



# Group Policy: Safety, Health and Environment (SHE)

## Overview: Who we are

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Safety, Integrity, Care and Respect, Innovation, Collaboration and Accountability are the core Values for Anglo American. In line with our purpose to re-imagine mining to improve people's lives and essential to delivery of our Sustainability Strategy, we recognise our responsibility to proactively understand and minimise the impact of our businesses and seek to create and maintain safe, healthy and environmentally sustainable working environments. We are committed to conducting our business in compliance with all applicable laws and regulations of each country in which we do business.

Our management of Safety, Health and Environment (SHE) systematic, sustainable, scalable and integrated into the whole lifecycle of our activities in operations, projects, exploration and supporting functions; is inclusive of how we work with our contractors, business partners and suppliers; and includes full integration with the Anglo American Operating Model.

For Anglo American to achieve excellence in SHE, we apply the following principles:

- **Zero Mindset** – We shall apply the hierarchy of controls to eliminate or reduce SHE exposure risks and remediate, offset and rehabilitate the SHE impacts arising from our activities, products and services.
- **No Repeats** – Necessary steps will be taken to reactively and proactively learn from SHE incidents and insights from verification, assurance and SHE performance monitoring and to prevent their reoccurrence.
- **Simple Non-negotiable Standards** – Simple non-negotiable Group standards and procedures shall be applied throughout the Group as a minimum requirement.

We comply with the SHE Way Framework and *Group Standards*, Policies and Procedures to support implementation of this Policy.

*Italics are used to indicate words that are defined or explained for the purpose of this Policy (refer to the section on Key Terms).*

## Our Principles: How we prioritise Safety, Health and the Environment

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### Management of SHE

To uphold our SHE principles of a Zero Mindset, No Repeats and Simple Non-negotiable Standards, we must apply the following.

#### Leadership

Business Leaders, General Managers, Functional Managers and Supervisors must ensure that trust and transparency is demonstrated in the work environment, so that people can live our values while feeling psychologically safe. Leaders proactively listen and follow up on SHE concerns raised by the workforce.

Everyone at Anglo American demonstrates excellence in SHE and are accountable for their behaviours and in holding each other to account. We uphold our principles and

apply our Leadership Framework to ensure SHE values and priorities are central and integrated into our activities, our performance targets and objectives. *Everyone* is supported in having the courage to speak up and stop work if conditions are felt to be unsafe to continue, or if they risk harm to the environment, communities, or society.

## Integration

We integrate SHE management into all operational activities, including through the Anglo American Operating Model. By doing so, we integrate our commitments on safety, physical health and well-being, responsible management of biodiversity, and minimising environmental impact into how we work.

Business Leaders, General Managers, Functional Managers and Supervisors must ensure our SHE Way Framework is integrated into all operational activities. All teams (including contractors and suppliers) must know the purpose and requirements of *Group Standards* and procedures they have to follow, and ensure they are trained, competent and authorised for the activities they undertake.

## Implementation

We develop and embed long-term and sustainable SHE strategies in a lifecycle approach, including Integrated Permitting and closure of operations, to deliver on our *Critical Foundations* and the Sustainability Strategy. We apply the SHE Way Framework and associated Technical Standards in our management of our operations. We identify, assess, prioritise, manage, and reduce or eliminate SHE-related risks.

Business Leaders, General Managers, Functional Managers and Supervisors must ensure the right resources to manage SHE are in place. SHE objectives must be set, and progress must be monitored to ensure objectives are being achieved, and that this Policy is being implemented and complied with.

Everyone at Anglo American must actively and continuously identify, assess and appropriately manage SHE risks and opportunities. Controls and actions to manage SHE must be identified, prioritised and implemented.

## Governance and Compliance

We fully understand and monitor all SHE compliance commitments and conditions. We ensure alignment, and comply, with the laws and regulations of all jurisdictions in which we operate.

Business Leaders, General Managers, Functional Managers and Supervisors must ensure there is rigorous governance plan to act upon, monitor and proactively report on all compliance obligations and conditions.

Everyone at Anglo American must know the specific performance requirements that are expected of them. All concerns about SHE compliance must be raised and discussed with a manager or the SHE team.

## Continuous Improvement

We measure and analyse performance to improve our systems and management of SHE, adding value and contributing to business improvement. We ensure we have a fully

engaged workforce everywhere we work, which includes contractors and suppliers, to identify and implement SHE-related opportunities and areas to improve, ensuring we are creating a net positive legacy in the areas where we operate.

Business Leaders, General Managers, Functional Managers and Supervisors must ensure forums for workforce consultation, participation and engagement (including with workforce representatives, where relevant) are in place. We must act on approved improvement opportunities.

Everyone who works for Anglo American must collaboratively monitor, analyse, report, share and learn from “what goes right” with our management of SHE as well as “what goes wrong” from incidents and non-conformances.

## Monitoring and reporting

### Reporting and Analysis

Local Business Leaders, General Managers, Functional Managers and Operations management are required to monitor, report and analyse performance, and implement agreed improvement actions for SHE in their area of responsibility.

