

# UNGC COMPLIANCE

Criterion	Section reference	Specifics in need of attention
<b>Strategy, Governance and Engagement</b>		
Criterion 1	Letter from CEO, Mark Cutifani	Suggested topics (best practice):
The COP describes key aspects of the company's <i>high-level sustainability strategy</i> in line with Global Compact principles	Our business strategy	Impact of broader sustainability trends on the long-term prospects and financial performance of the organisation
	Our sustainability strategy	Major sustainability risks and opportunities in the near to medium term (3-5 years)
	Our approach to risk management and identifying material issues	How broader sustainability trends impact the organisation, in terms of both risks and opportunities
	Project ONE: Business process framework	Social and environmental impact of the organisation's activities
	Awards received during reporting period	Major positive and negative impacts on the company's operating environment and stakeholders
	Responding to the strike in South Africa	Overall strategy to manage sustainability impacts, risks and opportunities in the near to medium term (3-5 years)
	Integrated report: understanding and mitigating our risks	Major successes and failures during the reporting period
Criterion 2	Letter from CEO, Mark Cutifani	Involvement and accountability of management (C-suite) in developing corporate sustainability strategy in line with Global Compact principles and overseeing its implementation
The COP describes effective <i>decision-making processes and systems of governance</i> for corporate sustainability	Our sustainability strategy	Corporate governance structure (Board of Directors or equivalent) and its role in oversight of long-term corporate sustainability strategy and implementation in line with Global Compact principles
	Our sustainability review panel	Goals and incentive schemes for management (C-suite) to promote sustainability strategy in line with Global Compact principles
	Externally developed economic, environmental and social charters	
	Integrated report: Abridged governance report	
Criterion 3	Our stakeholders	Regular stakeholder consultations in the area of human rights, labour, environment and anti-corruption
The COP describes engagement with all important <i>stakeholders</i>	Our approach to risk management and identifying material issues	List of stakeholder groups engaged by the organisation
	External panel review	Process for stakeholder identification and engagement
	Responsible custodianship of water and land	Outcome of stakeholder involvement
	Delivering sustainable community benefits	Process of incorporating stakeholder input into corporate strategy and business decision-making

# UNGC COMPLIANCE continued

Criterion	Section reference	Specifics in need of attention
<b>UN Goals and Issues</b>		
Criterion 4	Letter from CEO, Mark Cutifani	Adoption or modification of business strategy and operating procedures to maximise contribution to UN goals and issues
The COP describes actions taken in support of <i>broader UN goals and issues</i>	Adding value	Development of products, services and business models that contribute to UN goals and issues
	Ensuring safety and health	
	Attracting, developing and retaining our people	Social investments and philanthropic contributions that tie in with the organisation's core competencies, operating context and sustainability strategy
	Our sustainability strategy	
	External panel review	Public advocacy on the importance of one or more UN goals and issues
		Partnership projects and collective actions in support of UN goals and issues
<b>Human rights implementation</b>		
Criterion 5	Managing our supply chain	Commitment to comply with all applicable laws and respect internationally recognised human rights, wherever the company operates (for example the Universal Declaration of Human Rights)
The COP describes robust <i>commitments, strategies or policies</i> in the area of human rights	Responsible Gold	
	Letter from CEO, Mark Cutifani	
	Respecting human rights	The Guiding Principles suggest that this should include a commitment to treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever the company operates
		Statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company
		Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services
		Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties

Criterion	Section reference	Specifics in need of attention
Criterion 6	Respecting human rights	Ongoing due diligence process that includes an assessment of actual and potential human rights impacts
The COP describes effective <i>management systems</i> to integrate the human rights principles	Addressing artisanal and small-scale mining	The Guiding Principles suggest that the assessment:
	Securing our people and assets	<ul style="list-style-type: none"> <li>• Include impacts that the business enterprise may be involved in through its own activities and as a result of its business relationships</li> </ul>
	Responsible Gold	<ul style="list-style-type: none"> <li>• Involve meaningful consultation with potentially affected groups and other relevant stakeholders</li> <li>• Be ongoing and evolving, adapted to size and complexity</li> <li>• Be included in risk management systems</li> </ul> <p>The Guiding Principles also suggest that risks should not be limited to the risks to the company itself (material) but should also include risks to right-holders. Lastly the Guiding Principles suggest that findings from impact assessments should be integrated across relevant internal functions and processes</p> <p>Internal awareness-raising and training on human rights for management and employees</p> <p>Operational-level grievance mechanisms for those potentially impacted by the company's activities</p> <p>Allocation of responsibilities and accountability for addressing human rights impacts</p> <p>Internal decision-making, budget and oversight for effective responses to human rights impacts</p> <p>Processes to provide for/or cooperate in the remediation of adverse human rights impacts that the company has contributed to or cause</p>
Criterion 7	Respecting human rights	System to monitor the effectiveness of human rights policies and implementation, including in the supply chain
The COP describes effective <i>monitoring and evaluation mechanisms</i> of human rights integration	Managing our supply chain	Monitoring and drawing from internal and external feedback, including affected stakeholders
	Responsible Gold	<p>Leadership review of monitoring and improvement results</p> <p>Process to deal with incidents</p>

# UNGC COMPLIANCE continued

Criterion	Section reference	Specifics in need of attention
Criterion 8	Respecting human rights	Outcomes of due diligence process
The COP describes key <i>outcomes</i> of human rights integration	Responding to the strike in South Africa	<p>External and formal reporting of operations or operating contexts that pose risks of severe human rights impacts</p> <p>The Guiding Principles suggest that communications should:</p> <ul style="list-style-type: none"> <li>• Be of a form and frequency that reflect an enterprise's human rights impacts and that are accessible to its intended audiences;</li> <li>• Provide information that is sufficient to evaluate the adequacy of an enterprise's response to the particular human rights impact involved; and</li> <li>• In turn not pose risks to affected stakeholders, personnel or to legitimate requirements of commercial confidentiality</li> </ul> <p>Disclosure of main incidents involving the company</p> <p>The Global Compact Office acknowledges that providing such details may be counterproductive for various reasons related to the protection of human rights, and that confidentiality may, at times, be more effective in righting human rights abuses</p> <p>Outcomes of processes of remediation of adverse human rights impacts</p>
<b>Labour principles implementation</b>		
Criterion 9	Delivering sustainable community benefits	Reference to relevant international conventions and other international instruments (ILO Core Conventions)
The COP describes robust commitments, strategies or policies in the area of labour	<p>Addressing artisanal and small-scale mining</p> <p>Letter from CEO, Mark Cutifani</p> <p>Externally developed economic, environmental and social charters</p> <p>Adding value</p> <p>Managing our supply chain</p> <p>Responsible Gold</p> <p>Respecting human rights</p> <p>Attracting, developing and retaining our people</p> <p>Responding to the strike in South Africa</p>	<p>While the 10 Global Compact principles are based on international conventions, organisations are encouraged to reference these documents explicitly to show detailed understanding of the Global Compact principles' underlying meaning</p> <p>Reflection on the relevance of the labour principles for the company</p> <p>In making that determination, the company should reflect upon:</p> <ul style="list-style-type: none"> <li>• if it has potentially significant labour-related social and economic impacts; and</li> <li>• whether such impact could substantively influence the assessments and decisions of the organisation's stakeholders</li> </ul> <p>Written company policy (code of conduct) on labour</p> <p>Inclusion of minimum labour standards in contracts with suppliers and other relevant business partners</p> <p>Specific commitments and goals for specified years</p>

