

ANGLO GOLD ASHANTI

MANAGEMENT STANDARD		
CULTURAL HERITAGE AND SACRED SITES		
POLICY CUSTODIAN	Group Sustainability Department	
AUTHORISED BY	AngloGold Ashanti Executive Committee	DATE: April 2019
BRIEF DESCRIPTION OF CHANGES		
Revision: 01 (April 2019 Review ratified by the Sustainability Policy and Standards Committee)		
<ul style="list-style-type: none">• Clarification of roles and responsibility in terms of strategy, management plans and procedures.• Requirements to record and manage cultural heritage and sacred site's management processes on CIMS were introduced.		



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1. INTRODUCTION

AngloGold Ashanti recognizes the significance and importance of cultural heritage for current and future generations. This standard provides key requirements to ensure best practice is employed in the protection of cultural heritage and sacred sites in the course of AngloGold Ashanti business. This standard is designed to align AngloGold Ashanti with International Standards, conventions and laws, such as the Convention Concerning the Protection of the World Cultural and Natural Heritage, the International Finance Corporation's Performance Standard 8 on Cultural Heritage as well as the ICMM's Position Statement on Protected Areas, where applicable, as well as country-specific mandates and laws.

2. OBJECTIVES

2.1 The objectives of this Management Standard are:

2.1.1 To promote awareness and protection of cultural heritage within a site.

2.1.2 To ensure that the Company's activities foster full respect for and support, to the extent possible and legally required, for the protection and preservation of all forms of cultural heritage from the adverse impacts of site activities. This will be in keeping with the Company policy that: "we will manage efficiently and safely the resources under our stewardship and respect the values, traditions, and cultures of the local and indigenous communities in which we operate."

3. DEFINITIONS

3.1 For the purposes of this standard, **cultural heritage**¹ refers to both tangible and intangible forms of cultural heritage. The former being **tangible** property and sites having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values, as well as unique natural environmental features that embody cultural values, such as sacred groves. Accordingly, cultural heritage includes what can be referred to as **sacred sites**² which may be parts of the natural landscape such as hills, rocks, trees, springs and offshore reefs. They may be places that are significant because they mark a particular act of creation or relate to a cultural story line. They also include burial grounds and places where particular ceremonies have been held. **Intangible forms** of cultural heritage include cultural knowledge, innovations and practices.

3.2 **Critical cultural heritage**: refers to:

3.2.1 The internationally recognized heritage of communities who use, or have used within living memory the cultural heritage for long-standing cultural purposes; and

3.2.2 Legally protected cultural heritage areas, including those proposed by host governments for such designation.

¹ IFC Performance Standard 8

² Working with Indigenous Communities: Leading Practice Sustainable Development Program for the Mining Industry, Commonwealth of Australia 2007: <http://catalogue.nla.gov.au/Record/4310928?lookfor=historical&offset=114667&max=115769>

- 3.3 A **Heritage Procedure**³: is a specific procedure which outlines the process that will be followed to identify and manage heritage resources (known or those identified in the future), particularly archaeological resources that are encountered during a site's activities (including but not limited to exploration or construction of a new operation). The procedure must be compliant with all applicable law (national, state, provincial and local).
- 3.4 An **Internationally Recognised Practice**: refers to the exercise of professional skill, knowledge, diligence, prudence and foresight that would reasonably be expected from experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally.

4. SCOPE

- 4.1 The requirements of this standard apply to all AngloGold Ashanti sites.
- 4.2 The requirements of this standard apply to cultural heritage regardless of whether it has been legally protected or previously disturbed on the site.
- 4.3 In the case of a non-managed joint venture (JV), AngloGold Ashanti shall ensure that the standards applied by the joint venture comply with those that are acceptable to AngloGold Ashanti and the third party. Where a standard is not in place or available, the parties must adopt a standard which accords with internationally accepted good mining practice.
- 4.4 When entering into a non-managed JV, AngloGold Ashanti must consider whether acceptable standards will be adopted by the third party. If acceptable standards are unlikely to be agreed with the third party, AngloGold Ashanti would not enter into the Joint Venture. Where AngloGold Ashanti participates in a non-managed JV and the third party does not operate in accordance with acceptable standards, this would be grounds for AngloGold Ashanti exiting the partnership.
- 4.5 Onsite contractors and subcontractors are required to adopt this standard unless they have an alternative standard approved in writing by AngloGold Ashanti.

