prior to the introduction of good practice standards such as the 5 (in 2006, updated 2012) or The Social Way (in 2009).

When sites are faced with these circumstances, an independent review by an external expert must be conducted to determine gaps in practices and principles applied to the resettlement planning and implementation, when compared to 5. Gaps that pose potential risks or impacts may require corrective or remedial actions. Eligibility, entitlements, compensation and livelihood restoration require specific attention.

Based on the review findings, a Remedial Plan may be required (in the case of government-led resettlements, a Supplemental Resettlement Plan – see guidance note 1 in 4F4. Tools and guidance notes).

The objective of this plan is to set out the corrective actions required to close the identified gaps as far as practically possible. Retrospective alignment with 5 is not always possible, thus the remedial plan must aim to achieve maximum, as opposed to complete, alignment with good industry practice. For each remedial action identified, the following must be specified:

- Gap/issue/review recommendation;
- Description of the activity to bridge the observed gap;
- Responsibility for and timing of the activity;
- Success indicator(s) and responsibility, timing and method for measurement of indicator(s);
- Cost and responsibility for funding the activity; and
- 

It is imperative that remedial actions are identified and planned in consultation with affected .
Task 8 - Operationalise management plan

Contents in this section:

Task 4 - Conduct scoping
Task 5 - Establish resource plan and management framework
Task 6 - Develop resettlement stakeholder engagement plan
Task 7 - Develop management plan
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Task 9 - Implement management plan

Bridging the gap between displacement management planning and implementation is an internal function of the resettlement project team, specifically a close collaboration between the project manager and resettlement expert, with oversight from the SteerCom. The transition from planning to implementation must be initiated once the need for land access has been confirmed and the team is confident it is able to secure and manage the accessed land once vacated.

The focus of this task is on refining and improving components of the developed under Task 7 (see 4F.2 Guidance, Task 7), particularly the following:

- Institutional arrangements for project implementation:
  - Organisations or entities (for example, national or local government departments, local leadership structures, resettlement project team, independent third party) responsible for delivering each activity in the entitlement framework, noting that the responsibility for some tasks/functions may rest with external entities;
  - WBS
  - Mandate, jurisdiction and financial authority of each institution;
  - Overlapping responsibilities of each institution and human resources;
  - Mechanisms to supervise and coordinate the implementation activities of all institutions; and
  - Adequacy of the internal resettlement project team for implementation and effect changes as required.

- Implementation and schedule:
  - WBS
  - Detailed of implementation activities;
  - WBS
  - Month-by-month schedule – enough time must be allowed for acquiring replacement land, constructing...
The operations team remains active on the SteerCom and ensures alignment between the resettlement plan and other site-based activities. The deliverables at the end of this phase must be documented in an Implementation Plan aligned with the requirements of the... An updated ToR must form part of the Implementation Plan. The operations team reviews the Implementation Plan and ensures it is integrated with other operational activities.

A supporting deliverable of this phase is the tender documentation and a ToR for implementation to facilitate the appointment of a suitable resettlement consultant and other service providers (e.g. construction company, removals company, etc.). If the detailed design of replacement housing and/or livelihood restoration was not undertaken as part of development (see 4F.2 Guidance, Task 7), it must be included in the ToR for implementation.

At completion of this task, stage-gate approval may be required before progressing. An assurance review will be conducted, guided by the ICbS.
Task 9 - Implement management plan

Contents in this section:
Task 4 - Conduct scoping
Task 5 - Establish resource plan and management framework
Task 6 - Develop resettlement stakeholder engagement plan
Task 7 - Develop management plan
Task 8 - Operationalise management plan
Task 9 - Implement management plan

Resettlement implementation typically takes place over several years and should commence immediately after the Phase 3 stage-gate review and within 12 months of finalising the (see 4F.2 Guidance, Task 7). Table 4F.11 (see 4F.4 Tools and guidance notes) presents roughly sequential activities of the implementation process and includes indicative roles and responsibilities. Additional activities required in the event of a delay in implementing the are also indicated.

As with resettlement planning (see 4F.2 Guidance, Task 7), the primary activities will be similar irrespective of whether dealing with physical, economic or temporary displacement. However, the sequencing of activities is likely to vary between resettlement projects, and some activities would not be relevant if the project involves only economic displacement.

Independent third-party oversight is required from the commencement of resettlement implementation – see 4F.2 Guidance, Task 11.

Once households have been relocated and assets compensated or replaced as agreed, the responsibility for the remaining implementation activities should revert to the operations team. A transition plan should be jointly developed and implemented over a period of time to ensure the operations team is adequately capacitated to assume the responsibility for the remaining implementation activities and subsequent tasks (4F.2 Guidance, Tasks 10 to 13). As part of this transition, a compliance review (see 4F.2 Guidance, Task 11) is required to check compliance against the

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Do
and settlement is clearly communicated to stakeholders.
As part of implementation (see 4F.2 Guidance, Task 9), a transition plan to transfer responsibility from the resettlement project team to the operations team is implemented and completed. The responsibility for CHECK tasks thus reverts to the operations team.

**Task 10 – Monitoring and evaluation**

The primary purpose of in the resettlement context is to track progress against and completion criteria defined and agreed with the (see 4F.2 Guidance, Task 7). Indirectly, this enables the management of risks associated with incomplete and/or ineffective planning and implementation. For effective evaluation, the plan must provide timely, relevant and concise information that will allow the operations team to determine and demonstrate the degree to which planning and implementation activities are meeting displacement management objectives and proactively identify opportunities for timely correction and/or optimisation of planning and implementation to ensure improved outcomes.

Against pre-determined is essential to demonstrate successful and undisputed progress, impact and completion of the resettlement and/or livelihood restoration process. Table 4F.12 (see 4F.4 Tools and guidance notes) contains examples of such KPIs. Ongoing must be conducted as per the plan developed during resettlement planning (see 4F.2 Guidance, Task 7). It is recommended that monitoring is undertaken internally, and that evaluation is done by external consultants.

Although it is important that is integrated into the site’s and aligned with existing management systems, it must be managed as a separate work stream by designated members of the operations team. The operations team is responsible for overseeing all components and ensuring compliance with The Social Way. Table 4F.2 provides the scope and purpose, responsibilities and reporting requirements of various components.

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<th>Table 4F.2 Purpose, timing and management of components</th>
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The following cross-cutting issues must be considered as part of activities:

- **Determine whether inputs associated with implementation activities and commitments are delivered according to the operationalised M&E DMP.** Requires regular quality control checks of monitoring data and reporting.

- **To be undertaken by the operations team, in collaboration with the RWG to collect and confirm data against pre-defined KPIs.** Reporting to the SteerCom for the duration of implementation. Reporting should track project efficiency and indicate whether changes are needed to improve efficiency. Relevant results, in an accessible format, should be regularly disclosed to displaced communities in collaboration with the RWG.

- **Assess the results of inputs delivered, such as the number of people/households resettled, received replacement land or assets, monetary compensation amounts and livelihood restoration.** Requires regular quality control checks of monitoring data and reporting.

- **Demonstrate if the delivery of inputs and the achievement of outputs are contributing to successfully meeting planning objectives.** The purpose is to clearly illustrate whether the course of action or programme is working, and if changes or corrective actions are needed.

- **Ideally to be undertaken by an independent consultant, twice a year until physical relocation has been completed/livelihood programmes fully operational and thereafter annually until the close-out audit (see 4F.2 Guidance, Task 11).** Consultant must compile a report after every round of monitoring, reporting against predetermined criteria.

- **The report must be reviewed by the resettlement project team to allow for internal reporting and assurance.**

- **Vulnerability and gender sensitivity:** activities must be gender sensitive and inclusive, and show specific consideration for vulnerable groups. Socio-economic and monitoring information must be disaggregated for vulnerable and gender groups on relevant indicators to capture differential impacts of resettlement and livelihood restoration measures.

- **Participatory:** several aspects may benefit from or require a participatory approach, specifically data collection, development of indicators, successful completion criteria and methodologies. Participatory must commence during the planning phase (see 4F.2 Guidance, Task 7) through the involvement of the in planning. Activities must include periodic focus groups with representatives of displaced people to incorporate their concerns and recommendations in the outcome monitoring results or completion auditing process (see 4F.2 Guidance, Task 11). Local authorities, civil society and/or NGOs often take an interest in resettlement projects and involving them in the monitoring process can help establish local relationships built on trust and transparency. A simple way to involve NGOs in is to hold periodic information and consultation workshops to share outcomes of monitoring with stakeholders.

- **Data collection methodologies:** to ensure the validity of findings against baseline indicators, operations teams should ensure that data collection strategies and tools are consistent with the tools used during baseline data collection as part of displacement management planning (see 4F.2 Guidance, Task 7). For example, if follow-up socio-economic surveys are conducted using the same questionnaire as the surveys undertaken during development, it allows for easy comparison of household and community attributes to identify changes over time.

- **Reporting:** progress reports should provide a summary of findings and any recommendations or corrective actions as appropriate. Indicators should be presented in a simple, defined format, to allow for ease of comparison with previous results and present progress on implementation of corrective actions.
Government-led implementation: where a government agency leads implementation, it remains an internal obligation of the operations team to facilitate implementation efforts.

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Independent third-party oversight is required from the commencement of resettlement implementation (see 4F.2 Guidance, Task 9). This oversight is achieved through compliance reviews, the first of which must be conducted six months after the commencement of implementation. If no material concerns are raised by the independent third-party, subsequent compliance reviews should take place annually. If a compliance review, conducted at any point during implementation, identifies material gaps in the implementation process, a follow-up compliance review is required after six months. If material non-compliances have been addressed adequately, annual compliance reviews can resume.

Suitable parties for providing independent oversight may include a reputable and suitably experienced or civil society organisation. If no such organisation is available, an independent consultant (not the same consultant responsible for planning and implementing the resettlement project team and/or operations team should review the findings of compliance reviews to determine if any corrective actions are required and update the plan accordingly.

Where possible, compliance reviews should be conducted alongside other social and environmental audits to allow identification of cross-cutting issues that can only be addressed holistically. If displacement impacts are significant, however, separate reviews may be preferable but information sharing and co-ordination between disciplines remains essential.

The scope of a compliance review should include, but is not limited to, the following:

- Review the DMP and its operationalisation to confirm that these comply with international good practice (see 4F.2 Guidance, Tasks 7 – 8);
- Review progress and monitoring reports to verify that the plan is being implemented effectively and is achieving its intended objectives;
- Undertake targeted engagement with selected stakeholders to confirm the veracity of reported progress and achievement of resettlement objectives; and
- Document the findings and, if necessary, make recommendations for addressing identified shortcomings.

M&E Check
An independent close-out audit must be commissioned once the operations team is satisfied with the outcome of implementation activities. The completion audit should be conducted no more than three years after completing physical relocation (in the case of a temporary displacement only) and/or after initiation of livelihood restoration activities (in the case of a permanent displacement). In the case of a temporary displacement only, the timeframe for the completion audit may be shortened in accordance with the nature of displacement impacts. The purpose is to determine whether the implementation process was successful in meeting applicable standards and planning objectives, especially in terms of livelihood restoration outcomes. To achieve close-out, criteria indicative of successful outcomes must be agreed with the during planning, and results must be endorsed by the . It should be noted that several external factors can affect resettlement outcomes and complicate full livelihood restoration. As such, the definition of success must be represented as that are both achievable in the socio-economic context and acceptable to the .

The completion audit must be documented in a comprehensive report, including conclusions on the success of physical relocation (if relevant), sustainability of livelihood-restoration measures and close-out (corrective) actions that are required to ensure completion criteria are met. The audit findings must specify whether:

- it is necessary to develop a Remedial Plan; or
- corrective actions should include minor adjustments to existing planning.

At an agreed point after commencement of Task 9 (see 4F.2 Guidance, Task 9), a Post-investment review will be conducted as per the .
Where compliance reviews and close-out audits (see 4F.2 Guidance, Task 11) identify significant non-compliance with the initial displacement planning, associated commitments and desired outcomes, the resettlement project team or operations team (depending on the timing of the compliance review) may be required to develop a Remedial Plan. The purpose of this plan is to identify, implement and monitor corrective actions aimed at addressing the gaps and ultimately achieving the desired outcomes specified in the DMP. For the most part, planning and implementing substantive corrective actions must follow the same process used to develop, operationalise, implement and monitor (see 4F.2 Guidance, Tasks 7 to 10).
Findings from, compliance reviews, the close-out audit as well as development and progress against any remedial plans should be reported to the ExCo, RC, SPMC, and RWG. Post-Investment Review findings and close-out audit findings should also be reported to InvestCo and/or the Group Director.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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### 4F.3 Management and resources

#### Contents in this section:
- 4F.1 Introduction
- 4F.2 Guidance
- 4F.3 Management and resources
- 4F.4 Tools and guidance notes

#### Internal lines of accountability

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<th>COMPANY LEVEL</th>
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| Group         | Director    | LADAR
|               |             | Tracks resettlements included in the pipeline |
|               |             | Approves the initiation of new resettlement projects and any related capital requirements |
|               |             | Approves the scope of review by GIA |
|               |             | Stage-gate approvals |
|               |             | Conducts Investment Assurance and make recommendations to InvestCo |
|               |             | Advises on potential resettlements to be included in the pipeline |
|               |             | Provides input into strategic decisions to proactively relocate communities |
|               |             | Represents Group on the Resettlement SteerCom |
|               |             | Provides advice and input to operation and project teams on how to meet standards and requirements relating to LADAR |
|               |             | Makes recommendations regarding the level of assurance of resettlement projects and on the scope of reviews where resettlement is being covered |
|               |             | For each resettlement project, undertakes scheduling and budget approvals, considers escalated issues and potential risks associated with the resettlement |
|               |             | Considers proposals to proactively relocate communities and makes a recommendation to /Group Director InvestCo CR |

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### 4.IMPACT AND RISK PREVENTION AND MANAGEMENT

#### 4F Land Access, Displacement and Resettlement

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**RELEVANT FUNCTIONS**

- Legal (including teams responsible for land transactions and acquisitions)
- Government Relations
- Mine/Asset Planning
- Strategic Planning
- Technical/Projects

**OPERATION TEAM**

- Alongside Group, makes recommendations to regarding resettlements to be included in the pipeline
- Provides advice on national legislation and regulations pertaining to LADAR
- Acts as contact point with regional and national authorities
- Chairs/represents on the Resettlement SteerCom
- Accountable for the implementation and delivery of the DMP while managed by a project team (as opposed to the site team)

**BU SP**

- Assists in the identification of potential resettlements to be included in the pipeline and makes recommendations to the Head of Corporate Affairs
- Provides input into strategic decisions to proactively relocate communities

**SP**

- Oversees the development of the land access and displacement strategy, updating of SHIRA, and development of a displacement framework
- Provides input into resettlements for inclusion in the pipeline and strategic decisions to proactively relocate communities
- Engages Security/Protection Services to secure and maintain land access
- Ensures participation of a suitable operations team representative on the Resettlement SteerCom
- Ensures compliance and manages legal liabilities
- Provides guidance on the legal framework around LADAR in a given context
- Reviews and approves any agreements or MOUs with other stakeholders
- Investigates land right claims not recognisable under national law
- Actively involved in securing and maintaining land access
- Provides guidance in cases where legal eviction is required
- Supports the resettlement process through liaising with relevant government counterparts on the resettlement approach
- Engages and collaborates with relevant government stakeholders where appropriate and required for the implementation of the DMP
- Drafts and develops agreements or MOUs with government authorities where required
- Collaborates with other Functions to avoid or minimise displacement
- Provides input into strategic decisions to proactively relocate communities
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4F.4 Tools and guidance notes

Contents in this section:

4F.1 Introduction
4F.2 Guidance
4F.3 Management and resources
4F.4 Tools and guidance notes

4F. Tool 1 – Land access and displacement strategy

The land access and displacement strategy is compiled per site. It is developed by the operations team with Group/support and assistance from consultants if required, and it identifies the resettlement project(s) that may be required for the site. No consultation with external stakeholders should be undertaken during its development.

Table 4F.4 Template for the land access and displacement strategy

<table>
<thead>
<tr>
<th>Chapters</th>
<th>Headings</th>
<th>Guideline</th>
</tr>
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<tbody>
<tr>
<td>Preamble</td>
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<tr>
<td>Introduction</td>
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<td>Cover page</td>
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<tr>
<td>List of authors and reviewers</td>
<td></td>
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<tr>
<td>Abbreviations and acronyms</td>
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<tr>
<td>Glossary</td>
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<tr>
<td>Table of contents, list of figures, tables and appendices</td>
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</table>

Abbreviations and acronyms: should provide a table listing all abbreviations and acronyms used throughout the Plan, these should be consistent with internationally accepted definitions and conventions.

Glossary: should provide a definition of terms and key concepts used throughout the Plan. It is advisable that definitions are as far as practically possible based on definitions proposed by The Social Way and good practice guidance such as IFC PS.
Like the land access and displacement strategy, the displacement framework is compiled per site by the operations team with Group/support and assistance from consultants if required. This ensures that each individual resettlement project at the site is conducted according to a consistent set of principles and procedures. Its development is an internal exercise and does not involve engagement with external stakeholders.

Table 4F. 5 Scope and contents of a displacement framework and corresponding guidance notes

<table>
<thead>
<tr>
<th>Structure and content of Strategy</th>
<th>Land access and displacement context, schedule and phases</th>
<th>Land use and socio-economic context</th>
</tr>
</thead>
<tbody>
<tr>
<td>Present and discuss the land access schedule in relation to the schedule of other key processes (e.g. mine planning, legal land access negotiation process)</td>
<td></td>
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<tr>
<td>Provide summary of land use and socio-economic context to inform identification of potential risks and impacts associated with unencumbered land access. Summary should detail prevailing land tenure and administration, land-based livelihoods, settlement patterns and other socio-economic activities that might be impacted.</td>
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<tr>
<td>Identify preferred project land use for major component, as well as potential land use restrictions, direct and indirect displacement triggers and impacts associated with all land to be acquired/accessed, disaggregated in terms of project components or land parcels as appropriate.</td>
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<tr>
<td>Identify and map land requirements</td>
<td>Description of envisaged land inventory</td>
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<tr>
<td>Detail all land requirements (temporary and permanent), including exploration and expansion areas, and likely buffer zones required for mitigating potential impacts. Operation teams should confirm land requirements with design or engineering teams and other relevant project teams.</td>
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<tr>
<td>Include table summary (including supporting maps) listing the following for each affected land parcel: (i) preferred land rights, land access mechanism and the associated land transaction requirements, process and timeframe, (ii) cadastral information (ownership, size, extent, third party interests), (iii) prevailing land use and available land user information, and (iv) land encumbrances which can complicate access, including any land claims and/or legal disputes; existing servitudes, rights of way or wayleaves; and potential land use planning conflicts. The data should be generated from a comprehensive GIS database.</td>
<td></td>
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</table>

Impact identification

Scoping of displacement management measures

Identify potential displacement impacts based on envisaged land access and existing and anticipated land activities. Map and describe cases of displacement in terms of the land parcels comprising the applicable land area, nature of displacement, estimated magnitude of displacement impact per delineated area, and design alternatives considered as part of to avoid displacement or minimise its magnitude.

Risk assessment

Mitigation measures

Identify potential displacement risk based on envisaged land access and existing and anticipated land activities. Identify suitable measures for avoiding and/or mitigating identified risks.

Phasing of requisite land access

Modifications of project footprint

Definition of resettlement projects

Outline estimated schedule indicating when land access would be required for various parts of the project footprint. Motivate if the footprint of land to be acquired at a given time should be modified to avoid or minimise fragmentation of communities or other impacts.

Based on the above, define a set of resettlement projects for the site, indicating the geographical area of land to be covered by each resettlement project and when that resettlement project will need to commence to achieve timely land access or avoidance of impacts on communities.
Chapters

1. Introduction
2. Overview of The Social Way
3. Overview of systems
4. Legal principles and impacts
5. Resettlement overview

1. Purpose, scope and content (structure) of the displacement strategy.
2. Outline the company's commitments in respect of the approach to land acquisition (e.g. achieving negotiated settlements, sometimes through mediation or corrective plans), as well as between national and international requirements.
3. International standards addressed in the document should include national, regional and international principles for responsible business. These may be found in, e.g., IFC 1, 5, 7 and 8; and human rights policies.
4. Describe the site in terms of its administrative and regional setting, indicative land access schedule, required land rights and tenure, and suitable land for resettlement.
5. Describe the site context and structure.
6. Outline the purpose, scope and content (structure) of the displacement strategy.
7. Document existing or planned measures to avoid and/or minimise displacement. Where appropriate this section should include any pre-feasibility, screening/scoping or impact assessment studies that resulted in revision of the footprint and reduction in expected duration of land access (as set out in the site's land access and displacement strategy).
8. Strategies to avoid displacement, protect displaced people and their lands, and to minimise and/or avoid displacement impacts.
10. Social Way: Should present in the format of a table).

Abbreviations and acronyms: should provide a table listing all abbreviations and acronyms used throughout the Plan, these should be consistent with internationally accepted definitions and conventions. Glossary: should provide a definition of terms and key concepts used throughout the Plan. It is advisable that definitions are as far as practically possible based on definitions proposed by The Social Way and good practice guidance such as reviews contained in planning documentation disclosed by international institutions.

Framework status documentation preparing/approving, process for objectives and principles, and motivating.

Refer to the site's land access and displacement strategy (Task 1) in which the resettlement project(s) for the site are defined. The chapter should summarise applicable national legislation, regulations and policies related to land acquisition, safety through planning responsibilities and implementation phases for each project. Specify the functions for which authorities, the resettlement project team and consultants will be responsible during the planning and implementation steps. Where possible, avoidance and/or minimisation of displacement impacts, consultation, participation and grievance procedures.

Avoid displacement.

Site land access and displacement strategy, types of plans required (preferably presented in the corrective actions). The resettlement project team and consultants will be responsible during the planning and implementation steps.

Roles and process implementation, planning and resettlement envisaged objectives and principles.

Where possible, avoidance and/or minimisation of displacement impacts, consultation, participation and grievance procedures.

Site context and structure.

Framework status documentation preparing/approving, process for objectives and principles, and motivating.

Outline the purpose, scope and content (structure) of the displacement strategy.

1. Purpose, scope and content (structure) of the displacement strategy.
2. Outline the company's commitments in respect of the approach to land acquisition (e.g. achieving negotiated settlements, sometimes through mediation or corrective plans), as well as between national and international requirements.
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Abbreviations and acronyms: should provide a table listing all abbreviations and acronyms used throughout the Plan, these should be consistent with internationally accepted definitions and conventions. Glossary: should provide a definition of terms and key concepts used throughout the Plan. It is advisable that definitions are as far as practically possible based on definitions proposed by The Social Way and good practice guidance such as reviews contained in planning documentation disclosed by international institutions.
M&E

Identify all role players that will be involved in the planning and implementation process, including affected people, company

1. Socio-economic profile of communities
2. Land tenure regime
3. Communities
4. Stakeholders
5. Impacts

Organisational roles
Requirements
Monitoring and Reporting
Indicators
Framework and objectives
Evaluation
Stakeholder engagement
Stakeholders and identification
Principles
Objectives and engagement
Stakeholder framework
Entitlement packages
Options and compensation
Valuation approach
Eligibility
Persons/groups vulnerable
Impacts on local authorities and host communities
Impacts on displaced persons
Previous issues related to
Identified legacy and criteria
Vulnerability groups
Land use, livelihoods
Land tenure regime
Communities
Socio-economic and implementation activities.

Define chapter will form the basis for the development of a
previously. Describe the consultation and engagement structures to be established during detailed resettlement planning. This
Also establish the general stakeholder engagement principles adopted for the site and summarise any engagement undertaken
Describe the stakeholder engagement requirements during the various activities of resettlement planning and implementation.

Valuation: Define the valuation methods that will be used to quantify the loss of assets and/or livelihoods as a result of
definition of a legitimate cut-off date will be instated. Also define the categories of persons who will be considered eligible for compensation.
Eligibility: Define the process through which eligibility will be determined and specify the mechanism/process through which a
eligibility person. This framework will guide the formulation of a detailed entitlement matrix during development of the
framework describing internal and external compensation of a combination of these, as

Potential differential graves or cultural heritage resources, loss of natural resources, and loss of access to any of the above.
Provide a high-level estimate of potential displacement impacts on affected persons, including displaced households, local
communities

Identification (in chapter 7) of suitable measures to compensate for losses and mitigate displacement-related impacts so as to
should be sufficiently detailed to enable: (a) accurate identification of expected displacement impacts and how these impacts
impact assessment studies), describe land use and socio-economic conditions in the site’s Area of Influence. This description
Using data from available sources (including the land access and displacement strategy, existing baseline profiles and previous

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Chapters

1. Policy and legal impacts
   and predicted impacts

2. Introduction
   and overview of project
   context

3. Gap analysis and way
   policy requirements

4. Description of national legislation
   and customary tenure systems

5. Avoidance of displacement
   and minimisation of displacement

6. Requisite land access and
   economic losses, livelihood
   restoration, implementation
   teams, etc., will be calculated.

7. Budget. This should be
   based on available information
   regarding the types and magnitude
   of displacement, as well as
   indicative schedule.

8. For each resettlement project
   covered by the displacement
   framework, provide an initial,
   high-level estimate of the
   required budget. This should
   be based on available information
   regarding the types and magnitude
   of displacement, as well as indicative
   schedule.

9. Provide an indicative schedule
   for preparation of DMPs,
   indicating process (e.g. construction/
   development schedules, grave
   relocation, environmental
   authorisations, etc.) should also be
   considered.

10. Document existing or planned measures to avoid
    and/or minimise displacement. The results of
    these efforts should be documented and illustrated. Where avoid-
    ance and/or minimisation are not possible, sufficient motivation/
    justification should be provided.

11. Document existing or planned measures to avoid
    and/or minimise displacement. The results of
    these efforts should be documented and illustrated. Where avoid-
    ance and/or minimisation are not possible, sufficient motivation/
    justification should be provided.

12. Document (a) the scope of and rationale for the resettlement
    project; (b) the purpose, scope and content (structure
    and conventions. The Glossary should provide a definition of
    terms and key concepts used throughout the plan.

13. Abbreviations and acronyms used throughout the Plan should be
    consistent with internationally accepted definitions

14. Table of contents

15. List of figures, tables and
    appendices

16. List of authors and contributors

17. Cover page

18. Table 4F. Scope and contents of a
    framework
LRP, including instatement of the cut-off date, surveys, stakeholder engagement, etc., should be accompanied by a database containing the complete results of the census, socio-economic results, land and asset survey results, and other baseline process objectives and principles. The methodology and implementation strategy of the respective surveys should be documented and appended to the various surveys (e.g., the socio-economic dataset should indicate which asset owners/users reside in which location, employment status, monthly profit, and employee salaries. All individuals who will have to relocate their primary residence (including tenants, informal occupants); and all persons who will be economically displaced and nature of displacement (including seasonal users of land/resources, loss of employment or source of subsistence, etc.) should be identified. All owners of affected land, structures, and other assets, including type of ownership for each asset – formal, informal, or customary – should be identified. Affected land is partially or whole land is partially, and whether the tenure regime is affected. The socio-economic baseline survey results should be presented in a manner that provides an in-depth understanding of the demographics of affected communities, their living standards, sources of income, access to and utilisation of services and infrastructure, access to and reliance on natural resources, vulnerability, social networks, cultural/spiritual (graves, sites of cultural heritage, etc.) and economic resources (roads, bridges, infrastructure, water points), schools, clinics, structures, etc. and preferences in utilisation of services and infrastructure, access to and reliance on natural resources, vulnerability, social networks, cultural/spiritual (graves, sites of cultural heritage, etc.) and economic resources (roads, bridges, infrastructure, water points), schools, clinics, structures, etc.) and preferences. The purpose of the baseline chapter is to provide (a) sufficient context to accurately quantify displacement impacts (chapter 8); and (d) quantifiable demographic, economic, educational, occupational, and health indicators that can be used as a benchmark for M&E during the implementation process. Roles and responsibilities (including those of authorities, Anglo American and consultants) should be defined for the implementation process. This should be followed by a detailed description of activities to be undertaken during implementation of the plan (which is the focus of chapter 6); (b) information on vulnerability that may cause some households, persons, or groups to be disproportionately affected by displacement (chapter 7); (c) information needed to adapt the entitlement framework provided in the site’s displacement framework to address any project-specific impacts or requirements (formulated in chapter 13).
Analysis of displacement impacts

1. Displacement impacts resulting from loss of structures, including effects of (a) physical displacement resulting from loss of residential structures, (b) economic displacement resulting from loss of business structures and, (c) displacement of community facilities/infrastructure.

2. Impacts resulting from loss of land, including (a) economic displacement resulting from loss of farmland, trees and crops, and (b) economic displacement resulting from loss of other types of land.

3. Impacts on graves and cultural heritage, and access to infrastructure, services and natural resources.

4. Impacts on host communities.

This analysis of impacts is undertaken by superimposing the project's requisite land access and process (chapter 2) on the baseline profile (chapter 5).

Displacement impacts usually extend beyond the physical loss of assets and therefore often require mitigation over and above regulated compensation and/or livelihood restoration. Consequently, this chapter should include a qualitative analysis of the indirect impacts of displacement in the prevailing socio-economic context. It should also discuss any potential impacts on host communities, including secondary displacement.

Vulnerable people

1. Overview of vulnerability within the Project context.

2. Vulnerability criteria and indicators.

3. Identification of vulnerable people.

4. Assistance for vulnerable groups.

This chapter should (a) draw on information from the baseline chapter to clearly define groups that are or may become at risk as a result of displacement; (b) define appropriate, context-specific criteria and indicators to determine vulnerability; and (c) provide an analysis of potentially vulnerable groups and formulate special provisions that will be made to assist each group.

Entitlement matrix and compensation strategy

1. Eligibility criteria and categories.

2. Cut-off date for eligibility.

3. Overview of national and international valuation requirements.

4. Description of asset-appropriate valuation methods: land types; residential, communal and other structures; graves and ritual sites; tenants and rental rates; RWG.

5. Eligibility.

This chapter should quantify replacement land requirements based on the results of the asset survey and measures requiring replacement land identified in the entitlement framework. It should also describe criteria agreed with affected parties to select a suitable relocation site/replacement land; these may include access to services, infrastructure and natural resources, and proximity of and impact on host communities. Identified options for replacement land should be listed, and a description provided of how the agreed criteria were applied to rank them.

The description of the process for acquiring replacement land should note any permitting or rezoning requirements, studies required or conducted to ensure suitability of selected sites, and the process for procuring, developing and allocating replacement land or residential plots.

In cases of physical displacement, the following must be included:

- The chapter should also detail the handover process as well as care and maintenance arrangements, especially if replacement housing is provided.
1. Specific aspects related to gender
2. Specific aspects related to vulnerability
3. Partnerships/linkages for implementation

Consultation and disclosure

1. Stakeholder engagement principles and objectives
2. Consultation structures and process – stakeholder identification, consideration of vulnerable groups, engagement planning, etc.
3. Summary of consultation activities – engagements and outcomes
4. Engagement plan for further stages
5. Plan disclosure

This chapter should identify the stakeholders who were involved in development of the plan and describe engagement activities undertaken during preparation, planning, disclosure, approval of the plan. Records of how information about compensation, eligibility, resettlement assistance, grievance redress, etc. were disseminated to relevant stakeholders (including vulnerable and/or minority groups) should be included in the chapter.

The chapter should provide a detailed description of the engagement mechanism, including its mandate, composition, roles of participants, and mediation mechanisms. A summary of the views expressed by stakeholders, as well as an account of how these views were addressed in the plan, must also be included. Detailed engagement records should be included as appendices to the plan; these normally include stakeholder comments and grievances (indicating follow-up actions/responses), a log of all meetings conducted as part of resettlement planning, attendance registers, and a summary of main issues discussed.

It is also necessary to confirm stakeholder engagement requirements for the implementation, and close-out phase of the plan (Tasks 9, 10 and 11).

Grievance management

1. Principles
2. Grievance registration procedure
3. Summary of grievances received to date

This chapter should detail the guiding principles that will be applied to ensure the resettlement grievance procedure is aligned with The Social Way requirements (Section 3B). A detailed description of the grievance procedure should be provided, including a description of the steps in the process, information management and the parties responsible for the various phases of the grievance process. The procedure should detail how unresolved grievances will be managed through arbitration/mediation or the judicial system. The grievance mechanism should establish performance monitoring procedures and, in line with the site/The Social Way framework, and indicate how resettlement-related grievance management will be integrated with the overall site engagement and grievance management strategies. If any grievances have been submitted at the time the is compiled, the nature, status and resolution of these should be indicated.

Monitoring and evaluation framework

1. Monitoring and evaluation objectives
2. during implementation
3. Compliance review and close-out audit

This chapter should cover:

For each of these components, the following should be specified:

- Responsible parties;
- Activities to be undertaken;
- Frequency and timeline of activities;
- Indicators or criteria to be used to demonstrate progress, effectiveness and/or compliance; and
- Reporting requirements.

Internal and external reporting

Objectives and internal monitoring and external evaluation of monitoring data, as well as external oversight (Task 10); and

Compliance reviews and close-out audits (Task 11).
Implementation, scheduling and financing

1. Implementation responsibilities
2. Time schedule (including review of compatibility of resettlement schedule with overall project construction and development schedule)
3. Budget and arrangements for financing

Institutional arrangements: Document the organisational structure and institutional arrangements for implementing the Plan. It should confirm the details of the institution(s) responsible for delivery of the entitlements and livelihood restoration programmes (including external service providers) and confirm how resettlement activities will be coordinated.

Schedule: should highlight key milestones, dependencies, assumptions and potential risks to the schedule.

Budget and financing arrangements: should include an estimated budget for all resettlement-related costs, including contingencies. It should account for inflation effects and currency fluctuations and confirm how the costs will be monitored and evaluated. It should note whether any costs are to be government or partner-funded and how these disbursements will be coordinated.

4. F. Tool 4 – Land access scenarios per tenure arrangement

In the table below, the term “project footprint” denotes any land required for mining/processing purposes, as well as applicable health and safety buffers.

