



AngloGold Ashanti Limited \ Reg. No.1944/017354/06

76 Jeppe Street \ Johannesburg \ 2001 \ PO Box 62117 \ Marshalltown \ 2107 \ South Africa  
 el +27 (0)11 637 6000 \ Fax +27 (0)11 637 6624 \ Website: [www.AngloGoldAshanti.com](http://www.AngloGoldAshanti.com)

<b>POLITICAL DONATIONS &amp; POLITICAL ACTIVITIES POLICY</b>		
<b>POLICY CUSTODIAN</b>	Corporate Office Government Relations Department	
<b>AUTHORISED BY</b>	AngloGold Ashanti Executive Committee	<b>DATE:</b> 28 July 2014
<b>APPROVED BY</b>	Board of Directors	<b>Date:</b> 30 October 2014



<b>This document is uncontrolled in hardcopy format</b>			
DOCUMENT IDENTIFICATION	VERSION	EFFECTIVE DATE	PAGE
GOV REL STD	Final	30 October 2014	Page 1 of 6



## Table of Contents

1. POLICY STATEMENT
2. DEFINITIONS
3. OBJECTIVE
4. APPROVALS AND ACCOUNTABILITY
5. SCOPE
6. REQUIREMENTS
7. DISCLOSURE AND REPORTING
8. POLITICAL ACTIVITY BY DIRECTORS AND EMPLOYEES



This document is uncontrolled in hardcopy format			
DOCUMENT IDENTIFICATION	VERSION	EFFECTIVE DATE	PAGE
GOV REL STD	Final	30 October 2014	Page 2 of 6



## 1. POLICY STATEMENT

AngloGold Ashanti is committed to being a good corporate citizen in the context of the laws and practices of the countries in which we do business.

AngloGold Ashanti is adopting a discretionary approach when making political donations or contributions. However, given historical practices in countries such as the USA, Brazil, Colombia and, until recently South Africa, AngloGold Ashanti may at its own discretion and in line with this policy make political donations in these countries in which we operate.

Any political donation must be permitted by local laws and regulations, and must be made to a political party or a political organization and not to individual political candidates.

Such political donations would require that a strong business case is presented on the basis of particular local circumstances, and the procedures set out in this policy are strictly observed.

## 2. DEFINITIONS

A “political donation” is any gift, loan, advance or deposit of money or in kind or service of value, made for the purpose of funding the activities of a political party, political organization or political candidate. Such activities include any election for national, federal, country, state, province, municipal or local office, or a political ballot initiative (e.g. a referendum) or other fund raising activities in support of a political party, political organization, or political candidate.

Community and social investment spend in local communities is governed by the management standard on Socio-Economic Development. Any such spend which is in the nature of political donations must be made in accordance with this policy.

The formal, paid, hiring out of company facilities for the use of official state or government events (such as a local or state or federal government event celebrating a national day, for example), as opposed to a particular political party’s rally, does not qualify as a political donation. Nonetheless, such activities are governed by AngloGold Ashanti’s values and compliance policies, including AGA’s Policy on Anti-Bribery and Anti-Corruption, as well as current applicable legislation.

## 3. OBJECTIVES

This policy does not aim to encourage the practice of making political donations. Rather, it aims to ensure that the process of making political donations is supported by a strong business case for doing so and is presented and managed in accordance with this policy, the company’s values and business principles, the protection of shareholder value, and the company’s commitment to transparency, public disclosure and good governance.



This document is uncontrolled in hardcopy format			
DOCUMENT IDENTIFICATION	VERSION	EFFECTIVE DATE	PAGE
GOV REL STD	Final	30 October 2014	Page 3 of 6



In these exceptional cases, AngloGold Ashanti's financial support for political parties, political organizations or political candidates will aim to promote democracy in those jurisdictions, support public policy issues that impact the company's business interests, and / or enhance the company's capacity to understand political developments.

No political donation may be given in order to seek any advantage for AngloGold Ashanti.

#### 4. APPROVALS AND ACCOUNTABILITY

The process and accountabilities for approving political donations are as follows:

##### 4.1. All Donations

For any political donation, the advance approval of the relevant Executive Vice President or Chief Operating Officer, together with the Chief Executive Officer, is required. Any such decision should then be reported to the next Excom meeting as "information only", as well as to the next Social, Ethics and Sustainability Committee.

