RioTinto

The Way We Work

Our Code of Conduct

February 2023

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1. Introduction

The Way We Work is our Code of Conduct ('our Code'). It sets the foundation for doing business the right way and reflects our significant ambitions for a safe and sustainable future. We acknowledge that we have made mistakes in the past, where our conduct did not align with our values and what is expected from us. We are determined to apply the lessons learned to improve and evolve on this exciting journey to become a better Rio Tinto.

The values, commitments and behaviours set out in our Code provide clarity on what is expected from each of us and will allow us to deliver responsibly. Our Code applies to everyone who works for Rio Tinto, including our Board, Executive Committee, employees and third parties working under the direction of Rio Tinto. The Code is important for every one of us – we cannot succeed unless we all uphold the values, commitments and behaviours outlined in the Code. We also require the business partners we work with to have comparable policies, standards and procedures.

a) Upholding our Code

The way we treat our people, our partners, the environment, the communities where we work, and how we conduct business is what makes us a responsible partner of choice. Our Code of Conduct highlights Rio Tinto's commitments in each of these areas, and the behaviours needed from all of us to uphold these commitments and contribute to Rio Tinto's success.

Throughout our Code, we refer to both Rio Tinto as a company and everyone who works for Rio Tinto. Each topic includes a section titled "What does this mean for me?" which sets individual expectations for everyone working within Rio Tinto. We all play a vital role in delivering on our commitments and need to live by the Code and refer to it when faced with a question or dilemma. In addition, we have a separate Supplier Code of Conduct which includes clear obligations for our vendors and suppliers.

We comply with applicable laws everywhere we work. We also apply the Code when it is stricter than the law, actively choosing to do what is right, not just what is legal.

Breaking the law, our Code, or any of our policies and standards compromises our values. Anyone who breaks the law and/or our standards could face disciplinary action up to and including termination.

b) Our responsibilities

As members of the Rio Tinto team, we need to meet our responsibilities every day and everywhere we work. This is essential for Rio Tinto's success and the exciting journey we are on.

We all should:

- **Live our Code and values with integrity, honesty and accountability, translating our commitments into practice.**
- **Create a workplace where people feel safe to speak up, respected and included – so that we can all be our best selves.**
- **Listen and respond with empathy to any concerns shared.**
- **Escalate concerns to the relevant department and, where needed, ask for advice from our leader, senior leaders, and any member of the People (HR), Ethics and Compliance, and Legal teams.**

While the Code applies to all of us at Rio Tinto without exception, leaders* have additional responsibilities to champion the behaviours expected in the Code, create safe spaces for their teams and set a caring tone from the top. Leaders should share the Code and relevant resources with their team members and raise awareness about how we are all expected to behave.

** Anyone to whom individuals or teams report to as part of their work. This could include line managers, people leaders, team leaders and supervisors, as well as more senior staff members.*

2. Our purpose

Our purpose – Finding better ways to provide the materials the world needs – captures Rio Tinto at its best and explains our contribution to society now and as we learn and grow.

"Finding better ways" speaks to our drive for both innovation and continuous improvement, whilst also emphasising how solutions are delivered – with impeccable Environmental, Social and Governance (ESG) performance. It suggests that we are striving for new ways to do things, and deeper partnerships to solve problems, create win-win and meet opportunities.

"To provide the materials the world needs" connects our contribution to everyday life, making our purpose meaningful for our customers, stakeholders and society. We are purposefully not talking about mining, processing or extraction. Fundamentally it is all about satisfying the needs of society (for example, this can extend to recycling).

3. Our values

Our values are simple, human and inclusive. They are qualities that are essential to our future. We can all make our values come to life by focusing on the positive behaviours that we want to see more of.

Care

We act with care by prioritising the physical and emotional safety and wellbeing of those around us. We respect others, build trusting relationships and consider the impact of our actions. We look for ways to contribute to a better future for our people, communities and the planet.

Courage

We act with courage by showing integrity, speaking up when something is not right and taking decisive action when needed. We are not afraid to try new things. We respond positively in difficult situations and demonstrate commitment to achieving shared goals.

Curiosity

We act with curiosity by inviting diverse ideas and collaborating to achieve more together than can be done alone. We are continuously learning, creatively looking for better and safer ways of doing things. We draw inspiration from others and the world around us.

4. Making ethical decisions

We understand that the Code will not always provide answers to every question. When we are unsure how to approach a difficult situation or decision, we should always refer to our ethical decision-making model to help us make the right choice. Applying the ethical decision-making model helps us to pause, reflect and consider our choices and their potential impacts when making decisions.

Living our values of Care, Courage and Curiosity in every decision we make

Pause and reflect

Am I involving the right people?

Am I clear on potential risks and impacts?

Respect views

Am I seeking diverse perspectives?

Am I really listening without bias?

Consider options

Am I being bold and innovative?

Am I raising any unexpected consequences?

Test understanding

Am I aware of all the facts?

Am I causing harm to people, the planet, relationships or reputation?

Be decisive

Am I comfortable with my decision?

Am I able to explain and publicly stand by my decision?

It's not always straightforward.

If unsure, ask for help: Leaders, Ethics & Compliance, People (HR), Legal, myVoice

5. myVoice and raising concerns

We need to have the courage to speak up when something is not right. By speaking up, we can act on issues that have the potential to cause harm to people, our shared world and our business. In practice, this means reaching out to someone we trust – a leader, a colleague or any member of the People (HR), Ethics and Compliance or Legal teams. We can also raise concerns through myVoice, our confidential reporting program, which is available to all Rio Tinto employees, contractors, suppliers, service providers, trainees, joint venture partners, community members and other stakeholders.

We can raise concerns about any behaviours that do not align with our values or might break the law. These can cover violations of our standards, policies and procedures (including this Code), issues relating to harmful and disrespectful behaviours (including sexual harassment, racism, discrimination, bullying and harassment), human rights, safety, environment, financial reporting, fraud or business integrity issues in general.