<table>
<thead>
<tr>
<th>Displacement categories</th>
<th>Scenarios</th>
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<tbody>
<tr>
<td>Displacement of individuals and communities that have formal legal rights to land and/or assets they use and/or occupy</td>
<td>Persons or communities who own the land within the project footprint under legal title, i.e. private tenure</td>
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<tr>
<td></td>
<td>Persons or legally own affected buildings and infrastructure within the project footprint</td>
</tr>
<tr>
<td></td>
<td>Institutions who own land and/or buildings within the project footprint</td>
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<td></td>
<td>Owners of economic trees, perennial and/or seasonal crops, either on their own land or on the land of others</td>
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<td></td>
<td>Legitimate owners or custodians of recognised cultural heritage assets such as graves, sacred/spiritual sites, etc.</td>
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<td></td>
<td>Tenants of houses and/or land – i.e. persons who, while not owning the house or land, have formalised right of occupancy through formal rental/lease agreement</td>
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<td></td>
<td>Employees of formal businesses (i.e. entity with tax statements and auditable records) that will be displaced as the business will become unviable as a result of land access by the company.</td>
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<td></td>
<td>Individuals that depend directly/indirectly on the land and structures within the project footprint for sustaining their livelihood, through formal agreements to graze livestock, practice agricultural activities</td>
</tr>
<tr>
<td>Displacement of individuals/communities that do not have formal legal rights to land and/or assets but do have a claim which is recognised under national law.</td>
<td>Persons who have the customary right of occupancy of affected land</td>
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<td></td>
<td>Owners of standalone informal business structures, such as kiosks, market stalls, bars, clothing manufacture, furniture manufacture, etc.</td>
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<tr>
<td></td>
<td>Tenants of houses and/or land – i.e. persons who, while not owning the house or land, have right of occupancy based on verbal or informal agreement</td>
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<td></td>
<td>Land required by the project is used on an intermittent/seasonal basis for livelihood purposes such as seasonal grazing, agriculture, etc.</td>
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</table>
Displacement categories

Scenarios

- Displacement of individuals/communities who have no recognisable legal right or claim to land and/or assets they occupy or use. Include persons who have constructed buildings or have cultivated crops on land owned by another, without approval and/or knowledge of the landowner. This also includes informal users on public or private land.

- Encroachers that, without consent, have settled on and/or use project owned/leased land for residential and/or livelihood purposes.

- Informal users of land – for example, persons who collect firewood, herbs and medicines, and other natural resources without knowledge and/or any consent of landowner.

- Individuals using land regularly for grazing livestock.

4F. Tool 5 – Displacement management planning activities

Table 4F. 8 Displacement management planning – roles and responsibilities

<table>
<thead>
<tr>
<th>Planning phase</th>
<th>Resettlement project team</th>
<th>Resettlement consultants</th>
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<tbody>
<tr>
<td>Confirm displacement impacts and initiate management planning</td>
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<tr>
<td>Identify and appoint service providers</td>
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<tr>
<td>Initiate planning process</td>
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<tr>
<td>Confirm whether a Remedial Plan is required based on the refined resettlement scope (Task 4).</td>
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<tr>
<td>Develop a ToR for the resettlement project which defines the type of plan required, the nature and scale of displacement and the resettlement timeframe; supplies other relevant information (e.g. on previous resettlement and local community dynamics); and emphasising the need for complying with 5.</td>
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<tr>
<td>SteerCom to approve the ToR</td>
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<tr>
<td>Depending on the scale and complexity of the resettlement project, consultants could be involved to develop a ToR.</td>
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<tr>
<td>Based on identification of vulnerable groups, demonstrate due consideration for any disproportional impacts on vulnerable groups considering their sensitivity and coping capacity, including any disproportionate impacts expected across gender or other marginalised groupings such as indigenous peoples.</td>
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<tr>
<td>Identify suitably experienced consultants and issue the ToR.</td>
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<tr>
<td>Conduct technical and financial evaluation of the consultants' proposals.</td>
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<tr>
<td>Develop proposal based on the ToR.</td>
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<tr>
<td>Comment on risks associated with the resettlement project and proposed approach contained in the ToR.</td>
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<tr>
<td>Ensure that the scope of work requires the resettlement expert to demonstrate a clear and practical approach to ensure identification and full participation of vulnerable, gender and/or marginalised groups. Project planning should indicate special provisions required in terms of identifying, verifying and engaging vulnerable and/or gender groups as well as how data collection, disclosure and entitlement negotiations will be tailored to ensure inclusivity. This should include specific resourcing requirements for identifying, engaging and assisting vulnerable groups (e.g. gender specialist, social workers, culturally appropriate engagement teams, etc.)</td>
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<tr>
<td>Conduct project initiation meeting with the preferred consultant to ensure a common understanding of scope, timing and expectations.</td>
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<tr>
<td>Review and approve</td>
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<tr>
<td>Develop a project execution plan for the planning process. Provision must be made for review and approval processes by the resettlement project team.</td>
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</table>
Review and confirm land requirements

Completion of desktop-based work

Project execution plan to ensure it is integrated and consistent with project planning and land access schedule. Align the plan with the (Task 5).

Risks to the budget and schedule must be identified and addressed with the resettlement project team.

Obtain confirmation of land access schedule and requirements (Task 4) and share with consultant. Any changes in the schedule and/or requirements must be communicated to consultants.

In the event of changes in the land access schedule, a change management process must be implemented and potential impacts on the planning process identified.

Provide information about efforts undertaken or project alternatives considered to avoid/minimise displacement. Ensure this is documented in the.

DMP

Review land requirements in collaboration with the resettlement project team and with cross-functional input to confirm the resettlement scope and identify implications for management planning.

In collaboration with the resettlement project team, identify potential additional strategies (over and above those identified during Tasks 1 and 4) to avoid/minimise displacement during the remainder of the planning process and document these in the.

DMP

Consideration of legal and informal land tenure and/or usage rights which is often the only type of tenure available to vulnerable groups, women and informal occupants.

Based on an information request from the consultant, provide relevant documentation to the consultant. Ensure a record of information requested and exchanged is kept.

Review and approve measures to address information gaps. These measures must be consistent with the displacement framework (Task 3).

For legal requirements, obtain legal input.

Compile an information request.

Draft desktop-based chapters of the, including legal framework, principles and process, and prevailing socio-economic conditions.

DMP

Review the gap analysis that was conducted during development of the displacement framework (Task 3) to address gaps between national legislative and international good practice requirements. If necessary, adjust the gap analysis to address any project-specific factors or considerations.

Identify potential vulnerabilities and gender considerations that should be expected in the context of the Project and develop criteria/framework to identify/verify vulnerable groups. Reference can be made to good practice standards which provides some generic criteria to assess vulnerability.
Establish Planning principles and process
Stakeholder engagement
Communicate the strategies and associated cost and schedule implications.

Review and approve proposed principles and approach, aligned with the displacement framework (Task 3).
In collaboration with the consultant, establish the... (Task 6).

Develop planning principles (aligned with the site's displacement framework) and a detailed description of planning and implementation processes. Demonstrate that the processes are fit for purpose for timely land access.

In collaboration with the resettlement project team, establish the,... RWG RSEP

The resettlement project team and consultant must commit to provide specific support and/or undertake additional planning to ensure gender equity. Targeted support may include the provision of individual legal assistance, counselling, and psychological support to enable vulnerable groups to participate fully in consultations, surveys and negotiations.

Participate in all meetings.

Review and approve the updated... RSEP

Ensure it is aligned with Section 3A.

Provide input into and approve messaging to and narrative for stakeholders.

Provide information on project related matters that may influence the planning process, including changes in project strategy, design or schedule.

Ensure that stakeholder engagement records are managed as per the... PMF

Engage the... RWG

Update the resettlement project’s... RSEP

Develop standard messaging and story board for engagement purposes.
Develop and agree an entitlement framework and relevant aspects of planning in consultation with the... RWG M&E

Ensure the engagement process is inclusive and makes provision for engagement with gender, minority and vulnerable groups.

Facilitate and document... Stakeholder engagement is the most important mechanism to effectively manage vulnerability and gender-related aspects. It is important to create an inclusive environment in which views, issues, and suggestions can be expressed by all members of the affected community, including women, elderly, youth, and other potentially vulnerable, disadvantaged or marginalised groups. Where inclusivity cannot be ensured, the resettlement project team should provide additional mechanisms or opportunities for engagement. In some countries certain vulnerable groups or individuals are considered illegitimate (for example, the LGBT community, informal occupants, illegal land users, informal tenant), or there may be inadequate or non-existent national laws and regulations for their protection (for example, internally displaced communities and refugees). Consequently, these parties are often excluded from engagement processes. It is important that the resettlement project team ensure engagement forums/committees are inclusive of vulnerable or marginalised groups; where necessary, sub-committees or other alternative engagement methods should be established to reach these groups.
Planning phase

Resettlement project team

Resettlement consultants

Vulnerability and gender considerations

Planning of data collection and survey activities

Community sensitisation: survey process and cut-off date engagement process.

Participate in engagement, sensitising relevant stakeholders (including leadership structures) on the survey process; request approval to commence surveys and schedule accordingly.

Participate in data collection training activities (for example, training of survey staff) to gain familiarity with the process to ensure that due process is followed.

Participate, review and approve survey planning, approach to cut-off date and data collection tools.

Highlight sensitivities in communities that should be considered in the data collection approach.

Review the proposed data management process to ensure that the resettlement project team can access datasets to monitor progress and conduct quality control.

Data collection tools should incorporate appropriate mechanisms to capture a valid and reliable indication of vulnerability – for instance quantitative surveys should capture the views of women even where they are not household heads, similarly the views of the elderly, informal tentants and/or employees should also be captured. The resettlement project team must ensure that any groups that might be disadvantaged in terms of asserting their interests or rights to use land and assets are also recorded during the survey. Survey teams need to include appropriate resources to allow effective engagement with specific vulnerable and/or marginalised groups.

Accompany community sensitisation and introduce data collection team and activities to displaced communities. Where necessary, request support from other stakeholders (for example, leadership structures) and arrange access to communities.

Participate in the announcement of cut-off date/moratorium.

Facilitate sensitisation meetings and communicate survey process and schedule to displaced communities.

Announce and record instatement of cut-off date.

Ensure that displaced communities and authorities understand and agree with land use implications and how future
Execution of survey and data collection activities

Baseline development

Ensure that the process is well documented.

Land use will be monitored for encroachment or speculation.

Oversee execution of surveys. Ensure that survey data is incorporated into the agreed data management system and that the record keeping and document management process is adhered to.

Request regular summaries on progress (as appropriate to the scale of displacement), including predefined outputs from the database as required.

Depending on the nature of survey activities, a representative of the resettlement project team may be required to witness and sign-off completed survey forms, especially census and asset survey forms.

Complete baseline data gathering (census and socio-economic survey, asset inventory).

Obtain initial information (through surveys and/or qualitative techniques) on household preferences in terms of resettlement site and livelihood restoration strategy.

Ensure that the data collection activities are aligned with requirements in terms of survey content and process.

Ensure that data collection is adequate to identify all eligible groups and entitlements.

Review and approve socio-economic baseline report.

Confirm alignment with requirements.

Conduct review of the survey database developed from the census, socio-economic and asset surveys. Confirm completeness, functionality and inter-survey consistency of the dataset.

Ensure that the final survey dataset is imported or integrated into project data management system and that originals of all supporting data, such as spatial data, photographic records, signed asset inventories or census forms and

Prepare a baseline report based on census and socio-economic information gathered during surveys. The baseline should include a comprehensive asset inventory to determine all eligibility and entitlement categories.

Develop and finalise functional survey database and ensure this is consistent with baseline reporting.

Establish criteria to identify vulnerable households and individuals.

The baseline report should identify key performance

Develop a register of groups, households and/or individuals that are potentially vulnerable. It should be noted that identification of vulnerable individuals and households in a resettlement context is an iterative process and will require on-going verification, which can be done through participatory identification and screening processes involving the resettlement committee or a specific vulnerability committee.
Impact assessment

Establish eligibility and entitlements

- Generally vulnerable groups and females will be offered the same entitlements offered to other parties. However, this can only be done on condition that vulnerable groups and women are able to take equal advantage of such entitlements. Alternatively, special entitlements for these groups may need to be developed. In addition provide transitional support tailored to each vulnerable group. It should be noted that where vulnerable groups live in poverty or in poor conditions prior to displacement it is not sufficient for entitlement to livelihood activities to be aimed at restoration only, in such situations, livelihood activities must clearly target improvement.

- Review entitlements, valuation methods and compensation options, especially in-kind compensation and livelihood restoration strategies, and present to the SteerCom for approval.

- Ensure optimal alignment between entitlement framework and existing project initiatives (Section 4A).

- Participate in disclosure and negotiation of entitlement principles and framework to the displaced communities.

- Review and approve draft resettlement agreements. Ensure agreements are consistent with the timing, delivery process and entitlements in the final planning document.

- Draft and submit an entitlement framework which is consistent with the entitlement matrix in the displacement framework (see 4F.2 Guidance, Task 3).

- Demonstrate due consideration of displaced communities’ inputs and preferences in entitlement framework.

- Present and agree the entitlement framework with all affected parties.

- Develop draft resettlement agreements based on agreed entitlements. Agreements should be fully consistent with the timing, delivery process and all entitlements in the final planning document.
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- Estimate replacement land requirements (based on survey findings, impact assessment and entitlements).
- Facilitate identification of available replacement land for in-kind compensation in consultation with the resettlement project team, local authorities and the...

- Consider establishing land and/housing titles in the name of both spouses wherever legally possible. Housing design and location should demonstrate consideration of vulnerable groups for instance accessibility for disabled persons, proximity to medical services for the sick, maintenance assistance for vulnerable households, etc.

- Review framework to ensure it aligns with The Social Way 3.0 and 5, and can be readily converted into a comprehensive stand-alone plan during Task 8.

- Develop framework in consultation with the...

- Monitoring indicators with associated baseline information, methods and completion criteria must be clearly communicated to, understood by and agreed with the...

- Households can become more or less vulnerable due to displacement processes and external factors not related to the project, such as deaths in the family, ill health, loss of employment, crop failures and so forth. It is therefore necessary to ensure that the system includes mechanisms that will allow identification of increased vulnerability or new cases of hardship or changed household circumstances that may indicate a need for additional and/or on-going support.
### 4F. Tool 6 – Terms of reference for a Displacement Management Plan (DMP)

This tool provides guidance for development of a Terms of reference (ToR) for a Displacement Management Plan (DMP).

#### Content provided in Table 4F. 6 is not exhaustive and resettlement project teams should seek guidance from the relevant procurement team. The generic ToR should be refined to ensure it is consistent with the site's displacement framework and commensurate to the scale, complexity and nature of the resettlement project.

#### Table 4F. 9 Sample terms of reference for a DMP

<table>
<thead>
<tr>
<th>Section</th>
<th>Guideline / draft text</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction and context</td>
<td>Present relevant operational details, project components/activities triggering resettlement, and an overview of anticipated displacement to establish the motivation for the DMP.</td>
</tr>
<tr>
<td>Objectives and outcomes</td>
<td>Establish the intention of the DMP and the company's expectations regarding the outcome of the activities in the DMP. Objectives and outcomes should be aligned with The Social Way toolkit and the site's displacement framework (see 4F.2 Guidance, Task 3).</td>
</tr>
<tr>
<td>Adequacy of the resettlement project team</td>
<td>In collaboration with the consultant, compile an implementation schedule that is aligned with the project's land access schedule. Provide input and review the budget, and ensure financial provision is made. The implementation plan should make provision for all applicable feasibility, permitting, internal procurement, financing and budget approval processes that apply to various aspects of plan implementation. Where necessary provide specific transitional in-kind assistance through food aid, health support, health insurance as appropriate.</td>
</tr>
<tr>
<td>Facilitate internal review and approval of DMP</td>
<td>Facilitate internal review and approval of DMP. Ensure the DMP is updated based on review comments or conditions.</td>
</tr>
<tr>
<td>Confirm with relevant internal stakeholders when DMP disclosure can commence</td>
<td>Confirm with relevant internal stakeholders when DMP disclosure can commence. DMP participation and attendance the disclosure process.</td>
</tr>
<tr>
<td>Develop draft DMP based on the content guideline presented in Table 4F.3 (see 4F.4 Tools and guidance notes)</td>
<td>Develop and agree strategy for public disclosure of final DMP (subsequent to approval). Facilitate and document disclosure of the DMP.</td>
</tr>
</tbody>
</table>

Complete the displacement management planning process within the parameters established in the site's displacement framework and/or in alignment with The Social Way requirements to ensure unencumbered land access. Co-design a fair, transparent and negotiated management plan in full partnership with affected parties and other relevant stakeholders. The management plan should set out the process and procedures to be followed during implementation and post-implementation of displacement management measures. Quantify displacement impacts on affected groups, including host communities, vulnerable groups, and indigenous and/or marginalised groups. Anticipate and avoid, or where avoidance is not possible minimize, adverse social and economic impacts from land access or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of...
Scope of work
Describe the scope of work and activities to be undertaken when developing the... the site's displacement framework, the planning objectives set out in the... and the nature, scale and complexity of displacement.

See Table 4F.5 (4F.4, Tools and guidance notes, Tool 2)

Approach and methodology
Request consultants to describe their proposed approach and methodology for meeting the objectives and fulfilling the scope of work.

The approach and methodology should be aligned with The Social Way and prevailing international good practice standards.

Consultants should describe and indicate the sequence of activities. Mandatory activities should include the following:

Available data
Outline available data that will be shared with the successful bidder upon tender award and signature of a non-disclosure agreement.

Typically, the following data should be made available:

Schedule and deliverables
List the required deliverables and associated timeframe. Deliverables should align with key activities listed in the scope of work.

4F. Tool 7 - Land Access Procedure (LAP)
The Social Way requires that operations should address impacts associated with securing land access throughout the life of asset, including disturbance or temporary displacement impacts resulting from short-term or intermittent land access... often required during the discovery phase for exploration drilling, temporary access roads, lay-down areas, construction camps, etc.

Generally, these impacts manifest before the inception of comprehensive management strategies, such as the Displacement Framework (Task 3)... as this documentation is generally only drafted after pre-feasibility in response to long-term and significant project-induced displacement impacts, as opposed to short-term displacement or disturbance impacts.

To deal with displacement impacts resulting from short-term or intermittent land access, a project team must develop and implement a... Objective and application
information, consultation, and the informed participation of those affected.

Improve, or restore, the livelihoods and standards of living of displaced parties.

DMP
LAP

ToR
Kick-off meeting
Progress meetings
Compilation of information request
Risk assessment and project execution planning
Land access and displacement strategy; Displacement framework; Phase 1: Scoping and framing study report; Detailed description of the activity/activities resulting in displacement; Environmental and social screening, scoping and/or impact assessments; Aerial/satellite imagery of the displacement context; Spatial data showing the requisite land access and the site's footprint/infrastructure; Previous and/or on-going displacement management plans and compliance reviews/close-out audits; and Relevant AASW policies and standards.
The main objective of the LAP is to facilitate timely land access while ensuring that any displacement impacts associated with short-term and/or intermittent land access needs are managed in a manner that is consistent with The Social Way requirements. The LAP should be applied when short-term or intermittent land access could result in:

Temporary restriction of landowners’ and/or users’ access to agricultural (crop) land, grazing land, fallow land, or land used for livelihood activities;

Damage to or loss of cultivated land and any standing seasonal crops or economic trees;

Damage to or loss of structures owned/used for residential, business or recreational purposes;

Temporary disturbance in livelihood activities, including restriction in access to place of employment; and

Temporary physical displacement as result of short-term risks to health and safety or damage to place of residence.

Process, roles and responsibilities

The table below gives an example of a process for identifying, assessing, recording and compensating for the impacts associated with temporary or intermittent land access.

Table 4F.10 Example of a Land Access Procedure (LAP)

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
<th>Roles and responsibilities</th>
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<tbody>
<tr>
<td>Introductory sensitisation meetings with stakeholders responsible for administration of targeted land</td>
<td>Inform stakeholders of planned activities and process to be followed. Confirm legal right for temporary land access (based on exploration/prospecting/mining right or lease agreements). Agree on procedure for communication during upcoming activities. Designate site contact person and share contact details.</td>
<td>Engagement led by site team. External stakeholders to be engaged will vary depending on the nature of the land ownership and would include local government/municipality for titled land and tribal authorities for customary land.</td>
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<tr>
<td>Identification of temporary land access needs</td>
<td>Confirm required land areas and duration for which land access is required. Conduct non-intrusive reconnaissance of land to identify: Record reconnaissance finding in site assessment form.</td>
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<tr>
<td>Collation of compensation rates for short-term land rental, disturbance and damages</td>
<td>Develop proposed land rental rates for the area (per hectare/square metre per day/week/month, depending on context. Collate rates proposed for damages (loss of or impacts on structures, crops, trees and other fixed assets). Rates must be based on current market rates and (where necessary) adjusted to provide full replacement value.</td>
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<tr>
<td>Engagement with affected landowners/users</td>
<td>Explain land access needs and process to landowners/users who will be affected. Explain how payments (temporary land rental and compensation for damages to trees, crops and other assets) will be calculated.</td>
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<tr>
<td>Pre-access assessment</td>
<td>Assign unique reference number to each affected landowner/user. Assessment undertaken by independent registered valuer appointed by project team.</td>
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<tr>
<td>Owners/users of required land; Sensitive areas (houses, key access routes, areas subjected to illegal land uses, valuable crops and trees, community facilities, graves, existing public infrastructure reserves/wayleaves, cultural heritage assets, etc.); and Identify options for avoiding or minimising impacts on sensitive areas.</td>
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<tr>
<td>Step Description</td>
<td>Roles and responsibilities</td>
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<tr>
<td>Complete pre-access assessment form containing:</td>
<td>Site, attended by landowner/user and witnessed by local authority representative and project team representative. All parties to sign the pre-access assessment form. Landowner/user and local authority representative to receive copies of the completed form, operation team retains the original (with photographs appended).</td>
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<tr>
<td>Prepare land rental payment for each affected landowner/user based on information in pre-access assessment form.</td>
<td>Approve payments internally. Make payments within an agreed period. If possible, make payments into bank accounts. Where cash payments are unavoidable, put in place appropriate security arrangements. Payments signed by the project team representative and landowner/user and witnessed by local authority representative. Project team representative to record payments in centralised electronic database.</td>
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<tr>
<td>Give at least two weeks' prior notice to landowners/users before accessing land.</td>
<td>If there is a delay of over four weeks between pre-access assessment and land access, update pre-access assessment form to record any changes that may have occurred on the land.</td>
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<tr>
<td>Complete post-access assessment form after activities for which land access was required are complete, and restoration activities have been undertaken. Record:</td>
<td>Form completed by independent registered valuer and witnessed by local authority representative, landowner/user and site representative. Landowner/user and local authority representative to receive copies of the completed form, project team retains the original.</td>
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<tr>
<td>Calculate the damages amount due for impacts on crops, trees and assets, based on types of damage and previously determined compensation rates.</td>
<td>Independent registered valuer. Site representative to capture damages amounts in centralised database.</td>
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<tr>
<td>Review and approve schedule of damages payments. Record approval in centralised database.</td>
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<tr>
<td>Notify landowners/users and make payments. Should be as soon as possible after land is accessed (e.g. within two weeks after post-access assessment).</td>
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4F. Tool 8 – Displacement management plan implementation activities

- Details of landowner/user (including unique reference number);
- Details of affected land (coordinates/location, size, use);
- Assets that will be affected;
- Sensitive features that should be avoided;
- Compensation rates to be applied (based on Step 3);
- Compensation value; and
- Restoration requirements (e.g. repair of fences after land access).

- Land, crops and assets that were affected;
- Restoration activities (e.g. fence repairs) undertaken or still outstanding.
- Land rental payments have been made;
- Damages have been paid for impacts on crops/trees/assets; and
- Restoration actions have been undertaken.
### Table 4F. 11 Plan implementation: Internal and external considerations

<table>
<thead>
<tr>
<th>Implementation phase</th>
<th>Resettlement project team</th>
<th>Resettlement consultants</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Finalisation of tender documentation and contracting appropriate service providers</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Confirmation of asset inventory valuation and quantification of livelihood impact. Finalisation of compensation packages, including livelihood restoration benefits</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Entitlement briefings and sign-off of agreements</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Initiate appointment process with Supply Chain. Determine if level of planning undertaken to date and/or provides enough detail to transition into full implementation or whether additional planning is required. ToR Ensure appropriate technical feasibility studies have been completed for livelihood restoration programmes.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review the execution plan and ensure it includes procurement, capacity building and local content/employment commitments, especially if the scope involves extensive livelihood restoration programmes. Ensure the execution plan makes adequate provision for contractor social management. Review and finalise the implementation plan developed under Task 8. Develop an execution plan consistent with the implementation plan. Depending on the legal context or if there have been delays of more than 12 months since the finalisation of Task 7, verification of assets, review of livelihood impact, and confirmation of compensation amounts as well as livelihood benefits may be required. Complete internal review and approval of compensation options and amounts as well as selected livelihood options. Ensure that funds and resources are readily accessible to execute delivery of compensation (including provision of any transitional support or funds required as part of initiation of selected livelihood restoration option). Attend and observe entitlement briefings and if necessary, provide information on the process and anticipated timing of subsequent in-kind and monetary compensation as well as delivery of livelihood restoration programmes. Review and approve final entitlement agreements. Witness signing of agreements and ensure copies are stored in appropriate digital and hard-copy formats and are readily accessible. Prepare final agreements; ensure that agreements include all commitments agreed to during planning phase, including livelihood restoration, transitional support, maintenance arrangements and/or completion criteria, especially for completion of livelihood restoration. Ensure that resettlement agreements specify that displaced persons relinquish all rights to their former houses and/or land after relocation. Prepare and facilitate briefings for displaced communities with support from the resettlement project team and, disclose livelihood restoration benefits, compensation options (monetary or in-kind), and facilitate signing of agreements. Ensure that agreements are signed by the primary beneficiary and spouse (or second relative) and witnessed by a representative from the resettlement project team and a legitimate local authority. Copies of signed agreements must be provided to the displaced households. If any other household member/s has been identified as a beneficiary of livelihood restoration, ensure agreement is tailored accordingly.</td>
<td></td>
</tr>
</tbody>
</table>
Implementation phase

- Resettlement project team
- Resettlement consultants

Preparation and delivery of monetary compensation (including payment allowances provided as part of transitional support or livelihood restoration efforts) in cases of physical displacement/relocation. Demolish former houses once these have been vacated.

Securing and maintaining land access

Ensure relevant authorities witness the handover process and reaffirm any aspects that prevent sign-off on delivery of land, replacement land/housing and/or livelihood restoration operations. Accompany displaced households during final inspection of residence or land.

Undertake progress monitoring. Execute relocation of affected households with assistance that will be provided. Liaise with project team regarding compensation grievances or external matters.

Oversee and monitor implementation progress, outcomes and interaction with vulnerable groups. Oversee and support implementation of livelihood restoration initiatives as per agreed planning in preparation of replacement land according to commitments outlined in the operationalised plan.

Commission permitting process, cadastral survey and land titling process for all replacement land. Manage facilitation and support from resettlement team and service providers (as relevant).

Facilitate land survey, permitting procedures and resources to support payment process. Ensure that scheduling does not prevent payments based on logistical capacity (facilities, transport, mode of payment), security considerations and availability of beneficiaries.

Develop a detailed schedule for compensation payment. Ensure copies of proof of payments are provided to beneficiaries and stored in digital and hard copy formats together with corresponding agreement and engagement information.

Liaise with project team regarding compensation schedule to ensure availability of funds and observation of delivery process. Ensure that the process for replacement land required for livelihood restoration, in-kind compensation and/or replacement housing. Fully brief representatives involved during negotiation and agreement to terms of what was agreed in terms of housing and livelihood restoration.

Monitor the process, preferably using personnel and community representatives involved during negotiation and agreement to terms of what was agreed in terms of housing and livelihood restoration.

In cases of physical displacement/relocation, demolish former houses once these have been vacated.

Once land access is attained, develop and implement measures to maintain and manage access as required.

Provide transitional support to households to assist with relocation and re-establishment at new conditions. Ensure relevant authorities witness the handover process and reaffirm any aspects that prevent sign-off on delivery of land, replacement land/housing and/or livelihood restoration operations. Accompany displaced households during final inspection of residence or land.

Relocate displaced households in a timely manner with minimal disruption to family, livelihood and education. Provide adequate notification to regular visits to resettlement sites.

Commission and Appoint contractors to: construct replacement housing, demolish currently occupied houses after relocation, and/or construct and/or livelihood restoration, required for replacement housing and construction of replacement infrastructure. Particular attention should be paid to infrastructure required for housing and construction of replacement and/or livelihood restoration, required for replacement housing and construction of replacement and/or livelihood restoration, required for replacement housing and construction of replacement infrastructure. Particular attention should be paid to infrastructure required for housing and construction of replacement and/or livelihood restoration, required for replacement housing and construction of replacement infrastructure.

Ensure relevant authorities witness the handover process and reaffirm any aspects that prevent sign-off on delivery of land, replacement land/housing and/or livelihood restoration operations. Accompany displaced households during final inspection of residence or land.
### Implementation phase

Resettlement project team

Resettlement consultants

| Draft legal process to deal with illegal land uses, especially illegal settlement. Communicate implications of illegal land use and process that would be followed to manage illegal land users. |

### Monitoring and Evaluation

#### Table 4F. 12 Example

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Indicator</th>
<th>Source of data required for measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity/outcome indicators</td>
<td>Cost of resettlement activities</td>
<td>Distribution of spending on items such as consultation and engagement, planning and surveys, monetary compensation, resettlement site development and construction of replacement housing, livelihood restoration, support to vulnerable groups, grievance management, general implementation services and overheads</td>
</tr>
<tr>
<td></td>
<td>Entitlement delivery, in terms of number of:</td>
<td>Full-time and part-time staff and consultants dedicated to resettlement and compensation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Human Resources</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Vehicles, computers, GPS units, and other equipment as applicable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Count</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Affected households and/or people by categories (if there are changes from the initial/LRP)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Census and grievance management records</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Individual compensation agreements signed in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Data management system</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dwellings: construction commenced in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construction</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dwellings: completed and delivered in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construction</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Dwellings: allocated to households in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Data management system</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Households moved into their new dwelling in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Data management system</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Households and/or people who have received monetary compensation in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Data management system</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Resettled houses connected to utilities (power, water, sanitation)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construction team</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Community facilities built</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Construction team</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Households and/or people that received livelihood restoration–related training in the period</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Data management system</td>
</tr>
</tbody>
</table>

#### Impact indicators

<table>
<thead>
<tr>
<th>Grievances</th>
<th>Average time for grievance processing</th>
<th>Grievance log</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number of open grievances at the end of each quarter and trends over time</td>
<td>Grievance log</td>
</tr>
<tr>
<td></td>
<td>Number of grievances opened in the period and trends over time</td>
<td>Grievance log</td>
</tr>
<tr>
<td></td>
<td>Categories of grievances and trends over time</td>
<td>Grievance log</td>
</tr>
<tr>
<td></td>
<td>Gender and potential vulnerabilities of aggrieved individuals</td>
<td>Grievance log</td>
</tr>
<tr>
<td></td>
<td>Location(s) of persons logging largest numbers of grievances</td>
<td>Grievance log</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Compensation</th>
<th>Average time for payment of compensation (time between signing of compensation agreements and payment of compensation)</th>
<th>Compensation records</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Has compensation been paid at full replacement cost? Is compensation updated to take account of value increases in real estate or crops?</td>
<td>Compensation records, with possible market research to establish current asset values</td>
</tr>
</tbody>
</table>

#### KPIs

<table>
<thead>
<tr>
<th>RAP</th>
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<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Aspect Indicator</td>
</tr>
<tr>
<td>------------------</td>
</tr>
<tr>
<td>Use of compensation</td>
</tr>
<tr>
<td>Resettlement/Relocation</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Sanitation and waste management</td>
</tr>
<tr>
<td>Allocation of dwellings and post-resettlement movements and transactions (e.g. whether replacement houses are being rented out instead of occupied by relocated households)</td>
</tr>
<tr>
<td>Livelihood restoration</td>
</tr>
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</table>

**4F. Guidance note 1 – Management of displacement impacts as part of a government-led resettlement process**

In cases where the process for land access and displacement management is determined by the host Government and this process does not align with the requirements, a Supplemental Resettlement Plan is required. This plan can either be implemented in parallel with the government-led process or thereafter. Government-led land access processes usually deviate from what is required in terms of consultation, entitlements, opportunity to reach negotiated settlement, eligibility, economic displacement, vulnerability, etc. It is challenging to address these inconsistencies entirely through supplementary planning. Consequently, the resettlement project team must engage authorities as early in the process as possible to determine which gaps can potentially be addressed through refinement of the planned government process or concurrent displacement management by the resettlement project team, and to agree on what supplementary actions will be required. The government relations team should advise on this engagement and the outcome should ideally be formalised in a legal agreement with the host government. In cases where land access is government-led, this must be identified in (Task 2), and the land access and displacement strategy (Task 1) and the displacement framework (Task 3) must be developed accordingly. It is critical to proactively determine the deviations of the government process from requirements, especially in terms of consultation, entitlements, opportunity to reach negotiated settlement, eligibility, economic displacement, vulnerability, etc.
4F. Guidance note 2 – Process for legal eviction

The process for legal eviction must be developed in consultation with relevant authorities as it is often a government-led process. Depending on the context, the resettlement project team may choose to disclose the process as part of planning documentation to ensure prior and informed awareness of due process.

The legal eviction process varies across jurisdictions. As a minimum, however, it must establish negotiation efforts (in addition to management planning engagement efforts) and assistance to be provided to households prior to considering and/or initiation of the legal eviction process. Accordingly, the process must distinguish between preparatory engagement, planning and implementation protocols, and post-eviction support.

The following preparatory steps must be completed prior to initiating lawful eviction:

- Undertake engagement to achieve in-depth understanding of issues preventing negotiated settlement. This engagement must build on engagements already undertaken during displacement management planning. Although preparatory engagement will likely be the affected households' last opportunity to avoid eviction, the resettlement project team must ensure that this is not used to coerce the households into a settlement.
- Demonstrate that reasonable settlement compromises have been made where possible or alternatively why compromises were not possible. The outcome of the negotiation process must be clearly communicated to affected households and other relevant stakeholders.
- Considering that adequate engagement opportunities have been provided to affected households during displacement management planning and that additional negotiation could have significant timing and land access implications, the resettlement project team must ensure that the process is guided by a detailed engagement timeframe providing opportunity for three to five meetings and enough time for the individuals to access and benefit from legal and/or mediation assistance.
- Initial engagements must aim to develop a clear understanding of the scenario and to inform affected parties of their options to consult reputable and independent arbitration and/or mediation services. This is important to ensure that affected parties can effectively participate in the negotiation process and that they are fully aware of alternative mediation and legal options and implications.
- The preparatory engagement phase must conclude with successful negotiation or rejection of the proposed settlement. Irrespective of the outcome, the resettlement project team must ensure that engagement efforts and the final decision of affected parties are formally recorded and disclosed to the relevant regulatory authorities.

