



# CONTENTS

## 01 PLANNING




## 03 ENVIRONMENTAL ASPECTS AND IMPACTS, SAFETY AND HEALTH HAZARDS



## 06 WHAT IS THE OUTPUT OF PLANNING



## 08 HOW DOES PLANNING FIT INTO THE REST OF THE SHE WAY?



## 02 COMPLIANCE OBLIGATIONS INCLUDING LEGAL REQUIREMENTS




## – COMPLIANCE OBLIGATIONS – COMPLIANCE ACTIVITIES

## 04 RISKS AND OPPORTUNITIES



## 05 OBJECTIVES SETTING



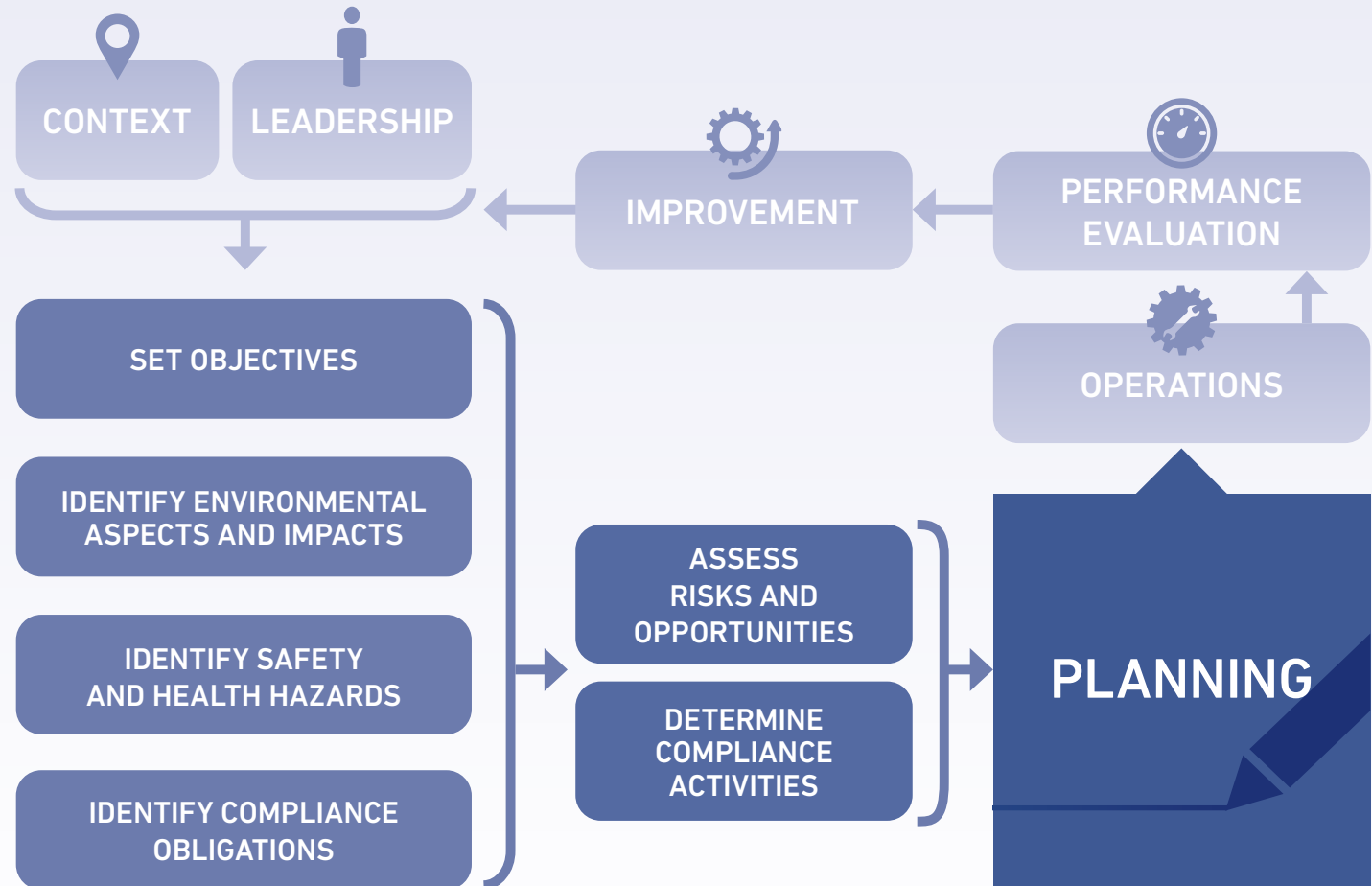
## 07 REFERENCE TO STANDARDS





# PLANNING

We set clear plans and objectives that 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



