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SAFETY, HEALTH AND ENVIRONMENT (SHE) WAY



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ABBREVIATIONS

CMS	Contractor Management System
C&BP	Contractor and Business Partner
ISO	International Standards Organisation
JRA	Job Risk Analysis
KPI	Key Performance Indicator
LFI	Learning From Incidents
LoM	Life of Mine
MSDS	Material Safety Data Sheets
OM	Operating Model
ORM	Operational Risk Management
PTO	Planned Task Observation
SHE	Safety – Health – Environment
SLAM	Stop – Look – Assess – Manage
SMART	Specific, Measurable, Achievable, Relevant and Time-bound
SOP	Standard Operating Procedure
VFL	Visible Felt Leadership

SECTION 1: INTRODUCTION

Anglo American PLC owns and operates a wide range of businesses which, by virtue of their size, diversity of operations and geographical locations, pose significant safety, health and environmental (SHE) challenges.

The overall conduct of Anglo American businesses, and the values and behaviours which guide our Group, are set out in our Code of Conduct and detailed below.



Safety

This is always first on our agenda – and for a very good reason. We truly believe that ALL injuries are preventable and that by working together we can make safety a way of life.

- We put safety first in everything we do.
- We make safety a way of life inside and outside the workplace.
- We show genuine concern and take responsibility for our own safety and that of others.
- We truly believe that ALL injuries are preventable.
- We continually re-assess risks and comply with rules and procedures.



Care and respect

We always treat people with respect, dignity and common courtesy – regardless of their background, lifestyle or position. And we are building trust through open, two-way communication every single day.

- We always treat people with respect, dignity and common courtesy regardless of background, lifestyle or position.
- We are fair, compassionate and empathetic with others and respect ourselves.
- We build trust through open, two-way communication and appreciate different points of view.
- We consider the impact of our actions on others.
- We take into account the best interests of all stakeholders.



Integrity

This means taking an honest, fair, ethical and transparent approach in everything we do. It's not about being popular; it's about always doing the right thing.

- We are honest, fair, ethical and transparent.
- We are willing to do the right thing, even if it means running the risk of being unpopular.
- We 'walk the talk' – our actions are consistent with our words.
- We deal with people and issues directly and avoid hidden agendas.
- We speak up when something is not right.



Accountability

We take ownership of our decisions, our actions and our results. We deliver on our promises and acknowledge our mistakes. Above all, we never pass blame.

- We take ownership of our decisions, actions and results rather than blame others.
- We deliver on our promises and own our outcomes – both good and bad.
- We have a 'can do' attitude, high-performance expectations and a bias for action.
- We openly acknowledge and learn from our mistakes.
- We go beyond the responsibilities of our role to benefit Anglo American (above and beyond the call of duty).
- We hold others accountable.



Collaboration

No one here is on their own. We are one Anglo American with a joint ambition – all working together to make decisions and get things done more effectively.

- We make decisions based on what is good for Anglo American, not our own self-interest.
- We work together to get things done across the whole organisation.
- We communicate expectations and provide people with the information they need to do their jobs effectively.
- We appreciate the efforts and contributions of others.
- We are one Anglo American, we act inclusively across all groups and we are united against the competition ('us' versus 'them').



Innovation

Challenging the way things have always been done is a key priority for us. By actively developing new solutions, encouraging new ways of thinking and finding new ways of working, we are significantly improving business.

- We challenge the way it has always been done (the status quo).
- We are visibly open to learning new approaches and to encouraging new ways of thinking.
- We find new ways to dramatically improve business and to use resources more efficiently and effectively.
- We seek to apply learning from our own experience and that of others.
- We actively develop future-oriented solutions.

SECTION 1: INTRODUCTION

Anglo American aims to deliver all work in line with our vision of Zero Harm. This requires addressing the SHE-related risks and opportunities derived from our activities and the context in which we operate whilst ensuring that we systematically meet our compliance obligations.

The SHE Way is a management system framework that describes our systematic approach to the management of SHE-related risks and opportunities and how this integrates with our business processes.



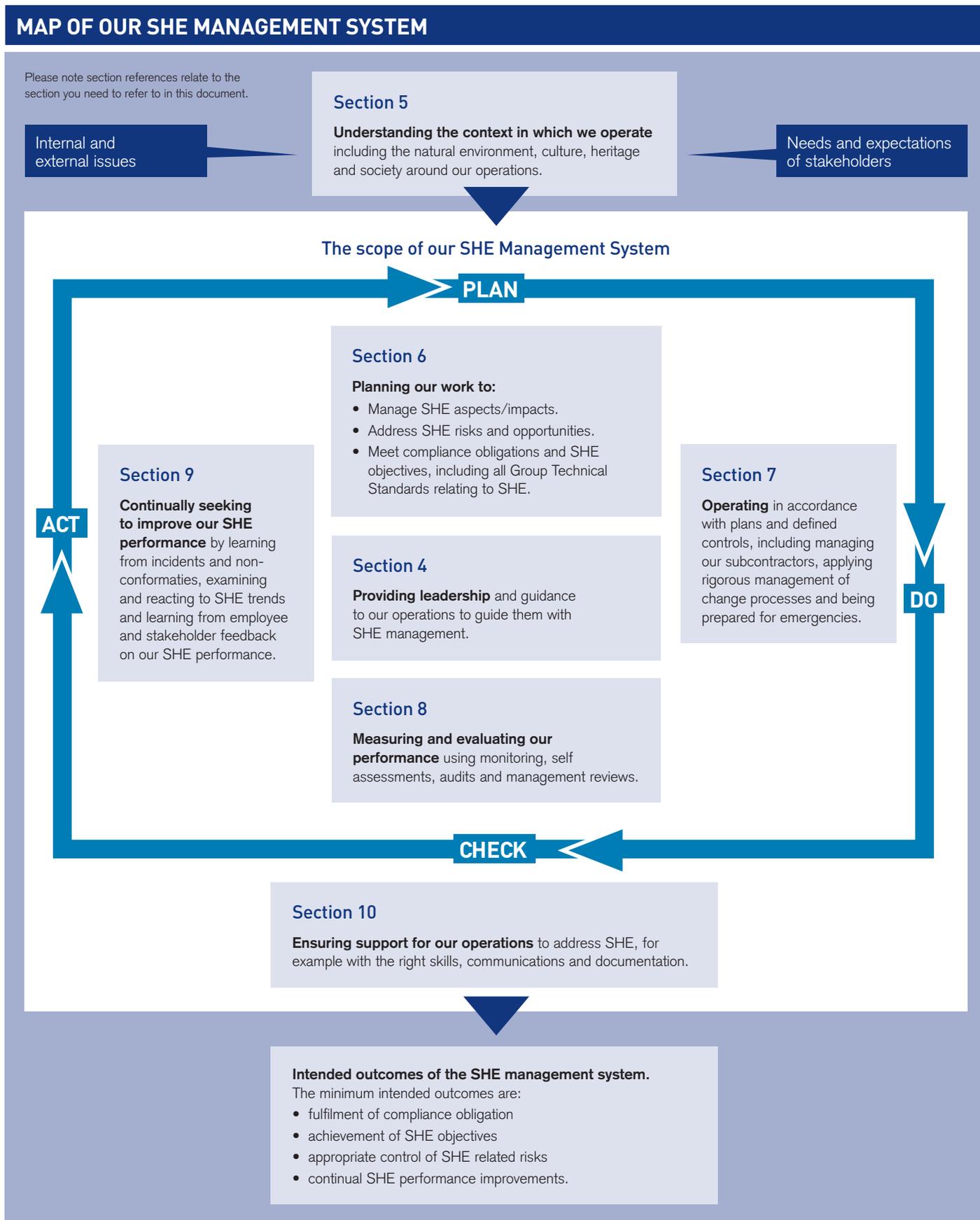
A 'management system' is a continual and cyclical process for supporting performance improvement. Specifically, the SHE Way supports:

- continuous performance improvement in SHE through the proactive management of SHE in our work, and measurement and evaluation of our performance to identify improvement opportunities;
- achievement of our SHE vision and objectives; and
- consistency and efficiency in our approach to SHE management across the Group.

In addition, it provides a framework to ensure we plan and schedule our activities in accordance with our policies and standards, and in alignment with the Anglo American Operating Model (OM). The SHE Way conforms to the principle of Plan – Do – Check – Act and is auditable. It is composed of the following seven complementary elements that present the framework through which we manage our SHE performance:

- **Leadership:** our leaders play an integral role to deliver the SHE Way.
- **Context of the organisation:** our SHE management system must be appropriate for the context in which we operate.
- **Planning:** work must be planned to deliver on our SHE vision and objectives.
- **Operation:** work is executed by our employees and contractors to manage our SHE-related risks and opportunities.
- **Performance evaluation:** our SHE performance is measured and reviewed to identify opportunities for improvement.
- **Improvement:** we proactively understand and address gaps identified in our SHE performance and processes.
- **Support:** the right skills, communications and documents are in place to enable our SHE management system.

SECTION 1: INTRODUCTION



Our Chief Executive Officer is committed to the SHE Way and the Anglo American Executive Committee has endorsed its implementation. The Anglo American Board of Directors seeks assurance of compliance to the SHE Way through regular self-assessments, peer reviews and third party audits.

SECTION 2: VISION, PRINCIPLES AND POLICY

SHE core purpose and expected behavior to achieve our Zero Harm ultimate goal, are outlined in our vision, principles and policy statement.

VISION

Recognising that it is unnecessary for individuals to incur injury or sickness, our vision is to achieve Zero Harm to our workforce including contractors through the effective management of occupational health and safety risks within and around our operations.

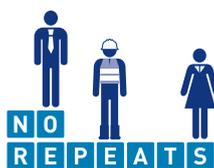
We seek to minimise our impact on the environment by designing, building, operating, rehabilitating and closing all of our operations in an environmentally controlled and responsible manner that minimises pollution and eliminates where possible or prevents irreversible environmental impacts.



PRINCIPLES



We shall apply the hierarchy of eliminating, avoiding, minimising, mitigating, remediating/ rehabilitating and offsetting the SHE impacts and risks arising from our activities, products and services where possible.



