



Crisis and Emergency Management Procedure

Brief Description	To set out a procedure and actions required to respond to material emergency events across South32 businesses
Document Owner	Group Manager Health and Safety
Effective Date	30 August 2018
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1. PURPOSE

South32's global operations have the potential to be exposed to internal and external incidents and unplanned events which may impact the health and safety of employees and surrounding communities. These incidents and events could materially impact South32 and its ability to meet business objectives. It is therefore a requirement that South32 develops and implements effective Crisis and Emergency Management (CEM) plans to respond to a wide range of material risks and unplanned events.

In an emergency the safety of those in our employ and the community is paramount. Operations and functions must ensure that it can recover effectively and continue to operate to meet its commitments to our employees, communities and investors.

In accordance with leading international practice our approach is to have Risk, Security, Crisis, Emergency and Business Continuity Management Systems which aligns with relevant industry practices and regulatory requirements.

Business Continuity planning constitutes an essential component of the South32 Risk Management system, in the form of recovery from potential risk events which may significantly impact critical business processes, reputation and revenue streams.

South32 CEM response plans focus on:

- Protecting life
- Mitigation of secondary impacts
- Recovery to restore business continuity

2. SCOPE AND APPLICATION

This procedure applies to all South32 operations, functions, head office and all offices where functions are co-located. Operations and functions are accountable for the compilation, maintenance, implementation and testing of their specific CEM plans. CEM plans must address the specific risks, but as a minimum, comply with the requirements of this procedure.

3. RELATED DOCUMENTS

Market Disclosure and Communications Policy

Material Risk Management Standard

Security and Emergency Management Standard

Health, Safety, Environment and Community Reporting Standard

Corporate Affairs and Investor Relations Standard

External Communication Procedure

Market Disclosure Procedure

Crisis Communication Guideline

4. GLOBAL CEM STRUCTURE - FRT, IMT AND EMT

The South32 global CEM response consists of three key structures, namely;

- Emergency Management Team (EMT)
- Incident Management Team (IMT)
- Field Response Team (FRT)

EMTs, IMTs and FRTs are activated at management’s discretion to manage incidents with a typical risk scheme rating as defined in the Material Risk Management Standard as depicted in the threshold matrix below.

Severity Level	Situational Guidance	Notification and activation required
1-2	FRT Emerging Emergency Actual incident	First response is typically activated by the On-Scene Commander and the Field Response Team leader. The relevant Incident Management Team is notified and is kept informed.
3-4	IMT Emergency	Incident Management Team is activated and the relevant Lead Team member is notified.
5-7	EMT Major Emergency with crisis potential	Emergency Management Team is activated and the CEO is informed. The CEO is accountable to notify the Board, if required.

5. PERFORMANCE REQUIREMENTS

5.1 Key accountabilities

EMT

- Directs and supports the IMT to:
 - contain the incident and, if need be, to increase (internal or external) support for the IMT
 - minimise harm to people, communities, environment and reputation
- Liaise with South32 Lead Team, specifically to ensure that:
 - the CEO and LT is kept abreast of any developments
 - company wide support is coordinated and remains effective
 - regulatory and commercial notifications are made
 - notification to insurers is made (where applicable)
- Determine and manage business imperatives to:
 - minimise financial and legal liabilities (determine if legal professional privilege should be established over any documentation)
 - coordinate media, internal and external stakeholders, investor response in accordance with the Crisis Communication Guideline and matters which may require market disclosure
 - oversee the development of a business continuity response

IMT

- Acts as primary response to managing and mitigating impacts at an operation or function
- Continuous and effective communications between the affected operation/function and EMT/ LT member
- Provide a mandate for on-site decision making to manage risks
- Coordination of Field Response Teams
- Liaison with, and support to Next-of-Kin
- Statutory notification to Regulatory Authorities

FRT

- Reports to the IMT
- Immediately respond to incidents or emergencies
- Containing and controlling the situation at the source
- Liaise with local emergency services including Police, Fire Brigade and external emergency services, as required

5.2 Training and testing requirements

IMT's and EMT's must develop CEM plans to ensure that:

- those involved in emergency situations, including members of EMT / IMT / FRT are competent to execute South32 policies, standards, procedures and applicable regulatory requirements. This include third parties, contractors and service providers which may be impacted.

