SERITI

SAFETY. HEALTH. ENVIRONMENT.

THE SERITI SHE WAY

Simplicity. Intensity. Consistency.

Khumbul'ekhaya

CONTENTS

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CHAPTER 1: INTRODUCTION

Seriti is committed to the pursuit of Zero Harm – a journey that requires the complete involvement of all in our organisation, including contractors and business partners. To sustain this journey, we must address the safety, health and environmental (SHE) risks and opportunities that arise from our activities while systematically achieving regulatory compliance.

The Seriti SHE Way is a management system framework that is integrated into our business processes. It describes our approach to the systematic management of SHE risks and opportunities and how this supports our ambition, values and strategy.

Management system: a set of related elements that underpin continuous performance improvement.

The Seriti SHE Way supports

| The pursuit of Zero Harm, our values and associated objectives. | Our drive for continuous improvement both in respect of SHE and overall business performance through the proactive management of SHE in planning and work delivery. |

The Seriti SHE Way provides a framework for the effective planning, scheduling and control of activities in accordance with our policies, procedures and standards. It is auditable and conforms with the Plan-Do-Check-Act principle.

It comprises seven complementary elements that outline how we manage our SHE performance:

Understanding the context of the organisation
Our SHE management system must be appropriate for the context in which we operate.

Leadership at all levels
Our leaders play an integral role in delivering The Seriti SHE Way.

Planning
Work must be planned, risks managed and opportunities seized to ensure we deliver on our ambition, values and objectives.

Support
The right resources, skills, communications and processes are in place to enable our SHE management system.

Operation
Work is executed by our employees and contractors to manage SHE risks and opportunities.

Performance evaluation
Our SHE performance is measured and reviewed to identify opportunities for improvement.

Improvement
We take proactive measures to understand and address the gaps identified in SHE performance and processes to make things better.

ORGANISATIONAL VALUES AND POLICY

Safety, health and environmental management is core to our ambition and strategy. The thinking and expectations necessary to sustain our journey to Zero Harm are outlined in our values and policy statement.

We believe that no one comes to work to get hurt. Good SHE performance is simply good business. Incurring injury or sickness as a result of work-related activities is both unnecessary and preventable. Attaining Zero Harm will require the collective efforts of all in our organisation, including and without differentiating between, employees, agents and contractors. All have to understand and apply effective safety, occupational health and environmental risk management within and around our operations.

We endeavour to minimise our impact on the environment by designing, building, operating, rehabilitating and closing all operations in a controlled and environmentally-responsible manner minimising pollution and, where possible, eliminating or preventing irreversible environmental impacts.

THE SERITI VALUES

The delivery of best-in-class health and safety performance.

S

Safety and health without compromise

The implementation of what we promise in an intelligent and effective manner.

I

Implement what we promise

The commitment to operate in a manner that achieves compliance requirements for the preservation of the environment.

E

Protection of the environment

Seriti is a South African resources group with an ambition to empower and create growth for all our stakeholders.

T

Transformation for the benefit of all stakeholders

The facilitation of meaningful, long-term empowerment and transformation for the benefit of all stakeholders.

R

Respect for all

The treatment of all our stakeholders with the utmost respect and consideration.

I

Integrity in all that we do

The commitment to be open, transparent and honest in all our dealings.

OUR SAFETY, HEALTH AND ENVIRONMENT POLICY

OUR AMBITION

Seriti is a South African resources group with an ambition to empower and create growth for all our stakeholders.

OUR VALUES

We have **six core values**. 'Safety and health without compromise' and 'Environmental care' are embedded into our organisational values.

S - Safety & Health without Compromise

E - Environmental Care

R - Respect for all

I - Integrity in all that is done

T - Transformation for the benefit of all our stakeholders

I - Implement what we promise

Seriti owns and operates both opencast and underground coal mines. These mines supply Eskom's power stations with coal. As a responsible corporate citizen, we have occupational health and safety and environmental management systems in place at all our operations. These have been developed in accordance with the requirements of ISO14001:2015, OHSAS 18001:2007 and ISO 45001:2018.

OUR INTENT

We acknowledge that creating the culture we desire and maintaining effective systems requires not only the commitment of top management but leadership at all levels and the total involvement of empowered teams and caring individuals. In order to successfully execute our organisational strategy, we intend to develop, implement and maintain **simple non-negotiable standards** to ensure the following:

Safety & Health

Pursue Zero Harm through proactive risk management and improved use of leading indicators.

- Pursue **Zero Harm** through proactive risk management and improved use of leading indicators
- Ensure a healthy and productive workforce through the effective management and monitoring of occupational health risks
- Believe every incident, injury and/or illness is preventable and learn from incidents to prevent recurrence
- Provide safe and healthy work conditions and prevent injury by living our values, applying the **Six Essentials** and upholding our **Eyethu Rules**
- Learn from our monitoring of exposures and medical surveillance to prevent the occurrence of occupational disease
- Promote and motivate for **holistic wellness**, lifestyle change and the management of chronic diseases

Environment

- **Protect the environment** and prevent pollution through sustainable resource use, including the efficient use of energy and water, minimising waste and setting suitable environmental objectives

- Create environmental awareness among employees, contractors, customers and identified suppliers to enhance overall performance
- Continue to be a **responsible corporate citizen**, participating in relevant forums and agencies involved in the stewardship of natural resources

OUR COMMITMENT

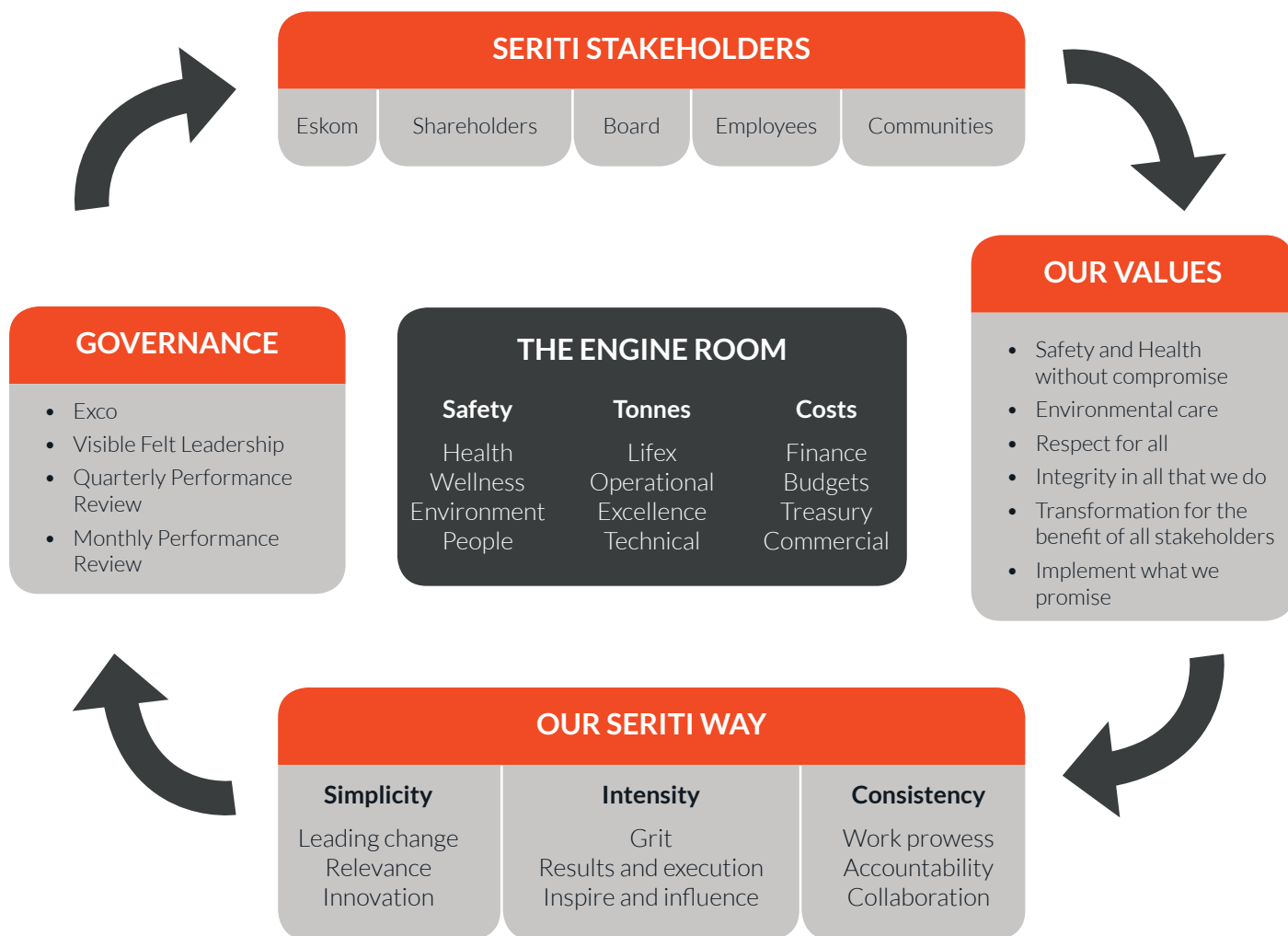We commit to the following principles and actively encourage implementation by our business partners:

1. Accountability: Hold management accountable for safety, occupational health and environmental performance. Allocate adequate financial and human resources to ensure that these issues are dealt with in a manner that reflects their strategic importance.

2. Compliance: Fulfill all legal and other compliance obligations we subscribe to.

3. Competence: Ensure workforce competence and role clarity at all levels through selection, training and development in all aspects of safety, health and environment.

4. Risk Assessment: On an ongoing basis, identify, assess, prioritise and manage the hazards and risks associated with all our activities and address opportunities for improving both systems and performance.

5. Prevention & Control: Eliminate, avoid, minimise or mitigate hazards, aspects and priority unwanted events and impacts through effective controls, including planning, design, workplace procedures and emergency response plans. Learn from incidents and prevent recurrence.

6. Performance & Evaluation: Set simple non-negotiable standards, objectives and improvement plans for those activities with significant actual or potential impacts. Monitor, measure and analyse the effectiveness of management systems against set standards.

7. Stakeholder Engagement: Promote and maintain open, constructive dialogue and good working relationships with our employees, local contractors, suppliers, investors, business partners and other interested parties to increase knowledge and enhance mutual understanding in matters of common interest.

8. Continuous Improvement: Foster creativity and innovation in the management and enhancement of performance of both systems and outcomes.

This policy will be reviewed during management reviews or when the need arises to reflect our ongoing commitment to and evolving understanding of the principles of sustainable human development and Zero Harm.

This policy is communicated to all employees and contractors on a regular basis and will be made available to the public and interested parties upon request.

HOW WE WORK – THE SERITI WAY

OUR OPERATING MODEL

SERITI STAKEHOLDERS

Eskom	Shareholders	Board	Employees	Communities

OUR VALUES

- Safety and Health without compromise
- Environmental care
- Respect for all
- Integrity in all that we do
- Transformation for the benefit of all stakeholders
- Implement what we promise

GOVERNANCE

- Exco
- Visible Felt Leadership
- Quarterly Performance Review
- Monthly Performance Review

THE ENGINE ROOM

Safety	Tonnes	Costs
Health	Lifex	Finance
Wellness	Operational	Budgets
Environment	Excellence	Treasury
People	Technical	Commercial

OUR SERITI WAY

Simplicity	Intensity	Consistency
Leading change	Grit	Work prowess
Relevance	Results and execution	Accountability
Innovation	Inspire and influence	Collaboration

RELEVANCE

INNOVATION

LEADING CHANGE

SIMPLICITY

COLLABORATION

OUR SERITI WAY

GRIT

CONSISTENCY

INTENSITY

ACCOUNTABILITY

EXECUTION AND RESULTS

WORK PROWESS

INSPIRE AND INFLUENCE

OUR STRATEGY

STRATEGIC INTENT

AMBITION To empower and create growth for all our stakeholders (shareholders and board, customers, employees, regulators, communities)

MISSION Deliver through **simplicity, intensity** and **consistency**

VALUES
- Safety and health without compromise
- Environmental care
- Respect for all
- Integrity in all that we do
- Transformation for the benefit of all stakeholders
- Implement what we promise

OUR PHILOSOPHY
- **New beginnings** — A proudly South African mining company
- **Fresh opportunities** — Opportunities for all stakeholders and the company
- **Inevitable growth** — Growing the company for the benefit of South Africa

STRATEGIC FOCUS AREAS (SAFETY, TONNES, COST + PEOPLE)

SAFETY AND REGULATORY
- Sustaining the journey to Zero Harm
- Governance and secretarial
- Legal competence
- Mining Charter focus — our licence to operate

WHAT SUCCESS LOOKS LIKE
- Safety and health without compromise
- Mining coal by being best in class in safety, tonnes and cost
- Maintaining licence to operate

TONNES
- Preferred supplier to Eskom – long-term supply, commercial and marketing
- reserve development and life of mine management
- Delivering to our markets
- Technical competence

WHAT SUCCESS LOOKS LIKE
- Consistent quality and quantity to Eskom
- Effective and speedy project approval
- Delivering on targets and growth
- Cost-effective supplier to Eskom

COST
- A listed Seriti with diversified earning streams
- A robust financial model and visionary corporate finance model
- The cost + risk
- World-class supply chain
- Information management
- Closure

WHAT SUCCESS LOOKS LIKE
- Sense of ownership
- Transparency in all that we do
- Consistent payment of suppliers
- Mining coal by being best in class @ competitive unit cost

PEOPLE
- Stakeholder relations and communication
- Capabilities and skills
- Behavioural framework
- Performance management
- Organisational health

WHAT SUCCESS LOOKS LIKE
- Culture of care for people
- Delivering on people strategy
- Respect for communities
- Open and free information flow

GOVERNANCE: monitor and review: Exco, visible felt leadership (VFL), quarterly performance review (QPR), monthly performance review (MPR)

ALIGNMENT WITH MINE OPERATING SYSTEM

SHE management is aligned with the Mine Operating System. This provides a structured approach to how we set targets, plan, schedule, execute and improve work to achieve our business objectives more efficiently, effectively and sustainably. For both routine and non-routine work, we apply the **Six Essentials for Safe Production**.

The Six Essentials for Safe Production are:

RIGOROUS PLANNING
Planning and structuring all activities in such a way that we ensure tasks are completed safely.

CORRECT TOOLS AND EQUIPMENT
Have a process in place to ensure tools and equipment are safe and operational at all times.

SAFE WORK AREA DESIGN
Have the relevant technical input and oversight to ensure different areas and activities are designed and maintained with safety in mind.

EFFECTIVE SUPERVISION
Have competent supervisors who are equipped and resourced to actively participate in the risk management process to ensure tasks are performed safely and efficiently.
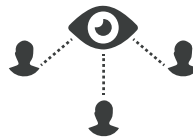
SYSTEMATIC CHANGE MANAGEMENT
Have a formal change management process in place to ensure changes are identified, recognised, assessed, communicated and acted upon.

TRAINED AND COMPETENT WORKFORCE
Equip employees with the knowledge and skills necessary to demonstrate commitment to Zero Harm in every job they do.

In addition to the **Six Essentials**, we developed — through extensive consultation — a set of rules we commit to, own and abide by **Our Eyethu Rules**.

OUR EYETHU RULES

The 13 Eyethu Rules were developed and agreed upon through consultation with our people. They are non-negotiable and meant to protect all from harm. All rules start with 'I WILL'. This is a personal commitment by all employees and contractors to ensure they work safely.

1
I will not operate a machine or equipment for which I do not have a valid licence.

2
I will always SLAM before performing a task.

3
I will never enter an unsupported area underground.

4
I will not enter an area unless a competent person has declared the ventilation to be adequate and atmosphere free from any harmful dust or gases.

5
I will not enter the drop zone area unless I am in possession of a valid permit to do so. If I have to climb on a crest berm my waist will never be higher than the crest.