We know that feeling safe to raise issues is important. When we use myVoice we can choose to keep our identity anonymous. At Rio Tinto, we preserve confidentiality and keep those who voice concerns in good faith safe from retaliation. We respond to all reports promptly and in a way that is respectful, fair and caring. We protect those who speak up. More details can be found in the myVoice standard.

Accessing myVoice is easy:

Web platform:
EthicsPoint - Rio Tinto

Email:
myvoice@riotinto.com

Telephone numbers available per country in:
EthicsPoint - Rio Tinto

a) Health, wellbeing, safety and security

Nothing is more important than the health, wellbeing, safety and security of our employees, contractors and the communities where we operate. Caring for each other is part of who we are and the way we work, every shift, every day.

Our commitments

- We believe all fatalities, injuries and occupational illnesses are preventable, and we are committed to ensuring everyone goes home safe and healthy every day.
- We seek to create a healthy and safe culture through strong and empathetic leadership and active employee engagement.
- We work hard to create a workplace free from psychological harm where our people can thrive and raise any concerns openly. We provide counselling and support programs to our people when needed.
- We provide health and safety awareness training to our employees, leaders and on-site contractors.
- We expect others we work with, including consultants, agents, contractors and suppliers to respect and follow our health and safety requirements, and we provide them with the support needed to do so.
- We identify, evaluate and proactively manage risks to ensure the security and resilience of our operations.
- We report and investigate all incidents and seek to learn from these and continuously improve.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Follow the health and safety standards and stop work when a task is putting my safety – or that of others – at risk.
- Understand and identify health and safety risks in my daily work, taking steps to control them.
- Make sure I am fit for work every day. This means not being under the influence of alcohol or drugs, being well rested, and being physically and mentally fit to perform my job.
- Share my ideas on how to improve safety, health and wellbeing.
- Report all health and safety concerns immediately.

Further resources

- Health, Safety, Environment and Communities Policy
- Health, Safety, Environment and Security Standards and Procedures (employees only)

6. Our people

b) Equity, diversity and inclusion

We work in more than 30 countries and our people come from all over the world. We are committed to building a diverse and inclusive workforce because a workplace where everyone belongs and feels proud is a key strength and allows us to create a better Rio Tinto.

Our commitments

- We offer the same opportunities to all our people based on merit. We do not discriminate based on race, gender identity or expression, nationality, ethnic origin, religion, age, sexual orientation, marital status, family dynamics, disability, neurodiversity, social class or union activity.
- We actively build diverse teams. We have ambitious targets to improve the representation of under-represented people, including women and Indigenous peoples.
- We ensure that the way we work is transparent, fair and free from bias, and we value different perspectives, voices and cultures.
- We always look for ways to learn, improve and evolve to create a safe, respectful and inclusive work environment every day, for everyone.
- We report on the diversity of our workforce in line with applicable international and local requirements.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Treat others equally and with kindness, inviting different perspectives.
- Recognise my own biases and how these may impact others, reflecting on my behaviours to ensure my actions contribute to a respectful and inclusive environment.
- Am true to our values of care, courage and curiosity, and speak up when things do not feel right.

Further resources

- Inclusion and Diversity Policy

6. Our people

c) Preventing harm

We believe everyone should be treated with dignity and respect and have the opportunity to reach their full potential. We all have a responsibility to prevent harmful behaviours, including bullying, harassment, sexual harassment, violence, racism and other forms of discrimination. Through effectively investigating reports of harmful behaviours, taking action when needed and learning from our history, we strive to create workplaces that are respectful and free from abuses of power and psychological and physical harm.

i. Bullying and harassment

Bullying and harassment have significant negative and devastating impacts for individuals, colleagues and the wider workplace.

Our commitments

- We do not accept bullying, intimidation or harassment of any kind, whether in our workplace or when working with any of our business partners.
- We train our people to prevent, identify and respond to situations of harmful behaviour, including bullying and harassment.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Take action if I see any form of bullying or harassment.
- Never engage in any disrespectful behaviours that may cause physical or psychological harm to another person.
- Address any inappropriate behaviours directly or speak to a trusted leader, a team member from the People (HR) team, or using myVoice, our confidential reporting program.

Further resources

- Employment Policy

c) Preventing harm

ii. Sexual harassment

Sexual harassment often begins with everyday sexism and disrespect. Sexism, sex-based harassment and sexual harassment can lead to significant adverse psychological effects, such as anxiety, depression and fear as well as job-related impacts like decline in performance, absenteeism and damage to interpersonal relationships.

Our commitments

- We do not tolerate any form of sexual harassment or sex-based harassment, including from our business partners, such as contractors and suppliers.
- We seek to provide safe workplaces and residential facilities to prevent the risk of sexual or sex-based harassment and sexual misconduct.
- We strive to eliminate instances of everyday sexism in our operations and practices, challenging sexist views, comments and actions.
- We support those who have experienced sexual and sex-based harassment.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Support and promote our commitment to a workplace free from all sexism, sex-based harassment, and sexual harassment.
- Never engage in sexism, sex-based harassment, or sexual harassment.
- Speak up if I have been subject to sexism, sex-based harassment, or sexual harassment or if I have witnessed or heard of someone who has. The reporting channels available include a trusted leader or colleague, the People (HR) team, and the confidential reporting program, myVoice.

Further resources

- Employment Policy

c) Preventing harm

iii. Racism

Racism has very real impacts on those who are subjected to it, impacting confidence, self-esteem, work performance, psychological safety, and overall wellbeing. It can be subtle, obvious, intentional or unintentional. However, what matters is the impact of this behaviour – not the intent.

Our commitments

- We do not tolerate racism in any form.
- We conduct cultural awareness training which considers diversity and differences in races and cultures.
- We promptly and thoroughly investigate any reports or complaints of racist behaviour.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Treat everyone respectfully, equally and fairly, regardless of race, colour or ethnic origin.
- Never behave in ways which reinforce negative stereotypes or prejudices based on people's race, colour or ethnic origin, including through jokes, comments, slurs or assumptions.
- Challenge racist behaviours and actively learn about racism, making the most of the training provided by Rio Tinto.
- Speak up when I experience or witness racist behaviours, through a trusted colleague, leader, People (HR) team or through the confidential reporting program, myVoice.