- detailed business continuity and response plans to material risk scenarios relevant to the operation and function are developed. In countries with a high impact community protest exposure, such plans shall include a response plan to community unrest as set in Appendix 2.
- annual testing / simulation takes place to test the effectiveness of business continuity responses and operational readiness of the emergency response plans. Testing shall include:
 - annual review of relevance of business continuity and response plans
 - development of staff competencies and providing them practice in carrying out their assigned roles
 - validating of response capability and interface with external emergency service providers and related third parties such as suppliers
 - minimum testing frequency shall be a desk top review and a simulated emergency training event aligned to business continuity and response plans alternating annually

It is required that the EMT and IMT document the annual testing outcomes, member participation, reviews concluded and actions required.

6. GROUP CEM STRUCTURES FOR OPERATIONS AND FUNCTIONS

6.1 Emergency management team (EMT)

- The EMT is led by the relevant LT member and consists of appropriate operational leadership or functional team members and key support staff.
- The EMT is supported by functions such as Corporate Affairs, Investor Relations, Finance, Human Resources, Sustainability, Legal and Marketing. Other personnel may be co-opted as required by the EMT leader. The structure of an operational or functional EMT is at the discretion of the relevant LT member who will define roles and responsibilities of team members.
- Typical structure for an operational EMT is as per below.

Role	Designation	Alternate
EMT Leader	COO	Lead Team member
EMT Coordination	Manager HSE Operations	Lead HSE Operations
Corporate Affairs	VP Corporate Affairs	Manager Corporate Affairs
Finance	Group Manager Management Reporting	Group Manager Financial Reporting
Marketing	VP Marketing	Commodity Manager
Human Resources	VP HR Operations	Manager HR Operations
Sustainability	VP HSE Operations	Manager HSE Operations
Legal	VP Legal Operations	Manager Legal Operations
Log Keeper/Scribe	As nominated by EMT leader	As nominated by EMT leader

6.2 Incident Management team (IMT)

- The Incident Management Team (IMT) is the team comprising operational or functional leaders to respond to an emergency. Operational IMTs are led by the VP Operations and functional IMTs are led by the accountable VP.
- A typical operational IMT structure is set out as below and may include other relevant operational roles such as Production Managers, Planning, Engineering, Maintenance and other support staff. The structure of the IMT is at the discretion of the IMT Leader who will define roles and responsibilities of team members.

Role	Designation	Alternate
IMT Leader	VP Operations	Relevant manager
IMT Coordinator	Manager Business Improvement	Manager Engineering
Corporate Affairs	Lead/Manager Corporate Affairs	Principal Corporate Affairs
Planning	Manager Planning	Lead Planning
Engineering	Manager Engineering	Lead Engineering
Legal	Manager Legal Operations	
Finance	Lead Finance	Principal Finance
Human Resources	Lead Human Resources	Principal Human Resources
Sustainability	Lead HSE Operations	HSE Operations Specialist
Logistics & Supply	Lead Supply Operations	Specialist Supply
Log Keeper and Scribe	Team Assistant	Team Assistant

6.3 Field Response Teams

- The Field Response Team (FRT) is the primary responder to the emergency at the source (e.g. paramedics, fire-fighting teams, rescue teams, hazmat teams, security personnel). FRTs cooperate with external emergency resources and service providers such as Mine Rescue Services, Police, local Fire Authority, Medical and Ambulance Services.
- FRTs may operate off site if approved by the IMT leader and if their activities are under the control and jurisdiction of a regulatory emergency authority for activities such as traffic control, ambulance services and pollution control support.
- The structure of an operational or functional FRT is at the discretion of the IMT leader. The IMT leader is accountable to define roles, responsibilities and resourcing of the FRT to ensure that emergency responses remain effective.