6
I will always wear a seatbelt.

7
I will never get closer than 20m from mobile surface machinery without receiving permission from the operator.

8
I will never get closer than 3m from underground mobile machinery without receiving permission from the operator.

9
I will never enter a confined space without a permit and continuous gas monitoring device.

10
I will not work above 2m without attaching my safety harness.

11
I will always follow isolation and lock out procedure.

12
I will not go under a suspended load.

13
I will not work alone and without a life jacket around water dams.

SHE GOVERNANCE FRAMEWORK

The SHE governance framework defines the roles and responsibilities of the corporate centre and mining operations on the journey to Zero Harm:

- The corporate centre defines, communicates and reviews requirements in relation to the vision, values, strategy, policy and standards for SHE management.

- Mining operations implement the corporate requirements, building them into business-specific programmes.

CORPORATE

The corporate centre will define and communicate what is required, including clear mandatory standards for the Group. This will require, among other things, resourcing, communication, setting Group key performance indicators (KPIs) and overarching improvement plans.

LEADERSHIP GUIDANCE

- Seriti SHE policy
- Code of conduct
- Group governance documents

GOVERNANCE

- Seriti Board
- Social and Ethics Committee*
- Corporate safety, health and environment function

ASSURANCE

- Internal audits
- Peer reviews
- Second-party audits
- Third-party audits

MINING OPERATIONS (INCLUDING PROJECTS)

Mining operations will implement the Seriti SHE Policy and add their own mine/business-specific standards and rules to these. This will require resourcing, communication, business-specific KPI-setting and operations improvement plans. Requirements apply equally to the contractors, agents and business partners on our sites.

LEADERSHIP GUIDANCE

- Seriti SHE Policy
- Code of conduct
- Mine policy and guidelines

MINING OPERATIONS

- Procedures
- Training
- Behaviour

AUDITS

- Internal
- Self-assessment
- Third-party

The role of the Seriti Board of Directors is to promote the long-term success of the business for its shareholders. The Board delegates certain responsibilities to the appropriate committee – for example, the Social and Ethics Committee.

The Social and Ethics Committee is accountable for determining and overseeing how Seriti manages its most material sustainability issues. The Board delegates executive responsibilities to the Exco made up of the chief executive officer, chief financial officer, chief operating officer, chief technical officer, chief people officer and company secretary.

ELEMENT I
Understanding the context of the organisation

A range of internal and external issues can impact, either positively or negatively, on our ability to sustain our journey to Zero Harm. We must identify these issues and determine which ones need to be specifically addressed and managed within our SHE management system.

This element provides our operations with a deeper understanding of the context in which they operate and in which they establish, implement, maintain and continuously improve SHE management systems. Our operations must ensure they understand and address social risks and impacts (including human rights). Materiality principles must be taken into consideration to maintain our standing as a sustainable organisation and good corporate citizen.

1.1. **Each Seriti business or operation must consider the specific context within which it operates to understand the internal and external issues that may affect the achievement our SHE objectives and the pursuit of Zero Harm. The internal and external issues considered and identified should be documented and updated periodically.**

1.2. **Each business or operation must be able to demonstrate how the context has shaped its SHE management system, including the identification and assessment of SHE risks and opportunities. This includes taking into account conditions that a business or operation affects, and those that can affect the business or operation.**

1.3. **Each business or operation must have a process to determine the specific stakeholder expectations and SHE needs it adopts as compliance obligations. The process should be aligned and ideally integrated with its Stakeholder Engagement Plan. During this process, the business or operation must identify:**

- The stakeholders relevant to its SHE management system and their needs and expectations.

- The stakeholder SHE-related needs and expectations to be adopted as compliance obligations. This process is voluntary and should be informed by the scope and objectives defined by the SHE management system.

1.4. **Compliance obligations stemming from SHE-related stakeholder needs and expectations must be recorded.**

1.5. **Each Seriti business or operation must document the scope of its SHE management system based on consideration of its context, compliance obligations, organisational/functional and physical boundaries; business partners, activities, products and services and its authority and ability to exercise control and influence over these. At a minimum, the following must be covered:**

- All operational activities that have the potential to affect our ability to pursue Zero Harm.

- The entire life cycle of operations, from exploration and planning through to operation, closure and post-closure activities, including decommissioning, remediation and rehabilitation.

- The impacts of our products and services must be considered and, where appropriate, be addressed. This includes all cases where Seriti has control and influence over SHE outcomes.

ELEMENT II
Leadership at all levels

One of the most important contributors to sustained and improved SHE performance is leadership. By being available, visible and felt in the workplace, leaders at all levels, have a significant impact on our organisation's culture. Leaders play a critical role in developing and supporting an engaged and productive workforce and must ensure that they play a 'coaching role' and integrate accountability reviews for SHE into their management routines.

This element presents the requirements that must be met by leaders at all levels to support the SHE management system. Seriti's visible felt leadership process enables our leaders to embed a SHE performance culture throughout our business. It also highlights the need for role clarity, ownership, accountability and responsibility for the SHE management system.

Management and commitment

2.1.   Managers at each Seriti business or operation are accountable for establishing and maintaining a business or operation-specific SHE policy, SHE management system and SHE improvement plan to meet:

Seriti's aspiration for Zero Harm in respect of health and safety and minimising harm to the environment.	The requirements of the Seriti SHE Way and International Standards Organisation's safety, occupational health and environmental management system standards.	Compliance obligations, including legal requirements and agreed SHE-related stakeholder and voluntary requirements.

2.2   Managers must ensure that:

- SHE objectives are established and are compatible with Seriti's ambition, values, strategy and policy.

- Adequate resources (human, technical and financial) are made available to support the effective implementation and maintenance of the SHE management system.

- The SHE management system achieves its intended outcomes, including the fulfilment of compliance obligations, achievement of SHE objectives, appropriate control of SHE risks and continuous performance improvement.

2.3   Managers at each Seriti business or operation are responsible for driving a Zero Harm culture and must visibly demonstrate their commitment to SHE performance by:

- Driving the integration of SHE into business planning and processes and operational management systems.

- Actively participating in SHE programmes, audits and reviews to ensure that corporate and site-specific SHE standards are embedded.

- Engaging with staff and contractors using planned task observations and visible felt leadership techniques and acting as role models in identifying and addressing SHE risks and opportunities.

- Promoting a culture of learning and improvement by learning from incidents, sharing lessons learnt and following up on actions and commitments to ensure effective implementation, consistency of SHE activities and outcomes.

- Empowering employees and contractors to take ownership of SHE management – particularly their right to use their stop work authority when SHE risks are not managed consistently with our vision of Zero Harm.

2.4. Seriti personnel and contractors must demonstrate a clear understanding of the need to comply with corporate and operation-specific SHE management standards and the consequences of noncompliance. This is demonstrated through:

The fulfilment of their defined SHE responsibilities.	Conducting their work with an approach that includes preventing and/or correcting harmful behaviours and work conditions.	Refusing to allow work to be undertaken or continued where SHE risks are not adequately addressed or conflicts exist between operating principles and SHE objectives.

2.5. All Seriti businesses or operations, including contractors, must comply with Seriti's Corporate SHE policy. In addition, they must adopt a SHE policy that is appropriate to the nature and scale of the activities being managed and maintain this continuously to ensure it remains relevant. The policy must:

- Conform with Seriti's SHE policy and comply with the operation's context and all of its compliance obligations.

- Commit to the proactive identification and management of SHE risks supporting the achievement of Zero Harm, including the protection of the environment and preventing pollution.

- Provide a framework for setting SHE objectives to drive the continuous performance improvement of the SHE management system and SHE outcomes.

- Be consistent with other Seriti policies and Group governance documents where relevant.

- Be endorsed by top management, communicated throughout the business or operation and made available to stakeholders.

2.6. Each Seriti business or operation must have clearly defined roles, responsibilities and accountability at all levels and functions to ensure the effective implementation of the SHE management system. These are to be documented and communicated to relevant employees along with the SHE expectations against which their performance will be assessed.

Managers at each business or operation are accountable for the achievement of SHE objectives through the SHE management system. They are supported by SHE practitioners, the technical experts who are responsible for the delivery of the SHE management system to meet compliance obligations and SHE objectives. Employees and contractors are responsible for ensuring they deliver their work in line with the SHE expectations defined in standard operating procedures and relevant Group governance documents.