All necessary steps will be taken to learn from SHE incidents, audit findings and other non-conformances to prevent their recurrence.



Common non-negotiable Group and SHE management, performance standards and procedures, shall be applied throughout the Group as a minimum requirement.

POLICY

- ✓ We hold our leaders accountable for the safety and health of our people and for environmental stewardship and expect all our line managers and supervisors to provide effective SHE leadership.
- ✓ We recognise that positive SHE behaviour consistent with Zero Harm is the responsibility of all those who work for us, as is contributing to maintaining a working environment where risks are effectively controlled and monitored to ensure the health and safety of people or the environment.
- ✓ Managers of every business or operation are responsible for the full implementation of the Group Technical Standards and the SHE Way and their related procedures, guidelines and specifications. This requires the provision of appropriate resources, systems, training, education, consultation and auditing for SHE management to protect, maintain and promote the health, safety and working capacity of our workforce as well as ensure minimum harm to the environment that we operate in.
- ✓ Every business or operation must ensure that they determine and fulfill all of the requirements relating to their SHE compliance obligations which include all applicable SHE legal requirements and any other SHE requirements that we must or choose to comply with.
- ✓ We commit to open communication with our employees and with all our stakeholders to encourage a culture that drives SHE performance based on continuous improvement.
- ✓ We will set appropriate objectives and monitor progress against our SHE policy to ensure continuous improvement towards our vision of Zero Harm.
- ✓ We expect our consultants, agents, contractors and suppliers to follow our policies and requirements relating to SHE management and practices.
- ✓ We respect people's culture and heritage in our approach to SHE management.

SECTION 3: SHE GOVERNANCE FRAMEWORK

The SHE Governance Framework defines the roles and responsibilities of the corporate centre and business units on the journey towards Zero Harm:

- The corporate centre defines, communicates and reviews requirements in relation to the vision, leadership, principles, policy and standards for SHE management.
- The business units implement and build the corporate requirements into business-specific programmes.

CORPORATE

The corporate centre will define and communicate what is required, including clear, non-negotiable standards for the Group. This will require, inter alia, resourcing, communication, setting of Group KPIs and an overarching plan.

Leadership	Anglo American Plc.	Audits
<ul style="list-style-type: none"> • Anglo American Vision, Code of Conduct and Policy • Policy, Standards and Guidelines • Sustainability Strategy 	<ul style="list-style-type: none"> • Executive Board • Sustainability Committee* • Corporate Safety and Sustainable Development 	<ul style="list-style-type: none"> • Peer Review • Third-party

BUSINESS UNITS

The business units will implement the Anglo American corporate policy and add their own business-specific standards and rules to these. This will require resourcing, communication, setting of business-specific KPIs and operational plans.

Leadership	Operations	Audits			
<ul style="list-style-type: none"> • Anglo American Vision, Code of Conduct and Policy • Corporate and Business Unit Policy and Guidelines 	<ul style="list-style-type: none"> • Including contractors <table border="1"> <tr> <td>Procedures</td> </tr> <tr> <td>Training</td> </tr> <tr> <td>Behaviour</td> </tr> </table>	Procedures	Training	Behaviour	<ul style="list-style-type: none"> • Internal • Self-assessment • Third-party • Behavioural
Procedures					
Training					
Behaviour					

*The role of the Anglo American Board of directors is to promote the long term success of the business for its shareholders. The Board delegates certain responsibilities to a number of standing committees – the Sustainability, Remuneration, Nomination and Audit committees.

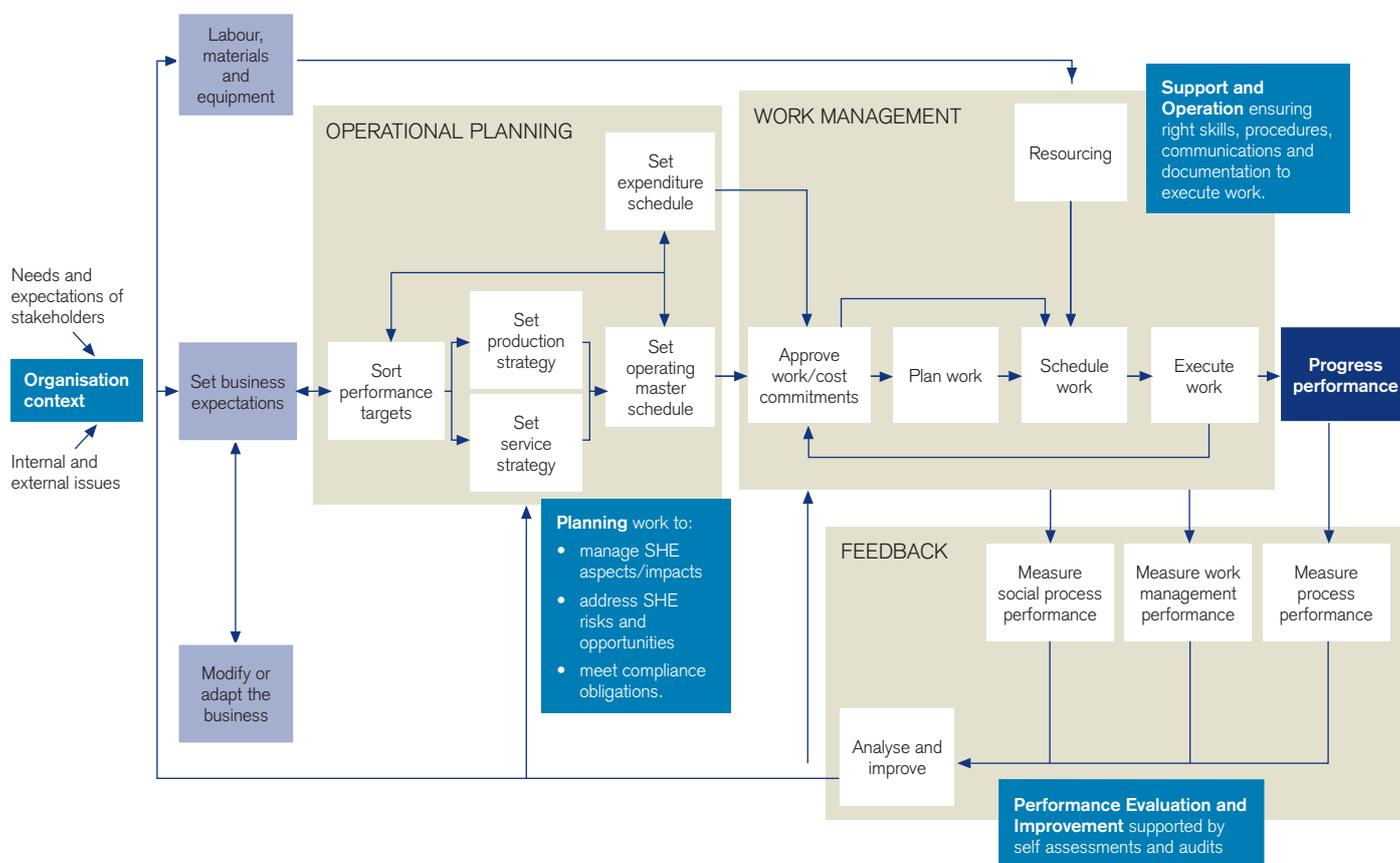
The Sustainability Committee holds accountability for determining and overseeing how Anglo American manages its most material sustainability issues. The Board delegates executive responsibilities to the General Management Committee (GMC), which is made up of the Chief Executive, business unit CEOs and Group directors. The GMC is supported by corporate (CorpCo), operational (OpCo) and investment sub-committees (InvesCo). OpCo is responsible for reviewing corporate policies and processes as well as the financial performance and budgets for business units. OpCo is responsible for driving operational best practices across the Group and the setting of technical standards. InvesCo makes recommendations to the GMC on capital investment proposals.

SECTION 3: SHE GOVERNANCE FRAMEWORK

Our approach to managing SHE is aligned with our OM (and Investment Development Model), which defines a structured approach for how we set targets, plan, schedule, execute and improve work to achieve our business objectives more efficiently, effectively and sustainably.

OPERATING MODEL ALIGNMENT

SHE Way touch-points into Operating Model



Application

It is mandatory and applies to all activities within Anglo American-managed businesses and operations.

It applies to all operations, including those that might be in a process to be divested or closed. All Anglo American SHE management systems for our managed operations, including contractors, must be aligned with the SHE Way.

The SHE Way will be considered during mergers and acquisitions to assist in the identification of potential SHE-related risks, opportunities and liabilities associated with businesses prior to them becoming part of Anglo American.

The SHE Way will be made available to independently-managed operations, via our representatives on the relevant Boards, and to joint ventures to encourage their application and improvement in SHE management.

Scope

Each business or operation must clarify the scope of their SHE management system in line with the SHE Way.

At a minimum, the scope of the SHE Way covers all operational activities that have the potential to affect our ability to meet our vision of Zero Harm. The SHE Way is applicable to the entire life cycle of operations from exploration and planning through to operation, closure and post-closure activities (decommissioning, remediation and rehabilitation), as well as our Commercial Offices. The SHE impacts of our products and services must be considered and, where appropriate, addressed.

Management Review

The SHE Way will be reviewed at least annually to ensure that it remains current and valid.

SECTION 4: LEADERSHIP

One of the most important contributors to sustained – and improved – SHE performance is leadership and the impact that our leaders make by being available, visible and felt in the workplace. Leaders play a critical role to develop and support an engaged and productive workforce and must ensure that they take on a ‘coaching role’ and integrate accountability reviews for SHE into their management routines.

This section presents the requirements that must be met by our leaders, managers and supervisors to support the SHE management system. Anglo American’s process around Visible Felt Leadership supports our leadership to embed a SHE performance culture throughout our business. It also highlights the requirement to provide clarity on roles, accountability and responsibilities for the SHE management system.