Further resources

- Employment Policy

c) Preventing harm

iv. Workplace-related violence

All employees, contractors and business partners have a right to work in an environment free from violence. At Rio Tinto, we want everyone to feel safe both at work and at home.

Our commitments

- We do not tolerate violence of any kind.
- We do not allow anyone to carry weapons on our sites.
- We train our people to step in and safely and effectively help in situations of workplace violence.
- We support victims of domestic violence with a support program which covers all our employees.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Support and promote a workplace free from any form of violence by behaving respectfully and calmly with all colleagues.
- Listen with empathy to colleagues who may experience domestic violence and show them where they can find help both in and outside of Rio Tinto.
- Immediately contact our security providers, the Rio Tinto Security Team, or the local authorities if someone is in imminent danger or I suspect a threat of workplace violence.

Further resources

- Employment Policy

a) Respecting human rights

Our commitment to human rights is core to our values. It is fundamentally about treating people with dignity and respect – our employees and contractors, workers in our value chain, communities in which we work, and others affected by our activities. We also seek opportunities to promote access to, and positively impact on, human rights. From exploration to closure, respect for human rights starts with our everyday actions.

Our commitments

- We respect all internationally recognised human rights.
- We conduct human rights assessments to identify salient human rights impacts and prevent human rights risks at our operations and within our value chain. These may include issues such as labour rights, modern slavery, the rights of Indigenous peoples, community health and wellbeing.
- We work with our business partners to conduct human rights due diligence and communicate our expectation that they adhere to internationally recognised human rights.
- We take steps to prevent sourcing minerals from conflict zones and we are transparent about where our minerals come from. We work hard to prevent conflict minerals from entering our value chain.
- We engage broadly, including with communities, civil society organisations and others to understand how we may be impacting on human rights.
- We recognise the important role human rights defenders play in protecting and promoting human rights.
- We work with security providers to help maintain safe and secure operations, while respecting human rights.
- We are committed to providing access to grievance mechanisms for our workforce, community members affected by our operations, workers in our value chain and others to communicate their concerns. We also commit to regularly review the effectiveness of these mechanisms.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Treat everyone with dignity and respect, to create a workplace culture we all want and deserve, where human rights are not only respected, but also promoted.
- Complete any human rights training assigned to me so that I am familiar with internationally recognised human rights and know how to respect human rights in my daily work.
- Communicate our human rights expectations to the rest of our workforce, suppliers and other business partners and look out for any red flags.
- Report and address any potential or actual adverse human rights impacts.

Further resources

- Communities and Social Performance Standard
- Human Rights Policy

7. Our shared world

b) Engaging with communities

We aim to be caring, authentic and transparent and build trusting relationships and partnerships with the communities in which we operate. Our goal is to respect and connect with our communities. We recognise that as we invest in communities, they invest in us by giving time, social capital and access to their land and infrastructure. This mutual contribution supports the realisation of communities' goals and aspirations and produces long-term shared benefit.

Our commitments

- We engage and share information transparently and ethically.
- Wherever we operate, we work with communities to understand the social, cultural, environmental, and human rights impacts of our activities. We take action to avoid, mitigate and manage adverse impacts and contribute to positive outcomes for host communities and society.
- We actively encourage feedback and meaningful engagement with communities so we can integrate local perspectives into decision-making. We honour and follow through on commitments made with communities.
- We are aware of power imbalances that may exist when we engage with community groups, especially vulnerable people, and seek to create a fair and respectful environment to facilitate honest discussions on an equal footing.
- We work with governments to share the economic benefits of developing a country's mineral resources with society. We prioritise local employment, local suppliers and local and regional economic development.
- We work with communities and other partners to deliver locally driven programs that reflect community priorities and deliver broad based community benefits.

7. Our shared world

b) Engaging with communities

What does this mean for me?

As a member of the Rio Tinto team, I:

- Engage with members, employees and contractors from local communities in a way that respects diversity and their culture.
- Build strong relationships with the local communities based on active listening, transparency and mutual benefit.
- Report grievances raised by community members and other stakeholders so they can be addressed.
- Consider how our actions and activities impact the communities and environment around us and find new ways of doing things to reduce this impact wherever I can, integrating community perspectives into decision-making.
- Seek advice from the Communities and Social Performance team when engaging with host communities on the company's behalf and responding to requests for support.

Further resources

- Communities and Social Performance Standard

7. Our shared world

c) Indigenous peoples

As guests on the land where we operate, we need to consider our impact at every stage, whether we are planning, operating or closing a facility. We aim to develop lasting relationships with Indigenous peoples based on respect for their rights, culture and heritage, and our desire to learn and understand their needs and aspirations. Our aim is for Indigenous peoples to truly benefit from partnering with us. This is the foundation of our social licence to operate.

Our commitments

- We recognise the rights and interests of Indigenous custodians and owners of the land on which we live and work around the world in line with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). We recognise and respect their unique connection to land, waters and the environment.
- We acknowledge our past mistakes, and we are determined to apply the lessons we have learned to work collaboratively and transparently with Indigenous peoples.
- We aim to achieve the Free, Prior and Informed Consent of Indigenous communities with which we work. As members of the International Council on Mining and Metals (ICMM), we support the commitments outlined in ICMM's Position Statement on Indigenous Peoples and Mining.
- We want to build genuine partnerships with Indigenous peoples. We are determined to strengthen how we engage with Indigenous peoples in every country in which we work.
- We seek to ensure Indigenous peoples have a stronger voice in the decisions that affect their rights and interests, including over the land on which we operate.
- We recognise, value and endeavour to understand the significance of the cultures and heritage of our host communities.
- We invest in the careful and respectful management of cultural heritage and seek ways to co-manage its protection with Indigenous peoples.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Engage and partner respectfully with Indigenous peoples.
- Actively seek to understand Indigenous peoples' history, culture, places, stories, objects and practices.
- Perform my work in a way that minimises or avoids adverse impacts on Indigenous peoples, e.g., always respecting their right to their traditional lands and not endangering their cultural heritage.
- Have the courage to speak up if something does not look or feel right.

d) Environment

We have a responsibility to protect the environment and use shared resources adequately to maintain the health, safety and livelihoods of local communities. Preventing and minimising adverse environmental impacts is also essential to sustain our shared ecosystems, planet and natural resources for future generations. Our products are crucial for low-carbon infrastructure, but metals and minerals also have a significant carbon footprint which we need to address while we work to tackle climate change. We also need to manage site closures adequately to contribute to a sustainable economy and prevent negative impacts on the biodiversity, water, land, employment and livelihoods of nearby communities.