7. DECLARING AN EMERGENCY (ACTIVATION OF IMT AND EMT)

- Mobilisation of an EMT will be at the discretion of the relevant Lead Team member. Any event with an actual or potential severity greater than level 5 in the Material Risk Management Standard may trigger an EMT activation. Activation of an EMT does not automatically trigger mobilisation of supporting IMTs and

FRTs for situations that does not require IMT/FRT support. The Lead Team member may mobilise the EMT for any event, including, but not limited to:

- Hostage, kidnap, ransom or extortion events
 - Toxic or hazardous material release
 - Oil / chemical spills or odour where the source might be at a South32 operation and the incident is likely to attract significant media, community and / or NGO attention
 - Hostile government or media scrutiny which may be caused by public outcry over perceived environmental negligence or controversial company policies
 - Strikes and / or other major workforce-related disruptions
 - Major civil disturbance where evacuation may be required
 - Natural disasters with risk of fatalities or major community impacts
 - Major threat to business continuity including significant IT disruption, loss of a key facility or a marketing related incident
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- Activation of an operational IMT is at the VP Operation's discretion and functional IMTs are activated by the accountable VP. Activation of IMTs would include, but not be limited to, incidents with a typical risk scheme rating of 3 and higher, as set out in the Material Risk Management Standard. The IMT leader must notify the LT member that an IMT has been activated. The IMT leader is accountable to assess the materiality of the incident, resources required and to liaise with the Lead Team member if an EMT activation is required. If the EMT is not activated; matters relating to legal, media, internal and external stakeholders, investor response and market disclosure requirements will be coordinated via the accountable functional VP in consultation with the IMT.

8. POST INCIDENT MANAGEMENT AND REPORTING

- An IMT close out report must be submitted to the relevant LT member within 15 working days of IMT conclusion.
- An EMT close out report must be submitted to the Lead Team within 30 working days of EMT conclusion.
- EMT and IMT close out reports should include, impacts to personnel and operations, details of responses, action plans to close out remaining actions and lessons learned.
- EMT and IMT close out reports must include details of necessary revision of any control measures under a safety management system at an operation implemented in response to the incident in accordance with any regulatory requirements.
- IMT/EMT leaders must consult with Legal as to the need to maintain legal privilege for post incident reporting.

Appendix 1. ABBREVIATIONS AND DEFINITIONS

Abbreviation	Term
CEM	Crisis and Emergency Management
EMR	Emergency Management Room
EMT	Emergency Management Team
FRT	Field Response Team
IMT	Incident Management Team
IT	Information Technology
VPSHR	Voluntary Principles on Security and Human Rights
CA	Corporate Affairs
CUPP	Community Unrest Protest Plan
LT	Lead Team
EAP	Employee assistance programs

Appendix 2. COMMUNITY UNREST PROTEST PLAN

This section is only applicable where risks associated with community protest action is rated as high, such as South Africa.

IMT leaders must develop a Community Unrest Protest Plan (CUPP). As a minimum requirement the CUPP must include:

- A risk assessment, specific to unrest, including:
 - threats and key vulnerabilities
 - appropriate mitigations
- The CUPP is to be updated if information received indicates a change in threat and the IMT plans must reflect the most recent threat assessment.
- “Red-zones”, whereby areas are created that no employee or contractor (other than permitted Security or Corporate Affairs personnel) is permitted to enter in times of unrest. These areas are typically directly adjacent to potential areas of conflict.
- Creation of a double barrier system at all main accesses that includes lockable gates.
- Alternate evacuation routes to ensure all staff can be evacuated safely. These routes must be regularly reviewed for suitability based on current threat levels as well as safety considerations.
- Rules of engagement and VPSHR must be communicated to security and emergency response staff annually as part of a formalised training program.
- Members of IMTs and FRTs are to be trained to effectively execute the CUPP
- Mapping of “red-zones” and safe evacuation routes.
- Communication with other companies, suppliers and relevant stakeholders which may be impacted by such protest actions

Law enforcement agencies must be engaged and briefed to mediate an intended protest. Law enforcement deployment plans must clearly indicate the positioning of law enforcement officials. An effective communication plan between law enforcement officials and the operations must be established and agreed to by all parties. Formal engagements with relevant law enforcement agencies are to be documented as evidence of:

- South32’s commitment to peaceful resolution of protests.
- South32’s commitment to legal compliance and adherence to the VPSHR.
- Role clarity during a protest, with South32 security/protection services operating within the property of South32 and the primary duty of off-site safety and crowd control, residing with law enforcement agencies.
- Documented communication and escalation procedures between operations and the relevant law enforcing agencies

Appendix 3. CEM ROLES AND RESPONSIBILITIES

The objective of this section is to provide guidance on specific CEM roles and responsibilities. EMT and IMT leaders may require changes to ensure that roles align with specific business risks

