

ResolveLine Privacy Notice

Introduction

Anglo American Crop Nutrients ("**Company**", "**we**", "**us**" and "**our**") has set up a Complaints and Issues hotline known as "ResolveLine". ResolveLine is a confidential service through which concerns, complaints, or issues about potentially unethical, unlawful or unsafe conduct and practices can be reported, investigated and resolved. Reports can be submitted via multiple channels of communication, including, email, WhatsApp and a web-based submission form, ensuring accessibility and responsiveness.

ResolveLine is open to the Crop Nutrients UK community, which may include Company employees, contractors, suppliers, and members of the community.

Should an individual make a report through ResolveLine, we will process personal data of that individual and of anyone else who may be identified in the report.

If you are an employee of Crop Nutrients or are making a report that concerns an employee of Crop Nutrients, the data controller of any of your personal data that may be processed in connection with ResolveLine is Crop Nutrients Woodsmiths (UK) Ltd. If you are not employed by Anglo American and you have chosen to make a report using ResolveLine, or are the subject of a report made through ResolveLine, the data controllers of any of your personal data contained in that report are Anglo American Services (UK) Ltd, and the most appropriate Group entity that is local to the location of the incident being reported.

The following Privacy Notice describes how and why personal data is processed in connection with ResolveLine. It is intended to comply with our obligations to provide individuals with information about the processing of their personal data under applicable privacy laws.

This Privacy Notice is supplementary to the External Privacy Notice which is [available online](#) and the Employee Privacy Notice which is available to Anglo American employees through the intranet, which together are referred to as the "Privacy Notices". The content of these Privacy Notices continues to apply to ResolveLine, in addition to the information set out below.

If you have any questions about this Privacy Notice, have any concerns relating to your personal data, or want to exercise any of the rights granted by applicable laws, please contact our Data Protection Team at dataprotection@angloamerican.com.

What data do we process?

You have the option to submit your report anonymously and without providing any contact details by using the ResolveLine webpage submission form. If you do so, none of your personal data will be processed in connection with your report and we will be unable to provide feedback.

If you choose to disclose your identity, the data that we process will include your first name, last name, email address and contact number. The content of your report will also be processed in connection with your personal information.

If you are the subject of a report made by another individual, we will process your name and contact information. We will also process the reported information, including the nature of the issue. This may include information about alleged or proven criminal offences, where permitted by applicable laws. We will also process further information during any subsequent verification and investigation into the report.

Notwithstanding the basis on which the complaint is made, all personal data provided through the ResolveLine system will be managed confidentially by the Company. The Company recognises that an individual may not wish to be identified and will do everything possible to protect the person's identity. If it proves impossible to assess, evaluate, and investigate the reported concerns without revealing the individual's identity, the investigation team dealing with the matter will discuss with the individual whether and how to proceed. In some cases, confidentiality cannot be absolutely guaranteed as the very fact of the investigation may serve to reveal the source of the information, the statement of the person raising the concern may be needed as part of evidence against the perpetrator, or legal proceedings at a later stage may require the individual to appear as a witness.

How does the company collect data?

Any personal data processed in connection with the ResolveLine system will be collected from the individual making the report. In addition, further personal data may also be generated and processed through the course of any investigation that is carried out, into the report, including:

- the identity, responsibilities and contact information of the persons who are involved in receiving or processing the complaints or issue report;
- contents of the report;
- information gathered in connection with the verification of the report details;

- report on the verification procedure; and (as applicable)
- follow-up.

What are the purposes for which data is processed and what is our legal basis for carrying out the processing?

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so (which may be via an update to this Privacy Notice).

The main purposes for processing your personal data as part of ResolveLine are in connection with our legitimate business interests. This includes processing data in the following ways:

- Facilitating the raising of concerns about serious misconduct and conduct contrary to our Values and Code of Conduct, investigating those concerns, and (where the concerns are found to be valid) taking appropriate action to address the inappropriate conduct and prevent similar concerns from arising in the future
- Acting ethically and responsibly as a business, complying with laws, and protecting the health and safety of our employees, contractors, suppliers and members of the community
- Fostering a culture of openness and accountability and
- Building trust and contributing to the overall fairness of the Company's social performance.

The above interests may involve processing personal data to:

- receive, discuss and (where applicable) sanitise the report;
- request additional information to substantiate the report;
- collate information received in reports and make that information available to designated teams for investigation;
- investigate the complaint or issue; and

- provide feedback to the individual making a report (where relevant) and make recommendations to the Company.

