"Our policies guide us to do the right thing."
Mark Cutifani
Chief Executive

CHOOSE TO DO THE RIGHT THING

GROUP SAFETY, HEALTH AND ENVIRONMENT (SHE) POLICY

v.1

Valid from: 26/05/2020
Next review: 26/05/2021
Policy owner: Group Director – Technical

AngloAmerican

Real Mining. Real people. Real difference.

Context:

At Anglo American our Purpose is to re-imagine mining to improve people's lives. Inbuilt in our Purpose and the Sustainable Mining Plan ("SMP") is an unwavering commitment to achieve excellence in Safety, Health & Environmental ("SHE") management.

This Policy describes how the management of SHE applies to everyone in Anglo American, to help us achieve our Purpose and the SMP.

The Policy is underpinned by our principles of a Zero Mindset, No Repeats and Simple Non-negotiable Standards, and a positive culture in which SHE is embedded in our Values and Code of Conduct through relationships built on care and trusting each other to deliver.

Our management of SHE is scalable and integrated into the whole lifecycle of our activities for all managed operations, projects, offices and support activities, including how we work with our contractors and suppliers. For managed operations, this includes full integration and alignment with the Anglo American Operating Model ("AAOM").

For ease of reading we use generic language in describing the Group, and this is further explained under "Terms" at the end of this document.

The SHE Way Standard

The Policy is aligned to ISO 45001:2018 and 14001:2015 and it is enabled through the SHE Way Standard and supporting Safety & Sustainable Development (S&SD) Standards, which are part of our SMP Critical Foundations. The SHE Way defines our management system framework. The intended outcomes of applying the SHE Way are to ensure the fulfilment of our SHE compliance obligations, the appropriate control of SHE-related risks and opportunities, continual SHE performance improvements, and the achievement of SHE objectives.

Does this apply to me?

This Policy applies to all Anglo American managed businesses, managed operations and physical locations (including sites, projects, offices, facilities and outlets). It includes those that might be in a process of being divested or closed.

It applies to all employees and directors, as well as contractors, suppliers, consultants and external advisers who should be required to comply with the Policy when they act on behalf of Anglo American.

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. It is intended to work in tandem with local legal and regulatory requirements, and international standards. The Policy sets out minimum standards only and business or site management are responsible for the day-to-day implementation, oversight monitoring and reporting within their

specific businesses of the Policy, and related procedures and standards, and adapting where necessary and appropriate to reflect local conditions and legal requirements. Any changes required to ensure compliance with local legal requirements will be promptly notified to the Group Head of S&SD.

Where Anglo American does not manage a site, but it is associated with a site through a business relationship (such as a joint venture or other business partnership), it will seek to influence the relevant site to adopt a SHE framework commensurate with the requirements of this Policy and, at a minimum, to comply with local laws and requirements.

What do I need to know?

We commit to a high performance and purpose-led culture in which everyone demonstrates strong leadership. By doing so, we work together to maintain a safe workplace, a healthy environment, and to build and maintain thriving communities everywhere we work. These three areas are key goals of the SMP.

SHE Principles

The following principles guide our approach to SHE management:

- **Zero Mindset** – We shall apply the hierarchy of eliminating, avoiding, minimising, mitigating, remediating / rehabilitating and offsetting the SHE impacts and risks arising from our activities, products and services.
- **No Repeats** – All necessary steps will be taken to learn from SHE incidents, audit findings and other non-conformances to prevent their reoccurrence.
- **Simple Non-negotiable Standards** – Common non-negotiable Group and SHE management, performance standards and procedures shall be applied throughout the Group as a minimum requirement.

The management of SHE is Embedded into How we Work

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

- **Leadership** – We expect everyone to demonstrate excellent SHE leadership. We make the safety and health of our people and those who work for us, and responsible environmental stewardship, integral to achieving our objectives.
- **Integration** – We integrate SHE management into all operational activities, including through the AAOM. By doing so, we integrate our commitments on safety, physical health and well-being, responsible management of biodiversity, and minimising environmental harm into how we work.
- **Implementation** – We develop and embed long-term and sustainable SHE strategies in a lifecycle approach, including closure of operations, to deliver on the Critical Foundations and Stretch Goals of our SMP. We apply the SHE Way management system framework and associated technical standards in our management of SHE. We identify, assess, prioritise, manage, and reduce or eliminate SHE-related risks, and we implement the opportunities we identify.

