

Voluntary Principles on Security and Human Rights

Annual Report to the Voluntary Principles Initiative 2021

1. Commitment to the Voluntary Principles on Security and Human Rights

Rio Tinto is a proud founding participant of the Voluntary Principles Initiative (VPI) and is committed to following the Voluntary Principles on Security and Human Rights (VPSHR). Our company policies on security and human rights draw explicitly on the VPSHR and we are committed to integrating the VPSHR into all our security arrangements. We believe in the potential of the VPSHR to help companies to respect human rights. This is particularly important in regions where it is challenging to provide responsible security for mining operations, including where local private or public security providers may need additional training to carry out their duties with respect for human rights, and where engagement of public officials is important to promote respect for human rights.

We continue to support the development of the VPSHR into a truly global standard. This includes working towards both home and host governments strengthening their commitment to implementation and working together to ensure that companies in the extractive sector, and their security providers, are able to and do operate with respect for human rights.

Our commitment to the VPSHR is set out in our Group-wide <u>human rights policy</u>¹ and <u>The Way We</u> <u>Work</u>, our global code of business conduct. Our security and human rights work is guided by our broader human rights approach, which is set out in our <u>human rights policy</u> and on our <u>human rights</u> <u>webpage</u>. We are committed to respecting internationally recognised human rights as set out in the <u>Universal Declaration of Human Rights</u>. This includes respecting the human rights of our people,² the communities where we live and work and others affected by our activities and business relationships.

Our <u>policies and standards</u> on employment; health, safety and environment; communities and social performance (CSP) and inclusion and diversity contain human rights commitments, including relating to security and human rights.

In addition to the VPSHR, we implement the <u>UN Guiding Principles on Business and Human Rights</u> (UNGPs). We have also voluntarily committed to upholding a range of other international standards and guidelines, including the <u>OECD Guidelines for Multinational Enterprises</u>, the International Finance Corporation's Environmental and Social Performance Standards, the <u>International Council</u> on Mining and Metals (ICMM) Mining Principles and the <u>UN Global Compact's Ten Principles</u>.

The actions we take to respect human rights help us maintain our licence to operate by building strong relationships with local communities, our people and business partners. Our human rights performance, including how we have addressed significant incidents, is discussed in our online <u>Annual Report</u> and <u>Sustainability Fact Book</u>. You can read about how our VPSHR commitment ties into our CSP work in our <u>Why Human Rights Matter guide</u>. You can also read about how our VPSHR commitment ties into our modern slavery work in our annual <u>Modern Slavery Statement</u>, which highlights the security-related work we undertake to help manage our modern slavery risks.

To help avoid security-related human rights violations, we conduct security and human rights analyses of our security operations, and we ensure our people are trained in accordance with these principles as needed. We provide practical guidelines, toolkits and training on implementing the VPSHR. Our multimedia VPSHR training is mandatory for all private security personnel and our introductory Group-wide human rights online training, available to all of our people, includes information on our security and human rights commitment. We impose strict controls on the use of force and minimise the use of armed security at our sites. We work with external stakeholders, as well as public and private security providers, to promote understanding and implementation of the VPSHR.

¹ Updates to the Rio Tinto human rights policy along with the Communities and Social Performance Standard are currently under consultation and will be finalised in 2022. Group Security is being consulted as a key stakeholder on these updates.

² For the purposes of this report, our people refers to our employees and core contractors. Core contractors refers to category 1 and category 2 contractors and any external contractors, agents, consultants and other service providers who perform internal duties or roles having access to internal systems or who otherwise act for and on behalf of Rio Tinto.

In 2021, our Security Area of Expertise (Group Security) continued to support sites with VPSHR implementation and conflict prevention. They also strengthened our security and human rights governance framework by conducting security and human rights reviews³ to ensure that operations with armed security arrangements comply with our internal governance framework. Group Security also works closely with human rights specialists within our CSP Area of Expertise (CSP AoE) to help implement our broader human rights approach.