Our commitments

- We recognise that land, air, water, soil, energy and nature are shared natural resources and we commit to their responsible use. We partner with Indigenous and local communities to improve our natural resource management and to achieve socially and culturally acceptable environmental performance.
- We identify, assess and proactively manage environmental risks, developing and implementing plans and controls to prevent and mitigate our environmental impacts. We strive to go beyond legal compliance and seek to apply international best practice.
- We are transparent about our environmental risks and impacts and report externally on them. We also report on our greenhouse gas emissions and our use of carbon. We encourage our stakeholders across the value chain to also report on their emissions.
- We support the development of the circular economy by keeping our products in use, minimising and reprocessing waste and regenerating natural systems.
- We are committed to decarbonising our operations and partnering to reduce the emissions linked to our customers' activities.
- We invest in nature-based solutions to help protect, restore and sustainably manage the natural environments. These will in turn help to sustainably minimise the long-term effects of climate change.
- We engage with international efforts to tackle climate change and align ourselves with ambitious global agreements to reduce carbon emissions and enhance environmental resilience.
- We aspire to leave a positive legacy for future generations post closure. We do this in partnership with our stakeholders, including Indigenous peoples, governments, employees and host communities, embedding closure considerations throughout the life of our assets.

d) Environment

What does this mean for me?

As a member of the Rio Tinto team, I:

- Care about the environment and understand the environmental risks and potential negative impacts present in my area of work. I take steps to mitigate these risks and ensure controls remain in place and in working order.
- Integrate sustainability considerations in my decision-making to use natural resources responsibly, avoid wherever possible new impacts to nature and reduce my impacts on the climate, including by reducing energy and water consumption, and recycling and reusing resources.
- Consider the long-term effects of environmental impacts to our host communities and future generations.
- Report all environmental concerns immediately.

Further resources

- Closure Standard (employees only)
- Environment Standards (employees only)

8. Our partners

a) Working responsibly with our third parties

We work with many third parties, including customers, suppliers, contractors, intermediaries, distributors, agents, advisers, joint venture partners, industry associations and other organisations. It is crucial to know and carefully select third parties that we can partner with responsibly and that share our values.

Our commitments

- We conduct risk-based due diligence before we engage with our third parties to ensure that we know who we are really working with. We keep complete and retrievable records of these findings and make business decisions accordingly.
- We are committed to responsible sourcing. During the supplier due diligence process, we consider the working conditions, environmental practices, safety standards and human rights policies of our higher risk suppliers and their supply chains.
- We apply risk-based monitoring of our third parties to ensure they continue to meet our requirements in relation to health and safety, human rights, worker welfare, bribery and corruption, the environment, communities and social performance.
- We communicate our standards of behaviour to suppliers and expect them to follow our Supplier Code of Conduct in their operations and supply chain.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Ensure that I know our third parties and that any identified risks are mitigated prior to engaging with them.
- Ask for advice or raise any concerns if I believe we are not engaging responsibly with a third party or if a third party is violating the law or not meeting our standards of behaviour.

Further resources

- Know Your Third-Party Procedure (employees only)

b) Governments, international organisations and civil society

Our partnerships with governments, international organisations, civil society and industry associations are essential to ensure we work responsibly, sustainably and successfully, helping to address complex societal challenges such as climate change, human rights violations and corruption.

Our commitments

- We build lasting relationships with governments, international organisations and civil society, and engage in a respectful and collaborative manner.
- We partner with multilateral organisations, such as the World Bank, the International Finance Corporation, the United Nations, and the Organisation for Economic Co-operation and Development. We also take part in multi-stakeholder initiatives together with governments such as the Extractive Industries Transparency Initiative and the Voluntary Principles on Security and Human Rights initiative.
- We are transparent about the industry associations and collective action schemes we participate in, and we push these organisations to adopt high standards in relation to sustainability and environmental protection.
- We engage on public policy and legislative issues that affect our business. We provide relevant information and share our experiences to help in the creation of robust policy, regulation and legislation.
- We respect every country's political process and do not get involved in political matters. We do not make any type of payments to political parties or political candidates.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Promote a culture of open, constructive and transparent dialogue with government, international organisations and civil society, and maintain relationships based on respect and integrity.
- Only support political parties, candidates, or campaigns in my own time and with my own money, in my personal capacity, and never in connection with Rio Tinto.
- Speak with the External Affairs team for guidance on how to engage with external stakeholders and respond to their queries.

Further resources

- Role of Civil Society Organisations

a) Countering bribery and corruption

i. Bribery and corruption

Corruption has significant negative impacts on societies, especially vulnerable groups, and hampers development. It is bad for business and it can have devastating personal consequences for anyone involved in a bribery or corruption case. Our culture, business practices, processes and systems are key to maintaining our integrity and allowing us to keep our licence to operate.