2.7. Management must assign responsibility and authority for:

Ensuring the SHE management system meets its intended outcomes.	Monitoring employee and contractor SHE performance.	Reporting management system and SHE performance to top management

2.8. The appointed person(s) must have a clear understanding of their roles, responsibilities and authorities to fulfil their duties and support management. Management retains accountability for the site's SHE management system and outcomes.

ELEMENT III
Planning

Seriti's Mine Operating System is based on the Plan-Do-Check-Act principle and provides assurance that what is promised is delivered to the customer in a safe, responsible and efficient way. Adherence to the plan is key to the successful delivery of results. Through rigorous action tracking across all business levels, the system ensures that accountability is driven using a 'bottom-up' approach.

The system is underpinned by the thinking that doing the right work at the right time and in the right way will deliver the required performance.

This element presents the requirements for proactive planning to ensure the SHE aspects and impacts resulting from our activities, our compliance obligations and the SHE risks and opportunities that could affect our work, are understood and addressed.

SHE risk management must be completed in line with Seriti's integrated risk management approach, including its associated recommended practices. This relates particularly to operational risk management (ORM) and its associated procedures, guidelines and templates.

ORM's four interrelated layers are used to manage risk across all activities that affect a site, with the intention being that personnel are empowered to manage priority unwanted events, to minimise the likelihood of negative consequences and enhance the probability of positive outcomes.

LAYER 1	BASELINE RISK MANAGEMENT
LAYER 2	ISSUE-BASED RISK MANAGEMENT
LAYER 3	TASK RISK MANAGEMENT
LAYER 4	CONTINUOUS RISK MANAGEMENT

As part of the planning process, actions will be defined to address the business or operation's:

- SHE aspects, with priority on significant impacts.
- Compliance obligations.
- SHE risks and opportunities.

These actions will be integrated into SHE management system processes, management strategies, operational plans and other relevant business processes. The effectiveness of actions will be continuously evaluated to ensure the delivery of intended SHE outcomes, the prevention or reduction of undesired impacts and continuous improvement in SHE performance.

3.1. SHE aspects and impacts identification

Each Seriti business or operation must determine the SHE aspects of the activities, products, by-products and services it can control or influence. It must also establish their associated impacts from a life cycle perspective.

An aspect is a feature or characteristic of an activity, product or service that interacts with the environment and/or people and can affect them, positively or negatively. The life cycle perspective considered will depend on the SHE aspects identified and the defined scope of the SHE management system.

It could entail:

- The full life of the operation, from exploration and planning through to operation, closure and post-closure activities, including decommissioning, remediation and rehabilitation. For example, the quality and quantity of water used across operational phases.

- The life of a material, product or substance, from extraction, production, use and disposal. For example, chemicals used on site.

When considering SHE aspects, we must take into consideration potential adverse or beneficial impacts on the environment, the safety and health of Seriti personnel, contractors and business partners; communities and other stakeholders.

Significant SHE aspects must be identified using established criteria, with operations establishing and maintaining an up-to-date register of SHE aspects and impacts.

Significant aspects identified must be appropriately communicated across various levels of the organisation. The identification and evaluation of SHE aspects and related impacts must be conducted by personnel with suitable SHE and operational experience and knowledge.

The identification of SHE aspects and impacts forms part of the ORM baseline risk management process designed to look across an entire operation to systematically identify and assess priority unwanted events or significant risks and opportunities.

As part of this process, sites must consider the SHE aspects that arise from their activities, products and services and assess the significance of these to identify significant impacts and inform the identification of SHE risks and opportunities. The process must be:

Robust, drawing on insights from qualified personnel in a systematic manner to ensure the validity of findings.	Comprehensive, taking into account internal operational and external environmental and community factors.	Detailed enough so that users can comprehensively understand the identified SHE aspects and impacts.
Repeatable to provide consistent results.	Practical and user-friendly.	Auditable.

The identification of SHE aspects must take into account the following:

- The business or operation's activities, specifically considering:

    – The life of mine or life of operation plan.
    – Planned and unplanned activities.
    – Routine and non-routine work.
    – Work areas, processes, products and materials to deliver on activities.
    – Supporting procedures and services.
    – All personnel, contractors, business partners, suppliers and visitors that participate in activities.
    – Operating procedures and work organisation.
    – All machinery/equipment, facilities and installations.
    – Work environment, for example, working at altitude or at sea.
    – Capabilities and human factors.

- The external environmental and community context, including the operation's baseline community and environmental conditions, both of which can be affected by or are capable of affecting the operation.

- Planned and unplanned changes, including planned or new developments and new or modified activities, products and services.

- Abnormal conditions, including reasonably foreseeable emergency situations.

- A life cycle perspective, as appropriate, when considering activities including:

    – Design and development of facilities, processes, products and services.
    – Acquisition of raw materials.
    – Operational or manufacturing processes.
    – Operation and maintenance of facilities, organisational assets and infrastructure.
    – Concurrent rehabilitation of areas to reduce long-term end-of-life liabilities.
    – SHE practice and performance of external providers.
    – Product transportation and service delivery.
    – Storage, use and end-of-life treatment of products.
    – Waste management, including reuse, refurbishing, recycling and disposal.

SHE aspects and impacts must be considered in line with the guidance provided in Seriti's Group governance documents relating to SHE and in relation to our commitments. For example, to use shared resources like water and energy efficiently.

3.2. Compliance obligations

Each Seriti business or operation must maintain a formal register (or registers) of the compliance obligations relating to its SHE management system. Compliance obligations should be mapped to SHE aspects as part of the ORM process to support the identification of SHE risks and opportunities. For example:

- Compliance with all applicable Seriti Group governance documents.

- Conditions of environmental, health and social impact assessments and other authorisations and approvals, including commitments made as part of application processes.

- Commitments made in environmental and social management plans or in registers of social commitments relating to SHE.

- Legal requirements at all levels of government (national, provincial and local).

- International legislation, including treaties, conventions and protocols applicable within the operation's geography.

- Standards and codes of practice prescribed by law.

- Guidelines and codes of practice accepted by the operation.

- Voluntary initiatives that Seriti, the business or operation subscribes to.

- Stakeholder SHE needs and expectations adopted as compliance obligations.

Each Seriti business and operation will determine how compliance obligations apply and ensure that they are considered in establishing, implementing and maintaining its SHE management system by:

Developing a process that maintains regular access to changes in legislation.	Providing training to meet compliance obligations.	Ensuring that monitoring and audit programmes incorporate compliance obligations.	Developing standard operating and other procedures in line with compliance obligations.

3.3. SHE risks and opportunities

Each Seriti business or operation must determine and address the risks and opportunities that could affect the SHE management system's intended outcomes. The identification of SHE risks and opportunities should be completed in line with Seriti's approach to ORM, specifically:

- The baseline risk management process to systematically determine and analyse the risks and opportunities that may occur across an operation to identify its priority unwanted events (significant risks rated as level 4 or 5 consequence as per Seriti's ORM matrix), for which critical controls must be defined.

- The issue-based risk management process to understand and develop knowledge and detailed control strategies for significant risks. This includes bowtie analyses and critical controls.

The identification of SHE risks and opportunities must take into consideration the context of the operation, its compliance obligations and the SHE aspects and impacts arising from its activities, products and services, adopting a life cycle perspective.

Potential emergency situations must be identified, assessed and documented as part of the SHE risk identification process. This should include neighbours and potential off-site emergency and crisis situations involving, for example, the transportation of personnel, the transportation of hazardous materials and employees performing work away from a fixed site.

Each Seriti business or operation must maintain documented information of the SHE risks and opportunities that need to be addressed within the ORM process.

3.4. SHE objectives

Each Seriti business or operation must establish, implement, maintain and document SHE performance objectives at relevant levels and functions throughout the operation.

Objectives must:

Be consistent with the vision of Zero Harm, Seriti SHE Policy and, if relevant, the business or operation's SHE Policy.

Reflect the business or operation's context, its SHE aspects and compliance obligations as well as the SHE risks and opportunities identified.