If affected households reject the settlement agreement, legal eviction can be considered. The resettlement project team must engage internal stakeholders to demonstrate that all alternative options have been exhausted and confirm support for the decision to proceed with legal eviction. The decision must be documented together with detailed records of the engagement process to date, as well as evidence that alternative options have been exhausted.

The resettlement project team, with adequate legal expertise, must ensure that the eviction process complies with national legislative requirements. Relevant authorities must be engaged to confirm the process.
Once an eviction has taken place, post-eviction support must be provided. Evicted households remain entitled to their eligibility, compensation, inclusion in livelihood restoration programmes and.

The resettlement project team must thus ensure that all appropriate entitlements are offered to evicted households, especially in terms of transitional support, accommodation, and assistance to vulnerable households.

The process must consider potential impacts on human rights and vulnerable groups, including adherence to international norms and Anglo American’s own human rights commitments, and include measures to prevent, minimise and mitigate such impacts.

In consultation with authorities, agree on the date of eviction and any security measures that may be required. Consideration must be given to refining the process to mitigate identified risks and impacts and the provision of supplementary support by the company to minimise and mitigate potential impacts.

Provide support to authorities to ensure timely and repeated notification to affected households about the date and process of the eviction. Notification must be provided well in advance and in a manner that ensures households fully understand the process, and are aware of post-eviction accommodation and assistance that will be provided.

In most instances, the eviction process must be implemented by government authorities with support of public security forces. It will be important to brief and, if required, train security personnel on human rights requirements (see Section 4E).

Relevant authorities, and ideally also representatives from civil society, must be invited to observe the process to maximise transparency and ensure that no disproportionate force is used.
Site-Induced Migration (SIM) is defined as the movement of people into or out of an area in anticipation of, or in response to, real or perceived opportunities associated with a site. People moving into the area (i.e. in-migrants) look to benefit in terms of (direct and indirect) employment, community development initiatives and other site activities, including resettlement. People moving out of the area (i.e. out-migrants) typically do so in response to site closure or care and maintenance.

SIM can significantly change the site's external context. Many of these changes can be positive, if managed effectively by all relevant internal and external stakeholders. Potential benefits from in-migration may include economic growth, public and private investments in local services and products, the development of small and medium enterprises, increased government revenue, skill transfers and cultural exchange and refinement.

IFC Performance Standards

SIM is not covered separately in the International Finance Corporation's (IFC) Environmental and Social Performance Standards (IFC PS).

However, it is relevant to a number of the Performance Standards, most notably Assessment and Management of Environmental and Social Risks and Impacts (PS 1), Labour and Working Conditions (PS 2), Community Health, Safety and Security (PS 4), Land Acquisition and Involuntary Resettlement (PS 5), Indigenous Peoples (PS 7) and Cultural Heritage (PS 8).

Additionally, the IFC provides good practice guidance on anticipating and managing SIM:

Projects and People: A Handbook for Addressing Project-Induced In-Migration.

However, if left unmitigated, may contribute to significant negative social and environmental impacts. This ultimately can lead to an unstable operating context, affecting operational cost, schedule and reputation.
related direct and indirect impacts on communities are attributable to a site's presence and activities (see Section 3C). Sites therefore have a responsibility to help prevent and manage -related impacts on external stakeholders. However, a site cannot and is not responsible for managing alone. Strong partnerships and coordination, particularly with local authorities, are critical in managing.

is especially relevant at certain stages of the asset lifecycle, such as construction and site expansion. Specifically, this section:

Intended users
Planning for is the responsibility of site management. The intended users of this section are therefore the mine site, relevant department heads and members of the . The impacts of are mostly experienced by local communities. Social performance should therefore play a coordinating role in assessing the potential impacts of and identifying mitigation measures to minimise adverse impacts and maximise positive ones.

results from the real or perceived opportunities afforded by the presence of a large asset and is influenced by a variety of factors, including the site's scale and design, the political and socio-economic environment and host country laws and regulations. Functions like projects, engineering, security, human resources, supply chain, and safety, health and environment are essential in managing.

Relevance to other sections
Planning for and management of involves several of the guidance sections in the Social Way.

explains what is details typical potential impacts, risks and opportunities associated with provides guidance on mitigating potential -related adverse impacts and risks lists the cross-departmental roles and responsibilities involved in managing outlines the external stakeholders responsible for management of .

Governance (Section 1): Social Performance Management Committee (SPMC) – management and planning requires the involvement of multiple departments. The provides the platform to ensure that all relevant functions are engaged.

Review and Planning (Section 2) – sites are required to review and update their baseline data and context review. This information is invaluable in anticipating and assessing -related impacts and trends.

Engagement and Assessment (Section 3) -related direct and indirect impacts on communities are attributable to a site's presence and activities (see ... is invaluable in anticipating and assessing -related impacts and trends.
Stakeholder Engagement

- Regular consultations with local communities, government authorities, and infrastructure providers ensure that related impacts and concerns are properly understood. Migrants should be included in stakeholder mapping and engagement activities.

Incident and Grievance Management

- The grievance process provides an additional tool for tracking related complaints. Migrants should be able to access the grievance process.

Social and Human Rights Risk Analysis (SHIRA)

- Potential related impacts should be assessed in.

Impact and Risk Prevention and Management (Section 4)

- The opportunities afforded by should inform Plans. At the same time, potential adverse impacts can have a direct influence on Anglo American's ability to meet its Sustainable Mining Plan commitments.
About SIM

Types of in-migrants

Typically, in-migrants are attracted to areas where mine sites are located due to real and perceived direct and indirect economic and employment opportunities. The IFC indicates that in general, a multiplier effect of three to four in-migrants per site worker is not uncommon in emerging markets (no estimates for out-migrants is available).

Mine sites commonly attract labourers, entrepreneurs, artisanal miners, informal service suppliers, and small-scale traders. In-migrants can be foreigners, nationals, from the same province, and even from the same area as the local population. There is no set definition for 'local' or for an in-migrant. Definitions are context-specific and evolve over time.

There are several types of in-migrants typically associated with mine sites. Table 4G.1 provides an overview of the types of in-migration commonly experienced at mine sites.

<table>
<thead>
<tr>
<th>TYPE</th>
<th>MOTIVATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-local direct site employees and their families</td>
<td>Permanent/long-term workers directly employed by the site who move to the area, sometimes with family. Recruitment of large numbers of outside workers is typically required to build, operate, and manage a site due to lack of supply and/or capacity of local labour pools.</td>
</tr>
<tr>
<td>Non-local contract workers working on behalf of the site, and their families</td>
<td>Permanent/long-term workers employed by contractors working on the site's behalf who move to the area, sometimes with family. Recruitment of large numbers of outside contractor workers is typically required to build, operate, and manage a site due to lack of supply and/or capacity of local labour pools.</td>
</tr>
<tr>
<td>Local service providers</td>
<td>SMEs from the formal sector with, or aiming to secure, contracts to provide goods and services to the site and its contractors.</td>
</tr>
<tr>
<td>Opportunistic migrants, job-seekers</td>
<td>Unskilled or skilled non-local in-migrants, seeking direct or indirect employment or entrepreneurial opportunities. Often skilled, experienced and mobile workers who travel from site to site in search of work. These are typically men.</td>
</tr>
</tbody>
</table>
Formal and informal potential providers of goods and services to the local population

Traders, entrepreneurs, small and medium enterprise owners, commercial sex workers, etc., from the formal and informal sectors, aiming to increase disposable income through provision of goods and services. New business opportunities can consist of hotels, guest-houses, restaurants, bars, etc.

Returning family, extended family members, and former residents of the area

Returnees attracted by the increase in (real or perceived) opportunities back home.

ASM and others seeking to exploit natural resources

Opportunists seeking to take advantage of increased accessibility and availability of resources through artisanal and small-scale mining.

Other opportunistic in-migrants

Sometimes in-migrants are attracted to expectations of compensation, improved infrastructure, SED projects, or other benefits offered by the site.

Potential benefits and adverse impacts from SIM

The potential economic benefits of SIM are substantial. The arrival of hundreds, sometimes thousands, of new people can act as a stimulus to local economies, sustaining existing businesses and creating new opportunities. Most obviously, land owners, hotels, shops, restaurants, bars and street traders all stand to gain.

Potential benefits of SIM include:

- Increased local skills base, wider labour pool, and employment creation as well as improved local training and skills development opportunities.
- Opening of new markets for local products and services and increased accessibility and availability of goods and services.
- Business development and alternative livelihood opportunities.
- Improved local wage and income levels.
- An increase in local tax revenue levels and therefore, in theory, improved public services and infrastructure.
- Increased political prominence and influence of the area.

Potential adverse impacts of SIM include:

- Competition for jobs, for markets, for housing and for resources.
- Local inflation.
- Tensions between local communities and in-migrants, particularly where the groups have distinctive cultures and lifestyles.
- Shortage in housing, water, electricity, education, and health services due to an increase in demand.
- Overuse of and damage to biodiversity, forests, and other natural resources.
- An increase in inequality, as SIM can amplify the gap between those who are benefitting from opportunities and those who aren't.
Lifecycle planning

Across the lifecycle of the asset, consideration needs to be given to how potential SIM-related impacts and risks can be prevented, mitigated, managed, and monitored.

In project development, when strategic decisions are being made in terms of land acquisition, local staffing and recruitment, and infrastructure, sites should plan to prevent and mitigate potential negative SIM impacts. Most SIM tends to occur in the construction phase, when site employment levels are at their peak. Once construction is completed, some in-migrants move out of the area while others stay.

Planning for closure – or social transition - should consider the reverse dynamic. As site employment opportunities dry up, large numbers of people may leave the local area.

Box 4G.2 provides a snapshot of when and how SIM relates to the different phases of an asset’s lifecycle. Note that the timing, level and nature of SIM can vary from site to site. In some cases, SIM may build up over the life of asset, in others it can happen quickly.

An increase in shanty towns or squatter settlements, often with poor hygiene and sanitation.

The introduction of new diseases and an increase in the spread of disease, for example in areas with poor hygiene and sanitation.

An increase in prostitution, gambling and crime as in-migrants are typically young men.

Impacts on local power structures and decision-making approaches.

Potential for out-migration when operations cease should be assessed during operations and considered in social transition planning. If there is a local town highly dependent on the site the assessment should establish, in consultation with stakeholders, the viability of that town post-mining. For example, a town is less likely to be viable post-mining if there is no other significant employer in the area, few opportunities for local businesses, and insufficient users to sustain local infrastructure and services due to predicted population decline. The outcomes of the assessment should be considered when defining social transition success criteria and post-mining land use options (see Tool 1 of the MCT). Actions required to address potential impacts related to out-migration at social transition should be detailed in the relevant operational management plans (e.g. Site-Induced Migration Management Plan, SMP and SED Plans) and integrated into the Mine Closure Plan to the appropriate level of detail depending on years remaining to closure.
Anglo American’s Social Way follows the Plan Do Check Act (PDCA) management process. The guidance in this sub-section is structured accordingly. For the purposes of this section, encompasses the process of assessing the need for an in-depth assessment, conducting the assessment, developing a management plan, and monitoring.

1. Review context
2. Review comparable experiences
3. Analyse historical migration and population movements
4. Analyse present migration and population movements
5. Identify hotspots
6. Forecast site-induced migration (SIM)
7. Conduct stakeholder engagement
8. Update SHIRA
9. Develop SIM Management Plan
10. Adjust
11. Report
CHECK

10. Monitor and evaluate
The PLAN phase focuses on gathering information to more accurately assess potential social and human rights impacts and risks related to and develop a Management Plan.

Task 1 - Review context

Sites should review the information collected as part of the internal and external context review (Section 2) as a basis for assessing potential-related social and human rights impacts and risks (see 4G.2 Task 8). Information that is particularly useful for includes:

- Crime rates and the nature of crime.
- Availability, accessibility, and capacity of health, education, water, energy, waste management, law enforcement, and other public services and infrastructure.
- Government spatial planning, land use and development plans.
- Current land use, land availability, and the location of settlements.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

- Plan
Section 1 provides more detail on the use of consultants in social performance.
Task 3 – Analyse historic migration and population movements

Contents in this section:

Task 1 – Review context
Task 2 – Review comparable experiences
Task 3 – Analyse historic migration and population movements
Task 4 – Analyse present migration and population movements
Task 5 – Identify hotspots
Task 6 - Forecast site-induced migration
Task 7 - Conduct stakeholder engagement

Historic migration and population movements in the area of influence can provide valuable insights into current and future in- and out-migration and population movements. Sites should look at the following:

- What were the most common types of (in and out) migrants?
- Where did they come from?
- Where were they going and why?
- Where did they settle and why?
- What were their main means of transportation and why?
- Where were the main official and unofficial/illegal trading points and routes?
- How have historic migration and population movements shaped local settlements, culture and ethnic diversity?
- What other impacts did historic migration and population movement have?

What does the population growth over time look like in the area of influence?
Task 4 – Analyse present migration and population movements

Contents in this section:
Task 1 – Review context
Task 2 – Review comparable experiences
Task 3 – Analyse historic migration and population movements
Task 4 – Analyse present migration and population movements
Task 5 – Identify hotspots
Task 6 – Forecast site-induced migration
Task 7 – Conduct stakeholder engagement

Current migration and population movements provide valuable insights into future in- and out-migration and population movements. Sites should look at the following:

What are the most common types of (in and out) migrants?  
Where do they come from?  
Where are they going and why?  
Where do they settle and why?  
What is their main transportation method and why?  
Where are the main official and unofficial/illegal trading points and routes?  
How does in- and out-migration shape local settlements, culture and ethnic diversity?  
What other impacts does in- and out-migration and population movement have?
Based on the experience from other comparable sites or projects, history and current population movements and growth, the location of other current and planned sites or companies in the area, and stakeholder feedback, sites should assess where in the area of influence in-migrants are most likely to settle, or where out-migrants are most likely to settle. Where is already occurring and ongoing, sites should identify where in-migrants or out-migrants have settled.

In general, in-migrants typically settle:

- The establishment of small trade stalls and shops can also be expected near site fences and along access or main roads.
- As close to the site’s fence or entry point as practically possible, as this may be perceived to increase the chance of site employment.
- Along the site’s access road or the main road leading up to the site, as this may be perceived to increase opportunities for small trade due to the volume of passing traffic.
- In the nearest serviced settlement (i.e. with a good level of public services and infrastructure), as this is likely where most indirect employment opportunities arise.
- Near site recruitment or training centres, as this may be perceived to increase the chance of site employment.

These locations can also translate into population movements within the area of influence, for example where a site’s or sites’ location is concentrated in one area this may lead to a decrease in population in other areas in the area of influence as people move nearer to the site.
Sites should forecast population growth over time, incorporating the estimated number of in- or out-migrants. By forecasting over time, sites have a better understanding of when estimated peak is likely to occur and what the size of the population within the area of influence (and for the identified hotspots in particular) may look like over time. Population density figures over time can also be a useful indicator.

Where is already occurring and ongoing, sites should estimate actual population growth and (approximate) number of in- or out-migrants and use this information to forecast over the life of the asset.

Forecasting population growth should be based on:
- Current population numbers by community.
- The natural population growth rate, as this is likely to remain constant over time.
- An estimated multiplier effect of the ratio of in-migrants per on-site worker (see Box 4G.4). This requires information about site employment over the Life of Asset.
- Assumptions as to where in-migrants may settle based on the hotspots identified. For example, 75% of in-migrants may be likely to settle in the serviced settlement nearest to the site, 20% of in-migrants may be expected to settle in the capital of the region in which the site is located, and 5% of in-migrants may be likely to settle along the site's access road. For out-migration this includes assumptions on where out-migrants are most likely to settle based on the hotspots identified.
Information about the number of site employees over time.

Assumptions about the number of employees at other sites or companies in the area of influence, which may also contribute to in- or out-migration.

Forecasting population growth should include:

- A low-scenario, typically based on an estimated multiplier effect of 1 in-migrant per site worker.
- A high-scenario, typically based on an estimated multiplier effect of 4 or more in-migrants per site worker.

Official census data and other information such as satellite imagery can be used to develop population growth estimates.

The estimated size of the multiplier effect should be informed by comparable experiences, site accessibility, and socio-economic context. The size of the multiplier effect cannot be perfectly forecasted, nor can a site fully control the size of the multiplier effect.

The multiplier does not suggest that a site worker actually brings or takes in-migrants with him/her. Rather, the multiplier reflects the assumption that for every direct site job, several (real or perceived) indirect jobs and business opportunities are created (or are expected to be created) as a result of increased economic activity. These indirect jobs and business opportunities (whether real or perceived) attract in-migrants hoping to benefit.

Box 4G.4 SIM scenarios
Task 7 - Conduct stakeholder engagement

Engagement with relevant stakeholders such as potentially affected communities, local government departments, and other mine sites or large infrastructure developments in the Area of Influence provides a clearer understanding of the potential and actual SIM-related impacts and risks, and how they may be prevented, mitigated, managed, and monitored. Stakeholder engagement should also be conducted for Task 2, 3, 4 and 5.

Impact is not always dictated by numbers. Sites in relatively isolated areas may not see significant in numbers, but local communities may experience significant impacts, while sites located close to urban centres may attract high numbers of but find that in-migrants are easily absorbed. The level of vulnerability to is also best understood through discussions with affected stakeholders.

Definitions and attitudes towards in-migrants are context-specific and evolve over time. Through stakeholder engagement, sites should aim to better understand how local communities define and perceive in-migration. Section 3A provides detailed guidance on consulting with affected communities and other relevant parties. Consultations around should be anticipated and factored into Stakeholder Engagement Plans (SEP).

Table 4G.2 below provides an overview of the most important stakeholders.

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Engagement focus</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affected communities</td>
<td>SIM</td>
</tr>
<tr>
<td>Insiders</td>
<td>SIM</td>
</tr>
<tr>
<td>Others</td>
<td>SIM</td>
</tr>
<tr>
<td>Total</td>
<td>SIM</td>
</tr>
</tbody>
</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
While sites typically need to take the lead in raising awareness of the potential impacts of in-migration with external stakeholders, impacts cannot be managed by sites alone. Local communities and local, regional, and national governments all share responsibility for ensuring that SIM is effectively planned for and managed.

The CEF provides a vehicle for coordination at the community level. Where potential impacts are significant, sites should consider setting up a multi-stakeholder coordination group specifically focused on SIM and that involves the relevant authorities.

How do local populations feel about the prospect of in-migrants? What are they be most concerned about? How do they feel they might benefit? What would be required to address their concerns?

Monitoring the scale and impacts of SIM:

- **Motivations for in-migration and out-migration**
- **Challenges (or not) of integrating with local communities**
- **Local authorities, including police, public health and spatial planning agencies, can provide an assessment of local capacity to manage and plan for in-migration**
- **Local authorities will be key partners in identifying measures to discourage** SIM (if necessary)
- They also need to be involved in planning for the public service and infrastructure requirements that might be needed as a result of SIM
- **Monitoring the scale, location, and impacts of SIM**
- **NGOs**: Source of information (and potential partners) in terms of tracking and monitoring indicators such as population growth, health statistics and inflation
- **Insights into the impacts of SIM on local populations, including any warning signs of increasing tension**
- **National and regional governments have a role to play in either limiting or encouraging** through transport corridors, tax incentives, funding for infrastructure and public services etc
- **National or regional development plans present wider economic development opportunities which can diversify in-migration away from the site**
- **Provide information about their own experience with SIM**
- **Collaboration in terms of preventing and managing SIM**
- **Speaking with a collective voice can be important in lobbying local, regional or national authorities**
- **Identify and address any cumulative impacts**
Task 8 – Update SHIRA

Task 9 – Develop SIM Management Plan

This section is focused on updating and developing a Management Plan.

Task 8 – Update

Based on the results of Task 1, 2, 3, 4, 5 and 6 and the internal and external context review (see Section 2), sites should assess -related impacts and risks. As part of this, prevention and mitigation measures should be identified. In accordance with the mitigation hierarchy, there are two types of prevention and mitigation measures: those aimed at preventing or minimising the scale of, and those aimed at preventing or mitigating potential impacts caused by. Table 4G.4 provides examples of the former, Table 4G.5 of the latter.

Prevention and mitigation requires the involvement of multiple functions. The Social Performance Management Committee (SPMC) (see Section 1) and the ORM process are vehicles for ensuring coordination. Examples of cross-functional responsibilities are included in Tables 4 and 5.

Several mitigation measures likely consist of long-term interventions. These should be incorporated into (see Section 4A).

Interventions can be used to mitigate potential adverse impacts and maximise opportunities.

The development and implementation of mitigation measures also involves external stakeholders (see Task 11).

Impact and risk prevention and management.

Box 4G.5 Potential impacts on in-migrants

Assessments typically focus on impacts on existing local communities and less on the in-migrants. However, once in-migrants have moved within the site's Area of Influence (see Section 2), they become potentially affected stakeholders themselves.

**Box 4G.5 Potential impacts on in-migrants**
Vulnerability is a factor in determining the consequence level of potential impacts. In relation to, the potential adverse impacts of in-migration on women, children and groups such as the elderly or disabled can be especially severe, for example:

- The safety and security of women and children can be threatened by the arrival of in-migrants (typically young men). Even when there is no physical threat, the presence of significant numbers of outsiders can undermine communities' sense of security. The potential proliferation of bars and accompanying increase in gambling and prostitution can reinforce this sense of insecurity and discourage women, children and the elderly from walking freely in towns. Potential issues include:
  - Young women could be at risk of harassment or being drawn into prostitution out of economic necessity
  - In-migrants may have a low social status or be resented amongst local communities or public officials.
  - Pressure on public services (health, education) has a disproportionate impact on vulnerable groups
  - The poorest in a community will suffer the most from any-related inflation in the price of basic goods and services.

### Table 4G.3 Example of potential impacts and risks

<table>
<thead>
<tr>
<th>Impact Category</th>
<th>Potential impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic</td>
<td>Increase in competition for economic resources and employment</td>
</tr>
<tr>
<td>Personal and political security</td>
<td>Disruption to traditional livelihoods</td>
</tr>
<tr>
<td>Socio-cultural networks</td>
<td>Recruitment of newly-arrived in-migrants instead of local residents can lead to tension. This is equally true of contractors and in relation to local procurement.</td>
</tr>
<tr>
<td>Infrastructure and services</td>
<td>Over-exploitation of natural resources, environmental degradation or land speculation. In case of closure or care and maintenance, an outflow of people may lead to a decrease in economic growth rates</td>
</tr>
<tr>
<td></td>
<td>Inappropriate, illegal or criminal behaviour by workers or contractors in communities</td>
</tr>
<tr>
<td></td>
<td>Theft, violence, trespassing, illegal land occupation</td>
</tr>
<tr>
<td></td>
<td>Migrants themselves can become victims of crime or harassment and may be targeted by local communities or by security forces</td>
</tr>
<tr>
<td></td>
<td>Conflict between local communities and migrants</td>
</tr>
<tr>
<td></td>
<td>Disruption to traditional leadership</td>
</tr>
<tr>
<td></td>
<td>Breakdown or erosion of traditional customs, values, and norms</td>
</tr>
<tr>
<td></td>
<td>Loss of local identity</td>
</tr>
<tr>
<td></td>
<td>Increase in inequalities within communities</td>
</tr>
<tr>
<td></td>
<td>Inadequate capacity of public services and infrastructure to manage an increase in demand as a result of increased population</td>
</tr>
<tr>
<td></td>
<td>Development of shantytowns / informal settlements and squatter areas</td>
</tr>
</tbody>
</table>

As'k M k
Impact Category

- Potential impact

Risks category

- Reputation
- Safety
- Financial

TABLE 4G.4 Example of controls to prevent and minimise the scale of

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples of Prevention Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner</td>
<td>Site accessibility. Site access roads and transport corridors can unintentionally facilitate in-migration, either by making it easier to reach the site or by opening up access to nearby areas that were previously inaccessible. Buffer zones around the site can discourage squatters or. The design and location of access roads and transport corridors should consider.</td>
</tr>
<tr>
<td>Mine</td>
<td>Planning recruitment and training procedures, including those of contractors, should be designed to discourage. A clear definition of who is considered 'local' and an approach for how the site prioritises local workers (where allowed) should be developed and widely disseminated. Recruitment at the site gate should not be possible as it encourages job-seekers to settle near the site. Job-seekers should be able to apply for jobs remotely, i.e. online or at recruitment centres away from the mine site.</td>
</tr>
<tr>
<td>Human</td>
<td>Resources procurement procedures, including those of contractors, should be designed to discourage. A clear definition of who is considered 'local' and an approach for how the site prioritises local contractors should be developed and widely disseminated. Companies should be able to register their business on the site's register of qualifying enterprises remotely.</td>
</tr>
<tr>
<td>Supply</td>
<td>Chain worker accommodation. Workers from outside of the community are often housed in camps. Closed camps with good facilities, entertainment and services limit the need for workers to go to nearby villages to buy goods and services and seek entertainment. Sites should consider prohibiting workers from buying goods and services offered at the worker accommodation gate.</td>
</tr>
<tr>
<td>Worker</td>
<td>Provision transportation to and from site for workers from their point of origin may discourage worker to move close to the site.</td>
</tr>
<tr>
<td>In case of closure or care and maintenance, an outflow of people may lead to an increase in access to infrastructure and services for the local population.</td>
<td></td>
</tr>
<tr>
<td>Damage to graves or occupation of cemeteries for land</td>
<td></td>
</tr>
<tr>
<td>Damage to cultural heritage sites</td>
<td></td>
</tr>
<tr>
<td>Poor sanitation at informal settlements encourages spread of disease</td>
<td></td>
</tr>
<tr>
<td>Increased risk of fire and uncontrolled spread of fire in informal settlements</td>
<td></td>
</tr>
<tr>
<td>Higher levels of pollution, noise and traffic can impact on community health</td>
<td></td>
</tr>
<tr>
<td>Introduction of new diseases to local communities</td>
<td></td>
</tr>
<tr>
<td>Increase in HIV/AIDS and other STIs due to increase in prostitution</td>
<td></td>
</tr>
<tr>
<td>New roads and more vehicles increase the risk of accidents.</td>
<td></td>
</tr>
<tr>
<td>Resentment towards site, perceptions of unfair treatment of locals</td>
<td></td>
</tr>
<tr>
<td>Sustainable Mining Plan health and education targets undermined</td>
<td></td>
</tr>
<tr>
<td>The behaviour of permanent and contract workers in local communities can have a strong influence on perceptions of the site</td>
<td></td>
</tr>
<tr>
<td>Spread of disease affects site workers</td>
<td></td>
</tr>
<tr>
<td>Pressure on site to support health provision and other services and infrastructure</td>
<td></td>
</tr>
</tbody>
</table>

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The above measures (accessibility, recruitment procedures, procurement procedures, worker accommodation, worker transportation) should be agreed and implemented by contractors working on the site's behalf.

The scale of can be managed by supporting long-term, collaborative regional development activities. Economic growth in the wider region can reduce dependency on the site as a potential source of direct or indirect income and diversify in-migration away from the site.

Where projects are concentrated in one particular community or area, this may attract. Diversifying projects throughout the area of influence may prevent in-migrants to settle in one particular area.

Support efforts to formalise local land ownership and local land rights (legal and customary) (see Section 4F).

Work with local authorities and communities to develop a spatial planning approach.

Codes of conduct for workers.

Limit interaction with communities, i.e. worker camp not located in communities, closed worker camp, designated stop areas for drivers, etc.

Limit interaction with communities (as above) for workers from outside the local area

Encourage dialogue between communities and in-migrants

Prepare communities for impacts of SIM projects to community build trust and cohesion, building resilience of communities.

Provide accommodation and services for workers from outside the local area

Projects focused on health (see Section 4C)

Work with local authorities to improve health service provision (see Section 4C)

Measures to limit access to cultural heritage sites

Awareness-raising programmes for in-migrants

Health and sanitation awareness-raising programmes (see Section 4C)

Support to provision of better water and sanitation (see Section 4C)

Work with local authorities to improve spatial planning

Measures to limit access to cultural heritage sites

Awareness-raising programmes for in-migrants

Health and sanitation awareness-raising programmes (see Section 4C)

Support to provision of better water and sanitation (see Section 4C)

Work with local authorities to improve spatial planning

Measures to limit access to cultural heritage sites

Awareness-raising programmes for in-migrants

Health and sanitation awareness-raising programmes (see Section 4C)

Support to provision of better water and sanitation (see Section 4C)

Work with local authorities to improve spatial planning

Measures to limit access to cultural heritage sites

Awareness-raising programmes for in-migrants

Health and sanitation awareness-raising programmes (see Section 4C)

Support to provision of better water and sanitation (see Section 4C)

Work with local authorities to improve spatial planning
Where potential and/or actual SIM-related impacts and risks are significant, sites should develop a Management Plan. A stand-alone Management Plan ensures continued focus on and allows for an overview of a comprehensive approach to managing and monitoring its scale and impacts. An outline of a Management Plan is provided in Tools.

Key SIM-related impacts and risks should be included in the SMP. Sites may choose to include the Management Plan as an Annex to the SMP.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT
A monitoring and evaluation framework should be developed to track the scale of 
extremism, its impacts, and the effectiveness of mitigation measures.

To monitor the scale of extremism, its hotspots and impacts, sites should develop key indicators, drawing on observation, statistics, satellite imagery, and community consultations. Tracking these indicators and trends at an appropriate frequency allows sites to adjust controls as needed and allow for remodelling (see Section 4G.2 Task 6).

As part of implementation, the implementation of extremism-related Controls should be monitored and their effectiveness should be evaluated so that corrective action can be taken where needed. An example is provided in Table 4G.6.

Long-term objectives identified as part of Review and Planning (see Section 2) may also relate to extremism, in which case a monitoring and evaluation framework should also be developed to track progress against the long-term objectives.

### Table 4G.6 Example KPIs

<table>
<thead>
<tr>
<th>Potential Impact</th>
<th>Controls</th>
<th>Target</th>
<th>Control owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation check</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harassment of local women by site workers in the communities</td>
<td>Develop and enforce Code of Conduct addressing harassment in local communities</td>
<td>0 incidents related to harassment of local women by site workers</td>
<td>Human Resources</td>
<td>Start date, end date</td>
<td>Code of Conduct developed/updated</td>
<td>Code of Conduct training logs</td>
<td>Code of Conduct</td>
<td>Site workers spending more time in camp and less time in communities</td>
<td>Decrease in incidents and grievances related to harassment of local women by site workers</td>
</tr>
</tbody>
</table>

Example: Harassment of local women by site workers in the communities

Develop and enforce Code of Conduct addressing harassment in local communities

0 incidents related to harassment of local women by site workers

Human Resources

Start date, end date

Code of Conduct developed/updated

Code of Conduct training logs

Code of Conduct

Site workers spending more time in camp and less time in communities

Decrease in incidents and grievances related to harassment of local women by site workers
<table>
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<th>x</th>
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<th>x</th>
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<td></td>
</tr>
</tbody>
</table>

**Potential Impact**

Controlled Target(s) 

*Potential Outcome:*

- Site workers are more respectful towards local women.

**Inputs**

- Verification: 
  - Camp sign-in data,
  - Community feedback

**Implementation**

- Staff time
- On-boarding presentation revised
- On-boarding presentation
- On-boarding attendance logs show that workers are aware

**Outputs**

- Staff and contractor time
- Camp rules updated to reflect changes
- Improved facilities installed in camps
- Regular evenings with entertainment scheduled in camps
- Staff making use of new facilities and entertainment in camp

**Effectiveness**

- Surprise andREV

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Conduct participatory monitoring

- Participatory monitoring is not a requirement in relation to ... having, or likely to have, significant impacts. The coordination group or the can conduct or be involved in participatory monitoring. This is especially valuable given the collaborative approach required to address many ... more information about participatory monitoring is included in the Governance section (see Section 1).
The ACT phase incorporates a process of continuous improvement, based on the results of monitoring and evaluation, for the management of potential risk-related impacts and risks, as well as internal and external reporting.

Task 11 – Adjust

Monitoring helps ensure that the implementation of Controls is on track and that the Controls are having the desired effect. Modifications of Controls can be made as needed, based on monitoring and evaluation data.

For example, where indicators for monitoring the scale of and its hotspots show an unexpected rapid rise in the population of a nearby town or the overnight establishment of a small informal settlement near the site, this could trigger immediate action.
Results of monitoring and evaluating and any adjustments made to manage should be regularly reported to internal and external stakeholders through the SIM and SPMC or equivalent structures.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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Table 4G.7 lays out typical internal roles and responsibilities in managing... ideally, each site should assign one individual responsible for coordinating and managing. This individual will need to work closely with other departments at site level as well as with the to ensure a fully regional approach.

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>GROUP SOCIAL PERFORMANCE TEAM</td>
<td>Designated Coordinator</td>
<td>Coordinating role in:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Data collection</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Provides advice and input on how to meet elements of the IFC Performance Standards</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Acts as contact point with regional and national authorities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Provides guidance on relevant legislation and regulations concerning internal migration and immigration from abroad</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Coordinates planning with regional authorities (e.g. infrastructure, provision of public services)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Receives regular updates through quarterly reports</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Collates relevant baseline data</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Collates internal and external context information</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Consults external stakeholders to assess potential impacts</td>
</tr>
</tbody>
</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4G Site-Induced Migration (SIM)
Planning
Implementation
Monitoring Reporting

SITE HEADS OF DEPARTMENT
Social Performance Management Committee, especially:

General manager

Assess potential and actual impacts
Coordinates with HoDs on key impacts and prevention and mitigation measures
Engages local authorities on key impacts and prevention and mitigation measures
Develops and updates the Management Plan SIM
Confirms actions together with HoDs
Establishes multi-stakeholder working group SIM
Oversees implementation of the Management Plan SIM
Tracks extent, type and impacts of SIM
Adapts Management Plan based on monitoring results and community feedback
Provides quarterly reports of to HoDs, and GM

Supply chain
Engineering/Operations
Human resources
Security
S&SD

Supports development of Management Plan SIM
Oversees contractors
Prioritises local procurement
Adapts project design to minimise or impacts of SIM SIM
Liaises with local police on security measures and responses
Tracks health and safety issues as part of Community Health and Safety Management Plan
Tracks impacts on biodiversity, natural resources and the environment
Ensures cross-departmental coordination
Facilitates coordination with BU
Ensures delivery of Management Plan SIM

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4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4G Site-Induced Migration (SIM)

4G.4 Tools

Contents in this section:
4G.1 Introduction
4G.2 Guidance
4G.3 Management and resources
4G.4 Tools

4G Tool 1 – Sample Table of Contents for a Management Plan

<table>
<thead>
<tr>
<th>Section</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>Legal Framework</td>
</tr>
<tr>
<td></td>
<td>Internal Context</td>
</tr>
<tr>
<td></td>
<td>External Context</td>
</tr>
<tr>
<td></td>
<td>Scale and Hotspots</td>
</tr>
<tr>
<td></td>
<td>Impacts and Risks</td>
</tr>
<tr>
<td></td>
<td>Strategy, Prevention and Mitigation</td>
</tr>
<tr>
<td></td>
<td>Measures</td>
</tr>
</tbody>
</table>

SIM

Problem statement

Purpose of this document

Scope of document

An overview of legislation pertaining to in-country and cross-border migration. Consideration should also be given to other laws, including labour laws and regulations.

