





# WHAT IS THE SHE WAY?

The SHE Way is our Safety, Health and Environmental management system.

It brings to life our values and our principles of Zero Mindset, No Repeats and Simple Non-negotiable Standards and is essential to achieving the goals our FutureSmart Mining™ programme.

This SHE Way Standard explains what Anglo American businesses and operations must include in their SHE management system. It is part of a suite of documents including the SHE Policy, SHE Way Specifications and SHE Way Toolkit, Technical Standards (AA TS) and Safety and Sustainable Development Standards (SSD) and Specifications, External Standards and Certifications adopted by Anglo American.

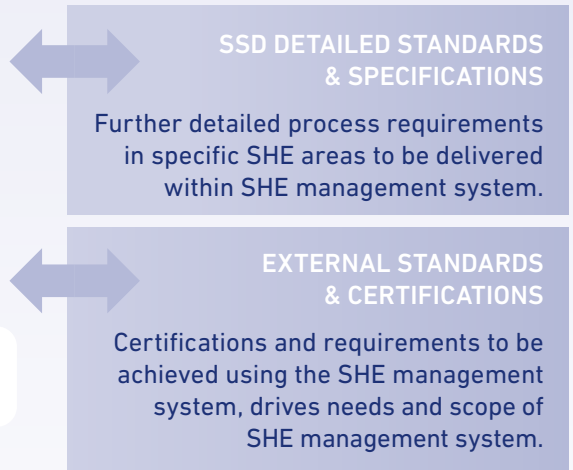
## SHE POLICY PRINCIPLES AND WHY?

The SHE Way policy describes how the management of SHE applies to everyone in Anglo American and the Big 3 SHE principles of Zero Mindset, No Repeats and Simple Non-negotiable Standards. To view the full policy document, [click here](#).



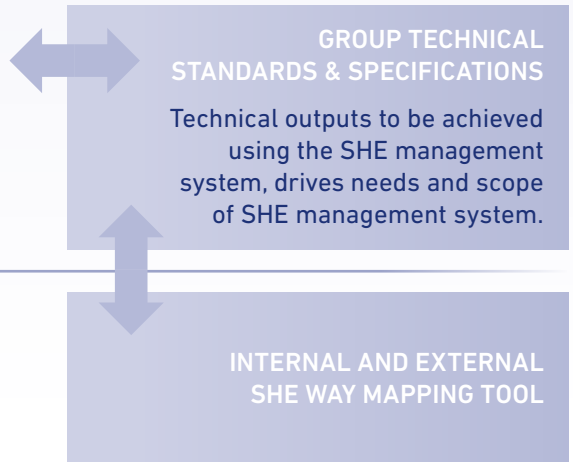
## SHE WAY STANDARD REQUIREMENTS & WHAT?

The SHE Way standard aligned to ISO 45001:2018 and ISO14001:2015, sets out the requirements of 7 core elements of our SHE management systems.



## SHE WAY SPECIFICATION DETAILED REQUIREMENTS & WHAT TO DO

The SHE Way Specification sets out what is needed per element to meet the SHE Way Standard including deliverables, documented evidence and mapping to other Standards (internal and external). To access the full Specifications [click here](#).




## SHE WAY TOOLKIT TOOLS, TEMPLATES & EXAMPLE DOCUMENTS

The SHE Way toolkit provides tools and templates that can be used to meet the requirements. To access the toolkit [click here](#).



# THE 7 SHE WAY ELEMENTS




**LEADERSHIP**

We apply leadership so that SHE priorities are central and integrated into our activities, performance targets and objectives.

