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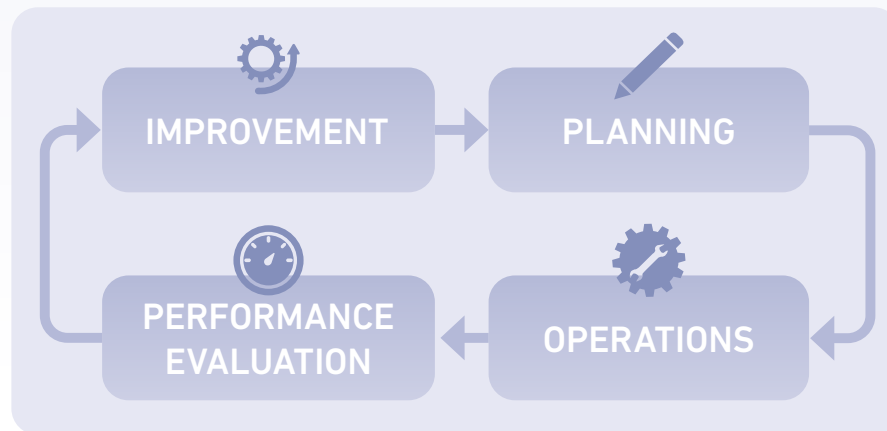


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HOW DOES  
SUPPORT  
FIT INTO  
THE REST  
OF THE  
SHE WAY?



# SUPPORT

We support the SHE Way with the right people at the right place doing the right work in the right way to drive SHE excellence. We engage with and include everyone in our SHE journey, expecting everyone to actively participate and contribute.



SPECIFIC REQUIREMENTS, INPUTS AND OUTPUTS





# RESOURCES



## Why?

To activate the SHE Way and implement and maintain a fit for purpose SHE management system, the right resources are required including human resources, natural resources, infrastructure, technology and financial resources. Management has a responsibility to ensure that those with SHE management system responsibilities are supported with the necessary resources for the functioning and improvement of the SHE management system and to enhance our SHE performance.

Strong identification and upfront planning of resource requirements enables effectiveness and overall business performance improvements through efficiency. Communication and escalation of resource challenges and constraints to management allows for informed decision making with regards priorities, timelines, management of risks and allocation of shared resources.



## How?

- In alignment with the SHE objectives and SHE management plan (see the **SHE Way Planning Specification chapter**), a detailed **+ RESOURCE PLAN** should be developed and approved by management that considers the key SHE actions and outcomes intended and what resources are needed.
- The plan must be supported by the estimated budget allocations necessary to carry out the required activities with forecasts and a stated contingency allowance for change within the year.
- Handover of resources and how this will be actioned should be clearly identified to ensure continuity of SHE management, for example, between lifecycle phases.

→ Where another party such as contractor or business partner is responsible for the SHE management system, it is still required that Anglo American resource expectations and plans for these are documented and understood.

→ All Anglo American staff must have access to the supporting resources which will help them to identify and manage SHE risks and opportunities and participate in the management system. Appropriate access to resources should be provided to contractors, business partners and other third parties to fulfil their SHE Way roles and responsibilities.

CONT ▶





# RESOURCES



## How?

### HUMAN RESOURCES

→ Estimated time commitment and assigned activities and responsibilities for the SHE management system and key activities of the SHE management plan should be identified for human resources. This includes shared resources so that capacity demands are clearly articulated and understood and can be communicated consistently.

→ Responsibilities and accountabilities for implementation, operation, maintenance and monitoring of the SHE management system to employees, contractors, and any other relevant parties must be formally documented and incorporated in individual job descriptions, contracts, statements of work or other formalised documentation.

→ Handover of activities and responsibilities between the lifecycle stages or other operational phases and changes must be identified, including notifications and mobilisation of the appropriate people to ensure no interruptions to SHE responsibilities. For compliance obligations in particular, this may require a planned parallel running to prevent gaps.