1.1 EMT Leader

- Role Summary
 - The EMT is led by a Lead Team member. The EMT Leader is responsible for the activation of the EMT, and the overall management accountability of South32 response to, and recovery from, the incident.
- Primary Functions
 - Overall responsibility for the management of the EMT
 - Co-Opt other members as subject matter experts if required
 - Communication to CEO and Lead Team

1.2 EMT Co-ordinator

- Role Summary
 - The EMT Coordinator manages the CEM process for the EMT. This includes ensuring that all EMT roles are filled, and all EMT members understand their roles and responsibilities. In addition, the EMT Coordinator ensures that an effective and secure communication system is in place.
- Primary Functions
 - Ensure that the EMT members undertake training as required
 - Arrange the logistics for the EMT personnel
 - Ensure that an accurate log of events is kept by the EMT Log Keeper
 - Manage the EMT communications systems and facilities

1.3 EMT Corporate Affairs

- Role Summary
 - Manage all internal and external stakeholder communications in support of the emergency response effort. This includes, but is not limited to Government, Business Partners, contracted companies and media.
- Primary Functions
 - Advise the EMT on the potential reputational implications of the incident and options to mitigate
 - Track media coverage and develop response plans;
 - Advise the EMT on potential key stakeholder response, the implications thereof, and response strategy;
 - Develop a communication plan and media strategy in support of the EMT response, including;
 - Prepare media releases
 - Prepare and manage the telephone response teams
 - Monitor and advise on media coverage
 - Monitor, analyse and respond to social media
 - Liaise with Investor Relations and Legal on regulatory and market disclosure requirements

1.4 EMT Finance

- Role Summary
 - The Finance group's role is to provide financial, insurance and commercial advice in support of the emergency response effort, including the return to normal business operations.
- Primary Functions
 - Ensure that market disclosures are made
 - Coordinate and manage the provision of specialist financial support
 - Facilitate prompt and effective payment for specialist emergency response services (e.g. charter of an aircraft requiring an immediate guarantee of payment)
 - Determine if a cost-centre should be established to support an insurance claim

1.5 EMT Human Resource

- Role Summary
 - The Human Resources group's role is to provide support to the Lead HR at the affected Operation and provide oversight on HR interventions. Human resource specialists from other operations/head office may be co-opted (e.g. Industrial Relations advisors, Counselling and Mental Health Professionals) to support the IMT.
- Primary Functions
 - Status and tracking of those employees, contractors and third parties affected
 - Coordination of next-of-kin communication
 - Coordination of counselling services (EAP, Religious bodies) for employees, families and EMT members
 - Industrial Relations advice

1.6 EMT Sustainability

- Role Summary
 - The Sustainability function's role is to provide HSE and CEM advice in support of the emergency response, and recovery of critical systems to normal business operations.
- Primary Functions
 - Provide expert input to mitigate and manage HSE risk
 - Ensure operational planning adequately considers security, risks, HSE and business continuity activities.

1.7 EMT Legal

- Role Summary
 - The Legal function's role is to provide advice on the legal impacts of the event, advice on any engagement with regulators post the event, and propose situational specific options to mitigate immediate and longer-term risks.
- Primary Functions
 - Legal support for the IMT/EMT
 - Provide timely mitigation advice to minimise the legal risks

- Consider whether to establish and conduct any investigation into the emergency event under legal professional privilege and notify the IMT/EMT accordingly
- Liaise with external legal counsel as required
- Provide inputs on proposed external and internal communications

1.8 EMT VP Operations

- Role Summary
 - The Vice President of the affected operation will represent the operation at the EMT. The VP Operations is responsible for the overall management of the operation's response to and recovery from the incident. The VP Operations is the primary point of liaison between the Incident Management Team at the affected operation and the EMT.
- Primary Functions
 - Continuous and open communications between the EMT and the affected operation
 - On site management of the incident
 - Brief the EMT on site-specific issues and highlight matters which require further company wide support

IMT Roles and Responsibilities

IMTs at operations will be mainly comprised of the leadership team of that operation. Nominated functional personnel are part of an operational IMT and for the duration of an IMT will report to the IMT leader. IMTs at functions will be managed by relevant functional and support personnel.