##### 4.2. Donations in excess of USD100 000

For any political donation(s) that, singly or in aggregate, exceeds USD100 000, the advance approval process discussed in 4.1 above is required. In addition,

- 4.2.1. Once the regional EVP or COO and CEO have reached agreement that there is a case for making a donation, a written proposal must then be submitted to Executive Committee (Excom) for consideration. The requirements for this proposal are stipulated below. The proposal must also be reviewed for consistency with the applicable legal and compliance requirements and policies.
- 4.2.2. Should Excom approve the proposal, the Excom recommendation must then be taken to the Board's subcommittee dealing with political donations, which is currently the Social, Ethics and Sustainability Committee.
- 4.2.3. Final accountability for approval of such political donations rests with the Board of AngloGold Ashanti, following the recommendation of the Social, Ethics and Sustainability Committee.

##### 4.3. Donations in kind

Indirect financing of a political party, political organization or political candidate of any value is subject to the same process for approvals as monetary donations. Examples of indirect financing include lending company vehicles to political parties, political organizations or political candidates; providing food at political rallies; taking advertising space in party publications or paid-for attendance and/or promotional activities at party congresses.

An annual report on all political donations made in any financial year must be circulated to the board sub-committee and based on an analysis of the report the board sub-committee may set new standards for future donations.



This document is uncontrolled in hardcopy format			
DOCUMENT IDENTIFICATION	VERSION	EFFECTIVE DATE	PAGE
GOV REL STD	Final	30 October 2014	Page 4 of 6



## 5. SCOPE

This standard applies to all countries in which AngloGold Ashanti operates.

## 6. REQUIREMENTS

### 6.1. PROCESS REQUIREMENT

Written proposals to Excom must provide:

- 6.1.1. the justification and business case for making a political donation, including how the donation aligns with the objectives set forth in Section 3 above;
  - 6.1.2. a brief summary of the local laws and regulations governing political donations in the relevant jurisdiction and a conclusion that the political donation requested is legal in that jurisdiction;
  - 6.1.3. an explanation of why the political donation does not violate local and international bribery and corruption laws (including the US Foreign Corrupt Practices Act);
  - 6.1.4. the timing of the donation and, where applicable, the nature of the election in question (for example, state, national, presidential);
  - 6.1.5. which political parties, political organizations, and/or political candidates are recommended as recipients, including a brief outline of their basic political position and policies, and a motivation for the contribution, bearing in mind the objectives and restrictions outlined above;
  - 6.1.6. the exact value (or, if in kind, a best possible estimate) of the donations, in local currency and the US dollar equivalent at that time;
  - 6.1.7. the manner in which money will be transferred to beneficiaries, for internal audit purposes; and
  - 6.1.8. in the case of in-kind donations, the nature and scope of the assistance being offered.
- 6.2. All political donations must comply with all current applicable laws and regulations in the jurisdictions in which the donations are made (including the US Foreign Corrupt Practices Act) and any other regulatory requirements the company may be subject to.



This document is uncontrolled in hardcopy format			
DOCUMENT IDENTIFICATION	VERSION	EFFECTIVE DATE	PAGE
GOV REL STD	Final	30 October 2014	Page 5 of 6



6.3. Even where applicable laws would permit AngloGold Ashanti to make a political donation, Excom may decide to reject the donation proposal or forbid future donations.

6.4. AngloGold Ashanti's name or logo may not be used for any political purposes whatsoever by beneficiaries of a political donation.

6.5. Charitable donations are not to be used as a substitute or cover-up for political donations.

## 7. DISCLOSURE AND REPORTING

Political donations must be made with the full understanding by all beneficiaries that AngloGold Ashanti will publicly disclose its political donations in the company's annual reporting, as well as by any other means of public disclosure recommended by management, or required by law and regulation.

## 8. POLITICAL ACTIVITY BY DIRECTORS AND EMPLOYEES

8.1. It is acceptable for directors and employees of the company to participate in political activities of their choice that are lawful (save for the taking of any political office), express their views on political issues, and make contributions to and support a government, political party, political organization or political candidate.

8.2. Individuals who engage in political activities must make clear that they do so for their personal purposes, do not represent AngloGold Ashanti, are not acting on behalf of or on the authority of the company, that the contributions they make are from their own resources and not subject to reimbursement by the company, and that they will refrain from using their position in the company to influence any person to make political contributions in support of a government, political party, political organization or political candidate.

8.3. Employees who wish to take up public service roles must notify their line manager in writing in advance and discuss how to minimize any impacts on their official duties and to address any potential conflicts of interest that might arise including seeking guidance from Group Compliance. In the event of any dispute the decision of the company will be final and binding on the employee.



This document is uncontrolled in hardcopy format			
DOCUMENT IDENTIFICATION	VERSION	EFFECTIVE DATE	PAGE
GOV REL STD	Final	30 October 2014	Page 6 of 6