The COVID-19 pandemic continued to have a significant impact on in-person delivery of VPSHRrelated training during 2021 due to global travel restrictions, alternative work arrangements and social distancing requirements. Nonetheless, our sites had access to online security and human rights training products through the company portal, as well as support from Group Security as and when required. In addition, we placed greater emphasis on professional conduct and privacy training for security personnel, given they were having greater interaction with other staff who were experiencing additional stress due to the impact of the COVID-19 pandemic.

2. Transparency

We report annually on our human rights performance (including security and human rights implementation) through our online <u>Annual Report</u>, <u>Sustainability Fact Book</u> and <u>Modern Slavery</u> <u>Statement</u>.

In 2021, we published our fifth <u>Modern Slavery Statement</u>, where we outline the policies, standards and processes that contribute to our control framework to respect human rights and help us to prevent against and address any potential involvement in modern slavery. Our most recent <u>Modern Slavery Statement</u> includes information on how we support security providers through VPSHR training to identify and report instances of modern slavery.

Since 2017, we have published our <u>VPSHR Report</u> online at <u>riotinto.com</u> and made it publicly available through the <u>Voluntary Principles Initiative (VPI)</u>. We are committed to ensuring governments as well as communities, our business partners and investors understand our approach to respecting human rights through our security arrangements. To that end, we have committed to publish a full VPSHR report annually.

In 2021, we continued to strengthen how we manage human rights-related workstreams across functions within our organisation. This involved our security advisors working more closely with functions such as the CSP AoE, <u>Ethics & Compliance</u>, <u>Procurement</u> and <u>Marine</u> to help identify, manage and assure risks associated with security and human rights.

3. Engagement in the VPI

In 2021, we participated in the following VPSHR activities, meetings and working groups:

- Online VPI meetings
- Online Canadian Government Working Groups on the VPSHR meetings
- Online VPI Corporate Pillar meetings

We are committed to providing timely responses to reasonable requests for information from other VPI participants in order to facilitate greater understanding of issues related to the implementation of the VPSHR.

³ Formerly called the "Weapons and Firearms Decision Review". Security and human rights reviews are agreed second-line assurance activities. These reviews focus on the conformance of an asset/operation security function to the Rio Tinto internal governance framework.

Examples of promoting awareness of the VPSHR throughout the organisation, including across the value chain

In 2021, we continued to promote awareness of the VPSHR throughout the business by:

- Raising awareness of and implementing our security and human rights governance framework, through which we implement the VPSHR. We do this by supporting sites to implement the following standards and procedures:
 - Security standard;

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- Security risk analysis and management Group procedure (inclusive of security and human rights risks and mitigating controls);
- Security and human rights Group procedure; and
- Security and safety weapons and firearms Group procedure.
- Maintaining remote/virtual contact and engagement with high-risk sites on security and human rights issues as the COVID-19 pandemic persisted.
- Providing continuous support to high-risk sites in relation to the analysis and management of security risks (including security and human rights risks).
- Developing and delivering online VPSHR training for business leaders, site security champions, private security personnel, CSP personnel and joint venture partners operating in higher risk jurisdictions.
- Providing guidance to sites and Business Resilience Teams on conflict prevention and effective management of security and human rights risks.
- Engaging with product groups and functions to help them prevent and mitigate security and human rights risks.
- Supporting sites with due diligence checks, contracting and training of private security providers.
- Training our internal security auditors to assess site compliance with the Rio Tinto security standard (including the security and human rights requirements).

5. Examples of promoting and advancing implementation of the VPSHR internationally

In 2021, we continued to promote and advance implementation of the VPSHR internationally by:

- Participating virtually in the 2021 Annual UN Business and Human Rights Forum and the 2021 Australian Dialogue on Business and Human Rights which both discussed how to respect human rights in times of crisis.
- Meeting regularly and sharing VPSHR tools and training with some of our joint venture partners, in particular our joint ventures in Brazil and Colombia.
- Participating in the Mining Security Working Group of Canada, which is a forum for subject matter experts and security practitioners within the extractive industry to collaborate and share insights and learnings of ongoing challenges and further the goals of industry initiatives such as the VPSHR.
- Participating in informal meetings with extractive industry peers considering membership of the VPSHR, advocating the benefits of membership and sharing an overview of our approach to implementation.