## Why?

We plan the activities of the SHE management system, so it is fit-for-purpose including roles and responsibilities, systems, procedures and so that it integrates well with other existing and planned future systems and processes.

Planning results in service strategies that take account of the SHE requirements and address compliance obligations, SHE aspects and hazards, risks and opportunities, preparation for and response to emergency situations and which take learnings from real and simulated events.



## How?

→ To plan the SHE management system, Anglo American businesses and operations need to use information about the current situation as identified through the Context and Leadership activities in the **SHE Way Context and Leadership Specification chapters** so that actions are identified and planned to reach the desired objectives.

→ Planning for the SHE management system must consider processes already in place (SHE or otherwise, if relevant) and improvement opportunities identified for these. Suitable and proportionate management arrangements, risk control systems and operational precautions must be designed and developed for implementation. For the SHE management system, actions will include determining which processes need to be established, by whom and by when, who will operate the processes, how they will be monitored and documented and continually improved.

→ Planning to deliver our objectives also includes identification of service strategies (as defined in the **Anglo American Operating Model**) to manage threats to our intended outcomes through service actions. Service action planning includes the definition of outcomes, specifications and tolerances, methods of execution, conditions and constraints and resource requirements. Trigger events may also be identified, especially with regards to potential emergency situations.

→ Planning is not a single event but is an ongoing process that anticipates changing circumstances and continually determines risks and opportunities. Given the multi-disciplinary nature of SHE, arriving at the SHE management system plan and determining the service strategies would involve a team that is aware of the context and capabilities available, understands the needs and expectations of stakeholders, is up to date with leading discipline practices, has been A series trained and has the authority and influence in the business or organisation to drive actions.



# PLANNING



## How?

→ Planning must involve worker participation and consultation including but not exclusive to during the risk management process, planning effective responses and in designing and implementing the SHE management system. It must also include change management and communication activities, see the **SHE Way Support Specification chapter**.

→ Before executing planned work, the relevant requirements must be identified, execution planned and optimised and the planning actions approved. Leadership commitment and involvement is key to the success of Planning activities. It ensures that the resulting actions align to overall strategy and that consistency and discipline is maintained in Planning.



# COMPLIANCE OBLIGATIONS INCLUDING LEGAL REQUIREMENTS

## COMPLIANCE OBLIGATIONS



### Why?

Compliance obligations for our businesses and operations come from a wide variety of mandatory and elective sources including global, regional, local, license to operate and internal requirements. Compliance obligations include legal requirements, which are mandated by legislation or regulation and are required by the country and/or jurisdiction of operation and entity establishment. Compliance obligations are not only legal requirements and may also be imposed from other sources and expectations.

The context that has been defined for the SHE management system will inform which compliance obligations are within scope, these must therefore be identified, evaluated and management of these planned to ensure that stakeholder expectations are met and that requirements are tackled in the most effective and efficient way.



### How?

→ Comprehensive identification of SHE compliance obligations and legal requirements for a business or operation requires a broad range of inputs and understanding of how these relate to the planned (current and future) business or operational activities. This may mean specialist input in addition to a central coordinator that records and manages the list of compliance obligations identified as an initial process (if not undertaken previously) and then on an ongoing basis.

→ The management of this [+ COMPLIANCE OBLIGATIONS REGISTER](#) will require access and update processes with active information channels to the sources of compliance obligations. In some cases e.g. legal and regulatory updates, alerts of changes may be used to trigger an update however, mostly, the update of the [+ COMPLIANCE OBLIGATIONS REGISTER](#) will be a manual review process requiring reflection and positive response by relevant functions.

→ SHE requirements may overlap or inter-relate with **Social Way** and other external standard requirements in implementation, measurement or reporting so these compliance obligations must be managed in the same [+ COMPLIANCE OBLIGATIONS REGISTER](#) or in a process or system that allows for integration.