A description of key current and planned site activities, including demand for labour and goods and services, drawing on the internal context review.

A description of the external context, drawing on the external context review and baseline data.

Include trends in demographics, and capacity of public services and infrastructure.

Overview of actual and likely scale and hotspots. Drawn from the ‘DO-section’.

List of potential and actual impacts. Drawn from the assessment.

Description of strategy and objectives for preventing and managing, including a rationale for the selected combination of approaches and interventions.

Overview of scale prevention measures

Overview of controls to prevent impacts and risks (linked to assessment).

SHIRA

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4G Site-Induced Migration (SIM)
External Stakeholders

Internal Roles and Responsibilities

Resourcing

Monitoring and Evaluation

Overview and mapping of key external stakeholders, their roles and responsibilities in management, and engagement approach

Description of working group SIM

Overview of key internal stakeholders for managing, including coordinator SIM

Description of coordination (for example via SPMC

Human and financial resources required to implement Management Plan

Monitoring and evaluation framework for prevention and impact management controls (as per SHIRA

List indicators to be tracked to monitor scale and hotspots

Frequency of Management Plan update

Approval of Management Plan

1
4.H Cultural heritage

Contents in this section:

4.H Cultural heritage

4H.1 About cultural heritage

This section provides guidance on the management of cultural heritage. Anglo American recognises the importance of cultural heritage and of managing cultural heritage resources in a sustainable manner. The section is aligned with Performance Standard 8. Under the Social Way, every Anglo American site is required to identify, assess and manage any adverse impacts on cultural heritage. This is an ongoing requirement throughout the asset lifecycle.

Specifically, this section:

- IFC provides guidance on cultural heritage scoping to identify potential risks and impacts
- details the requirement for a Cultural Heritage Management Plan
- explains the importance of developing and raising awareness of a Chance Find Procedure (CFP)
- assists sites with the development, implementation and monitoring and evaluation of the aforementioned management measures
- describes the cross-functional co-ordination required to manage cultural heritage issues.

Performance Standard 8

"In addition to complying with applicable law on the protection of cultural heritage, including national law implementing the host country's obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage, [sites will] identify and protect cultural heritage by ensuring that internationally recognized practices for the protection, field-based study, and documentation of cultural heritage are implemented."

8 includes a requirement to:

- protect cultural heritage from the adverse impacts of project activities and support its preservation
- promote the equitable sharing of benefits from the use of cultural heritage.
Intended users

The intended users of this section are primarily social performance teams. However, the environment, management and operations teams should also have a strong working knowledge of the guidance. Additionally, all contractors and subcontractors must be aware of Anglo American's procedures relating to cultural heritage.

Relevance to other sections

Cultural heritage management is a critical issue across many Anglo American sites. It is supported by other guidance in the Social Way toolkit.

Governance

The Social Performance Management Committee (SPMC) is the primary vehicle for ensuring broad awareness of cultural heritage across different functions, including contractors, and for developing a consistent approach to identifying and managing the issue where relevant.

Review and Planning

The baseline updates and context review are an opportunity to identify potential cultural heritage issues arising from a site's impacts or from its expansion. Additionally, the rolling integration of the SMP with the Life of Asset Plan (LOAP) should strengthen sites' ability to anticipate any cultural heritage impacts.

Engagement and Analysis

Stakeholder Engagement – sites' Stakeholder Engagement Plans (SEPs) should include consultations on cultural heritage with appropriate stakeholders, including community leaders and elders, religious leaders, women's groups and other community representatives, authorities, custodians or users of cultural heritage (including those outside the vicinity of the project area), and subject-matter experts.

Incident and Grievance Management – incident and grievance management procedures are a requirement for all sites and should be in place from the earliest stages of the asset lifecycle. They provide an additional mechanism for identifying cultural heritage impacts.

Social and Human Rights Risk Analysis (SHIRA) – adverse impacts (actual and/or potential) should be tracked through sites' annual SHIRA.

Impact and Risks Prevention and Management

Socio-Economic Development (4A) – programmes can be used to promote cultural heritage, but potential unintended, indirect impacts of programmes on cultural heritage must also be assessed and managed.

Contractor Social Management (4B) – contractor activities can have a negative impact on cultural heritage and contracts should specify the controls and requirements needed to prevent or minimise these impacts. All contractors must be familiar with the site's developed plans (CFP).
Community Health and Safety  (4C) – certain cultural heritage resources and practices have a role in management of community health.

Site-Induced Migration  (4G) – site-induced migration can be a source of impacts on cultural heritage.

Land Access, Displacement and Resettlement  (4F) – land acquisition and resettlement can have significant impacts on cultural heritage.

Indigenous Peoples  (4I) – Tangible and intangible cultural heritage, as well as natural features or objects that embody cultural values are typically very important to Indigenous Peoples. Assessment and management of impacts on Indigenous Peoples' cultural heritage must align with the requirements for Free Prior and Informed Consent and development of an Indigenous Peoples Plan, as outlined in the tool on Indigenous Peoples.
Cultural heritage is considered a unique and non-renewable resource that possesses cultural, scientific, spiritual, traditional or religious value, and is frequently legally protected. More specifically, cultural heritage includes:

Cultural heritage management is essential to good community relations. It shows respect for culture and traditions. If neglected or ignored, it can become a source of conflict and trigger opposition to a site. Beyond legal obligations, Anglo-American is committed to following international standards of good practice, including where certain forms of tangible or intangible cultural heritage may not be specifically covered by host-country legislation.

Cultural heritage is not relevant in every context. Where the screening and/or other assessments (e.g. ESIA) have determined there are no impacts on cultural heritage, the site should obtain a letter from the appropriate national and local authorities (e.g. the Ministry of Culture, Heritage, Environment or Archaeology) confirming this. Note that cultural heritage may still become an issue; for example, as a result of an expansion of the site, through ongoing stakeholder engagement or through chance finds.

Impacts on cultural heritage can be direct (physical disturbance or damage to a resource that alters, positively or negatively, the resource's scientific or cultural value) or indirect (changes to a resource's physical environment or "setting" that alter its cultural value, or activities that restrict or limit stakeholder access to a resource). Impacts commonly result from:

1. **Tangible heritage**, both movable and immovable objects (e.g. properties, graves, sites, structures, or groups of structures) that have archaeological, paleontological, historical, cultural, artistic or religious value
2. **Natural features or objects** that embody cultural values, such as sacred rocks, caves, streams or waterfalls
3. **Intangible forms of culture**, that embody cultural values or are part of a living cultural tradition such as local knowledge, innovations or community practices (also known as living heritage).

**ESIA site preparation** – ground-disturbing activities (i.e. vegetation clearance, grading/levelling, and excavation) can result in damage to or complete removal/destruction of cultural-heritage resources.

**Land acquisition** – cultural heritage located on or related to the land to be acquired/used is inevitably affected.
Lifecycle planning

Impacts should be identified as early as possible in the lifecycle to minimise disruption and to allow sufficient time for adequate management measures to be developed. However, cultural heritage issues may surface at any stage. Some impacts may only become apparent during construction once land is disturbed (e.g. previously unidentified graves or archaeological resources may be discovered during site clearance). Likewise, impacts may only emerge during operations (e.g. cracking of a church or place of worship owing to blasting).

- Infrastructure – construction of roads may restrict access for users of cultural heritage or facilitate access for those outside the community (tourists, migrants, artisanal miners)

- Environmental impacts – a site's environmental impacts may damage or undermine the cultural value of a resource, most obviously when a sacred object or place is itself a natural feature (e.g. river, forest)

- Resettlement – beyond the impacts brought on by the physical access of land, relocating households can severely disrupt social customs and traditions (see Section 4F)

- Site-induced migration (SIM) – migrants attracted by the perceived economic opportunities offered by a site can have a profound effect on social customs and traditions of existing communities, whether through exploitation of natural resources, encroachment on land or undermining cultures, religious practices, languages and traditional institutions. Indigenous Peoples (see Section 4I) can be particularly vulnerable to the cultural heritage impacts of SIM

- Socio-economic development (SED) – development programmes that aim to commercialise tangible or intangible cultural heritage (e.g. increased tourism, marketing of traditional clothing, etc.) can provide valuable income but may also undermine traditions and customs.

Potential impacts on cultural heritage should be screened and assessed in the scope of the Closure Social Impact Assessment undertaken when sites are five years from planned closure.

Specific considerations in relation to cultural heritage, social transition and mine closure include:

- What will happen to cultural heritage resources currently within the mining lease and protected under the site's Cultural Heritage Management Plan (CHMP) when the site is relinquished (e.g. can ongoing access for local communities be maintained under the proposed post-mining land use)?

- Do the post-mining land-use plan and social-transition success criteria create any risks or opportunities in relation to cultural heritage?

- Has the necessary local capacity been developed for external stakeholders to take ownership of and continue programmes, initiated by site during operations, that aim to protect cultural heritage in the area and/or support communities to maximise opportunities related to cultural heritage?

Box 4H.2 Closure planning: social transition

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This section provides guidance on how to manage cultural heritage using the Plan Do Check Act (PDCA) management technique adopted across the Anglo American Social Way. The iterative process lends itself to continuous improvement in the way cultural heritage is managed. Key tasks during each stage are shown in Figure 4H.1 and discussed in the sub-sections below.
FIGURE 4H.1 The PDCA cycle as relevant to cultural heritage
Task 1 – Review context

Contents in this section:

Task 1 – Review context
Task 2 – Conduct stakeholder engagement

PLAN

A scoping of cultural heritage should be undertaken as early as possible in the asset lifecycle. Sites in Discovery should conduct a provisional assessment, with a more comprehensive scoping carried out in the Project Development stage (see Section 2).

If the scoping shows the potential for significant impacts on cultural heritage, a Cultural Heritage Management Plan (CHMP) may be needed.

Regardless of whether cultural heritage is screened in under Task 1 of Section 2 – Review and Planning, all sites must have a Chance Find Procedure (CFP) (see 4H.2 Task 6).

The extent of the scoping exercise required will depend on the size of the project/site, the results of previous cultural heritage investigations in the area (if any), and host-country cultural heritage requirements. In some cases, for example where the area has been extensively mapped already, the scoping may only need a combination of desktop research and stakeholder consultations; in others, a field survey might be necessary.

Task 1 – Review context

The cultural heritage landscape across the site’s area of influence should be mapped. The objective is to develop an overall picture of cultural heritage in the region as a basis for understanding the different ways in which a site might affect both tangible and intangible cultural heritage, now or in the future.

Table 4H.1 provides an overview of the different types of cultural heritage that sites should map. Information should be drawn from multiple sources, including national archives, previous specialist studies, cultural heritage specialists and discussions with stakeholders. All cultural heritage should be described, listed and inventoried.

| Tangible and intangible cultural heritage | Table 4H.1 |

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
Cultural heritage does not end at monuments and collections of objects. It also includes traditions or living expressions inherited and passed on, such as:

- Oral traditions
- Performing arts
- Social practices, rituals, festive events
- Knowledge and practices concerning nature and the universe
- The knowledge and skills to produce traditional crafts.

Tangible cultural heritage

Intangible cultural heritage

The importance of intangible cultural heritage is not the cultural manifestation itself, but rather the wealth of knowledge and skills that is transmitted through it from one generation to the next. The social and economic value of this transmission of knowledge is relevant for minority groups and for mainstream social groups.

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Cultural heritage is a sensitive topic for many communities and affected stakeholders are the best (and sometimes only) source of information. Their perspectives are critical to identifying cultural heritage and the development of appropriate mitigation measures.

Section 3A provides detailed guidance on consulting with stakeholders. Where relevant, consultations focused on cultural heritage should be included in the SEP.

A coherent, standardised message about cultural heritage management should be developed by the social performance team prior to the commencement of stakeholder engagement activities to ensure that a consistent message is communicated to stakeholders. This message should include the mitigation hierarchy of avoid, minimise, mitigate and, as a last resort, remediate. It is important to demonstrate that every reasonable effort will be made to respect a community's cultural heritage.

Other key messages include:

- Anglo American's policies and commitments regarding cultural heritage management, i.e. Social Way requirements and this guidance
- Information on the site and potential impacts
- The community's legal rights in relation to the potentially affected cultural heritage.

Box 4H.3 Key stakeholders

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
National and local museums, cultural and academic institutions
Civil society concerned with cultural heritage or historical preservation.

A social performance team member with an established relationship with local stakeholders (rather than the most subject expertise) may be best placed to engage on cultural heritage topics.

The individual with the most technical knowledge of cultural heritage is best suited to liaise with other external stakeholders, including relevant authorities and cultural and academic institutions.

In some cases, it may be necessary to involve a third-party organisation – representative of or affiliated to the community in question – particularly in cases where there is sensitivity around discussing rituals or ceremonies with outsiders.

Newly identified cultural heritage sites, particularly sites used for rituals, should be corroborated by different stakeholders to triangulate findings and prevent speculation (i.e. the identification of false sites in the hope of compensation).

Triangulation must be done in collaboration with the appropriate authorities. These sites should be assessed by a suitably qualified cultural heritage specialist to determine their significance.

As part of social performance review and planning (see Section 2), sites are required to identify systemic vulnerability (i.e. individuals or groups with a reduced or compromised ability to realise or maintain a sustainable livelihood).

As part of the annual SEP (see Section 3A), sites should identify those excluded or inhibited from meaningful participation. Special efforts may need to be taken to ensure their inclusion.

Section 3A provides specific guidance on engaging with women and vulnerable groups. In respect of cultural heritage specifically, this includes:

- ensuring adequate input from all affected stakeholders during baseline data collection and development.
- recognising that some forms of intangible cultural heritage may be practised exclusively by women, the elderly or the youth, and that their inputs are required for the identification of this type of heritage.
- acknowledging that community members experience cultural heritage in different ways, that understanding these differences is an important component of successful cultural heritage management, and that this should be highlighted in the CHMP.
- being aware of possible conflict between respect for cultural heritage and respect for human (often women’s) rights, particularly in the context of intangible heritage. For example, female genital mutilation is a breach of universal human rights norms and should thus not be considered intangible heritage requiring preservation. In less extreme examples, intangible cultural heritage may be discriminatory based on sex, age, religion or race. If in doubt, the social performance team should seek guidance from a suitably qualified professional to understand the origins and purpose of the practice in question, and how to manage it in an appropriate manner.

As part of cultural heritage management, sites should identify specific vulnerability, for example critical or non-replicable cultural heritage or communities who may be more severely affected by adverse impacts on cultural heritage. This is especially relevant in relation to intangible cultural heritage where the impacts may be less visible and more gradual and where the customs and traditions of minority groups may be under threat.

Box 4H.4 Inclusion and diversity
Task 3 – Update SHIRA

Cultural heritage impacts should be assessed, and a summary of risks and impacts included in SHIRA.

The spatially referenced inventory of known, tangible cultural heritage should be mapped and overlaid on the site footprint, including licence area, cadastral boundaries, infrastructure locations, blasting zones and other relevant information. The social performance team, together with relevant specialists, should analyse each cultural heritage site to determine the potential for, and the nature and timing of, adverse impacts.

DO stage includes updating SHIRA and developing and implementing a Cultural Heritage Management Plan (CHMP) if necessary. Sites are required to develop a CHMP if impacts are likely on tangible cultural heritage and/or if intangible cultural heritage is practised amongst affected communities.

If cultural heritage impacts are restricted to Indigenous Peoples, the CHMP should be developed in line with the guidance in this chapter, but should be integrated into the Indigenous Peoples Plan (see Section 4I).

Cultural heritage impacts resulting from or associated with physical or economic displacement must be included in the DO and managed in accordance with this standard. As such, if graves are identified as displaced assets under the Land Access, Displacement and Resettlement standard (see Section 4F), the Cultural Heritage standard is triggered and a Grave Relocation Process (GRP) is required to relocate the graves (see 4H.2 Task 5).

If scoping suggests impacts are unlikely or minimal, only a chance find procedure (CFP) will be required. However, sites should continue to anticipate and track impacts through their Stakeholder Engagement (see Section 3A), Incident and Grievance Management (see Section 3B), SHIRA (see Section 3C) and relevant Management Plans (see Section 4).
Impacts on intangible cultural heritage may be less easy to anticipate and may only become apparent over time. Social change may be driven as much by the positive opportunities created by the site as by any disruptive activities. Social performance teams should therefore adopt a precautionary approach: identifying and documenting any intangible cultural heritage practised by affected communities and planning on the assumption that the long-term presence of the site will have a substantial impact. In the event that significant impacts are likely, these should be managed and monitored as part of the site's management plan. This may also require the development of a Grave Relocation Plan.

States that are signatories to the Convention on the Safeguarding of the Intangible Cultural Heritage are obliged to compile inventories of intangible cultural heritage on their territories. UNESCO itself maintains a List of Intangible Cultural Heritage in Need of Urgent Safeguarding and a Representative List of the Intangible Cultural Heritage of Humanity. These can be used as a reference point.

Some forms of both tangible and intangible cultural heritage may not be protected under national legislation or may not even be recognised by the authorities. Sites will need specialist support but should not rely exclusively on expert advice. A process of engagement with affected communities is needed to establish whether certain practices are expressions of a community's cultural identity.

Assessment of impacts on tangible and intangible cultural heritage should be summarised in SHIRA and recorded in the site's Baseline workplace risk assessment and control (WRAC) (see Section 3C). The process for assessing vulnerability in relation to cultural heritage and final consequence and prioritisation should follow the steps outlined in 3C.

The assessment of potential impacts and risks should inform project/site design decisions, as well as the development of mitigation measures (if needed) and compensation; for example:

If a cultural heritage site of exceptional significance or irreplaceable value has been identified, engineering plans may need to be redesigned to avoid that particular place. Where cultural heritage is identified within the site's footprint and likely to be impacted by new infrastructure, the appropriate mitigation measures should be agreed with the relevant authorities and stakeholders and implemented in advance. The measures should be incorporated into the project schedule.

If removal of cultural heritage is unavoidable, sites should engage in good-faith negotiations prior to taking any action. This should involve:

- Assessing stakeholders' willingness to engage in the process, and their availability to meet at reasonable times and frequency
- Providing project-related information relevant to the cultural heritage impact in question to enable informed participation during the negotiation process
- Discussion and exploration of key issues of importance
- Mutually acceptable procedures for the negotiation
- Willingness to change initial positions, modify offers where possible and allow sufficient time for decision-making

Where cultural heritage is identified within the mine site's footprint and unlikely to be impacted, it is preferable to leave it in situ, especially graves and cemeteries. However, an adequate buffer area around the site should be demarcated and access agreed with relevant stakeholders.
Integration of cultural heritage management into the Life of Asset Plan process is critical (see Section 2). Proposed site changes and developments contained in the Plan should be assessed for their potential impacts on cultural heritage to allow for design changes, where necessary, or ensure advanced planning for mitigation measures.


Impacts on Indigenous Peoples' intangible (living) cultural heritage should be avoided wherever possible. If unavoidable, extensive consultation is required with a view to obtaining Free Prior and Informed Consent (FPIC) (see Section 4).
A Cultural Heritage Management Plan (CHMP) is an overarching plan that stipulates how affected cultural heritage will be managed throughout an asset's lifecycle. The core of a CHMP is the mitigation and management measures compliant with national legislation and aligned with international good practice, specifically IFC.

A CHMP should:

- Contain a consolidated list of all cultural heritage potentially affected by the site, inclusive of photographic records and spatial references for the boundaries of the site (i.e. not just a point location)
- Be culturally appropriate and acceptable to community and other local stakeholders, and respectful of local traditions and cultural norms
- Include milestones or schedule for managing cultural heritage, linked to the site's construction or operations
- Schedule an endeavour to preserve cultural heritage in situ and allow for continued community access to the site.
- Outline a specific engagement plan that ensures the participation of affected communities and relevant local and national authorities/institutions.

Implementation requires dedicated staff and resources and should be undertaken in accordance with the specified milestones/schedule. Whether or not a dedicated cultural heritage team is required depends on the significance of the site's impact on cultural heritage. If a site is associated with substantial cultural heritage impacts, it will need specialist CHMPs to be developed in consultation with key stakeholders, including religious leaders and community elders.
Specialists are needed to help prevent or minimise impacts. This may include conducting archaeological excavations, cataloguing and preserving artefacts, and managing or facilitating grave or sacred-site relocations (see 4H Task 5). The team must also maintain comprehensive records and develop effective monitoring and evaluation processes. If the scoping process determined that site activities are associated with considerable cultural heritage impacts, sites should consider having a suitably qualified cultural heritage specialist on site.

General cultural heritage management guidelines include the following:

- **Implementation of the CHMP**
  - can only commence upon agreement with stakeholders, including the appropriate authorities. Depending on the agreed structure of the Community Engagement Forum (see Section 3A), and the significance of cultural heritage in the local area, it may be useful to establish a specific working group within the Community Engagement Forum (CEF) focused on cultural heritage, including monitoring and evaluation.

- **If tangible heritage remains in situ**, ensure access to the resource for the life of asset. The nature of access must be determined in collaboration with stakeholders and can range from being continuous, on an ad hoc basis, or during a few pre-determined times throughout a year. Social performance teams must remain flexible with regards to access to in situ resources in order to accommodate stakeholders' wishes, as far as is reasonable.

- **If there is no alternative to relocation and a grave or cemetery must be moved**, a Grave Relocation Plan must be developed and implemented in collaboration with a suitably qualified cultural heritage specialist (see 4H Task 5).

- **In some instances**, cultural heritage sites discovered in proximity to a site may hold local economic opportunity, either through commercialisation of tangible or intangible cultural heritage (e.g. medicinal plants, traditional handicrafts) or through potential as tourist attractions. In such cases, the site is required to undertake Informed Consultation and Participation (ICP) with stakeholders, and where appropriate, specialised support may be required to help local communities develop the opportunity. Proposals should be incorporated into sites’ plans and are subject to the explicit agreement and ongoing participation of the affected communities. Any initiatives should benefit the affected communities in a fair and equitable manner.

- **Please note that additional considerations are needed in relation to the commercialisation of cultural heritage when stakeholders are/or include Indigenous Peoples** (see Section 4I. Indigenous Peoples).
Task 5 – Develop a Grave Relocation Plan (where applicable)

Contents in this section:
Task 3 – Update SHIRA
Task 4 – Develop a Cultural Heritage Management Plan
Task 5 – Develop a Grave Relocation Plan (where applicable)
Task 6 – Develop a Chance Find Procedure

In the event that graves must be relocated (whether as a result of impacts on the graves or as part of a resettlement process), the exhumation and reburial process must be agreed with the next of kin of the deceased, and religious or community leaders, authorities and other stakeholders as appropriate. Cultures have different rituals to be performed and procedures to be followed. These must be respected and facilitated by the social performance team.

Sites should engage the services of a qualified cultural heritage specialist to develop a Grave Relocation Plan (GRP). The GRP must comply with national and local legislative requirements. In the absence of legislated requirements, it is recommended that the GRP follows the following process:

1. Identification: displaced graves must be surveyed, and relevant information captured in a spatially-referenced dataset;
2. Avoidance and minimisation: a final attempt must be made to avoid displacing graves, and if not possible, to minimise the displacement;
3. Consultation: next of kin of the deceased must be consulted to reach agreement regarding the grave relocation, including entitlements;
4. Permitting: as applicable, the necessary permitting must be obtained for implementation;
5. Implementation: graves must be exhumed and reburied in a culturally sensitive and appropriate manner and in accordance with agreements reached with the next of kin and permit conditions as applicable.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT
Relocation of graves and cemeteries is common in the context of resettlement; if graves are to be relocated as part of a resettlement process, a GRP must be developed as per this Section and subsequently integrated into the process (see Section 4F).
Task 6 – Develop a Chance Find Procedure

Contents in this section:

Task 3 – Update SHIRA
Task 4 – Develop a Cultural Heritage Management Plan
Task 5 – Develop a Grave Relocation Plan (where applicable)
Task 6 – Develop a Chance Find Procedure

A CFP is a site-specific procedure detailing the steps to be followed if a previously unknown heritage resource is discovered. Normally the CFP should be developed as part of the CHMP; however, sites not requiring a CHMP will develop a stand-alone CFP.

Most chance finds will occur during the Construction or Operations phase of an asset, and will likely be discovered by contractors, sub-contractors or other technical staff. Awareness of the CFP amongst all teams is essential and should be incorporated into staff and contractor inductions.

The CFP should include:

- Record-keeping and expert verification procedures
- Criteria for temporary work stoppages that may be required to allow for rapid disposition of issues related to the finds
- Chain-of-custody instructions for movable finds when finds are moved, who handles them, who catalogues them, and where their final resting place should be
- Roles, responsibilities and response times of project staff and the competent authority in dealing with the find; and
- Agreed consultation procedures in the event of a chance find.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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<thead>
<tr>
<th>Task</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Secure the area, take photos and record details.</td>
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<td>2</td>
<td>Conduct an evaluation by qualified specialists.</td>
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<td>3</td>
<td>If the find is significant, notify the relevant authorities.</td>
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<td>4</td>
<td>Cease further investigation by relevant authorities.</td>
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<tr>
<td>5</td>
<td>Operations resume following implementation of investigation's findings and written permission from authorities.</td>
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</tbody>
</table>

*FIGURE 4H.2 Chance Find Procedure*
The Social Way provides an overall framework for M&E (see Section 1).

Where a site's impact on cultural heritage is significant, the social performance team should involve a cultural heritage specialist in supporting monitoring and evaluation.

**Task 7 – Monitor and evaluate**

**M&E incorporates two elements:**

- Monitoring is the continuous checking of progress against the milestones or timeframes defined in the plan. It involves systematic and regular data collection and is undertaken to determine whether implementation is on track.
- Evaluation is the process of determining whether the plan is effective in its objective: to mitigate and manage the impacts associated with cultural heritage. The purpose of evaluation is to improve the effectiveness and sustainability of the plan.

**Cultural heritage record:** provides an up-to-date record and description of cultural heritage (see Table 4H.2). The description of cultural heritage should be recorded (and updated where necessary) in the plan.

**Key Performance Indicators (KPIs) for prevention/mitigation measures (see Table 4H.3).**

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
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<tbody>
<tr>
<td>Tangible</td>
<td>Number and type of tangible sites identified, both movable and immovable</td>
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**TABLE 4H.3 Example**

**Objective**
Describe the (potential) impact

**Activities/Control**
List the actions required to manage the impact

**Control Owner**
List the department or individual responsible for the Control

**Timeline**
Detail the time by which the activities should be done

**Inputs**
Human and financial resources needed to implement the activities

**Outputs**
Deliverables produced as a result of the activities

**Outcomes**
Changes that have occurred as a result. Include sources of verification (see M&E framework)

**Effectiveness**
Value and success in managing the impact. Include sources of verification

**Context**
Intangible Description of intangible cultural heritage impacted

**KPIs**
- Physical evidence
- Documentary evidence (access rights)
- Community feedback
- Incident and grievance records

**Example**
- Relocation of multiple graves
  - Consultations with relevant stakeholders
  - Social Performance
  - Date
  - Staff time
  - Meetings held
  - Relocation site identified and agreed
  - Relocation ceremony agreed and held
  - Graves relocated
  - Access to graves secured for community in new location
  - Verification: Community satisfied with process
  - No complaints received
  - Land made available for site
  - Verification: Documentary evidence (e.g. agreements/permits)
  - Options for alternative locations identified
  - Social Performance
  - Determine appropriate ceremonies or rituals
  - Social Performance
  - Date
  - Expenditure on acquiring land
  - Expenditure on consultant to support the process

**Number and type of impacted sites identified**
**Number of artefacts found**
**Number of artefacts catalogued**
**Number of artefacts handed over to the authorities**
Cultural heritage is an issue where participatory monitoring is essential. It should be conducted in collaboration with stakeholders, particularly the affected community and relevant authorities. There are several ways in which communities can be involved in monitoring:

- Co-design of Outcomes and Impacts/Effectiveness KPIs
- Participation and recording of ceremonies/rituals
- Observation of removal of cultural heritage.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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Cultural heritage management may be required through multiple stages of an asset's lifecycle. The plan should be understood as a living document that may require improvements and regular updating.

Task 9 – Adjust

The plan and framework should be reviewed and updated (if necessary) on an annual basis. Updates should be based on evaluations conducted jointly with affected communities. These should be incorporated into the consultation component of the CHMP. The evaluation may indicate that further specialist studies are required; for example, additional baseline data collection.

Ongoing consultation and sites' social incident and grievance mechanism will provide a means of tracking any concerns over activities or progress relating to management of cultural heritage impacts. Grievances related to cultural heritage should be communicated to the individual responsible for managing the CHMP.

Any updates to the plan should be reflected as appropriate in sites' baseline workplace risk assessment and control (WRAC) and the SMP.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT
**Task 10 – Report**

Contents in this section:

**Task 9 – Adjust**

**Task 10 – Report**

Reporting is required to demonstrate to internal and external stakeholders how cultural heritage is managed. Tables 4H.4 and 4H.5 respectively contain requirements for internal and external reporting.

### Table 4H.4 Internal reporting guidelines for cultural heritage management

<table>
<thead>
<tr>
<th>SITE LEVEL</th>
<th>INDIVIDUAL REPORTING REQUIREMENT</th>
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<tbody>
<tr>
<td>SITE or SHE TEAM or SHE specialist with responsibility for cultural heritage</td>
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### Table 4H.5 External reporting guidelines for cultural heritage management

<table>
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<tr>
<th>COMPANY LEVEL</th>
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</tr>
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<tbody>
<tr>
<td>GROUP Communications</td>
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<tr>
<td>BUSINESS UNIT Corporate Affairs</td>
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</tr>
<tr>
<td>SITE or SHE TEAM or SHE specialist with responsibility for cultural heritage</td>
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</table>

- **SP**
  - Quarterly updates of the cultural heritage landscape and implementation to the CHMP, GM, HoDs, and BU.
  - Reports includes all chance finds during the reporting period, stakeholder engagement activities relating to cultural heritage and, if appropriate, cataloguing activities, with clear photos of all artefacts.
  - Include details on site cultural heritage management activities in promotional materials and on website.
  - Annual reports to the competent authority on cultural heritage management activities in line with regulatory/permitting requirements.
  - Results of joint monitoring and evaluation with affected communities.
  - As relevant, reports to the CHMP or equivalent engagement structure regarding implementation, chance finds and status of grievances relating to cultural heritage.

---

**4. IMPACT AND RISK PREVENTION AND MANAGEMENT**

Act
4H.3 Management and resources

Contents in this section:
4H.1 Introduction
4H.2 Guidance
4H.3 Management and resources
4H.4 Tools

Lines of accountability

Roles and responsibilities for the management of cultural heritage are shown in Table 4H.6.

<table>
<thead>
<tr>
<th>COMPANY</th>
<th>LEVEL</th>
<th>INDIVIDUAL</th>
<th>ROLE AND RESPONSIBILITIES</th>
</tr>
</thead>
<tbody>
<tr>
<td>GROUP</td>
<td>Group Social Performance</td>
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<tr>
<td>BUSINESS UNIT</td>
<td>Manager/Head of Corporate Affairs</td>
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<tr>
<td>SITE or SHE TEAM</td>
<td>or SHE specialist with responsibility for cultural heritage</td>
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<tr>
<td>SP</td>
<td>Map the cultural heritage landscape</td>
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<tr>
<td>IFC</td>
<td>Analysis and assessment</td>
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<tr>
<td>SP</td>
<td>Provide guidance and advice on how to meet, as well as Anglo American policy</td>
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<td></td>
<td>IFC/SP/SP/SP</td>
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<td>SP</td>
<td>Support consultations with government officials</td>
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<tr>
<td></td>
<td>CHMP</td>
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<tr>
<td>SP</td>
<td>Ensure cultural heritage management is implemented as per the CHMP</td>
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<tr>
<td>SP</td>
<td>Receive quarterly updates on implementation and assesses performance</td>
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<tr>
<td>SP</td>
<td>Review studies conducted by cultural heritage specialists</td>
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<tr>
<td>SP</td>
<td>Be familiar with the cultural heritage resources at the site and understand the associated risks and impacts</td>
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<tr>
<td>SP</td>
<td>Engage with stakeholders on cultural heritage matters and ensure adequate record-keeping of engagement</td>
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<tr>
<td>SP</td>
<td>Engage relevant expertise to review studies</td>
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<tr>
<td>SP</td>
<td>Ensure that all identified cultural heritage sites are spatially referenced (GPS co-ordinates), described</td>
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</table>

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4H Cultural Heritage
### ROLES AND RESPONSIBILITIES IN CULTURAL HERITAGE

#### SITE MANAGEMENT

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibility</th>
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<tbody>
<tr>
<td>k</td>
<td>Developing management measures</td>
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<tr>
<td>f</td>
<td>Implementation</td>
</tr>
<tr>
<td>f</td>
<td>Monitoring and evaluation</td>
</tr>
<tr>
<td>A</td>
<td>Reporting and record keeping</td>
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<tr>
<td>k</td>
<td>Awareness-raising</td>
</tr>
</tbody>
</table>

#### Social Performance

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>CFP</td>
<td>Ensure that intangible heritage resources are appropriately documented and verified</td>
</tr>
<tr>
<td>CHMP</td>
<td>Understand the required management and mitigation measures for each cultural heritage resource</td>
</tr>
<tr>
<td></td>
<td>Analyse identified cultural heritage sites in light of site activities and future plans, and prioritise engagement topics with stakeholders accordingly</td>
</tr>
<tr>
<td></td>
<td>Develop/update/review the Site Management Plan in collaboration with a specialist</td>
</tr>
<tr>
<td></td>
<td>Advise on additional specialist studies to be undertaken and develop/review the Terms of Reference for these studies</td>
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<tr>
<td></td>
<td>Ensure consistency and coherence with related Management Plans (e.g. RAP)</td>
</tr>
<tr>
<td></td>
<td>Implement the Site Management Plan in collaboration with an external specialist, if required</td>
</tr>
<tr>
<td></td>
<td>Oversee implementation of the Site Management Plan</td>
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<tr>
<td></td>
<td>Ongoing record-keeping</td>
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<tr>
<td></td>
<td>Monitor the implementation of the Site Management Plan against milestones/schedule</td>
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<tr>
<td></td>
<td>Monitor implementation of the Cultural Heritage Protection Plan</td>
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<tr>
<td></td>
<td>Evaluate whether the Cultural Heritage Protection Plan is sufficient for managing the site’s cultural heritage risks and impacts</td>
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<tr>
<td></td>
<td>Manage cultural heritage-related grievances and use them to inform updates to the Site Management Plan</td>
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<td></td>
<td>Provide quarterly updates of the cultural heritage landscape and monitoring reports to the General Manager (GM), Heads of Department (HoDs) and (depending on level of risk – this may be less frequent in lower-risk, stable contexts)</td>
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<td></td>
<td>Create/maintain/secure an electronic library of all documents relevant to cultural heritage, including studies, management plans</td>
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<td></td>
<td>Maintain records of engagements related to cultural heritage in the site’s integrated stakeholder database</td>
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<td></td>
<td>Promote working knowledge of the Cultural Heritage Protection Plan amongst other technical departments and site management</td>
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<td></td>
<td>Oversee implementation of the Cultural Heritage Protection Plan</td>
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<td></td>
<td>Gain working knowledge of the Site Management Plan and Cultural Heritage Protection Plan and raise awareness of its purpose across the site, including contractors and sub-contractors</td>
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<td></td>
<td>Gain working knowledge of the Site Management Plan and Cultural Heritage Protection Plan</td>
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#### GM

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<th>Role</th>
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<td></td>
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#### HoDs

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<td></td>
<td>Gain working knowledge of the Site Management Plan and Cultural Heritage Protection Plan</td>
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</tbody>
</table>
### ROLES AND RESPONSIBILITIES IN CULTURAL HERITAGE

#### CONTRACTORS AND SUB-CONTRACTORS

- Ensure awareness and working knowledge of the CFP among all team members.
- Facilitate communication between departments and the team if evidence of cultural heritage is found.
- Hold health, safety, security and environment (HSSE) sessions with all sub-contractors and toolbox presentation on the importance of CFP.