→ SHE responsibility and resources must be allocated across different levels of the organisation and functions. The aim is to ensure that SHE is not concentrated in one role but is instead embedded and considered in all operations, disciplines and function with key champions and points of contact to drive messaging.

### SHE GOVERNANCE

→ An organisational structure that defines roles, responsibilities, and authority to implement SHE management system must be established and maintained. Input from relevant expert third parties may be sought.

→ SHE governance also includes identification of SHE resources including specific personnel with well-defined SHE responsibilities, management oversight, participation in the Executive level Site/ Operational Management SHE Committees that deal with SHE matters and other supporting human resources needed to support SHE activities.

### REFERENCE RESOURCES

→ Reference resources must be developed, formalised and made readily available across all levels of the organisation and stored in a SHE Reference library on the intranet or other system to be accessible. This will leverage Group resources but, in most cases, will also include specific material such as SOPs that need to be available and accessible to everyone at all times.

### ENABLING RESOURCES

→ Infrastructure such as buildings, plant, equipment, IT systems, communication systems and emergency containment needed to fulfill the requirements of the SHE activities must be identified in the **+ RESOURCE PLAN**. The maintenance and responsibility for the condition of these to ensure they are fit for purpose should also be identified.

→ Access to specialist services such laboratories used to process environmental and health related samples accredited to relevant ISO standards, or through national body must be identified in the **+ RESOURCE PLAN**.

→ Where necessary, for example projects posing potentially significant adverse impacts or where technically complex issues are involved, involvement of external experts may be required. These should be clearly identified in the **+ RESOURCE PLAN**.



# RESOURCES



How?

## SUPPORTING AND ENABLING SYSTEMS

→ The **+ RESOURCE PLAN** should make note of supporting and enabling systems used to capture, monitor, report and plan SHE management matters. This may include systems that are not SHE specific but will contain and manage SHE related data and information such as those used for measurement, performance management and reporting.

→ Where there are likely to be changes in the way SHE management system operates (e.g. implementation of a SHE management system for the first time, changes resulting from identified improvements or recommendations from the auditors etc), or changes to any of the components of the SHE management system related activities on site (e.g. due to changes in Context or Planning outcomes etc), Change Management should be taken into account in order to deliver and embed these changes, in line with the Anglo American **Change Management Framework** and leveraging associated **Change Management Toolkit**.

→ Staff at all assets must have access to Isometrix for capturing, monitoring, reporting and planning SHE management matters. In rare cases where direct access is not appropriate then a process to enable indirect access through reporting to designated individuals or manual reporting should be established so that systems are accurate and complete. Examples may include capturing PTO using Isometrix, Work Execution Platform (WEP) or other available tools.





# COMPETENCE



## Why?

Managers of each Anglo American business or operation must have a formal system(s) in place to ensure that their personnel, Contractors and Business Partners are competent and capable to perform their activities in alignment with the **Anglo American Capability Framework** and, the **Accountability Framework** and to meet Anglo American's SHE intended outcomes.

The **Capability Framework** describes the qualities required in roles to enable the organisation to have the right people in the right roles doing the right work.

We must ensure that our employees and contractors are aware of how they can impact SHE outcomes and are competent to complete their activities. This is supported by our approach to training, capacity building and capability development.

Competency measures must ensure and deliver a workforce that is competent and capable and can demonstrate this regardless of context, circumstances or activity they are performing by making the decisions and choices that are in line with the SHE Way and are conducive to implementing effective SHE management systems and keeping our staff, partners and environment safe.



## How?

→ The SHE program must be designed and carried out by competent professionals, which means that they have relevant education, knowledge, proven experience, necessary skills and training to carry out the required work.

→ Required competencies and capabilities must be determined, clearly defined, and be based on appropriate education, training, job function and experience as well as occupational exposure to SHE performance aspects. These must be formally documented in a manner aligned to the **Capability Framework**.

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# COMPETENCE



## How?

→ A formal process of assessing competency of personnel and contractors must be established. Assessments must be conducted on a regular basis to determine training needs, and results must be documented with actions clearly identified and assigned.