4a. Leadership and commitment

Managers at each Anglo American business or operation are accountable for establishing and maintaining a business or operation specific SHE policy and SHE management system to meet:

- Anglo American’s vision of Zero Harm for health and safety and to minimise harm to the environment;
- the requirements of the SHE Way and the International Standards Organisation (ISO) Safety and Occupational Health as well as Environment Management System Standards (see glossary for detail); and
- their compliance obligations including legal requirements and other agreed SHE-related stakeholder and voluntary requirements.

Managers must ensure that:

- SHE objectives are established and are compatible with Anglo American’s vision, principles, policy and standards;
- adequate resources (human, technical and financial) are made available to support the effective implementation and maintenance of the SHE management system in alignment with the requirements of the SHE Way; and
- the SHE management system achieves its intended outcomes, including fulfillment of compliance obligations, achievement of SHE objectives, appropriate control of SHE-related risks and continual SHE performance improvements.

Managers at each Anglo American business or operation are responsible for driving a Zero Harm SHE culture in the business and must visibly demonstrate their commitment to SHE performance by:

- driving the integration of SHE into business planning and processes and operational management systems;
- actively participating in SHE programmes, audits and reviews to ensure that corporate and site-specific SHE standards are embedded into operations;
- engaging with staff and contractors using planned task observations (PTOs) and visible felt leadership (VFL) techniques and acting as role models in identifying and addressing SHE-related risks and opportunities;

- promoting a culture of learning and improvement by learning from incidents, sharing lessons learnt, and following up on actions and commitments to ensure effective implementation;
- ensuring consistency of SHE activities and outcomes with the Anglo American Social Way requirements; and
- empowering employees and contractors to take ownership for SHE management – especially encouraging them to use their stop work authority when the SHE-related risks tied to the work they perform are not managed consistently with our vision of Zero Harm.

Anglo American staff and contractors must demonstrate a clear understanding of the need to comply with corporate and operation-specific SHE management standards and of the consequences of non-compliance. This will be demonstrated through:

- fulfilling their defined SHE responsibilities;
- conducting their work with an approach that includes preventing and/or correcting harmful behaviours or work conditions; and
- refusing to allow work to be undertaken or continued where conflict exists between the SHE intended outcomes and other business priorities, for example SHE-related risks are not adequately addressed or conflicts exist between operating principles and SHE objectives.

4b. Policy

All Anglo American businesses or operations, including contractors, must comply with Anglo American’s Corporate SHE policy. In addition to Anglo American’s corporate SHE policy, each Anglo American business or operation must adopt a SHE policy that is appropriate to the nature and scale of the activities being managed and maintain this continuously to ensure it remains relevant. The policy must:

- conform with Anglo American’s SHE policy and comply with the operation’s context and all of its compliance obligations at a minimum;
- commit to the proactive identification and management of SHE-related risks to support the achievement of Anglo American’s vision of Zero Harm;

SECTION 4: LEADERSHIP

- provide a framework for setting SHE objectives to drive continuous performance improvement of the SHE management system and SHE outcomes;
- be consistent with other Anglo American Policies and Group Technical Standards where relevant; and
- be endorsed by top management, communicated throughout the business or operation and made available to stakeholders.

4c. Roles, responsibilities and authorities

Each Anglo American business or operation must have clearly defined roles, responsibilities and accountability at all levels and functions within the organisation to ensure the effective implementation of the SHE management system. These will be documented and communicated to relevant employees, as well as the SHE performance expectations against which employee performance will be assessed. This should be consistent with the principles of the People Development Way.

In terms of the SHE management system, managers at each business or operation are accountable for the achievement of

SHE objectives through the SHE management system. They are supported by SHE practitioners who are the technical experts that are responsible for the delivery of the SHE management system to meet compliance obligations and SHE objectives. Employees and contractors at each business or operation are responsible for ensuring they deliver their work in line with the SHE expectations defined in Standard Operating Procedures (SOPs) and relevant Group Technical Standards.

Management must assign responsibility and authority for:

- ensuring that the SHE management system meets its intended outcomes;
- monitoring employee and contractor SHE performance; and
- reporting on the performance of the SHE management system as well as SHE performance to top management.

The appointed person(s) must have a clear understanding of their role, responsibilities and authorities to fulfill their duties and support management. Management retains accountability for the site's SHE management system and the achievement of the SHE intended outcomes.



SECTION 5: CONTEXT OF THE ORGANISATION

There are a range of internal and external issues that can impact, either positively or negatively, on our ability to achieve our vision of Zero Harm. We must identify these issues and determine which ones will need to be specifically addressed and managed as part of our approach to SHE management.

This section contains requirements for our operations to understand the context in which they operate and within which they establish, implement, maintain and continually improve their SHE management system. Operations must use Anglo American's approach to understanding and addressing our social risks and impacts (including human rights) as defined in the Anglo American Social Way and our human rights policy. Anglo American's material sustainability issues should also inform this process.

CONTEXT OF THE ORGANISATION

Understanding the context in which we operate

including the natural environment, culture, heritage and society around our operations.

Internal and external issues

What issues/conditions could influence the SHE outcomes that we are trying to achieve? E.g. cultural, legal, financial, technological and environmental conditions.

Needs and expectations of stakeholders

Who are our stakeholders and what are their needs and expectations in relation to SHE management and outcomes?
(Adopted needs and expectations become compliance obligations)

To determine the scope of our SHE management system and ensure that our plans are defined to address our specific context.

Practical examples

External issue

Operations in water stressed areas with catchment level competition for water resources, the management of water to drive efficiencies will be imperative.

Internal issue

In locations where there are multiple official languages, consideration must be given to the best approach to provide SHE training.

Stakeholder commitments

Where our operations are nearby to communities, commitments to blast at certain periods of the day only (such as dusk or dawn to minimize disruption to school facilities) might be made which could lead to additional SHE risks that must be proactively addressed through the SHE management system.

Each Anglo American business or operation must consider the specific context within which they operate to understand the internal and external issues that can affect the achievement of their SHE objectives and Anglo American's vision of Zero Harm (see glossary for detail). The internal and external issues considered and specifically identified by the business or operation in relation to their operating context should be identified within the documented information in the SHE management system and updated annually as part of the management review process.

The business or operation must be able to demonstrate how the organisation's context has shaped its SHE management system, including the identification and assessment of SHE-related risks and opportunities taking into account conditions that a business or operation affects, and those that can affect the business or operation.

Each Anglo American business or operation must have a process to determine the specific stakeholder SHE-related

needs and expectations it adopts as a compliance obligation (see glossary for detail). The process should be aligned and ideally integrated with the business or operation's Stakeholder Engagement Plan and the Social Commitment Register (see requirements in the Anglo American Social Way) and build on the operation's understanding of the context in which they operate. Through the process, the business or operation must identify:

- the stakeholders that are relevant to its SHE management system;
- the relevant needs and expectations of these stakeholders in relation to SHE;
- which of these stakeholder SHE-related needs and expectations it chooses to adopt as compliance obligations – this process is voluntary and should be informed by the defined SHE objectives and defined scope of the SHE management system.

SECTION 5: CONTEXT OF THE ORGANISATION

Compliance obligations stemming from stakeholder SHE-related needs and expectations must be recorded in the SHE compliance obligations register (see Section 6c).

Each Anglo American business or operation must document the scope of its SHE management system based on consideration of its context, its compliance obligations, its organisational/ functional and physical boundaries, its business partners, its activities as well as its products and services and its authority and ability to exercise control and influence over these.

At a minimum, the following scope must be covered by the SHE management system:

- all operational activities that have the potential to affect our ability to meet our vision of Zero Harm;
- the entire life cycle of operations from exploration and planning through to operation, closure and post-closure activities (decommissioning, remediation and rehabilitation); and
- the SHE impacts of our products and services must be considered and where appropriate, including in all cases where Anglo American has control and influence over SHE outcomes, addressed.

