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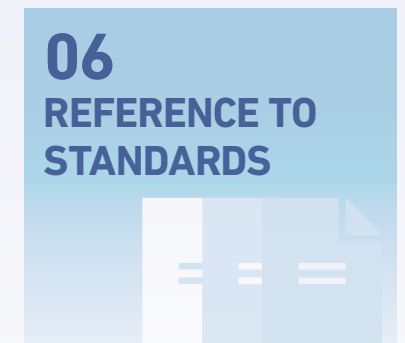
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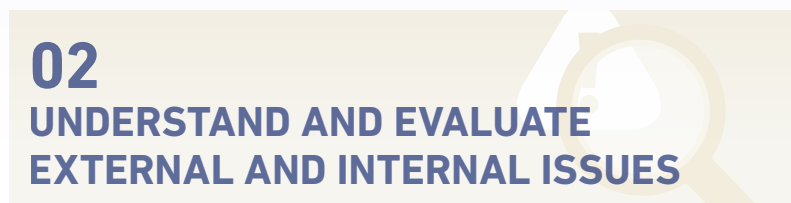
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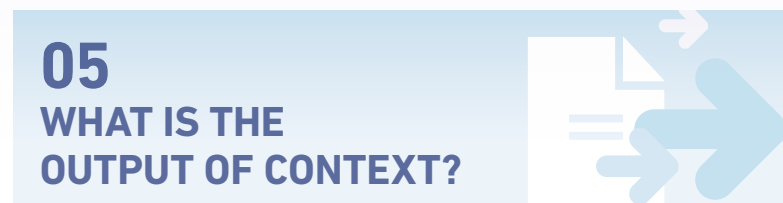
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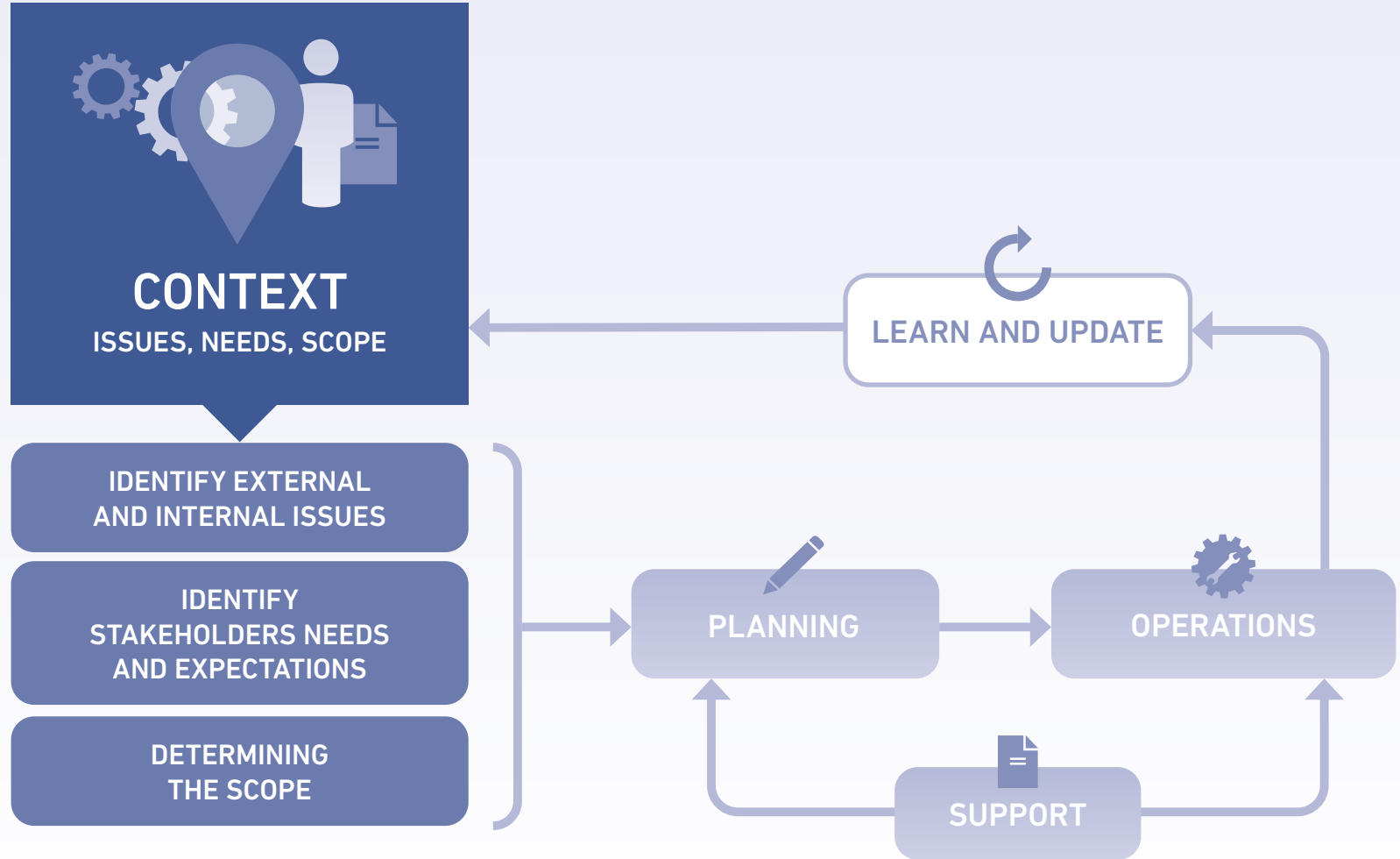


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# CONTEXT

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.