Our commitments

- We do not engage in bribery or corruption in any form. We do not offer, pay or accept bribes, no matter where we operate, no matter what the situation is, and no matter who is involved. Nor do we allow our agents, intermediaries or other third parties to do so on our behalf.
- We comply with all anti-corruption laws, requiring our employees, contractors and third parties to comply.
- We recognise the heightened risks of corruption when dealing with public officials and take appropriate steps to address these. We never offer facilitation payments or favours when negotiating with governments, public officials or Indigenous peoples' representatives.
- When employees or third parties working for Rio Tinto refuse to pay a bribe or to act unethically, they will receive full support, even if it means that we lose business as a result.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Comply with all anti-corruption laws and adhere to our Business Integrity Standard and Procedure, which provide guidance on how to avoid bribery and corruption.
- Never offer, give or allow bribes or anything of value which could influence other parties to behave improperly, and never ask for or accept bribes in any form.
- Understand that special rules apply whenever we, or our representatives, work with government officials and when required seek guidance from Ethics and Compliance on engaging with government officials.
- Reject all facilitation payment requests unless personal safety is at risk. I report any such requests, solicitations of bribes and suspected or observed cases of corruption to a leader, the Ethics and Compliance team or myVoice.

Further resources

- Business Integrity Standard
- Business Integrity Procedure (employees only)

9. Our business practices

a) Countering bribery and corruption

ii. Conflicts of interest

Conflicts of interest arise when our personal interests clash or appear to clash with our responsibilities at Rio Tinto. Disclosing and adequately managing interests is essential to prevent corruption and maintain stakeholders' trust.

Our commitments

- We provide processes and systems to disclose and manage conflicts of interest.
- We encourage and support everyone who reports actual or potential conflicts of interest.
- Where conflicts of interest exist, we put in place an action plan to manage the situation.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Ensure my personal activities, interests and relationships do not conflict with my responsibilities at Rio Tinto, nor give me an unfair personal advantage or prevent me from making impartial decisions.
- Actively disclose any actual or potential personal activities, interests or relationships that can cause a conflict of interest and I adhere to any agreed action plans to manage any conflict of interest identified.
- Report conflicts of interest that may not have been disclosed or are not being managed to a leader, the Ethics and Compliance team or myVoice.

Further resources

- Business Integrity Procedure (employees only)
- Business Integrity Standard

9. Our business practices

a) Countering bribery and corruption

iii. Gifts and hospitality

Gifts and hospitality on a modest scale are sometimes used to recognise and strengthen working relationships among business partners. However, depending on their value, frequency or circumstances, they can be viewed as improperly influencing business decisions and may constitute or be perceived as a bribe.

Our commitments

- We do not receive, promise, authorise, solicit, exchange, agree or give any inappropriate or excessive gifts or hospitality to third parties.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Only offer, give or accept gifts or hospitality that are modest, occasional, transparent, reasonable, appropriate, or culturally recognised offerings associated with legitimate business purposes.
- Adhere to the gifts and hospitality requirements of our Business Integrity Standard and Procedure and as required disclose and seek pre-approval for giving and receiving gifts, meals, hospitality and travel.

Further resources

- Business Integrity Standard
- Business Integrity Procedure (employees only)

a) Countering bribery and corruption

iv. Anti-money laundering

Money laundering is the concealment, transfer or use of money or assets gained from criminal activity in otherwise legitimate business activities. Laundered money might also be used to finance terrorism. Money laundering is a serious crime which has significant negative impacts on society and the economy.

Our commitments

- We comply with all laws relating to the prevention of money laundering and terrorist financing.
- We screen and monitor our partners and other third parties to identify money laundering and terrorist financing risks. We will never knowingly engage with a third party who is involved in money laundering and terrorist financing.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Am familiar with and adhere to relevant laws on the prevention of money laundering and terrorist financing when relevant to my position.
- Understand money laundering and terrorist financing risks and how they can materialise.
- Report suspected money laundering or terrorist financing to a leader, the Ethics and Compliance team or myVoice.

Further resources

- Business Integrity Standard
- Business Integrity Procedure (employees only)

b) Sanctions and trade controls

As a global business mining, processing and marketing commodities, we place great importance on trading responsibly. Complying with applicable sanctions and trade controls laws and regulations is critical to avoid civil and criminal penalties for our company and employees, as well as financial and reputational harm.

Our commitments

- We comply with applicable sanctions and trade control laws and regulations.
- We understand the restrictions on who we can sell to and whom we can buy from, and, unless authorised or licensed to do so, we do not deal with sanctioned countries / territories or sanctioned persons.
- We do not tolerate any evasion or circumvention of sanctions.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Adhere to our Sanctions Standard and all sanctions and trade laws that apply to Rio Tinto activities.
- Ensure third party due diligence is completed on all new third parties to avoid dealing with a sanctioned party. I monitor for changes in the sanction status of any third parties I engage with.
- Consider the origin of our imports and the destination of our exports.
- Report any concerns if I become aware of or suspect a potential violation of sanctions or trade control laws by Rio Tinto or a counterparty to the Legal team or myVoice.

Further resources

- Sanctions Standard (employees only)
- Export Controls Procedure (employees only)

c) Competing fairly

We believe free and fair competition creates the best outcomes for everyone, including our business, employees, customers and suppliers, as it encourages us to improve and innovate. Anti-competitive behaviour can expose our company and employees to civil and criminal penalties, as well as financial and reputational harm.

Our commitments

- We respect all applicable competition (or antitrust) laws. This includes not sharing competitively sensitive information or entering into agreements with our competitors which involve price fixing, limiting output, allocating customers or dividing markets.
- We do not obtain information unlawfully or communicate false information about our competitors, suppliers or customers.
- We provide training on competition law risks and support everyone in making the right decisions.
- We monitor for anti-competitive behaviour and take appropriate steps to address potential breaches.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Adhere to our Competition Standard and Guidance Note (employees only) and comply with applicable competition laws.
- Do not share competitively sensitive information when interacting with competitors or potential competitors.
- Seek advice from the Legal team if I have any queries or concerns regarding competition law, or our Competition Standard and Guidance Note (employees only).
- Complete the competition training required for my role.

Further resources

- Competition Standard

9. Our business practices

d) Tax transparency

Tax transparency and accountability are key to earning the trust of our stakeholders, acting sustainably, and contributing to beneficial outcomes for the communities where we operate. Our tax payments help build and maintain hospitals, schools and roads, and provide jobs and training opportunities where we work.