→ In the event that the competency assessment results identify gaps that cannot be rectified by training or it cannot be rectified in a timely manner, additional controls must be implemented, such as:

- Additional specialist resources to close the competency gap
- Increased safeguards
- Enhanced oversight
- Provision of detailed guidance and instructions etc as may be necessary in the circumstances.

→ Training programmes must be founded on continual improvement and building the desired workplace and working cultures, whilst developing the 5 elements of capability (Mental Processing Ability, Knowledge, Technical skills, Social Process Skills & Application) to the levels of work.

→ Training and development programmes must be delivered effectively and appropriately to enable capable and competent workers and at no cost to the workers.

→ Training programmes should consider evolving needs and be delivered at different times during employment, as a minimum this includes:

- As part of recruitment and onboarding
- At the point of change in roles and promotion
- On the job, role specific and refresher training delivered via an e-learning or a face to face format
- Coaching and “Train-the-trainer” training to help with the roll out and spreading of SHE information for those in relevant positions with SHE responsibilities.

CONT ▶







# COMPETENCE



## How?

→ Learning, development and training programmes must be periodically reviewed for effectiveness and relevance (due to potentially ongoing changes in the context) to ensure that they remain appropriate to the nature and extent of the operation's SHE-related risks. Training programmes also must be evaluated by those who participate in them - [+ TRAINING EVALUATION FORM](#) can be used for this evaluation.

→ Requisite documented evidence demonstrating competence improvements resulting from learning, development and training programmes must be retained on file for a period required by the local document management guidelines and in line with the **Competency Framework**.

→ In meeting regulatory requirements and compliance obligations, appropriate documented information must be retained as evidence of:

- Competence on completion of the training courses, programmes and assessments
- Qualifications and their refresh
- Continuous professional development
- Roll out, review and refresh of the training programmes and courses
- Any other evidence of completion of competence development programmes and interventions and demonstrable competence enhancement of individuals trained.

This evidence may be retained as records and reports, which must be accurate and up to date.



# ENGAGEMENT AND PARTICIPATION



## Why?

Engagement and participation of workers and other stakeholders is not only a requirement of the SHE management system, but also provides a mechanism to contribute to the overall SHE performance and continual improvement. An environment that includes engagement and participation is critical to the effectiveness of SHE management system.



## How?

→ A **+ COMMUNICATION AND ENGAGEMENT PLAN** must be developed to address the key objectives of internal and external communication and to clarify the modes, timeframes, roles and responsibilities for communication, key messages and the target audiences.

→ The communication plan must:

- At a minimum, drive awareness internally of:
  - SHE policies, significant SHE aspects and significant impacts and SHE-related risks and opportunities associated with a person's work
  - The role of individuals in contributing to the effectiveness of the SHE management system
  - The implications of non-conformance with SHE requirements including defined compliance obligations
  - Progress against SHE performance targets and expectations.
- Communicate SHE information in a manner that is both reliable, timely and consistent with the information generated within the SHE management system to enable effective decision making to improve performance
- Ensure changes to the SHE management system are communicated in a timely manner to workers and other stakeholders as relevant.

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# ENGAGEMENT AND PARTICIPATION



## How?

→ The activities set out in the **+ COMMUNICATION AND ENGAGEMENT PLAN** should be executed in line with the plan. Where there are any gaps, omissions or inconsistencies between the plan and actual delivered actions, a review of the discrepancies must be performed as part of the periodic Communications plan review (or as a discrepancy has been identified – whichever is sooner); and either necessary corrective actions taken or the justification for the discrepancy documented and approved in line with the **Accountability Framework**.

→ The **+ COMMUNICATION AND ENGAGEMENT PLAN** must be reviewed periodically to reflect any changes in circumstances, feedback on the effectiveness of the communication, training and other engagement programmes designed to enable SHE management systems and awareness; as well to identify any opportunities for improvement based on the impact and results of the activities conducted to date.

→ Formal communication, planned and executed, must be stored and retained to enable auditability, transparency and records.