→ Identification of SHE compliance obligations includes external and internal mandatory requirements. The minimum mandatory critical controls.

# COMPLIANCE OBLIGATIONS INCLUDING LEGAL REQUIREMENTS

## COMPLIANCE OBLIGATIONS



How?

→ The **+ COMPLIANCE OBLIGATIONS REGISTER** must build on the requirements identified in the Context setting exercise (as outlined in the **SHE Way Context Specification chapter**) and capture as a minimum:

- The source of the compliance obligation including latest published date, if appropriate
- Any term or duration of the compliance obligation
- The source of the compliance obligation, e.g. International Anglo American commitment, country statute, group, voluntary organisation, elected standard, contractual or JV, mining license, etc.

- The reference to and description of the obligation
- Any specific areas/ locations of the organisation or business that it refers to
- Reporting requirements for the obligation including period of reporting
- Date of last update to the register
- Assigned person to contact re: management of this obligation within the operation;
- Latest and dated status of this obligation
- Key actions/ process to comply with responsibilities, status and due dates or where this information is retained and mapped. These actions may be documented using Isometrix.

→ The **+ COMPLIANCE OBLIGATIONS REGISTER** must be reviewed and approved at regular intervals by management.



# COMPLIANCE OBLIGATIONS INCLUDING LEGAL REQUIREMENTS

## COMPLIANCE ACTIVITIES



### Why?

Compliance obligations require action. This can be monitoring and reporting activities but will usually also require additional activities or processes. To demonstrate compliance and fully meet requirements, once compliance obligations are identified, measurement and monitoring of these through compliance activities is needed.

These activities must be planned and designed to reduce inefficiencies and duplicate systems and to ensure understanding of requirements across our businesses and operations.



### How?

→ Key actions to manage compliance activities will include incorporating the requirements into standard operating procedures, work execution documents, job risk assessments and other instructions. Mechanisms and techniques for monitoring compliance to specific limits such as occupational exposure limits and emissions or trigger points for urgent escalation must be established.

→ Anglo American businesses and operations need to understand the competence and resource requirements to meet compliance obligations and where required, provide training or supplement resources to provide the needed expertise. Alongside this, general knowledge of compliance obligations, their requirements and the corresponding activities must be understood across the Anglo American business and organisation.

→ An annual, resourced and planned **+ ASSURANCE PROGRAMME** must be established that includes the compliance activities, this programme must be approved by management and the relevant governing body.

→ Not all compliance activities will require assurance annually, so the specific required intervals must be determined and planned to maximise the effectiveness and efficiency of the **+ ASSURANCE PROGRAMME** to meet its aims.

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# COMPLIANCE OBLIGATIONS INCLUDING LEGAL REQUIREMENTS

## COMPLIANCE ACTIVITIES



How?

→ A SHE **+ ASSURANCE PROGRAMME** may include multiple parties and inputs to result in overall coverage across disciplines. Where external parties are used, confirmation of their understanding of the Anglo American operating environment and context must be obtained. This includes external parties undertaking assurance activities relating to the SHE management system for external standards. They must be briefed on the SHE Way. Internal auditors must be qualified in the specific discipline or area that they are reviewing, experienced, competent and must have undertaken SHE Way training.

→ The **+ ASSURANCE PROGRAMME** will include **+ SHE WAY READINESS ASSESSMENT** of compliance to the SHE Way Standard and Standards self-assessment to relevant Technical and SSD standards. In planning the assurance programme, the areas of reliance on specific self-assessments must be identified to prevent undue duplication and misalignment e.g. if a self-assessment is undertaken for Emergency Management Standard then providing it is timely, this will be used as an input to evaluate readiness of compliance with the **Emergency preparedness and response** requirements of the SHE Way.

→ Isometrix audit scheduler tool must be used to manage compliance and assurance activities. This will enable single points of assurance and related activity planning and scheduling.

→ The annual **+ ASSURANCE PROGRAMME** must be widely communicated and affected parties and stakeholders notified as far in advance as possible.

→ Consultation and participation forums must be used within workplaces to communicate upcoming compliance activities and the related responsibilities of leaders and employees.