Be SMART – Specific, Measurable, Achievable, Relevant and Time-bound.

Define an improvement plan/s to achieve the SHE objectives. Improvement plans must clarify the actions to be taken and, where appropriate, how they will be integrated into the operation's business processes.

Show the human, technical and financial resources that will be deployed to achieve objectives and integrate these into the operation's budget.

Include persons responsible and accountable for the delivery of the actions identified. Responsibilities must be clearly assigned, communicated and understood by all appropriate personnel, including senior management, line management, employees and contractors.

Set out the timeframes for achieving the set objectives.

Plot the process for communicating the objectives to personnel and other stakeholders.

Depict the framework for evaluating whether the objectives have been achieved, including indicators for monitoring and reporting on progress.

ELEMENT IV
Support

We must apply the right resources – human, natural, infrastructural, technological and financial – to ensure the effective functioning and improvement of our SHE management system. This is in line with the sound management principles that require work to be planned, funded, resourced and scheduled before it can take place.

This element seeks to ensure that Seriti employees and contractors are both aware of how they can impact SHE outcomes and are competent to complete their activities. It incorporates strong governance systems for the internal and external communication of information on SHE performance and supports our approach to training, capacity building and communication.

4.1. Competence

Each Seriti business or operation must have a formal system in place to ensure that all personnel are competent to perform their activities in alignment with the Seriti SHE Way.

The system must:

- Clearly define the SHE competencies required to fulfil duties in terms of education, training and experience for all organisational roles, positions and job functions that may affect SHE performance.

- Assess the competencies of personnel and contractors as part of the recruitment, job selection and personnel movement process.

- Provide training, refresher training and coaching to personnel with SHE management roles and responsibilities, especially in the context of aspects and impacts identification, risk evaluation and management, compliance evaluation and change management.

- Deliver training programmes in an effective and appropriate medium, taking into consideration cultural and educational diversity, varying levels of responsibility, ability, language skills, literacy and the workplace SHE risks that must be addressed.

- Periodically review the effectiveness of training systems and processes to ensure that they remain relevant and appropriate to the nature and extent of the operation's SHE risks.

- Retain appropriate documented information as evidence of competence.

4.2. Communication and awareness

External communication

Each Seriti business or operation must develop and implement a process(es) to communicate with stakeholders externally on information relevant to its SHE management system, the fulfilment of its compliance obligations and responses to relevant communications on its SHE management system.

Internal communication

Each Seriti business or operation must develop and implement a process(es) to ensure effective consultation, participation and the communication of matters relating to SHE across all levels and functions of the organisation.

- Clarify, within a communication plan, the modes, timeframes, contents, roles and responsibilities for communication and the target audience.

- At a minimum, drive internal awareness of:

  - SHE policies, significant aspects, impacts, the 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, including defined compliance obligations.

- Take into consideration the cultural and educational diversity of the workforce, varying levels of responsibility, ability and exposure to SHE risks.

- Be reviewed periodically to support continuous improvement of the SHE management system.

- Communicate SHE information in a manner that is reliable and consistent with the information generated in the SHE management system to enable effective decision-making and performance improvement.

- Ensure changes to the SHE management system are timeously communicated.

- Ensure appropriate documented information is retained as evidence of consultation and participation.

4.3. Documented information

Each Seriti 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 be aligned and integrated with the operation's document management approach.

The system(s) must:

- Clarify a procedure for the identification, storage, preservation, protection, retrieval, retention (for example, the duration over which documents are kept), updating, review, approval, distribution, access and disposal of documented information.

- Ensure documented information is maintained, periodically reviewed and approved for adequacy and accuracy by authorised personnel to ensure that it is appropriate and understandable.

- Be available, understandable, legible and suitable for use, where and when it is needed.

- Be adequately protected and preserved (for example, from loss of confidentiality, improper use or loss of integrity).

- Include a process to ensure that documents from external sources necessary for the planning and operation of the SHE management system are identified, registered, current and in a suitable format, either paper or electronic, and their distribution controlled.

ELEMENT V
Operations

This element presents the requirements for our businesses and operations to ensure that all the work we execute is in line with our SHE improvement plans and objectives. This includes ensuring that our contractors and business partners operate in line with the requirements of our SHE management system, that SHE aspects arising through our value chain are controlled and that we are prepared for and have the capability to respond appropriately to reasonably foreseeable emergency situations.

This is enabled by Seriti's ORM process which defines task and continuous risk management processes and ensures that they are integrated with work management.

5.1. Operational planning and control

Each Seriti business or operation must establish, implement, control and maintain the processes needed to meet the SHE management system's requirements and implement the actions identified as part of planning to ensure:
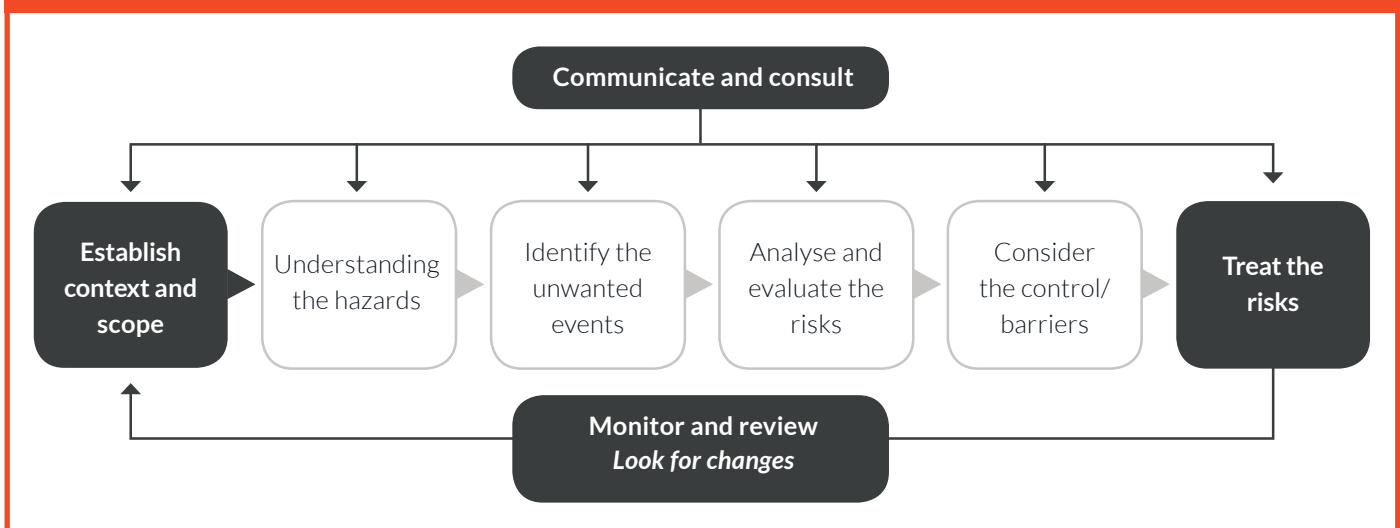
- Operating criteria and process controls are deployed.

- Relevant controls, including critical controls, to manage risks in place.

- Extent of control or influence on outsourced processes is predetermined and defined.

5.2 High-risk work

Each Seriti business or operation must have a formal process for managing and overseeing high-risk work. The process must cater for the identification of high-risk work, implementation of appropriate controls, escalation of undesirable risks and independent verification commensurate with the risk. The process must include:

- Provisions for a Permit to Work system with clear roles and responsibilities, planning, implementation and close-out steps.

- Isolation, lock-out, tag-out and testing for zero energy. Isolation shall be applicable for all types of energy and cater for unique or individual lock-out with unambiguous equipment hand-over and take-over requirements.

