

GROUP TECHNICAL STANDARDS

SHE Way Standard

Owner	Area
Group Head of SHE	Group SHE
Approved by	Approval Date
Technical & Operations Director	December 2024

Purpose

The SHE Way Standard is our Safety, Health and Environmental Management System (SHEMS). It provides a common operating framework to systemically manage SHE aspects, impacts, risks and opportunities, and facilitates continuous improvement through a review and improvement cycle, aligned with the Anglo American Operating Model.

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 of our Sustainability Strategy.

Contents

1.	SCOPE	2
2.	GOVERNANCE	2
3.	OVERVIEW	Error! Bookmark not defined.
4.	LEADERSHIP AND SUPPORT	3
5.	CONTEXT, PLANNING AND DESIGN	3
6.	OPERATIONS	4
7.	PERFORMANCE EVALUATION AND IMPROVEMENT	4
	APPENDIX A: INTEGRATION WITH OTHER DOCUMENTS	5
	APPENDIX B: RECORD OF AMENDMENTS	5
	APPENDIX C: GLOSSARY	5
	APPENDIX D: ACCOUNTABILITIES SUMMARY	5

SCOPE

This Standard applies to:

- 1.1. All employees, contractors and business partners, and visitors involved with Anglo American managed businesses and operations, including:
 - 1.1.1. Entire mining value chain and phases (e.g., exploration, design/projects, construction, operation, and closure).
 - 1.1.2. All types of mining activities (e.g., open cut, underground, alluvial, and marine) and related infrastructure.
 - 1.1.3. Processing activities (e.g., smelting and refining).
 - 1.1.4. Support activities (e.g., offices, marketing, warehouses, logistics, ports).
 - 1.1.5. Planning processes (e.g., Integrated Planning Processes, Resource Development planning, and Life of Asset planning).

This Standard does not apply to:

- 1.2. **Non-managed operations or phases**, in which Anglo American or its businesses have a shareholding. Anglo American should seek to influence these operations to adopt the requirements of this Standard and, at a minimum, to comply with local laws and requirements.

Legal compliance:

- 1.3. This Standard must be applied in conjunction with all applicable national laws and standards in the countries in which Anglo American operates.
- 1.4. National laws and standards always take precedence. If any of the provisions of this Standard conflict with applicable national laws and/or standards, the latter must be followed. However, the remaining provisions in this Standard will continue to apply.
- 1.5. This Standard must be complied with even if it contains more stringent provisions than those contained in the applicable national laws and/or standards.

Exemptions:

- 1.6. Exemptions from this Standard require the implementation of specified risk-based controls, approved by GM, Country & Regional Head, FRA, and Group Head of Function, and must comply with the **Technical Standards Governance Framework (AA TS 001)**.

Note:

- **BOLD** type in text refers to an internal Anglo American policy, standard, procedure, document or process.
- ***BOLD and Italic*** type in text refers to a SHE Way process, chapter or SHE Way tool

MANDATORY REQUIREMENTS

GOVERNANCE

- 2.1. Anglo American businesses, operations and projects must make sure that the SHEMS integrates with the existing document management system. Documented evidence to demonstrate the implementation and effectiveness of a SHEMS must be managed in accordance with the Group document management guidance, the **Technical Standards Governance Framework** and the **Group Data Policy**.
- 2.2. Where a supporting technology or platform is specified for use by Group, this must be used by the businesses and operations.
- 2.3. In line with the **Anglo American Purpose and Sustainability Strategy**, businesses and operations must incorporate SHE performance reviews, Management Reviews and continuous improvement cycles into annual objective setting, **Resource Development Plans (RDPs)**, **Life of Asset Plans (LOAPs)**, and **Integrated Planning Processes (IPP)**. Consider both internal and external factors that affect the key requirements for implementing and improving the SHE management system.

LEADERSHIP AND POLICY

- 3.1. In line with the **Leadership Framework**, Leaders are responsible for confirming compliance and implementing and improving the SHE management system within their area.
- 3.2. All employees, contractors, business partners, and visitors are responsible and accountable for their roles in the SHE management system. Responsibilities, approval authorities, and accountabilities must be clearly communicated and documented in role profiles. These must align with the **Organisational and Role Design Standard**, the **Technical Standards Governance Framework**, and the **SHE Way Guideline**, and integrated into recruitment and employment processes.
- 3.3. Anglo American businesses and operations must create a formal SHE policy for each country, business, or site, approved by the General Manager. This policy should align with the **Group SHE Policy** and include any necessary adjustments to meet local legal and regulatory requirements and must be displayed and communicated.