- **Governance & 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. We uphold the highest performance best practices everywhere we operate.
- **Continuous Improvement** – We measure and analyse performance to improve our systems and management of SHE, and contribute towards 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.

What do I need to do?

Everyone who works for Anglo American

Being accountable for our actions is integral to how we work. By holding each other to account, we uphold our principles and carry out the following:

- **Leadership** – We apply our leadership culture to ensure SHE 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** – SHE requirements must be integrated into how all operational activities are designed, approved, planned, procured, scheduled, resourced and executed.
- **Implementation** – SHE risks and opportunities must be actively and continuously identified, assessed and managed. Controls and actions to manage SHE must be identified, prioritised and implemented. We must continuously monitor performance.
- **Governance & Compliance** – We must know the specific performance requirements that are expected of us. All concerns about SHE compliance must be raised and discussed with a manager or the SHE team.
- **Continuous Improvement** – We are all expected to 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.

Business Leaders, General Managers, Functional Managers and Supervisors

Business Leaders, General Managers, Functional Managers and Supervisors must also ensure the following:

- **Leadership** – The work environment must demonstrate trust and transparency, so that people can live our values. We must ensure our accountability framework is clearly understood by everyone who works for Anglo American, and that it is applied fairly and consistently.
- **Integration** – Our management system for SHE must be integrated into all operational activities. All teams (including contractors and suppliers) must know the SHE standards and procedures they have to follow, and ensure they have the right skills, training and knowledge for the activities they undertake.

- **Implementation** – The right resources to manage SHE must be in place. Progress must be monitored to ensure objectives are being achieved, and that this Policy is being implemented and complied with. When seeking SHE support, all requests for SHE expertise must be approved by the SHE team.
- **Governance & Compliance** – There must be a rigorous governance plan to act upon, monitor and proactively report on all compliance obligations and conditions.
- **Continuous Improvement** – Forums for workforce consultation, participation and engagement (including with workforce representatives, where relevant) must be in place. We must act on approved improvement opportunities.

Group Management

- The Group Director – Technical is accountable to the Anglo American Board of Directors for this Policy.
- Group Functional and Business Unit Heads are accountable for the implementation of this Policy and monitoring adherence to its requirements in their part of the Group.
- Group S&SD shall set SHE standards that support this Policy, our Purpose, are inclusive and integrated, and drive excellence.

Monitoring and Reporting

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

The Group Head of Safety and Group Head of Sustainable Development is responsible for informing the Group Director – Technical 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

Local Business Leaders, General Managers and Functional Managers, are required to ensure an effective "Three Lines of Defence" model is implemented in accordance with the following framework:

- **1st Line of Defence:** General Managers and local Business Unit Leaders are responsible for the identification, assessment and management of risks associated with this Policy. General Managers and local Business Unit Leaders are responsible for setting up of effective control measures in operational processes.
- **2nd Line of Defence:** Group S&SD (local, regional or global representatives) facilitate and monitor the implementation of an effective risk management programme by Business Units and Group Functions and to support the Business Units and Group Functions in ensuring consistent and effective reporting of SHE risk-related information throughout the Group.
- **3rd Line of Defence:** ABAS provide assurance, applying a risk-based approach, to relevant Group company boards and senior management.

It is a requirement that external assurance providers be commissioned to perform additional work, as appropriate, related to risks associated with this Policy, including the certification of ISO standards 45001 and 14001.

Further Information

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

Terms used in the Policy

Term	Explanation

"Anglo American", the "Anglo American Group", the "Group", "we", "us", and "our"	In this document 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 herein 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 licences 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.
ABAS	Anglo American Business Assurance Services, acting through the local, regional or global representatives as appropriate.
Anglo American Operating Model (AAOM) [2]	The Anglo American Operating Model (AAOM) is our structured approach for how we set targets, plan, execute and improve our work.

