

ANGLO GOLD ASHANTI

MANAGEMENT STANDARD		
COMMUNITY COMPLAINTS AND GRIEVANCES		
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">• Requirements to record and manage all complaints and grievances on CIMS were introduced.• Requirement to close-out all grievances within 30 days was introduced.• Requirement to monitor grievances on a quarterly basis was introduced.		



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1. INTRODUCTION

Complaints from communities can be expected to arise for any company whose activities have an impact on its stakeholders. For this reason, AngloGold Ashanti requires every site to develop and implement a mechanism to resolve complaints and grievances received from local communities. The Complaints and Grievances mechanism (the “mechanism”) provides local communities with a means to raise complaints and grievances against an AngloGold Ashanti site and for the site to respond and resolve those issues where reasonable and feasible. An effective mechanism should help the site to reduce opportunities for complaints and grievances to escalate into incidents. Although some might assume that stakeholder engagement and economic opportunities attributable to site are sufficient to deal with grievances, the reality shows they are not.

2. OBJECTIVE

The objective of this management standard is to ensure that each site implements a locally and culturally appropriate mechanism. The implementation of this standard further supports AngloGold Ashanti’s values to “uphold and promote fundamental human rights where we do business” and “...contribute to building productive, respectful and mutually beneficial partnerships in the communities in which we operate..”

3. DEFINITIONS

- 3.1 **Complaints:** refers to concerns, negative comments, expressions of displeasure or discontent, which are relatively minor and either brought to the attention of or raised (for example in the media) about the site with regard to its activities or impacts.
- 3.2 **Grievance:** refers to serious concerns, resentment, and allegations, which are made against a site regarding its activities or impacts. These are complaints or issues that are classified as high, major, extreme by a site.
- 3.3 **Mechanism:** the interrelated elements that support implementation of the Complaints and Grievance Management Standard. It consists of activities, responsibilities, timelines, procedures and processes. The key processes within a mechanism are lodging and receipt of a grievance or complaint, acknowledgement, methods of investigation, findings, resolution, communication, sign-off and closure, escalation and grievance prevention.

4. ACCOUNTABILITY AND RESPONSIBILITY

- 4.1 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.
- 4.2 Implementation accountabilities can be delegated to designated person(s) who must clearly understand their accountabilities and authorities.
- 4.3 Each site must ensure that it has adequate and appropriately experienced resources, including human resources, to implement the standard.

5. SCOPE

- 5.1 The requirements of this standard apply to all AngloGold Ashanti sites, country, region and corporate offices.

- 5.2 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.
- 5.3 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.
- 5.4 When engaging with Indigenous Peoples¹, this standard must be applied in conjunction with the Indigenous Peoples Standard.
- 5.5 When engaging with artisanal miners, this standard must be applied in conjunction with the standard on Artisanal and Small-Scale Mining (ASM). When engaging with owners of land lying within the area of the mineral concession and tenements this standard must be applied in conjunction with the requirements of the standard on Land Access and Resettlement.
- 5.6 Any grievance arising from actions of onsite contractors and subcontractors must be dealt with through the site's grievance mechanism. Where or if applicable, the contractor's complaints and grievance mechanism should be incorporated into the site mechanism such that there is one co-ordinated mechanism for the site.
- 5.7 This standard applies to instances of all verbal or written complaints expressed by an individual or a group against a site, its employees, contractors or service providers²
- 5.8 The site is responsible for developing a threshold, as part of the mechanism, beyond which issues that are brought to its attention are characterised as complaints and grievances.
- 5.9 This standard applies regardless of the stage in the project lifecycle and nature of the complaints and grievances, that is, all complaints and grievances must be subject to the process outlined in the section on requirements.
- 5.10 This standard applies only to complaints and grievances expressed at site level before they have escalated to judicial processes.

6. NORMATIVE REFERENCES

- 6.1 The following documents shall be referred to and utilised as part of the community complaints and grievances management system:
 - 6.1.1 International Council on Mining and Minerals: *Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns & Grievances*.
 - 6.1.2 AGA Group Risk Management Standard
 - 6.1.3 AGA: *Group Risk Management Policy Statement*
 - 6.1.4 *Group Risk Management Guidelines and Risk Assessment and Reporting Matrix*
 - 6.1.5 *AngloGold Ashanti Management Standard on Incident Classification and Reporting*

¹ See the Indigenous Peoples Management Standard for the definition of Indigenous Peoples used by AngloGold Ashanti.

² This includes anyone undertaking work for the company.