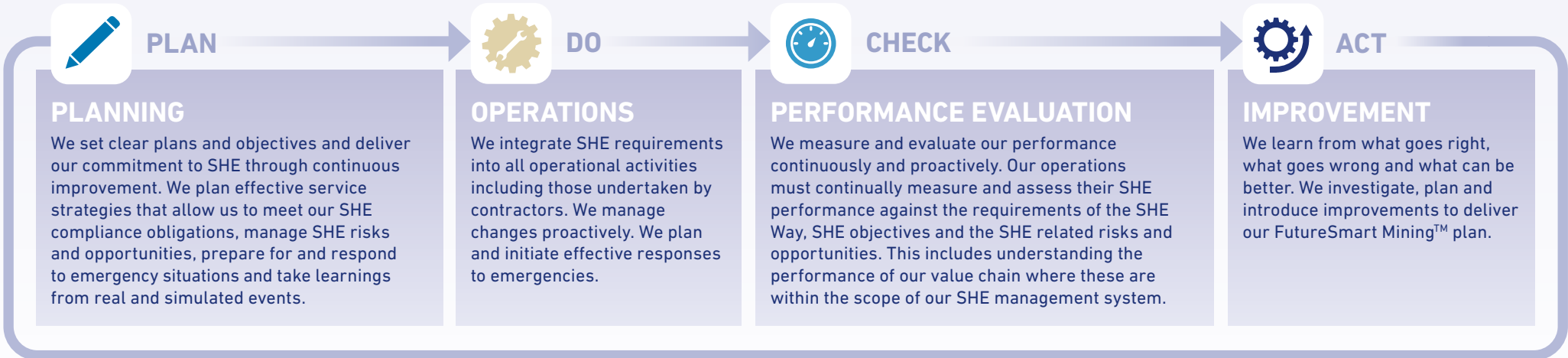
We want to create an environment where we are all empowered to make the correct decisions on SHE accountable for our actions, ready to learn and share new ideas; and where together we can keep improving health, safety and environmental conditions for everyone.

We want everyone to feel support to have the courage to speak up and stop work if conditions are felt unsafe or unhealthy to continue, or if they risk harm to the environment, communities or society.



**CONTEXT**

We set the boundaries for a fit for purpose SHE management system by understanding where, how, with and for whom we operate and their SHE needs and expectations.





**SUPPORT**

We support the SHE Way with the right people at the right place doing the right work in the right way to drive SHE excellence.

We engage with and include everyone in our SHE journey, expecting everyone to actively participate and contribute.



# LEADERSHIP

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We want to create an environment where we are all empowered to make the correct decisions on SHE accountable for our actions, ready to learn and share new ideas; and where together we can keep improving health, safety and environmental conditions for everyone. We want everyone to feel support to have the courage to speak up and stop work if conditions are felt unsafe or unhealthy to continue, or if they risk harm to the environment, communities or society.

## Leadership and Commitment

→ We must all commit to becoming the best possible SHE leader we can be in line with the Anglo American values and behaviours and create the space to speak up. We must conduct all activities in line with our principles of Zero Mindset, No Repeats and Simple Non-negotiable standards.

→ All managers must take overall SHE accountability. Managers must set high standards, lead by example, communicate openly, confront risk and involve our people and stakeholders in SHE management. Supervisors must ensure compliance, encourage the team, promote risk awareness and involve the team.

→ Anglo American management businesses and operations must implement, operate, maintain and continually improve a SHE management system compliant with the SHE Way and **Group SHE Policy**.

## SHE Policy

→ To demonstrate our commitment and meet legal and other requirements to which we subscribe, Anglo American managed businesses and operations must establish a formal SHE Policy that conforms with the **Group SHE Policy** and includes any additions needed for local legal and regulatory requirements. The policy must be available, displayed and communicated across the organisation and to stakeholders as appropriate.

→ Where Anglo American does not manage a project, but it is associated with a project through a business relationship (such as a joint venture or other business partnership), Anglo American responsible persons / designated person must seek to influence the relevant project to adopt a SHE management system and policy in line with the requirements of the **Group SHE Policy** and SHE Way and to adopt such a policy formally.