# UNDERSTAND AND EVALUATE EXTERNAL AND INTERNAL ISSUES



## Why?

A broad understanding of the context of our businesses, operations and the wider environment in which they operate, including individual challenges each operation faces helps to avoid gaps in the SHE management system that is designed and implemented. Getting this right from the start is critical for successful planning and ultimately, implementation of the SHE management into our everyday operations.

The outputs of this exercise will vary by Anglo American business and operation due to the diversity of our operations. Understanding and exploring the context reveals both mandatory / legal requirements and requirements to which we subscribe or are committed to.

In addition, it is important to understand the baseline across a number of functional parameters (e.g. environmental, waste etc) so risks can be understood and mitigated informing the plans going forward. Mandatory requirements such as those incorporated into the local laws, regulations and contracts, as well as other requirements that may be agreed to or adopted on a voluntary basis, including requirements that are implied from the definition of the scope of the SHE management system such as who and what we expect it to apply to and protect.

Once requirements are adopted, they **must** be documented and incorporated in the plans captured so that they are addressed.



## How?

→ There is no single approach to understanding external and internal issues. Anglo American businesses and operations should use an approach that is appropriate to their scope, nature and scale, and is suitable in terms of detail, complexity, time, cost and availability of reliable data.

→ The analysis is often conducted as a brain-storming exercise led by management with participation from operations, SHE practitioners, worker representatives, knowledgeable persons from various parts of the organisation, stakeholder representatives and peer Anglo American staff with specialist input solicited from other technical experts as required. The team formed should be able to discuss and capture external and internal issues from a wide

perspective and determine which are relevant for the SHE management system.

→ Where a similar Context setting exercise has already been performed for another function e.g. Social Context identification, the outputs of this exercise should be leveraged and built upon, ensuring that all aspects of SHE context have been considered. Alternatively, this exercise could be done in conjunction with other functions to limit duplication of exercises achieving the same outcome within the organisation.

→ The outputs of any context identification exercise should be documented with clearly highlighted impacts, actions and next steps to inform the Planning phase of the process, setting out the participants of the workshop(s), methodology, outputs and decisions.

→ When considering the external issues, this analysis can be undertaken using techniques such as **+ STEEPLE ANALYSIS** (Social, Technological, Economic, Environmental, Political, Legal, Ethical) with participation of cross-functional stakeholders. The internal analysis of the organisation can be developed using a **+ SWOT** or equivalent technique.

→ When considering the factors within STEEPLE, review constraints that may prevent us from achieving the goals of the Future Mining programme as these constraints will be the external issues that need to be addressed.

# UNDERSTAND AND EVALUATE EXTERNAL AND INTERNAL ISSUES



How?

→ The context identification exercise may inform the scope of an **Environmental and Social Impact Assessment (ESIA)** which should be completed prior to the commencement of any sitedisturbing activities associated with the project, if applicable. Clarifying the context is a key initial step for any ESIA.

→ The context of the SHE management system will always include the laws and regulations of the jurisdictions in which we operate. In situations where there is a discrepancy between domestic legislation and the SHE Way, we uphold the higher standard, while ensuring compliance with law. Any such instances should be noted in the Legal and Political (if applicable) sections of STEEPLE analysis.

→ The context analysis should be updated at least annually or when significant changes occur e.g. new processing plant, changes in regulation etc. Management review should be the forum for this review.

→ The Context identification exercise should be documented in a report or [+ CONTEXT SUMMARY DOCUMENT](#) that confirms that a wide consideration has been made to arrive at the issues and factors pertinent to the SHE management system and corresponding conclusions with regards SHE management system boundaries, inclusions and exclusions in the scope.

→ SHE context activities especially regarding compliance, should be managed in and integrated with the same operating master schedule,

process or system that allows for integration with related exercises such as those for the **Social Way** or LoMP, RDP, **AAOM**, LoAP planning and context setting to prevent overlaps or duplication of efforts and increase efficiency. This could result in a single integrated exercise and output, supporting the development of one plan for the site.

→ The assessment results of the environmental and social risks and opportunities of new projects as well as of significant changes to existing operations must be conducted in consultation with interested and affected stakeholders. The assessment results must be publicly disclosed in accordance with the [+ ENGAGEMENT AND PARTICIPATION PLAN](#).