Our commitments

- We comply with tax laws and apply our internal policies and standards, such as the Group Tax Policy, to ensure transparent and accountable tax practices.
- We pay the right amount of tax at the right time.
- We are committed to transparent tax reporting and publish an annual Taxes Paid Report setting out our tax and economic contributions. We disclose the details of our tax payments to governments and ensure our stakeholders are regularly informed about our approach to tax.
- Where we access tax incentives offered by government authorities, we do so transparently and in line with the relevant legal requirements.
- We actively promote transparent and responsible tax practices and engage with governments, business groups and civil society on initiatives to advance tax transparency.

What does this mean for me?

As a member of the Rio Tinto team, I:

- **Adhere to the Group Tax Policy and follow tax legislation and regulations.**
- **Immediately report any suspicions of misconduct relating to tax payments.**

Further resources

- Tax Policy

e) Company property and records

Using company property and resources responsibly is vital to building a culture of respect, care and trust. It prevents losses to the company resulting from dishonest behaviours such as theft and fraud, or from preventable negligence. We also demonstrate that we are trustworthy partners to our stakeholders by maintaining accurate, timely and transparent records.

Our commitments

- We are committed to safeguarding company property and financial resources.
- We put in place adequate policies, procedures and controls, with the objective of preventing fraud, theft and other misconduct.
- We train our people to protect company property and resources and use them responsibly.
- We keep true and accurate records of all company financial and non-financial resources and transactions to ensure transparent and accurate reporting.
- We maintain strong internal controls to ensure that our financial statements are accurate.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Adhere to Rio Tinto's policies and procedures relating to the use and protection of company property and records, taking steps to protect company property and resources from misuse, damage, loss or deceitful behaviour.
- Respect company property and use it appropriately, never taking or using it for my own benefit or for a non-company purpose.
- Am mindful when using company electronic resources such as email, internet, computers and phones. I can occasionally use these resources for personal reasons if it does not impact company systems, incur undue costs for the company or interfere with my work.
- Document all transactions and dealings in an accurate, timely, honest and transparent manner. I protect company documents and never destroy or remove company records unless authorised to and always meet document retention obligations.
- Speak up if I suspect any form of fraud or dishonesty.

9. Our business practices

f) Intellectual property

By protecting our intellectual property and respecting that of others, we maintain our competitive advantage and foster innovation. This supports the growth of our business and builds value.

Our commitments

- We protect our intellectual property (including patents, copyright, trademarks and trade secrets) and monitor for unauthorised use of our intellectual property by others.
- We respect the intellectual property of others, such as our suppliers, customers and competitors. We only use others' intellectual property when authorised to do so.
- We conduct adequate research to check that we have the freedom to process, test and market our products in the countries in which we work, without using someone else's intellectual property.
- We recognise that Indigenous cultural and intellectual property belongs to Indigenous peoples, their communities, and to Indigenous enterprises. We treat Indigenous cultural and intellectual property with respect, which includes observing protocols that determine the time and manner of sharing that intellectual property.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Protect Rio Tinto's intellectual property, guard against unauthorised use and only share information relating to it when authorised to do so by my leaders.
- Uphold the intellectual property rights of others by only using intellectual property that I am permitted to use and adhering to any agreements we have made.
- Keep accurate records when conducting research and developing original work and inform our leaders if I have developed new intellectual property, to ensure it is appropriately protected.
- Report any potential breach of our intellectual property or that of third parties.

Further resources

- Intellectual Property Guidance Notes (employees only)

g) Data privacy

We need people to trust us with their personal data so that we can operate our business. If we ask for more personal data than we need or use personal data for purposes that people do not expect, we can lose that trust. Data privacy breaches can also cause harm to people – such as through fraud, identity theft, embarrassment or humiliation.

Our commitments

- We strive to comply with all privacy and data protection laws whenever and wherever we process personal data. This includes ensuring that our personal data processing is:
  - Fair and transparent – we are open about why we need personal data and what we are going to do with it.
  - Proportionate and limited – we process the least amount of personal data in the least intrusive way and only for as long as necessary to achieve the specific business objective.
  - Secure – we access personal data only as needed or as authorised and store it carefully.
- We recognise that data privacy is not just about legal compliance – it's also about behaving with integrity. That means acting responsibly with personal data and thinking about data privacy from the perspective of each person. We balance our company's interests with the privacy interests of the people we work with.
- We process personal data that is necessary to conduct our business – and we do not go beyond that – whether in relation to our staff, shareholders, suppliers, customers or communities, or other people we do business with.
- When we need to share personal data – whether with our staff or external service providers – we make clear the importance we place on data privacy and the standards we require.
- We respect data privacy rights such as rights to access, review, correct and delete personal information.

What does this mean for me?

As a member of the Rio Tinto team, I:

- **Adhere to our Data Privacy Standard and applicable data privacy laws.**
- **Report any data privacy incidents to my regional Data Privacy Lead, including breaches of data security that have resulted in unauthorised disclosure of, or access to, personal data.**
- **Seek advice from my regional Data Privacy Lead or the central data privacy team in Ethics and Compliance when I need help in applying the Data Privacy Standard or if I have any concerns.**

Further resources

- Data Privacy Standard

9. Our business practices

h) Cyber security

Rio Tinto's cyber security risk is a business risk, not just a technology risk. Actively managing cyber risks is vital to ensuring the safety of our people and preventing significant loss or damage to our business such as through operational down time, reputational damage, fines and litigation costs.

Our commitments

- We take the monitoring and protection of technology assets and the safety of our people very seriously. We manage our cyber risks through investments in people, processes and tools to improve our cyber security.
- We continuously monitor Rio Tinto's global technology infrastructure to identify and stop cyber issues as they emerge.
- We maintain strong cyber security awareness through our cyber security training and awareness program, regular communication on cyber security topics and targeted education campaigns.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Understand that cyber security is also my responsibility and what I do with my electronic devices can weaken or strengthen Rio Tinto's cyber security.
- Adhere to our Acceptable Use of Information and Electronic Resources Standard.
- Complete the mandatory cyber awareness training.
- Remain vigilant and report anything suspicious to the Cyber Security team.
- Never consciously try to bypass any cyber security control. If faced with challenges because of a cyber security control, I ask for help from the Cyber Security team.