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4H Tool 1 - Conditions for the removal and/or treatment of tangible cultural heritage

Types of tangible cultural heritage

Replicable cultural heritage: tangible forms of cultural heritage that can themselves be moved to another location

Non-replicable cultural heritage: Unique or relatively unique for the period it represents, and/or unique or relatively unique in linking several periods in the same site

IFC

PS

Minimise adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it

Where restoration in situ is not possible, restore the functionality of the cultural heritage in a different location, including the ecosystem processes needed to support it

Only where minimisation of adverse impacts and restoration to ensure maintenance of the value and functionality of the cultural heritage are demonstrably not feasible, and where the affected communities are using the tangible cultural heritage for longstanding cultural purposes, compensate for loss of that tangible cultural heritage.

Where possible, site components should be designed or redesigned to avoid impacts to non-replicable cultural heritage resources.

For archaeological resources, if avoidance is determined to be technically or financially infeasible, archaeological salvage excavations are a viable mitigation option.

For built-heritage resources, relocation is a viable option, but every effort should be made to preserve and transfer the cultural significance of the resource. If the resource is to be removed, removal should be accompanied by extensive documentation such as scale drawings and digital photographic documentation

For living heritage resources, removal and/or relocation will be undertaken in consultation with relevant local stakeholders. Every effort shall be made to develop a removal or relocation plan that incorporates local believes or practices, preserves the cultural value of the resource and, if possible, allows the cultural value to be transferred to the new or relocated resource

There are no technically or financially feasible alternatives to removal

The overall benefits of the project conclusively outweigh the anticipated cultural heritage loss from removal

Any removal of cultural heritage is conducted using the best-available techniques

The site is responsible for thoroughly documenting that there are no technically or financially feasible alternatives to removing the resource, including demonstrating that the overall benefits of the project conclusively outweigh the anticipated cultural heritage loss

The development of a treatment plan for the removal of the resource must be done in consultation with local, regional, and national stakeholders

For archaeological resources, salvage excavations must be carried out using the best-available techniques and be overseen/directed by a qualified archaeological professional

For built-heritage and living-heritage resources, removal and or relocation plans will be developed in consultation with relevant local,
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Critical cultural heritage: Internationally recognised heritage of communities who use, or have used within living memory, the cultural heritage for longstanding cultural purposes. Legally protected cultural heritage areas, including those proposed by host governments for such designation.

The client should not remove, significantly alter, or damage critical cultural heritage. When impacts on critical cultural heritage are unavoidable, a process of informed consultation is essential, including the meaningful participation of the communities in decision-making.

In relation to legally protected areas, sites should:
- Comply with defined national or local cultural heritage regulations or the protected area management plans.
- Consult the protected area sponsors and managers, local communities and other key stakeholders on the proposed project.
- Implement additional programmes, as appropriate, to promote and enhance the conservation aims of the protected area.

The site is responsible for thoroughly documenting that there are no technically or financially feasible alternatives to removing the resource, including demonstrating that the overall benefits of the project conclusively outweigh the anticipated cultural heritage loss. Assessment should be reviewed and evaluated, and verified by independent, third-party cultural heritage expert(s).

Treatment plans for the removal of critical cultural heritage resources will be developed in consultation with local, regional, national, and international cultural heritage stakeholders. Treatment plans will be reviewed and evaluated by an independent, third party, cultural heritage expert(s) with extensive knowledge of the resource(s) to be removed.
<table>
<thead>
<tr>
<th>Section</th>
<th>Contents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graves</td>
<td>Cultural heritage property-management measures at household and community level, including:</td>
</tr>
<tr>
<td></td>
<td>Programme and responsibilities</td>
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<td></td>
<td>Monitoring and evaluation</td>
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<td>Updated</td>
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<td>Approval</td>
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<td>Photo gallery</td>
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**4H Tool 3 – Sample Chance Find Procedure**

### Purpose

The Chance Find Procedure (CFP) is required as exploration, construction and operational activities will likely be undertaken in areas where unknown heritage resources, known as Chance Finds (CF) could be present. The CFP prescribes the measures to be followed to ensure that CFs are managed in a manner consistent with the Group Standards. CFs include movable and immovable objects, sites, structures or groups of structures having archaeological, paleontological, historical, architectural, religious, aesthetic or other cultural significance.

### Scope

The CFP is applicable to all activities conducted by personnel, visitor and contractors that could potentially uncover CFs. It details the actions to be taken when CFs are found during exploration, construction and operational activities. The CFP describes training requirements, immediate actions to be taken when CFs are uncovered, communication and processing protocols, and reporting requirements.

### Training and induction

CFs can be uncovered by any member of the site team, contractors or visitors. For the CFP to be effective, the site must ensure that:

- Awareness training is conducted.
- Collection of site area archaeological sample is undertaken.
- Cultural heritage property management during the construction phase is considered.
- Management Plan costs are considered.
- Proposed budget is considered.
- Monitoring and evaluation framework for prevention and impact management controls (as per SHIRA) is considered.
- Frequency of SIM Management Plan update is considered.
- Approval of Cultural Heritage Management Plan is considered.

As appropriate, images of relevant cultural heritage are considered.

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### Steps to Follow Upon Discovery of a Cultural Heritage Resource

Upon discovery of a cultural heritage resource, the following steps should be followed:

1. **Immediate Action:**
   - **Notification:** EM, together with PSR representative issue urgent instruction to properly demarcate and watch over site.
   - **Demarcation:** Establish a 25 metre buffer zone from all sides of the find.
   - **Pausing Work:** After stopping the work, contact the Environmental Manager (EM) immediately to (1) report and describe the CF and requisite actions.

2. **Processing:**
   - **Notification:** EM, HS confirm standard removal process with EM. EM instructs appropriate resource to remove object (if it is an easily movable object such as a coin or potshard) and re-initiate any stopped activities.

3. **Loss Prevention:**
   - **Further Processing:** EM engages ad hoc heritage specialist (HS) to assess the find remotely or via site visit, whichever is appropriate. Specialist recommendation should specify whether the CF has no, negligible, low, medium or high significance.
   - **Specialist Assessment:** Specialist will verify the finding and assess its potential significance. HS to report finding and recommend appropriate action to EM.
   - **Recommendation:** EM engages ad hoc heritage specialist (HS) to assess the find remotely or via site visit, whichever is appropriate.

4. **Decision Making:**
   - **Recommendation:** Specialist recommendation will describe the following:
     - **Withdrawal Requirements:** The processing time of significant CFs will vary depending on the nature of the CF. The processing requirements that will be followed will depend on the assessment and recommendation of the HS.
     - **Chain of Custody:** HS confirms standard removal process with EM. EM instructs appropriate resource to remove object (if it is an easily movable object such as a coin or potshard) and re-initiate any stopped activities.
     - **Prevention Methods:** HS confirms standard removal process with EM. EM instructs appropriate resource to remove object (if it is an easily movable object such as a coin or potshard) and re-initiate any stopped activities.
     - **Further Steps:** HS confirms standard removal process with EM. EM instructs appropriate resource to remove object (if it is an easily movable object such as a coin or potshard) and re-initiate any stopped activities.

5. **Exporting:**
   - **Further Processing:** HS confirms standard removal process with EM. EM instructs appropriate resource to remove object (if it is an easily movable object such as a coin or potshard) and re-initiate any stopped activities.

6. **Reprocessing:**
   - **Further Processing:** HS confirms standard removal process with EM. EM instructs appropriate resource to remove object (if it is an easily movable object such as a coin or potshard) and re-initiate any stopped activities.

### Timing

- **Within 7 days of discovery:** Identify applicable statutory requirements
- **Within 2 days of discovery:** Confirm whether construction activities should be suspended until
- **Immediate after stoppage:**\[A\] 
- **Within 2 days of discovery:**\[Z\] 
- **Within 2 days of discovery:**\[W\] 
- **Within 2 days of discovery:**\[Y\] 
- **Within 2 days of discovery:**\[Y\] 
- **Same day as discovery:**\[9\]
### Steps Actions Timing Role

<table>
<thead>
<tr>
<th>Steps</th>
<th>Actions</th>
<th>Timing</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statutory notification &amp; mitigation</td>
<td>Should the specialist conclude that the find is a heritage resource protected in terms of national legislation, they will inform the EM and ensure that the appropriate authority is formally notified. HS will confirm with the relevant authority the processing and permitting requirements that apply to the find (e.g. requirements for additional heritage studies, grave relocations and/or rescue/preservation permits of highly significant sites). Project activities at an important find will resume after the implementation of government-approved mitigation measures, unless regulations allow for conditional continuation of activities.</td>
<td>Within 7 days (or as per national legislation)</td>
<td>HS, EM &amp; Heritage authority</td>
</tr>
<tr>
<td>Processing: Burial Grounds</td>
<td>In certain contexts, it may be anticipated that significant finds will likely be limited to human remains. After completing the previous steps, the following procedure should be followed:</td>
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<tr>
<td>1.</td>
<td>EM and HS to notify the local policing authority of burial site</td>
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<tr>
<td>2.</td>
<td>Engage relevant local government authorities to ensure compliance with by-laws</td>
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<td>3.</td>
<td>Specialist and EM to inspect the exposed burial and determine in consultation with policing authority the temporal context of the remains (i.e. noteworthy forensic features, authentic burial grave older than 60 years or archaeological burial older than 100 years) as well as whether there might be additional graves within the immediate vicinity of the find.</td>
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<td>4.</td>
<td>Should the specialist conclude that the find is a heritage resource protected in terms of national legislation, they will inform the relevant heritage authority on behalf of the Company and confirm mitigation requirements</td>
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<td>5.</td>
<td>Initiate grave relocation process according to national legislation and AASW requirements</td>
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<td>6.</td>
<td>Establish multidisciplinary team to manage grave relocation process, including representative from mine management, social performance, human resources, protection services, group legal and safety health and environmental</td>
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<td>7.</td>
<td>If necessary, the team will urgently appoint an experienced and qualified expert, which is appropriately registered in terms of national legislation Reporting to policing authority should be within 1 day of specialist assessment Timing of remainder of process should be determined in consultation with relevant authorities</td>
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### CONTACT DETAILS

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<tr>
<th>POSITION</th>
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### CHANCE FIND REPORT FORM

**PART 1: DESCRIPTION OF FIND**

- Recorder's Name/ affiliation
- Date
- Location (GPS coordinates)
- Description of the discovery
- Significance of discovery
- Estimated weight and dimensions i.e. feasibility to move the discovery
- Estimated time needed to conduct excavation of discovery
- Recommendation of how to proceed
- Temporary protection measures implemented, etc.

The EM will review, approve and store the rapid assessment report.

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CHANCE FIND REPORT FORM

Description of find

Description of location & GPS Coordinates

Photographs taken:

Sketch Map

PART 2: RAPID ASSESSMENT RECOMMENDATION

Notes on Part 1 description of find

Potential for removal

Security and protection requirements

Chain of custody and storage

Need for preservation and/or rescue

Continuation of stopped activities

Applicable statutory requirements

References


Contents in this section:

4I Indigenous Peoples

4I.1 About Indigenous Peoples

Anglo American respects internationally recognised indigenous rights and complies with national laws and international standards as they relate to Indigenous Peoples.

This section provides guidance on identifying and engaging with Indigenous Peoples throughout the life of an asset. It supports sites in managing issues related to Indigenous Peoples with a view to achieving mutually beneficial, sustainable, and equitable outcomes.

This section is aligned with relevant international standards and good practice, including the International Finance Corporation (IFC) Performance Standard 7 (PS 7), and the International Council on Mining and Metals (ICMM) Position Statement on Indigenous Peoples (see Box 4I.1).

1. Engage with potentially impacted Indigenous Peoples with the objectives of ensuring that the development of mining and metals projects fosters respect for the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples; designing projects to avoid adverse impacts and minimising, managing or compensating for unavoidable residual impacts; and ensuring sustainable benefits and opportunities for Indigenous Peoples through the development of mining and metals projects.

2. Understand and respect the rights, interests and perspectives of Indigenous Peoples regarding a site and its potential impacts.

3. Agree on appropriate engagement and consultation processes with potentially impacted Indigenous Peoples and relevant government authorities as early as possible during site planning, to ensure the meaningful participation of Indigenous Peoples in decision making.

4. Work to obtain the consent of indigenous communities for new sites (and changes to existing sites) that are located on lands traditionally owned by or under customary use of Indigenous Peoples and are likely to have significant adverse impacts on Indigenous Peoples.

5. Collaborate with the responsible authorities to achieve outcomes consistent with the commitments in this position statement, in situations where government is responsible for managing Indigenous Peoples' interests in a way that limits company involvement.

6. Address the likelihood that differences of opinion will arise, which in some cases may lead to setbacks or delays in reaching a negotiated agreement in good faith.

Box 4I.1

Position Statement on Indigenous Peoples – six commitments (abbreviated)

ICMM
Specifically, this section:

**Intended users**

The intended users of this section are primarily social performance teams. Other functions, notably the government relations, operations, security, human resources, supply chain and safety, health and environment teams will also need to be aware of the issues, sensitivities and legal obligations that relate to engagement with Indigenous Peoples.

**Relevance to other sections**

This section provides an overview of Anglo American's approach to Indigenous Peoples and is supported by other guidance in the Social Way toolkit.

- Helps sites to identify Indigenous Peoples
- Helps to clarify the relative responsibilities of government and business regarding indigenous rights
- Provides guidance on the requirements for engagement with Indigenous Peoples
- Details the baseline data and contextual analysis required to underpin engagement
- Provides guidance on working to obtain the Free, Prior and Informed Consent (FPIC) of indigenous communities
- Outlines the requirement for the development of an Indigenous Peoples Plan (IPP)
- Lists the cross-departmental roles and responsibilities involved in working with Indigenous Peoples.

**Governance**

(Section 1): Engagement with Indigenous Peoples requires specific resources and skills. Section 1 details both the general capacity and expertise that social performance teams should build over time. Where Indigenous Peoples are identified, resources and skills should be available to appropriately engage with them and manage impacts.

- The SPMC should review the IPP.
- The external context review and baseline data collection should include information with regards to Indigenous Peoples. Sites may choose to integrate the IPP into the Social Management Plan (SMP), or if not, then the SPMC should refer to the IPP.

**Engagement and assessment**

(Section 3): Stakeholder engagement (3A) – this section describes tools and processes for meaningful stakeholder engagement. Additional requirements for engagement with Indigenous Peoples apply, including in relation to obtaining FPIC, which are outlined in this section.

- Incident and grievance management (3B) – Indigenous Peoples may have specific customs for raising and resolving grievances within their community, which should be identified and considered in the site's grievance process so that it is culturally appropriate and trusted.
Social and Human Rights Impact and Risk Analysis (SHIRA) – actual and potential adverse social and human rights impacts on indigenous people should be captured as part of the annual process.

SHIRA Risk and impact prevention and management (Section 4)

A. Socio-economic development (SED) (4A)
   - Generating socio-economic development opportunities for indigenous people through partnership and collaboration is key and should be captured in socio-economic development planning, prioritisation and project design and summarised in the
     IPP
     SMP

H. Cultural heritage (4H)
   - Tangible and intangible cultural heritage, as well as natural features or objects that embody cultural values are typically very important to Indigenous Peoples. Impacts on Indigenous Peoples' cultural heritage should be avoided where possible. If unavoidable, must be obtained prior to any activity that may impact on the cultural heritage of Indigenous Peoples, as described in this section.
   - Where the Cultural Heritage Management Plan relates to the cultural heritage of Indigenous Peoples, that plan forms part of the
     FPIC
     IPP
I.1 About Indigenous Peoples

Anglo American recognises the special rights, status and potential vulnerabilities of Indigenous Peoples. In addition to the human rights enjoyed by all individuals, Indigenous Peoples also enjoy collective indigenous rights, which are defined in international standards, principles and legal instruments and, in many cases, also in national legislation.

Indigenous people number around 370 million globally. They comprise 5% of the world's population but account for 15% of the extreme poor. While Indigenous Peoples own, occupy, or use a quarter of the world's surface area, they safeguard 80% of the world's remaining biodiversity. They are often amongst the most marginalised and vulnerable.

Sites are sometimes located close to or on Indigenous Peoples' lands and may impact on their lives, livelihoods, traditions, and culture. The term 'indigenous groups' is used in this section to refer to a sub-set of a 'people'. In such cases, relations with indigenous groups, which could encompass village communities, sections of communities, traditional resource-use collectives, etc, require particular attention for the following reasons:

International instruments and standards

Indigenous people are protected as individuals by internationally recognised human rights. In addition, international hard and soft (non-binding) law instruments recognise the collective rights of Indigenous Peoples, which include the right:

1. To special legal status is afforded to Indigenous Peoples internationally and, in many cases, nationally
2. For Indigenous Peoples to participate meaningfully in decision-making relating to developments on their lands
3. For the unique and rich cultural heritage of many Indigenous Peoples, which is protected by international law and, in many cases, national and sub-national legislation
4. For the valuable traditional knowledge about fauna and flora, landscapes and climate held by many indigenous groups
5. For the lack of legal recognition of Indigenous Peoples by some national governments
6. For the inherent vulnerability of some indigenous groups.

IMPACT AND RISK PREVENTION AND MANAGEMENT

I.1 Introduction
self-determination, culture, religion, non-discrimination, property and the means of subsistence, as well as the right to set and pursue their own priorities for development.

The two main instruments for protecting indigenous rights are the International Labour Organization (ILO) Convention 169 on Indigenous and Tribal Peoples in Independent Countries (C169), which is legally binding in the 23 countries which have ratified it, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). While it is not legally binding, an increasing number of countries incorporate its principles into national law.

Box 4I.2 Relevant international instruments

ILO and UNDRIP define government responsibilities for protecting the rights of Indigenous Peoples within their jurisdictions. In many cases, indigenous rights are protected by national legislation. In some cases, this legislation is poorly implemented and fails to provide adequate protections for indigenous people, particularly in the context of mineral-resource development. For example, sometimes indigenous people are not involved in decision-making related to resource development on their lands and, in other cases, certain indigenous groups are not legally recognised in their own countries, even when they are recognised by the United Nations.

In order to address governance gaps, reduce project and/or site risks and protect the territories, livelihoods and cultures of Indigenous Peoples affected by industrial projects, international good practice standards for respecting indigenous rights have also been developed by international financial institutions, industry associations and other global business initiatives. The guidance that follows is based on these good practice standards.

Anglo American’s Social Way aligns with the IFC Performance Standards. Performance Standard 7 (PS7) is the specific Standard that relates to Indigenous Peoples issues. Also important are PS1 (due diligence) and PS8 (cultural heritage) (see Section 4H). In some cases, other international financial institutions have additional criteria and wording that more fully or clearly address indigenous issues, which are highlighted, where relevant, in this guidance.

As a member of the ICMM, Anglo American has committed to the ICCM’s Sustainable Development Framework and the six commitments in its Position Statement on Indigenous Peoples (see Box 4I.1) and follows the guidance in Good Practice Guide on Indigenous Peoples and Mining. Where appropriate, this guidance highlights certain commitments and requirements of other industry initiatives to understand and minimise potential impacts to indigenous people.
All negotiations with indigenous communities should be conducted in good faith.

Negotiation in good faith is a bilateral (or sometimes multilateral) process, which requires the commitment and participation of each of the parties. Good-faith negotiation requires that all parties respect each other's decision-making processes and appreciate their constraints. In broad terms, good-faith negotiation involves all parties being willing to:

- Engage in negotiation and meet at reasonable times and frequency
- Provide information needed for informed negotiation and explore key issues of importance
- Agree mutually acceptable procedures for negotiation that include sufficient time for decision-making
- Compromise in pursuit of reaching a formal and documented agreement.

Good-faith negotiation strategies are a prerequisite to gaining and sustaining Free, Prior, and Informed Consent (FPIC). Guidance Note 7 explains that Free Prior and Informed Consent (FPIC) is both a process and an outcome, which builds on the requirements for informed consultation and participation (ICP) and additionally requires good-faith negotiation between the company and Affected Communities of Indigenous Peoples. The outcome, where the good-faith negotiation process is successful, is an agreement on the basis for which a project or site activities should proceed, and evidence of such agreement (see 4I.2 Task 6).

Discrete processes and/or agreements may be required in relation to different site activities or developments over the Life of Asset (LoA).

Sites are required to facilitate a process of (or, in other words, work to obtain) with the affected indigenous groups where:

- Indigenous communities should be able to freely make decisions without coercion, intimidation or manipulation
- Given sufficient time to be involved in decision-making before key decisions are made and impacts occur
- Fully informed about proposed site activities or a project and its potential adverse impacts.

There are potential adverse impacts (temporary or permanent) on lands and natural resources subject to traditional ownership or under customary use.

Relocation of indigenous groups from lands and natural resources subject to traditional ownership or under customary use is required.
The process is defined by the assertion of rights and the severity of (potential) adverse impacts, i.e. the more severe the (potential) adverse impacts, the more robust the process and the greater the effort to seek consent must be. Sites current in operation must work towards achieving the objectives of this chapter. This might include providing evidence of a process for current site activities and/or following a process to address past and present community concerns and compensate and/or remedy for past impacts on indigenous peoples' rights and interests. This process should be agreed to by the affected indigenous groups. New sites, and where changes to sites currently in operation are proposed that could result in new or increased impacts on indigenous peoples as listed above, a process to obtain must be followed.

Lifecycle planning

The identification of indigenous groups and initial engagement should ideally start prior to the Discovery stage. The collection of baseline data about Indigenous Peoples should begin during Discovery and be refined as the site advances through project study phases and into eventual Operations stage. Engagement with indigenous groups should start in Discovery and continue through to Post-Closure. Requirements for engaging with and managing issues related to Indigenous Peoples remain unchanged as the site moves into closure and post-closure. During operations, sites are required to co-define a post-mining land use plan and social transition success criteria with affected stakeholders (see Tool 1 of the Mine Closure Toolbox). Where indigenous groups are present within a site’s Area of Influence, or, where Indigenous Peoples’ lands or traditional territories overlap with a site’s Area of Influence, sites should consider whether special measures are needed to ensure that such people are meaningfully involved in this process and, where applicable, that LoA has been achieved for the final land-use plan and any other long-term projects or programmes that aim to achieve the success criteria (e.g. around economic diversification and reduced long-term dependency on mining).

Long-term objectives in the should be aligned with the mine-closure vision, social transition success criteria and post-mining land-use plan. Commitments related to social transition (implemented during operations) should be captured within the or any other negotiated agreement in place with the indigenous community, as necessary. The timeline of the and/or agreement should be clearly written into the document (i.e. whether it will continue after production and into the closure phase).

A participatory monitoring approach with indigenous people should be taken to monitor and evaluate activities related to both social transition and physical and biophysical closure, beginning in operations and continuing through to site relinquishment.
I.2 Guidance Overview

Contents in this section:

Plan
Do
Check
Act

The following provides a step-by-step guide. Anglo American’s Social Way follows the Plan Do Check Act (PDCA) management approach.

FIGURE 4I.1 THE CYCLE AS RELEVANT TO INDIGENOUS PEOPLES

PDCA

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4I.2 Guidance
Task 1 – Confirm presence of Indigenous Peoples

The presence of Indigenous Peoples near or within a site's Area of Influence and the extent of their lands or traditional territories needs to be determined as early as possible, before any mining-related activities are initiated. In most cases, a review of literature, United Nations and NGO documentation, and stakeholder engagement activities as part of the external context review, will indicate whether indigenous groups live on or use the land within a site's Area of Influence, or if Indigenous Peoples' lands or traditional territories overlap with a site's Area of Influence.

In other cases, it may be more difficult to establish the presence of indigenous groups. In such cases, the process of identifying the presence of indigenous groups and the extent of their land and territories should include engagement with relevant government agencies and experts on local Indigenous Peoples. The community itself should also have a say through their chosen representative.

The criteria to define Indigenous Peoples are as follows, and can apply in varying degrees:

1. **Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others**
2. **Collective attachment to geographically distinct habitats or ancestral territories in the site's Area of Influence and to the natural resources in these habitats and territories**

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**PLAN**

Task 1 – Confirm presence of Indigenous Peoples

Contents in this section:

Task 1 – Confirm presence of Indigenous Peoples

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**IMPACT AND RISK PREVENTION AND MANAGEMENT**

Plan
Customary cultural, economic, social or political institutions that are separate from those of the mainstream society or culture.

A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

Descent from populations who have traditionally pursued non-wage (and often nomadic/transhumant) subsistence strategies and whose status is regulated by their own customs or traditions or by special law or regulations.
International law states that the host-country government has the primary responsibility and obligation to protect Indigenous Peoples’ rights and consult with them prior to the start of activities on their lands. Sites should, with advisory support from a legal expert, analyse the host-country’s legal framework as it relates to indigenous rights and the host-country government’s recognition of and previous engagement and consultation with Indigenous Peoples. This includes:

- The host-country government may not have conducted any engagement activities with Indigenous Peoples about the site activities. The government may also have approved site activities on Indigenous Peoples’ lands without community consultation and engagement, or without a required process of FPIC. In such cases, the site should address gaps in the process undertaken to date and consult with Indigenous Peoples prior to starting any activities on their lands, where possible in collaboration with the relevant host-country government agencies (see 4I.2 Task 3 and Task 6).

FPIC

**Task 2 – Analyse legal framework and government’s engagement with Indigenous Peoples**
Task 3 – Develop a Community Engagement Plan

Sites should, together with the indigenous community or communities, develop and agree a Community Engagement Plan or equivalent. The objective of the Community Engagement Plan is to establish a process for engagement between the site and the indigenous community and for the meaningful participation of indigenous groups in decision-making. Sites should engage an indigenous adviser to support and advise on local culture, customs and engagement practices to inform initial engagement with indigenous communities. An Indigenous Peoples engagement officer or equivalent should also be appointed to maintain engagement with indigenous groups on an ongoing basis. Where Indigenous Peoples speak a different language or distinct dialect, the site team should ensure that there are senior level staff or the appropriate support that can communicate in that language.

The Community Engagement Plan should include the following elements:

- Mutually agreed values underpinning the engagement and process for good-faith negotiation between the site and the indigenous group, such as open, transparent, and respectful engagement. The site representatives should follow cultural protocols, allow sufficient time for meetings, discussions and decision-making to take place, and show respect at all times. An attitude of respectful listening and willingness to learn from indigenous people will help to build mutual trust and confidence.

- Mutually agreed objectives for engagement and how they are to be recognised.

- Mutually agreed procedures for engagement between the site and the indigenous groups. This may include agreement on the preferred avenues and formats for sharing information. Engagement may include regular site visits to see site activities. Logistical aspects, including when and where meetings will take place, should also be agreed.

- Mutually agreed participants in engagements between the site and the indigenous groups, and their respective responsibilities. Indigenous Peoples' representative bodies and organisations (e.g. councils of elders or village councils), as well as members of the wider indigenous community, should be involved in engagements. The Community Engagement Plan should establish ways to ensure adequate and fair representation in engagement activities, even where this may not be reflected in traditional representation structures. Engagement activities need to
be gender- and age-inclusive and involve a broad cross-section of members of the community. If there are societal norms or other barriers to participation in engagement activities for some groups, the site should make efforts to enhance levels of participation by establishing separate processes or other means of inclusive engagement; for example, holding informal discussions with these groups in separate meetings or by seeking the help of third parties who can gather input from these groups.

Mutually agreed process for obtaining consent where required. The Community Engagement Plan should include: a description of the process for seeking consent; a description of the site activities, project(s), objective(s), or outcomes consent is being sought for; define what consent is considered to be and how it will be demonstrated, as agreed with the affected indigenous community; explain how the indigenous community will make a collective decision regarding whether or not to provide consent; who should provide consent and who may sign off on an agreement; conditions, if any, under which the company may return to seek the same or similar activities in the event that consent is not obtained through the initial process; how information between the site and the indigenous groups will be shared in a way that allows them to fully understand the impacts being discussed; and how views from the wider indigenous community, including vulnerable members, will be sought, documented, and taken into account. Where administrative and traditional systems recognise different leaders, where leadership is known to be highly politicised and/or only marginally representative of the affected population or if there are multiple groups representing different interests, should rely on identification, recognition and engagement of greater numbers or representativeness of stakeholder sub-groups. If there is more than one indigenous community represented within the population that may be impacted and requiring a process of FPIC, they may be included in a single process, or separate processes, as desired by the people themselves.

A mutually agreed process for decision-making. Sufficient time for decision-making should be provided. A mutually agreed process for developing the. An should be developed collaboratively, following a structure and approach agreed in advance between the community and the company. Issues of particular significance to indigenous groups (e.g. cultural heritage, land rights, customary use of land and resources, water issues, access to resources where this might be blocked, protection of livestock, including migration routes, etc.) and mutual agreement on how engagement on these issues will be managed. Sites should involve the necessary expertise upfront to help identify, understand and advise on the management of these issues.

A mutually agreed baseline data-collection process and research ethics. This includes methods to be used for data collection and transparency and collaboration in the analysis and presentation of the data. Certain data-collection methods, such as interviews and photographing, may require informed consent from members of the community.

A mutually agreed grievance and dispute-resolution process (see Section 3B). The grievance process should be in line with traditional forms of problem solving and conflict resolution. Where the indigenous group is a small sub-section of a larger community, the grievance mechanism of the larger community may be deemed to suffice for the indigenous group to use. It is more likely, however, that a separate procedure is needed based on traditional problem-solving and dispute-resolution approaches. Administrative and legal recourse or remedies, and any legal aid available to assist the indigenous groups as part of the process of consultation and informed participation should be clarified. Dispute resolution may include mediation.

A mutually agreed process, frequency, and format of reporting on activities and progress against the agreed objectives and outcomes. A mutually agreed approach to resolve any capacity issues that may prevent the full and informed participation of members of indigenous groups, such as a lack of access to legal or technical expertise or language and literacy.
issues. The site should provide funding and/or help secure other means, including culturally appropriate training and educational activities, to meet capacity needs. In some cases, translation of documents may be required. In other cases, an explanation of document content or broader capacity building on certain specific issues may be needed. Provisions may be made for accessing independent advice. Staff may also need training to help them communicate and explain complex information using plain and non-technical language.

A mutually agreed process for reviewing and updating of the Community Engagement Plan, including frequency of review and any triggers for review outside of the planned timeline, such as a change to a project plan.

Sites must have sufficient capacity to engage with Indigenous Peoples and manage Indigenous Peoples-related issues. This can be ensured by hiring temporary or permanent experts with the necessary experience, knowledge and skills and/or by training site staff. Those hired to engage with indigenous communities should have an awareness and understanding of how to act with Indigenous Peoples; awareness of relevant national and international standards and legal requirements; knowledge and understanding of the local context; and ability to assist with the , including skills necessary to support specific work with indigenous groups.

The appropriate staff capacity should be in place before any engagement with Indigenous Peoples begins. Training of site staff who work or who are likely to spend time at the site/community or make decisions that have an impact on local indigenous communities should incorporate information about the following:

- engagement approaches and traditional dispute-resolution mechanisms;
- appropriate body language;
- initiating and ending conversations; culturally respectful and disrespectful actions;
- customs, traditions and cultural heritage;
- language;
- information about the history of the Indigenous Peoples, including discrimination;
- Indigenous Peoples' rights under international and national law;
- land ownership, land rights, land use: and
- any matters related to mixed indigenous/non-indigenous populations.

Where possible local indigenous men and women should be involved in the design and delivery of training.

Box 4I.5 Site capacity for engagement with Indigenous Peoples

Process for developing a Community Engagement Plan

Sites must contact the affected indigenous community and start engaging with them in order to develop the Community Engagement Plan. Where an indigenous community has a protocol in place for engaging with external parties, the site should contact and engage the community in accordance with the existing protocol. Note that the existing protocol does not replace the Community Engagement Plan. Where an existing protocol does not exist, sites may use the help of an appropriate third party to contact the community, ascertain from community leaders whether they wish to be engaged, and start engagements.

Where multiple indigenous communities are affected, sites may need to conduct discreet engagement processes with
each group or reach agreement with the relevant communities to participate in a joint process. Sites should, with the support of the indigenous adviser and in consultation with the affected community, also consider the best approach for engaging with indigenous groups if they are close to or part of a wider mixed community of indigenous and non-indigenous groups. In some cases it may be appropriate to develop an integrated approach, which addresses the needs of non-indigenous people but still respects traditional engagement methods for indigenous groups. The approach taken should always be determined in consultation with and according to the preferences of the affected communities.

The Community Engagement Plan can remain a stand-alone document or can be incorporated into the site's [SEP]. This will again depend, in part, on how mixed the community is and to what extent the indigenous community wants to be considered separately and have a separate engagement process. For example, a separate Community Engagement Plan is likely to be preferred if there are historical experiences of discrimination or exclusion of indigenous groups within a mixed community. The Community Engagement Plan can also be integrated into the [IPP] and/or any negotiated agreement or simply referenced in those documents, as agreed with the affected community.

