

THE ANGLO AMERICAN SAFETY WAY

Safety Management System Standards







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INTRODUCTION

Anglo American plc owns and operates a wide range of businesses which, by virtue of their size, diversity of operations and geographical locations, pose significant safety, health and environmental challenges.

The overall conduct of Anglo American businesses, and the values and standards which guide us, are set out in, "Good Citizenship: Our Business Principles".

Anglo American has developed the Anglo American Safety Framework¹ which shows how all the tools that we use to manage safety are inter-related. These tools include the Anglo American Safety Principles² and the Anglo American Safety Way Safety Management System Standards³. These have been developed through a process of internal and external consultation and collaboration.

Our Chief Executive's commitment to the Anglo American Safety Way has been clearly articulated and the Anglo American Executive Committee has endorsed and committed to the implementation of the Safety Standards. The Anglo American Board of directors seeks assurance of compliance to the Anglo American Safety Way through regular self-assessments, peer reviews and third-party audits.

¹ Referred to hereafter as the Safety Framework.

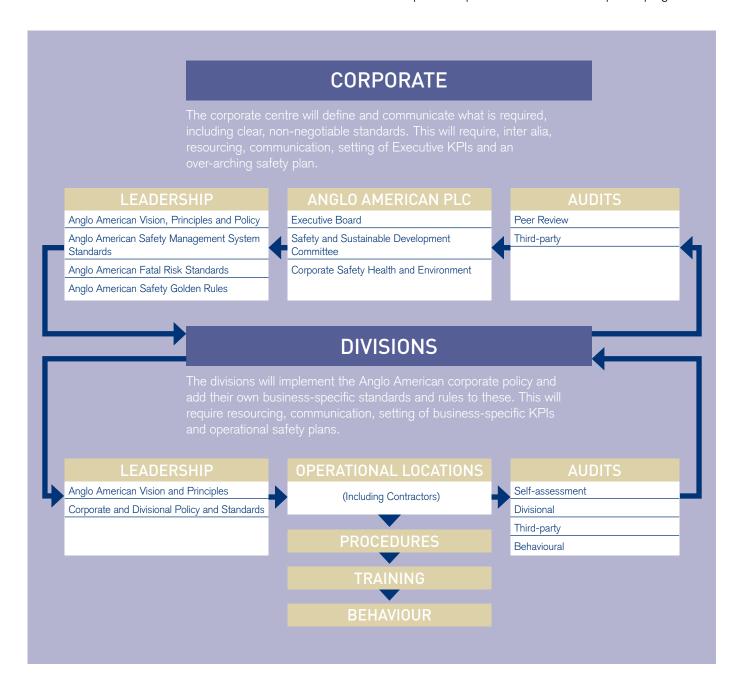
² Referred to hereafter as the Safety Principles.

³ Referred to hereafter as the Safety Standards.

ANGLO AMERICAN SAFETY FRAMEWORK

The Safety Framework defines the roles and responsibilities of the corporate centre and divisional organisations on the journey towards Zero Harm.

- The corporate centre defines, communicates and reviews requirements in relation to the Vision, Leadership,
 Principles, Policy and Standards for safety.
- The divisional organisations implement and build the corporate requirements into business-specific programmes.



SAFETY IN ANGLO AMERICAN

OUR VISION

ZERO Harm

Our vision is to achieve Zero Harm through effective management of safety risks in all our managed operations.

We do not accept that it is necessary for people to be injured whilst working for us. All employees should be able to return home fit and well at the end of each shift. We believe that one injury is one too many.

OUR PRINCIPLES

Underpinning the Vision are three fundamental Safety Principles

ZERO Mindset

All injuries and occupational illnesses are preventable.

NO Repeats

All necessary steps are taken to learn from incidents in order to prevent recurrence.

SIMPLE Non-negotiable Standards

Safety standards and rules are consistently applied throughout the Group.

OUR POLICY



Mark Cutifani

Chief executive, Anglo American plc

We hold our leaders accountable for the safety of our people

We expect our managers and supervisors to provide effective leadership in safety whilst recognising good safety behaviour is the responsibility of all those who work for us.

Management of every business or operation is responsible for the full implementation of our safety management system (the Anglo American Safety Way), the Fatal Risk Standards and the Golden Rules. This requires the allocation of appropriate resources and the provision of training, education, consultation and auditing to ensure compliance.

We commit to open communication with our employees, contractors, suppliers and other business partners and interested third parties to encourage a safety culture that reflects the intent of this policy.

We will set appropriate objectives and monitor progress against these to ensure continual improvement towards our goal.



MONITORING AND REVIEW

VISIBLE FELT LEADERSHIP

Executives and senior management must lead by example, adopt a Zero Harm mindset and demonstrate the desired visible leadership behaviours that will drive continual improvement in safety performance. Management must set non-negotiable, high standards for safety, actively engage with the workforce and correct unsafe behaviours or situations. Particular emphasis is needed to ensure that lessons are learned from incidents and that all necessary actions are taken to prevent repeats. Management at all levels in the organisation has a responsibility to abide by these Principles. They must be embraced and embedded into the organisation and, as leaders, management must demonstrate the Anglo American Safety Way and relentlessly pursue the development of a safety culture which reflects our Vision and Safety Principles.

CORPORATE PEER REVIEW PROGRAMME

Anglo American has a number of mechanisms which are used to monitor and review safety performance across the organisation. The types of audits and reviews conducted are determined primarily by the risk profile of the businesses. The time scales over which these processes are conducted are set to allow maximum insight into the performance of the risk control measures in place.

The Peer Review Programme (PRP) has been developed and endorsed by the Executive Committee as a key means of assurance that fundamentally sound, risk-based management systems are in place at all operations. Furthermore, the PRP assists in building core competence and acts as a catalyst for learning and sharing across the Anglo American Group. All divisions shall participate in the three-year PRP and provide suitable and sufficient resources to ensure its success. Management shall be responsible for implementing actions arising from the PRP.

