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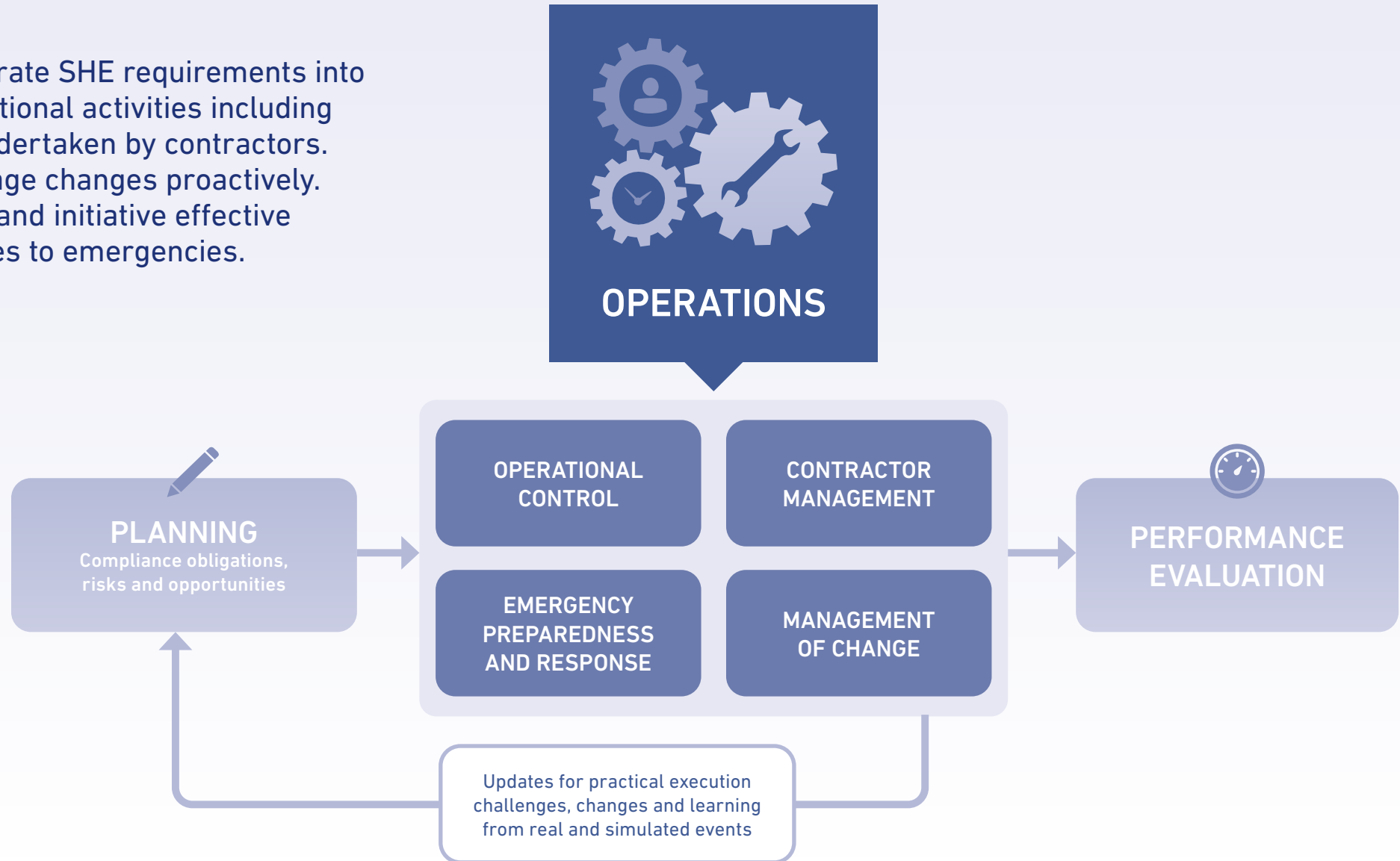
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# OPERATIONS

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



# OPERATIONAL CONTROL



## Why?

Implementation of the SHE management system and integration into day to day activities and operations is where we deliver on our SHE commitments. Whilst operations can be dynamic in nature, our pillars of value: safety, environment, social, people, production, cost/margin and returns/financial remain constant. We achieve consistency through establishing and maintaining an effective control environment.