→ When developing the **+ COMMUNICATION AND ENGAGEMENT PLAN**, the following considerations need to be addressed in the Plan:

- Legal, regulatory and other compliance requirements
- Consistency of how SHE information is communicated internally and externally
- How external communication is impacted by different circumstances and scenarios e.g. business as usual, emergency response, extraordinary event, external event or external changes affecting the organisation etc

- How to ensure and evidence that the information communicated is reliable
- Compliance obligations, expectations, risks and opportunities when planning the external communication
- The modes, channels, timeframes, roles and responsibilities for communication, content and target audiences
- How two-way communication including active engagement and participation is encouraged and monitored.



# INTERNAL COMMUNICATION AND AWARENESS



## Why?

Everyone at Anglo American must know what the **SHE Policy, SHE Way** and **SHE Objectives** are; their obligations and rights to participate in and contribute effectively to the SHE management system; the repercussions for failing to conform to SHE requirements; and their rights and protections under the SHE management system.

We must ensure that our employees and contractors are aware of how they can impact SHE outcomes, are supported to complete their activities and provided with strong governance systems to manage and communicate our SHE performance both internally and externally using robust information.



## How?

→ Develop and implement defined processes to ensure effective communication, awareness, consultation and participation of SHE matters across all levels and functions of the organisation. The processes must be formally documented and ratified by management.

→ An **+ COMMUNICATION AND ENGAGEMENT PLAN** must be developed to document a formal process for involving workers' representatives to ensure effective worker consultation and participation in SHE matters. This may be included as a section in the **+ COMMUNICATION AND ENGAGEMENT PLAN** if appropriate.

→ The process can be delivered via a Workers Representation Committee liaising with a senior SHE Committee made up of cross-departmental representation across different levels chaired by an elected Chairperson. The SHE Committee will act as a governance body and a conduit for the information from Group management as well as reviewing the consultation outcomes and inputs from the consultation process to communicate to the site management and the Group.

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# INTERNAL COMMUNICATION AND AWARENESS



## How?

→ The Engagement and Participation processes and plans must provide a mechanism to:

- Conduct engagement activities with the workers and workers' representatives to facilitate meaningful engagement
- Facilitate participation and input from the workforce on the design, implementation and effectiveness of the SHE management systems
- Solicit and capture any feedback, input and contributions from the workers on the mechanisms for Engagement and Participation and their effectiveness

- Feedback on the actions taken as a result of the Consultation process
- Update and engage workers in key SHE management processes including but not exclusive to **Management of Change** and incident origin.

→ The Engagement and Participation processes and plans must inform workers of their rights to:

- Stop work, report accidents and non-conformities, dangerous occurrences and hazards to the employer and to the competent authority
- Request and obtain, where there is a cause for concern, inspections and investigations to be conducted by the employer and the competent authority
- Know and be informed of workplace hazards that may affect SHE performance and outcomes
- Stop work, remove themselves from any location at the asset when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health

- Collectively select SHE representatives
- Participate in inspections and investigations conducted at the workplace by the employer and by the competent authority
- have recourse to advisers and independent experts
- In all cases a worker attempting to exercise any of the rights in good faith, shall be protected from reprisals of any sort.

→ The Engagement and Participation process and plan must encourage participation of workers in continual improvement activities.



# EXTERNAL COMMUNICATION



## Why?

Defined processes must be developed and implemented to communicate externally with stakeholders on information relevant to the SHE management system, fulfilment of its compliance obligations, as well as to respond to relevant communications on its SHE management system.



## How?

→ Identify from the **+ [COMMUNICATION AND ENGAGEMENT PLAN](#), [+ STAKEHOLDERS REGISTER](#) and [+ COMPLIANCE REQUIREMENTS/OBLIGATIONS REGISTER](#) what, when, with whom and how the organisation will communicate with regards to external stakeholders and interested parties.**

→ The plans and processes must be aligned to Anglo American's stakeholder engagement processes and integrated into the **+ [STAKEHOLDER ENGAGEMENT PLAN](#).**

→ SHE stakeholder communications may overlap or inter-relate with **Social Way** and other external standard requirements so planned communication channels should be managed in the same process or using a system that allows for integration and consistent messaging.