5. ACCOUNTABILITY AND RESPONSIBILITY

- 5.1 Accountability for establishing this standard for the company lies with the Executive responsible for Sustainability, and accountability for implementing this standard lies with relevant Group, Regional and Site Managers.
- 5.2 Implementation accountabilities can be delegated to designated person(s) who must clearly understand their accountabilities and authorities.
- 5.11 Each site must ensure that it has adequate and appropriately experienced resources, including human resources, to implement the standard.

³ Where applicable, government legislation supersedes the procedure as outlined in this standard.

6. NORMATIVE REFERENCES

- 6.1 The following documents shall be referred to and utilised as part of the cultural heritage and sacred sites management system:
 - 6.1.1 International Council on Mining and Metals (ICMM): *Position Statement of Protected Areas*
 - 6.1.2 International Finance Corporation: *Performance Standard 8 – Cultural Heritage*
 - 6.1.3 AGA: *Group Risk Management Standard*
 - 6.1.4 AGA: *Group Risk Management Policy Statement*
 - 6.1.5 *Group Risk Management Guidelines and Risk Assessment and Reporting Matrix*

7. REQUIREMENTS

- 7.1 Each site must develop and maintain a Cultural Heritage and Sacred Sites procedure aligned to this standard detailing the country specific requirements, programmes, initiatives, etc. considering the broad principles stated below
- 7.2 **Internationally Recognised Practices**
 - 7.2.1 In keeping with the International Council on Mining and Metals (ICMM) Position Statement of Protected Areas to which AngloGold Ashanti subscribes, the site must not undertake exploration, or any mining activities in World Heritage Sites,
 - 7.2.2 The site must comply with all relevant laws (national, provincial, state or local) on the protection of cultural heritage, including laws implemented by the host country under the Convention Concerning the Protection of the World Cultural and Natural Heritage and other relevant international law,
 - 7.2.3 Without conflicting with any relevant laws the site must use best endeavours to protect and support cultural heritage by undertaking internationally recognized practices for the protection of cultural heritage, conducting a field-based assessment, and documenting evidence of cultural heritage. This may require retaining the services of qualified and experienced experts to assist in the assessment, and conduct of any field-based studies.
 - 7.2.4 All identified sites declared as World Heritage Sites, and cultural heritage and sacred sites should be demarcated.
- 7.3 **Cultural Heritage Procedures**
 - 7.3.1 The site must develop a procedure aligned to the standard.
 - 7.3.2 The site must conduct baseline studies to identify potential cultural heritage sites.
 - 7.3.3 The site should be positioned and designed to avoid damage to cultural heritage to the extent that this is possible – see 7.5 below.
 - 7.3.4 When the impact on cultural heritage is expected to occur, the site must implement Cultural Heritage Protection Plan as required by applicable laws. In the absence of a legal framework, the site plan must anticipate, at a minimum, the following requirements:

- 7.3.4.1 The site will not disturb any tangible or critical cultural heritage further until an assessment by a competent person is made.
- 7.3.4.2 Record keeping of finds and expert verification procedures,
- 7.3.4.3 Definition of chain of custody instructions for movable finds,
- 7.3.4.4 Clear criteria for potential temporary work stoppages that could be required for rapid disposition of issues related to the finds,
- 7.3.4.5 Outline the roles and responsibilities and the response times required on the part of both project staff and any relevant heritage authority,
- 7.3.4.6 Consultation and disclosure procedures agreed with relevant heritage authority, and
- 7.3.4.7 Process for obtaining the appropriate authority where required to disturb and/or relocate cultural heritage.