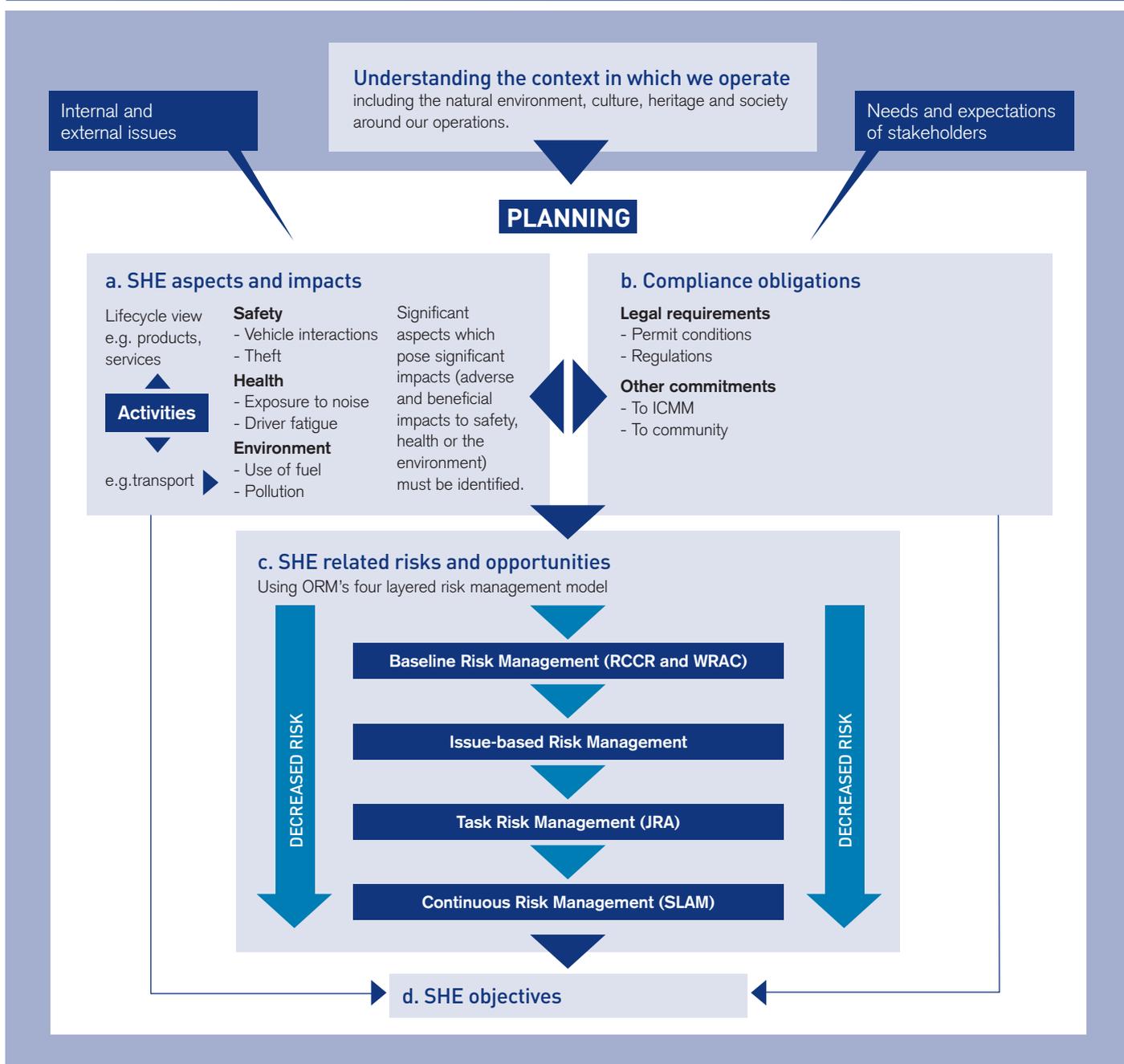


SECTION 6: PLANNING

Anglo American's OM is underpinned by the philosophy that 'doing the right work at the right time and in the right way will deliver the required performance'.

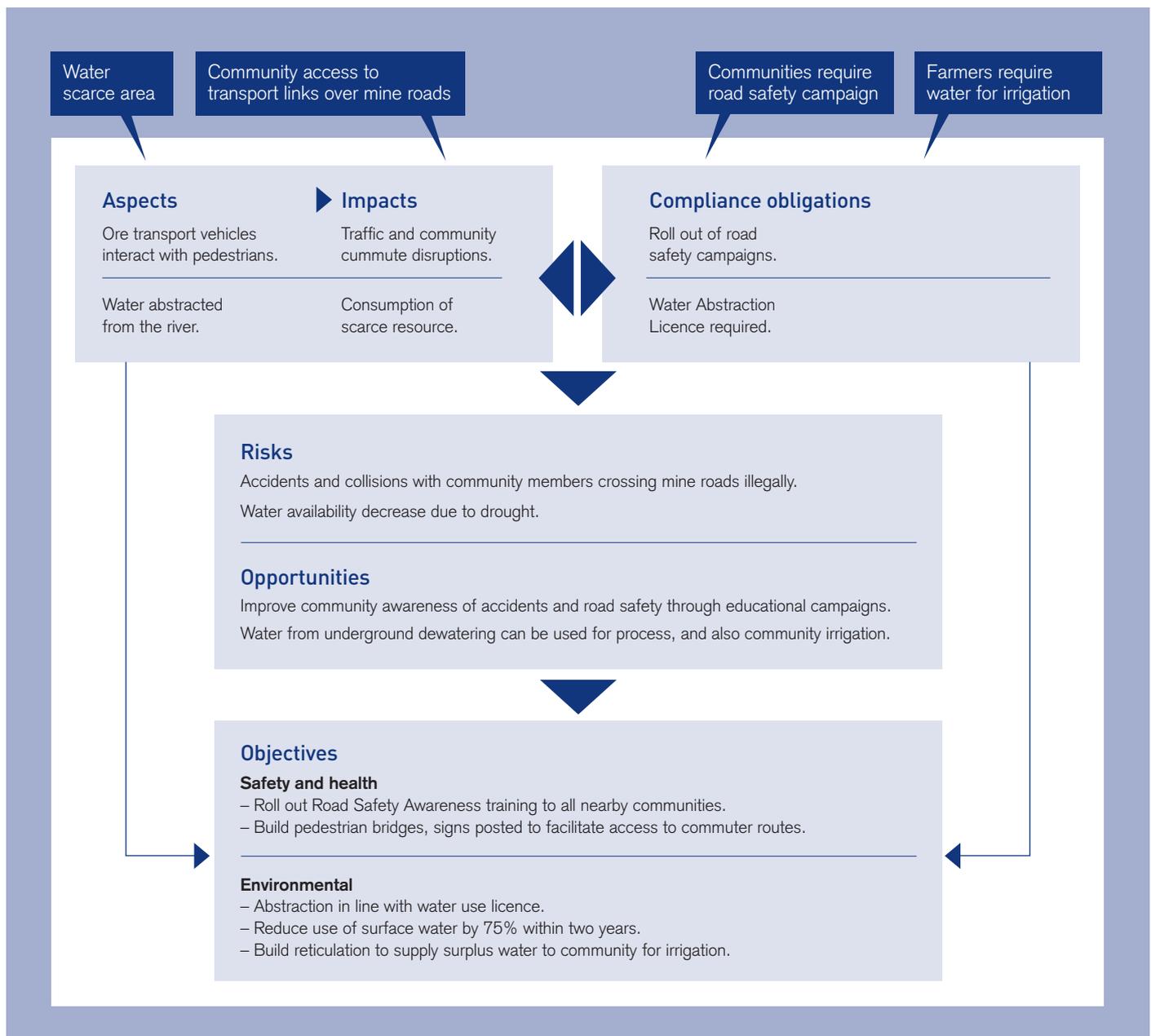
This section presents the requirements for proactive planning to ensure the SHE aspects and impacts resulting from our activities, our compliance obligations and the SHE-related risks and opportunities that could affect our work are understood and addressed. SHE risk management must be completed in line with Anglo American's integrated risk management approach, including its associated recommended practices, especially Operational Risk Management (ORM) and its associated procedures, guidelines, and templates. ORM is structured into four interrelated layers which build an approach to managing risk across all activities that affect the site. ORM is intended to support all 'on site' personnel manage priority unwanted events to minimise the likelihood of negative consequences and enhance the probability of positive outcomes.

PLANNING WITH THE SHE WAY



SECTION 6: PLANNING

PLANNING: PRACTICAL EXAMPLE



As part of planning, actions will be defined to address the business or operation's:

- SHE aspects with priority on significant impacts (see glossary for detail);
- Compliance obligations; and
- SHE-related risks and opportunities.

The actions will be integrated into the SHE management system processes, management strategies, operational plans, and other business processes, where relevant. The effectiveness of actions will be continually evaluated to ensure delivery of intended SHE outcomes, prevention or reduction of undesired impacts, and continual improvement of SHE performance (see Sections 8 and 9).

SECTION 6: PLANNING

6a. SHE aspects and impacts identification

Each Anglo American business or operation must determine the SHE aspects of its activities, products, by-products and services that it can control and those that it can influence, and their associated impacts, considering a life cycle perspective. An aspect is a feature characteristic of an activity, product or service that interacts with the environment and/or people and can affect them positively or negatively. The life cycle perspective considered will depend on the identified SHE aspects and the defined scope of the SHE management system and could either entail consideration of:

- the full life of the operation, from exploration and planning through to operation, closure and post-closure activities (including decommissioning, remediation and rehabilitation) (for example, quality and quantity of water used across the operational phases); or
- life of a material, product or substance from extraction, production, use and disposal (for example, relating to chemicals used on site).

When considering SHE aspects, the potential adverse or beneficial impacts on the environment and the safety and health of Anglo American personnel, contractors and business partners as well as communities, indigenous peoples, and other stakeholders must be considered. Significant SHE aspects must be identified using established criteria. An up-to-date register of SHE aspects and impacts must be established and maintained by operations. Significant aspects identified must be communicated amongst various levels of the organisation as appropriate. The identification and evaluation of SHE aspects and related impacts must be conducted by personnel with suitable SHE and operational experience and knowledge. The identification of SHE aspects and impacts forms part of the ORM Baseline Risk Management process which is designed to look across an entire operation systematically to identify and assess priority unwanted events (see Glossary) or significant risks, and opportunities. As part of this process, sites must consider the SHE aspects that arise from their activities, products and services and assess the significance of these aspects to identify significant impacts and inform the identification of SHE-related risks and opportunities. The process of identifying and evaluating SHE aspects and impacts must be:

- robust, drawing on insights from qualified personnel in a systematic manner, to ensure the validity of findings;
- comprehensive, taking into account SHE-related internal operational and external environmental and community factors;
- detailed enough so that users can comprehensively understand the identified SHE aspects and impacts;
- practical and user-friendly;
- repeatable (i.e. to provide consistent results); and
- auditable.

The identification of SHE aspects must take into account the following:

- the business or operation's activities, specifically considering
 - the Life of Mine (LoM) or life of operation plan,
 - planned and unplanned activities,
 - routine and non-routine work,
 - the work areas, processes, products and materials to deliver on activities,
 - supporting procedures and services,
 - all personnel, contractors, business partners, suppliers and visitors that participate in activities;
 - operating procedures and work organisation;
 - all machinery/equipment, facilities and installations;
 - work environment such as working at altitude or at sea; and
 - capabilities and human factors;
- the external environmental and community context relevant to the operation, including the operation's baseline community, environment and environmental conditions, both those that can be affected by or are capable of affecting the operation;
- planned and unplanned changes, including planned or new developments and new or modified activities, products and services;
- abnormal conditions including reasonably foreseeable emergency situations;
- a life cycle perspective, as appropriate, when considering activities including:
 - design and development of facilities, processes, products and services;
 - acquisition of raw materials;
 - operational or manufacturing processes;
 - operation and maintenance of facilities, organisational assets and infrastructure;
 - concurrent rehabilitation of areas to reduce long-term end of LoM liabilities;
 - SHE practice and performance of external providers;
 - product transportation and service delivery;
 - storage, use and end-of-life treatment of products; and
 - waste management, including reuse, refurbishing, recycling and disposal.