OVERVIEW OF RISK MANAGEMENT PROCESS

Communicate and consult

Establish context and scope → Understanding the hazards → Identify the unwanted events → Analyse and evaluate the risks → Consider the control/barriers → **Treat the risks**
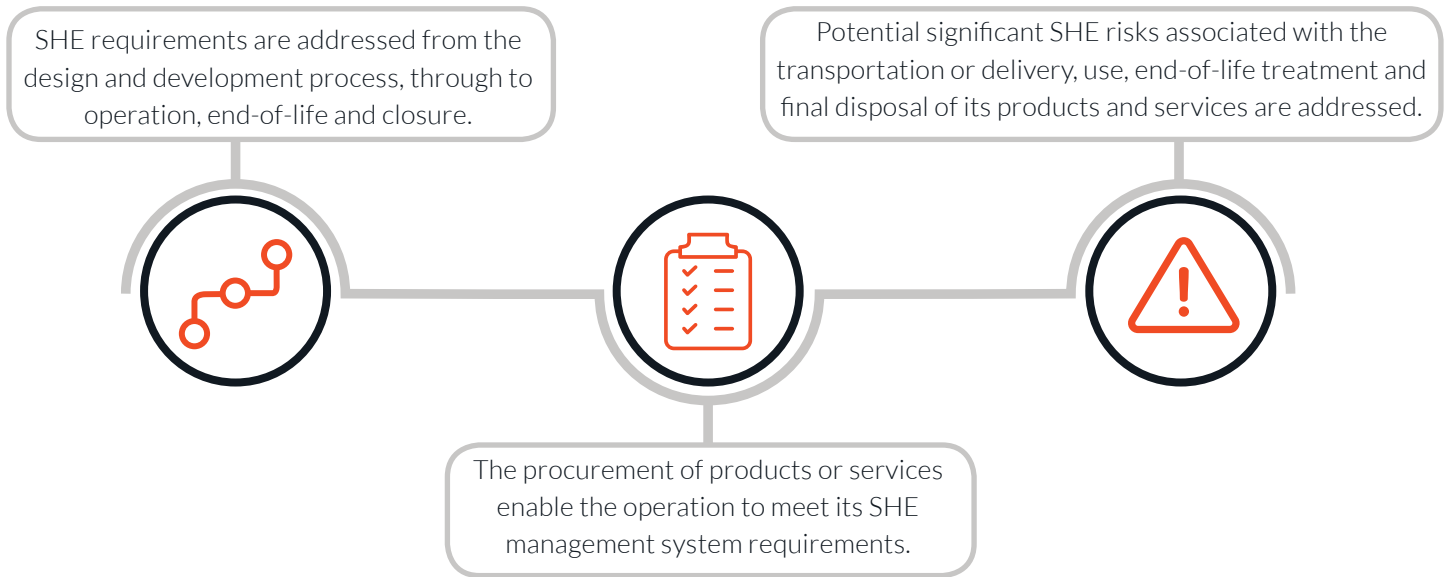
Monitor and review
Look for changes

The controls to manage SHE risks and opportunities will be defined in the various stages of ORM as per the figure above.

5.3   Control effectiveness

- For all priority unwanted events with significant SHE consequences (level 4 or 5 as per Seriti's ORM matrix) relating to processes, products, services and activities, control strategies should be defined using the bowtie method as part of the issue-based risk management process.

- For all other identified SHE risks and opportunities, controls will be put in place through task-based risk management through which effective and productive task expectations are defined. At this point, all SHE-specific requirements and controls for SHE risks and opportunities tied to specific tasks will be considered within the Job Risk Analysis (JRA) and integrated with standard operating procedures, where relevant.

- The controls identified using bowtie analysis and that are specifically applicable to a task will be integrated into the work through the JRA method. Sites must ensure that any significant off-site risks (with off-site consequence level 4 or 5 as per Seriti's ORM matrix) that relate to their activities are prioritised and controlled at a minimum.

- All controls must be defined in line with the principles of the hierarchy of controls. It is a requirement that planned and unplanned work, including deviations from planned tasks, be subjected to appropriate task-based risk management prior to the commencement of work. Where appropriate, operations should consider opportunities for offsets.

- SHE risks and opportunities are continually assessed and addressed during work execution through ORM's fourth layer of continuous risk management which aims to have everyone 'stop and think' and then proceed with a task or activity only if it is safe to do so.

- Continuous risk management must be used by everyone to manage risk during task execution and ensure that controls are in place and appropriate to complete work in line with SHE expectations. This should consider, among other things, workplace conditions, behaviours and interactions. Everyone must be trained in the Stop-Look-Assess-Manage (SLAM) tool and apply the practice as part of work execution.

Each Seriti business or operation must adopt a life cycle perspective when defining controls and, where appropriate, establish controls to ensure that:

SHE requirements are addressed from the design and development process, through to operation, end-of-life and closure.

Potential significant SHE risks associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services are addressed.

The procurement of products or services enable the operation to meet its SHE management system requirements.

Each Seriti business or operation must define processes to ensure the effective review of operational control systems, measures and processes to guarantee that they remain relevant and appropriate to the nature and extent of the associated SHE risks. They must also maintain documented information to demonstrate the implementation of controls and planned SHE actions. This includes, but it is not limited to, conducting regular planned task observations and VFL interactions, ensuring that the outcomes of these activities are captured, and corrective actions implemented.

5.4. Contractor management

Each Seriti business or operation must have a formal contractor management process (CMP) in place. This system must be appropriate to the nature and extent of the SHE risks and opportunities associated with Contractors and Business Partners' (C&BPs) activities and ensure that these are undertaken in line with the requirements of the Seriti SHE Way.

The system must include:

- SHE criteria for the selection of C&BPs.

- Requirements to ensure that SHE criteria are built into C&BP contracts, including compliance with the Seriti SHE Way.

- A governance framework, including clear and documented reporting relationships, lines of reporting and communication, roles, responsibilities, accountabilities and, where appropriate, system interfaces between C&BPs and the operation. This must include the appointment of a contractor management coordinator.

- SHE performance reporting requirements for C&BPs and a process to address and rectify any noncompliance.

- A process to periodically evaluate C&BPs based on their performance against defined SHE criteria, their alignment with the Seriti SHE Way and the site's compliance obligations.

- Identify opportunities for continuous improvement of C&BP SHE performance.

- A process for monitoring compliance and enforcing the implementation of all standard operating procedures relevant to C&BPs' work, as well as auditing contractor work areas.

- The CMP must be reviewed periodically to ensure that it remains relevant and appropriate to the nature and extent of SHE risks and opportunities.

- Documented information to demonstrate the implementation of the CMP must be maintained.

5.5. Management of change

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SIGNIFICANT CHANGES IN OPERATIONAL ACTIVITIES AND/OR PROCESSES

- Unplanned activities.

- Changes in work shifts.

- Planned and unplanned changes need to realign.

- Changes to operational arrangements, including personnel and work process changes.

- Changes in the workplace or external environment.

- Organisational changes.

- Seasonal changes.

- Issues that are identified through incident investigation or other input.

- The introduction of or changes in the use of contractors.

- Modifications to the operational management system(s).

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Each Seriti business or operation must develop, implement and maintain a formal management of change programme to control planned and unplanned changes that could impact SHE performance. These include:

- Changes to applicable compliance obligations, including legal requirements.

- Changes in knowledge or information about SHE aspects and associated SHE risks.

- Developments in knowledge and technology or the operation's context.

- The introduction of new machinery or equipment, new or additional facilities activities and/or chemicals.

- High-risk work that requires verification.

In the case of planned or unplanned changes, permanent or temporary, the identification of SHE-related risks must be undertaken before the change is implemented. The management of change programme must clarify:

- The roles and responsibilities for change management.

- How actions associated with change management will be tracked to closure.

- The process for communicating with internal and external stakeholders on change management.

- The requirements to monitor the controls in place following the change management process.

5.6. Emergency preparedness and response

Each Seriti business or operation must establish, develop, document and implement plans to prepare for and respond to the reasonably foreseeable emergency situations identified through the SHE risk assessment process. The process should be defined to ensure business continuity and be in alignment with the requirements of the Seriti SHE Way. Operations must:

- Prepare to respond by planning actions to prevent or mitigate adverse SHE impacts from emergency situations.

- Respond to actual emergency situations.

- Take action to prevent or mitigate the consequences of emergency situations appropriate to the magnitude of the emergency and the potential SHE impact.