RESOURCES AND PARTICIPATION

- 4.1. Anglo American businesses and operations must identify and provide the necessary resources to implement and continuously improve an effective SHE management system. This includes clearly documenting and communicating responsibilities, competencies, and accountabilities for operating, and monitoring the evolving SHE system to all relevant parties.
- 4.2. Leaders must make sure that leaders, employees, contractors, business partners, visitors and other stakeholders understand how their actions affect SHE outcomes, understand the consequences of non-compliance, and are aware of their rights and protections under the system, and that they are competent and capable of fulfilling their responsibilities.
- 4.3. Competency and capability should be continuously evaluated, supported by training and development in line with Health of Discipline requirements, the **Technical Standards Governance Framework**, the **Anglo American Capability and Accountability Frameworks**, and compliance obligations to meet SHE goals.
- 4.4. A detailed *resource plan* must be created and approved by leadership, considering the key SHE actions and desired outcomes, and identifying the organisational, technological, and financial resources needed. The plan must make sure resources are aligned with the SHE management plan targets and objectives.
- 4.5. Leadership must make sure that documentation, handover processes, and resource management cover all aspects of the SHE management system to enable seamless continuity, particularly during transitions between different lifecycle phases.
- 4.6. SHE training and development programmes must be delivered effectively, tailored to the specific needs of each level of work to demonstrate the competence of participants. and be regularly reviewed for effectiveness and continuous improvement.
- 4.7. Vulnerable worker groups (e.g., pregnant women, HIV-positive individuals), these must be taken into account when designing work, assigning tasks, and providing training to support the health and safety of those workers.
- 4.8. Leadership must document and implement clear processes for effective communication, awareness, participation, and continuous improvement on SHE matters with all stakeholder groups.
- 4.9. Anglo American businesses and operations must provide resources and mechanisms (such as internal SHE participation forums and communication processes) to involve workers in consultation and participation in the development, implementation and improvement of the SHEMS. This includes addressing specific SHE issues, risks, and opportunities.
- 4.10. A *SHE communication and engagement plan* must be implemented and reviewed periodically to meet the main internal and external communication goals. The plan must be aligned with the **Anglo American Social Way Standard** and **Anglo American's Disclosure and Media Policy**.

CONTEXT AND SCOPE

- 5.1. Anglo American businesses and operations must document an initial integrated *context identification exercise* that includes an evaluation of internal and external needs and issues and documents the boundaries and interfaces of the SHEMS. This will inform business planning activities by highlighting SHE impacts and actions.

A context revalidation exercise must be conducted every three years or whenever significant changes in context occur.

- 5.2. Anglo American businesses and operations must maintain a consolidated **stakeholder register** (as also required by the **Social Way Standard**), identifying internal and external stakeholders, their relevant needs and expectations, the impact on them, and which of these could become compliance obligations or commitments.
- 5.3. The **context identification** process will guide the scope of an **Environmental, Social, and Health Impact Assessment (ESHIA)**, which must be completed and documented for operations and projects in line with the requirements of the **Investment Development Model (IDM)**.
- 5.4. SHE deliverables for projects must be incorporated into the **Investment Criteria by Stage (ICbS)** requirements and adhered to for projects under the **IDM** framework, as well as in planning processes such as the **IPP**.
- 5.5. Develop and maintain a formal **compliance obligations register** on an ongoing basis. This register will include Anglo American Group compliance requirements, obligations, commitments, stakeholder needs, and legal requirements related to SHE and in line with the **Human Rights Policy**. The business or operation may combine this register with commitments outlined by the **Social Way Standard**, external performance and reporting requirements, and other relevant stakeholder expectations.

PLANNING AND DESIGN

- 6.1. Informed by the **context**, **scope** and **planning** activities, each Anglo American business or operation must identify and manage SHE risks, impacts, and opportunities according to the **IRM policy**, **AAOM**, **TRM**, **Group Technical Standards** and **Control of Work Procedures** and implement SHE performance targets and objectives.
- 6.2. Document and assess social and community health impacts according to requirements for **Social and Human Rights Impact and Risk Analysis (SHIRA)** defined in the **Social Way Standard**.
- 6.3. Communicate the plan, along with the SHE objectives and targets, to employees, contractors, and business partners. Incorporate these into the operations **operating master schedule (OMS)** and monitor them on an ongoing basis.