SELF-ASSESSMENT AND SAFETY PLANS

Key to the successful implementation of the Anglo American Safety Way, and in keeping with the principle of continuous improvement, is the requirement for businesses and operations to carry out annual self-assessments of the extent to which all the elements of the Safety Standards have been implemented. The gaps between full compliance/implementation and the self-assessed reality will provide a focus for annual safety improvement plans. Reporting on these self-assessments will form part of the assurance process required by the Anglo American plc Executive Committee.

ANGLO AMERICAN SAFETY WAY STANDARDS

BACKGROUND

The twelve Safety Standards form the basis for the development, enhancement and application of comprehensive, integrated safety management systems throughout our operations. The Safety Standards have been developed from existing Anglo American standards, industry best practice and from internationally recognised safety management system standards, such as OHSAS18001.



OBJECTIVES

The objectives of the Safety Standards are to:

- Support the realisation of the Safety Vision and the implementation of the Safety Principles and the Safety Policy.
- Provide (or support) a framework for a risk-based approach to safety management which will align with Anglo American's Integrated Risk Management Process. Furthermore, they will support the Safety Management System.
- Set out and formalise the expectations for progressive development and implementation of more specific and detailed safety management systems at all levels of Anglo American.
- Provide clear, auditable criteria against which safety management systems can be assessed across all Anglo American operations.
- Align performance with Anglo American's Business Principles.
- Provide a basis from which to drive continual improvement towards leading industrial practice.

APPLICATION

These Safety Standards have been endorsed by the Executive Committee.

They are mandatory and apply to all activities in Anglo American managed businesses and operations.

The Safety Standards shall be applied to mergers and acquisitions to assist in the identification of potential safety risks and liabilities associated with businesses prior to them becoming part of Anglo American.

They will apply to all operations, regardless of whether they are being prepared for disposal.

Where no formal safety management system exists, these Safety Standards shall provide the basis for the development and implementation of a suitable management system. Where formal safety management systems do exist, the Safety Standards shall be used as a benchmark to assess the suitability of the existing management system. Where the latter is deficient, the Safety Standards shall be applied.

These Safety Standards shall be made available to independently managed operations via our representatives on the relevant Boards and to joint ventures, to encourage their application and improvement in safety management.

SCOPE

The scope of these Safety Standards covers all operational activities that have the potential to affect the safety of employees and contractors. These Safety Standards cover the entire life cycle of operations from exploration and planning through to operation, closure and post-closure activities (decommissioning, remediation and rehabilitation).

MANAGEMENT REVIEW

These Safety Standards will be reviewed periodically to ensure that they remain current and valid.

ANGLO AMERICAN SAFETY MANAGEMENT SYSTEM STANDARDS

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POLICY, LEADERSHIP AND COMMITMENT

Management shall demonstrate leadership and commitment to safety in line with Anglo American's Vision of Zero Harm.

- 1.1 Anglo American and its businesses and operations shall maintain a safety policy that is appropriate to the nature and scale of its activities. The Anglo American Executive Committee endorses the safety policy and will review it regularly to ensure it remains current and relevant. The safety policy is available to all relevant stakeholders.
- 1.2 Senior management at each Anglo American business or operation shall be accountable for establishing and maintaining a local safety policy and a safety management system that, as a minimum, shall reflect the Anglo American Vision and Principles. The policy and safety management system shall be consistent with the requirements of internationally recognised safety management system standards such as OHSAS 18001.
- 1.3 Each Anglo American business or operation shall have clearly defined roles, responsibilities and accountability at all levels and functions within the organisation to ensure the effective implementation of the safety management system. These shall be defined, documented and communicated to all appropriate personnel.
- 1.4 Each Anglo American business or operation shall appoint a member of management with specific responsibility for ensuring the effective implementation of the safety policy and the safety management system at all levels.
- 1.5 Each Anglo American business or operation shall make available adequate resources (human, technical and financial) to ensure the effective implementation and maintenance of the safety management system. This shall include the use of appropriate, competent safety advice.
- 1.6 Executives and management at each Anglo American business or operation shall be ultimately accountable for safety. In keeping with the Vision of Zero Harm, they shall have a clear responsibility to set priorities for safety and to ensure processes are in place to deliver continual improvement.
- 1.7 Performance contracts shall formally define safety accountabilities and responsibilities of senior executives and senior management at each Anglo American business or operation.
- 1.8 Executives, management, personnel and contractors at each Anglo American business or operation shall demonstrate a clear understanding of the need to comply with corporate and site-specific

- safety standards and of the consequences of non-compliance. This shall include their commitment to Zero Harm and the Safety Principles by preventing and/or correcting unsafe behaviours and work conditions.
- 1.9 Executives, management and first-line supervisors at each Anglo American business or operation shall demonstrate visibly their commitment to safety by participating in safety programmes, audits and reviews to ensure that the corporate and site-specific safety standards are embedded in workforce behaviours. This shall include engaging with personnel and contractors, leading by example, the use of behavioural observation techniques and the demonstration of effective visible felt leadership.
- 1.10 Executives and managers at each Anglo American business or operation shall adopt formal processes that recognise, reinforce and reward desired safety outcomes.
- 1.11 Executives, managers, personnel and contractors at each Anglo American business or operation shall demonstrate their understanding of their responsibility to refuse to allow work to be undertaken or continued where conflict exists between safety and other business priorities.
- 1.12 Senior management at each Anglo American business or operation shall review, on a periodic basis, the safety policy and associated systems to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.



RISK AND CHANGE MANAGEMENT

Hazards shall be proactively identified, risk-assessed and appropriately managed on an ongoing basis. Assessment processes shall include changes to operations, processes, personnel and routine and non-routine activities.