Effective controls enable us to manage the identified risks and opportunities and also monitor, report and review performance and operational decision making. It is important that where we find controls aren't working effectively that we make improvements.



## How?

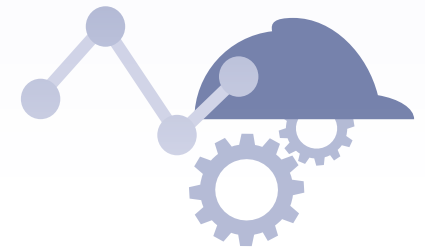
→ The identification, design and implementation of controls must be undertaken in accordance with the four-step ORM four-step approach and the **ORM Standard and Specifications**. This includes implementation and monitoring of critical controls as per the **Fatal Risk Control Program** and to prevent Priority Unwanted Events (PUEs).

→ Controls design must be tailored to all levels of the organisation cascading from Anglo American business and operations management to on-site works and individual teams. Controls design must include worker participation and consultation. It must also take into account specific adaptations and constraints whilst ensuring the effectiveness of the control.

→ Risk and control owners must be assigned to all SHE controls within Isometrix. They are accountable for the verification that the control is being implemented and operated as designed and that it manages the risk or opportunity in the manner intended.

→ Approved measures to actively manage SHE risks and opportunities and meet SHE compliance obligations must be integrated into the Operating Master Schedule (OMS) and work management processes. This includes but is not exclusive to critical controls. It will also include additional controls required for vulnerable or susceptible persons or environments.

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# OPERATIONAL CONTROL



## How?

→ The Anglo American control hierarchy is elimination, substitution, engineering, separation, administrative and PPE or physical environmental protection controls. Once designed, controls must be implemented, monitored, verified and continually improved in line with the **ORM Standard and Specifications**.

→ Implementation of controls must include communication and documentation of these controls to embed them into processes such as:

- Elimination or substitution recorded within the relevant governance documents for the project in the form of a policy document or equivalent

- Engineering and separation controls are captured in design, operations and maintenance documentation with clear indication made on the further required layers of control or action in case of failure of the control

- Administrative or behavioural controls including but not exclusive to policies, disciplinary matters, site rules and instructions, procurement guidelines, supervision. campaigns and initiatives are widely communicated, trained and verified as understood by those operating them including third parties

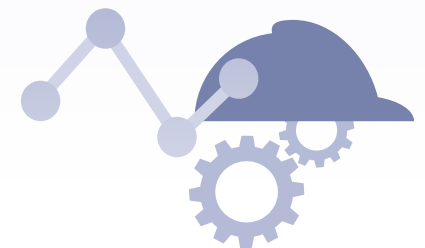
- In the very rare case where PPE or physical environmental protection controls are the main type of control used, the exploration of other options must be documented

and approved; and controls must be accompanied by a training and awareness programme on the control and the risks it is managing

- Task level SHE controls such as administrative and PPE controls and reliance on engineering or separation controls must be included in Work Execution Documents.

→ Controls for low frequency events or long-term risks, such as many long-term health and environment risks may include monitoring of trigger actions and escalation points or low frequency periodic activities. These must be built into schedules and activities even if they are infrequent in nature.

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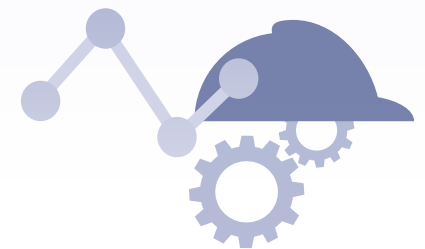


# OPERATIONAL CONTROL



## How?

- For all PUEs (risk assessed as level 4 or 5 as per **Anglo American's ORM matrix**) related to processes, products, services and activities, control strategies are defined as part of the Issue Based Risk Management. Control strategies must manage SHE risks and not increase or introduce additional SHE risks. Where additional risks are unavoidable, additional controls and measures to mitigate and counter these must be deployed to reduce the SHE risk on an 'as low as reasonably practicable' (ALARP) basis and in all cases lower than the original risk before the control was applied.
- Use of instrumentation, equipment and immediate feedback must be used where feasible as real-time controls or real-time monitoring for SHE risks and opportunities. For automation and feedback loops to be relied upon they must be regularly maintained, tested and verified.
- 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. This includes but it is not limited to conducting regular PTOs ensuring that outcomes of these activities are captured; and corrective actions implemented. It is recommended that such details are recorded in Isometrix for increased ease of tracking.
- SHE 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 must consider 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 and whilst they are on Anglo American sites and locations. Worker participation and consultation in controls design and implementation must be enabled to enable success.



