

November 10, 2011

Manitoba Operations Safe Production (SHE) Management System Policy

Manitoba Operations is committed to the principles of sustainability. Through the Safe Production Model, these principles include a commitment to achieving zero harm to the safety and health of employees, community, and the environment. This is accomplished by integrating sound management practices into all aspects of the jobs, facilities and activities, by sharing and adopting best practices, and by continually improving these practices to reach zero harm. To realize this goal, Manitoba Operations will maintain a Safe Production Management System that is consistent with the Corporate SHE Management System Standard, Environment Canada's Pollution Prevention Plan for Base Metal Smelters and Refineries and the Mining Association of Canada's Toward Sustainable Mining initiative. The Manitoba Operations Safe Production (SHE) Management System provides for:

- 1) **Leadership Driving SHE Excellence**
 - ❖ Visible action in incorporating SHE considerations into business decisions by setting clear goals and objectives
 - ❖ Annual review of this policy for its suitability and effectiveness in Manitoba Operations.
- 2) **Line Ownership of SHE Supported by SHE Professionals and Committees**
 - ❖ Providing the necessary resources consistent with the current jobs, facilities and activities
 - ❖ Defining roles and accountabilities of the Line Organization, SHE Professionals and Committees
- 3) **High Employee Involvement, Effective Support Systems and External Outreach**
 - ❖ Sharing of Safe Production management policies and practices with employees and communities of interest
 - ❖ Recognition and promotion of the 4 safe behaviors – Plan Accept Care Lead
 - ❖ Employee training to ensure they understand their SHE responsibilities and are skilled & competent
 - ❖ Communication of SHE performance to employees and communities of interest.
- 4) **Comprehensive SHE Risk Management Systems, Work Standards, Emergency Response Planning, and Pollution Prevention Planning**
 - ❖ SHE risk management that allows the reduction of the level of risk to as low as reasonably achievable (ALARA) through the identification, assessment and control of SHE risks
 - ❖ Compliance with legal requirements and company policies
 - ❖ Implementation of Pollution Prevention Planning – including Climate Change considerations.
 - ❖ Robust emergency response planning
 - ❖ Sound Tailings Management
 - ❖ Management of change, and Incident & Accident Investigations
 - ❖ Proper records management of the Safe Production Management System, documents and data
 - ❖ Promotion of good housekeeping
- 5) **Monitoring and Assessment**
 - ❖ Internal and external audits of the SHE systems
 - ❖ Performance measurement and monitoring
 - ❖ Identifying and adopting best practices to achieve zero harm
- 6) **Continual Improvement**
 - ❖ SHE wise, skilled and committed workforce that improves SHE performance and reduces community impact.
 - ❖ Management Reviews of the Safe Production Management System and TSM Objectives

The Manitoba Senior Leadership team is accountable for this policy and every employee is responsible for working to achieve zero harm by applying the Safe Production principles.

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