- 2.1 Anglo American and its businesses and operations shall establish and maintain formal systems and processes for the ongoing identification of safety hazards and the assessment of risks. These systems and processes shall be developed through consultation with appropriate competent personnel.
- 2.2 At each Anglo American business or operation, risk assessments shall be undertaken, reviewed and authorised by competent persons prior to work activities commencing.
- 2.3 The risk assessment process shall consider and be applied to the full life cycle of the operation or activity. As a minimum, the risk assessment process shall consider and be applied to routine and non-routine activities, products, procedures and services, planned or unplanned changes, all personnel, contractors, business partners, suppliers and visitors, operating procedures, work organisation, and all equipment and facilities.
- 2.4 The risk assessment process and methodologies shall be appropriate to the nature and scale of the risks (e.g. qualitative or quantitative, HAZOP, SQRA, etc) and shall be undertaken by competent personnel.
- 2.5 Each Anglo American business or operation shall implement appropriate control measures (including measures to prevent escalation to catastrophic events) to ensure that safety risks are managed to a tolerable level through the effective use of the hierarchy of risk controls. These shall be reviewed periodically to ensure they remain appropriate to the nature and extent of the risks.

- 2.6 The risk assessment process shall be documented and consistent with the requirements of internationally recognised safety management system standards.
- 2.7 Each Anglo American business or operation shall ensure that the results of the risk assessment processes are fully communicated to all relevant personnel and considered when establishing training, awareness and competency requirements.
- 2.8 Each Anglo American business or operation shall ensure that a formal management of change programme is developed, implemented and maintained by competent personnel to manage risks associated with planned or unplanned, permanent, temporary or incremental changes.
- 2.9 At each Anglo American business or operation, the content of the change management programme shall be appropriate to the nature and extent of the associated risks and the programme shall, as a minimum, consider changes in duration, personnel, organisation, activities, processes, facilities, equipment, procedures, laws, standards, materials, products, systems and services.
- **2.10** Management at each Anglo American business or operation shall ensure that competent personnel are consulted on, evaluate and authorise all changes.
- 2.11 Formal systems shall be in place at each Anglo American business or operation to ensure that the consequences of any changes are effectively communicated to and understood by all relevant personnel, and to ensure the effective tracking of all changes, including updating of all appropriate documentation and risk assessments.
- 2.12 Each Anglo American business or operation shall maintain an up-to-date risk register, which contains the significant risks for the site. This shall be maintained, updated and reviewed at least annually or when circumstances or events change the risk profile of the business or operation.
- 2.13 Senior management at each Anglo American business or operation shall review, on a periodic basis, the risk and change management systems and processes to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.

LEGAL AND OTHER REQUIREMENTS

Anglo American and its businesses and operations shall ensure that applicable legal, regulatory and other safety requirements are identified, documented, maintained, accessible, communicated, understood and complied with.

- 3.1 Each Anglo American business or operation shall have a formal system for accessing the most current legal, regulatory and other requirements relevant to safety.
- 3.2 Each Anglo American business or operation shall have, or have access to, competent people for the interpretation and application of all legal, regulatory and other requirements relevant to safety.
- 3.3 Each Anglo American business or operation shall have formal systems in place to ensure that information relevant to safety is effectively and proactively communicated to all applicable personnel to ensure that the legal, regulatory and other requirements are understood.
- 3.4 Each Anglo American business or operation shall maintain a formal register, which shall be reviewed at least annually, of its key legal, regulatory and other requirements relevant to safety.
- 3.5 Where local legal and regulatory requirements do not require an appropriate level of safety performance, all activities at Anglo American businesses and operations shall be conducted in a manner consistent with the Anglo American Safety Way, the Anglo American Fatal Risk Standards, the Anglo American Safety Golden Rules and other internationally recognised safety performance standards.



OBJECTIVES, TARGETS AND PERFORMANCE MANAGEMENT

Objectives and targets for safety shall be integrated into the overall business planning process and shall be deployed throughout Anglo American and its businesses and operations for the purposes of continuous improvement.

- 4.1 Each Anglo American business or operation shall establish formal, measurable and, where appropriate, quantified safety performance objectives and targets at all levels and functions. These shall be consistent with the vision of Zero Harm and the elements of the Safety Framework.
- 4.2 Objectives and targets shall reflect applicable legal, regulatory and other safety requirements and be consistent with the nature of the safety hazards and risks associated with the Anglo American businesses and operations.
- 4.3 Each Anglo American business or operation shall ensure specifically that, when establishing safety objectives and targets, the results of the risk assessment processes and the effects of the control measures are considered.
- 4.4 Each Anglo American business or operation shall have formal systems in place to ensure that safety objectives and targets are assigned, communicated to and understood by all appropriate personnel, including senior management, line management, employees and contractors.
- 4.5 Each Anglo American business or operation shall ensure that adequate resources (human, technical and financial) are made available and deployed to ensure the safety objectives and targets are met.

- 4.6 Each Anglo American business or operation shall ensure that all relevant personnel and contractors understand the safety objectives and targets and ensure that safety obligations are incorporated into their agreements.
- 4.7 Each Anglo American business or operation shall ensure that there are formal processes in place to allow effective two-way communication and consultation on the establishment of safety objectives and targets.
- 4.8 Each Anglo American business or operation shall ensure that there are formal responsibilities and processes in place to monitor progress towards meeting the safety objectives and targets.
- 4.9 Safety shall be a priority for management at each Anglo American business or operation, and safety objectives and targets shall be factored in to their performance contracts.
- 4.10 Each Anglo American business or operation shall develop formal annual safety plans which will incorporate information resulting from the audit programme, management review, incidents, accidents and relevant safety information from across the Anglo American Group.
- 4.11 Senior management at each Anglo American business or operation shall review, on a periodic basis, the safety objectives and targets to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.



TRAINING, AWARENESS AND COMPETENCE

All personnel and contractors at each Anglo American business or operation shall be competent to perform their activities safely.