1.9 IMT Leader

- Role Summary
 - The IMT Leader is responsible for the decision to activate and stand-down the IMT, escalation and notification to the EMT and the overall management of response to and recovery from the incident.
- Primary Functions
 - The IMT Leader is the final decisionmaker for the CEM plan development, analysis, selection and execution.
 - Ensure response capacity and capability is effective

1.10 IMT Coordinator

- Role summary
 - The IMT Coordinator manages the CEM process for the IMT. This includes ensuring that all IMT roles are filled, and all IMT members understand their roles and responsibilities.
- Primary Functions
 - Establish communications with the incident scene e.g. Incident Command.

- Ensure that the IMT members undertake annual training as required
- Arrange the logistics for the IMT personnel for extended stays, security, food, refreshments, rest areas and meeting rooms
- Ensure that an accurate log of events is kept by the IMT Log Keeper
- Facilities, including communication systems, are in place to support effective functioning of the IMT. For remote/ high risk areas back up communications systems such as satellite communications are considered.

1.11 IMT Corporate Affairs

- Role Summary
 - Advises on the management of internal and external stakeholders
 - Provides information link to the Corporate Affairs function
- Primary Functions
 - Provide IMT input for the development of a communication strategy
 - Develop South32 key messages for the IMT Leader's approval.
 - Develop holding statements, media releases and Q&A's as per CA approval framework.

1.12 IMT Finance

- Role Summary
 - Advises on IMT-related financial support, accounting services, insurance, financial record keeping and reporting, response planning cost analysis and establishes the mechanism for emergency response procurement.
- Primary Functions
 - Advise the IMT on financial considerations relevant to the incident
 - Management of expenses incurred throughout the emergency response
 - Supervise the management of the necessary insurance matters for the incident

1.13 IMT Human Resources

- Role Summary
 - The Human Resources IMT member reports to the IMT Leader and advises on personnel support services, industrial relations and workforce management.
- Primary Functions
 - In cooperation with the relevant regulatory authority, CA and HOD's, manage the notification process for affected employee's next-of-kin.
 - Oversee HR support to next-of-kin and relatives for administrative arrangements such as travel, counselling, accommodation, meals and childcare.
 - Activate EAP for relevant staff and service providers

1.14 IMT Sustainability

- Role Summary
 - The HSE IMT member guides emergency response teams and provide expert inputs to mitigate HSE risks.

- Primary Functions
 - Support and advice on HSE issues and emerging risks
 - Activate and lead the HSE Emergency Response Team
 - Provide guidance for safe start up for operations.

1.15 IMT Logistics and Supply

- Role Summary
 - Responsible for the coordination of all logistics and supply needs in support of the response to the incident. The Logistics Team Member will work closely with the IT and Supply to facilitate the acquisition and distribution of resources and equipment to assist the response effort, the operation of the IMT and the transition to business recovery.
- Primary Functions
 - Liaise with the Operation's Planning team to determine the logistics considerations during the emergency.
 - Facilitate the emergency purchase of approved equipment and facilities
 - Determine if force majeure (FM) should be called in relation to any South32 contractual commitments. Liaise with Legal on the content and timing of the FM notices to customers or vendors.

1.16 IMT Log keeper and Scribe

- Role Summary
 - The Log Keeper and Scribe is responsible for maintaining an accurate, up-to-date record of the decisions and actions of the IMT
- Primary Functions
 - Updating of the status boards
 - Collect and retain a copy of all relevant IMT documents and incorporate into the Incident Log
 - Maintain a chronological log of events including documents, audio recordings and images

Appendix 4. AUTHORIZATION

ENDORSE			
Position	Name	Date	Signature
Group Manager Health and Safety	Nell Gillet		

APPROVE			
Position	Name	Date	Signature
CSO	Rowena Smith		

Appendix 5. AMENDMENT HISTORY

Date	Version	Details
26 August 2015	1.0	New document for South32 Africa Region
February 2016	1.1	Removed references to "Assets"; Removed Duty Cards which will remain in EMT room; Added requirement for IMT Leader to be accountable for reporting of significant incident related to IMT callout.
March 2107	1.2	New Template. Process map included.
May 2017	2.1	CEM revised
August 2018	3.1	Global application aligned to new organisational design. Recalling regional CEM procedures. Focus is extended to enterprise wide risks. Scope of CEM plans include business continuity management requirements for material risk.