While ResolveLine is not intended as an emergency service, and you should contact your local authorities if there is a life-threatening issue, in some cases we may process your data to safeguard vital interests to save or protect someone's life.

Sensitive personal data will only be processed where authorised by applicable laws or based on your consent. For example:

- If the report made through ResolveLine relates to discrimination in the workplace, we may process relevant special categories of personal data on the basis of carrying out obligations and exercising specific rights in the field of employment and social security and social protection law and other applicable laws;
- If the report made through ResolveLine relates to other allegations of discrimination, we may process relevant special categories of personal data on the basis of substantial public interest and other applicable laws. For example, we may process special categories of personal data relating to equality of opportunity or treatment;
- If the report made through ResolveLine relates to an infringement of applicable laws to the detriment of the Company, we may process relevant special categories of personal data in order to establish, exercise or defend a legal claim; and
- If the report made through ResolveLine could amount to an allegation of criminal activity, we may process that personal data on the basis of substantial public interest and other applicable laws. For example, we may process that personal data in order to prevent or detect unlawful acts.

Retention of personal data

Your personal data will be retained for as long as it is appropriate to investigate the details of the complaint or issue and (where relevant) to complete actions relating to the outcome of any investigation. Once the complaint or issue has been fully investigated, your records will be anonymised 13 months after the case has been closed.

We keep the data for this length of time so that we can manage repeat behaviour and patterns of complaints.

Disclosures of personal data

We will make every effort to ensure that your personal data is only accessed by or shared with relevant teams on a 'need-to-know' basis, with each 'investigating' team only able to

see their own complaints and not other teams' areas. Personal data may be shared with various individuals and teams within the Company, such as:

- The Human Resources team who will review the reports, take appropriate action and provide feedback to the complainant;
- The Social Performance Transformation team who will assess the complaints and determine appropriate outcomes;
- The Complaints team who will coordinate with internal teams to gather updates and ensure relevant information is shared with the complainant.

The Company also works with several suppliers to process your personal data for the purposes described in this Notice above. Where these suppliers act on our behalf, they must only process your personal data in accordance with our instructions. The categories of suppliers that we use include IT and technology service providers.

We may also share your personal information in other situations, including:

- When required to do so by law, regulation or court order;
- With relevant individuals or organisations if we have determined a situation to be an emergency. For example, sharing information with the relevant and appropriate emergency services or health professionals, and/or with your next of kin or emergency contacts;
- In response to a legitimate request for assistance by the police or other law enforcement agency; and
- In connection with the sale, purchase or merger of a business (for example, to ensure that your case continues to be investigated, even if a company is sold).

International transfer of personal data

The IT and technology service providers may host data outside the UK or European Economic Area (EEA).

In each case of transfers of personal data outside the EEA, personal data is protected by entering into a data transfer agreement with the recipient company, based on standard contractual clauses approved by the European Commission and the Information Commissioner's Office's (ICO) International Data Transfer Agreement (IDTA).

Where permitted by applicable laws, you may have a right to request a copy of any data transfer agreement under which your personal data are transferred, or to otherwise have access to the safeguards used. Any data transfer agreement made available to you may be redacted for reasons of commercial sensitivity. To request sight of these, contact dataprotection@angloamerican.com.

Complaints

If you wish to make a complaint about how we use your information, please contact the Anglo American Data Protection Team via email at dataprotection@angloamerican.com. If you're unhappy with our response, you may also contact the [Information Commissioner's Office](#).

Your rights

Subject to certain exemptions, you may be able to make the following requests in relation to your personal information:

- Request access to your personal information (commonly known as a "subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove your personal information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

Please note that, not all of these rights are absolute and, in some cases, for example, we may refuse a request to exercise particular rights if complying with it meant that we are no longer able to meet our contractual obligations to you, or if we had a legal obligation or right not to comply with the request. However, we will keep you informed as to the actions that we can take when you make your request.

Notice of changes

We will occasionally update this Privacy Notice and, where appropriate, may notify you using any of the contact details we hold for you to inform you of any material changes prior to implementing them. We encourage you to periodically review this Notice to be informed of how we use your information. Where our use of your personal data changes, and where applicable data protection laws require us to do so, we will obtain your consent to any such changes.

This privacy notice was last updated on 13 July 2025.