## Roles, Responsibilities and Authorities

→ The responsibilities and accountabilities for implementation, operation, maintenance, monitoring and reporting of the SHE management system must be assigned by managers including clear communication and documentation.

→ Managers retain accountability for the functioning of the SHE management system.

→ Responsibilities, approvals and other authorities for roles in the SHE management system must be assigned, communicated and documented.

## Consultation and Participation of Workers

→ We must provide mechanisms, time, training and resources for our people to be involved and heard in the development, planning, implementation, performance evaluation and improvement of the SHE management system at Anglo American businesses and organisations. We must establish and maintain participation forums and opportunities.





# CONTEXT

We set the boundaries for a fit for purpose SHE management system by understanding where, how, with and for whom we operate and their SHE needs and expectations.

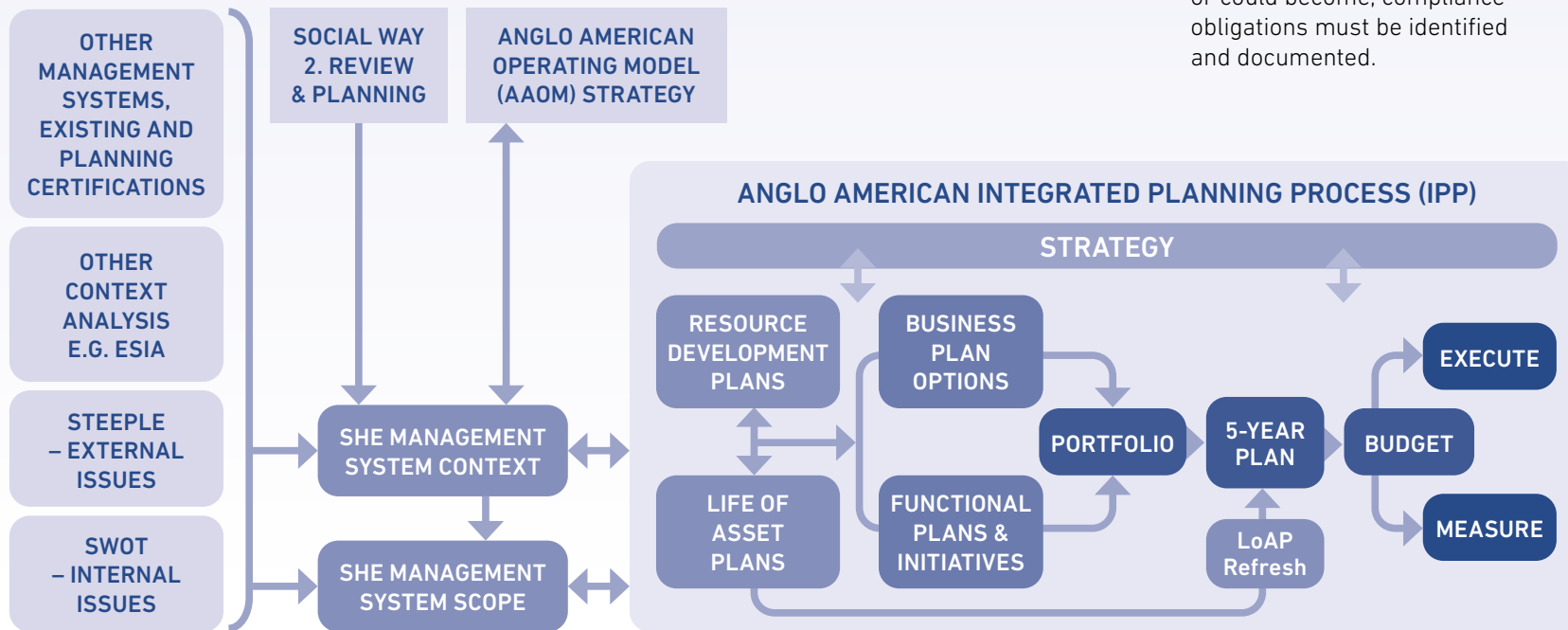
→ Anglo American businesses and operations must consider the specific context within which they operate, incorporating their Resource Development Plans (RDP's), Life of Asset Plans (LoAP's) / Life of Mine Plans (LoMP's), and including understanding the internal and external issues that determine the key needs of the SHE management system.