# CONTRACTOR MANAGEMENT



## Why?

Contractors undertake key roles and activities in our Anglo American businesses and operations and are critical to meeting our SHE commitments. To maintain efficiency and clarify our expectations, we must communicate our requirements effectively and monitor SHE compliance by third parties taking action where necessary.

We seek to create mutually beneficial relationships with our customers, contractors, suppliers and other business partners, built on safe, fair and ethical practices.



## How?

→ In line with **Contractor Performance Management Policy and Procedures**, SHE risks and opportunities and the effective management of these must be built into the full contractor management lifecycle including Define and Plan, Sourcing and Contracting, Pre-commencement, Contract Execution and Performance Management and Close Out.

→ This includes:

- Sharing information with regards to compliance obligations, SHE risks and opportunities associated with the contracted work with the Contractors formally
- Including compliance obligations and critical control responsibilities within contract documentation
- Maintaining the same SHE standard for contracted activities as for internal Anglo American activities.

→ Roles and responsibilities for and of contractors at Anglo American sites and locations must be clearly identified and documented with notifications of poor and non-compliance performance escalated and acted upon promptly.

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# CONTRACTOR MANAGEMENT



How?

→ Additional SHE risks and opportunities resulting from the use of contractors must be evaluated and appropriate controls designed and implemented. SHE critical controls that are significantly or wholly reliant on contractor activities and performance must be verified to confirm that they are in place and effective and updated in Isometrix. This includes contractor SHE reporting responsibilities such as emissions, incidents and accidents, waste and water management.

→ For new SHE compliance obligations and SHE risks and opportunities such as environmental concerns and health notifications, proactive communication with third parties must be activated to inform and advise them promptly and to engage in collaborative identification and implementation of solutions to address the requirements. Contractors will be similarly expected to notify Anglo American of any emerging SHE issues from their activities and operations, along with actions undertaken to mitigate and manage these issues; and must be actively encouraged to do so.





# MANAGEMENT OF CHANGE



## Why?

Anglo American business and operations work in a dynamic environment and are continuously evolving and this mean introducing change to initial assumptions and plans. The Management of Change process enhances the SHE management system by planning for the introduction of new safety and health hazards and environmental aspects and impacts so that compliance obligations continue to be met, risks and opportunities managed and adequate emergency response is in place.

Changes which require Management of Change can occur throughout business and operational activities and at all levels of the organisation, they can be difficult to identify but if left unidentified, they are likely to be a major cause of multiple fatality incidents due to lack of control over new risks introduced. Prompt and systematic identification of changes through a strong process with relevant responsibilities assigned enable new risks and opportunities to be controlled promptly and effectively before issues occur.



## How?

→ A Management of Change process must be implemented in line with the **Management of Change Standard** that takes into account the different complexities and types of change. This includes Planning and Design, Implementation and Management and Performance Monitoring of Management of Change.

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# MANAGEMENT OF CHANGE



## How?

→ In line with the **Management of Change Standard**, Management of an identified Change requires at a minimum a review of the relevant risk and opportunity assessment performed. In many cases, this will result in identification of new safety and health hazards, environmental aspects and impacts and compliance obligations so new or changes controls or measures need to be put into place.

→ The Management of Change must be documented using the tool in Isometrix. If no amendments are deemed required after Management of Change review and re-assessment, this result must still be formally documented and approved.

→ Appropriate approvals must be obtained for updates made to SHE documents resulting from change before the change is made, this may include but is not exclusive to: scope of the management system, hazard inventory, environmental aspects and impacts register, compliance register, WRAC or other baseline assessment additions, Risk and Critical Control Register (RCCR), Risk Control Management Plan, WEDs, SOPs, performance measurements, guidelines, communication materials, stakeholder engagement plans and materials etc.