- 5.1 Each Anglo American business or operation shall have formal systems in place to ensure that all personnel and contractors are competent to perform their activities safely when engaged at Anglo American managed operations or where they are acting on behalf of Anglo American operations.
- 5.2 Management at each Anglo American business or operation shall be accountable for developing and implementing formal training, awareness and competence programmes, which are applicable to all relevant levels and functions.
- 5.3 Each Anglo American business or operation shall ensure that management and all relevant personnel receive regular training and coaching in hazard identification, risk assessment and control of all hazards in their workplace or areas of responsibility. Line managers shall be accountable for the development, implementation and monitoring of the effectiveness of this training.
- 5.4 Each Anglo American business or operation shall ensure that all organisational roles, positions and job functions have the required safety competencies formally defined in terms of appropriate education, training and experience.
- 5.5 At each Anglo American business or operation, additional general and specific training needs, including refresher training, shall be identified, prioritised and delivered to ensure that relevant personnel and contractors are competent before activities are undertaken. Training records for personnel and contractors shall be documented, readily accessible and maintained in a suitable medium.
- 5.6 At each Anglo American business or operation, training shall take into consideration all changes to the operations and personnel that may have an impact on safety. Specifically, issues such as return from leave or other absence, or when roles change, shall be considered.
- 5.7 At each Anglo American business or operation, training programmes shall consider the results of the risk assessment and change management programmes.

- **5.8** Each Anglo American business or operation shall ensure that recruitment and selection policies specifically consider the safety training, awareness and competencies of all relevant personnel prior to deployment in the workplace.
- 5.9 Each Anglo American business or operation shall ensure that training programmes take into consideration the cultural and educational diversity of the workforce and the varying levels of responsibility, ability and workplace risk. Where appropriate, the programmes shall be adapted to account for these considerations and reviewed for effectiveness. Training shall be delivered in an effective and appropriate medium.
- 5.10 Each Anglo American business or operation shall ensure that management is trained in effective visible felt leadership techniques that reinforce desired behaviours and correct at risk behaviours in the workplace.
- 5.11 Each Anglo American business or operation shall ensure that the formal induction programme for personnel, contractors and visitors includes aspects relating to safety hazards, risks and control measures. This induction programme shall be appropriate to the nature and scale of the hazards and risks associated with the operations and site-specific requirements. The level of understanding by the participants in the induction programme shall be evaluated.
- 5.12 Senior management at each Anglo American business or operation shall review, on a periodic basis, the training, awareness and competence systems and processes to ensure that they remain relevant and appropriate to the nature of the associated risks.



COMMUNICATION, CONSULTATION AND PARTICIPATION

Anglo American and its businesses and operations shall communicate and consult proactively with all appropriate personnel, contractors, suppliers and visitors regarding safety.

- 6.1 Each Anglo American business or operation shall develop and implement formal processes to ensure effective communication, consultation and participation relating to safety at all levels and functions. The consultation and participation processes shall be interactive, allowing for two-way dialogue. The processes shall involve all appropriate personnel, contractors and suppliers and shall include the communication of the Anglo American Safety Principles to visitors.
- 6.2 Each Anglo American business or operation shall establish and maintain effective and appropriate discussion forums at all levels for regular communication and consultation relating to safety. These forums shall involve all relevant personnel and shall be used as a mechanism to track, monitor and report on the effectiveness of current safety systems and performance.
- 6.3 Each Anglo American business or operation shall formally define and communicate the arrangements for personnel safety representation (e.g. on safety committees).

- 6.4 Each Anglo American business or operation shall ensure that the communication, consultation and participation programmes take into consideration the cultural and educational diversity of the workforce, varying levels of responsibility, ability and workplace risk. Where appropriate, the programmes shall be adapted to account for these considerations and reviewed for effectiveness. Communication shall be delivered in an effective and appropriate medium.
- 6.5 Each Anglo American business or operation shall develop and implement formal processes to allow for the sharing of lessons learned, good practices and opportunities for improvement. The processes shall also include the sharing of information with other sites, businesses and the wider Anglo American Group.
- 6.6 Senior management at each Anglo American business or operation shall review, on a periodic basis, the communication, consultation and participation processes to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.



DOCUMENTATION AND CONTROL OF DOCUMENTS

All information required to control safety risks shall be identifiable, readily available and, where appropriate, controlled.

- 7.1 Each Anglo American business or operation shall implement and maintain a system for the control of documentation and data necessary for the effective management of a risk-based approach to safety.
- 7.2 The document control system at each Anglo American business or operation shall include a current document outlining the core elements of the safety management system and their interactions, including direction to related documents.
- 7.3 The document control system shall ensure that current versions of documents relevant to the effective management of safety (drawings, vendor specifications, equipment manuals, material data sheets, etc.) are available, maintained and reviewed, on a periodic basis, for adequacy and accuracy by authorised personnel and are legible and understandable.
- 7.4 The document control system shall ensure that documents from external sources necessary for the planning and operation of the safety management system are registered, current and available in a suitable format, either paper or electronic.

- 7.5 The document control system shall ensure that safety records are identified with revision dates indicated, securely stored, readily located and retrievable, accurate and legible, that they have established retention times based on legal requirements and/or knowledge preservation considerations, and that responsible custodians are assigned to the care and control of these.
- 7.6 The document control system shall ensure that all confidential records, including medical, personnel, legal and other, are controlled and maintained securely.
- 7.7 The document control system shall ensure that obsolete documents and data shall be identified, removed and protected from unauthorised use.
- 7.8 The document control system shall ensure that a register of archived documents and data, retained for legal purposes or the preservation of knowledge, is kept and maintained securely.



OPERATIONAL CONTROL

Anglo American and its businesses and operations shall apply appropriate control measures for the effective management of hazards and risks arising from processes and activities.