# IDENTIFY AND EVALUATE STAKEHOLDERS NEEDS AND EXPECTATIONS



## Why?

By understanding the context and listening to stakeholders we stay ahead of evolving trends and provide the solutions to societal expectations around sustainable development.

By clarifying stakeholder needs upfront and making sure that they are incorporated into our SHE management systems, we can create enduring value for all stakeholders and ensure we meet and understand all of our compliance obligations.



## How?

→ Undertake a stakeholder identification process aligned or integrated to the **Social Way** stakeholder exercise that lists:

- 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 are to be adopted as compliance obligations
- Compliance obligations stemming from stakeholder SHE related needs and expectations.

→ Engage workers via Workers Representation Forum and SHE Committee to collect input on the relevant stakeholders and impact.

→ The potential impact on stakeholders should be assessed e.g. high/medium/low as it may be relevant in the context of operations.

→ All relevant stakeholders and impact assessment must be documented in a [+ STAKEHOLDERS REGISTER](#) or a similar document that aligns to or preferably is integrated with the parallel exercise undertaken for the **Social Way** and **ESIA**.



# DETERMINING THE SCOPE



## Why?

Documenting and agreeing the scope of the SHE management system highlights what is intended to be within and outside of the activities, processes, procedures and documents within it.

This helps to clarify key reporting points and respective roles and responsibilities of entities, organisations and functions and may identify potential gaps and overlaps between Anglo American management systems and those of contractors and suppliers, so that these can be tackled and aligned.

The scope of SHE management system does not only include management of SHE requirement and activities but also the continual improvement and ongoing learning and development of SHE.

The success of a SHE management system depends on commitment from all levels and functions of the organisations and hence the governance arrangements, levels of applicable authority and the extent of cross functional interactions must all be covered in the scope.



## How?

→ Conduct a session (physically or remotely) to confirm what is intended to be within and outside of the SHE management systems with appropriate representation from management, SHE disciplines, worker representatives, knowledgeable persons from various parts of the organisation, stakeholder representatives and peer Anglo American staff.

→ Document the results, as a minimum covering the following across the phases of the lifecycle:

- organisational, functional and physical boundaries, including any physical assets, contractors, project and co-located activities on Anglo operated sites
- implications of the context, internal and external issues from the exercise conducted

- stakeholder groups
- standards applied, adopted or implied
- key work activities included in the scope
- dependencies and interdependencies with other management systems (internal and external).

→ Determine the control or influence that we can exert over these areas.

→ Identify any dependencies on activities or stakeholders that are not within the spheres of control or influence by the Anglo-American business or operation e.g. integration points, reliance on other Anglo American or partners' management systems, frameworks and processes. Identify the impacts and how they will be managed.

→ Document the scoping exercise the Scope section of the [+ CONTEXT SUMMARY DOCUMENT](#) with approval from management.

→ Share and communicate the documented Scope with the key stakeholders on site to inform Operational Planning. Engagement of SHE Committee with Workers representation will be instrumental in ensuring that the result of the Scoping exercise are known and well understood.

→ If the organisation changes its sphere of control or influence, expands its operations, acquires more property, or divests business lines or property, the scope should be reconsidered, along with other changes likely to affect the SHE management system.

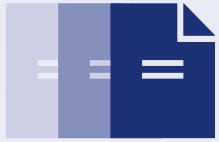


# WHAT IS THE OUTPUT OF CONTEXT?

Click between the SHE Way sub-element tabs







# REFERENCE TO STANDARDS

## SHE Way: CONTEXT

### External Standards

**ISO 45001** Section 4 Context

**ISO 14001** Section 4 Context

**IRMA** Chapter 1.2 Community and Stakeholder Engagement

**IRMA** Chapter 3.2.1 Health and Safety Management System

**ICMM** Principle 3 Respect human rights and the interest, cultures, customs and values of employees and communities affected by our activities (specifically 3.7)

**ICMM** Principle 4 Implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks (specifically 4.1 Assessment)

**ICMM** Principle 10 Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner. Effectively report and independently verify progress and performance (specifically 10.1 Identification)

**IFC** Environmental and Social Sustainability Performance Standard 1 Assessment and management of environmental and social risks and impacts (1.05-1.17, 1.25-1.33, 2.23)

**IFC** Environmental and Social Sustainability Performance Standard 2.23 Occupational Health and Safety

### Internal SHE Way References and Standards

Social Way Toolkit: 2 Review and Planning, 3C Social and Human Rights Impact and Risk Analysis (SHIRA), 3A Stakeholder Engagement, 4C Community Health and Safety Management

Anglo American Operating Model: Set Business Expectations, Modify or Adapt the Business

Operational Risk Management: 3.3. Communication and Consultation Specification C

Government Relations Way

Rehabilitation Strategy and Group Guideline for Rehabilitation

Mine Closure Standard

Biodiversity Standard

Water Management Standard

Mineral Residue Facilities and Water Management Technical Standard and Specifications

FutureSmart Mining™ program

Sustainable Mining Plan and Global Stretch Goals

Investment Development Model Guideline

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