→ Management of Change outputs must be communicated and implemented including replacement of previous instructions, signs or guidance that are no longer required. This includes communication to workers, contractors and relevant stakeholders.



# EMERGENCY PREPAREDNESS AND RESPONSES



## Why?

Anglo American businesses and operations are highly dynamic and function in dynamic environments. Where SHE related incidents and accidents do occur despite our planning and actions taken, we need to be ready to mitigate impacts swiftly and in a co-ordinated manner to protect lives, health and the environment.

In all cases, we learn from all previous events (real or simulated) and plan our emergency response considering the context in which we operate, immediate and longer term response requirements, our workers and stakeholders and effective communication internally and externally. Adaptive, informed upfront planning enables us to respond quickly, effectively and in a co-ordinated manner to reduce safety, health and environmental impacts from emergencies.



## How?

→ Anglo American Business and Operations must implement the processes and activities required as per the **Emergency Management Standard and the Technical Specification for Emergency Plans, Training and Simulation**. This includes Planning and Design, Implementation and Management and Performance Monitoring for emergency preparedness and response.

→ Emergency preparedness and response processes and emergency response plans prepared in accordance with the Emergency Management Standard must leverage the activities of the SHE Way (**Context and Planning specification chapters**) including prevention or mitigation of identified environmental impacts, safety and health emergencies, compliance requirements and stakeholder needs and expectations. Appropriate risk and opportunity management must also be applied to additional SHE risks generated by the proposed response itself to reduce such effects as far as possible, this includes considerations of products and materials used and their potential long-term environmental impacts.

→ 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. Mental health and wellness impacts in particular, must be considered and addressed including the need for employee assistance programs or similar in the aftermath of an emergency.

→ Drills and simulations must be undertaken at the frequency set out in the Emergency Response Training and Simulation Specification and documented as per the requirements of that Specification.

# EMERGENCY PREPAREDNESS AND RESPONSES



## How?

→ Contractors, visitors, relevant community stakeholders, neighbours and regulatory agencies must be informed of the requirements of the emergency situation arrangements and of their respective duties and responsibilities in the situation. **+ MEMORANDUM OF UNDERSTANDING AGREEMENTS** must be made with organisations critical to the response that clarify the response understanding and the resources, information, communication and co-ordination to be provided by both parties.

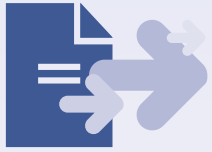
→ Workers must be advised on the emergency response processes and plans and must participate in the design of the emergency response with the aim of increasing its applicability and fitness for purpose in practice. This may be undertaken through the SHE Representative Committee or similar forum.

→ The defined emergency processes, performance and planned response actions must be reviewed (at least) annually to ensure they remain relevant and appropriate and to capture any improvements required. Feedback processes must be in place so that post emergency events and incidents including near misses, risk and opportunity assessments, emergency response planning is updated for improvements and new information.

→ All SHE practitioners, occupational health practitioners and responsible operational people shall have access to up-to-date Safety Data Sheets (SDSs) and HAZMAT documentation and relevant information shall be communicated to contractors, visitors, emergency response services, government authorities, affected stakeholders and, as appropriate, the local community relating to emergency situations and responses. This communication is not just during or post an event but also with regards planned response.

→ Documentation must be maintained and retained documented information on the processes and plans for responding to potential emergency situations, to the extent necessary to have confidence that the processes are carried out as planned and considering appropriate location for such documentation in the case of an emergency.

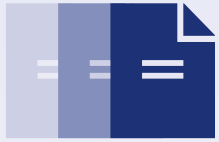




## WHAT IS THE OUTPUT OF IMPROVEMENT?

Click between the SHE  
Way sub-element tabs





## REFERENCE TO STANDARDS

In undertaking the activities in this section, the following internal and external standards are applicable (this is not an exhaustive list).

Click between the tabs:  
**INT** = Internal References and Standards  
**EXT** = External Standards



# HOW DOES IMPROVEMENT FIT INTO THE REST OF THE SHE WAY?