- 8.1 Each Anglo American business or operation shall identify and plan for those processes and activities that require control measures to be applied, based on the results of risk assessments. The operational controls shall be consistent with the nature and extent of the hazards and risks identified.
- 8.2 At each Anglo American business or operation, formal control measures for all relevant processes, products, services and activities, including maintenance, shall be established, implemented and maintained by relevant competent personnel and approved by senior management.
- 8.3 Control measures at each Anglo American business or operation shall be based on the results of risk assessments and shall be consistent with the nature and extent of the associated risks. Where appropriate, these shall include reference to design data and operating limits. The control measures shall include documented systems and procedures, where appropriate, and shall be implemented following the principles of the hierarchy of control.
- 8.4 At each Anglo American business or operation, relevant control measures, including procedures and other documented requirements, shall be communicated clearly to all relevant personnel, contractors and suppliers.
- 8.5 At each Anglo American business or operation, systems, procedures and work practices shall be formally reviewed on a periodic basis and/or following an event or incident to ensure that they continue to be applicable, relevant and effective in controlling the risks for which they were developed and intended. The results of these reviews shall be used for continual improvement and discussed with all appropriate personnel.
- **8.6** Each Anglo American business or operation shall ensure that all relevant personnel receive training in and understand the controls, operational parameters and procedures, and the maintenance requirements that are in place to manage the safety risks.

- 8.7 Each Anglo American business or operation shall ensure that formal maintenance and inspection programmes are established, implemented and maintained to ensure the ongoing integrity of the facility, work equipment and safety-critical devices. The programmes shall include inspection, testing, calibration and certification at intervals determined by the level and nature of the risk and manufacturers' requirements.
- 8.8 Systems shall be in place at each Anglo American business or operation to test and maintain the availability and effectiveness of protective systems and devices.
- 8.9 Facility design, construction and maintenance activities at each Anglo American business or operation shall take into account sound engineering practices consistent with national, international or Anglo American codes and standards, whichever are the more stringent.
- 8.10 Each Anglo American business or operation shall ensure that programmes are in place to ensure that personnel in critical jobs are fit for duty and are not compromised by external influences, including alcohol and drug abuse.
- 8.11 Senior management at each Anglo American business or operation shall review, on a periodic basis, the operational control systems, measures and processes to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.



EMERGENCY PREPAREDNESS AND RESPONSE

Anglo American and its businesses and operations shall identify, prepare for and have the capability to respond appropriately to emergency and crisis situations.

- 9.1 Each Anglo American business or operation shall identify, assess and document all potential emergency and crisis situations and their impacts. This shall include neighbours and potential off-site emergency and crisis situations (e.g. employees performing work away from a fixed site, transport of personnel, transport of hazardous materials, etc.).
- 9.2 At each Anglo American business or operation, assessments shall be undertaken by competent personnel using methodologies appropriate to the nature and scale of the risk and the potential identified emergency and crisis situations.
- 9.3 Each Anglo American business or operation shall develop and implement plans to respond to the identified emergency and crisis situations. These plans shall outline measures for the prevention and mitigation of illnesses and injuries arising from the emergency and crisis situations. The plans shall be aligned with the Anglo American Crisis Communication Plan.
- 9.4 Each Anglo American business or operation shall ensure that, when developing these plans, they consider, as a minimum, the nature and scale of the business or operation, the results of risk assessments and control measures, worst-case scenarios, the availability and capability of local emergency services, details of any emergency response or consultation arrangements, legal and other requirements, the experiences of previous emergencies including those at similar organisations, best practice and the findings from emergency drills.
- 9.5 Each Anglo American business or operation shall identify the appropriate resources, both on and off site, to ensure the effective implementation of the emergency and crisis situation procedures. These resources shall include appropriate personnel, contractors, emergency services, organisations, equipment and warning devices necessary for emergency response. All equipment and warning devices shall be identified, maintained, tested and available.

- 9.6 Each Anglo American business or operation shall clearly define, document and communicate the roles and responsibilities of all appropriate personnel, legal advisors, contractors, emergency services and, where appropriate, external regulators associated with the implementation and execution of the emergency and crisis situation procedures.
- 9.7 Each Anglo American business or operation shall ensure that all relevant personnel, contractors and visitors are trained and competent to deal with the requirements of the emergency and crisis situation procedures and that they understand their respective roles and responsibilities.
- 9.8 Emergency response drills shall be conducted at each Anglo American business or operation to determine the effectiveness of the emergency and crisis situation procedures. Where appropriate, these shall include liaison with and the involvement of external response organisations. Lessons learned shall be documented and incorporated into revisions of the procedures.
- 9.9 The emergency response drills at each Anglo American business or operation shall include desk-based exercises and full evacuations. The type and frequency of the drills shall be determined on the basis of the nature and scale of operations and the nature and extent of the risks associated with the operations, and as defined in the emergency preparedness and response plans.
- 9.10 Each Anglo American business or operation shall formally review, document and amend emergency and crisis situation plans and procedures periodically, but at least on an annual basis and following any emergency or crisis situations, to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.



CONTRACTOR AND BUSINESS PARTNER MANAGEMENT

All contractors and business partners shall undertake their activities in accordance with legal, regulatory and other safety requirements including the elements of the Anglo American Safety Framework.

- 10.1 The scope and application of the management of contractors and business partners (C&BPs) shall include temporary activities, discrete projects of finite duration and those C&BPs engaged under contract to carry out specific short-, medium- and long-term tasks or services at Anglo American and its businesses and operations.
- 10.2 Anglo American and its businesses and operations shall have a formal contractor management system (CMS), appropriate to the nature and extent of the associated risks, the purpose of which is to ensure that all C&BPs undertake their activities in line with the elements of the Anglo American Safety Framework.
- 10.3 The CMS shall include the requirement for all C&BPs to be subjected to a risk-based evaluation prior to contractual arrangements being established. This evaluation shall consider the nature of their products, activities or services and their training, awareness, competence and previous safety performance.
- 10.4 The CMS shall include formal safety clauses in the contract to ensure that C&BPs comply with legal obligations and the elements of the Anglo American Safety Framework.
- 10.5 At each Anglo American business or operation, C&BPs shall be required to undertake risk assessments for all activities and develop safety plans as part of the contract conditions and prior to commencing any work. The safety plans relating to the activities of C&BPs shall include hazard identification and analysis, risk assessment, appropriate control measures, guidance on emergency response actions, monitoring and reporting of safety performance requirements to conform with the elements of the Anglo American Safety Framework.