If not incorporated within the document itself, a summary and reference to the Community Engagement Plan should be included in the [CEF]. Detailed planning (e.g. scheduling of specific meetings) and documentation of engagement activities should be incorporated into the site-wide integrated stakeholder database, which includes a stakeholder register, action planner/engagement schedule, consultation log and monitoring and evaluation framework.

Engagement forums
Sites are required to establish a Community Engagement Forum (CEF) (see [CEF]). Depending on the nature and size of the affected communities, a separate Indigenous Peoples Engagement Forum may need to be established; for instance, where the affected community consists of a large community with significant indigenous and non-indigenous populations. Where the affected population consists of non-indigenous populations and a small indigenous community, it may be possible to use the [CEF]. Where indigenous populations participate in the [CEF], respecting and following traditional approaches in terms of engagement and set-up should be considered, and the selection of Indigenous Peoples' representatives on the [CEF] should be transparent, even in cases when the traditional process of selection may not be. The wider indigenous community should know about the [CEF], its objectives, and who represents them on it.
TABLE 4I.1 Additional baseline data for Indigenous Peoples

- The national indigenous rights framework
- Historical and legacy issues
- Relationship with local and national authorities
- Relationship with other communities in the area
- Conflict and different interest groups within the indigenous community or between the indigenous community and other stakeholders (e.g. non-indigenous communities, companies and/or the state)
- Detailed map of the traditional and customary lands, geographic location of tangible culture heritage, and a land-use map
- Intangible cultural heritage and traditional knowledge
- Customs relating to land ownership, land rights, and property rights, including legal recognition of Indigenous Peoples’ rights to certain tracts of land; any displacement that blurs ownership and land-use rights; any historical disputes between indigenous groups claiming customary land ownership
- Levels and type of use of, and dependence on, natural resources
- Social structures and hierarchies, including the status and role of women, the young and the elderly.
Task 5 – Update SHIRA

DO phase is focused on updating and developing an Indigenous Peoples Plan and obtaining an agreement.

Potential impacts on indigenous people should be assessed and a summary of potential impacts and risks included in SHIRA.
Task 6 – Develop an Indigenous Peoples Plan

Contents in this section:
Task 5 – Update SHIRA
Task 6 – Develop an Indigenous Peoples Plan
Task 7 – Obtain and retain agreement Free, Prior and Informed Consent

Adverse impacts on indigenous groups should be avoided where possible. The primary purpose of the Indigenous Peoples Plan (IPP) is to outline culturally appropriate impact prevention and, where impacts on Indigenous Peoples are unavoidable, mitigation measures, as well as identify opportunities to maximise sustainable benefits to the indigenous community beyond the life of the mine.

An "is a mutually agreed plan that is shared between the site and the affected indigenous groups. An " is a collaborative process as much as a document. It is underpinned by engagement conducted according to the principles. The site should use an indigenous adviser to support the development of the IPP. Sites should also consider whether indigenous communities may need external assistance or capacity building to support and guide them in the process of developing the IPP.

In some cases, national legislation or legal precedent requires a site to develop a specific type of plan or negotiated agreement (such as an Impact and Benefit Agreement in Canada) to provide a legally binding mechanism for impact management and benefit sharing. These national requirements take precedence over, and may replace the IPP as long as they satisfy the principles and requirements of this section and any internal or external reporting requirements. If the scope of an agreement does not meet all of these requirements, sites can incorporate any necessary additional activities into a simplified SMP, or into the Social and Human Right Impact and Risk Analysis (see Section 3C) or Community Engagement Plan. The important thing is that the scope and objectives of these plans are agreed and understood by the site and affected indigenous groups.

Sites can integrate the IPP into the SMP, or, if that is not done, the Stakeholder Accountability Report (see Section 2) provides information to non-indigenous peoples that may be impacted and is not replaced by the IPP. The Stakeholder Accountability Report provides information to non-indigenous peoples and other stakeholders, as well as business risks to the site. Equally, the Stakeholder Accountability Report (see Section 2) provides information to non-indigenous peoples that may be impacted and is not replaced by the IPP. The potential impacts and controls identified in the IPP should be included in the Social and Human Right Impact and Risk Analysis (see Section 3C) and the site’s baseline workplace risk assessment and control register.

The exact scope and structure of the IPP may vary depending on the specific context, but should include the following components, discussed, developed and agreed between the indigenous community and the site:
Baseline information:
A summary of the socio-economic, health, education and environmental profile of the indigenous community, their circumstances, livelihoods, capacities, natural resources, social norms, tangible and intangible cultural heritage. The summary should also include natural features or objects that embody cultural values, social and economic structures, mechanisms and institutions, political and/or administrative structures and procedures, the position of the indigenous community within society, its relations with government and with other communities in the area, and national laws relating to Indigenous Peoples.

Impacts and opportunities:
An overview of potential impacts and opportunities and agreed culturally appropriate measures to mitigate adverse impacts and enhance opportunities and benefits, such as jobs, business opportunities, infrastructure development, and environmental protection and conservation. This should include targets with interim milestones and an agreed schedule and responsibilities for implementation.

Result of community consultation:
Description of all engagement to date, including process(es) where appropriate. An overview of issues raised by the indigenous groups, and how they have been addressed.

Natural-resource management:
Where applicable, this component sets out how the natural resources upon which the affected indigenous groups depend, and the geographically distinct areas and habitats in which they are located, will be conserved, managed and utilised.

Cultural heritage management:
Where cultural heritage of Indigenous Peoples is impacted, the Cultural Heritage Management Plan becomes part of the. The can also include actions around the enhancement of cultural heritage.

Costs, timeline, responsibilities:
A summary of costs of implementation of the including administrative costs and required project-specific budgets, timing of expenditures, responsibilities (between the site and the community) for implementing and monitoring the.

Monitoring, evaluation:
An overview of how the effectiveness of the will be monitored and evaluated. This should include participatory monitoring (see Task 7). Regular reporting on the implementation of commitments made in the and progress towards achieving the agreed objectives of the may be made through the or equivalent, as agreed with the affected community.

Review:
Frequency and timing of the review of the, as well as agreement on triggers for changing and improving the as needed outside the planned review timeline.
Task 7 – Obtain and retain agreement Free, Prior and Informed Consent

Contents in this section:
Task 5 – Update SHIRA
Task 6 – Develop an Indigenous Peoples Plan
Task 7 – Obtain and retain agreement Free, Prior and Informed Consent

The mutually accepted process for between the site and the affected indigenous groups is documented in the Community Engagement Plan. There must be evidence of an agreement where consent is given.

In cases where national legislation or legal precedent require a site to develop a specific type of plan or agreement, these national requirements take precedence over and may replace the agreement as long as they satisfy the requirements of this section and communities agree that they represent consent. If agreed with communities, the agreement may also be part of the ; however, the specific activities to which relates should be clear if contained within an , which is likely to also cover broader issues.

The agreement outlines the agreed terms under site activities can proceed. It must be signed or otherwise validated by legitimate representatives of both the site and the indigenous community, and typically includes the following provisions:

- commitments made by both parties
- description of site activities and (potential) adverse impacts
- duration of the agreement
- procedures for renewal, termination, renegotiation or withdrawal of consent
- a mutually agreed grievance/dispute-resolution process
- what might happen under possible future scenarios; e.g. if there are changes to the agreed site design and activities
- economic terms and conditions (e.g. compensation, benefit sharing)
- other terms and conditions as mutually defined or recognised.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Do
If consent is not given during the initial process, the site shall follow the indigenous community’s wishes regarding whether for the same or similar activities may be sought again later. Conditions for this should be outlined in the Community Engagement Plan. If consent is not given, the site must alert Group Social Performance in due time to jointly agree a suitable way forward.

An agreement is not the end of the process. Engagement with the indigenous community continues throughout the Life of Asset to ensure that commitments made are carried out and that consent is maintained and/or renewed as required.
Task 8 – Monitor and evaluate

A monitoring and evaluation framework should be developed for impact mitigation and benefit enhancement. It is best practice to develop the framework as part of the IPP, in collaboration with the indigenous community.

**TABLE 4.1 Monitoring and evaluation framework**

<table>
<thead>
<tr>
<th>Potential impact/opportunity</th>
<th>Controls</th>
<th>Target</th>
<th>Control owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation check</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness</th>
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</table>

- **Describe the potential impact or opportunity**
- **List the controls**
- **What are we trying to achieve?**
- **List function responsible for the control**
- **Date the control should start and be completed**
- **Human and financial resources needed to implement the control**
- **How do we know that the controls are being implemented?**
- **Outputs produced**
- **Changes that have occurred as a result of control**
- **Includes sources of verification**
- **Value and success in managing the impact**
- **Includes sources of verification**

**Example:**

**Loss of traditional knowledge and practices**

- **Establish/support existing community groups**
  - e.g. livelihood groups, women's groups, youth groups

- **Respect and protect indigenous groups traditional way of life**

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</table>
Participatory monitoring is mandatory where indigenous peoples may be impacted. Issues for participatory monitoring, indicators, and approaches to gather, analyse and report the monitoring data should be agreed as part of the Section 1 Governance.

Stakeholder feedback indicates appreciation for traditional knowledge and practices.
The final part of the Plan Do Check Act process is to make adjustments in the Community Engagement Plan, the IPP, SHIRA, and/or in...

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Task 9 - Adjust Contents in this section:
Task 9 - Adjust
Task 10 – Report
Results of monitoring and evaluating and any adjustments made to manage the relationship with indigenous people should be regularly reported to internal and external stakeholders through the Indigenous Peoples Engagement Forum, or equivalent structures as appropriate.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Act

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y Wky
Building and maintaining constructive and mutually beneficial relationships with indigenous communities will require a substantial investment of staff time and resources across multiple departments. The Social Performance team may lead in the engagement process, but other functions should also be closely involved. This involvement will vary as a site moves through the different stages, but the most critical departments are likely to be the most outward-facing, such as security, health, environment, human resources and supply chain.

### Lines of accountability

<table>
<thead>
<tr>
<th>ROLE</th>
<th>GROUP</th>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>PERSONALITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provides advice and input on how to meet Performance Standard 7 and relevant international good practice</td>
<td>Group Social Performance</td>
<td>Principal</td>
<td>Group Legal</td>
<td>IFC</td>
</tr>
<tr>
<td>Provides advice on how to proceed in case consent is not given</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Provides advice on international hard and soft law regarding Indigenous Peoples</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Acts as contact point with local and national government and relevant NGOs regarding site’s engagement approach</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Receives regular reports from site on development of engagement process</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Recruits external advisers/translators as necessary</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Oversees and assists external experts in the identification, mapping and analysis of Indigenous Peoples</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Co-designs and oversees overall consultation process, in collaboration with other community-facing functions</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
</tr>
<tr>
<td>Establishes protocols and mechanisms for consultation, in collaboration with community (and with assistance from external experts, as appropriate)</td>
<td>Group Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>IFC</td>
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### Table 4I.3: Roles and responsibilities

<table>
<thead>
<tr>
<th>COMPANY</th>
<th>LEVEL</th>
<th>PERSON</th>
<th>PERSONALITY</th>
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<tbody>
<tr>
<td>GROUP</td>
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<tr>
<td>Social Performance</td>
<td>Principal</td>
<td>Group Social Performance</td>
<td>Provides advice and input on how to meet Performance Standard 7 and relevant international good practice</td>
</tr>
<tr>
<td>Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>Receives regular reports from site on development of engagement process</td>
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<tr>
<td>Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>Recruits external advisers/translators as necessary</td>
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<td>Social Performance</td>
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<td>Site Social Performance</td>
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<td>Social Performance</td>
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<tr>
<td>Social Performance</td>
<td>Site Social Performance Manager or equivalent</td>
<td>Site Social Performance</td>
<td>Establishes protocols and mechanisms for consultation, in collaboration with community (and with assistance from external experts, as appropriate)</td>
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### Table 1.1: A k X

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</table>
Indigenous Adviser (temporary, early stage)

Indigenous Peoples Engagement Officer, or equivalent

Supports identification, mapping and initial analysis of Indigenous Peoples

Supports and advises on initial engagement with indigenous communities

Supports baseline data collection

Supports development of Indigenous Peoples Engagement Plan (IPP)

Supports internal and external capacity building as appropriate

Contributes to regular updates of stakeholder analysis as it relates to Indigenous Peoples

Maintains strong relationships with indigenous communities, through regular engagement

Supports implementation of the Indigenous Peoples Engagement Plan (IPP)

Identifies and suggests priority engagement topics and issues as they arise

Implements community grievance mechanism

Regularly reports on the implementation of the Indigenous Peoples Engagement Plan (IPP) and other engagement activities with indigenous communities

Monitors and reports on indigenous community perceptions

Direct involvement in engagement activities and risk and impact management as required

References

4J Conflict Management

4J.1 About conflict management

This section provides guidance on Conflict Management. A conflict management approach is required when other stakeholder engagement approaches have been unable to resolve an ongoing disagreement between the site and external stakeholders, and/or between external stakeholders (on an issue triggered by or relating to the site); and/or the disagreement has or could result in open expressions of hostility, aggression or withdrawal from engagement by external stakeholders.

Through the screening undertaken in Review and Planning (see section 2) sites are required to assess whether conflict issues require active management. Sites that “screen-in” the presence of or potential for conflict should then undertake further analysis, planning and monitoring of the issues.

Specifically, this section provides guidance on:

This section does not provide advice on security management to ensure the safety and security of employees, contractors or others for whom Anglo American has a duty of care. The requirements for security management are set out in Section 4E Security Management and the Voluntary Principles on Security and Human Rights. The section also does not provide advice on operating in conflict zones marked by armed conflict and war.

Intended users

The intended users of this section are primarily the site’s Social Performance team, which typically has the lead conducting a detailed conflict analysis, notably the context for conflict, its root causes and contributing factors, the characteristics of the parties to a conflict, and the dynamics of conflict skills and organisational capabilities required to manage conflict approaches and methods to respond to conflict monitoring, evaluating and reporting on conflict internal management and resourcing for conflict management.
responsibility for engaging with stakeholders who may be in a conflictual relationship with the site or who may be part of an external conflict triggered or exacerbated by the site’s presence or activities.

It should be recognised, however, that stakeholder engagement and the identification of conflict-related social and human rights impacts and risks are collaborative processes. Therefore, other functions, such as Government Relations, Human Resources, Security, Supply Chain, Legal, and Safety and Sustainable Development (S&SD), may also find this section useful.

Relevance to other sections

Conflict management is interconnected with and supported by other components and sections of the Social Way Toolkit:

Governance (Section 1)
This section provides guidance on the leadership, accountability, systems and structures to manage social performance in a cross-functional manner, including relevant team structures, skills and responsibilities (conflict-related specifics included in Task 2). It also includes a summary of the required monitoring and evaluation framework (conflict-related specifics included in 4J Guidance, Task 6). Actions developed as part of conflict management may have implications for the social performance staffing and budgeting (defined in Governance). Conflict management may require input from multiple functions and the Social Performance Management Committee (SPMC) should contribute in this respect.

Review and Planning (Section 2)

An overview of conflict should be included in the site’s external-context review.

Engagement and Analysis (Section 3)

A. Stakeholder Engagement – regular engagement and consultations with external stakeholders are crucial in conflict management and should be conducted in a manner that considers the context of the conflict so as not to exacerbate or contribute to it.

B. Social Incident and Grievance Management – the grievance management process provides a tool for identifying and tracking issues that could present a risk of conflict with or between external stakeholders.

C. Social and Human Rights Impact and Risk Analysis – potential conflict-related impacts and risks should be assessed as part of SHIRA.
4J.1 About conflict management

What is conflict?

Conflict is defined as fundamental disagreement between two or more parties due to contrasting interests, values or needs. Conflict may be latent, not acted upon, or only express itself when it takes the form of an explicit dispute. Violence is just one of the ways in which conflict can manifest itself.

Conflict is an ongoing situation that has not been resolved and cannot be resolved through conventional stakeholder engagement, and/or has resulted in open expressions of hostility, aggression or withholding of engagement by external stakeholders. The tools set out in this section should be applied in cases where there are manifestations of conflict as described here, or where there is an indication that the potential exists for such manifestations to develop.

Conflict can have constructive or destructive roots as well as constructive or destructive outcomes. A possible outcome of conflict is a dispute, but conflict can also result in reconciliation, avoidance or compromise. A timely and constructive response to conflict can result in more positive outcomes.

What is the difference between conflict and disputes?

Conflict is an ongoing state of disagreement between two or more parties. A dispute is an expression of conflict at a point in time and can be addressed through a variety of measures, ranging from avoidance to negotiation, arbitration, legal adjudication or the use of force.

Conflict-management responses

Potential responses to conflict vary greatly. Some responses may reconcile any differences between parties, while other responses raise the level of conflict. The following are typical conflict-management responses:

- Controlling:
  This response is characterised by force and aggression and is typically used when conflict is seen as a contest with a winner and loser. It can lead to escalation of conflict when the loser resents the outcome, is hurt, or seeks to strike back at a later point.
Conflict sensitivity refers to the structures, culture and capabilities within an organisation to understand conflict in the context within which it operates, to understand how its operations impact or generate situations of conflict, and its capacity to effectively respond to conflict in ways that mitigate negative consequences and enhance positive ones.

Conflict as an impact to stakeholders and a risk to the business

Conflict can present a risk to the business where it causes a threat to a site's reputation, production, finances or the health and safety of workers. A site can also introduce or exacerbate conflict into an area owing to its presence and/or activities, thereby affecting external stakeholders; this can manifest in conflict between different groups within a community (intra-community conflict) or between different communities (inter-community conflict). Such a situation could in turn present new risks to the site.

Conflict between external stakeholders that is not caused or exacerbated by the site (for example where there is conflict between different stakeholder groups related to poverty, social and political marginalisation, injustice, corruption or power) can cause difficulties for the social performance team in completing its day-to-day work. For instance, where external stakeholders refuse to work together or where institutions are not functioning owing to internal conflict, this may affect a site's ability to conduct stakeholder engagement activities or implement mitigation measures and socio-economic development projects. Conflict between external stakeholders can also influence their perceptions and expectations, which can lead to grievances or incidents affecting the site e.g. stakeholders may protest if one group perceives another has greater access to benefits and/or one group is receiving benefits another group believes they are not entitled to.

Where conflict is exacerbated or caused by the site, this should be understood as an adverse impact to external stakeholders. Examples of the types of site activities that can cause or exacerbate conflict with external stakeholders are as follows:

- Avoiding: This style is reflected in (one or more of) the parties physically or emotionally withdrawing from conflict in order not to hurt any other parties. This style can leave conflict unresolved.
- Accommodating: With this approach, there is significant concern about maintaining relationships. Disagreement is ignored or smoothed over, conflicting views are not articulated. A message of “peace at any cost” prevails, with the conflict not being resolved.
- Compromising: This approach, while commonly used, provides a short-term fix instead of a long-term solution, and can leave parties experiencing a lack of satisfaction and a sense of loss. Compromise with one group of stakeholders on an issue can also risk creating issues with other stakeholders who may perceive a lack of fairness.
- Reconciling: This approach often refers to dispute resolution and conflict management undertaken by the parties to a conflict without the use of a third-party facilitator or mediator. It is when the parties to a conflict mutually work to resolve issues of dispute between them and do so in a way that is based on a common understanding of the facts, laws and regulations, and seeks to create a foundation for future collaboration.
- Problem-solving: This is a process based on mutual respect and consent aiming to find solutions that are beneficial to all parties. Although time-consuming, it is the best way to arrive at solutions that are fair, long-lasting and provide significant gains for the conflicting parties.

Hiring and procurement: Local employment and procurement practices can raise local community expectations.
The above adverse impacts on communities can also be sources of risks to the business. The following risks to the business can apply to sites operating in a context of conflict:

- **Lifecycle planning**
  - The potential for conflict in the context of a mine site is not always apparent. Few greenfield sites are developed in areas of apparent conflict because of the associated risks. Conflict can arise at all stages of the asset lifecycle, particularly where there are significant changes and ramping up and down of site activities or due to a volatile or rapidly changing external context. The potential for conflict should therefore be reviewed throughout the life of asset and measures should be taken to mitigate it.

- **Land access, displacement and resettlement**
  - Economic and/or physical displacement can disrupt existing community structures, deepen power imbalances within a community, cause tension between resettled and host communities, and cause resentment between those being resettled and those that are not. A site's need for land reduces land availability for the community and can lead to land speculation and increased competition over the remaining available land in the area.

- **Site-induced migration**
  - Site-induced migration can result in competition over benefits, including local employment and procurement opportunities between ‘local’ and ‘non-local’ groups. The arrival of migrants can disrupt local communities, place pressure on local infrastructure/services and the environment, increase competition for land and access to natural resources, and can increase social ills including the risk of sexual and gender-based exploitation and violence (including prostitution).

- **Stakeholder engagement**
  - Poor communication and engagement approaches with external stakeholders, including non-inclusive engagement practices, can lead to frustration and hostility. Poor engagement can also limit the ability of sites to fully understand risks and impacts, and could therefore limit the ability to effectively anticipate and manage conflict.

- **Security**
  - Military or police involvement in site security management and presence and actions of contracted private security can cause tension with local communities but may also play a role in mitigating conflicts.

- **Environmental impacts**
  - Adverse environmental impacts and associated potential health impacts, or the perception thereof, can result in resentment. Environmental impacts can also change inter- and/or intra-community access to natural resources.

- **Financial**
  - Increased operational costs owing to increased protection of site infrastructure, including the installation of security equipment and/or increase in the number of security staff; an increase in insurance costs; and material losses from destruction of site property or materials.

- **Production**
  - Failure to achieve production targets owing to disruption of planned activities or production.

- **Safety**
  - Threats to the physical security and well-being of employees.

- **Legal**
  - Lawsuits against perpetrators of violent acts.

- **Reputation**
  - Damage to Anglo American’s reputation by being associated with conflict. Such association can result in weakening of the licence to operate, undermining stakeholder trust and/or consent, and the inability to attract or retain competent staff.
be developed to avoid and manage conflict as needed. Requirements for conflict management remain unchanged as the site moves into closure and post-closure. Sites should analyse and address potential for conflict arising from social transition as part of operational planning and as part of the Closure Risk Assessment (which is informed by a Closure Social Impact Assessment when sites are five years from closure). This includes understanding the potential for conflict arising from:

- Post mining land uses: if there is inadequate or non-representative stakeholder participation in the options analysis for post mining land uses there may be a risk of fundamental disagreement over the selected option, or, certain options could be perceived to favour one stakeholder/stakeholder group causing resentment.
- Historical legacies of mine-stakeholder relationships: if commitments are left unfulfilled or legacy impacts are not adequately addressed (whether this is real or perceived).
- Long-term socio-economic development activity: real or perceived inequalities associated with activities aimed at establishing sustainable post-mining livelihoods.
- Changes in employment and procurement: large scale redundancies and decrease in procurement activities as operations cease.

The conflict management response and Conflict Management Plan, if required, should be integrated into the social component of the preliminary, draft and final Closure Plan (see MCT Tool 2).
The following sections provide a step-by-step guide to Conflict Management and should be applied by the sites when the need for Conflict Management is screened in during the Review and Planning process. Anglo American’s Social Way follows the Plan Do Check Act (PDCA) management process. The guidance in this section is structured accordingly.

1. Undertake a conflict analysis
2. Assess site’s conflict sensitivity and conflict management capacity
3. Update SHIRA
4. Determine conflict management approach
5. Develop a Conflict Management Plan
6. Monitor and evaluate
7. Adjust
8. Report

**Plan Do Check Act (PDCA) Cycle as Relevant to Conflict Management**
Task 1 - Undertake a conflict analysis

Contents in this section:

Task 1 - Undertake a conflict analysis
Task 2 – Assess site’s conflict sensitivity and conflict management capacity

The plan phase focuses on gathering information to assess the context of conflict, the potential social and human rights impacts and risks related to conflict, and to develop a Conflict Management Plan (CMP).

Task 1 - Undertake a conflict analysis

Sites should undertake a conflict analysis to understand the nature and extent of existing conflict and conflict dynamics or the potential for future conflict. Conflict analysis is a structured process aimed at identifying and analysing conflict issues, patterns and trends in order to determine the appropriate response. Sites should consider the need for external expertise when completing a conflict analysis.

There are four elements to undertaking a conflict analysis: analysing the external context and identifying issues; identifying causes, drivers, and triggers; analysing the parties to the conflict; and identifying conflict dynamics. These are depicted in Figure 4J.2.

Where a site may be experiencing multiple conflicts, these elements should be repeated for each situation identified because the conflicts may have distinct characteristics. The outcomes of the conflict analysis should be documented in the external-context review (see Section 2).

PLAN
4. IMPACT AND RISK PREVENTION AND MANAGEMENT
Plan
Analyse the external context and identify issues. Sites should analyse the external context to establish if there are any issues that may cause, drive or trigger conflict. Table 4J.1 explains the concepts of root causes, drivers, triggers and manifestations of conflict.

Table 4J.1 Conflict causes, drivers, triggers and manifestations

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Structural or root causes</td>
<td>Pervasive factors that have become built into the policies, structures and fabric of a society based on underlying social interests, rights, values, information, relationships and institutional structures.</td>
<td>Illegitimate or weak governance, lack of political participation (or specific exclusion) of particular groups, lack of (or inequality in) economic and social opportunities, marginalisation of women or minority ethnic groups, inequitable access to land and resources, systemic corruption, lack of effective engagement and communication, poor or contested leadership, community disunity, human rights abuses, availability of light weapons.</td>
</tr>
<tr>
<td>Drivers of conflict</td>
<td>Factors (relating to the immediate social, political or economic environment) that are symptomatic of the root causes and contribute to a climate conducive to conflict or its escalation.</td>
<td>Political: elections/change of government, arrest of key leader, behaviour of political actors. Environmental: competing access to land or water; increased access to area; environmental disaster; increased food scarcity. Operational: expansions, downsizing or contracting-out. Economic: scarcity of basic commodities, capital flight, unemployment, disputes over distribution of benefits. Demographic: growing population, out- and in-migration. Site related impacts: security arrangements, resettlement and compensation policies.</td>
</tr>
<tr>
<td>Triggers</td>
<td>Single acts, events, or their anticipation that will set off or escalate conflict – these may be political, environmental, operational, economic or demographic.</td>
<td></td>
</tr>
</tbody>
</table>
Manifestations

**The (visible) expression of conflict.**

Sites should review the external context to identify issues associated with conflict. In doing so, they should be guided by the following questions and consider whether the issues have or could lead to fundamental disagreements between two or more parties within the context of the site. External expertise may be required to complete this task.

Compile an overview of conflict and potential for conflict in the external context, highlighting the issues and how they may cause, drive or trigger conflict.

**Analyse causes, drivers and triggers**

Sites should build on the initial identification of potential conflict issues and conduct an exercise to better understand the root causes, drivers, triggers and manifestations of the conflict. Getting to the root causes of a conflict is key to understanding and responding to it. Sites can use visual tools such as the iceberg (see Figure 4J.3) or the Conflict Tree (see Figure 4J.4) as part of the exercise. This exercise to analyse drivers, root causes and triggers should be repeated as needed to understand different conflict situations and/or to understand conflict between multiple groups.

The image of an iceberg helps to show that while only the manifestation of conflict is visible, i.e. above the surface, the root causes, drivers and triggers of conflict may not be visible, i.e. lie below the surface, out of sight.

**Police, military or security action**

**Violent and non-violent protests**

**Boycotts**

**Petitions**

What are the existing or emerging political, economic, environmental, or social issues or events that may cause, drive or trigger conflict? These could include, for example, elections, government-reform processes, leadership contestation, economic recession, unemployment, in-migration, drought and flooding. Can these issues lead to fundamental disagreements between two or more parties? If so, how might this manifest?

Are there specific geographical areas relevant to the site prone to conflict? If so, describe these. These could, for example, include areas around the location of natural resources, key infrastructure and lines of communication, pockets of socially marginalised or excluded populations. Can disagreements about these areas cause fundamental conflict between two or more parties? If so, how might this manifest?

Is there a history of conflict, or current manifestations of conflict? If so, describe these and how they were responded to. What were the significant events in the conflict, what were the manifestations of the conflict, is it possible to discern the underlying causes, drivers and triggers of the conflict, and what methods were used to respond to the conflict?
FIGURE 4.3 THE ICEBERG

The Conflict Tree is a visual tool to facilitate an exercise to identify the root cause(s) and manifestations of conflict. The Conflict Tree exercise is ideally conducted in a group, which can include members of both parties to a conflict.

FIGURE 4.4 THE CONFLICT TREE

Analyse parties to conflict

Sites should follow the steps below to identify and analyse the parties to existing or potential conflict. The parties to
The identification and analysis of the parties to conflict should build on the initial identification of stakeholders conducted as part of the stakeholder mapping process (see Section 3A). The results should be integrated into the site's stakeholder register and be considered in the site's Stakeholder Engagement Plan and Social Management Plan (see Section 3A and Section 2 as required).

Sites should identify the parties to a conflict through the following questions:

- Understand positions, interests, needs and capacities
  - Sites should clarify and document the positions, interests, needs and capacities of each of the parties to a conflict, and identify differences and areas of overlap:

- The positions, needs and interests of the parties can be mapped to show where the parties diverge and where they have
- Who are the main stakeholders in conflict, and what are the relationships between them? Divide the parties into the following categories:

  - Primary parties: these parties oppose one another, are hostile and have a direct interest in the outcome of the conflict.
  - Secondary parties: these parties have an indirect interest in the outcome, are often allied or sympathetic with primary parties, but they are not direct adversaries.
  - Third parties: these are players such as facilitators, mediators, arbitrators or adjudicators who might intervene to facilitate resolution of one form or another.

- Which actors can be identified as possible spoilers; namely, individuals who actively seek to cause conflict or undermine efforts at conflict management? Why? What are their incentives; e.g. groups benefiting from a lack of change, leaders or authority figures who may feel undermined?

- Positions:
  - These are the demands parties make or the outcomes they seek. For example, a site may propose to resettle a community in order to expand operations. This is the mine's position. The community, in turn, may not wish to move. This is the community's position.

- Interests:
  - These are what the parties want to achieve to meet their respective needs. In the resettlement example, the site's interests include expanding operations and securing access to the land they require to achieve this. The interests of the community include retaining their connection to the land and the economic, social, cultural and psychological benefits it provides.

- Needs:
  - These are what each party requires to sustain itself. Needs can be objective or subjective. In the resettlement example, the site's needs include maintaining a certain return on investment. The community's needs include sustaining their livelihoods and a sense of community.

- Capacities:
  - In this context, capacity refers to the party's potential to influence whether violence occurs or not. Consider their economic resources, access to power, social networks, and cultural barriers. Consider gender dynamics and whether men and women have different capacities in this regard.
While parties may differ in their positions, they might have certain interests or needs in common. Understanding what the commonalities are forms the basis of pursuing resolution of differences.

Sites should map the parties to a conflict based on an understanding of their positions, interests, needs and capacities. Examples of mapping techniques are shown in Figures 4J.5 and 4J.6.
Another aspect of conflict analysis is to understand the character and trends, or dynamics, of the conflict, which can change over time. The dynamics of conflict are the result of the interaction of the issues identified in the external context analysis; causes, drivers and triggers analysis; and analysis of parties. Understanding the dynamics enables the identification of different scenarios of (violent) conflict occurring. The key questions to answer are:

1. What are the current trends? Is there an escalation or de-escalation of tensions? Are major changes in the context background, causes/drivers/triggers, actors or interaction between them positive or negative?

2. What factors are likely to prolong violence/conflict if it occurs? E.g. potential for radicalisation, involvement of the Armed Forces, lack of outside intervention.

Based on the analysis, scenarios can be built: 1) the best case, where the current situation leads to a positive outcome, 2) a middle ground where the status quo is maintained without significantly positive or negative changes, 3) a worst case, where current trends develop into a negative outcome. These should be an assessment of likely developments based on what is known about the current context from the conflict analysis. Dynamics are likely to be affected by trends going back many years (the conflict timeline) and in certain cases a historical analysis may be useful to gain a deeper understanding of current developments.

A conflict timeline and conflict path are tools that can be used to help to identify the conflict trends and opportunities for resolving conflict.

**Conflict timeline**

The conflict timeline can help to illustrate historical phases of a conflict and can be used to facilitate understanding of the conflict dynamics over time. Sites should outline the perspectives of each of the parties to a conflict over time and in relation to specific events in order to understand the different perceptions on the course of events, and to clarify what are seen as the most significant events by each of the parties. An example is provided in Figure 4J.7.

Where possible, bringing external stakeholders associated with the conflict in to generate and discuss the timeline, with the help of a neutral third party if needed, can help in building a common understanding and basis for managing conflict and resolving disputes.
Identify the conflict path

The conflict path describes the level of intensity the conflict goes through over time from its causes, to factors that may aggravate it, those that may moderate it and to its outcome, either positive or negative. A conflict path can be used as an illustrative tool to plot how conflict increases or decreases in intensity along a timescale and can help structure planning around the conflict management approach. Sites should draw the conflict path of the conflict(s) they are a party to in order to understand where in the process of conflict development and resolution they potentially find themselves. This understanding will assist in developing their strategy to respond to the conflict. Detailed guidance on developing the strategic response to conflict is found in Task 3 Determine Conflict Management Approach.

An example of a conflict path is provided in Figure 4J.8, illustrating a positive outcome, which may not always be the case.
FIGURE 4J.8 AN EXAMPLE OF CONFLICT PATH


Task 2 – Assess site’s conflict sensitivity and conflict management capacity

Sites needing to address conflict must have the capacity and skills to manage it. Conflict sensitivity refers to the organisational structures, culture and capabilities of each site to understand conflict in its operational context, to understand how its operations impact or generate situations of conflict, and its capacity to effectively respond to conflict in ways which mitigate negative consequences and enhance positive ones.

Use the detailed Organisational Conflict Sensitivity and Capacity Assessment Tool (which can be found in the Tools section and is described below) to assess the site’s sensitivity to conflict, as well as its capacity to manage conflict. This is a self-assessment tool focused on assessing a site’s commitment, human resources and the integration of conflict sensitivity into the site activities and the asset lifecycle.

Undertaking a self-assessment will allow the site to identify its potential opportunities and constraints in dealing with conflict. From this assessment it will be possible to identify priority issues, set objectives and take action to improve conflict management capacity and skills. The outcomes of the assessment should be reviewed by the and considered in addition to wider social performance resourcing as outlined in the Governance section (see Section 1).