Audit [1]	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled. NOTE 1 Internal audits, sometimes called first party audits, are conducted by the organization itself, or on its behalf, for management review and other internal purposes (e.g. to confirm the effectiveness of the management system or to obtain information for the improvement of the management system). Internal audits can form the basis for an organization's self-declaration of conformity. In many cases, particularly in small organizations, independence can be demonstrated by the freedom from responsibility for the activity being audited or freedom from bias and conflict of interest. NOTE 2 External audits include second and third party audits. Second party audits are conducted by parties having an interest in the organization, such as customers, or by other persons on their behalf. Third party audits are conducted by independent auditing organizations, such as regulators or those providing certification.
Compliance Obligations [1]	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 [2]	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
Management System [1]	A management system is a set of interrelated or interacting elements of an organisation to establish policies and objectives and processes to achieve those objectives.
Managed Operation [2]	Physical operations that are managed by Anglo American including sites, projects, offices, facilities and outlets.

Risk [3]	Risk is the effect of uncertainty on objectives.
Risks and Opportunities [1]	Potential adverse effects (threats) and potential beneficial effects (opportunities).
Stretch Goals [2]	Ambitious Groups level goals set out in our Sustainable Mining Plan.
Sustainable Mining Plan [2]	The Sustainable Mining Plan is part of FutureSmart Mining TM. It is a set of deliberately ambitious stretch goals to be achieved by 2030 alongside milestones in 2020 and 2025. These goals are underpinned by six critical foundations that are enabled by partnership and engagement. Collaborative Regional Development (CRD) is central to the approach and aims to stimulate socio-economic development both inside and outside the mining value chain.
The SHE Way [2]	The Anglo American management system framework that describes our systematic approach to the management of SHE-related risks and opportunities and how this integrates with our business processes.
YourVoice [2]	YourVoice is a confidential channel that enables stakeholders to report behaviour that may conflict with our Values and Code of Conduct, without fear of retaliation.

1 Source: ISO 45001: 2018 and ISO 14001:2015 – terms and definitions
2 Source: Anglo American term
3 Source: Anglo American Group Integrated Risk Management Policy and ISO 31000:2018

Internal references

The Policy is aligned with Group Policies including those for the Social Way, Water, Climate Change, Integrated Risk Management, Resilience, Human Rights, International & Government Relations, and Bullying, Harassment & Victimisation, Bribery & Corruption, Business Integrity, Information Security, Whistleblowing and Resilience. Refer to the Policy Hub for related Group Policies described in this Policy.

Reference Standards and Frameworks:

- The SHE Way
- SHE Leadership Practices Framework
- Learning from Incidents Standard
- Contractor Performance Management Standard
- The Anglo American Operating Model
- Group Data Privacy policy
- The Social Way
- Group Code of Conduct
- Emergency Preparedness and Response Standard
- Operational Risk Management Standard

- Sustainable Mining Plan
- YourVoice

External References

- ISO 45001:2018 (Occupational health & safety management systems – Requirements with guidance for use)
- ISO 14001:2015 (Environmental management systems – Requirements with guidance for use)

Note: access to external references can be obtained through the Technical Library. For further information, contact Group Safety and Sustainable Development.

Revision History

Policy governance commitment:

Approval date by PGC:	**24 April 2020**
Approval by CorpCo:	**23 July 2020**

Document Control

Frequency of Policy review after date of issue:	The SHE Policy will be reviewed at least **annually** to ensure that it remains current and valid.

If this Policy has one or more approved waivers in place:

No.	N/A
Waiver applies to	N/A
Waiver in place from	N/A
Expiration of waiver	N/A
Date waiver approved	N/A

The following changes have been made since this document was previously issued:

Old Policy name, date, and version number:	**N/A – new Group Policy**
Main changes made:	N/A – new Group Policy