7.4 Consultation

- 7.4.1 Consultation will be undertaken in keeping with the Company's standard on Engagement.
- 7.4.2 Where a site may disturb cultural heritage, or is in doubt whether an area of interest is tied to tangible or intangible forms of cultural heritage, sites are expected to complement the studies of experts with the knowledge of traditional or historical communities that have present or held past links to the area (such as: Indigenous Peoples, heritage institutions, national and local museums, cultural institutes, universities and civil societies concerned with historical preservation in general), as well as applicable regulatory agencies. Views and concerns about the way in which the site proposes to deal with cultural heritage should be considered in the site's decision-making process.

7.5 Community Complaints and Incidents

- 7.5.1 In the event that complaints are made regarding impacts on cultural heritage, the standard on Community Complaints and Grievances must be applied.
- 7.5.2 Should site activities result in damage to the cultural heritage and/or sacred sites, the standard on Community Incident Reporting and Management Standard must be applied.

7.6 Removal of Cultural Heritage Artefacts

- 7.6.1 To give recognition to the fact that most cultural heritage artefacts are best protected by preservation in place (since removal is likely to result in irreparable damage or destruction of the cultural heritage), the site must not remove any cultural heritage artefacts, unless the following conditions are met:
 - 7.6.1.1 There are no reasonable technically or financially feasible alternatives to removal, and
 - 7.6.1.2 Any removal of cultural heritage artefacts must be conducted in accordance with all relevant laws or internationally recognised practice, as applicable.

7.7 Critical Cultural Heritage

7.7.1 The site will not significantly alter, damage, or remove any critical cultural heritage. However, in exceptional circumstances, where avoidance is not possible, and the impact may endanger the cultural or economic survival of communities within the host country who use the cultural heritage for long-standing cultural purposes the site will:

7.7.1.1 Meet the requirements of 7.3 on consultation;

7.7.1.2 Consult with and document the informed participation of the affected communities and the outcome of the consultation process; and

7.7.1.3 Appropriately and reasonably mitigate, with the informed participation of the affected communities, any other impacts on critical cultural heritage.

7.7.2 In circumstances where a proposed site is located within a legally protected area or a legally defined buffer zone, the operation, in addition to the requirements for Critical Cultural Heritage cited above in 7.6.1, will meet the following requirements

7.7.2.1 Comply with all applicable cultural heritage laws/regulations or the protected area management plans,

7.7.2.2 Consult the protected area sponsors and managers, local communities and other key stakeholders on the proposed activities,

7.7.2.3 Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area.

7.8 The integrity of the cultural heritage must be assessed on a regular basis to ensure that possible damage, especially cumulative impacts to the heritage sites from the site activities are constantly monitored.

7.9 All processes implemented by site to ensure conformance to this standard should be recorded on the Community Information Management System (CIMS).

8. RECORDING AND REPORTING

8.1 Periodic reporting must be in accordance with regulatory and AGA corporate office quarterly reporting requirements.

8.2 All commitments emanating from the cultural heritage and sacred sites management processes must be recorded in the Community Information Management Systems (CIMS).

9. REVISIONS

This management standard will be reviewed to assess its relevance on a periodic basis (at least every 3 years), and will also be updated in accordance with changes to company policy.

10. GLOSSARY

10.1 **Company:** refers to AngloGold Ashanti

10.2 **Operation:** refers to a producing mine.

10.3 **Project:** refers to an exploration project or a new mine expansion.

10.4 **Site:** is used when referring collectively to producing operations and to exploration and expansion projects.

11. REFERENCES

11.1 International Finance Corporation: *Performance Standard 8 – Cultural Heritage*.

11.2 International Council on Mining and Metals (ICMM) Position Statement of Protected Areas

11.3 Working with Indigenous Communities: Leading Practice Sustainable Development Program for the Mining Industry, Commonwealth of Australia 2007:

<<<http://catalogue.nla.gov.au/Record/4310928?lookfor=historical&offset=114667&max=115769>>>