A plan for building such capacity will form part of the Conflict Management Plan, as described in Task 5.

This self-assessment will benefit the site by encouraging senior management to prioritise conflict sensitivity, raise levels of awareness and sensitivity among participating members of staff, allow existing knowledge of conflict issues and responses to be exposed, and open opportunities for improved practice and change.

The method for undertaking the self-assessment should be determined as appropriate for the site. Various techniques can be used to gather information, including surveys, focus group sessions, interviews and document reviews.

The process could be designed and facilitated by selected members of staff or by an external consultant. External expertise is recommended when potential impacts and risks associated with conflict are significant and when sites...
Through the self-assessment, the site will compile information and perspectives on its conflict sensitivity strengths and weaknesses. Based on this, the site, either internally or working with external support, should:

- Building on this, the site should draft a plan for change, which identifies detailed actions to work towards each agreed objective for change. As part of the Conflict Management Plan (described further in 4J Guidance, Task 5), this plan should set out what needs to be done, how this should take place, by whom, by when, indicators of performance and resources required.

- Every effort should be taken to build on existing policies, systems and procedures. Implementation of the plan should be monitored and progress towards objectives evaluated.

- It is recommended that a designated Conflict Management Co-ordinator is appointed at sites managing situations of actual or potential conflict. This does not need to be a standalone role but can be integrated into the responsibilities of an existing, senior member of the social performance team, as appropriate. The areas of responsibility of a Conflict Management Co-ordinator are outlined in Table 4J.5 under Management and Resources.
Task 3 – Update SHIRA

Based on the results of Task 1 and 2 and the internal and external-context review (see Section 2), sites should assess conflict-related impacts and risks, and associated prevention and mitigation measures, as part of Social and Human Rights Impact and Risk Analysis (SHIRA).

Conflict-related risks and impacts and the approach to managing these risks and impacts should be incorporated in the Conflict Management Plan (see 4J Guidance, Task 5) and the Social Management Plan (SMP), as appropriate (see Section 2).

Further examples of conflict-related risks and impacts that can apply to sites in a context of conflict are included in Table 4J.2. Tailored responses to these impacts should be developed on a case by case basis, based on a thorough understanding of all dimensions of the conflict within the context.

### Table 4J.2 Example of potential impacts and risks related to conflict

<table>
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<tr>
<th>Impact category</th>
<th>Potential impact</th>
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<tbody>
<tr>
<td>Economic</td>
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<tr>
<td>Personal and political security</td>
<td>Site employment and procurement processes result in significantly higher employment rates of one population group compared to another population group, thereby aggravating the existing conflict in the community.</td>
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<tr>
<td>Socio-cultural networks</td>
<td>Exclusion/lack of participation of youth in site engagement activities in a local context with high youth-unemployment rates results in youth not feeling respected and heard by the site, manifesting itself in violent riots directed at the site.</td>
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<tr>
<td>Site-induced migration</td>
<td>Site-induced migration disrupts traditional leadership structure as non-local in-migrants do not respect local traditional leaders, causing conflict between locals and in-migrants.</td>
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**4. IMPACT AND RISK PREVENTION AND MANAGEMENT**

Do

\[
\begin{align*}
\text{Task 3} & \quad \text{Update SHIRA} \\
\end{align*}
\]
<table>
<thead>
<tr>
<th>Impact category</th>
<th>Potential impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community health and safety</td>
<td>Non-resettled household members set fire to the resettlement houses of resettled households because of disagreement over resettlement benefits, including resettlement houses that are more luxurious than the houses of non-resettled households.</td>
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<tr>
<td>Risk</td>
<td>Damage to the reputation of Anglo American related to its association with conflict, evidenced by coverage of the conflict in national and international newspapers.</td>
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<tr>
<td>Safety</td>
<td>Threats and/or injury to site staff conducting activities in the community, caused by opposing party to a conflict with the site.</td>
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<td>Financial</td>
<td>Increased operational costs owing to increased protection infrastructure, including the installation of security equipment and increase in the number of security staff needed to protect the site.</td>
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<tr>
<td>Production</td>
<td>Failure to achieve production targets owing to violent protests disrupting planned (expansion) activities or production.</td>
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<tr>
<td>Legal</td>
<td>Lawsuit against Anglo American for allegedly colluding with one party to a conflict.</td>
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</tbody>
</table>
Assuming that conflict, or the potential for conflict, has been identified, and conventional stakeholder engagement activities have been unable to prevent it, there is a wide range of possible approaches to respond, which can be placed on a continuum, from negotiation to violence, as illustrated in Figure 4J.9. The further to the right-hand side of the continuum, the greater the potential for outcomes to be based on coercion or force, and for the outcomes to reflect one side ‘winning’ and the other ‘losing’ – these represent unacceptable and unsustainable outcomes and such approaches should therefore be avoided.

The approaches of negotiation, facilitation, mediation, arbitration and adjudication are detailed in Table 4J.2. Forced decision-making is not considered because, as noted this is not an appropriate response to adopt as it does not align with our Purpose and values as an organisation and does not address causes of conflict. The table sets out a range of criteria for consideration when deciding on which conflict-management approach is most appropriate, including the desired result, whether the process is voluntary or involuntary, the role of third parties, and advantages and disadvantages of the approach.
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### Table 4J.3: Comparative table of approaches to conflict management

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<thead>
<tr>
<th>Structure</th>
<th>Participants</th>
<th>Result sought</th>
<th>Advantage</th>
<th>Disadvantage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private</td>
<td>Party</td>
<td>Mutually agreed outcome</td>
<td>Agreement enforceable as a contract, if opted for by the parties</td>
<td>Can be quicker and provide a mutually acceptable solution</td>
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<tr>
<td>Involuntary</td>
<td>Mediator and parties</td>
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<tr>
<td>Public</td>
<td>Adjudication (litigation)</td>
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<tr>
<td>Voluntary</td>
<td>Mediator and parties</td>
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<tr>
<td>Adversarial</td>
<td>Arbitrator and Court judgment</td>
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### Adversarial
- Structure: Determined rules
- Participants: Adversarial
- Result sought: Binding or non-binding
- Advantage: Can be quicker and provide a mutually acceptable solution, application of court and legal rules
- Disadvantage: More formal than mediation

### Non-adversarial
- Structure: Unstructured
- Participants: Usually informal and flexible
- Result sought: Mutually agreed
- Advantage: Can be quicker and provide a mutually acceptable solution
- Disadvantage: Can be intimidating for stakeholders, may be unpredictable, and stakeholders may regard the process as unfair

### Mediation
- Structure: Flexible
- Participants: Non-binding, parties may set the ground rules
- Result sought: Mutually agreed
- Advantage: Can be quicker and provide a mutually acceptable solution
- Disadvantage: Less formal than adjudication

### Facilitation
- Structure: Flexible
- Participants: Non-binding, facilitator can be used as a last resort
- Result sought: Mutually agreed
- Advantage: Can be quicker and provide a mutually acceptable solution
- Disadvantage: More informal and flexible than mediation
Negotiation, Facilitation, Mediation, Arbitration, Adjudication (litigation)

Disadvantages
The process of negotiating, facilitating and/or mediating a successful outcome to conflict is based on key preconditions. The parties need:

- Quicker and cheaper than adjudication or legal solution
- Parties retain control over process and outcome
- Parties work together to find win-win solutions
- Decisions can be tailored to needs of parties
- Agreements more likely to be implemented and future problems solved in non-adversarial way

This method may not be suitable for complex cases. Failure to implement agreement may necessitate enforcement through courts (where agreement is enforceable as a contract) or may require another conflict approach to be taken.

Parties relinquish control over final decision. Success depends on competence of arbitrators. Depending on the legal regime applying, there may be limited opportunity to appeal or seek a formal review of an arbitration award.

Initial outcomes of legal proceedings may result in appeals or further litigation. Decisions are restricted to narrow legal parameters and may not include guidance on matters such as future constructive relationships between the parties. Parties relinquish control over process and decision. Inappropriate for disputes involving broader social issues or matters of fairness not reflected in law.

To conduct negotiations in good faith (see Box 4J.2) a clear commitment to reach agreement to believe that negotiation, facilitation and/or mediation is the best response to the state of conflict.
The following questions can be used to evaluate whether the agreement reached is successful:

- A transparent mandate from a clearly identified constituency to recognize their opposing party as a negotiating partner
- To commit to mutually agreed ground rules
- To acknowledge that there are legitimate differences and commonalities between the conflicting parties
- Capacity to fulfill the terms of the agreement reached.

- Does the agreement satisfy the legitimate interests of the parties as much as possible and resolve conflicting interests in a fair and just manner?
- Does the agreement advance the relationships between the parties?
- Can the parties implement the agreement?
- Do all the parties to the agreement own it?
- Do the parties believe that the agreement was not imposed on them and that they have not been manipulated into accepting it?
- Do the broader constituencies who the parties represent find the agreement acceptable?
- Is the agreement coherent, unambiguous and implementable within an acceptable period?
- Is there provision for the agreement to be amended and improved should it be found to be unsatisfactory?

The term good-faith negotiation is widely used as a principle to guide engagement with Indigenous Peoples (see Section 4I). It is also used in the practice of mediation and conflict management. The following principles guide the approach to negotiating in good faith:

- Involve legitimate representatives
- Ensure willing engagement, free from coercion or intimidation
- Ensure mutual respect and sensitivity to cultural and other differences
- Parties respect each other’s decision-making processes, and constraints
- Use participatory approaches
- Conduct joint exploration of key issues of importance
- Provide flexibility and consideration of multiple options
- Be willing to compromise
- Provide information needed for informed negotiation
- Agree mutually acceptable procedures for negotiation

Box 4J.2 – Negotiating in good faith!
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Task 5 – Develop a Conflict Management Plan

Contents in this section:

Task 3 ‒ Update SHIRA

Task 4 - Determine conflict management approach

Task 5 – Develop a Conflict Management Plan

Where (potential) conflict-related impacts and risks are significant, sites should develop a Conflict Management Plan (CMP) with support from Group Social Performance and external experts as required. A stand-alone ensures continued focus on and a comprehensive approach to be taken to conflict management although it may be appropriate to include the as a sub-section of the overall (see Section 2). Sites may also choose to include the as an Annex to the.

Key conflict-related impacts and risks and associated responses should be included in the. The should also include approaches to increase internal capacity to manage conflict, building on the results of the organisational conflict sensitivity and capacity assessment (see 4J Guidance, Task 2). An outline for a is provided in Tools. The plan should be revised annually.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Do
A monitoring and evaluation framework should be developed for conflict-related impact and risk mitigation. As part of the implementation of controls, their effectiveness should be evaluated, so that corrective action can be taken where needed. An example is provided in Table 4J.4.

Long-term objectives identified as part of Review and Planning (see Section 2) may also relate to conflict management, in which case a monitoring and evaluation framework should also be developed to track progress against the long-term objectives (see Section 2).

<table>
<thead>
<tr>
<th>Potential impact/risk</th>
<th>Controls</th>
<th>Target</th>
<th>Control owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation check</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness/impact of the control/project</th>
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<tbody>
<tr>
<td>Example: Risk of business disruption due to protest as stakeholders no longer participate in conventional site stakeholder engagement activities owing to perceptions of adverse site impacts (conflict trigger).</td>
<td>Process of mediation</td>
<td>Zero</td>
<td>Staff time spent in mediation process</td>
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parties are satisfied that agreement is being implemented.

engagement activities.
The final part of the process is to adjust the controls for risk and impact mitigation as necessary, based on the monitoring and evaluation conducted, and adjust the **ACT PDCA CMP SHIRA** accordingly.
Results of monitoring and evaluating and any adjustments made to manage conflict-related risks and impacts should be regularly reported to internal and external stakeholders through the Community Engagement Forum (CEF) or equivalent structures, as appropriate.
Table 4J.5 Internal roles and responsibilities in managing conflict

<table>
<thead>
<tr>
<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>GROUP</td>
<td>Social Performance Principal</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>BUSINESS UNIT</th>
<th>Head of Corporate Affairs and/or Government Relations Manager/</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITE</td>
<td>SP Manager</td>
</tr>
</tbody>
</table>

| SP         | Designated Conflict Management co-ordinator (may co-ordinating role in: |
|           | Provides advice and input on how to fulfil and implement the conflict-management approach |
|           | Acts as contact point with regional and national authorities (where relevant) |
|           | Provides guidance on relevant legislation and regulations concerning conflict-management approaches |
|           | Co-ordinates planning with regional authorities where relevant |
|           | Receives regular updates through quarterly reports |
|           | Facilitates coordination with BU |
|           | Oversees conflict analysis |
|           | Oversees conflict sensitivity and capacity self-assessment |
|           | Participates in internal and external engagements as needed |
|           | Provides guidance for and reviews the CMP |
|           | Reviews monitoring and evaluation results |
|           | Reports on conflict management at SPMC meetings, as required. |

1. IMPACT AND RISK PREVENTION AND MANAGEMENT
2. 4J Conflict Management
3. 4J.3 Management and resources
4. 4. Contents in this section:
5. 4J.1 Introduction
6. 4J.2 Guidance
7. 4J.3 Management and resources
8. 4J.4 Tools
COMPANY LEVEL

PERSON

ROLE

not be stand-alone role)

Data collection

Planning

Implementation

Monitoring Reporting

RELEVANT FUNCTIONS

Human Resources, Supply Chain

Security and Protection Services

Environment

SITE HEADS OF

Heads of Departments, especially:

SITE MANAGEMENT

General manager and Social Performance Management Committee

Collates internal and external context information

Consults stakeholders to assess potential impacts

Assesses potential and actual conflict-related impacts

Co-ordinates with HoDs on key impacts and prevention and mitigation measures

Engages relevant stakeholders on key impacts and prevention and mitigation measures

Develops and updates the CMP

Confirms actions together with HoDs

Undertakes engagements related to conflict management

Oversees implementation of the CMP

Tracks impacts and risks and associated controls related to conflict

Adapts, based on monitoring results and community feedback

Provides reports of to GM, HoDs and SPMC

Implements relevant controls related to conflict triggers associated with hiring and procurement

Implements relevant controls related to conflict, protest and violence

Implements relevant controls related to conflict triggers associated with actual or perceived environmental impacts

Supports development of CMP

Oversees contractors

Prioritises local procurement and hiring

Adapts project design/site activities to minimise conflict or impacts of conflict

Liaises with local police on security measures and responses

Tracks impacts on biodiversity, natural resources and the environment that could be triggers for conflict

Ensures cross-departmental co-ordination

Ensures delivery of CMP
4. IMPACT AND RISK PREVENTION AND MANAGEMENT

4J Conflict Management

4J.4 Tools

Contents in this section:
4J.1 Introduction
4J.2 Guidance
4J.3 Management and resources
4J.4 Tools

4J Tool 1 – Sample Table of Contents for a Conflict Management Plan

<table>
<thead>
<tr>
<th>Section</th>
<th>Contents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose of the document: scope, intended users</td>
<td></td>
</tr>
<tr>
<td>Analysis of conflict context in the site's Area of Influence</td>
<td></td>
</tr>
<tr>
<td>Factors underlying the manifestation of conflict: causes, drivers and triggers of conflict</td>
<td></td>
</tr>
<tr>
<td>Conflict parties: positions, interests, needs, capacities and relationships of key parties to conflict</td>
<td></td>
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<tr>
<td>Conflict dynamics: conflict trends, opportunities and scenarios</td>
<td></td>
</tr>
<tr>
<td>Summary of conflict related risks and impacts</td>
<td></td>
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<tr>
<td>Description of conflict-management approach(es) chosen</td>
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<tr>
<td>Conflict-management objectives, timelines, etc.</td>
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<tr>
<td>Management commitment and leadership: long-term objectives and approach ensure that site management understands the importance of conflict sensitivity and integrates it into decision-making</td>
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<tr>
<td>Conflict-sensitivity awareness, attitude and behaviours: long-term objectives and approach to address the competency, attitudes and behaviours in conflict sensitivity expected of various roles; as well as the capacity levels and capacity-building requirements to reach the required levels of conflict sensitivity</td>
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<tr>
<td>Action plan for the year: activities, tasks, responsibilities, timelines</td>
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<tr>
<td>Measures for documenting conflict-management activities</td>
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<tr>
<td>Systems and tools used for managing conflict data and conflict-management activities</td>
<td></td>
</tr>
<tr>
<td>Roles and responsibilities of Social Performance team, other departments and third parties</td>
<td></td>
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<tr>
<td>Key Performance Indicators (KPIs)</td>
<td></td>
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</tbody>
</table>
Measures for monitoring progress and correcting emerging issues

Measures for collecting stakeholder input on conflict-management processes

Types of reports and description of:
- Objective and contents
- Report developers and recipients
- Frequency of each report

4J Tool 2 – Organisational Conflict Sensitivity and Capacity Assessment Tool

1. Governance

The objective of this section is to establish whether the site has the necessary leadership, accountability mechanisms and culture to enable conflict sensitivity.

### Capacity Requirement

<table>
<thead>
<tr>
<th>Topic</th>
<th>With Sufficient Quality?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management/leadership</td>
<td>Site leadership and management understand and promote the importance of conflict sensitivity and can explain why conflict sensitivity is relevant</td>
</tr>
<tr>
<td>Accountability mechanisms</td>
<td>The site has accountability systems in place that enable conflict sensitivity</td>
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<tr>
<td>Decision making</td>
<td>Conflict sensitivity is integrated into decision making</td>
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<td></td>
<td>Management are aware of and can describe conflict sensitivity accurately</td>
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<td>Management communicate the importance of conflict sensitivity at site level and with external stakeholders</td>
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<td>Management commitment is translated into enabling decisions, resource allocation, etc that supports conflict sensitivity</td>
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<td>It is explicit where accountability and responsibility for various aspects of conflict sensitivity lie</td>
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<td>Performance-monitoring systems consider conflict-sensitive practices of staff</td>
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<td>There is a system for capturing and monitoring activities that ignore or do not adequately address conflict sensitivity</td>
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<td>Incentive systems do not inadvertently encourage staff to avoid conflict sensitive practice</td>
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<td></td>
<td>Conflict sensitivity is given high priority in decision making</td>
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<tr>
<td>Topic</td>
<td>Capacity Requirement</td>
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<tr>
<td>Openness and transparency to discuss conflict</td>
<td>There are 'safe spaces' where people can openly discuss where they feel programmes/activities may have negative outcomes on conflict and share lessons learned relating to conflict sensitivity.</td>
</tr>
<tr>
<td>Reflection and analysis</td>
<td>The site promotes a culture of reflection such that staff are encouraged and enabled to think about and analyse the potential unintended consequences of project and site activities on conflict.</td>
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</table>

### Capacity Assessment

- **2+** Score: 1 gap
- **1** gap: Score: 2
- **No gaps**: Score: 3

#### 2. Resourcing

The objective of this section is to establish whether staff have the necessary awareness and skills in conflict sensitivity.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Conflict sensitivity in site roles</th>
<th>Conflict sensitivity competence</th>
<th>Basic conflict sensitivity</th>
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<tbody>
<tr>
<td>Expectations on what is required from different roles and functions in order to be conflict sensitive are clear.</td>
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<tr>
<td>Staff are competent to fulfil the conflict sensitivity expectations for their role.</td>
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<tr>
<td>The site has a basic level of awareness and understanding of conflict sensitivity. There are conflict-sensitivity checks in the project/site activity approval process. Decision making processes consider the unintended consequences of a decision, including how these could result in greater conflict. People are clear what to do when they feel a project or operational activity may contribute to conflict. Management demonstrate leadership around the topic of acknowledging and discussing conflict-risks and impacts with site level staff. Incidents relating to conflict are investigated and lessons learned are shared. A process of reflection on conflict context is institutionalised and actively promoted as part of planning and decision making. Conflict sensitivity responsibilities are explicitly referenced in role profiles for relevant staff or teams. Conflict sensitivity competencies are included in the role profiles of relevant support functions. Staff are aware of the implications conflict sensitivity has for their role. Staff have the necessary knowledge, skills and attitudes to fulfil the conflict sensitive expectations of their roles. Staff are aware of and able to articulate the appropriate attitudes and behaviours for conflict sensitivity. Conflict sensitivity competencies are included in the recruitment process for relevant staff and management. Conflict sensitivity competencies are included in appraisal processes for relevant staff and teams. All key staff with conflict management responsibilities can give a good basic description of conflict sensitivity, and why it is important. Staff working in support functions also consider conflict.</td>
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### Conflict Sensitivity Training and Capacity Building

The site ensures that training is provided where deficits in current knowledge or skills are identified as well as to reinforce conflict sensitivity competencies.

Conflict sensitivity of contractors and partners is understood and considered in their selection process.

### Capacity Assessment

- 2+ gaps: Score 1
- 1 gap: Score 2
- No gaps: Score 3

### Integration

The objective of this section is to establish whether conflict sensitivity is integrated into site activity.

Commitment to conflict sensitivity in core plans, strategies and procedures

Conflict sensitive principles are integrated into relevant strategies, planning documents and operational procedures.

Conflict sensitivity is integrated into site planning and operational activities.

Conflict sensitivity is integrated into project planning and implementation (including new capital projects, organisational changes and site closure).

Is conflict sensitivity integrated into social performance activity design and implementation?

- Reference to conflict sensitivity as relevant to their work, e.g., supply chain, environment, human resources
- Staff induction includes conflict sensitivity including briefing on conflict issues relevant to specific functions' areas of responsibility
- Competency for conflict sensitivity is assessed as part of the site's resource assessment process to systematically identify and address deficits
- Staff are receiving support to build skills/awareness where there are deficits
- Conflict-sensitivity requirements are made explicit in tenders, contract documentation or memorandums of understanding with contractors and partners, as relevant.
- Contractors and partners are asked to detail resources (time and budget) required to meet conflict sensitivity expectations, where relevant.

References to conflict sensitivity are made in core site plans, strategies and procedures, e.g., those relating to procurement, recruitment, SED planning, stakeholder engagement, security.

Core site planning processes consider and report on interaction between conflict and site activities.

There is regular evaluation and reporting on site activities using conflict sensitivity criteria to understand and manage any (unintended) impacts/risks related to conflict.

Project planning considers and reports on interaction between conflict and project activities at each stage of the project cycle.

There is regular evaluation and reporting on project activities using conflict sensitivity criteria to understand and manage and (unintended) impacts/risks related to conflict during project implementation.

External and internal context reviews incorporate conflict analysis.

Stakeholder analysis processes consider stakeholders' potential role in or sensitivity to conflict.

Interaction between conflict and other social performance activities.
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1 A
This section provides guidance to support sites in understanding impacts and risks related to artisanal and small-scale mining (ASM) and the approaches that can be taken to manage such risks and impacts, with the objective of fostering positive relationships where this is feasible.

Effective assessment and management of risks and impacts is context specific. Done well, it can contribute to the health, safety and security of all stakeholders, establishing trust and positive relationships with local communities and related stakeholders, ensuring uninterrupted site activities, and enhancing site reputation.

Conversely, if not well managed, related risks and impacts can increase tensions with local communities and related stakeholders, result in violence or human rights abuses, adversely affect employees' safety, disrupt site activities and damage a site's reputation. It must be noted that some activity is illegal or controlled by criminals. In these circumstances, particular caution is required.

Box 4K.1 Key international standards and requirements

ICMM

IRMA

ASM
Understand the context
Engage with entities and communities
Foster Positive Relationships and Opportunities for and Communities, i.e. security forces are trained in VPs, demonstrate considerations for enhancing opportunities for positive impact of
Perform Due Diligence in Commercial Relationships with, where applicable,

Additional standards, requirements, and guidance are presented in the Tools Section below.

This section is aligned with international standards, requirements and guidance on ASM, including guidance by the International Council on Mining and Metals (ICMM), the Initiative for Responsible Mining Assurance (IRMA), the Responsible Jewellery Council (RJC) and others. Other standards that apply to include the International Finance Corporation Performance Standards (IFC PS) relating to Assessment and Management of Environmental and Social Risks and Impacts (1), Community Health, Safety and Security (4), and Land Acquisition and Involuntary Resettlement (5).

International guidance and standards require that, at a minimum, the context and dynamics are understood, engagement with stakeholders is conducted, and -related risks and impacts are identified and managed. Where legal and other factors permit, there may also be situations where the site should evaluate the merits of supporting or facilitating the formalisation and professionalisation of, in collaboration with the host-country Government and other relevant actors.

Where is present on a site’s concession or in the site’s Area of Influence, the site is required to identify, assess and manage -related impacts and risks. This requirement applies across all stages of the asset lifecycle. Specifically, this section:

Highlights core definitions and concepts relating to and interacting with ASM
Provides an overview of good practice guidance and standards relating to engagement with ASM
Provides guidance on how to analyse and understand the context and dynamics of ASM
Outlines how to identify, assess and manage -related impacts and risks
Provides guidance on how to identify and engage with stakeholders
Describes the process of determining an management approach and the development and implementation ofASM
Intended users

The management of \( \text{requires a multi-disciplinary approach.} \) The intended users of this section include Social Performance, Security, Legal, Safety, Health and Environment, Risk Management and Government Relations. In some circumstances, Business Unit or Group level actors such as Corporate Relations and Legal may also need to be involved.

Relevance to other sections

Management is interconnected with and supported by other components and sections of the Social Way Toolkit:

- **Management Plan (ASM)**
  - Details specific considerations for economic or physical displacement of stakeholders.

- **ASM**
  - Details the external partnerships required as well as the internal coordination and cross-functional collaboration needed in the context of ASM.

- **Governance (Section 1)**
  - Section 1 provides guidance on social performance management and resourcing. It establishes the Social Performance Management Committee (SPMC) as the main governance structure supporting cross-functional collaboration in developing, implementing and monitoring the Management Plan (as relevant) and reviewing-related impacts and risks.

- **Review and Planning (Section 2)**
  - Sites should include-related information in the internal and external context review. Sites should also consider actors when assessing systemic vulnerability.

- **Engagement and Analysis (Section 3)**
  - A. Stakeholder engagement (3A) - management requires engagement with a broad range of stakeholders. The Stakeholder Engagement Plan (SEP) should include specific approaches for engagement with-related stakeholders, including for those directly involved in.
  - B. Incident and Grievance Management (3B) - Sites should ensure that stakeholders involved in are able to access the grievance process and that grievances and incidents related to are addressed.
  - C. Social and Human Rights Impacts and Risk Analysis (SHIRA) (3C) - Sites should include-related impacts and risks in.

- **Impact and Risk Prevention and Management (Section 4)**
  - A. Socio-Economic Development (SED) (4A) - programmes and/or projects can help control, prevent or mitigate risks and impacts related to. Where programmes and/or projects form part of a site's approach to management, these should be incorporated in the site's Plan.
  - B. Community Health and Safety (CHS) Management (4C) - activities can adversely impact the health and safety of site staff, contractors, local communities, and those directly involved in. Mitigation measures around community health and safety impacts to-related stakeholders (related to the site's presence and activities) should be included or referenced in the site's management plan.
D. Emergency Preparedness and Response Planning (EPRP)  
Stakeholders involved in can cause and/or be the victim of site-induced emergencies. An example of an -related emergency is pit wall failure or collapse of tunnels and galleries in workings on or off-site property, caused by site vibrations and blasting. Relevant -related emergencies should be incorporated into the site's EPRP.

E. Security Management and the Voluntary Principles on Security and Human Rights  
Site security services must adhere to the Voluntary Principles on Security and Human Rights when engaging with stakeholders involved in . Potential human rights impacts related to the interaction between security services and stakeholders should be assessed and managed as part of .

F. Land Access, Displacement and Resettlement  
Eligible stakeholders may need to be economically or physically displaced. This should be managed using the process for land access, displacement and resettlement outlined in section 4F .

G. Site-Induced Migration  
Where is a component of site-induced migration (SIM) this should be included in the site's analysis and management of .

H. Indigenous Peoples  
In some cases, is a traditional livelihood activity of indigenous peoples. In other cases, by other stakeholder groups may impact on Indigenous Peoples.

I. Conflict Management  
can be a source of conflict between a site and -related stakeholders, within communities, and with government authorities and should therefore be considered in the site's conflict analysis and management approach as appropriate.
The term **ASM** defines formal or informal mining operations that use predominantly simplified methods of mineral exploration, extraction, aggregation, processing and transportation. In general, it is characterised by low capital intensity, low use of technology, and high labour intensity.

ASM can encompass different types of organisational structures, from individual men, women, boys or girls, to families or smaller groups, to associations or small enterprises, up to groups of hundreds or thousands of individuals. Levels of mechanisation can range from non-mechanised tools (e.g. pickaxes, shovels), to smaller degrees of mechanisation (e.g. motor pumps, ventilation, metal detectors), up to semi-mechanised operations using excavators, crushers, sluices, dredges, etc. The difference between 'artisanal', 'small-scale', and 'semi-mechanised' mining is usually defined in national mining legislation, based on criteria such as type of equipment used, depth of workings, size of surface area, volumes produced or level of formality.

There are at least 40 million people directly engaged in ASM globally, and around 150 million people depend indirectly on ASM as a livelihood. ASM is also an important supplier of minerals, with an estimated production of 20% of globally mined gold, 80% of sapphires, about a quarter of tin and tantalum and 20% of gem-quality diamonds.

ASM is driven by poverty and opportunity. Many choose to work in ASM due to poverty and unemployment and the lack of access to other livelihood activities. ASM is often the alternative livelihood of population groups that are illiterate, unskilled, landless, or otherwise marginalised. At the same time, economic opportunity is a strong pull factor as ASM can provide, or be perceived to provide, higher incomes than other livelihoods. ASM is often conducted in addition to other livelihood activities or in times of economic or seasonal stress.

ASM can be a driver of local economic development, which is increasingly recognised by governments and development agencies. Many involved in ASM identify as 'professional miners' and cannot envisage working in other sectors due to their job history or aspirations. They carry out ASM to continue a traditional form of livelihood of their local community or their ethnic group, or because ASM offers an opportunity to climb up the social ladder through the accumulation of wealth and political influence, leadership of small enterprises, or ability to educate their children.

ASM can be associated with human rights issues such as child labour, forced labour, torture and cruel, inhuman and degrading treatment, as well as unsafe working conditions, significant impacts on health and safety, and environmental damage. Because it is often conducted informally or illegally, the ASM sector is prone to exploitation through corrupt practices of public officials, criminal elements or armed groups, which can be connected to extortion, financing of crimes.
activities often occur on a scale of formality, as illustrated in Table 4K.1. “Illegal” operations refers to activities that are explicitly forbidden by law, such as mining in a protected area or on a concession over which a private owner or large-scale mining company has exclusive rights. “Informal” refers to activities that are located outside explicitly prohibited areas but where legal or permit requirements are not developed or are unclear. In such cases, it is not necessarily illegal, because it is not explicitly forbidden, but the law may be violated by not having the necessary permits or by not having conducted an environmental assessment, for example. Most legal frameworks specify the consequence for infractions. There are often no clear boundaries between the categories of ‘legality’ illustrated in Table 4K.1 and activities can move between these categories or fall under two or more categories at the same time. Table 4K.1 Possible status of the sector

<table>
<thead>
<tr>
<th>Status of sector</th>
<th>Legal Context</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legal</td>
<td>A legal framework for the sector exists, is actively implemented, and is enforced by the competent authorities.</td>
</tr>
<tr>
<td>Legitimate</td>
<td>A legal framework for the sector exists, but it is neither actively implemented nor enforced.</td>
</tr>
<tr>
<td>Informal</td>
<td>A specific framework for the sector does not exist.</td>
</tr>
<tr>
<td>Illegal</td>
<td>Explicitly prohibited by law.</td>
</tr>
<tr>
<td>Illicit</td>
<td>Not taking place in accordance with the law.</td>
</tr>
<tr>
<td>Criminal</td>
<td>Financing or supporting criminal activities.</td>
</tr>
</tbody>
</table>

Often see interactions between LSM and ASM as a challenge due to potential competition over mineral resources. Operators may consider themselves the rightful owners of the mineral, while operators may also consider themselves as having a legitimate (if not formal) claim to these resources, for example due to their history in the area, their embeddedness within local communities, or due to the perception that benefits only 'foreigners' and government elites. In such situations, may face incursions and trespassing on their concession, theft of minerals, threats to safety and security of employees and contractors, as well as damage to their infrastructure, equipment and assets. May also be held liable for safety, social and environmental issues occurring on their concession, so poor practices may pose a regulatory, financial and reputational risk too. Such risks and impacts need to be handled carefully, as mismanagement of interactions can further damage relationships, increase tensions, or result in allegations of human rights abuses. On the other hand, positive relationships between and can mitigate these risks, and can in some cases be turned into opportunities where a variety of scales of mining can harmoniously co-exist in an area.
Effective management of can be hampered by misconceptions or misunderstandings, including:

- Focusing on the workers ('diggers') only:
  Those working directly on sites are the most visible part of broader economic and social networks related to ASM, but typically consists of a larger system of influence involving many different actors, who have leverage over when, where and how it is conducted. This system of influence and the stakeholders within it need to be understood in order to design a comprehensive management approach.

- Thinking that 'alternative livelihoods' are the solution to ASM:
  In many cases, ASM already is the alternative livelihood for those working in ASM and provides more income quicker than any other available livelihood activities. In short, there is typically a significant incentive to keep working in ASM.

- Not considering the broader political or social dynamics of ASM:
  is sometimes politically motivated. For example, youths may seek to break free of traditional hierarchies and expectations by engaging in ASM activities, politicians may seek to raise cash for the next electoral campaign through ASM activities, or miners may see the ASM sector as a way of resisting large and/or foreign enterprises or a corrupt state. Such political dynamics should inform engagement with and management of ASM.

- Assuming that the context is static:
  Dynamics around ASM can be extremely fluid, resulting in an ever-changing context. This should be monitored on a continuous basis and engagement and management approaches should be adjusted to the new context as needed.
Term defined by the OECD. OECD Due Diligence Guidance or Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Available at: https://www.oecd.org/corporate/mne/mining.htm [Accessed on 18 August 2020]
The following section provides a guide to assessing impacts and risks to inform the development of a management plan. As is context specific, the approach needs to be calibrated appropriately to the operating and regulatory environment in which it is occurring. Specialist expertise should be sought to support sites in the identification of related impacts and risks and in developing an approach to manage these risks and impacts, as appropriate. This guidance is not intended to be prescriptive but offers site teams options to consider in the management of related impacts and risks at their site. The approaches presented in this guidance are not mutually exclusive and may be combined and/or used progressively over the lifecycle of the asset. The Social Way follows the Plan Do Check Act (PDCA) management process and the guidance in this section is structured accordingly.
FIGURE 4K.1 - THE CYCLE AS RELEVANT TO PDCA ASM

1. Review context
2. Map and analyse ASM stakeholders
3. Conduct stakeholder engagement
4. Assess potential ASM-related impacts and risks

5. Determine ASM management approach
6. Update SHIRA
7. Develop an ASM Management Plan

8. Monitor and evaluate
9. Adjust
10. Report
The PLAN phase focuses on gathering internal and external context information and engaging with stakeholders to be able to assess potential social and human rights impacts and risks related to ASM. Reviewing the internal and external context related to ASM, stakeholder engagement, and the development of a Management Plan can be a time-consuming, resource-intensive and technically complex process, which may require outsourcing to consultants. Considerations for contracting a consultant are provided in Box 4K.4.