- 10.6 The CMS shall contain clear and documented reporting relationships, lines of consultation and communication, roles, responsibilities, accountabilities and (where appropriate) system interfaces between C&BPs and the Anglo American business or operation.
- 10.7 Each Anglo American business or operation shall appoint specific representatives to act as focal points for the management and oversight of C&BPs. These representatives shall ensure that competent persons undertake periodic safety reviews/audits of the safety performance of C&BPs in accordance with the CMS.
- 10.8 All C&BPs shall report regularly on their safety performance to the appointed representatives at each Anglo American business or operation and, where appropriate, shall be involved in site meetings, reviews and incident investigations.
- 10.9 The CMS shall include instructions for the evaluation and risk assessment of equipment or materials prior to purchase, hire or lease, to ensure their suitability for use and to prevent the introduction of safety hazards and risks. These evaluations and risk assessments shall be performed by suitable and competent persons.
- 10.10 All C&BPs shall provide information to the Anglo American business or operation on the hazards and risks associated with their equipment, products and services prior to delivery or commencement of work and whenever changes occur.
- 10.11 Each Anglo American business or operation shall have a register of all C&BPs working on site. This register shall include documented information on their safety performance, from both a compliance and noncompliance perspective. Contracts shall include a right to terminate for poor safety performance.
- 10.12 The CMS shall ensure that the management of C&BPs regularly audit and review their operations at Anglo American businesses or operations for compliance with their own standards and the elements of the Anglo American Safety Framework.
- 10.13 Senior management at each Anglo American business or operation shall review, on a periodic basis, the CMS to ensure that it remains relevant and appropriate to the nature and extent of the associated risks.

INCIDENT REPORTING AND INVESTIGATION

All safety incidents, including near hits, shall be reported, investigated and analysed. Appropriate corrective and preventive actions shall be taken and closed out and the lessons shared.

Performance requirements

- 11.1 Each Anglo American business or operation shall have formal systems in place for the reporting, investigation, closure and communication of all near hits (including unsafe acts and conditions), incidents and non-conformances.
- 11.2 The incident reporting and investigation systems at each Anglo American business or operation shall define the methodology, responsibility and authority for the general handling and investigation of all near hits, incidents and non-conformances with the objective of establishing the fundamental root cause.
- 11.3 The incident reporting and investigation systems at each Anglo American business or operation shall include mechanisms to ensure that legal defences are not compromised during the initial and subsequent internal and external investigation processes.
- 11.4 The incident reporting and investigation systems at each Anglo American business or operation shall ensure that comprehensive and documented investigations are performed to identify and prioritise corrective and preventive actions to eliminate or reduce the risk and recurrence of near hits, incidents and non-conformances. These investigations shall specifically include root cause analysis.
- 11.5 At each Anglo American business or operation, the proposed corrective and preventive actions shall be reviewed through the risk assessment process prior to implementation to ensure these are appropriate to the nature and extent of the hazards and associated risks.
- 11.6 At each Anglo American business or operation, formal systems shall be in place to ensure that corrective and preventive actions, including changes in procedures, processes or existing systems, are documented, communicated, followed up and closed out. Confirmation of the effectiveness of corrective and preventive actions shall be undertaken and the lessons

shared.

- 11.7 In the event of a significant near hit, incident or accident at an Anglo American business or operation, work shall cease and only resume once the necessary actions, including reevaluation of any relevant risk assessments, have been undertaken to reduce the risk of recurrence. Work shall only be permitted to recommence following formal authorisation from appropriate senior management.
- 11.8 Each Anglo American business or operation shall ensure that, when significant risks and incidents are identified or occur, information shall be shared within the business or operation and with the Anglo American Group to allow risk assessment and preventive actions to be implemented in all similar workplaces, activities and operations.
- 11.9 Each Anglo American business or operation shall ensure that competent senior management authorises and participates in the investigative process to demonstrate that an appropriate review and assessment has been undertaken.
- **11.10** Each Anglo American business or operation shall report on appropriate safety indicators as determined by Anglo American.
- 11.11 Each Anglo American business or operation shall have a formal system of processing and implementing relevant information from Anglo American Safety Alerts.
- 11.12 Senior management at each Anglo American business or operation shall review, on a periodic basis, the incident reporting and investigation systems and processes to ensure that they remain relevant and appropriate to the nature and extent of the associated risks.

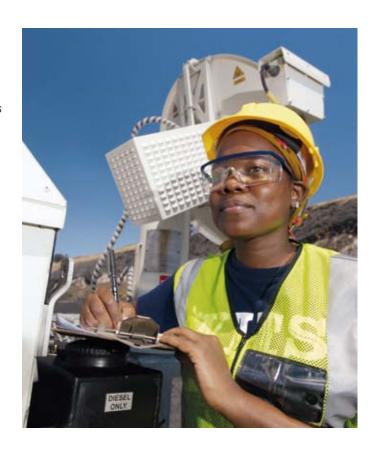


MONITORING, AUDITS AND REVIEWS

Anglo American and its businesses and operations shall ensure that safety performance, systems and equipment are monitored, audited and reviewed to identify trends, measure progress and assess compliance.