Further resources

- Group Procedure for Information and Cyber Security (employees only)
- Group Standard for Acceptable Use of Information and Electronic Resources (employees only)

i) Confidential information

Confidential information is a regular part of doing business. Safeguarding confidential information is crucial to protect the company's interests, as well as our people, communities, suppliers, shareholders and customers.

Our commitments

- We protect confidential information in accordance with relevant laws, regulatory and contractual requirements.
- We ensure that all employees and third parties know how to protect and store confidential information.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Adhere to our Acceptable Use of Information and Electronic Resources Standard.
- Always protect the company's confidential information as well as the confidential information entrusted to me by others.

Further resources

- Group Standard for Acceptable Use of Information and Electronic Resources (employees only)

j) Insider dealing

Insider dealing is unlawful, regardless of the purpose or motive for doing it, or whether a profit is made. Breaching securities laws, including insider dealing and market abuse laws, has serious consequences for our company and anyone involved, and may result in criminal and civil penalties.

Our commitments

- We follow applicable insider dealing laws.
- We train our people to refrain from misuse or perceived misuse of confidential information for their own or for another person's financial or personal benefit.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Adhere to our Securities Dealing Policy and comply with applicable insider dealing laws.
- Never act on or share inside information with anyone else, including my family and friends.

Further resources

- Securities Dealing Policy

k) Transparent communications

It is our responsibility to be transparent about the impact our work can have on people, communities and the environment. It is only by communicating openly and honestly that we can build trust in line with our values.

Our commitments

- We are open and honest in our communication, sharing information constructively and acknowledging that we can make mistakes.
- We comply with our market disclosure obligations by promptly and accurately sharing material information that may affect the price of Rio Tinto's shares.
- We share accurate information about our operations and financial performance with our stakeholders, including investors, regulators and media.
- We make clear to our employees that before communicating externally about Rio Tinto, including on their own social media, internal approval processes should be followed.

What does this mean for me?

As a member of the Rio Tinto team, I:

- Speak to the Group Media Relations team and obtain authorisation before engaging with media on Rio Tinto's behalf.
- Am aware of Rio Tinto's market disclosure obligations, when relevant to my role, and uphold them.
- Ensure that all information I share regarding Rio Tinto, including financial and other reporting, is accurate and transparent.
- Communicate responsibly, honestly and in line with Rio Tinto's values when speaking on behalf of our company. When speaking in a private capacity on matters relating to Rio Tinto, for example on social media, I ensure that I am truthful, make clear my affiliation to Rio Tinto, and protect the company's reputation.

Further resources

- External Communications Standard (employees only)
- Disclosure and Communications Policy

Appendix

Definitions

Bribery occurs when someone directly or indirectly offers, promises or gives a financial or other advantage to any person, or authorises any of these actions, in order to improperly influence an outcome or action.

Bullying is repeated and unreasonable behaviour towards another person that has an intimidating, offensive, punishing or frightening effect, whether deliberately or not, and infringes upon an employee's personal dignity, self-esteem and life opportunities.

Carbon footprint is the total amount of greenhouse gases (including carbon dioxide and methane) that are generated by our actions.

Circular economy refers to a working system of production and consumption based in avoiding and reducing waste and pollution, keeping products and materials in use by sharing, leasing, reusing, repairing, refurbishing and recycling them, and regenerating natural systems.

Community, in the context of mining projects or operations, is generally used to describe the inhabitants of immediate and surrounding areas who are directly affected in some way by the project's or operation's activities. They are also likely to have strong cultural and historical connections to the project or operation area. They may or may not currently reside on the land or use it for livelihood purposes.

Confidential information includes technical information about products or processes, vendor lists, pricing, marketing or service strategies, non-public financial reports, and information on asset sales, mergers and acquisitions.

Conflicts of interest arise when we or someone close to us has a personal interest or duty, which is at odds with Rio Tinto's interests, or there is a perception that interests may not be aligned.

Conflicts of interest can take many forms.

Some examples include:

- when we have family members or friends who are beneficiaries of, affiliated to, or work for a potential or current Rio Tinto supplier, customer or government who engages or may engage with us
- when we have family members or friends who also work for Rio Tinto, and who may be affected by decisions we make, or we know about
- when we have another job outside of Rio Tinto or have a secondary business or arrangement which impacts our commitments and responsibilities to Rio Tinto

Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

Cultural heritage is dynamic and can include music, food, belief systems, buildings, kinship systems and connection to landscape. At its heart are the people for whom stories, knowledge, practices and art, are key parts of their identity.

Cyber security is how individuals and organisations reduce the risk of cyber attacks. Cyber security's core function is to protect the devices we all use (smartphones, laptops, tablets and computers), and the services we access from theft or damage. It's also about preventing unauthorised access to the vast amounts of personal information we store on these devices, and online.

Data privacy is about the processing of personal data.

- **Personal data** means all information relating to any identifiable individual.
- **Process** means anything and everything we can do with personal data – whether collecting, using, disclosing, updating, storing, accessing, deleting, viewing or doing anything else with it.

Facilitation payments are small payments made to government officials to secure or speed up a routine process or performance of an official action.

Family and domestic violence or abuse occurs when one person in a current or former relationship, uses violence and abuse to exercise power and control over another person. This includes behaviour that is physically, sexually, emotionally, spiritually, psychologically or economically abusive; and/or threatening and coercive or aimed at controlling or dominating the other person through fear. Family and domestic violence and abuse can occur in any relationship including current or former partners, spouses, carers or paid support workers, parents, guardians, adult children and adolescents.