# ENVIRONMENTAL ASPECTS AND IMPACTS, SAFETY AND HEALTH HAZARDS



## Why?

The identification and evaluation of the significance of environmental aspects considering impacts is included in the SHE Way in line with environmental leading practices including ISO14001. This is undertaken as a step before considering risks and opportunities that result from these aspects and impacts.

The identification of SHE hazards is included in the SHE Way in line with safety and health, and environmental leading practices including ISO14001 and ISO 45001. This is undertaken as a step before considering

risks and opportunities that result from these hazards.

Building from the clarification of the context and scope in which the SHE management system operates, considering the overall environmental aspects and impacts and safety and health hazards reduces the potential for gaps especially with regards to longer term impacts such as biodiversity damage, human health, mental health and wellbeing.



## How?

→ An aspect is an activity, product or service that interacts with the environment. An impact is where this aspect changes the environment either adversely or beneficially. A significant environmental aspect is one that has or can have one or more significant environmental impacts. Environmental impacts can occur at local, regional and global scales, and also can be direct, indirect or cumulative by nature.

→ An environmental aspects and impacts register, as captured in the baseline risk assessment, must include relevant information to define the environmental aspect and impact so that this can be used for risk assessment purposes by others consistently this includes:

- Aspect (e.g. biodiversity, GHG emissions, water usage)
- How it arises/ links to our activities
- Form and/or unit of measurement
- Location(s)
- Magnitude or what magnitude is relevant
- Potential impacts
- Actions planned to address the identified impact e.g. mitigate, reduce, manage, leverage and scale (when it comes to opportunities) etc.
- Any associated targets for the specific impacts e.g. reduction, improvement, increase measured in the relevant units/ forms and linked to the relevant organisational strategic targets and objectives
- Ownership and accountability for addressing the impacts and managing the targets with clear timelines.

→ Identification of environmental aspects includes assessment of any interactions with the environmental aspects in the course of business activities and resulting impacts, including consideration of changes, such as new or planned developments and new or modified activities, products and services. The process must also accommodate abnormal conditions, shut down and start up conditions and emergency situations and any resulting implications for the environment and associated stakeholders.



# ENVIRONMENTAL ASPECTS AND IMPACTS, SAFETY AND HEALTH HAZARDS



## How?

→ A source of potential harm to the achievement of an operations business objectives including people, facilities, the environment or the community is referred to as a 'hazard'. A robust safety and health hazard identification process must include compiling and maintaining a hazard inventory as required for **ORM** baseline risk assessments.

→ The hazard identification process must include the identification of High Potential Hazards (HPH) and align to **Learning from Incidents** processes in reporting these and taking into account key learnings from other Anglo American business and operations.

→ The hazard inventory as captured in the baseline risk assessment must include relevant information to define the hazard so that this inventory can be used for risk assessment purposes by others consistently this includes:

- Business Area (location, function, business/project)
- Process/ Activity
- Hazard/ Risk Source Classification
- Hazard/ Risk Source Description
- Magnitude of Hazard (or what magnitude is relevant)
- Mechanisms of Hazard Release
- Assumptions/ Uncertainties



# RISKS AND OPPORTUNITIES



## Why?

Integrated Risk Management is a key component of Anglo American's approach to being a safe and responsible company with a sustained licence to operate. All projects must manage the risks associated with their environment and activities. Every person has a different perspective of risk based on their training, past experiences, culture, and area of expertise.

Because of this, it is important to include different perspectives during a risk management process, for example including people from different disciplines, with different levels of experience, so that a more comprehensive and practical risk assessment can be produced.



## How?

→ In addition to consideration of SHE risks, SHE planning also includes identification of SHE opportunities. This can include opportunities to improve the use of the SHE Way as well as address the identification of aspects, impacts and hazards, how they are communicated and the analysis and mitigation of known hazards and impacts. Opportunities may result in improvements to other business priorities as well such as process efficiency, quality, productivity, cost effectiveness and collaboration between departments and functions.

→ The identification and assessment of SHE related risks and opportunities must to be completed in line with Anglo American's four-step **ORM** approach: Baseline risk management; Issue based risk management; Task risk management and Continuous risk management. Those undertaking Operational Risk management processes for Planning the SHE Way, as per the **SHE Way Planning Specification**, must be competent and have undertaken A Series training.