Business and Functional SHE managers provide reporting, measurement, analysis and suggestions to management teams for improvement on a predefined frequency.

The Group Technical and Operations Director and Group Head of SHE are responsible for informing the Chief Executive and the Anglo American Board of Directors of our Group SHE performance globally in order to ensure our management of SHE is in line with our expectations.

### Assurance

The Anglo American Risk, Assurance and Governance (RAG) Policy ensures that all roles work together to collectively contribute to SHE performance. Local Business Leaders, General Managers and Functional Managers, are required to ensure an effective “Three Lines” model is implemented in accordance with the RAG Policy. Effective assurance and audits ensure our commitments, both internal and external, as well as our obligations are delivered at every level of the Company. As specified in the RAG Policy and where relevant and required by a Business’ and Operations’ external commitments, external assurance services may be commissioned as they relate to relevant identified SHE risks.

## Further guidance, breaches and reporting

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This Policy shall be available and communicated across the organisation and shall be available to interested external parties.

### Further guidance

This Policy is supported by the SHE Way, mandatory standards and procedures, training and other resources, available through our intranet sites.

## Consequences of breach

People are held accountable for their behaviour when working for or on behalf of Anglo American, and appropriate action is taken where behaviour is inconsistent with the Code of Conduct, Group standards, policies and procedures and related documentation. Consequences depend on the circumstances, will be as per our Accountability Framework and subject to applicable laws.

## Key terms

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Defined for the purposes of this Policy.

- **Anglo American Operating Model**

The Anglo American Operating Model is our structured approach for how we set targets, plan, execute and improve our work.

- **Compliance Obligations**

Legal and other requirements that an organisation has to comply with and other requirements that an organisation 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.

- **Critical Foundations**

The common and minimum requirements for each of our operations and our business.

- Leadership and Culture
- Zero Harm
- Human Rights
- Inclusion and Diversity
- Group Standards and Processes
- Compliance with Legal Requirements

- **Everyone**

Those responsible for implementation of the SHE Policy, and those that are exposed to health, safety and environmental risks from work undertaken by and on behalf of Anglo American, that is employees and contractors (in line with the Responsible Sourcing Standard and the Contractor Performance Management Policy and Procedure). Those exposed to risks include internal and external stakeholders and will vary reflecting the nature of specific risks, but as a minimum includes employees, contractors, and community members living in proximity to our activities.

- **Group Standards**

Define the minimum mandatory requirements for managing consequences 4 and 5 (Refer Anglo American IRM Risk Matrix) for Technical, SHE risks, associated with site, operational and project activities.

- **Management System**

A management system is a set of interrelated or interacting elements of an organisation to establish policies and processes to achieve set objectives.

- **Risks and Opportunities**

Potential adverse effects (threats) and potential beneficial effects (opportunities).

- **The SHE Way Framework**

The SHE Way Framework is the Anglo American Group Standard for the Safety, Health and Environmental management system that describes our systematic approach to the management of SHE- related risks and opportunities and how this integrates with our business processes. It includes the SHE Way Standard, Guidelines, Procedures and SHE Way Toolkit.

## About the Policy

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### Scope and application

This is a Group Policy that applies to Anglo American globally, unless any aspect of the Policy is not permitted by local law or regulation. Our *people* have a duty to uphold and comply with the laws of the countries and jurisdictions in which they operate.

This Policy sets out Anglo American's position in respect of areas within its scope. It is not, and is not intended to be, comprehensive and should not be regarded as legal advice. Appropriate guidance on this Policy, relevant laws and their application to any particular situation should always be sought.

This Policy applies to all directors, employees, contractors and representatives of entities in which Anglo American plc has a direct or indirect interest of greater than 50% unless notified to the contrary, and/or unless any aspect of the Policy is not permitted by local law or regulation.

### Responsibility

In this Policy, and any related procedures or standards, references to "Anglo American", the "Anglo American Group", the "Group", "we", "us", and "our" are to refer to either Anglo American plc and its subsidiaries and/or those who work for them generally, or where it is not necessary to refer to a particular entity, entities, or persons. The use of those generic terms is for convenience only, and is in no way indicative of how the Anglo American Group or any entity within it is structured, managed or controlled.

Anglo American subsidiaries, and their management, are responsible for their own day-to-day operations, including but not limited to securing and maintaining all relevant licenses and permits, operational adaptation and implementation of Group policies, management, training and any applicable local grievance mechanisms.

Anglo American produces group-wide policies and procedures to ensure best uniform practices and standardisation across the Anglo American Group but is not responsible for the day-to-day implementation of such policies. Such policies and procedures constitute prescribed minimum standards only. Group operating subsidiaries are responsible for adapting those policies and procedures to reflect local conditions where appropriate, and for implementation, oversight and monitoring within their specific businesses.

### Prevailing language

The English language version of this Policy shall be controlling in all respects and shall prevail in case of any inconsistencies with translated versions, if any. Any other language versions of this Policy are provided for convenience only.

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