SHE aspects and impacts must be considered in accordance with the guidance provided within Anglo American's Group Technical Standards relating to SHE (see Glossary for detail) and in relation to our commitments for example to use natural shared resources such as water and energy efficiently.

SECTION 6: PLANNING

6b. Compliance obligations

Each Anglo American business or operation must maintain a formal register (or registers) of its compliance obligations relating to its SHE management system. Compliance obligations should be mapped to SHE aspects as part of the ORM process to support the identification of SHE-related risks and opportunities. This should include for example:

- requirements to comply with all applicable Anglo American Group Technical Standards and all other Group Standards and Policies;
- conditions of Environmental, Health and Social Impact Assessments and other authorisations and approvals, including commitments made as part of application process (e.g. in Environmental & Social Management Plans or in register of social commitments relating to SHE);
- legal requirements at all levels of government (e.g. national, state, provincial, local);
- international legislation, including treaties, conventions and protocols that are applicable within the operation's geography;
- standards and code of practice prescribed by law;
- guidelines and codes of practice accepted by the operation;
- voluntary initiatives that Anglo American, the business or the operation subscribes to; and
- stakeholder SHE-related needs and expectations that have been adopted as compliance obligations (see Section 5).

Each business and operation will determine how the compliance obligations apply to the operation and ensure that these are considered in establishing, implementing, and maintaining its SHE management system by:

- developing a process to maintain regular access to changes in legislation;
- providing training to meet its compliance obligations;
- ensuring SHE monitoring and audit programmes incorporate the operation's compliance obligations; and
- developing SOPs and other procedures that are in line with the compliance obligations.

6c. SHE-related risks and opportunities

Each Anglo American business or operation must determine the SHE-related risks and opportunities that could affect the achievement of the intended outcomes of the SHE management system, and which therefore need to be addressed through the SHE management system.

The identification of SHE-related risks and opportunities must be completed according to Anglo American's approach to ORM, specifically:

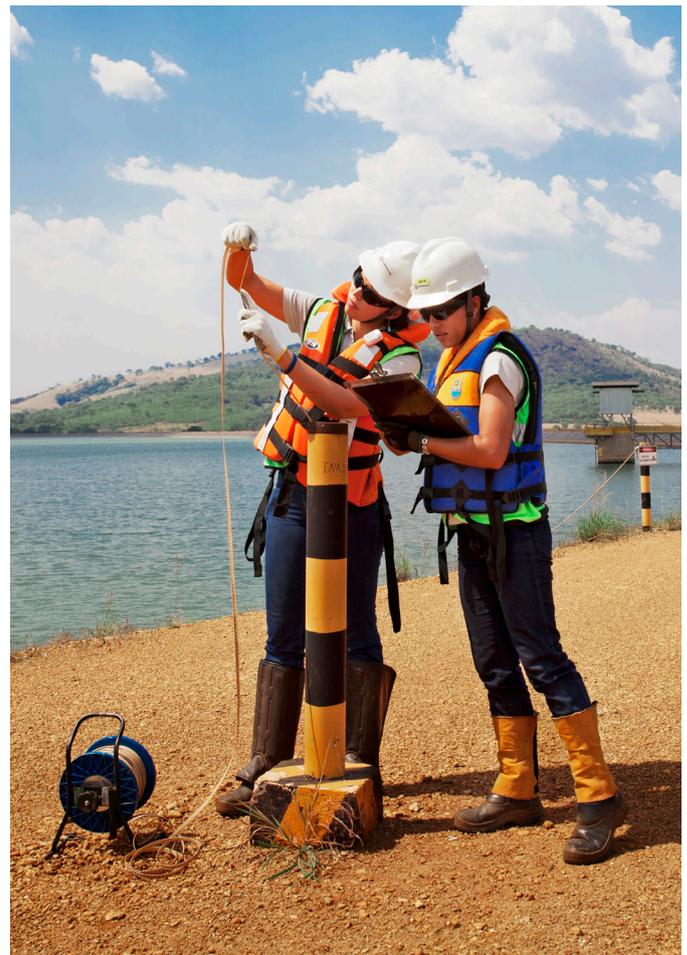
- the Baseline Risk Management process, which seeks

to systematically identify and analyse the risks and opportunities that can occur across an operation to identify the operation's priority unwanted events (significant risks that are rated as level 4 or 5 consequence as per Anglo American's ORM matrix), for which critical controls must be defined; and

- the Issue Based Risk Management process to understand and develop knowledge about significant risks and develop detailed control strategies.

The identification of SHE-related risks and opportunities must take into consideration the context of the operation, its compliance obligations, and the SHE aspects and impacts arising from its activities, products and services, adopting a life cycle perspective. Potential emergency situations that can affect the achievement of the intended SHE outcomes must be identified, assessed and documented as part of the SHE risks identification process and in alignment with the Social Way – this should include neighbours and potential off-site emergency and crisis situations (e.g. transport of personnel, hazardous material transport and employees performing work away from a fixed site).

Each Anglo American business or operation must maintain documented information of the SHE-related risks and opportunities that need to be addressed within ORM.



SECTION 6: PLANNING

6d. SHE objectives

Each Anglo American business or operation must establish, implement, maintain and document SHE performance objectives at relevant levels and functions throughout the operation. Objectives must:

- be consistent with the vision of Zero Harm, Anglo American SHE Policy and if relevant the business or operation's SHE Policy;
- reflect the business or operation's context, its SHE aspects and compliance obligations as well as the identified SHE-related risks and opportunities; and
- be SMART (Specific, Measurable, Achievable, Relevant and Time-bound).
- each Anglo American business or operation must define a plan(s) to achieve its SHE objectives.

This plan must clarify:

- the actions that will be completed and, where appropriate,

how these actions are or will be integrated into the operation's business processes;

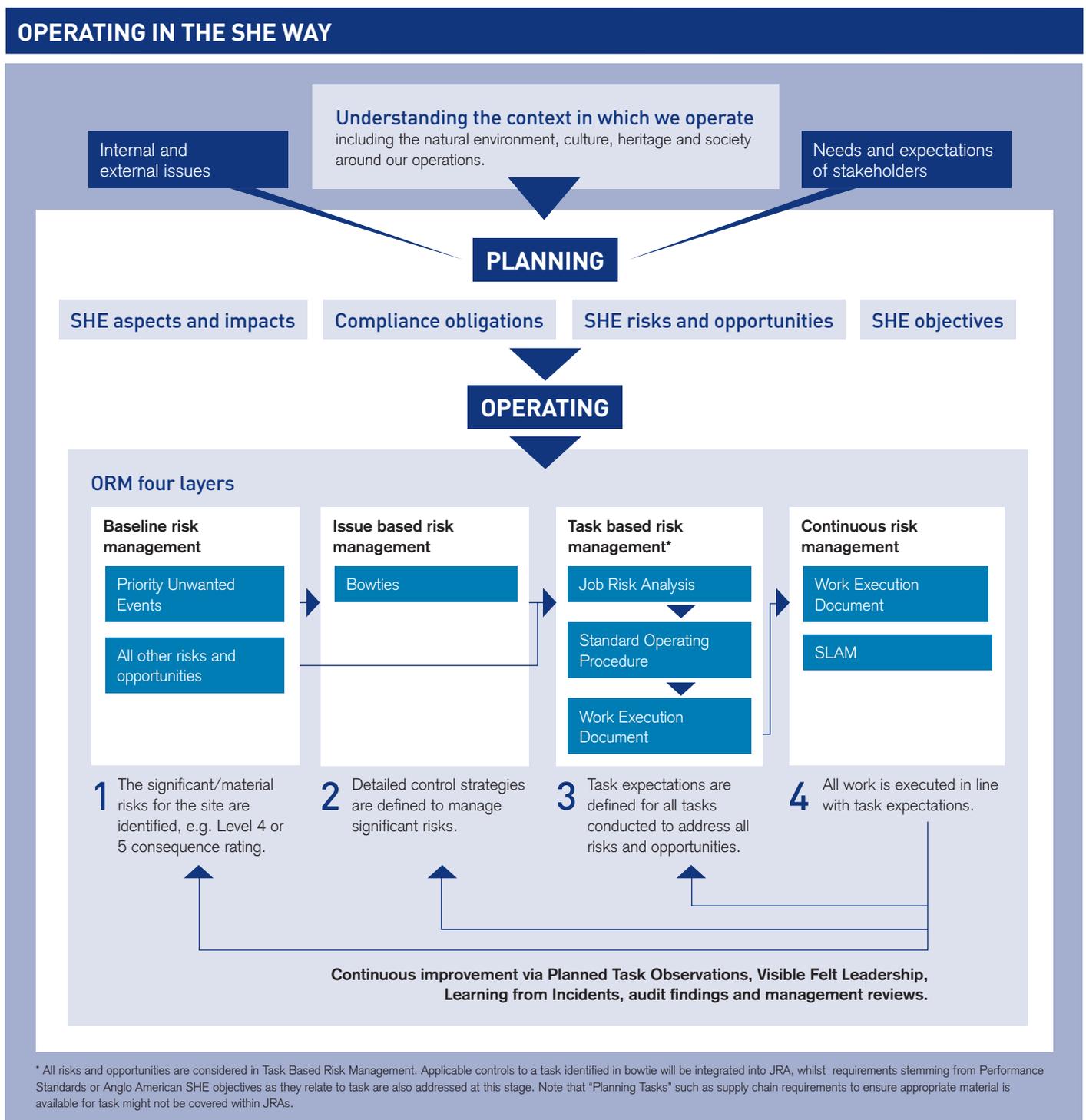
- the human, technical and financial resources that will be deployed to achieve objectives and integrate these into the operation's budget;
- the persons responsible and accountable for delivery of the identified actions - responsibilities must be clearly assigned, communicated and understood by all appropriate personnel, including senior management, line management, employees and contractors;
- the timeframes for achieving the objectives;
- the process for communicating on the defined objectives to all personnel, and relevant stakeholders as appropriate; and
- the framework for evaluating whether objectives have been achieved, including indicators for monitoring and reporting on progress toward achievement of SHE objectives.