Engaging with a partner in South America

In 2021, we had the opportunity to share our knowledge and resources about managing security and human rights in our industry with one of our joint venture partners in South America. We shared our VPSHR tools and training materials and supported them in applying to join the VPI. They were able to draw from the lessons we have learned to develop and implement their own global programme, and their application is now in the process of being approved.

A more detailed case study of this engagement was shared on our Intranet in February 2022 in order to build our people's knowledge about the work we are doing to promote and advance the implementation of the VPSHR.

6. Policies, procedures and related activities

In addition to our <u>human rights policy</u> and <u>The Way We Work</u>, implementation of the VPSHR is also supported by the following:

- Security standard: Outlines the Group-wide requirements to protect our people, assets, nondigital information and reputation in line with the VPSHR and to respect the rights of those affected by our security arrangements.
- Security and safety weapons and firearms Group procedure: Specifies the site requirements for authorisation, management, strict control and mitigation of the risks of the presence and use of weapons and firearms for security and/or safety purposes.
- Security and human rights Group procedure: Ensures that our business security practices and arrangements respect human rights, with special emphasis on:
 - Implementing the VPSHR (including risk analysis and engagement with public and private security providers).
 - Working with external stakeholders, including public and private security providers, to promote understanding and implementation of the VPSHR.
 - o Imposing controls to manage the deployment of security weapons, firearms and K9 security.
 - Proactively identifying and managing business practices and decisions that may result in conflict with stakeholders, therefore seeking to eliminate the need for armed security intervention and potential for force abuse.
- <u>CSP standard</u>: In addition to more general human rights provisions, requires all sites to ensure that site Security and CSP functions collaborate to implement the VPSHR as they relate to local communities, relevant to local and operational contexts. A CSP guidance note on social risk analysis also makes it clear that security and human rights risks should be included as part of CSP risk analysis.
- <u>Supplier code of conduct</u>: Sets expectations of our suppliers (including our security providers) to uphold fundamental human rights including promoting humane treatment and preventing harassment and unfair discrimination.
- Know your third party procedure: Sets out a standardised integrity due diligence process to identify the potential legal, ethical or reputational risks of engaging or renewing a supplier, including around security and human rights, with particular requirements around due diligence on all private security providers providing services to Rio Tinto.
- Security and human rights toolkit: Contains guidelines on the use of force and engagement with public security forces, template training plans, security and human rights clauses for agreements with security providers and checklists on private and public security weapon and firearm controls.
- Joint venture participation policy: Highlights that we strive to ensure our joint venture partners and the non-controlled companies in which we participate respect our commitments to uphold human rights.
- Joint venture standard and procedure: Provides the guidelines and minimum expectations for how we will participate in each of our joint ventures so that they can be managed in accordance with our core values and commitments and can work towards alignment with our relevant standards. Managed operations are required to comply with our policies, standards and procedures including the <u>human rights policy</u>. Non-managed operations are expected to be assessed for consistency between their proposed or current governance material and key principles of certain Rio Tinto policies, standards and procedures including the human rights policy.
- Health, Safety, Environment & Security (HSES) incident management Group procedure: Sets out the process to investigate and manage work-related injuries and illnesses, including security incidents.
- Statement on the <u>role of civil society organisations</u>: Recognises the valuable role that civil society organisations can play in supporting and advocating for responsible business conduct and states our support for the existence of an open civic space.

7. Efforts to increase employee awareness and implementation of the VPSHR

Group Security continues to use a combination of engagement tools to drive Group-wide implementation of the VPSHR. These include site visits, coaching, internal audits, VPSHR training delivery and the use of a VPSHR train-the-trainer approach.

Our security training guidance notes provide sites with clear direction on when and how to train colleagues, including business leaders, on security and human rights (see Section 13 for details on training).