- 12.1 Each Anglo American business or operation shall establish programmes to monitor and measure safety performance, systems and equipment on a periodic basis. The criteria shall be consistent with internationally recognised safety management system standards such as OHSAS 18001.
- 12.2 Each Anglo American business or operation shall undertake a baseline audit and establish, document and maintain a formal annual audit programme that ensures the effective monitoring of conformance with the Anglo American Safety Way Safety Management System Standards, the Anglo American Fatal Risk Standards and other elements of the Anglo American Safety Framework.
- 12.3 The scope, frequency and methodology of the audit programme at each Anglo American business or operation shall be based on the results of risk assessments and the results of previous audits, and be appropriate to the nature and scale of the hazards and associated risks.
- 12.4 The audit programme at each Anglo American business or operation shall include details of the specific competencies, roles and responsibilities required for conducting audits and reporting results.
- 12.5 At each Anglo American business or operation, management shall be actively engaged in appropriate audits to ensure that effective visible felt leadership, mentoring and coaching are demonstrated.
- 12.6 The audit programme at each Anglo American business or operation shall include processes to ensure the effective monitoring, follow-up and timely closure of corrective and preventive actions.

- **12.7** Each Anglo American business or operation shall identify and monitor appropriate leading indicators of safety performance for the purpose of continual improvement.
- 12.8 At each Anglo American business or operation, executive and senior management shall have clear accountability for ensuring that the audit programme is developed, implemented and reviewed to ensure continual improvement. Operational management shall have clear responsibility to ensure the audit programme is implemented and maintained effectively.
- 12.9 Outside of the formal audit programme, senior management at each Anglo American business or operation shall review, on a periodic basis, the safety management system to ensure its continuing implementation and effectiveness and to ensure that it remains relevant and appropriate to the nature and extent of the associated risks. These reviews shall be documented and, as a minimum, address the possible need for changes to policy, objectives and other elements of the safety management system.



DEFINITION OF TERMS USED IN THE ANGLO AMERICAN SAFETY WAY

Accentable risk

Acceptable risk	A risk that has been reduced to a level that can be tolerated by the organisation with specific regard to its legal obligations, the ALARP principle and its own safety policy.
ALARP	As low as reasonably practicable. The concept of weighing the risk against the sacrifice needed to implement the measures necessary to avoid the risk. In safety and health, it is assumed that the measures should be implemented unless it can be shown that the sacrifice is grossly disproportionate to the benefit.
Assessment	A systematic and documented review of the levels of effectiveness in the implementation of processes, programmes and procedures based on general process criteria and the professional judgement of experienced assessors.
At-risk behaviour	Conduct (whether witnessed or not) that unnecessarily increases the likelihood of injury.
Audit	A systematic and documented review of the effectiveness of implementation of processes, programmes and procedures based on general process criteria set by the organisation.
C&BPs	Contractors and business partners.
Change	A departure (permanent, temporary or incremental) from a currently established baseline, or anything that is or may be substituted for something else. This includes changes to personnel, processes, systems, plant and equipment, technology, documents, risks, legislation, commitments, obligations and external environmental, physical and social factors affecting or affected by the organisation.
Change management	The systematic process for dealing with change to manage safety risk.
CMS	Contractor management system.
Communicate	The process of two-way dialogue which is understood by both parties.
Competence	A combination of attributes such as knowledge, skills, abilities, experience, qualification and attitudes providing adequate assurance of successful performance.
Consequence	Outcome or impact of an event.
Continual improvement	A recurring process of enhancing performance and safety management systems, not necessarily in all areas simultaneously, to achieve improvements in overall safety performance consistent with the safety policy.
Contractor and business partner	An individual, company or other legal entity that carries out work or performs services pursuant to a contract for service. This includes subcontractors.
Corrective action	An action taken to eliminate the cause of a detected non-conformity or other undesirable situation.
Crisis	An actual or potential threat to Anglo American's long-term ability to do business due to the impact on the safety and health of its employees and contractors or its impact on the public, the environment, or Anglo American's operability and assets, image and reputation, or liability.
Critical equipment	A piece of equipment or a structure whose failure, or failure to perform to design specification, has the potential to result in a major accident event.

Culture	The whole complex of distinctive spiritual, material, intellectual and emotional features that characterise a society or social group.
Design data	Any information used during, or as a record of, the development of a facility that defines the resource, process, product, equipment, operation, layout or control of the facility. This may include, but not be limited to: basis of design, process flow diagrams, piping and instrumentation drawings, models, plans, single line diagrams, isometrics, construction drawings, operating and control philosophies, layout drawings, design calculations, site data, design standards, specifications (including for feed/feedstock and product), process media, materials, cause and effect diagrams, fire and safety studies, manufacturers' data, manufacturers' operating and maintenance manuals, emergency shutdown sequences and critical equipment registers.
Documents	Structured units of recorded information and its supporting medium (medium can be paper, magnetic, electronic or optical disc, photograph or master sample), published or unpublished, managed as discrete units in the safety management system. Most records are documents, but not all documents are records. A document becomes a record when it is part of a business transaction, is kept as evidence of that transaction and is managed within a record-keeping system.
Emergency	An abnormal occurrence that can pose a threat to the safety or health of employees, contractors, customers or local communities, or which can cause damage to assets or the environment.
Employee	An individual who works for Anglo American or one of its divisions or operating units under a contract of employment.
Environment	Surroundings in which Anglo American operates, including air, water, land, natural resources, flora and fauna, habitats, ecosystems, biodiversity, humans (including human artefacts, culturally significant sites and social aspects) and their interaction. The environment in this context extends from within an operation to the global system.
Formal	A defined method which is appropriate for the purpose intended – e.g. a defined and documented system.
Anglo American Safety Golden Rules	The Anglo American Safety Golden Rules is a set of common standards applicable to all operations. These were developed to address the principal causes of workplace fatalities within the Anglo American Group.
Harm	A significant and/or long-lasting adverse impact on people, the environment or the community.
Hazard	A source, situation or act with a potential for harm in terms of human injury or ill health.
HAZOP	Hazard and operability studies.
Hierarchy of control	A series of controls which should be applied in the following order (a number of these options may be considered and applied individually or in combination): 1. Eliminate – the complete elimination of the hazard. 2. Substitute – replacing the material or process with a less hazardous one. 3. Re-design – re-designing the equipment or work processes. 4. Separate – isolating the hazard by guarding or enclosing it. 5. Administrative – providing controls such as training, procedures, etc. 6. Personal Protective Equipment (PPE) – using properly fitted PPE where other controls are not practicable.