→ Business and operational plans must inform and be informed by the key needs of the SHE management system. The status and plans of implementation and activities related to the **Anglo American Operating Model (Operating Model), Operational Risk Management (ORM)** and other internal frameworks will also inform and be informed by the SHE management system.

→ The context for the SHE management system must include environmental conditions and people being affected by or capable of affecting the business or operation that have already been identified in the **Anglo American Social Way (Social Way)**.

→ Stakeholders and workers, their relevant needs and expectations and which of these needs and expectations are, or could become, compliance obligations must be identified and documented.

→ The scope of the SHE management system applied at each Anglo American business and operation must be documented so that the specific performance requirements expected and boundaries and interfaces to this are clear. These interfaces and boundaries include the intended integration points with the **Operating Model, ORM** and other existing or planned internal frameworks.





# PLANNING

We set clear plans and objectives and deliver our commitment to SHE through continuous improvement. We plan effective service strategies that allow us to meet our SHE compliance obligations, manage SHE risks and opportunities, prepare for and respond to emergency situations and take learnings from real and simulated events.

## Planning

- Planning results in service strategies that actively manage SHE risks and opportunities, meet SHE compliance obligations, prepare for and respond to emergency situations and take learnings from real and simulated events.
- Service strategies including service actions and trigger events must be documented and communicated.
- SHE management system processes identified through planning must be integrated into Isometrix. Processes must be either integrated or aligned, if integration is not practical, to existing processes established under the **Operating Model, Integrated Risk Management (IRM) framework** and the **Social Way** to prevent duplication of activities.

## Compliance obligations including legal requirements

### Compliance Obligations

- Anglo American businesses and operations must maintain a formal register (or registers) of compliance obligations including Anglo American Group compliance, stakeholder requirements and legal requirements relating to SHE.
- This register must be monitored and updated to reflect any changes and must be integrated with compliance obligations as determined by the **Social Way**, ICMM performance targets and other relevant external stakeholder reporting requirements to which businesses and operations subscribe.

### Compliance Activities

- Anglo American businesses and operations must establish, document, and maintain an audit and assurance programme, on a combined assurance basis, to ensure conformance with the requirements of their compliance obligations and of the SHE Way, with the focus on achievement of the objectives of the organisation.
- The programme must be based on clearly defined methods; be documented; and lead to appropriate activities.
- The audit and assurance programme must define audit and assurance criteria, scope, auditor requirements, methods, frequency of activities, reporting of results to management and the management of documented information pertaining to the programme.
- The audit and assurance programme must include internal reviews against the SHE Way and self-assessments against relevant **SSD Standards**. The internal reviews and self-assessments must be completed as per defined business expectations or requirements of the relevant standard, or more frequently if required to respond to specific issues such as incidents or requests from Group.



# PLANNING

## Environmental Aspects and Impacts, Safety and Health Hazards

→ Anglo American businesses and operations must determine and document the environmental aspects of their activities, products and services and their associated environmental impacts.

→ For safety and health, each Anglo American business or operation must establish, implement, and maintain hazard identification processes that are ongoing and proactive.

## Risks and opportunities

→ Anglo American businesses and operations must determine and assess their SHE-related risks and opportunities in consideration of impacts and consequences, existing controls and planned and expected changes.

→ All safety, health and environmental risk management processes must be completed in accordance with **Anglo American's Integrated Risk Management Policy** and **ORM Standard**.