In 2021, we hosted a number of internal awareness-raising activities focused on security and human rights. During these sessions Group Security explained the business' commitment to the VPSHR amongst other core international business and human rights standards.

8. Risk assessment

The Rio Tinto security standard mandates all sites to conduct an annual site security risk assessment to identify risks linked to abuse of force, weapons, firearms and other potential human rights abuse related to security. A standardised tool has been developed to guide site security risk assessments. Group Security provides regular training on how to facilitate risk assessments and reviews outputs from these assessments. Where inconsistencies or gaps are identified, sites are engaged to ensure a clear understanding of the risk and controls required.

The methodology used for this assessment involves the collection and review of relevant information and engaging with multi-disciplinary representatives (such as CSP, Human Resources, HSES, Security, Operations and Procurement) to help analyse security risks, as well as identify and analyse the potential for violence, conflict and security and related human rights abuses. Sites are obliged to implement controls to manage identified risks effectively. Group Security also uses the output from the security risk analyses to:

- Identify sites at high and critical risk of security and human rights abuses.
- Monitor and support sites with control implementation (as required).
- Direct effort and prioritise support.

Where a site is considered to have a high or critical inherent security and human rights risk (such as where armed security or public security forces are used), a site visit is conducted by Group Security to identify and assess potential security and human rights issues and to recommend adequate controls to manage these risks. Gaining a greater understanding of the security and human rights situation at a particular site is achieved through a range of actions from examining the preparedness of security personnel to respond to security and human rights incidents, through to interviews with key external stakeholders, such as local government officials, local police, military commanders, our private security suppliers and local community leaders. These interviews occur in consultation with local and Group Security and CSP functions (amongst others), to encourage both local ownership and alignment with Group-level standards. Group Security monitors and supports sites with the implementation of risk control frameworks recommended during these visits.

Unfortunately, the COVID-19 pandemic continued to have a significant impact on in-person site visits in 2021 due to global travel restrictions. Group Security has, however, maintained contact with high-risk sites through regular virtual meetings and some limited on-the-ground assessments and engagements, focusing on providing advice and implementation support (see Section 10 for details).

9. Engagements with security forces

Security and human rights incidents can be reported in three ways:

• Through our Health, Safety, Environment, Security and Communities incident reporting system - this system provides a specific classification for security and human rights incidents. Our Group procedure on Health, Safety, Environment and Communities (HSEC) incident management provides direction and guidance to sites and Group Security on dealing with security incident reporting and investigation (including allegations or incidents involving security and human rights abuses).

- Through myVoice myVoice is our confidential reporting programme, which is available to our people, suppliers (and their employees), community members, other stakeholders and the public to bring allegations of issues and inappropriate behaviour to the attention of senior management. Subject to local law, reports to myVoice can relate to any topic including concerns about material violations of laws or company standards, policies or procedures this includes issues around human rights and security. More information on myVoice is available on our designated myVoice website and on our broader Ethics and Compliance webpage.
- Through site community complaints, disputes and grievance mechanisms these mechanisms are required under our CSP standard and must be operated in line with the UNGPs' criteria for effective non-judicial grievance mechanisms. This includes being publicly available, locally appropriate and easily accessible to all community members affected by Group operations and businesses. Complaints must be addressed and the actions to resolve the matter recorded and reported. 2021 targets require all sites to capture and manage community complaints effectively and reduce the number of repeat and significant complaints each year. In 2021, 95% (20 out of 21 asset groupings) met their 2021 repeat complaints target. You can read more in our <u>Sustainability Fact Book</u>.

Reviewing our grievance mechanisms

In 2021, we reviewed – via internal audit and external review – our site-level complaints, disputes and grievance mechanisms, including the extent to which they meet the UNGPs' criteria for effective non-judicial grievance mechanisms. The reviews found opportunities for improvement, including better governance and increased community engagement and dialogue to help meet the needs of communities, and especially vulnerable groups. Follow-up actions include clarifying site-level roles and responsibilities, developing clearer guidance and training on design and implementation and improved reporting.