Impact	A marked change to the health and safety of people, the environment, the community or property, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services.
Incident	Work-related events or emergencies (including accidents which give rise to injury, ill health or fatality) that have resulted in, or have the potential to result in (i.e. a near hit), adverse consequences to people, the environment, property, reputation or a combination of these. Significant deviations from standard operating procedures are also classed as incidents. Ongoing conditions that have the potential to result in adverse consequences are considered to be incidents.
Likelihood	A description of probability or frequency in relation to the chance that something will occur.
Management system	Management processes and documentation that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively to achieve a specified outcome and to drive continual improvement in performance.
Management review	A high-level (corporate) review of management systems (and these Safety Management System Standards) to ensure that they remain suitable, adequate and effective, and are revised and re-issued as appropriate throughout Anglo American.
Manager	Any Anglo American employee or contractor who has other persons reporting to him or her, or who has the authority to allocate resources.
Mandatory	A compulsory requirement (across all Anglo American operations).
Near hit	A near hit is any occurrence or situation which had the potential for adverse consequences to people, the environment, property or reputation, or a combination of these.
Non-conformity	Any deviation from work standards, practices, procedures, regulations, management system performance, etc., that could, either directly or indirectly, lead to injury or illness, property damage, damage to the workplace environment, or a combination of these.
Organisation	A company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration. In the context of the Anglo American Safety Way, organisation means site, operation or business.
Participation	A process through which stakeholders influence and share control over initiatives, decisions and resources which affect them.
Partners	Includes joint venture partners, government agencies and other stakeholders that execute projects or programmes of work with Anglo American companies/operating units, excluding contractors.
Peer review	The peer review internal audit programme has been developed as a means of assurance that fundamentally sound, risk-based management systems are in place at all Anglo American operations or places of business. Peer review assists in building core competence and acts as a catalyst for learning and sharing across the Anglo American group.
Performance	Measurable results of the safety management system, related to an organisation's control of its potential impacts, based on its safety policy, objectives and targets.

Personnel	People engaged in work for, or on behalf of, Anglo American companies including employees, people on temporary contracts and contractors.
Policy	Statement by an organisation of its intentions and principles in relation to its overall performance; it provides a framework for action and for the setting of objectives and targets.
Preventive action	An action implemented to eliminate the cause of a potential non-conformity or other undesirable potential situation.
Procedure	A specified way to carry out an activity or a process. Procedures may be documented or not. An Anglo American procedure is mandatory to all Anglo American sites and operations; these procedures address specific areas (e.g. corporate performance reporting, risk management, incident investigation, etc.) where it is important that activities are carried out consistently across the Anglo American Group.
Product	Articles, materials and wastes arising from the processes and activities of the site.
Records	Recorded information, in any form, created or received and maintained by an organisation or person in the transaction of business or the conduct of affairs, and kept as evidence of such activity. An electronic record occurs where the above is represented in a form suitable for retrieval, processing and communication by a computer. Records are distinguished from other documentary forms such as information by their intrinsic relationship to the business or activity they represent. This relationship is essential to defining a record and is only possible when the links between content, structure and context exist. A record is created; a record cannot be rendered. Records can include, but are not limited to, monitoring results, evidence of training, audit/self-assessment/inspection findings and calibration reports.
Resources	Resources may include human resources and specialised skills, organisational infrastructure, plant, equipment, technology and financial resources.
Risk	A combination of the likelihood of an occurrence of a hazardous event or exposure and the severity of injury or ill health that may be caused by the event or exposure.
Risk assessment	A process of evaluating the risks arising from hazards taking into account the adequacy of any existing controls and deciding whether or not the risks are acceptable. This is dependent on the correct identification of the hazards and an appropriate estimation of the risks arising from them with a view to comparison with acceptable risk criteria or goals for the purposes of controlling the avoidance of such risks.
Risk management	The systematic approach to establishing the context of a situation, hazard identification, risk analysis, risk evaluation, determining whether the risks are acceptable, and the ongoing treatment of risks through the application of management policies, processes and procedures.
Root cause	The cause of the incident (not the direct cause) that, when rectified, will prevent the recurrence not just of incidents with those exact circumstances, but others with similar causes. When applied to successes, it can elicit the actions required to emulate and repeat the success. Root cause is sometimes referred to as underlying cause.
Safety management system	Part of an organisation's management system used to develop and implement its safety policy and manage its safety risks.
Scope	Defines the boundaries within which the management system applies.

Significant risk	A risk that causes, or has the potential to cause, impact or harm that could result in a significant incident.
SQRA	Semi-quantitative risk assessment.
Standards	Mandatory at all Anglo American businesses and operations, Standards form the basis for the development and application of management systems at all levels of Anglo American.
Supplier	A business entity that provides to Anglo American Group businesses or operations any goods and/or services which are integral to and utilised in/for the activities of that organisation.
System	A set of arrangements, responsibilities and authorities aimed at ensuring the achievement of defined outcomes.
Target	Detailed performance requirements, quantified where practicable, that arise from objectives and that need to be set and met in order to achieve those objectives.
Third party	An independent party, distinct from Anglo American employees.
Visible felt leadership	A term describing the process of management regularly visiting the workplace and engaging with people to address safety issues.
Visitor	A person, visiting an Anglo American business or operation, who is not an Anglo American employee or contractor at that business or operation.
Workplace	Any location in which work-related activities are performed under the management control of the organisation, or where management can reasonably be expected to exercise a duty of care.

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