## Objectives setting

→ Anglo American businesses and operations must establish, implement, maintain, and document SHE performance objectives at relevant levels and functions throughout the operation. These should inform and be informed by the overall objectives identified through business and operations planning, including 5-year plans in line with our in line with our FutureSmart Mining™ goals.

→ A plan to achieve SHE objectives must be prepared and monitored including targets and indicators mandated through the **Chief Executive Balance Scorecard Framework**.

Anglo American management systems including the Anglo American Operating Model, Social Way and SHE Way are all based on a PDCA cycle enabling key integration points and common processes to be identified.

Click the boxes to below to enlarge





# OPERATIONS

We integrate SHE requirements into all operational activities including those undertaken by contractors. We manage changes proactively. We plan and initiate effective responses to emergencies.

## Operational planning and control

- Work must be planned, approved, scheduled and properly resourced ahead of execution. Planning processes including work planning must be co-ordinated with the relevant parts of the SHE management system of other relevant organisations (inside and outside of Anglo American) and incorporated into operational scheduling.
- Planning processes that manage SHE risks and opportunities must integrate with **ORM Issue Based Risk Management, Task Based Risk Management** and **Continuous Risk Management**.
- Controls must be actively and proactively monitored. Where appropriate, controls should make use of real time mechanisms.
- SHE-related processes, risks and controls must be documented to demonstrate and measure implementation of controls and planned SHE actions. Existing Anglo American templates and systems must be leveraged where possible including **ORM guidelines and templates** and Isometrix.
- A hierarchy of control for the elimination of hazards and reduction of SHE risks must be applied.

## Contractor management

- Anglo American businesses and operations must ensure that contractors and business partners operate in accordance with the **Group SHE Policy** and develop a contractor management system embedded with the requirements of the SHE Way.
- SHE requirements for contractors shall be addressed with parties in an integrated manner as mandated in the **Group Contractor Performance Management Policy** and in accordance with the **Group Contractor Performance Management Procedure** to promote effective communication and monitoring with third parties.







# OPERATIONS

## Management of change

→ Anglo American businesses and operations must develop, implement, and maintain management of change processes in line with the **Management of Change Control Standard** for planned and unplanned changes that could impact SHE performance.

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

## Emergency preparedness and response

→ In line with the **Emergency Management Standard**, Anglo American businesses and operations must establish, develop, document, implement and test plans to prepare for and respond to the reasonably foreseeable emergency situations identified through **ORM** and the SHE risk assessment process included in Planning. The process should be defined to ensure business continuity.

→ Emergency preparedness assessments must be undertaken using methodologies appropriate to the nature and scale of the risk and the potential identified emergency and crisis situations. These must include potential risks to neighbours and the possible impact of external emergencies on the business or operation.

→ Emergency Plans must include appropriate processes and arrangements for post incident medical care, ensuring medical treatment is available for work-related injury or illness and, where necessary, a rehabilitation program based on medical advice.

All operations must ensure that all relevant personnel are trained, competent and familiar with the requirements of the emergency and crisis arrangements and of their respective roles and responsibilities.





# PERFORMANCE EVALUATION

We measure and evaluate our performance continuously and proactively. Our operations must continually measure and assess their SHE performance against the requirements of the SHE Way, SHE objectives and the SHE-related risks and opportunities.

This includes understanding the performance of our value chain where these are within the scope of our SHE management system.

## Monitoring, measurement, analysis and evaluation

→ Anglo American businesses and operations must prepare and implement a detailed SHE monitoring plan that will enable it to monitor, measure, analyse, evaluate and report on its SHE performance against its defined objectives, compliance obligations, Anglo American Group requirements and the SHE Way. These activities enable the Anglo American businesses and operations to determine their SHE performance and determine the effectiveness of the SHE management system.

→ SHE performance and determine the effectiveness of the SHE management system.

→ The SHE monitoring plan must clarify the scope, method, equipment requirements, criteria and frequency of monitoring and measurement, as well as analysis, performance evaluation and reporting on the SHE management system. This plan must be respectful of privacy and data protection considerations including appropriate safeguards.