SECTION 7: OPERATION

The Work Management component of the Anglo American OM stresses that 'If the work is planned, scheduled and properly resourced ahead of execution, the desired outcome will be achieved more consistently and at lower cost'. This section presents the requirements for our businesses and operations to ensure that all the work we execute is in line with our SHE plans and objectives.

This includes ensuring that our contractors and business partners operate in line with the requirements of our SHE management system, that SHE aspects arising through our value chain are controlled and that we are prepared for and have the capability to respond appropriately to reasonably foreseeable emergency situations. This is enabled by Anglo American's ORM which defines task and continuous risk management processes that are integrated to the Work Management element of the Operating Model.



SECTION 7: OPERATION

7a. Operational planning and control

Each Anglo American business or operation must establish, implement, control and maintain the processes needed to meet the SHE management system requirements and to implement the actions identified as part of Planning (see Section 6) in order to ensure:

- all identified SHE-related risks (e.g. risks with SHE consequences) are controlled;
- SHE aspects and impacts are managed;
- compliance obligations are met; and
- SHE objectives are achieved.

The controls to manage SHE-related risks and opportunities will be defined at the various stages of ORM as per the figure above.

For all priority unwanted events with significant SHE consequences (level 4 or 5 as per Anglo American's ORM matrix) relating to processes, products, services and activities, control strategies should be defined using the Bowtie Method as part of the Issue Based Risk Management.

For all other identified SHE-related risks and opportunities, controls will be put in place through Task Based Risk Management through which effective and productive task expectations are defined. Specifically, at this point, all SHE specific requirements and controls for SHE-related risks and opportunities tied to specific tasks will be considered within the Job Risk Analysis (JRAs) and integrated within SOPs where relevant. The controls identified using the Bowtie Method and which are specifically applicable to a task will be integrated into the work through the JRA method. Sites must ensure that any significant off-site risks (e.g. with offsite consequence level 4 or 5 as per Anglo American's ORM matrix) that relate to their activities are prioritised and controlled at a minimum. All controls must be defined in line with the principles of the hierarchy of control. It is a requirement that planned and unplanned work, including deviations from planned tasks, must be subject to the appropriate Task Based Risk Management prior to the commencement of the task. Where appropriate, opportunities for offsets should be considered by operations.

SHE-related risks and opportunities are continually assessed and addressed during work execution through the ORM's fourth layer of Continuous Risk Management which aims to have everyone 'stop and think' and then proceed with a task or activity only if safe to do so. Continuous risk management must be used by everyone to manage risk during task execution and ensure that controls are in place and appropriate to complete the work in line with SHE expectations. This should consider among others workplace conditions, behaviours and/or interactions. Everyone must be trained in Stop – Look – Assess – Manage (SLAM) tool and apply the practice as part of work execution.

Each Anglo American business or operation must adopt a life cycle perspective when defining controls and where

appropriate establish controls to ensure that:

- SHE requirements are addressed from the design and development process for our projects through to operation and to the end of life and closure of the asset/operation;
- procurement of products or services enable the operation to meet its SHE management system requirements; and
- potential significant SHE-related risks associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services are addressed.

Each Anglo American business or operations must define processes to ensure the effective review, at least on an annual basis, of operational control systems, measures, and processes to guarantee that they remain relevant and appropriate to the nature and extent of the associated SHE-related risks and maintain documented information to demonstrate implementation of controls and planned SHE actions. This includes but it is not limited to conducting regular PTOs and VFLs, ensuring that outcomes of these activities are captured and corrective actions implemented.

7b. Contractor management

Each Anglo American business or operation must have a formal contractor management system (CMS). This system must be appropriate to the nature and extent of the SHE-related risks and opportunities associated with Contractors and Business Partners' (C&BPs) activities (See Glossary for detail) and ensure that all C&BPs undertake their activities in line with the requirements of the SHE Way. Specifically, the CMS must include:

- SHE criteria for selection of C&BPs;
- requirements to ensure that SHE criteria are built into contracts with C&BPs, including a requirement to comply with the SHE Way;
- a governance framework including clear and documented reporting relationships, lines of consultation and communication, roles, responsibilities, accountabilities and (where appropriate) system interfaces between C&BPs and the operation. This must include identification and appointment of a contractor management coordinator;
- SHE performance reporting requirements for C&BPs and a process to address and rectify any non-compliance;
- a process to periodically evaluate C&BPs based on their performance against the defined SHE criteria, their alignment to the SHE Way and the site's compliance obligations and to identify opportunities for continuous improvement of C&BPs SHE performance; and
- process for monitoring compliance with and enforcing the implementation of all SOPs relevant to C&BPs work, as well as auditing contractor work areas.
- The CMS must be reviewed at least annually to ensure that it remains relevant and appropriate to the nature and extent

SECTION 7: OPERATION

of the associated SHE-related risks and opportunities. Documented information to demonstrate implementation of CMS must be kept by operations.

7c. Management of change

Each Anglo American business or operation must develop, implement and maintain a formal management of change programme to control planned and unplanned changes that could impact SHE performance, such as:

- changes to applicable compliance obligations including legal requirements;
- changes in knowledge or information about SHE aspects and associated SHE-related risks;
- developments in knowledge and technology or the operation's context;
- introduction of new machinery or equipment;
- introduction of new/additional facilities and/or activities;
- introduction of new products (chemicals);
- significant changes in operational activities and/or processes,
- unplanned activities;
- changes in work shifts;

- planned and unplanned changes;
- changes to operational arrangements including personnel and work processes changes;
- changes in the workplace or external environment;
- organisational changes;
- seasonal changes;
- issues that are identified through incident investigation or other input;
- introduction or changes in the use of contractors; and
- modifications to the operational management system(s) at global, regional or managed operation levels.

In the case of planned changes or unplanned changes, permanent or temporary, the identification of SHE-related risks must be undertaken before the change is implemented.

The management of change programme must clarify:

- the roles and responsibilities for change management;
- how actions associated with change management will be tracked to closure;
- process for communicating with internal and external stakeholders on change management; and
- requirements to monitor the controls in place following the change management process.



SECTION 7: OPERATION

7d. Emergency preparedness and response

Each Anglo American business or operation must establish, develop, document and implement plans to prepare for and respond to the reasonably foreseeable emergency situations identified through ORM (where this is implemented) or the SHE risk assessment process (see Section 6: Planning). The process should be defined to ensure business continuity and in alignment with the requirements of the SHE Way. Specifically, operations must:

- prepare to respond by planning actions to prevent or mitigate adverse SHE impacts from emergency situations;
- respond to actual emergency situations;
- take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential SHE impact;
- identify the appropriate resources, both on and off site, to ensure the effective implementation of the emergency situation arrangements. These resources shall include personnel, occupational health practitioners, organisations, equipment, medical facilities and warning devices necessary for emergency response. All equipment and warning devices must be identified, maintained, tested and available;
- review and revise, at least on an annual basis and following any emergency or crisis situations, the defined emergency processes and planned response actions to ensure they remain relevant and appropriate to the nature and extent of the associated SHE-related risks;
- ensure that all relevant personnel, contractors, visitors, and relevant community stakeholders, and regulatory agencies are familiar with the requirements of the emergency situation arrangements and of their respective roles and responsibilities in the situation, and are competent to deliver on these requirements (training should be provided where required);
- all SHE practitioners, occupational health practitioners and responsible operational people shall have access to up-to-date Material Safety Data Sheets (MSDSs) and HAZMAT documentation;
- communicate relevant information to contractors, visitors, emergency response services, government authorities, and, as appropriate, the local community relating to emergency situations and responses; and
- have a documented detailed emergency response plan outlining the specific actions to be followed (and responsibilities) during an emergency.

Emergency response drills shall be conducted at a regular and defined frequency (on an annual basis at a minimum) to determine the effectiveness of the emergency situation arrangements, and should include all relevant SHE practitioners, social specialists and responsible operational people. Where appropriate, the drills shall include liaison with and involvement of external response organisations and other external stakeholders. Lessons learnt shall be documented and incorporated into revisions of the arrangements.



SECTION 8: PERFORMANCE EVALUATION

A fundamental step in our approach to SHE management to achieve our vision of Zero Harm is performance measurement and evaluation. Our businesses and operations must continually measure and assess their SHE performance against the requirements of the SHE Way, their defined SHE objectives and the management of SHE-related risks and opportunities.

This includes understanding the performance of our contractors and business partners, and other elements of our value chain, such as supply chain, where these are within the scope of our SHE management system. This section presents the requirements for evaluating our SHE performance. This is supported by our approach to SHE auditing and self-assessments.

8a. Monitoring, measurement, analysis and evaluation

Each Anglo American business or operation must prepare and implement a detailed SHE monitoring plan that will enable it to measure, analyse, evaluate and report on its SHE performance against its defined objectives and the SHE Way. Specifically, the evaluation of performance must:

- confirm that facilities are being operated within the parameters defined through the Planning and Operational Control process (see Sections 6 and 7);
- confirm the effectiveness of the management measures to enable the site to meet its SHE objectives;
- assess performance against the defined SHE objectives, which encompass the compliance obligations; and
- ensure that SHE risks and impacts are adequately controlled as per the hierarchy of controls.

The SHE monitoring plan must clarify:

- what needs to be monitored and measured;
- the methods for monitoring, measurement, analysis and evaluation to ensure valid results, including requirements for calibration and verification. This should include consideration of the potential for participatory monitoring, where applicable;
- the criteria and indicators against which SHE performance will be evaluated - these must be in line with the defined SHE objectives and compliance obligations; and
- the frequency of monitoring and measurement, as well as analysis, performance evaluation and reporting.

The results of the performance evaluation process must be retained as documented information and communicated to internal and external stakeholders in line with the defined stakeholder engagement and communication processes and as required by compliance obligations.

8b. Compliance

Each Anglo American business or operation must establish, implement and maintain a process to evaluate the fulfilment of its compliance obligations and maintain knowledge and understanding of its compliance status. The evaluation of compliance status must:

- be completed at an appropriate frequency (on an annual basis at a minimum);

- be based on appropriate and clearly defined methods for evaluation;
- be documented; and
- lead to appropriate actions to ensure compliance.