7. REQUIREMENTS

- 7.1 Given that complaints or grievances can occur from the start of any project, a site must develop and document a mechanism before any complaints are received. This can be done by conducting a baseline study and other project assessment activities which would identify potential issues that could give rise to community complaints³.
- 7.2 The size, current and future impact of the site, historical relationships with the community must be borne in mind when designing the mechanism, such that the design is relevant to the local context.
- 7.3 Where there are legal or regulatory frameworks or requirements for handling community complaints and grievances, the site must first comply with those.
- 7.4 While the site is responsible for ensuring that the mechanism is developed and implemented, input from and involvement of its social partners and stakeholders is required, to enhance awareness of and trust in the mechanism.
- 7.5 The existence of the mechanism and the process for lodging complaints must be publicised as early as possible and also be easily accessible and understandable to all affected⁴ members of the community.
- 7.6 All complaints and grievances must be logged on Community Information Management Systems (CIMS).
- 7.7 All relevant⁵ employees should know this standard and the course of action to be followed in the event that community complaints are communicated through them.
- 7.8 In the event of a complaint being registered, the site's complaint resolution process and the complainant's rights⁶ must be explained to them.
- 7.9 Complaints must be classified as minor, moderate, high, major or extreme in line with the Community Incident and Reporting and Management standard.
- 7.10 Complaints classified as high, major and extreme, are considered grievances and must be reported to corporate office in line with the requirements for reportable incidents in the Company's Incident Classification and Reporting management standard.
- 7.11 The mechanism must be appropriate to the local culture and context, while recognising AngloGold Ashanti's values. Dispute resolution methods must take into consideration special needs of Indigenous Peoples and disadvantaged minorities, where applicable.
- 7.12 The procedure for receiving, addressing, and recording complaints should clearly indicate: the date and nature of the complaint; responsibilities for addressing the complaint; a reasonable timeframe within which the complainant(s) can expect complaints to be addressed; follow up actions required to avoid delays; the final or current decision on the complaint; the most culturally appropriate feedback mechanism and the management actions required to prevent recurrence.
- 7.13 Employees who are accountable and responsible for the mechanism should be appropriately trained.
- 7.14 A timeframe must be indicated within which the complainant(s) can expect the complaint to be addressed, and where possible, resolved or a milestone reached. In instances where the

³ A site should always take steps to prevent complaints and grievances.

⁴ Refer to the standard on Engagement.

⁵ Site management should use their discretion to determine which employees should be inducted in the mechanism based on their level of interaction with communities.

⁶ Such as the right to seek alternative dispute resolution avenues or right to follow-up with the site on the matter.

agreed deadline cannot be met for good reasons, for example, where further investigations are required, an update must be provided, including the reasons for the delay and the revised date for resolution of the complaint.

- 7.15 The action taken to resolve the complaint must be approved by the manager of the site or a member of senior staff who is suitably qualified to assess the effectiveness of the proposed response and/or intervention.
- 7.16 All complaints and grievances must be given due priority and resolution should be obtained within 30 days. Where not possible good reason should be documented and signed-off by the site manager on a monthly basis.
- 7.17 Feedback on outcome must be provided to all concerned with the outcome.
- 7.18 In the event that a grievance cannot be resolved, it may, with the agreement of the relevant community, be referred to third parties for mediation and/or arbitration.
- 7.19 The mechanism must be monitored, and an analysis be undertaken on a quarterly basis to track trends on grievances and complaints and to improve on the efficiency levels of the mechanism.
- 7.20 The mechanism should be reviewed annually, and this should incorporate the outcomes of the quarterly trend analysis.
- 7.21 The mechanism should be audited annually by an independent internal party (for example Internal Audit department).

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 resolution of grievances and complaints must be recorded in the Community Information Management Systems (CIMS).

9. REVISIONS

- 9.1 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.
- 10.5 **Stakeholders:** refers to persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome either positively or negatively. Stakeholders⁷ include locally affected communities and individuals and their formal and informal representatives, government, politicians, religious leaders, civic organisations, and other groups with special interests, the academic community,

⁷ A Guide to Designing and Implementing Grievance Mechanisms for Development Projects.

employees, their families and employee representatives, other businesses, shareholders⁸ and joint venture partners⁹.

11. REFERENCES

The following documents may be consulted for more information:

- 11.1 Center for Social Responsibility in Mining. April 2009. Mining industry perspectives on handling community grievances: << <http://commdev.org/content/document/detail/2457/> >>
- 11.2 Compliance Advisor Ombudsman. June 2008. A Guide to Designing and Implementing Grievance Mechanisms for Development Projects:<< <http://commdev.org/content/document/detail/2269/> >>
- 11.3 Corporate Social Responsibility Initiative, John F. Kennedy School of Government. January 2008. Rights-Compatible Grievance Mechanisms: A Guidance Tool For Companies and Their Stakeholders: << <http://www.business-humanrights.org/Links/Repository/991906> >>
- 11.4 ICMM. October 2009. Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns & Grievances: << <http://www.business-humanrights.org/Categories/Businessorgs/Sectoralbusinessorgs/InternationalCouncilonMiningMetalsICMM> >>
- 11.5 ICMM. May 2009. Human rights in the Mining & Metals Industry: Overview, Management Approach and Issues. May 2009: << <http://www.icmm.com/page/225/our-work/projects/articles/business-and-human-rights> >>

⁸ Shareholder engagement would normally be undertaken in conjunction with the Corporate Investor Relations function.

⁹ A full breakdown of stakeholder component is found in the standard on Engagement.