- Identify the appropriate resources, both on and off site, to ensure the implementation of emergency arrangements. These include personnel, occupational health practitioners, organisations, equipment, medical facilities and warning devices necessary for emergency response. All equipment and warning devices must be identified, maintained, tested and available.

- Review and revise, at least on an annual basis and following any emergency or crisis situation, the defined emergency processes and planned response actions to ensure they remain relevant and appropriate to the nature and extent of the associated SHE risks.

- Ensure that all relevant personnel, contractors, visitors, the relevant community stakeholders and regulatory agencies are familiar with the requirements of emergency arrangements and of their respective roles and responsibilities. They should also be competent to deliver on these requirements (training should be provided, where required).

- All SHE practitioners, occupational health practitioners and responsible operational personnel shall have access to up-to-date material safety data sheets and hazmat documentation.

- Communicate relevant information to contractors, visitors, emergency response services, government authorities and, as appropriate, the local community relating to emergency situations and responses.

- Have a detailed documented emergency response plan outlining the specific actions to be followed (and responsibilities) during an emergency.

Emergency response drills shall be conducted at a regular and defined frequency (on an annual basis at a minimum) to determine the effectiveness of emergency arrangements and should include all relevant SHE practitioners and responsible operational personnel. Where appropriate, drills shall address realistic scenarios and include liaison with and involvement of external response organisations and other external stakeholders. Lessons learnt should be documented and incorporated into revisions of arrangements.
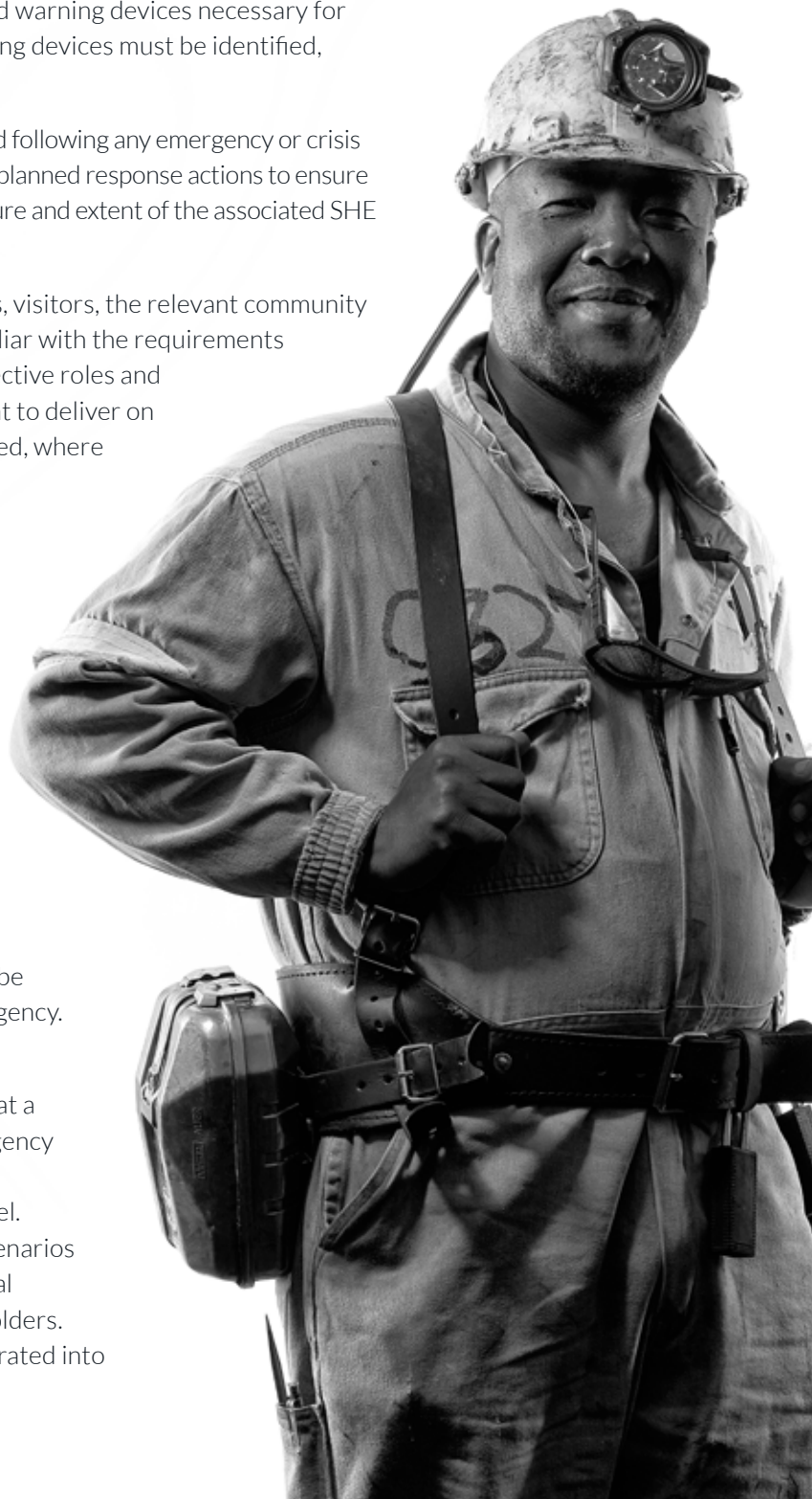
ELEMENT VI
Performance evaluation

A fundamental step in our approach to SHE management and the pursuit of Zero Harm is performance measurement and evaluation. Our businesses and operations must continually measure and assess their SHE performance against the requirements of the Seriti SHE Way, their defined SHE objectives and the management of SHE risks and opportunities.

This includes understanding the performance of our contractors and business partners and other elements of our value chain and SHE management system.

This element presents the requirements for evaluating SHE performance and is supported by our approach to SHE auditing, peer reviews and self-assessments.

6.1. Monitoring, measurement, analysis and evaluation

Each Seriti business or operation must prepare and detail its SHE monitoring requirements that will enable it to measure, analyse, evaluate and report on its SHE performance against its defined objectives and the Seriti SHE Way. The evaluation of performance must:

- Confirm that facilities are operated within the parameters defined through the planning and operational control process.

- Confirm the effectiveness of management measures to enable the site to meet its SHE objectives.

- Assess performance against defined SHE objectives, encompassing compliance obligations.

- Ensure that SHE risks and impacts are adequately controlled as per the hierarchy of control.

The SHE monitoring requirements must clarify what needs to be monitored and measured, and:

- Describe the methods for monitoring, measurement, analysis and evaluation to ensure valid results, including requirements for calibration and verification. Where applicable, this should include consideration of the potential for participatory monitoring.

- Define the criteria and indicators against which SHE performance will be evaluated. These must be in line with defined SHE objectives and compliance obligations.

- State the frequency of monitoring and measurement, analysis, performance evaluation and reporting.

The results of the performance evaluation process must be documented, retained and communicated to internal and external stakeholders in line with the defined stakeholder engagement and communication processes and as required by compliance obligations.

6.2. Compliance evaluation

Each Seriti business or operation must establish, implement and maintain a process to evaluate the fulfilment of its compliance obligations and maintain knowledge and understanding of its compliance status. The evaluation of compliance status must:

- Be completed at an appropriate frequency (on an annual basis as a minimum).

- Be based on appropriate and clearly defined methods for evaluation.

- Be documented.

- Lead to appropriate actions to ensure compliance.

6.3. Seriti SHE Way internal auditing

Each Seriti business or operation must establish, document and maintain an annual audit programme to ensure conformance with the requirements of the Seriti SHE Way. The audit programme must be supplemented by regular self-assessments and peer reviews.

Operations must ensure:

- The scope, frequency and methodology of the internal audit programme – including defined audit criteria – are determined based on the results of SHE risk assessments, previous audits, changes that might affect the organisation and the nature and scale of identified SHE aspects and impacts.

- The objectivity and impartiality of the audit process.

- Persons completing the audit have the right competencies and skills.

- Timely closure of actions identified through the audit.

- Results are reported to relevant management and appropriate stakeholders as required by communication processes and compliance obligations.

- Evidence of the audit process and results are documented and retained.

The business or operation management system will be subject to regular third-party audits and certification.