Criterion	Section reference	Specifics in need of attention
Criterion 10	Ensuring safety and health	Risk and impact assessments in the area of labour
The COP describes effective <i>management systems</i> to integrate the labour principles	Attracting, developing and retaining our people	Allocation of responsibilities and accountability within the organisation
	Securing our people and assets	Internal awareness-raising and training on the labour principles for management and employees  Grievance mechanisms, communication channels and other procedures (for example whistleblower mechanisms) for reporting concerns or seeking advice
Criterion 11	Ensuring safety and health	System to track and measure performance based on standardised performance metrics
The COP describes effective <i>monitoring and evaluation</i> mechanisms of labour principles integration	Managing our supply chain	Audits or other steps to monitor and improve the labour performance of companies in the supply chain
	Our sustainability strategy	Leadership review of monitoring and improvement results  Process to deal with incidents
Criterion 12	Letter from CEO, Mark Cutifani	Outcome of due diligence and follow up efforts to uphold the freedom of association right to collective bargaining
The COP describes key <i>outcomes</i> of integration of the labour principles	Attracting, developing and retaining our people	Outcome of due diligence and follow up efforts to eliminate forced labour
	Respecting human rights	Outcome of due diligence and follow up efforts to abolish child labour
		Outcome of due diligence and follow up efforts to eliminate discrimination
		Disclosure of main incidents involving the company (in light of Marikana)

# UNGC COMPLIANCE continued

Criterion	Section reference	Specifics in need of attention
<b>Environmental stewardship implementation</b>		
<p>Criterion 13</p> <p>The COP describes robust commitments, strategies or policies in the area of environmental stewardship</p>	<p>Externally developed economic, environmental and social charters</p> <p>Addressing artisanal and small-scale mining</p> <p>Cyanide and waste management</p> <p>Letter from CEO, Mark Cutifani</p> <p>Attracting, developing and retaining our people</p> <p>Respecting human rights</p> <p>Integrated report: review of projects</p> <p>www.anglogoldashanti.com – Sustainability: corporate governance and policies</p>	<p>Reference to relevant international conventions and other international instruments (for example the Rio Declaration on Environment and Development)</p> <p>While the 10 Global Compact principles are based on international conventions, organisations are encouraged to reference these documents explicitly to show detailed understanding of the Global Compact principles' underlying meaning</p> <p>Reflection on the relevance of environmental stewardship for the company</p> <p>In making that determination, the company should consider</p> <ul style="list-style-type: none"> <li>• if it has potentially significant environmental impacts; and</li> <li>• whether such impact could substantively influence the assessments and decisions of the organisation's stakeholders</li> </ul> <p>Written company policy on environmental stewardship</p> <p>Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners</p> <p>Specific commitments and goals for specified years</p>
<p>Criterion 14</p> <p>The COP describes effective management systems to integrate the environmental principles</p>	<p>Our sustainability strategy</p> <p>Addressing artisanal and small-scale mining</p> <p>Responsible custodianship of water and land</p> <p>Delivering sustainable community benefits</p> <p>Cyanide and waste management</p> <p>Ensuring safety and health</p> <p>www.anglogoldashanti.com – Sustainability: Corporate governance and policies</p>	<p>Environmental risk and impact assessments</p> <p>Assessments of lifecycle impact of products, ensuring environmentally sound end-of-life management policies</p> <p>Allocation of responsibilities and accountability within the organisation</p> <p>Internal awareness-raising and training on environmental stewardship for management and employees</p> <p>Grievance mechanisms, communication channels and other procedures (for example whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts</p>
<p>Criterion 15</p> <p>The COP describes effective monitoring and evaluation mechanisms for environmental stewardship</p>	<p>Cyanide and waste management</p> <p>Addressing energy security and climate change</p> <p>Responsible custodian of water</p>	<p>System to track and measure performance based on standardised performance metrics</p> <p>Leadership review of monitoring and improvement results</p> <p>Process to deal with incidents</p> <p>Audits or other steps to monitor and improve the environmental performance of companies in the supply chain</p>