8c. SHE Way audit

Each Anglo American business or operation must establish, document and maintain an annual audit programme to ensure conformance with the requirements of the SHE Way.

The audit programme must be supplemented by regular self-assessments against the SHE Way. Self-assessments must be completed at least annually and more frequently if required to respond to specific issues such as incidents or requests from Group. Operations must ensure:

- the scope, frequency, and methodology of the internal audit programme, including defined audit criteria, are determined based on the results of SHE risk assessments, previous audits, changes that might affect the organisation and the nature and scale of the identified SHE aspects and impacts;
- the objectivity and impartiality of the audit process;
- the persons completing the audit have the right competencies and skills to complete the audit;
- timely closure of actions identified through the audit;
- the results of the audits are reported to relevant management and appropriate stakeholders as required by communication processes and compliance obligations; and
- evidence of the audit process and results are documented and retained.

The business or operation management system will be subject to regular third party audits, for example for ISO certification or Group level audits to ensure alignment with the SHE Way.

SECTION 8: PERFORMANCE EVALUATION

8d. Management review

Managers at each Anglo American business or operation must periodically (on an annual basis at a minimum) review the SHE management system to ensure its continuing:

- suitability and fit with the organisation, its operations, culture, business systems, and the external environment and societal context for the site;
- adequacy in terms of meeting the requirements of the SHE Way through its implementation; and
- effectiveness in achieving the desired results.

The following elements must be considered as part of the management review:

- the status of actions from previous management reviews;
- any changes in the organisation's context, including the external and internal issues that can impact on SHE outcomes, its compliance obligations, its SHE aspects and significant impacts, and SHE-related risks and opportunities;
- the extent to which SHE objectives have been achieved;
- the organisation's SHE performance, as reflected by trends in incidents, nonconformities and corrective actions, monitoring and measurement results, compliance status, and audit results;

- adequacy of resources to maintain an effective SHE management system;
- any relevant communications from stakeholders, including complaints; and
- opportunities for continual improvement.

Through the management review process, managers at each Anglo American business or operation must reach conclusions on the suitability, adequacy and effectiveness of the SHE management system and make decisions related to:

- continual improvement opportunities, including improving integration of the SHE management system with other business processes;
- any changes, including resources needed, to the SHE management system;
- actions required, especially when SHE objectives have not been achieved; and
- implications for the strategic direction of the organisation.

The outputs of the management review must be documented and retained and, where relevant, communicated to stakeholders in line with the defined communication processes and as required by compliance obligations.



SECTION 9: IMPROVEMENT

We are committed to continual improvement of our SHE performance to achieve and maintain our vision of Zero Harm. Our business and operations shall establish, implement and maintain a process to continually improve the suitability, adequacy and effectiveness of the SHE management system, which includes identifying and implementing necessary actions to prevent SHE incidents, address nonconformities and improvements opportunities, and enhance SHE performance. This process must consider the outputs stemming from our performance evaluation, including audits, self-assessments, and management reviews of SHE performance.

This section presents the requirements to drive continuous improvement of our SHE management system. This is supported by Anglo American's Learning from Incidents (LFI) process. This process ensures that SHE incidents are reported, recorded, analysed, investigated, and causes are identified, risk profiles are updated, learnings are shared and corrective and improvement actions are implemented across the Group to ensure the creation of a sustainable corporate memory and effective knowledge management.

When a SHE incident occurs, the concerned Anglo American business or operation must address the incident by taking action to investigate the cause and identify corrective actions to control it. The consequences of the incident must be dealt with in line with defined emergency response plans (if appropriate).

Each Anglo American business or operation must use the Anglo American mandated system for the reporting, investigating, closing-out (including management sign off) and communicating SHE incidents in accordance with the requirements of the Anglo American LFI process. The objectives of the incident investigation and analysis process are to:

- gather all relevant information and evidence;
- determine what happened;
- define a sequence of events leading up to, including, and after the incident;
- determine direct, contributing and root causes of the incident;
- identify the control(s) that failed and resulted in the incident;
- define actions, including new controls and improvement of current controls, to prevent repeat occurrences or similar incidents from occurring in the future, including any required changes to the SHE management system and reviewing the effectiveness of the corrective actions taken; and
- share lessons learnt to enhance organisational learning and institutionalise change.

An incident investigation team must be composed as per the requirements of the LFI guidelines and depending on the severity of the incident. Incidents with a level 4 or 5 consequence must be shared with Executive Management and the Board of Directors and the following requirements around analysis must be met:

Incident severity	Incident investigation/analysis lead
Level 5 – Actual or Potential	Business Unit/Group
Level 4 – Actual	Business Unit/Group
Level 4 – Potential	Operation/Business Unit
All other incidents	Department/Operation

The LFI process must be documented.

Each Anglo American business or operation must define a process to categorise and if appropriate investigate and address nonconformities with the SHE Way requirements (See Glossary for detail) in accordance with the principles of the LFI process. Specifically:

- clarify a process for categorising nonconformities and identifying which ones require an investigation (e.g. major nonconformity relates to absence of a requirement of the SHE management system, minor nonconformity relating to instances where part of the requirements of the SHE management system are not addressed, and observation which does not constitute a nonconformity but could lead to a nonconformity);
- complete an investigation of the nonconformity which considers all relevant information and evidence to determine direct, contributing and root causes of the nonconformity;
- define actions to address the nonconformity, including any required changes to the SHE management system and reviewing the effectiveness of the corrective actions taken; and
- share lessons learnt and specifically ensure that actions are implemented to address circumstances where similar nonconformities exist or could potentially occur.

SECTION 10: SUPPORT

We must apply the right resources, including human resources, natural resources, infrastructure, technology and financial resources, to ensure the effective functioning and improvement of our SHE management system and to enhance our SHE performance. This is in line with our operating principles which require work to be planned, funded, resourced and scheduled to meet Anglo American's requirements before it can take place.

Importantly, we must ensure that our employees and contractors are aware of how they can impact SHE outcomes and are competent to complete their activities to achieve Zero Harm, and provide strong governance systems to communicate on our SHE performance both internally and externally using robust information. This is supported by our approach to training and capacity building and communications.

10a. Competence

Each Anglo American business or operation must have a formal system(s) in place to ensure that their personnel, C&BPs are competent to perform their activities in alignment with the SHE Way and to meet Anglo American's SHE intended outcomes. This must include:

- clearly defining the SHE competencies required to fulfil duties in terms of education, training and experience for all organisational roles, positions and job functions that can affect SHE performance;
- assessing competencies of personnel and contractors, as part of recruitment, job selection and personnel movements;
- providing training, refresher training, and coaching to personnel with roles and responsibilities for SHE management, especially in the context of aspects and impacts identification, risk evaluation and management, compliance evaluation and change management;
- delivering training programmes in an effective and appropriate medium that take into consideration the cultural and educational diversity of the workforce as well as the varying levels of responsibility, ability, language skills, literacy and workplace SHE-related risks that must be addressed;
- reviewing the effectiveness of training systems and processes on a periodic basis to ensure that they remain relevant and appropriate to the nature and extent of the operation's SHE-related risks; and
- retaining appropriate documented information as evidence of competence.

10b. Communication and awareness

Internal communication

Each Anglo American business or operation must develop and implement a process(es) to ensure effective consultation, participation and communication of matters relating to SHE across all levels and functions of the organisation. The defined process(es) must:

- clarify, within a communication plan, the modes of communication, timeframes for communication, contents of communication, roles and responsibilities for communication

(e.g. Safety representative) and the target audience for communications;

- at a minimum drive awareness internally of:
 - SHE policies, significant SHE aspects and significant impacts and SHE-related risks and opportunities associated with a person's work,
 - the role of individuals in contributing to the effectiveness of the SHE management system, and
 - the implications of non-conformance with SHE requirements including defined compliance obligations,
- ensure effective communications by taking into consideration the cultural and educational diversity of the workforce, their varying levels of responsibility, ability and exposure to SHE-related risks;
- be reviewed periodically to support continuous improvement of the SHE management system;
- communicate SHE information in a manner that is both reliable and consistent with the information generated within the SHE management system to enable effective decision making to improve performance;
- ensure changes to the SHE management system are timeously communicated; and
- ensure that appropriate documented information is retained as evidence of consultation, participation and communication.

External communication

Each Anglo American business or operation must develop and implement a process(es) to communicate externally with stakeholders on information relevant to its SHE management system and the fulfillment of its compliance obligations, as well as to respond to relevant communications on its SHE management system. This must be aligned to Anglo American's process for stakeholder engagement and integrated into the site's Stakeholder Engagement Plan as per the Anglo American Social Way requirements. All external communication must also comply with Anglo American's Disclosure & Media Policy, particularly in relation to incidents that may have a material impact on the business.

SECTION 10: SUPPORT

10c. Documented Information

Each Anglo American business or operation must establish, document, implement and maintain a system(s) to control the documented information (see Glossary for detail) necessary to support the effectiveness of the SHE management system and fulfilment of compliance obligations. This should align and integrate with the operation's document management approach.

The system(s) must:

- clarify a procedure for the identification, storage, preservation, protection, retrieval, retention (e.g. duration over which documents are kept), update, review, approval, distribution, access and disposal of documented information;
- ensure documented information is maintained, periodically reviewed and approved for adequacy and accuracy by authorised personnel to ensure that it is appropriate and understandable;
- be available, understandable and legible, and suitable for use, where and when it is needed;
- be adequately protected and preserved (e.g. from loss of confidentiality, improper use, or loss of integrity); and
- include a process to ensure that documents from external sources necessary for the planning and operation of the SHE management system are identified, registered and current, and in a suitable format, either paper or electronic, and their distribution controlled.



SECTION 11: SHE WAY DELIVERABLES

The table below summarises what deliverables must be produced as part of the implementation of the SHE Way and highlights where they are to be kept.