We hope that working to evolve these critical local processes will help provide communities with more transparent, accessible and legitimate channels to have their complaints heard and resolved, improve the way we work, and ultimately, help contribute to more trusting relationships between our company and the communities where we operate.

In 2021, we continued to monitor the effectiveness of our control framework to help prevent our involvement in adverse human rights impacts and, importantly, our mechanisms to provide for, or cooperate in, remediation if we identify that we have caused or contributed to human rights harm.

Our security and human rights Group procedure requires our sites to report, record and investigate any incidents involving actual or alleged security and human rights abuses in accordance with the HSES incident management Group procedure. This includes violations of international humanitarian law, as well as any other human rights harms resulting from the use of security weapons, firearms or K9 security including through intentional or accidental discharge, pointing, injury, damage, allegations of unsafe or unauthorised use, force, abuse or legal inquiry.

Our business leaders, Group Security and Group Ethics and Compliance functions as well as other functions as needed are committed to fully supporting and cooperating with any resulting inquiry or investigation, and we expect our security providers (private or public) to work to meet this standard. This includes implementing the measures necessary to limit, reduce, prevent, deter reoccurrence of or remediate a security and human rights allegation or incident.

Direction on the identification, reporting and investigation of potential breaches of <u>The Way We Work</u>, our policies, procedures or laws by any Rio Tinto employee, contractor, security supplier or business

partner is provided in our Business Conduct Office's myVoice procedure and investigations manual. This includes wrongdoing that adversely impacts human rights.

Group Security is working with product groups and functions to improve our security and human rights incident reporting system and escalation and investigation processes. We know we have room to evolve when it comes to ensuring that escalation to Group Security is consistent and includes all relevant information.

10. Overview of country operations selected for reporting

The ongoing COVID-19 pandemic has had a significant impact on in-person delivery of VPSHRrelated training due to global travel restrictions, alternative work arrangements and social distancing requirements. Nonetheless, our sites had access to online security and human rights training products through the company portal. In addition, all sites have access to subject matter experts to support VPSHR implementation.

In 2021, Group Security was able to enhance or support the implementation of the VPSHR at the following sites:

- Richards Bay Minerals South Africa: A second line assurance activity in the form of a security and human rights review was conducted by Group Security where improvement opportunities were identified for site implementation.
- **Oyu Tolgoi Mongolia:** A second line assurance activity in the form of a security and human rights review was conducted by group security where improvement opportunities were identified for site implementation.
- Mt-Rosser Jamaica: Re-evaluation of the risk context after significant improvements were
 made to physical security measures and work methods, which resulted in a reduction of armed
 guards at the site.
- **Rio Tinto Marine:** Group Security has worked with Rio Tinto Marine on how best to engage with chartering parties on the use of armed private maritime security contractors for high-risk voyages. As a result of this work, voyage and time charter vessels have an explicit approvals process (which embodies the VPSHR) for the use of armed private maritime security contractors for high-risk voyages.

11. Engagements with stakeholders on country implementation

See sections 4, 5 and 10 for details.

12. VPSHR considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as arrangement with public security forces

Our procurement process for contracting security suppliers includes a due diligence analysis of the human rights performance of all private security providers, as mandated by our know your third party procedure. In addition to the know your third party procedure, our security supplier management guidance notes expand on our procurement and supplier management requirements and give further guidance to sites on engaging with suppliers providing security-related services. Specifically, our sites are required to conduct pre-qualification checks on potential security suppliers, including:

- Criminal background checks, where possible.
- Considering whether the potential security supplier has:
 - A management system that contains security procedures, a drug and alcohol policy and a code of conduct.
 - An employee selection procedure that includes pre-employment medical screening, assessment of fitness for work evaluation, and confirmation of employee competencies and qualifications.
 - A formal process for reporting and investigating incidents.

- Security-related technical capabilities and competencies (including training).
- Adequate control measures to manage weapons and/or firearms used for security purposes (if applicable).
- Legal and/or regulatory compliance to provide professional or security-related services (such as security provider registration and weapon and firearm licensing).