OPERATING

- 7.1. Develop and maintain relevant operational and maintenance procedures to manage SHE risks. These procedures must include controls identified in the risk management process outlined in the **TRM** and **Control of Work** procedures, as well as the **Technical Standards** and supporting documentation. Maintenance strategies and procedures must consider the SHE criticality of equipment.
- 7.2. Anglo American businesses and operations must require contractors and business partners to operate according to the **Group SHE Policy**, **SHE Way Standard**, and all relevant **Technical Standards**.
- 7.3. Develop a comprehensive contractor and business partner management system that is integrated and embedded. This system must include continuous monitoring mechanisms to evaluate contractor and business partner performance regarding SHE requirements, following the **Group Contractor Performance Management Policy** and the **Group Contractor Performance Management Procedure**.
- 7.4. Anglo American businesses and operations must create, implement, and maintain a management of change process for administrative, technical, and organisational changes. This process must manage all permanent, temporary, and urgent changes, in compliance with the **IRM Policy**, with additional controls for consequence levels 4 and above on the **IRM matrix**.
- 7.5. Anglo American businesses and operations must comply fully with the **Group Emergency Management Standard** and the **Group Total Health Standard** to prepare for and respond to credible and risk-based emergency situations, and with the **Group Resilience Policy** by preparing, resourcing, and engaging in communication during a live crisis.

PERFORMANCE EVALUATION AND IMPROVEMENT

- 8.1. Each Anglo American business or operation must measure and evaluate its SHE performance and the effectiveness of the SHEMS by developing and implementing a detailed **SHE Monitoring Plan**. This plan should enable tracking and reporting on performance against targets, objectives, compliance obligations, legal requirements, Anglo American Group requirements, and the **SHE Way Standard**.

- 8.2. Using all elements of the SHEMS to make informed decisions on resources, strategic direction, and improvement opportunities, Management must review the SHEMS at least annually to confirm its ongoing suitability, adequacy, and effectiveness through a **Management Review**.
- 8.3. The outputs of the **Management Review** must be documented, retained, and communicated to stakeholders as required by communication processes and compliance obligations. Follow-up actions must be tracked, and immediate actions taken when necessary. This review process must include evaluating and realigning business and operational five-year plans through the IPP.
- 8.4. Aligned with the **RAG policy** and three lines assurance model, each business or operation must create and maintain a risk-based audit and assurance programme and conduct assurance activities. This programme should be informed by the system's **context-setting, scoping** activities, and clearly defined methods, focusing on meeting compliance obligations and SHE **objectives**.
- 8.5. All incident management must fully comply with the **Learning and Investigations Management Standard**.
- 8.6. For non-conformances, including unmet commitments and control failures, a proactive process must be in place to report, analyse, and investigate them based on their severity, frequency, and categorisation to determine appropriate corrective actions.
- 8.7. Anglo American businesses and operations must develop an actions management process that includes the timely development, approval and verification of actions. In line with the **IRM policy** and **TRM procedure**, the process should establish clear expectations to prioritise and address significant findings, with remedial action plans endorsed at the appropriate levels.
- 8.8. Have a process in place to measure the close-out rate and quality of SHE-related actions from performance monitoring activities, and first, second, or third line assurance activities, as part of **Management Reviews**.
- 8.9. Anglo American businesses and operations must have mechanisms to receive and address feedback and grievances from internal and external stakeholders, implementing remediation measures as needed.

APPENDIX A: INTEGRATION WITH OTHER DOCUMENTS

For detailed information on specific terms or abbreviations, we encourage you to access the PowerBI Tool which contains the Standards Glossary and References. You can access it directly via this [link](#).

APPENDIX B: RECORD OF AMENDMENTS

Version	Approved	Authors	Changes Made
1	2018	Francesco Raveggi	Consolidation of the three separate 'ways' (one for each of the SHE disciplines) into an integrated SHE Way.
2	2021	Kris Miller	Detailed expansion of SHE Way V1 to include ISO 14001 and ISO 45001 requirements in addition to all relevant AA Group requirements.
3	2024	Kris Miller	Consolidation of Specifications into Standard and simplification of requirements. Removal of ISO aligned requirements.

APPENDIX C: GLOSSARY

For detailed information on specific terms or abbreviations, we encourage you to access the PowerBI Tool which contains the Standards Glossary and References. You can access it directly via this [link](#).

APPENDIX D: ACCOUNTABILITIES SUMMARY

For comprehensive details regarding the responsibilities involved in implementing this Group Technical Standard, consult the **Technical Standards Governance Framework (AA TS 001)**. This document outlines the specific roles and duties associated with the implementation of this Standard.