Contents	Deliverables	Systems/support
Section 4: Context of the organisation	<ul style="list-style-type: none"> Documented information relating to external/internal issues. SHE Commitments identified within the register of SHE compliance obligations. Documented Scope of SHE management system. 	<ul style="list-style-type: none"> Documents should be made available on Eureka! (where there are no confidentiality issues) or on a secured shared drive. Legal registers are available in Enablon within Legal & Regulatory module (updated automatically with new legal requirements as they arise by content provider), and operations can add specific obligations or commitments (e.g. relating to permits/licences/ stakeholder expectations) as required.
Section 5: Leadership		
5a. Leadership and commitment	VFLs and other leadership engagements.	All VFLs should be recorded and any identified actions tracked within Enablon until closure.
5b. Policy	SHE policy.	The SHE policy must be available in Eureka! (versioned/ tracked).
5c. Roles, responsibilities and authorities	Documented SHE roles and responsibilities.	Maintained within SAP HR.
Section 6: Planning		
6a. SHE aspects and impacts	Register of SHE aspects and impacts.	It is planned that a process will be defined so that the ORM integrated baseline will feed into the Enablon Aspects & Impacts module (2017).
6b. Compliance obligations	Register of compliance obligations.	In Enablon expanding on existing legal register within Legal & Regulatory module.
6c. SHE-related risks and opportunities	Supported by ORM Layer 1 and 2 - with identifiable SHE-related risks and opportunities.	ORM deliverables are captured within Enablon (with Bowtie XP).
6d. SHE objectives	<ul style="list-style-type: none"> Documented SHE performance objectives. Plan(s) to achieve SHE objectives. 	Enablon has a Target & Objectives module (potential release in 2017) but currently SHE objectives and plans will be maintained on secured shared drive.
Section 7: Operation		
7a. Operational planning and control	All Layer 3/ 4 ORM deliverables (JRAs, SOPs and WEDs) as well as control strategies for priority unwanted events with SHE consequences.	<ul style="list-style-type: none"> Tools to support Layer 3 integrated within Work Management in Enablon. JRAs/ WEDs (Feb 2017) – workflows, actions, comments, approvals. SOPs on secured shared drive/ Eureka (for live documents).
7b. Contractor management	Contractor management system.	Maintained within secured shared drive.
7c. Management of change	Management of change programme.	Maintained within secured shared drive.
7d. Emergency preparedness and control	Emergency response plan(s).	Maintained within secured shared drive.

SECTION 11: SHE WAY DELIVERABLES

Contents	Deliverables	Systems/support
Section 8: Performance evaluation		
8a. Monitoring, measurement, analysis and evaluation	SHE monitoring plan(s) and reports.	<ul style="list-style-type: none"> Enablon supports monitoring/reporting through the SHE metrics module (contains all metrics reported in Sustainability Report). There are plans to sample tracking for certain disciplines – in 2016 hygiene, in 2017 environment (inc. air, land, water).
8b. Compliance	Documented compliance status.	In Enablon expanding on existing legal register within Legal & Regulatory module.
8c. SHE Way audit	<ul style="list-style-type: none"> Self-assessment. Results of internal/external audits. 	All audit findings and the self-assessments are tracked within Enablon's ACS Module (Audit Compliance Strategies).
8d. Management review	Documented outputs of management review.	Maintained within secured shared drive, unless specific actions tracked as part of Enablon.
Section 9: Improvement	Investigations.	<ul style="list-style-type: none"> Enablon Incident & hazards modules is used for recording all incidents/non conformances. Enablon Incident investigation module supports investigations and sharing learnings.
Section 10: Support		
10a. Competence	SHE competencies and training matrix and records of completion.	Maintained within SAP HR.
10b. Communication and awareness	Documented internal & external SHE communication process/ plan and associated communications.	Maintained within Eureka! for collaboration meetings and secured shared drive for all other documents.
10c. Documented information	SHE document management system aligned to Enablon.	Maintained across Eureka! and secured shared drive depending on confidentiality.

SECTION 12: GLOSSARY OF TERMS

Term	Definition
Aspect	<p>An aspect is a feature characteristic of an activity, product or service that interacts with the environment and/or people and can affect them positively or negatively. Some examples of aspects that should be considered as part of SHE management are provided below.</p> <p>Transportation and specifically road transport is an activity for which a range of SHE aspects must be considered:</p> <ul style="list-style-type: none"> • Safety aspects, such as interaction with pedestrians, other vehicles or the road that can lead to accidents; • Health aspects such as exposure to physical stressors such as noise or vibration, or driver fatigue and stress; and • Environmental aspects such as the use of fuel, greenhouse gas emissions and spills. <p>Consideration must be given to the social and human rights risks and impacts associated with SHE aspects. The SHE aspects that are tied to our activities must be systematically understood and captured in an 'aspect register'. For environmental aspects specifically, sites must understand when these lead to changes to the environment, either adverse or beneficial, that result wholly or partially from the identified environmental aspects. Environmental impacts can occur at local, regional and global scales, and also can be direct, indirect or cumulative by nature. Significant environmental impacts are identified based on defined criteria. It should be noted that within the ISO terminology, OH&S aspects are typically referred to as 'hazards'.</p> <p>In terms of ORM, aspects are clarified within the 'hazards inventory' which is defined as part of Baseline Risk Management.</p>
Compliance obligations	<p>Compliance obligations denote the new terminology for 'legal and other requirements' under ISO. They relate to legal requirements that an organisation has to comply with and other requirements that an organisation has to or chooses to comply with. Compliance obligations can arise from mandatory requirements, such as applicable laws and regulations, or voluntary commitments, such as organisational and industry standards, contractual relationships, codes of practice and agreements with stakeholders such as community groups or non-governmental organisations.</p>
Contractor and business partner (C&BP)	<p>C&BPs' arrangements must include temporary activities, discrete projects of finite duration, and those engaged under contract to carry out specific, short-, medium- and long-term tasks or services within operations.</p>
Documented information	<p>Documented information, as per ISO, refers to information required to be controlled and maintained by an organisation and the medium on which it is contained. Documented information can be in any format and media, and from any source. It can refer to:</p> <ul style="list-style-type: none"> • The SHE management system, including related processes; • Information created in order for the organisation to operate (can be referred to as documentation); or • Evidence of results achieved (can be referred to as records).
Incidents	<p>An incident is an event which leads or may lead to the actualisation of risk. An event, which instantaneously or over the course of time, harms or has the potential to harm or otherwise negatively impact people, the environment, company assets (i.e. plant, property or equipment) and/or the company's reputation. Within Anglo American, the following terminology should be noted:</p> <ul style="list-style-type: none"> • High potential hazard (HPH): a condition or situation which could materialise into a consequence rating of 4 (High) or higher as referenced on the Group Risk Rating Matrix, • High Potential Incident (HPI): an incident with an actual consequence rating of 3 (Moderate) or lower but possessing a reasonable worst case potential consequence rating of 4 (High) or higher when referring to the Anglo American Group Risk Rating Matrix.
ISO Standards	<p>The SHE Way is aligned to the requirements of ISO 45001 which are understood to also cover the requirements of OHSAS 18001, as well as the requirements of ISO 14001: 2015</p>
Nonconformity	<p>Any deviation from work standards, practices, procedures, regulations, SHE Way requirements and expected SHE management system performance for example tied to SHE objectives etc., that could, either directly or indirectly, lead to injury or illness, property damage, damage to the environment, or a combination of these.</p>
Priority Unwanted Event	<p>An event with a minimum consequence rating of either 4 or 5 (high or major) in respect to the Anglo American ORM matrix.</p>
Stakeholders	<p>Interested or affected parties, including: neighbouring communities and businesses; local, regional and national governments (i.e. the authorities); employees, contractors and suppliers; non-governmental organisations (NGOs) and community based organisations (CBOs); media groups; other Anglo American operations and Anglo American corporate centre. (Definition as per Anglo American Social Way)</p>

SECTION 12: GLOSSARY OF TERMS

Term	Definition
Issues	<p>Issues are defined within ISO as important topics for the organisation, problems for debate and discussion or changing circumstances that affect the organisation's ability to achieve the intended outcomes it sets for its SHE management system. Both internal and external issues should be considered. Examples include:</p> <ul style="list-style-type: none"> • Internal characteristics or conditions of the organisation, for example its activities, products and services, strategic direction, culture and capabilities (i.e. people, knowledge, processes, systems); and • External cultural, social, political, legal, regulatory, financial, technological, economic, natural and competitive circumstances, whether international, national, regional or local. This covers the introduction of new competitors, contractors, suppliers, partners and providers, new technologies, new laws and the emergence of new occupation. From an environmental point of view, external conditions related to climate, air quality, water quality, land use, existing contamination, natural resource availability and biodiversity, which can either affect the organisation's purpose or be affected by its environmental aspects, should be considered. <p>Any changes to the identified issues should be considered and addressed if they are likely to impact on SHE outcomes. A range of documents can be considered to understand the internal and external issues that frame the organisation's context, such as:</p> <ul style="list-style-type: none"> • History of the site and area, including SHE baseline studies completed as part of impact assessments; • Strengths – Weaknesses – Opportunities – Threats (SWOT) and Political – Economic – Social – Technology – Legal – Environmental (PESTLE) type analyses conducted as part of strategy development or business planning; • Group/BU Strategies and Policies; • Anglo American values and principles; • Results of internal and external audits; • Government policy and developments; • Social Performance Strategy defined as part of Social Way; and • Anglo American Corporate Material Sustainability Issues reported annually • Etc.
Performance Standards	<p>Anglo American has developed a range of Performance Standards that cover key management system areas and SHE aspects & impacts. These Standards contain mandatory, high level requirements set at corporate level. They support the Anglo American SHE Vision, Principles and Policy and outline the required approach to avoiding or minimising the potential adverse SHE impacts associated with our activities. Each Performance Standard is supported by guidelines or tool boxes e.g. Mine Closure Tool box.</p> <p>Some Performance Standards that should be considered and to which operations must comply include:</p> <ul style="list-style-type: none"> • Social & Environmental Impact Assessment (S&EIA) • Water • Air quality • Mineral residue • Non-mineral waste • Hazardous substances • Biodiversity • Rehabilitation • Mine closure • Group Technical Standards

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