Our sites must also ensure that all contractual agreements with security suppliers include clearly defined roles and responsibilities for both Rio Tinto and the supplier, as well as the competencies and training required. Contractual agreements with suppliers providing guarding services must also include a signed security and human rights addendum (developed in line with the VPSHR and in use since December 2015) to be respected by the security provider, with specific focus on security and human rights training requirements, technical skills and proficiency, ethics and conduct, as well as controls for the use of force, weapons and firearms by private security personnel. In addition, we expect all security suppliers to comply with our supplier code of conduct, which requires respect for human rights. Our standard global supply contract and purchase order terms and conditions, as well as our Marine chartering contracts, include modern slavery provisions.

Group Security continues to support sites (as required) with the selection and contracting of private security providers with guidance notes on engaging public security forces and ad hoc or emergency public security forces support, which provide clear guidelines to sites on how to engage and work with public security forces.

Sites intending to establish a formal agreement or a memorandum of understanding (MoU) with public security forces, or that wish to provide any type of support to public security forces, are required to secure the approval of both our Chief Advisor Group Security and the relevant product group or function Chief Executive. For this purpose, sites are required to collect all relevant information and assess the risk of using public security, as well as the risk of providing logistical or financial support to these agencies.

If approved, sites will continue to work with our legal counsel and the relevant government agency to develop a formal written agreement or MoU that details security and human rights considerations, Rio Tinto business expectations and the logistical or financial support that will be provided. In line with the VPSHR, our sites will then take the necessary steps to ensure that any support, equipment loan/transfer or funding to public security forces, including support arranged or delivered through third parties:

- Does not contravene any recognised laws, regulations or standards.
- Is limited to accommodation, office, warehouse or storage-like facilities, basic living necessities, safety aids, transportation, non-lethal equipment and logistical support and non- military/tactical police training.
- Is limited to instances where federal, state or local governments with jurisdictional oversight have demonstrated that they do not have the expertise, resources or funding needed to construct, maintain or repair facilities without support.
- Excludes the building of prisons.
- Excludes weapons, firearms or ammunition.
- Avoids providing equipment that requires end-user certificates (such as secure communication sets, bullet or stab-resistant jackets, helmets, visors, etc) without clear guidance from home government export licensing departments.
- Is recorded and reported to Group Security.

Sites also keep detailed records of all engagements, agreements, transactions and support to public security forces. The deployment of transferred equipment and the use of facilities constructed or refurbished as part of support to public security forces is also monitored.

We have two MoUs with public security forces under discussion in two African countries – one MoU is in the process of being renewed and the other is a new MoU.

As set out in the Rio Tinto security standard and security and safety weapons and firearms

procedure, the use of firearms (from private and public security) in support of Rio Tinto security must be explicitly approved by both our Chief Advisor Group Security and the relevant product group or function Chief Executive. Use of weapons, other than firearms, must also be explicitly approved by the site's most senior leader and Chief Advisor Group Security.

Strict pre-conditions and controls must exist before Group Security approves the use of weapons or firearms (through private and public security agreements). These pre-conditions include the presence of security risks that pose a direct threat to the life of our employees, contractors and/or security personnel in support of sites/projects and ensuring that conflict prevention strategies are in place (such as community and employee engagement).

Our controls work to ensure that the use of firearms must be the last resort to protect people when all other possible security countermeasures have been implemented. Furthermore, these controls must be in line with the VPSHR and other relevant commitments.

Group Security is accountable, through a rigorous on-site assessment process, for advising on the need to use firearms and to request explicit approvals if the use of public security and/or firearms is justified in a given context. This process requires that Group Security returns on site every two years to re-assess and report on the need to use (or not) firearms in the site security arrangements. This assurance process is currently undergoing a review as part of a Group-wide initiative to strengthen our internal assurance processes.

13. Examples of supporting outreach, education and/or training of (i) relevant personnel, (ii) private security, (iii) public security and/or (iv) civil society (such as local NGOs, community groups)

We communicate our <u>human rights policy</u> internally and externally. Our introductory Group-wide human rights online training includes information on our security and human rights commitment.