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# RISKS AND OPPORTUNITIES



→ Risk and opportunity identification takes into consideration: environmental aspects and impacts from activities, products and services; safety and health hazards; potential emergency situations; compliance obligations; and lessons learned from real and simulated events. Feedback in the form of analysis and improvement opportunities from Work management including process performance and achievement against objectives is key to the **Anglo American Operating Model** and this must be the case for SHE planning activities.

→ In all cases, it is necessary to define a team of people and their respective responsibilities to undertake risk and opportunity assessments. Wherever possible, a diverse team including contractors must be involved in processes which include wider considerations such as Workplace Risk Assessment and Control (WRAC). A team of different responsibilities, technical expertise, levels of experience and hazard exposures must be involved to maximise the transfer of knowledge within the group, to gain a realistic, comprehensive and balanced assessment of the risks and to encourage and demonstrate participation and consultation by all workers.

→ Risks and controls identification and analysis using methods such as bow-ties benefit from a wide representative group where technical understanding and operational expertise is balanced. This supports in a complete view and supports in making controls implementable and suitable for purpose.

→ Risk and opportunity assessment must be undertaken in a timely manner before work commences and the relevant controls required must be embedded within work instructions including Job Risk Assessments and Work Execution Documents.

→ Critical controls must be identified for all Priority Unwanted Events as per the **ORM standard** and included in JRAs.

# OBJECTIVES SETTING



## Why?

Objectives are established to maintain and continually improve SHE performance in line with our SHE policy. Establishing objectives provides direction for the SHE management system and alignment to strategic direction including the FutureSmart Mining™ program.

Establishing targets and indicators to measure achievement of the SHE objectives enables the business or operation to track progress and focus on continual improvement of the SHE management system and SHE performance.



## How?

→ Objectives must reflect the specific context, aspects, hazards, compliance obligations, risks, opportunities, readiness to manage emergency situations and learnings from real and simulated events of the Anglo American business or operation. Objectives are also informed through the **Learning from Incidents** process as applied to other Anglo American businesses and operations, immediate and global calls to action and reference to industry and global priorities and developments.

→ Plans to achieve SHE objectives must clarify the actions that will be completed, how they will be integrated with business processes. Plans include the required human, technology

and financial resources, responsible and accountable persons, timeframes, process for communicating and measurement or framework for evaluating achievements.

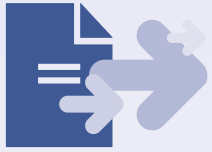
→ SHE management plans are developed and approved annually as a minimum requirement, plans must be flexible and adaptable to emerging and reprioritisation risks and issues such as changes in the environment and/or contextual basis. New compliance obligations, emergency response planning and learning from incidents may result in significant update to plans, approaches and objectives required during the year. Such changes will still require governance and approval.

→ Objectives set for the SHE Way must be able to be monitored. Objectives must be aligned to definitive outcomes, measures or KPIs to enable evaluation of whether objectives have been met. Measures can be quantitative or qualitative in nature and reference must be made to SHE related KPIs that form part of the balanced scorecard where applicable.

→ The SHE plan and SHE objectives including the level of stretch in targets and time frames proposed will drive the resource (including budgetary) requirements, see Resources in the **SHE Way Support Specification chapter** for more details. Potential resource and other constraints must be considered, addressed and escalated.

→ In addition to performance objectives, process objectives must also be set to measure the performance of the SHE management system itself including but not exclusive to **+ SHE WAY READINESS ASSESSMENT** measure.

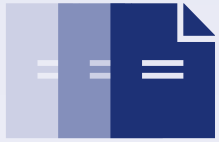
→ SHE Objectives must be set, documented and approved by senior management at least annually, including consideration of the definition of indicators used and measurement of these. Progress against objectives must be reported periodically (usually monthly or quarterly) to senior management, SHE Committee and the relevant Board or governing body with clear trigger points for escalation, interventions and investigations to determine actions where the intended targets are not being achieved.



## WHAT IS THE OUTPUT OF PLANNING?

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 PLANNING FIT INTO THE REST OF THE SHE WAY?