Appendix

Definitions continued

Fraud is when you deliberately make a dishonest statement or do an act, concealment or omission which is intended to deceive someone for your (or those close to you) advantage or their disadvantage. Fraud includes situations when an employee obtains personal gain or advantage at Rio Tinto's expense, including through the deliberate misuse or misappropriation of Rio Tinto's resources or assets. This includes the production, submission or processing of fictitious or altered invoices, falsification of company books and records, claiming of false expenses, manipulation of vendor master data or bank accounts, and dishonestly concealing or not disclosing important information when required to do so.

Gifts include anything of value, from items of nominal value such as prizes, raffles at external events, small thank you gifts, culturally recognised gestures/ offerings to items of larger value such as jewellery, expensive goods, medical care etc.

Harassment is an action or behaviour that is usually repeated or persistent, which makes anyone feel offended, humiliated, scared, distressed or threatened. Harassment can be physical, verbal or non-verbal, and may include offensive jokes, comments, emails or text messages, tweets or posts on social media, images, unwanted visits, physical gestures and/or other actions.

Hospitality refers to meals with third parties, functions and celebrations involving entertainment, sporting events, cultural events, fundraising events, concerts, plays, etc.

Indigenous peoples are the earliest known inhabitants of a territory who occupied the land prior to the arrival of settlers with different cultural, ethnic and geographic origins who often marginalised the original inhabitants. The term is usually used to refer to Aboriginal peoples internationally, although usage in different places varies. Defining characteristics of Indigenous peoples are that they: i) identify with a specific territory and have a close attachment to its natural environment ii) have a collective name and sense of solidarity iii) are widely recognised and self-identify as belonging to that group iv) share a common ancestry or origins and history (often of dispossession) and v) have a distinctive shared culture, and sometimes shared languages.

Insider dealing is if you have access to inside information, participating in any of the following activities amounts to insider trading:

(a) dealing in Rio Tinto securities or securities of another company to which the inside information relates (whether you do it or someone else does it for you)

(b) advising, procuring, recommending, encouraging, or inducing another person to deal in Rio Tinto securities or securities of another company to which the inside information relates; and/or

(c) disclosing inside information to any other person (whether directly or indirectly), if you know or ought reasonably to know that the other person may use the Inside Information to deal (or advise, procure or encourage someone else to deal) in Rio Tinto securities or securities of another company to which the inside information relate.

Inside information is confidential information that you learn as part of your job about Rio Tinto or another company:

(a) that is not generally or publicly available; and

(b) that if publicly available, it would or would be likely to have a significant or material effect on the price or value of Rio Tinto's or another company's securities (judged by whether a reasonable investor would use the information to make an investment decision).

Intellectual property consists of intangible proprietary rights resulting from creative work. Examples include, but are not limited to, inventions and innovations, software, specifications, drawings, designs, texts, images and logos. In the mining industry, this might involve prospecting methods, production processes, materials - chemical compositions and new ways of managing waste materials. Examples of Indigenous Cultural and Intellectual Property rights include art, and knowledge of plants and agriculture.

Money laundering is the concealment, arrangement, acquisition, transfer or use of improperly obtained monies or assets (i.e., proceeds of crime) including the proceeds of terrorist activity, in otherwise legitimate business dealings.

Appendix

Definitions continued

Nature-based solutions, also called natural climate solutions where they help mitigate climate change or reduce carbon emissions, are a range of approaches that focus on developing and maintaining healthy, well-managed ecosystems.

Property can be both physical such as vehicles, electronic equipment and facilities, and non-physical such as software, information and intellectual property and financial such as cash, bank deposits, investments, loans, receivables and payables.

Psychological safety is a shared belief across a team that the team is a safe environment in which members can take interpersonal risks without fear of humiliation or intimidation, such as calling out inappropriate behaviour, challenging hierarchy and providing feedback.

Racial discrimination is any distinction, exclusion, restriction or preference based on race, colour, descent, or national or ethnic origin which has the purpose or effect of denying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms. Examples of racism: verbal abuse, exclusion from conversations and activities, racial slurs and jokes, racial stereotyping and bias, insensitive questions offending a person's ethnicity and heritage, not being invited to certain meetings, being overlooked for training and development opportunities and limited career progression because of race, colour or ethnicity.

Records include both financial information such as financial statements, expense reports, accounting records and non-financial information such as safety and environmental records, human resources records and meeting minutes.

Sanctions are restrictions on activities imposed by a governmental authority or an intergovernmental organisation as a punishment or to achieve a desired policy objective. Restrictions may include embargoes, asset freezes, export controls, limitations or prohibitions on interacting and doing business with specified countries ("sanctioned countries"), individuals and entities ("sanctioned parties").

Sex-based harassment is unwelcome conduct based on an individual's actual or perceived sex. It includes slurs, taunts, stereotypes, or name-calling as well as gender-motivated physical threats, attacks, or other harmful conduct.

Sexism is any act, gesture, visual representation, spoken or written words, practice, or behaviour based upon the idea that a person or a group of persons is inferior because of their sex. Everyday sexism can take many forms, including insults, demeaning jokes, comments devaluing views or voice because of a person's gender, role stereotyping, assumptions that caring and careers don't mix, unwarranted gender labelling.

Sexual harassment is conduct of a sexual nature which is unwanted or unwelcome and which has the purpose or effect of being intimidating, hostile, degrading, humiliating or offensive. Examples include non-consensual acts of a sexual nature, physical contact and advances, sexually toned remarks, displaying explicit videos or images on a screen, sexual demands by words or actions, sexually explicit emails or messages.

Sustainability is meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Terrorist financing includes receiving or providing money or property where it's intended, or there's reasonable cause to suspect that it may be used for, the purposes of terrorism and laundering terrorist property (i.e., proceeds of terrorist activity).

Third party is an entity that we buy goods or services from, sell goods or services to, host communities where we operate, and our business partners and investees.

Trade controls are restrictions on trading activities imposed by a governmental authority or an intergovernmental organisation which are typically import and export limitations.

Violence is the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death or psychological harm.

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