→ All external communications must also take consideration of **Anglo American's Disclosure & Media Policy** and individual's data protection requirements.

→ The views of external interested parties should be considered in establishing its communication process(es). These should be collated through the Stakeholder engagement process as per the Site's **+ [STAKEHOLDER ENGAGEMENT AND PARTICIPATION PLAN](#)**, as well as through any feedback received on past communication activities.

→ A clear process for managing the complaint and queries must be formally documented, with the roles and responsibilities assigned, including the mechanism and process for providing feedback on the status of the complaints and any actions taken to the stakeholders who originally raised the complaint.

Comments complaints and enquiries must be formally logged, recorded in an **+ [COMPLAINTS LOG](#)** and escalated in line with the site Roles & Responsibilities assignment to ensure their resolution. The log must be reviewed periodically to ensure that all complaints and queries have been addressed, assigned, actioned and closed out as appropriate. Where relevant, any issues or complaints raised that result in a learning should be fed into the Continual Improvement process (as per the **SHE Way Improvement Specification chapter**).

# DOCUMENTED INFORMATION



## Why?

Anglo American businesses and operations must establish, document, implement and maintain systems to control the documented information necessary to support the effectiveness of the SHE management system and fulfilment of compliance obligations.

Documented information is integral to the demonstration of SHE management system implementation and adequacy and pertains to both internal and externally sourced information.



## How?

→ Each Anglo American business or operation must establish, document, implement and maintain a system(s) to control the documented information necessary to support the effectiveness of the SHE management system and fulfilment of compliance obligations. This should align and integrate with the operation's document management approach.

→ Isometrix supports the requirements of documented information to ensure that documented information is created, updated, protected, controlled, stored, and archived appropriately and in accordance with the **SHE Way**. The manner and the period in which the documentation is stored must be consistent with the local legal and compliance obligation requirements.

→ When creating and updating documented information, the following needs to be in place:

- Identification and description (e.g. a title, date, version author or reference number)
- Format (e.g. language, software version, graphics) and media (e.g. paper, electronic)
- Review and approval for suitability and adequacy.

→ The responsibility for controlling the documented information required by SHE management system must be clearly assigned at each site to ensure that it is available and suitable for use, where and when it is needed; and is adequately protected (e.g. from loss of confidentiality).

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# DOCUMENTED INFORMATION



## How?

→ The responsible person must address the following activities:

- Distribution, access, retrieval and use
- Storage and preservation, including legibility
- Control of changes (e.g. version control and approval)
- Retention and disposition (all documents must be retained for a minimum period prescribed by local legislation)
- Reporting on document retention and compliance with the local legal and regulatory obligations on document management.

→ Every member of Anglo America staff holds responsibility to comply with documented information requirements, and specifically ensure that any documents that they create or own are:

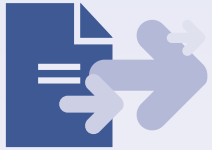
- Maintained, periodically reviewed and approved for adequacy and accuracy by authorised personnel to ensure that it is appropriate and understandable
- Available, understandable and legible, and suitable for use, where and when they are needed
- Adequately protected and preserved (e.g. from loss of confidentiality, improper use, or loss of integrity)
- Stored on the appropriate platform and format
- Adhere to data protection and other such legal requirements.

### NOTE: Workers data:

- Any worker personal data must be securely stored in a data management system (protected by medical confidentiality in case of health data), where it can be readily located and retrieved
- Data shall be retained for a minimum of 30 years and responsible custodians shall be assigned to oversee the data management system
- Workers must have access to their personal information regarding accidents, dangerous occurrences, inspections, investigations, remedial actions, health surveillance and medical examinations.



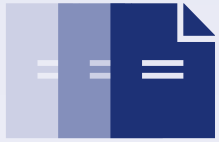




# WHAT IS THE OUTPUT OF SUPPORT?

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 SUPPORT FIT INTO THE REST OF THE SHE WAY?