6.4. Management review

Managers at each Seriti business or operation must periodically (on an annual basis as a minimum) review the SHE management system to ensure its continuing:

- Suitability and fit with the organisation, its operations, culture, business systems and the site's external environment and societal context.

- Adequacy in terms of meeting the requirements of the Seriti SHE Way through its implementation.

- Effectiveness in achieving the desired results.

Through the management review process, managers at each Seriti business or operation must review performance against objectives and improvement plans and make decisions related to:

- Continual improvement opportunities, including improving integration of the SHE management system with other business processes.

- Any changes to the SHE management system and resources needed.

- Actions required, especially when SHE objectives have not been achieved.

- Implications for the organisation's strategic direction.

The outputs of the management review must be documented and retained and, where relevant, communicated to stakeholders in line with defined communication processes and as required by compliance obligations.

THE FOLLOWING ELEMENTS MUST BE CONSIDERED AS PART OF THE MANAGEMENT REVIEW:

- The status of actions from previous management reviews.

- Any changes in the organisation's context, including external and internal issues that can impact SHE outcomes; compliance obligations, SHE aspects, significant impacts, risks and opportunities.

- The extent to which SHE objectives have been achieved; including the organisation's SHE performance, as reflected by trends in incidents, nonconformities and corrective actions, monitoring and measurement results, compliance status and audit results.

- Adequacy of resources to maintain an effective SHE management system.

- Relevant communications from stakeholders, including complaints.

- Opportunities for continuous improvement.

ELEMENT VII
Improvement

We are committed to continuously improving our SHE performance to advance our journey towards Zero Harm. Our business and operations will establish, implement and maintain a process of continual improvement to address the suitability, adequacy and effectiveness of the SHE management system.

This will include identifying and implementing actions to prevent undesirable SHE incidents, learning from incidents, addressing nonconformities and improvement opportunities to enhance SHE performance.
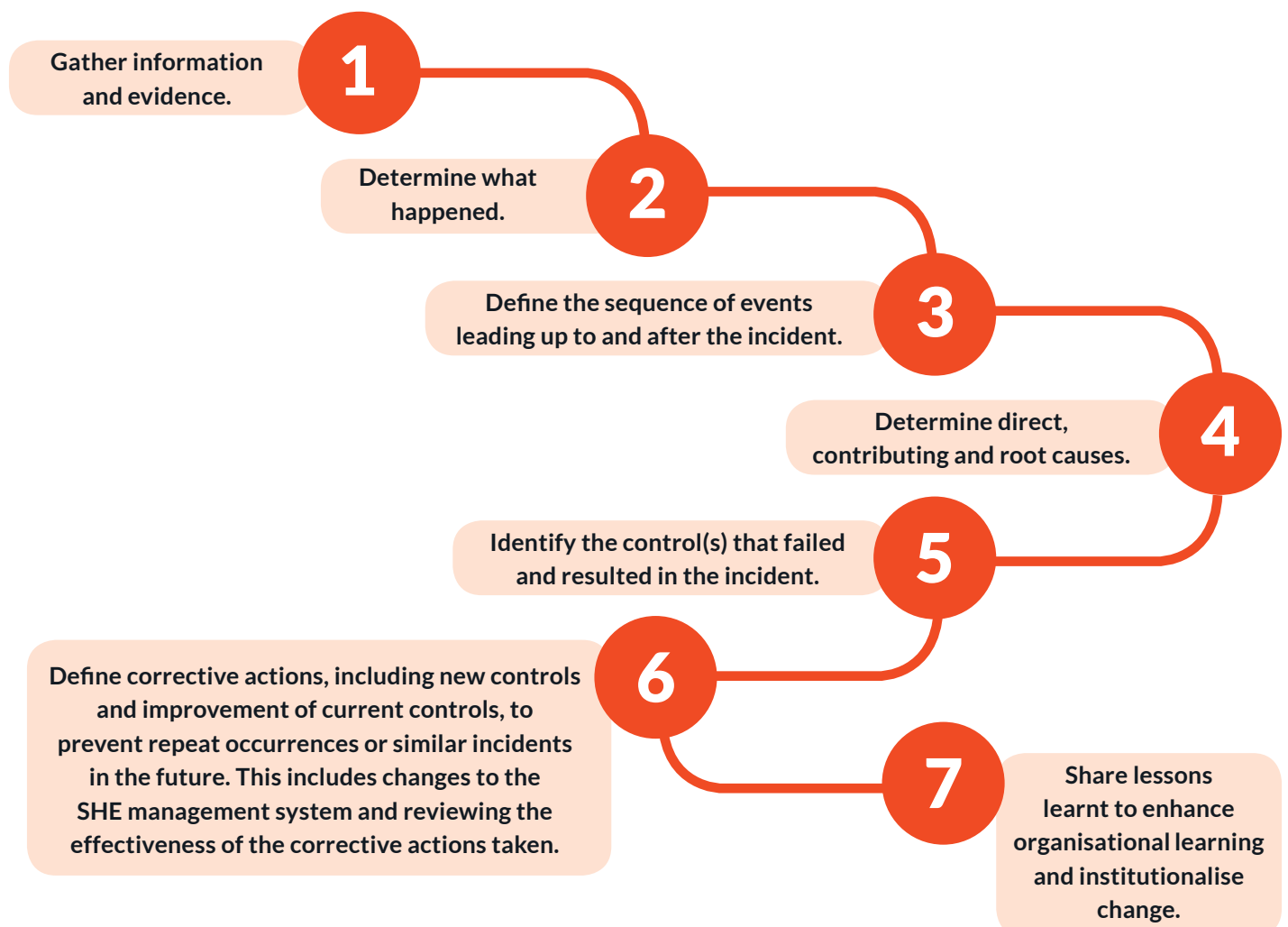
This element outlines the requirements to drive the continual improvement of our SHE management system. It is supported by Seriti's learning from incidents process. This process ensures that SHE incidents are reported, recorded, analysed and investigated. Causes are identified, risk profiles updated, learnings shared, and corrective and improvement actions implemented across the Group to ensure the creation of a sustainable corporate memory and effective knowledge management.

When a SHE incident occurs, the Seriti business or operation concerned must address it by taking action to investigate the cause and identify corrective actions to control it. The consequences of the incident must be dealt with in line with defined emergency response plans (if appropriate).

7.1. Learning from incidents

Each Seriti business or operation must use the mandated procedure for reporting, investigating, closing out (including management sign-off) and communicating SHE incidents.

The objectives of the learning from incidents procedure are to:

1 Gather information and evidence.

2 Determine what happened.

3 Define the sequence of events leading up to and after the incident.

4 Determine direct, contributing and root causes.

5 Identify the control(s) that failed and resulted in the incident.

6 Define corrective actions, including new controls and improvement of current controls, to prevent repeat occurrences or similar incidents in the future. This includes changes to the SHE management system and reviewing the effectiveness of the corrective actions taken.

7 Share lessons learnt to enhance organisational learning and institutionalise change.

Analysis requirements:

- Each Seriti business or operation must define a process to categorise and, if appropriate, investigate and address nonconformities with the Seriti SHE Way in accordance with the learning from incidents process and internal audit procedures.

- Specifically clarify a process for categorising nonconformities and identifying those requiring an investigation (for example, a major nonconformity relates to the absence of a requirement of the SHE management system; a minor nonconformity relates to instances where part of the requirements of the SHE management system are not addressed and observations being findings not constituting a nonconformity but could lead to a nonconformity).

- Complete an investigation of the nonconformity that considers all relevant information and evidence to determine direct, contributing and root causes.

- Define actions to address the nonconformity, including required changes to the SHE management system and reviewing the effectiveness of the corrective actions taken.

- Share lessons learnt and ensure that actions are implemented to address circumstances where similar nonconformities exist or could potentially occur.

7.2. Continual improvement

Each business and operation shall establish, implement and maintain processes to continually improve the suitability, adequacy and effectiveness of the SHE management system to enhance SHE performance.

- Safety, health and environmental management priorities, including risk mitigation and opportunity realisation, shall be built into mining excellence and business improvement initiatives.