→ Verification and monitoring of all SHE controls including their implementation, effectiveness and operation must be conducted to identify opportunities to improve

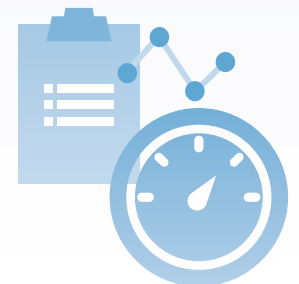
## Demonstration of Compliance

→ SHE performance and monitor compliance. 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. Where relevant Isometrix must be used for these purposes.

→ Anglo American businesses and operations must establish, implement, and maintain a process to evaluate the fulfilment of its compliance obligations and maintain knowledge and understanding of its compliance status.

→ This assists the business or operation in timeously identifying and addressing noncompliance ensuring the achievement of SHE Objectives as required; including shortcomings identified through the audit and assurance activities as well as shortcomings in adherence to the audit and assurance programme.

→ The evaluation of compliance status must be completed as per compliance planning and the audit and assurance programme; be based on clearly defined methods; be documented; and lead to appropriate actions.





# PERFORMANCE EVALUATION

## SHE Way Assurance

→ Assurance activities must follow the Three Lines Assurance Model, taking many forms, to provide information on the degree to which the SHE management system conforms to the Anglo American and International Standards requirements.

→ Assurance activities, including internal reviews and self-assessment activities, must be completed as per compliance planning and the established assurance programme and have documented information retained as evidence of programme implementation.

→ The businesses and operations management systems will be subject to regular third party audits, such as ISO certification and Group level assurance to ensure alignment with the SHE Way.

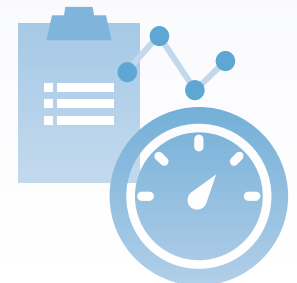
**Note: Outputs from third party audit activities (ISO, IRMA etc) should become inputs into the management system improvement activities.**

## Management review

→ Managers at Anglo American businesses and operations must periodically (on an annual basis at a minimum) review the SHE management system to ensure its continuing suitability, adequacy, and effectiveness.

→ All the elements of the SHE Management System serve as inputs into the Management Review process and through their analysis and evaluation, management is able to make decisions relating to resourcing, required actions, strategic direction, and improvement opportunities.

→ 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. These activities include evaluating and realigning business and operational five year plans.





# IMPROVEMENT

We learn from what goes right, what goes wrong and what can be better. We investigate, plan and introduce improvements to deliver our FutureSmart Mining™ plan.

## Incidents

→ Anglo American businesses and operation must establish, implement, and maintain formal systems, in line with legal, regulatory and internal Group requirements, that include reporting, investigating and taking action, to determine and manage incidents, the aim of such systems being to prevent recurrence. When events occur, there must be a timely reaction.

→ For Anglo American, incident management must be supported by the **Learning from Incidents (LFI) process**. The process must ensure that SHE incidents are reported, recorded, analysed, investigated, contributing factors are identified, risk profiles and control strategies are updated, learnings are shared and corrective and improvement actions are implemented across the Group. This enables the creation of a sustainable corporate memory and effective knowledge management.

## Non-conformities

→ Similarly, nonconformities must be pro-actively managed to ensure reporting, investigating, and corrective action processes are implemented and maintained, and that corrective actions are appropriate to the significance of the nonconformities encountered.

## Corrective and Improvement actions

→ Action management processes must ensure quality actions that have longevity and are effective beyond the current concern.

→ Actions management processes must include the assignment, approval and verification of actions in a timely manner.

→ Actions must be proactively managed and closed appropriately.