Sites should consider the following when contracting specialist support:

- The specialist's skills and experience should fill capacity gaps in the site's internal team and be appropriate to the significant risks in the local context (e.g. child labour, illicit financial flows, corruption, youth politics, etc.) and the likely management approach chosen by the site.
- The specialist should have in-depth understanding of and experience in managing relationships between and, or, have worked for companies in a position where issues needed to be considered. Where possible, the specialist should have gained this experience in different geographies and minerals to bring a high-level perspective to the assignment.
- The specialist should be familiar with international standards, requirements, guidance and examples of good practices around relations and management.
- The specialist should have practical expertise in developing and applying corporate governance and management systems, including related policies, procedures and guidance.
- Expertise in specific issue areas may be required, such as child rights and addressing child labour in, organisational capacity building around formalisation, technical or engineering assistance around improving safety, health and environmental aspects in, etc.
- The specialist should ideally be familiar with the local context and regulatory environment, but should be impartial and trustworthy for all stakeholders.
The specialist may not need to be familiar with the local context if they can work with a local partner who can bring this expertise. This also allows for a transfer of skills to local consultants, building their capacity for and utility in future work.

Section 1, Governance, provides more detail on the use of consultants in social performance.

Table 4K.2 Key aspects to consider in the internal and external context review

<table>
<thead>
<tr>
<th>Topic</th>
<th>Key aspects</th>
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<tbody>
<tr>
<td>Legal and policy framework</td>
<td>related to mining activities</td>
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<td>History of mining activities</td>
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<tr>
<td>Profile of mining activities</td>
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<tr>
<td>Task 1 – Review context</td>
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<tr>
<td>Can mining activities have legal status in the jurisdiction?</td>
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<td>What are the types of mining allowed, and under which conditions?</td>
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<tr>
<td>What is the process for becoming legal/formalised?</td>
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<tr>
<td>Which government agencies or actors are involved in monitoring, regulating and formalising the sector, and what is their role?</td>
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<td>Are there any legal/formal titles in the vicinity of the site?</td>
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<tr>
<td>Does the legal framework allow giving part of a concession area to</td>
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<tr>
<td>Does the government have a policy, strategy or plan related to the sector and its formalisation, and what does it entail?</td>
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<tr>
<td>What is the history of activity and land management in the area, including on the concession before site construction started?</td>
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<td>How has the activity evolved over time – has it increased, decreased or remained stable?</td>
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<td>Are the stakeholders, local community members or a result of influx?</td>
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<tr>
<td>How is the activity viewed by the local community?</td>
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<tr>
<td>What has the history of interaction between the stakeholders and the project/operation been (particularly important in the case of acquisitions or the transition from exploration to project)?</td>
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<tr>
<td>Where does activity happen in the Area of Influence? Can the location and extent be mapped (e.g. using GIS or satellite imagery) and tracked over time?</td>
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<tr>
<td>What types of activities exist on or near the concession? e.g. sporadic incursions and theft, large or sudden influxes, permanent with built structures (shelter, storage spaces, etc)?</td>
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<tr>
<td>What types of activities are conducted on the concession? e.g. digging/tunnelling, handpicking/theft of ore or concentrate, handpicking/sieving of waste dumps or tailings, washing of ore in river.</td>
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<tr>
<td>What types of activity happen in neighbouring areas around the concession and the communities, and where? e.g. permanent with built structures, seasonal, sudden rushes.</td>
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<td>What equipment do miners, concentrators and traders use (both on concession and in neighbouring areas)? e.g. non-mechanic, traditional tools (pickaxes, shovels, hammers, non-mechanical sluices, etc), small mechanisation (water pumps, ventilation), or more sophisticated mechanised tools (dredges, mechanised crushers, mechanised sluices, etc). The extent of mechanisation can be an indication of how powerful the investors behind are.</td>
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<tr>
<td>What legal status does the activity outside the concession hold? e.g. illegal, informal, formal, legal, legitimate.</td>
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<td>In cases where is not illegal but does not have a permit, what is the reason that actors do not have the required permits? Are the actors interested in, or have they tried to obtain the necessary permits?</td>
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<td>How many miners are active in which locations and what are their profiles (gender, age, ethnic groups, etc), by role in the mine (digging, crushing, washing, processing, pit manager, licence-holder, financiers, etc)?</td>
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</table>
Understand the trade and financing:
- Map the mineral flow by geography, process and ownership: Where does the mineral go after extraction, after processing? e.g. team lead, aggregator/processor, local trading agent, trader/buying counter, refiner, exporter. At what point is it sold?
- Map the financing flow: Who is pre-financing activities, how and based on what social or economic criteria?
- What are the predicted trends for the metal/mineral that is relevant for; are pricing trends likely to increase activity in the coming years?

Understand motivations for, and dependence on for local livelihoods:
- Why do people engage in? e.g. commodity prices, local economic crisis/increase in poverty, decline in agricultural livelihoods, seasonal cash needs.
- How many people depend directly or indirectly on in the area? What other livelihoods and economic activities are viable locally?
- What is the role of women in the sector? What kinds of jobs do they perform (either directly in the sector or indirectly servicing the sector)?
- How does income from compare with income from other livelihoods (amount, regularity, etc) and business activities?

Understand land-use pressures and geological features of the area: is land available for (where they could become formal operators), and is it geologically viable?

Understand 's contribution to the local economy: Do communities depend indirectly on income from (e.g. by depending on the cash generated through and spent in the local economy, including on food/beverages, housing and rental, transport, tools and equipment)?

Understand working conditions at mining, aggregating and processing sites, and risks for health and safety for both actors and the community.

Understand environmental impacts of activities, including for neighbouring communities.

Do activities involve (worst forms of) child labour, compulsory labour, forced and bonded labour, forms of torture, cruel, inhuman and degrading treatment, other serious infringements of human rights, misuse of drugs, etc?

Life of Asset Plans (LOAPs), including site expansion, new surface rights granted or to be granted, changes in operational processes, and how these may affect activities.
Sites should map and analyse stakeholders following the guidance in Section 3A, Stakeholder Engagement, which includes identifying and mapping ASM-related stakeholders, and understanding their influence and interests, and assessing the vulnerability of stakeholders in the systemic vulnerability assessment (see Section 2, Review and Planning).

Stakeholders include more actors than the ‘diggers’. When mapping and analysing stakeholders, sites should consider the broader system. Figure 4K.2 provides an overview of the stakeholders typically involved in an ASM system but note that local role terms may vary from country to country.
Table 4K.3 Identifying stakeholders

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<thead>
<tr>
<th>Vested interests</th>
<th>Community and vulnerability</th>
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</thead>
<tbody>
<tr>
<td>Who has influence and leverage over actors, e.g. team leaders/foremen, traditional authorities, customary landowners, financiers, religious leaders?</td>
<td>Who is involved in mining, trade and financing in the background, who benefits, and how? e.g. politically exposed persons, private investors, specific political groups, etc, through pre-financing, trade deals, corruption.</td>
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<tr>
<td>Are supply chains linked to criminal groups or armed groups, i.e. financing crimes or armed groups by controlling sites or trading routes, or by illegally taxing/extorting money along supply chains, through corruption, money laundering, etc?</td>
<td>Are the community and stakeholders the same, are there overlaps, are there conflicting interests/relationships?</td>
</tr>
<tr>
<td>Where do miners, processors, traders, financiers come from? Are they considered part of the community, or rather as 'outsiders' and why?</td>
<td>Who is involved in? Are there particular ethnic groups, groups that are particularly vulnerable or marginalised, groups aligned with certain power brokers or financiers, etc?</td>
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<td>Which actors within the ecosystem are most vulnerable and why? Which are those most hidden?</td>
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Engagement with stakeholders should follow the process outlined in Section 3A. Sites should engage with stakeholders for several reasons, including to:

- Especially in cases where no previous communication or engagement channels with actors exist, initial engagement will be the foundation for trust and relationship building, and therefore needs to be carefully considered and planned.
- Sites should engage with stakeholders either directly, or indirectly through a third party:
  - ASM gather further information and intelligence about the context
  - ASM identify stakeholders
  - ASM manage misunderstandings and expectations on both sides
  - ASM gather input into the design of controls for managing ASM-related risks and impacts
  - ASM gather information about control effectiveness
  - ASM assess whether stakeholders can access the grievance process.

Engaging directly with stakeholders:
- In some cases, it is possible to engage directly with stakeholders and their representatives or leaders. This is often the case in contexts where has existed for a relatively long time and consists at least partially of 'legitimate', formal and/or legal activities. Direct engagement can consist of the following:
  - As a first step it may be useful for a site to have informal conversations with actors or their representatives. Informal encounters or conversations can be used to build a preliminary relationship, which can be useful to plan more formal engagement.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan
Through stakeholder mapping and analysis, sites should get a better understanding of who the leaders or representatives are, and where the points of leverage in the system might lie. Stakeholders may be different from community stakeholders, neither represented in community engagement platforms, nor by the community leaders the site routinely engages with.

Meetings with leaders or representatives:

For a first meeting it may be beneficial to engage a smaller group of leaders or representatives, or conduct informal one-on-one meetings with leaders or representatives to establish an initial point of contact.

Meetings with a wider set of representatives:

In the initial stages it may also be beneficial to extend the engagement to a wider set of representatives beyond the key leaders including marginalised groups (e.g. women, migrants, youth, the elderly, certain ethnic groups, ex-combatants, and so on) and representatives of the different roles in the system.

Site visits:

Sites should consider organising a visit to the site(s), with the help of leaders and representatives. This allows for an in-depth observation of the workings at the site(s), as well as one on one interviews with different types of stakeholders in a variety of roles.

Formalised engagement:

After a period of initial meetings and once a certain level of trust is established, sites should consider establishing regular and formalised points of engagement with stakeholders. Sites should collaborate with stakeholders to understand their preferences for engagement, e.g. involvement in the Community Engagement Forums (CEF).

Engaging indirectly with stakeholders:

Sites should consider that stakeholders may not want or may not be able to engage directly with the site due to the informal or illegal nature of their activity. Engaging with stakeholders directly may in some cases also pose safety and security risks for the site’s employees. In such cases, sites should engage indirectly with stakeholders. This involves collaborating with third parties who can or already have a direct relationship with. In some cases, these third parties could consist of government authorities in charge of monitoring and formalising the sector, though stakeholders acting illegally/informally may be equally hesitant to engage with Government representatives. Other options for third party engagement are traditional authorities, religious leaders, and/or NGOs, or a multi-stakeholder initiative or platform. Over time, indirect engagement with stakeholders can progress into direct engagement.
Task 4 - Assess potential ASM-related impacts and risks

Sites should use internal and external context information to assess ASM-related impacts and risks as part of the annual described in Section 3C. Table 4K.4 provides examples of potential impacts and risks related to ASM as well as examples of control measures. The control measures are further expanded in the section on developing an Management Plan.

Table 4K.4 – Examples of potential impacts and risks related to ASM

<table>
<thead>
<tr>
<th>Category</th>
<th>Potential impact</th>
<th>Example control*</th>
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<tbody>
<tr>
<td>Economic</td>
<td>Loss of livelihoods and income for ASM owners, e.g. due to economic displacement, reduction of land availability and access, reduction of access to production factors (such as streams and rivers to wash the ore), loss of lowest skilled, manual jobs if ASM is formalised with site support and jobs are replaced by machinery/equipment.</td>
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<td>Social</td>
<td>Cumulative impacts, such as diminishing land access due to mine expansion, urban expansion, other mining companies in the area, all land in the area already covered by large scale mining permits</td>
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<td>Support alternative livelihoods (although ineffective)</td>
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<td>Also see further guidance on economic or physical displacement in Section 4K.4 Tools (Tool 2).</td>
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<td>Social Performance Government Relations</td>
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<td>Performance adherence to the VPSHRs by public and private security forces</td>
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<td>Inclusion of marginalised groups into stakeholder engagement to ensure their views are heard</td>
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<td></td>
<td>Increased marginalisation of the most vulnerable. For example, youth, women, and undocumented migrants working in ASM without alternative support</td>
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<td></td>
<td>Support alternative livelihoods for vulnerable groups (if appropriate and S&amp;SD)</td>
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4. IMPACT AND RISK PREVENTION AND MANAGEMENT

Plan

Task 4 - Assess potential ASM-related impacts and risks

Contents in this section:

Task 1 - Review context
Task 2 - Map and analyse ASM stakeholders
Task 3 - Conduct stakeholder engagement
Task 4 - Assess potential ASM-related impacts and risks
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Different contexts, types of activities, and risks and impacts require different management approaches and controls. Figure 4K.3 and Table 4K.5 describe a range of approaches that may be relevant in different contexts and at different times. The approaches are schematic and broadly defined based on a spectrum. Sites should consider this range of options when determining a broad direction for their management approach, tailored to their context. For example, avoiding ASM-related impacts might not always be possible (especially where ASM is present illegally on the site's concession), and thus minimisation, mitigation, remediation and compensation/offsetting of impacts may play a larger role. The management approaches are not mutually exclusive, and their components can be combined and adapted to the specific context. A full risk assessment should support decision making on the types or combination of management approaches most suitable to address potential ASM-related risks and impacts and achieve long-term objectives. The SPMC should be involved in determining the broad direction of an approach to manage ASM, in consultation with other relevant functions including legal, security and Government relations. The BU or Group Social Performance should also be consulted, particularly if sites choose an approach that falls under categories 4 – 6.
For management approaches 1 to 3, economic or physical displacement of stakeholders may be necessary. In such a case, sites should follow the process outlined in Section 4F on Land Access, Displacement and Resettlement, and consider the additional specific guidance in the Tools section. Under management approaches 4 – 6, sites may allow on the concession area under strict rules and supervision. Targeted programmes may be an effective control for approaches 3 - 6. In such cases, sites should follow the guidance in Section 4A on Socio-Economic Development, and specifically assess the need for, and feasibility of, supporting the professionalisation and formalisation of, providing technical and livelihoods support to and/or supporting the development of alternative livelihoods.

Table 4K.5 suggests which approaches might be best suited for which contexts and provides a view of advantages and disadvantages. A site’s approach to management can change over time.

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Applicability and advantages

ASM management

Description

Applicability and advantages

Disadvantages and considerations

**Protection of site and deterrence of government**

3. Co-existence off the site's concession area: supporting alternative areas

4. Co-existence on specific zones in the site's concession area, requiring tailored security measures, but adjusted to allow certain activities on the site through site security measures

Any physical or economic displacement of the site's concession area (e.g. VPSHRs), Government efforts to formalise the activities in the area, training and potentially technical assistance.

Protection of site and deterrence of government

Security measures, such as miner registration and access control, can be conducted in line with the requirements outlined in Section 4F, and finding alternative solutions for allowing activities to take place outside the site's concession area.

Land Access, Displacement and Resettlement

Any physical or economic displacement of the site's concession area and finding alternative solutions for allowing activities under clear rules.

Support could consist of facilitating formalisation, assessing the security forces' approach, and training is integrated with the multi-stakeholder process.

Approach relies on arrests, detention and/or negotiated technical assistance if required.

Can result in violence between site and stakeholders because of a lack of understanding of the security forces by public and private stakeholders. This can lead to human rights violations on site property.

Can be useful if there are permanent influxes or more stakeholders on the site, specifically during increased activities.

Can reduce tensions, establish trust, and give the site the opportunity to manage security forces.

Can be useful if there are permanent influxes or more stakeholders on the site and finding alternative solutions.

Can be useful where other concession areas are focused on mining other minerals than those mined by the operator in terms of environmental issues.

Can be useful where other concession areas are focused on mining other minerals and dump/dumps, or where the activities are focused on mining other minerals than those mined by the operator.

Can be useful in areas where no other concession areas are focused on mining other minerals and where mining other minerals than those mined by the operator is relatively straightforward to manage.

Can be useful where other concession areas are focused on mining other minerals.

Can result in violence between site and stakeholders, specifically during increased activities.

Can reduce tensions, establish trust, and give the site the opportunity to manage security forces.

Can be useful if there are permanent influxes or more stakeholders on the site and finding alternative solutions.

Can be useful if there are permanent influxes or more stakeholders on the site and finding alternative solutions.

Can result in violence between site and stakeholders, specifically during increased activities.

Can reduce tensions, establish trust, and give the site the opportunity to manage security forces.

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Can reduce tensions, establish trust, and give the site the opportunity to manage security forces.
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<th>5. Cohabitation</th>
<th>6. Commercial collaboration</th>
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<tr>
<td><strong>Description</strong></td>
<td><strong>Applicability and advantages</strong></td>
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<td><strong>Disadvantages and considerations</strong></td>
<td><strong>ASM</strong></td>
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</table>

**Protection of site (including concession area) and deterrence of activities on site through site security measures**

- Where feasible and legally possible, site formally gives (or authorises/subcontracts) a part of its concession area to an operator by contracting the operator as a supplier or sub-contractor.

- A formal commercial agreement is established (for example one in which the site buys minerals produced by the operator) which includes a clear definition of roles, responsibilities and liabilities.

- Includes regular monitoring and conducting due diligence.

**Can be a win-win option for the site and the stakeholders.**

**Can be useful if there are large permanent activities on the site's concession area, and where economic displacement of stakeholders would cause conflict.**

**Can be useful in areas where there is an established and important livelihood.**

**Requires a well-organised operator (e.g. association, cooperative, small business).**

**Not feasible in jurisdictions where the legal framework does not allow parts of the site's concession area to another operator.**

**Requires clear, nuanced and timely communication on the efforts to secure civil society and media buy-in.**

**Can increase rehabilitation and closure costs.**
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ASM management approach

**Description**
- Applicability and advantages
  - Can include site support for the operator in terms of enterprise development, safety, health, and environmental standards and practices, and application of certain mining techniques.
  - Includes regular monitoring and conducting due diligence, as well as establishing a chain of custody/traceability system for production.
- Disadvantages and considerations
  - Can be useful where targets the same minerals as the site.
  - Site has control over activities and how they are conducted.
  - Can support formalisation.
  - Requires the operator to adhere to human rights, security, health and environmental standards.
  - Can include economic and/or productivity challenges, e.g. operator not agreeing with prices paid, or stoppage of activities when market prices fall.
Sites should include related risks and impacts in the Baseline, based on the context review and engagement with stakeholders, and the management approach selected.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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Task 7 - Develop an ASM management plan

Contents in this section:
Task 5 - Determine ASM management approach
Task 6 - Update SHIRA
Task 7 - Develop an ASM management plan

Where potential and/or actual -related impacts and risks are significant, sites should develop an Management Plan. A stand-alone Management Plan ensures continued focus on and a comprehensive approach to management. The Management Plan should outline the site’s broad approach to management and implementation plan including the concrete activities, measures and controls put in place. An outline for an Management Plan is provided in Tools. The Management Plan should be revised annually. Key -related impacts and risks should be included in the . Sites may choose to include the Management Plan as an Annex to the.

Table 4K.6 sets out examples of concrete activities, measures and controls for management.

### Table 4K.6 – examples of activities, measures and controls for management

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measures to improve livelihoods (off-site in alternative zones, or on-site, depending on the model/approach chosen). Ideally this is aligned with the Government's plan or policy around formalisation and conducted in collaboration with the Government. This can include:

- The effective implementation of the Management Plan likely requires collaboration with a range of external stakeholders, including the government and NGOs. To enable successful collaboration, sites should consider establishing formal agreements or MOUs with clearly defined roles and responsibilities.

- Training or investment in measures in SHE can include:

  - Addressing social issues such as child labour, forced labour, drug abuse, etc.**
  - Skills development, training and capacity building on improved and safer mining and processing methods. This can be done through a third party or by site employees, or Group employees who provide knowledge and expertise regarding technological expertise, geological expertise, mining and production methods, etc.

- Enterprise development and organisational capacity building – supporting better organisation of groups and facilitating formalisation.

- External capacity development: Building the capacity of government agencies responsible for managing, formalising and overseeing the sector.

- Supporting better access to responsible supply chains/markets and finance.

- Supporting alternative livelihoods outside of ASM.
A monitoring and evaluation framework should be developed to track the effectiveness of the management approach and mitigation measures.

As part of the implementation of controls, their effectiveness should be evaluated so that corrective action can be taken where needed. An example is provided in Table 4K.7.

Sites should also develop indicators for monitoring of and tracking changes in the context or its dynamics on an ongoing basis, such as the location of activities, the number of stakeholders involved, what type of activities are being conducted, and changes in grievances or incidents related to.

### Table 4K.7: Example

<table>
<thead>
<tr>
<th>Potential Impact or Risk</th>
<th>Controls</th>
<th>Target</th>
<th>Control Owner</th>
<th>Timeline</th>
<th>Inputs</th>
<th>Implementation Check</th>
<th>Outputs</th>
<th>Outcomes</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Describe the potential impact/risk</td>
<td>List the Controls</td>
<td>What are we trying to achieve?</td>
<td>List function responsible for the Control</td>
<td>Date the Control should start and be completed</td>
<td>Human and financial resources needed to implement the Control</td>
<td>How do we know that the controls are being implemented?</td>
<td>Outputs produced</td>
<td>Changes that have occurred as a result of Control - Include sources of verification</td>
<td>Value and success in managing the impact - Include sources of verification</td>
</tr>
</tbody>
</table>

**Example:**

- **Injuries or fatalities of employees**
  - **Site security measures**
  - **Zero injuries or fatalities of employees**
  - **Security**
  - **Start date, end date**
  - **Staff time spent in training**
  - **Due diligence/security risk assessment report finalised**
  - **All staff and contractors, and public security are followed by all private and public security**
  - **VPSHR**
  - **Reduction of injuries or fatalities of employees**
  - **VPSHRs**

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**Notes:**
- A = indicates agreement or acceptance.
- z = signifies impact or potential risk assessment.
- W = denotes implementation or effectiveness.
- fi = implies feedback or improvement.
- =Z = represents expected outcomes or goals.
- k = highlights key actions or milestones.
- A = confirms adherence to specified criteria.

**Context:**
- The table likely represents a matrix for tracking and evaluating various control measures, targets, and outcomes across different phases or stages of a project or initiative. Each cell may correspond to specific criteria, measures, or indicators that need to be monitored and assessed.
- The table structure suggests a systematic approach to ensure that all aspects are systematically checked, with feedback and improvements being documented and communicated.

**Key Elements:**
- **A =** indicates status or adherence.
- **z =** signifies impact or risk assessment.
- **W =** denotes implementation or effectiveness.
- **fi =** implies feedback or improvement.
- **Z =** represents expected outcomes or goals.
- **k =** highlights key actions or milestones.

**Example:**
- A control measure is agreed upon (A =), and a feedback or improvement action (fi) is noted.
- The implementation stage (W) is ongoing, with potential impacts or risks (Z =) being assessed.
- Key milestones or actions (k) are identified for tracking progress and outcomes.

**Additional Observations:**
- The table likely covers a range of topics, such as social inputs, effectiveness, implementation, controls, targets, and outcomes, with specific attention to areas like contractors, stakeholders, and related activities.
The final part of the Plan Do Check Act process is to adjust the Management Plan and update as necessary, based on the monitoring and evaluation conducted.

As part of the annual review process, sites should also develop a list of lessons learned, reflecting on what worked, what did not work and why. Sites should also integrate these learnings into the Management Plan, as they provide additional, qualitative information beyond the monitoring and evaluation frameworks.
Results of monitoring and evaluation and any adjustments made to manage risk-related risks and impacts should be regularly reported to internal and external stakeholders through the ASM or SPMC or equivalent structures, as appropriate. Certain types of information may also need to be reported to the Business Unit (BU) or Group level.

External reporting on depends on regulatory requirements and the nature of collaboration with external parties.

4. IMPACT AND RISK PREVENTION AND MANAGEMENT

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Internal lines of accountability

Table 4K.8 lays out typical internal roles and responsibilities in managing.

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<th>COMPANY LEVEL</th>
<th>PERSON</th>
<th>ROLE</th>
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<tbody>
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<td>GROUP</td>
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<td>Group Social Performance</td>
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<td>BUSINESS UNIT</td>
<td>Government Relations Manager/ Head of Corporate Affairs/Relations</td>
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<td>SITE SOCIAL PERFORMANCE TEAM</td>
<td>SP Manager</td>
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<td>RELEVANT FUNCTIONS</td>
<td>Legal</td>
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<td>ASM</td>
<td>Provides advice and input on how to meet standards and requirements relating to sites' interactions with</td>
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<td>Provides input into selecting the appropriate management approach</td>
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<td>Provides advice on national legislation and regulations around</td>
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<td>Acts as contact point with regional and national authorities</td>
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<td>Receives regular updates through quarterly reports</td>
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<td>Ensures appropriate capacity and expertise is available to site</td>
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<td>Provides input into selecting the appropriate management approach</td>
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<td>ASM</td>
<td>Is responsible for overseeing the assessment, risk and impact assessment, stakeholder engagement and development of the Management Plan</td>
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<td>Is responsible for overseeing the monitoring and evaluation, as well as the reporting</td>
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<td>Is responsible for ensuring compliance and managing legal liabilities</td>
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4. IMPACT AND RISK PREVENTION AND MANAGEMENT
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### Management Plan

The following table provides an outline for an **Management Plan**.

<table>
<thead>
<tr>
<th>Section</th>
<th>Content</th>
</tr>
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<tbody>
<tr>
<td><strong>Introduction and context</strong></td>
<td>Describes the context, its system, dynamics, national legal/regulatory requirements and main stakeholders.</td>
</tr>
<tr>
<td><strong>Objectives</strong></td>
<td>Describes the objectives of the <strong>Management Plan</strong>.</td>
</tr>
<tr>
<td><strong>Standards and requirements</strong></td>
<td>This includes references to internal or external requirements, standards or commitments.</td>
</tr>
<tr>
<td><strong>General roles and responsibilities</strong></td>
<td>Summarises the roles and responsibilities of staff, and where applicable, of government agencies and other third parties.</td>
</tr>
<tr>
<td><strong>Summary of key-related impacts and risks</strong></td>
<td>Describes the key-related impacts and risks that are to be addressed through the management approach and actions, and the controls to prevent, minimise, or manage such risks and impacts.</td>
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<tr>
<td><strong>Summary and general overview of the management approach/direction taken</strong></td>
<td>Provides a summary and general overview of the management approach/direction taken and outlines the rationale for this decision and the results of the risk assessment conducted on the approach.</td>
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<tr>
<td><strong>Management Actions</strong></td>
<td>Describes the detailed actions, activities, measures and controls taken under the broader management approach. This can include:</td>
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<tr>
<td><strong>Engagement objectives and approach</strong></td>
<td>This describes the process of engaging stakeholders relevant for the implementation of the <strong>Management Plan</strong>. It defines the objectives of stakeholder engagement and determines priority issues - for each stakeholder, it describes when the stakeholder should be engaged, by whom (responsibilities), about what (messages), through which channels/means, and on what frequency. This section may also describe the process for setting up a multi-stakeholder partnership with Government authorities and third parties.</td>
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<tr>
<td><strong>governance system and related procedures and guidelines</strong></td>
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<tr>
<td><strong>Economic or physical relocation plan (where appropriate)</strong></td>
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<tr>
<td><strong>Community health and safety measures</strong></td>
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#### Artisanal and Small-Scale Mining (ASM)

### IMPACT AND RISK PREVENTION AND MANAGEMENT

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Monitoring and evaluation

Describes the monitoring and evaluation frameworks for:

a. monitoring and evaluation of ASM-related controls
b. monitoring and evaluation of long-term objectives related to management
c. monitoring the context and dynamics

Reporting

Describes the process of internal and, where applicable, external reporting, including what information needs to be reported to whom in what form.

Annual implementation plan

Describes the annual plan for implementation. Includes tasks and responsibilities, timelines and resources needed.

4K Tool 2 - Guidance on economic or physical displacement of actors

If actors are economically or physically displaced, sites should follow the process outlined in Section 4F, Land Access, Displacement and Resettlement. Additional considerations in relation to economic or physical displacement and resettlement are outlined below:

Conducting a resettlement process with stakeholders is almost certain to bring additional complexity to a 'normal' resettlement process and it is therefore essential to utilise specialist expertise with extensive experience in this specific situation.

Specialist support

A. Eligibility

Stakeholders involved in can be physically or economically displaced as a result of the land access required by the project, as they lose the right to own, use, or otherwise benefit from land (specifically minerals/subsoil), built structures (such as mineral storage shelters) or other fixed or moveable assets.

Stakeholders involved in can in some cases constitute a vulnerable group in a resettlement process, as they may not be protected through land titling legislation and/or their status and livelihoods may be considered informal or illegal. Populations can in some cases also be landless, from ethnic minorities, or displaced populations, and thus be particularly vulnerable.

Stakeholders involved in may fall under the category of land users who do not have a recognisable legal right or claim to the land and/or assets they use and/or occupy (e.g. because they operate informally or illegally). As per Performance Standard 5, such land users are eligible for inclusion in a resettlement or livelihoods restoration process. The Guidance Note on 5 states, however, that this does not apply in case of impacts by project activities 'other than land acquisition or restriction of access to land use', for example the loss of access to state-owned sub-surface mineral rights by artisanal miners. In such cases, Guidance Note 5 requires the application of Performance Standard 1, which mandates the application of the mitigation hierarchy and the establishment of appropriate mitigation measures for affected people.

In addition to the above, physically or economically displacing through security operations only and without a well-organised and equitable process (i.e. a RAP or LRP) can have substantive negative implications for the social license to operate, damage relationships with local communities, and create the risk of tensions and violence. Sites should therefore err on the side of caution and manage displacement of in accordance with Section 4F, where applicable.
This table provides related scenarios or examples for each displacement category included in the displacement process as per standards.

<table>
<thead>
<tr>
<th>Displacement categories</th>
<th>Scenarios/examples</th>
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<tbody>
<tr>
<td>Displacement of individuals and communities that have formal legal rights to land and/or assets they use and/or occupy</td>
<td>Artisanal- and small-scale mining operators who hold a formal permit or authorisation from Government authorities.</td>
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<tr>
<td>Displacement of individuals/communities that do not have formal legal rights to land and/or assets but do have a claim which is recognised under national law.</td>
<td>Artisanal and small-scale miners who have obtained agreements from local Government authorities and/or traditional authorities (landowners, customary chiefs) in cases where such agreements are recognised by law.</td>
</tr>
<tr>
<td>Displacement of individuals/communities who have no recognisable legal right or claim to land and/or assets they occupy or use.</td>
<td>Artisanal and small-scale miners who have no permit, agreement or claim, or have obtained only informal agreements from local Government authorities or traditional authorities (landowners, customary chiefs), which are not recognised by law.</td>
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**B. Planning/baseline/impact assessment**

In the stage of planning, conducting the baseline and assessing impact, sites should consider the following:

**C. Stakeholder engagement**

**D. Mitigation/Livelihood Restoration**

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**Assess the number of stakeholders involved in the designated area.** This should include not only the workers/diggers, but all those affected in the designated area, including washers, transporters, aggregators, secondary service providers (for example those providing food, small shops or kiosks), etc.

The number of stakeholders involved in the designated area may be very fluid and change frequently. As with other stakeholder groups, a displacement or resettlement process may create false incentives for people to move to the area. Sites should set a cut-off date for the baseline/impact assessment, register impacted stakeholders, and consider establishing security and access controls to the area, to allow only registered stakeholders until the designated date of displacement/resettlement.

Conduct an inventory of asset-related assets or settlements where applicable. Assets may include tarps and shelters, storage sheds, kiosks and buying counters, tools and equipment used for mining, aggregating and processing. Settlements may include living quarters of workers staying on site seasonally or permanently (even if informal).

The identification of and engagement with stakeholders involved in the designated area may pose difficulties: On one hand, it may pose a safety and security risk for company employees; on the other hand stakeholders may be fearful of engaging 'out in the open' or being registered due to the informal or illegal nature of their activities. In such cases, sites should consider working with a third party to identify, register and engage with stakeholders. This could be done through specialist support or organisations who already engage with and have the trust of the population; in some cases, this may be Government agencies, in others it may be CBOs or NGOs.

In many cases, it can be difficult to evaluate displacement impacts or compensation entitlements for stakeholders involved in the designated area. Sites should engage Group SP for guidance in cases where eligibility is difficult to determine. In some cases, other options in the mitigation hierarchy should be considered, such as mitigation or restoration, and tailored solutions should be sought through engagement with and relevant government stakeholders. Offering options for livelihood restoration and/or improvement may be most pertinent and will support a voluntary and peaceful

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E. Securing and maintaining land access
departure/displacement process, particularly in the case of a large or relatively permanent population on the designated area. In this process, it is important to also consider human rights and commercial risks and consequences. Displacement without standard process as per IFC and no mitigation or restoration measures may not only impact on the miners and their dependents but also create risks for the site (tensions, violence, loss of social license to operate, reputational damage).

Options and examples of compensation or restoration measures will in most cases need to be coordinated and implemented with the relevant Government authorities or other third parties. Such measures could involve:

- Supporting the establishment of an alternative area in the vicinity, supporting the formalisation of ASM in this area
- Potentially supporting the improvement of ASM-based livelihoods in this area (removal of overburden, better mining and processing techniques that reduce health, safety and environmental concerns, etc)
- Providing a stipend to return to or move to an alternative area (noting that this needs to be combined with an impact assessment and coordinated with the host community)
- Inclusion in skills development, local employment and entrepreneurial programmes to foster other types of livelihoods (noting though that often is already the ‘alternative’ livelihood, and alternative livelihood projects have often been unsuccessful).
- Providing a stipend to move fixed structures such as small kiosks and shops, buying counters, mineral depots, etc

Sites will need to secure, control and maintain land access from the baseline cut-off date (limited access) and later once the displacement process is completed (no more access). To facilitate this, sites should consider registering stakeholders during the baseline, and establishing security and access controls to the area, allowing access only to registered stakeholders during the time period up to the displacement/relocation. Also see Section 4F.

Depending on the circumstances and relationship with stakeholders, sites may consider establishing a ‘moratorium’ period between the cut-off date and the relocation, allowing stakeholders to continue their activities (or parts of it) for a certain period, during which they should prepare for relocation.