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Criterion 16  The COP describes key outcomes of integration of the environmental principles	Cyanide and waste management  Addressing energy security and climate change  Responsible custodian of water	Indicators on uses of materials and energy  Indicators on emissions, effluents, and waste  Indicators on the company's initiatives to promote greater environmental responsibility  Indicators on the development and diffusion of environmentally friendly technologies  Disclosure of main incidents involving the company
<b>Anti-corruption implementation</b>		
Criterion 17  The COP describes robust <i>commitments, strategies or policies</i> in the area of anti-corruption	Integrated report: Abridged governance report  Annual Financial Statements: Governance and remuneration  www.anglogoldashanti.com – Sustainability: Corporate governance and policies	Publicly stated formal policy of zero-tolerance of corruption (D1)  Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)  Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)  Carrying out risk assessment of potential areas of corruption (D3)  Detailed policies for high-risk areas of corruption (D4)  Policy on anti-corruption regarding business partners (D5)
Criterion 18  The COP describes <i>effective management</i> systems to integrate the anti-corruption principle	Integrated report: Abridged governance report  Annual Financial Statements: Governance and remuneration  www.anglogoldashanti.com – Sustainability: Corporate governance and policies	Support by the organisation's leadership for anti-corruption (B4)  Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 and D8)  Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)  Actions taken to encourage business partners to implement anti-corruption commitments (D6)  Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)  Communications (whistleblowing) channels and follow up mechanisms for reporting concerns or seeking advice (D9)  Internal accounting and auditing procedures related to anti-corruption (D10)
Criterion 19  The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption	www.anglogoldashanti.com – Sustainability: Corporate governance and policies	Leadership review of monitoring and improvement results (D12)  Process to deal with incidents (D13)  Public legal cases regarding corruption (D14)  Use of independent external assurance of anti-corruption programmes

# UNGC COMPLIANCE continued

Criterion	Section reference	Specifics in need of attention
Criterion 20  The COP describes key <i>outcomes</i> of integration of the anti-corruption principle	Integrated report: Abridged governance report  www.anglogoldashanti.com – Sustainability: Corporate governance and policies	Outcomes of assessments of potential areas of corruption, where appropriate (D3)  Outcomes of mechanisms for reporting concerns or seeking advice (D9)  Indicators Human Resources procedures supporting the anti-corruption commitment or policy  Disclosure of main incidents involving the company
<b>Value chain implementation</b>		
Criterion 21  The COP describes implementation of the Global Compact principles in the value chain	Our approach to risk management and identifying material issues  Addressing artisanal and small-scale mining  Attracting, developing and retaining our people  Delivering sustainable community benefits  Responsible Gold	Analysis of sustainability risk, opportunity and impact in the value chain, both upstream and downstream  Policy on value chain, including a policy for suppliers and sub-contractors  Communication of policies and expectations to suppliers and other business partners  Monitoring and assurance mechanisms (for example audits/screenings) for compliance in the value chain  Awareness-raising, training and other types of capacity building with suppliers and other business partners
<b>Transparency and verification</b>		
Criterion 22  The COP provides information on the company's profile and context of operation	Letter from CEO, Mark Cutifani  Our business strategy  Our business  Adding value  Our sustainability review panel	Legal structure, including any group structure and ownership  Countries where the organisation operates, with either major operations or operations that are specifically relevant to sustainability  Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)  Primary brands, products, and/or services  Direct and indirect economic value generated for various stakeholders (including employees, owners, government and lenders)

Criterion	Section reference	Specifics in need of attention
<p>Criterion 23</p> <p>The COP incorporates high standards of transparency and disclosure</p>	<p>Compliance and Administration</p> <p>Our approach to assurance</p> <p>Ensuring health and safety</p>	<p>COP uses the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines</p> <p>COP qualifies for Level B or higher of the GRI application levels</p> <p>COP includes comparison of key performance indicators for the previous 2-3 years</p> <p>Board, where permissible, approves COP and other formal reporting on corporate sustainability</p> <p>Relevant sustainability information from COP is included in annual financial report and filings</p>
<p>Criterion 24</p> <p>The COP is <i>independently verified</i> by a credible third-party</p>	<p>Compliance and Administration</p> <p>Our approach to assurance</p>	<p>Accuracy of information in COP is verified against assurance standard (AA1000, ISAE3000)</p> <p>Accuracy of information in COP is verified by independent auditors (such as an accounting firm)</p> <p>Content of COP is independently verified against content standards (GRI)</p> <p>COP is reviewed by a multi-stakeholder panel or by peers (Global Compact Local Network)</p>