## Continual Improvement

→ In line with the **Anglo American Purpose** and **Burning Ambition**, businesses and operations must incorporate continual improvement activities into annual objectives setting and 5 year planning processes that drive value in SHE and overall performance.

→ Anglo American businesses and operations shall establish, implement, and maintain processes to determine opportunities for continually improving the suitability, adequacy, and effectiveness of the SHE management system, implementing necessary actions to achieve these intended outcomes and enhance SHE performance.

→ Promotion of worker participation in continual improvement and promoting a culture that supports the SHE management system is supported by the **SHE Policy** and Anglo American leadership. All activities must be documented to evidence improvements and results must be communicated where appropriate.





# SUPPORT

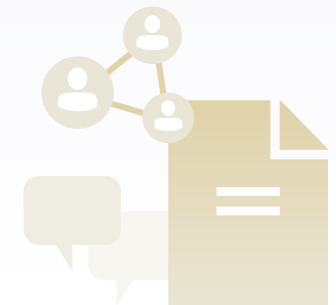
We support the SHE Way with the right people at the right place doing the right work in the right way to drive SHE excellence. We engage with and include everyone in our SHE journey, expecting everyone to actively participate and contribute.

## Resources

- Anglo American businesses and operations must identify and provide the resources needed for the establishment, implementation, maintenance, and continual improvement of the SHE management system.
- This includes confirming and communicating the responsibilities and accountabilities for implementation, operation, maintenance and monitoring of the SHE management system to employees, contractors, and any other relevant parties.

## Competence

- Anglo American businesses and operations must have formal systems in place to ensure that their personnel and Contractors and business partners are competent and capable to perform their activities in alignment with the SHE Way, the **Capability Framework**, the **Accountability Framework**, and compliance obligations to meet Anglo American's SHE intended outcomes.
- Required competencies and capabilities must be determined, clearly defined, included as part of recruitment, and be based on appropriate education, training and experience.
- Training and development programmes must be delivered effectively and appropriately, be reviewed for effectiveness, and have the requisite documented information retained to demonstrate competence.
- Programmes must be founded on continual improvement and building the desired workplace and working cultures, whilst developing the 5 elements of capability (Mental Processing Ability, Knowledge, Technical skills, Social Process Skills & Application) to the levels of work.
- All personnel and contractors and business partners must understand ethical, data protection and business integrity considerations of their activities and their responsibilities in this regard.





# SUPPORT

## Internal communication and awareness

→ Defined processes must be developed and implemented to ensure the effective communication and awareness of matters relating to SHE across all levels and functions of the organisation. Internal communication processes must enable workers to contribute to the overall management system performance as well as continual improvement.

→ Everyone must know what the **SHE Policy**, SHE Way and SHE Objectives are; their obligation and right to participate in and contribute effectively to the SHE management system; the repercussions for failing to conform to SHE requirements; and their rights and protections under the SHE management system.

## External communication

→ Defined processes must be developed and implemented to communicate externally with stakeholders on information relevant to the SHE management system and the fulfilment 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 project's Stakeholder Engagement Plan as per the **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.

## Documented Information

→ In line with Group document management guidance, Anglo American businesses and operations must establish, document, implement and maintain systems to control the documented information necessary to support the effectiveness of the SHE management system and fulfilment of compliance obligations.

→ Documented evidence must be available to demonstrate SHE management system implementation and adequacy. This may include both internal and externally sourced information.

→ The document management system must ensure worker participation, stakeholder engagement and management of change processes through all stages of document approval. It must respect workers rights to view personal information.

→ The SHE management system must align and integrate with the operation's document management approach and ensure that documented information is created, updated, protected, controlled, stored, and archived appropriately and in accordance with the SHE Way Specification and the Group document management guidance. Isometrix and similar platforms support the requirements of documented information.

## Engagement and Participation

→ Anglo American businesses and operations must establish, implement, and maintain processes for internal and external communications and awareness programmes relevant to the SHE management system.