We also have a range of security and human rights training products for different target audiences, including:

- In-person VPSHR course (two days) for security personnel delivered by Group Security or competent trainers (available in English, French, Bahasa and Mongolian) compulsory for sites with armed security and strongly recommended for high- and critical-risk sites.
- In-person VPSHR Train-the-Trainers course delivered by Group Security (two days) for sites (available in French and English) – to build local VPSHR training capacity. The course provides knowledge and skills to effectively facilitate the delivery of the two-day in-person course referred to above.
- Multimedia VPSHR training package (one hour) for security personnel (to be available in 2022 in English, French, Spanish and Serbian) mandatory for all private security personnel, including guards and managers and available to public security forces. The updated training package was released in 2021 with significant enhancements for modular delivery. Security subject matter experts at sites with large numbers of security personnel and higher security and human rights risks were consulted as part of the development of the training, which has enabled us to ensure the training is culturally appropriate. The training is available through the Rio Tinto Learning Management System, which allows enables centralised tracking of completion rates. The training is also available through a separate platform, as it is recognised that not all security personnel will have access to the Rio Tinto platform.
- Web-based security and human rights training animation available to all of our people (six minutes) to promote awareness of the VPSHR (available in English and French).

We have also developed a security workbook, which will give us better visibility of the number of security personnel trained at sites and the security profile of our sites. In 2021, through the security workbook, sites reported that a total of 1,101 security personnel were trained.

14. Company procedure to review progress on implementing the VPSHR at sites

Our processes and activities used to monitor security and human rights implementation at sites include:

- Our security risk analysis and management approach which includes an assessment of the effectiveness of controls.
- Group Security conducts visits to high-risk sites in order to review and optimise local VPSHR implementation and assess the effectiveness of controls.
- Our security and human rights review process includes a systemic review of security and human rights controls for all sites utilising armed security or public security forces.
- Group Security participates in Business Conformance Audits at all sites every two years. During
 these audits, compliance with the Rio Tinto security standard, which includes aspects of VPSHR
 compliance and implementation, is audited at site level using a risk-based approach. Business
 Conformance Audits may also consider security and human rights issues as part of assessment
 against the CSP standard.
- Regular dialogue between Group Security and other key functions including Procurement, CSP, Projects and Exploration functions helps to identify Group-wide and local issues in implementing the VPSHR.
- Our human rights performance is assessed through various external initiatives. For example, the ICMM has a performance expectation that focuses on implementing, based on risk, a human rights and security approach consistent with the VPSHR. In 2021, one site only partially met this performance expectation while VPSHR training was conducted at the site, gaps were identified in relation to the site's security plan and due diligence checks. The identified gaps have been addressed. Further, the Aluminium Stewardship Initiative has a criterion focused on ensuring an entity respects human rights in line with recognised standards and good practices in its involvement with public and private security providers no non-conformances were identified with this criterion in 2021. Additionally, Copper Mark has a criterion focused implementing the VPSHR when engaging private or public security forces no non-conformances were identified with this criterion in 2021.

15. Lessons and opportunities to advance the VPSHR

In 2021, Group Security efforts to further strengthen our security and human rights governance framework and implementation of the VPSHR included:

- Continuing to develop the capacity of our sites to implement the Rio Tinto security standard and supporting procedures.
- Reviewing security weapon approvals and controls for our business operations globally.
- Reviewing existing online training materials to ensure they are fit-for-purpose for a wide audience.
- Supporting the Group-wide initiative to strengthen our internal assurance processes by ensuring that aspects of security and human rights are effectively covered.

As the COVID-19 pandemic is still having significant impacts globally, our Group Security function will continue to work closely with our Health, Human Resources and CSP functions to ensure that our ongoing directives and responses to COVID-19 consider the wellbeing of the communities and people where we operate. As we continue to manage COVID-19 related challenges, we remain committed to take the steps necessary to implement the VPSHR and ensure our security arrangements respect human rights.